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6 February 2013 Ref: 1234

General Manager
Greater Hume Shire Council
PO Box 99
HOLBROOK NSW 2644

By email in the first instance: mail@greaterhume.nsw.gov.au

Dear Sir

Re: **Development Application No. 42-12/13: Resource recovery facility (organic composting): "Kalawa", 92 Paterson Road, Gerogery (Lot 1 DP 174425 & Lot 9 DP 10665)**

Further to Council's letter dated 7 December 2012 (**attached**) requesting further information about the above development application please refer to **Attachment 1** for comments in response to issues raised.

Should any further information be required I can be contacted on 0427 090149 or at james@blueprintplanning.com.au

Yours sincerely,
Blueprint Planning

James Laycock MPIA, CPP
PRINCIPAL PLANNER

/Encl.

Greater Hume Shire

simply greater

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Our Ref: CK:DA 42-12/13

Blueprint Planning
'Meringa'
1035 Table Top Road
TABLE TOP NSW 2640

Dear Sir,

DA 42-12/13 INFRASTRUCTURE – RESOURCE RECOVERY COMPOST OPERATION – 'KALAWA' 92 PATTERSONS ROAD, GEROGERY

Council advises that is has reviewed the submitted environmental impact statement and the submissions made in response to exhibition of the statement. In order for Council to proceed in the assessment of your application the following information is to be supplied to Council:

1. Detailed costings endorsed by a quantity surveyor or other suitably qualified independent person justifying the estimated cost of the development which was given as $8.5 million dollars;

2. An expansion of the information provided as to why other alternate sites particularly those that may have had an industrial zoning were not considered to be a feasible location for the proposed development;

3. Further analysis as to how the proposed development is in the public interest of those persons that live in the local area surrounding the site of the proposed development;

4. An itemised listing of all proposed commercial and industrial waste streams;

5. The following details on the bulking agent to be used at the site:

    - Details as to the nature and source of the bulking agent that is to be used to absorb liquid waste material that is proposed to be brought to the site;

    - Clarification as to the absorption properties of this material;

    - Quantities and location of stockpiles of this material to be kept at the site;

    - Analysis of any potential hazards associated with stockpiles of the bulking material.

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6. Details of proposed cleaning regime of both the liquid waste troughs and concrete areas where liquid waste and bulking agents are to be moved throughout the site in the bucket of a front end loader. The cleaning regime is to demonstrate how grease and fat residues will not build up in these locations to potentially cause odour nuisances or to acerbate the presence of flies and other nuisance insects. In addition it will demonstrate that fats, grease and other nutrients will not be conveyed with rainfall to the sedimentation pond potentially causing it to become anaerobic;

7. Details as to the proposed cleaning regime for the receivals shed floor demonstrating how the cleaning will minimise potential odours and the potential for health issues for workers in this part of the composting operation;

8. A statement as to the potential of the development to be associated with the transmission of Leptospirosis;

9. Details of the proposed breakdown procedures for the composting aeration system which outlines how these procedures can be implemented before the onset of anaerobic conditions within the composting material;

10. The traffic impact statement submitted within the EIS is to provide a comprehensive analysis of the traffic movements associated with the transportation of the finished product from the site.

Council request your prompt reply to this request for additional information and advises that your application will be held in abeyance pending the submission of the requested information.

Should you wish to discuss this matter further please do not hesitate to contact the undersigned on 6044 8928 during normal office hours.

Yours faithfully

Colin Kane
Director Environment & Planning
GREATER HUME SHIRE COUNCIL

7 December 2012

Issues raised	***Response***
1. Detailed costings endorsed by a quantity surveyor or other suitably qualified independent person justifying the estimated cost of the development which was given as $8.5 million dollars;	Comment: Clause 255 of the *Environmental Planning and Assessment Regulation 2000* provides – *255 **How is a fee based on estimated cost determined?*** *(1) In determining the fee for development involving the erection of a building, the consent authority must make its determination by reference to a genuine estimate of:* *(a) the costs associated with the construction of the building, and* *(b) the costs associated with the preparation of the building for the purpose for which it is to be used (such as the costs of installing plant, fittings, fixtures and equipment).* *(1A) In determining the fee for development involving the carrying out of a work, the consent authority must make its determination by reference to a genuine estimate of the construction costs of the work.* *(1B) In determining the fee for development involving the demolition of a building or work, the consent authority must make its determination by reference to a genuine estimate of the costs of demolition.* *(2) The estimate must, unless the consent authority is satisfied that the estimated cost indicated in the development application is neither genuine nor accurate, be the estimate so indicated.* It is assumed that Council considers that the estimated cost indicated in the development application being $8.5M is neither genuine nor accurate, however I confirm based on information provided to this firm from RP Design (building construction costs), Esler & Associates (Civil construction costs), and Cleanaway (installation of plant, fittings, fixtures and equipment) that the estimated cost indicated in the development application of $8.5M is both genuine and accurate.
2. An expansion of the information provided as to why other alternate sites particularly those that may have had an industrial zoning were	Comment: Other sites considered which had an 'industrial' zoning, whether located locally in Albury/Wodonga in NSW or Victoria, were not considered feasible as suitable locations for the Proposal primarily due to limited land area available at the time investigations were

Issues raised	*Response*
not considered to be a feasible location for the proposed development;	carried out. For example, many lots were available in the 2,000 square metre to 1 hectare range, with few available in the 1 hectare to 2 hectare range, but almost nil available in the 5 hectare range required (being available as individual lots or as contiguous lots in land holdings).
3. *Further analysis as to how the proposed development is in the public interest of those persons that live in the local area surrounding the site of the proposed development;*	Comment: Firstly, reference is made to the common law meaning of "public interest" under section 79C(1)(e) of the *Environmental Planning and Assessment Act 1979* which, in the case of the premise of the issue raised, is not confined to the interests of one group of people over other people or certain people residing in an area over people residing elsewhere. Analysis of the "public interest" of the Proposal is set out in the Environmental Impact Statement (EIS) at Section 22.1.8 (p. 22-4), and a summary of the public interest need for the Project is set out in the EIS at Section 5.3 (p. 5-8), as follows – ***5.3 Summary of project need*** *In summary, the project assists in satisfying a need to take action to lift resource recovery rates in the Albury-Wodonga region and to reduce waste going to landfill at the Albury Waste Management Centre.* *It addresses the current short-fall in resource recovery rate in the area (average 38%) compared to the 2014 targets set out in the NSW Waste Avoidance and Resource Recovery Strategy 2007 and Victorian Towards Zero Waste strategy of 66% and 65% respectively. It is estimated that recovery rates in the area would be lifted to an average of 65% following implementation of the project. This represents a significant strategic justification for the project* [and is significantly in the public interest]*.* *The project would also divert up 40,000 tonnes per year of waste from landfill, thus contributing to the 'Halve Waste – Reduce, Reuse, Recycle' objective of halving the amount of waste going into the Albury Waste Management Centre by 2014.*

Issues raised	*Response*
4. An itemised listing of all proposed commercial and industrial waste streams;	Comment: Refer to Table 10.1 in the EIS (p. 10-1). Approximately 12.5% of waste input will be liquid waste. Components of this waste are estimated as follows: • yeast wastes; • DAF foams (dissolved air flotation fatty and non-fatty foams); • grease trap waste; • waste syrups; • contaminated whey; • waste batter; • contaminated permeate; • waste fruit (and other) juices; • waste sauces and soups; • yoghurt; and • ice cream. Approximately 20% of waste input will be food waste. Components of this waste are estimated as follows: • bakery waste; • cereal waste; • out of specification food products; • fruit waste; • vegetable waste; • spoiled food; and • restaurant food waste.

Issues raised	*Response*
	It is noted that liquid waste will arrive at the Site spread out over the year via small and intermittent consignments, which will be received, promptly processed, and incorporated in composting material within hours of arrival. Large quantities of liquid waste will neither accumulate on site nor be held on site.
5. The following details on the bulking agent to be used at the site:	
• *Details as to the nature and source of the bulking agent that is to be used to absorb liquid waste material that is proposed to be brought to the site;*	Comment: The nature of the 'bulking agent', as explained in the EIS (pp. 6-19; 10-2), is organic garden waste such as lawn clippings, leaves, stems, branches, wood chips, fibrous chipped material, paper waste, sawdust, straw, vines, etc. Pre-made coarse compost will also be extensively used owing to its excellent absorbency, good porosity, and its high microbial content. When increased porosity is required, coarse woody fractions from the compost screening process will be used.
• *Clarification as to the absorption properties of this material;*	Comment: Absorption properties will be sufficient to bind with liquid waste so as to provide a workable and reliable processing medium for shredding, mixing, and general composting purposes. Shredded garden waste, the components listed above, and pre-made compost all have excellent absorbency of both polar (water-based) compounds and non-polar (oil-based) compounds. (The chemical basis for this is well established.) The high solid-to-liquid blending ratio ensures all liquid is fully absorbed and the resultant mix does not contain more than approximately 60% liquid. In this medium or form, the mix is solid with no liquid dripping or oozing from the material.
• *Quantities and location of stockpiles of this material to be kept at the site;*	Comment: 'Green waste' will only be delivered to, processed, and stored within the proposed Receivals Shed and the Screening Shed. Quantities will vary but will not exceed approximately the quantities set out in the EIS at Table 10.1 (p. 10-1). Feedstock is not stockpiled: it is processed and incorporated into covered compost heaps on the same day

Issues raised	*Response*
	it is received. This also applies to un-composted bulking materials. Supplies of pre-made compost (which is environmentally benign) will always be available for use on site.
• *Analysis of any potential hazards associated with stockpiles of the bulking material.*	Comment: Nil 'hazards' identified in the EIS given delivery to, processing in, and storage within the Receivals Shed and the Screening Shed (EIS Table 7.2, pp. 7-5 - 7-12).
6. *Details of proposed cleaning regime of both the liquid waste troughs and concrete areas where liquid waste and bulking agents are to be moved throughout the site in the bucket of a front end loader. The cleaning regime is to demonstrate how grease and fat residues will not build up in these locations to potentially cause odour nuisances or to acerbate the presence of flies and other nuisance insects. In addition it will demonstrate that fats, grease and other nutrients will not be conveyed with rainfall to the sedimentation pond potentially causing it to become anaerobic;*	Comment: The main reason why liquid waste is mixed with solid bulking material is to absorb it and hold it in a porous matrix to enable composting to effectively and efficiently occur. The proportion of liquid-to-solid is controlled to ensure the final compost mix is solid and that all liquid is 'mopped up'. The mix is not sloppy and does not leak liquid. Its capacity to spill and accumulate on working surfaces is therefore no more than when handling normal solid composting feedstock. The working surfaces of the site are concrete and asphalt and all surfaces are routinely cleaned at the end of each working day. Cleaning involves mechanical sweeping followed by localised low volume, high pressure hot water blasting, if and when required. Residual water is 'mopped up' into relatively dry pre-made adsorbent compost which is re-incorporated into the composting process. All mixing and processing areas are under roof cover and therefore are not subject to being wet by precipitation nor to waste organics being washed into the Site's civil engineered 'MUSIC' and 'DRAINS' modelled and designed stormwater drainage system.
7. *Details as to the proposed cleaning regime for the receivals shed floor demonstrating how the cleaning will minimise potential odours and the potential for health issues for workers in this part of the composting operation;*	Comment: As detailed above, the receivals shed floor is concrete and will be routinely cleaned at the end of each working day by mechanical sweeping and localised high pressure, low volume hot water blasting, if and when required. No material will be allowed to accumulate in any corners or under machinery where it could be a source of odour or insect or animal infestation.

Issues raised	*Response*
8. A statement as to the potential of the development to be associated with the transmission of Leptospirosis;	Comment: If an organic composting facility is operated and managed poorly, there are potentially 19 human diseases that could be contracted by staff – Leptospirosis is but one. Transpacific Cleanaway is well aware of these human health issues plus many other OH&S concerns associated with composting operations. The company's AS 4801 certified OH&S policy contains staff induction, training, and awareness procedures. Professional operation of the site and specific mitigation measures (such as dust suppression, maintaining good site hygiene, using personal-protective-equipment and keeping inoculations current) will reduce the risk of contracting disease to a very low level; lower, in fact, than what a farmer or an agricultural worker is known to be typically exposed to.
9. Details of the proposed breakdown procedures for the composting aeration system which outlines how these procedures can be implemented before the onset of anaerobic conditions within the composting material;	Comment: Each aerated pad has its own fan and the aeration system is not complex. A failure of one pad will affect only that pad and not others. If a fan does fail (not expected but cannot be ruled out), it can be replaced within hours (the fans and their motors are of generic design). If the electronic control system fails, there is a physical over-ride that allows the system to be run manually. If there is a reticulated electrical power outage, a generator can be brought on site and connected within hours. All primary systems (fan power supply and oxygen and moisture levels) can be remotely monitored via landline or mobile telephone link with automatic alarm alert settings should any system fail or fail to operate within predetermined parameters. The main issue here is just how long can the system be down before the process becomes anaerobic and then starts producing offensive odour? As the decomposition is microbiological, the switch from aerobic to anaerobic occurs gradually over about a day and a half. Only then do offensive odour compounds start to build up. After about another day, offensive odour would become noticeable within the heap. However, the actively composting heaps are all covered in Gore™ cover membranes which prevent odorous compounds (whether offensive to the human nose or not) from escaping. This will give a further day's grace and only after this will leachate begin to start seeping out from the front of the heaps. In practical terms,

Issues raised	*Response*
	this gives about three or four days grace. The system would be made operational long before this. In this respect, the Gore™ cover technology is very robust in controlling potential offensive odour.
10. The traffic impact statement submitted within the EIS is to provide a comprehensive analysis of the traffic movements associated with the transportation of the finished product from the site.	Comment: The Traffic and Transport Assessment at Appendix J of the EIS provides a comprehensive analysis of the traffic movements associated with the transportation of product from the site with the recommendation that, together with all other traffic movements, the measures listed at Section 6.2 (pp. 28-29) be implemented.

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