



Submission to Southern JRPP – Proposed Resource Recovery Facility (Organic Composting)

**“Kalawa” 92 Paterson Road
GEROGERY**

DA Number: 42-12/13 Infrastructure

**Prepared on behalf of the elected council of
Greater Hume Shire**



This Report has been prepared for:

**The elected council of
Greater Hume Shire**

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Environment Design Management

Town Planning Surveying Engineering Environmental Planning Building Design Project Management

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1 INTRODUCTION

At its meeting of 31 July 2013 the elected council of Greater Hume Shire (“the Council”) resolved to lodge an objection to DA Number: 42-12/13 in respect of an Organic Composting Facility proposed to be located at “Kalawa” 92 Paterson Road, Gerogery on the following grounds, namely:

- *no proper or adequate analysis of feasible alternative sites for carrying out the development has been provided.*
- *the development will have an unreasonable impact on the local road network, particularly as a result of increased traffic generation.*
- *the development will have an unreasonable adverse odour impact on residents and occupiers of premises in the locality.*
- *the development will have an unreasonable adverse social impact on residents in the locality.*
- *the operation of the development will have an unreasonable impact on the existing amenity of residents and occupiers of premises in the locality.*
- *the development will have an unreasonable impact on water in the locality.*
- *the proposal is deficient in respect of a range of operational issues such as fire management, stockpiling and storage of material and management of noise wholly within the property boundaries.*
- *there is no proper or adequate consideration of site closure and rehabilitation in the event of future closure of the facility.*
- *the development is not in the public interest.*
- *the proposal is contrary to the objects of the Act in that it will not result in an orderly planning outcome.*

EDM Group has been engaged by the Council to prepare this submission to the Southern JRPP to further elaborate upon its stated position. A Statement of Expertise to prepare this submission is attached at Appendix 1.

The basis of this objection follows a thorough review of the EIS Vol. 1 – Main Report and Vol. 2 – Appendices prepared by GHD.

Consideration has also been given to:

- various correspondence prepared by Blueprint Planning on behalf of the proponent;
- comments received from Referral Authorities;
- submissions received from the general public; and
- various reports prepared by consultants engaged by objectors to the proposal.

A list of documents supplied for consideration is provided at Appendix 2.

This submission also relies heavily on the EPA (NSW) *Environmental Guidelines – Composting and Related Organics Processing Facilities* (2004)¹ prepared by the Waste Management Section of the Department of Environment and Conservation (DEC). It is to be noted that inexplicably these Guidelines appear to be largely unreferenced in the EIS and supporting documentation supplied by the proponent.

¹ The DEC Guidelines (2004) are included within the Department of Planning Register of Development Assessment Guidelines. <http://www.planning.nsw.gov.au/LinkClick.aspx?link=207&tabid=80> The focus of these guidelines relates to the appropriate environmental management of organics processing facilities.

2 PROPOSAL

Briefly, it is noted that the proposal is to receive up to 40,000 tonnes of organic waste which is intended to be processed and converted to approximately 18,000 tonnes of compost material. Material would be sourced from:

- kerbside collections within the neighbouring local government areas of Albury City, City of Wodonga, Indigo Shire and Corowa Shire;
- bulk transfer station drop offs (garden waste); and
- commercial and Industrial liquid organic and food waste material.

As noted from EPA (NSW) Guidelines² the organic material to be received at “Kalawa” can be considered as ranging from relatively low environmental impact (eg garden organics) through to material of relatively higher potential for impact including meat, fish and fatty foods.

Potential to have environmental impact	Organics category	Types of organics permitted in categories ¹ (Categories with larger numbers may contain types from classes with smaller numbers.)	
		Type	Examples of organics
Lowest potential environmental impact	Category 1	Garden and landscaping organics	Grass ² ; leaves; plants; loppings; branches; tree trunks and stumps
		Untreated timber	Sawdust; shavings; timber offcuts; crates; pallets; wood packaging.
		Natural organic fibrous organics	Peat; seed hulls/husks; straw; bagasse and other natural organic fibrous organics.
		Processed fibrous organics	Paper; cardboard; paper-processing sludge; non-synthetic textiles.
Greater potential environmental impact than Category 1, less potential impact than Category 3.	Category 2	Other natural or processed vegetable organics	Vegetables; fruit and seeds and processing sludges and wastes; winery, brewery and distillery wastes; food organics excluding organics in Category 3.
		Biosolids ³ and manures	Sewage biosolids, animal manure and mixtures of manure and biodegradable animal bedding organics.
Greatest potential environmental impact	Category 3	Meat, fish and fatty foods	Carcasses and parts of carcasses; blood; bone; fish; fatty processing or food.
		Fatty and oily sludges and organics of animal and vegetable origin	Dewatered grease trap; fatty and oily sludges of animal and vegetable origin.
		Mixed residual waste containing putrescible organics	Wastes containing putrescible organics, including household domestic waste that is set aside for kerbside collection or delivered by the householder directly to a processing facility, and waste from commerce and industry.

Notes:

1. These categories are used only to facilitate reference to these groupings of waste and organics (with different potential environmental impacts) in these guidelines and in environment protection licences: they are not used in waste legislation.
2. Particular care should be taken when grass clippings are present in the feedstock. It is well known that careful process management is required to mitigate odour and leachate problems when processing grass clippings (e.g. Buckner 2002). High moisture content, high nitrogen levels, abundance of readily available organic matter and poor structure and tendency to mat mean that grass can easily become anaerobic and odorous.
3. Conditions applying to processing and use can be found in *Environmental Guidelines: Use and Disposal of Biosolids Products* (EPA 1997).

Table 1: Categorisation of Organics (DEC 2004)

² DEC (NSW) 2004 *Environmental Guidelines – Composting and Related Organics Processing Facilities* [Online] URL:- http://www.environment.nsw.gov.au/resources/waste/envguidlins/composting_guidelines.pdf [Accessed 5 August 2013]

3 REVIEW OF ALTERNATIVE SITES

Contrary to the NSW Department of Planning EIS Guidelines ³ and further to the requirements of the Director-General ⁴, there has been little or no priority given to a thorough evaluation of alternative sites.

It is also noted that as the development can be regarded as a “Potentially Offensive Industry” that the provisions of SEPP 13 – Hazardous and Offensive Industries also apply. Among other things Clause 13 of the SEPP requires an analysis of feasible alternative locations for the development.

Notwithstanding the above, the EIS supporting documentation has only, at best, given the most cursory of attention to this important issue.

At Section 5.4 of Vol.1 of the EIS it is stated that the proponent simply undertook a “general review” to identify potential locations for the facility including:

- “Kalawa” at Gerogery;
- two (unidentified) sites at Ettamogah; and
- several (unidentified) sites at Bowna and Bungowannah.

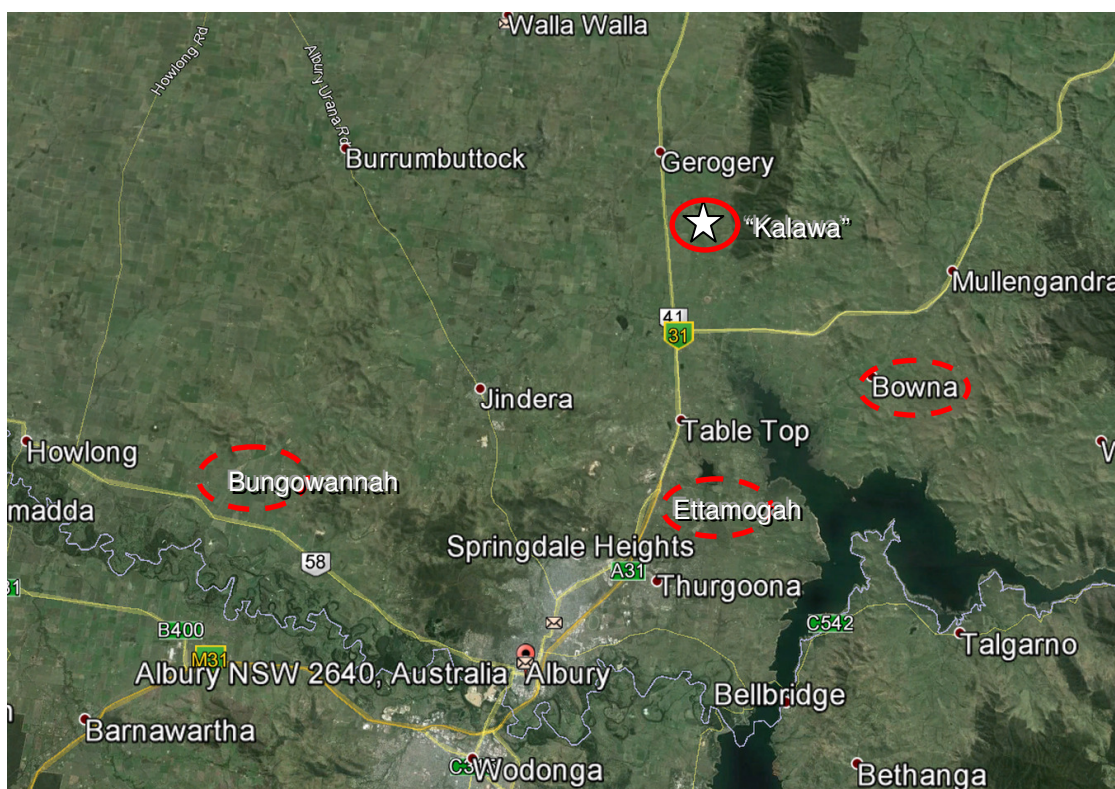


Figure 1: General location of alternative sites (Map source: Google Earth)

The preferred site at “Kalawa” was apparently selected because it:

- *satisfied the proponent’s selection criteria;*
- *was a suitable size;*

³ DUAP (1996) *EIS Practice Guideline: Composting and Related Facilities* [Online] URL:- http://www.planning.nsw.gov.au/rdaguidelines/documents/Section_E_Composting.pdf (Accessed 5 August 2013)

⁴ Department Planning & Infrastructure letter dated 2 August 2011

- *had good access to the regional transport network; and*
- *was available and at agreeable terms.*

Part 3 of the abovementioned EIS Practice Guideline deals with site selection principles. It calls for a “systematic and rigorous approach” to site selection based on identified locational principles.

Quite clearly the above description of the proponent’s review process not only falls far short of any reasonable comprehensive analysis but also lacks transparency providing no real insight to the eventual selection of the preferred site.

Indeed it may well be the case, in the absence of evidence to the contrary, that ‘Kalawa’ was actually the only site under serious consideration and that the so called review of alternative sites has been no more than a cursory exercise to try and satisfy the Director-General Requirements.

For instance, in support of such a contention, it is to be clearly noted from the EIS that none of the alternative sites have actually been identified to allow the Determining Authority an opportunity to evaluate this part of the development process. [NOTE: The “do nothing” option is also dealt with brevity in only four (4) short dot points at Section 22.1.2 of the EIS (Vol 1)].

No decision matrix has been provided to gauge the relative weight of important selection characteristics such as site availability, existing and adjacent land use, visual impact, avoidance of agricultural lands of high capability and/or quality, ecological disturbances, local geology and hydrogeology, infrastructure, access, economic aspects, distance from the principal waste resource and so on.

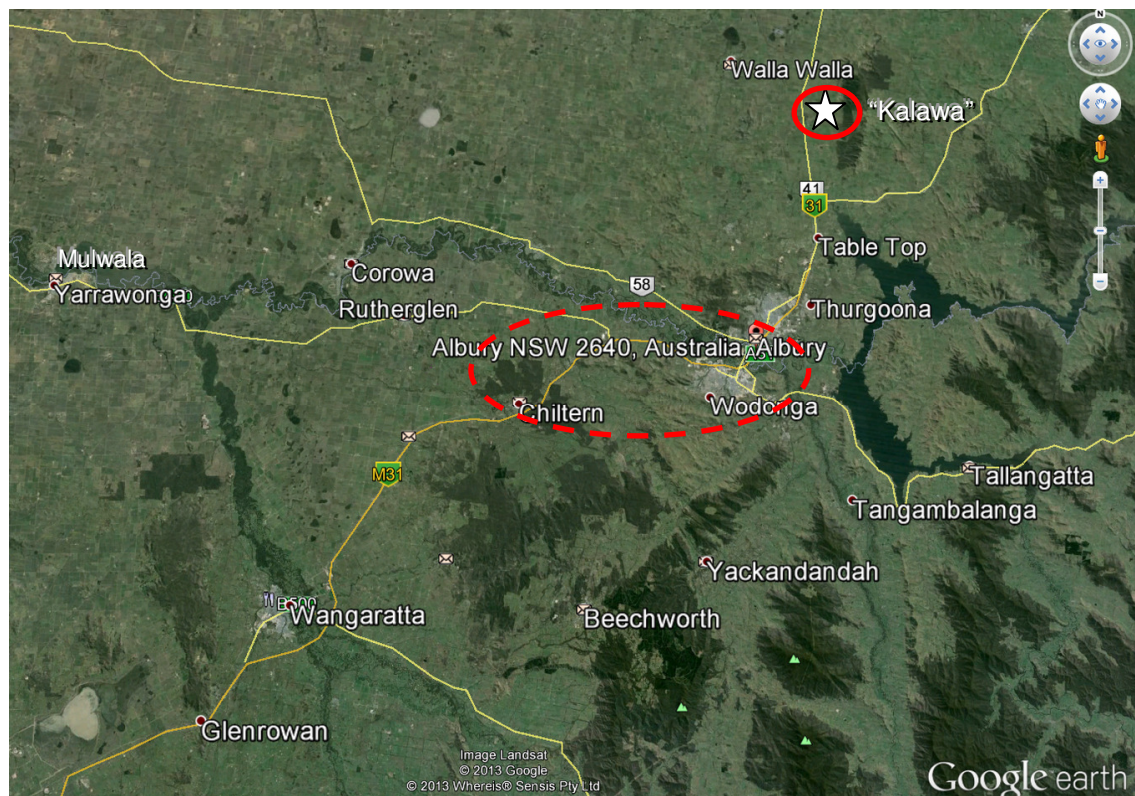


Figure 2: Possible alternative investigation area (Map source: Google Earth)

In addition, obvious glaring omissions from the potential review locations include any sites more centrally located within the regional waste area itself, such as:

- Albury Waste Management Centre, Centaur Road, Lavington
- Possibility of expansion of the test site in Wodonga
- Any location within the northern or western areas of Indigo Shire.
- Any location in the western area of Wodonga – [Note: For example with the support of Wodonga City Council a large site requiring suitable buffers for noise and odour and with good access to the regional road network was found for the proposed Northern Victorian Livestock Exchange off the Murray Valley Highway at North Barnawartha.]

As noted at Figure 2 the preferred site is relatively remote from the central area of the regional collection area and as the preferred destination will result in a significant travelling distances from collection points such as Corowa / Wahgunyah (over 60kms), Beechworth (over 70km) and Mulwala (over 100km).

It is also assumed that all containments will also need to be transported back to Albury over 30km to the Albury Waste Management Centre.

No cost / benefit analysis has been provided to demonstrate the regional efficiencies to be gained in removing organic material from the regional collection area to a location within an adjoining Council area to the north of Albury.

There is also no comparison of sustainability gains in selecting the Gerogery site over a more central location to the collection population.

Lastly, in considering likely selection criteria against the site characteristics of “Kalawa”, there would seem to be no particularly significant attributes that are peculiar to this site that would not be readily available across many locations within the regional collection area. Such a fundamental criteria that would be expected to be considered are

- need for a facility to be appropriately sited (eg adequate buffer distances can be provided between the facility and other sensitive land uses);
- that groundwater and surface water can be protected from contamination (eg, compost heaps and other material stockpiles can be readily set up on a non-permeable base to prevent leachate contamination); and
- aspects such as traffic, odour, noise, pests, birds, litter and other amenity impacts can be contained to acceptable levels.

On this basis it is difficult to see what the great attraction of “Kalawa” actually is apart perhaps from the fact that the land was readily available for lease.

As a consequence it is the Council’s opinion that there has been an inadequate appraisal of the merits of other sites, supporting a conclusion that there has been a perceived bias in the manner in which the proponent undertook it’s so called “general review” of other alternative locations.

There is certainly no evidence provided to the contrary that would indicate that any of the alleged alternative general review sites were actually thoroughly canvassed prior to the preferred site being selected.

Based on the lack of information supplied by the applicant in regards to this critical component of site selection, The Council has no confidence in the assertion that this site represents a logical, efficient, sustainable and best

practice outcome. Rather, it is the Council's contention that no proper or adequate analysis of feasible alternative sites for carrying out the development has been provide.

Having regard to the above the elected council objects to the development on the basis that the EIS is deficient with no proper or adequate analysis of feasible alternative sites for carrying out the development having been provided.

4 TRAFFIC

The traffic analysis as outlined at Appendix J of the EIS and as further elaborated upon within the Attachment to the Blueprint Planning and Development letter dated 26th February, 2013 focuses primarily on the Cleanaway truck movements required to transport material to the site and trucks removing processed material. The report however, makes little or no allowance for additional traffic including:

- Operational and staff vehicles
- Visitor traffic including bus traffic
- Delivery vehicles associated with the 5,000 tonnes of commercial liquid waste (i.e. 12.5% of deliverables by volume)
- Vehicles associated with the removal of contaminants
- Outward bound (empty delivery trucks) movements (22 truck movements per day)

Further it is also noted within NSW Roads and Maritime Services correspondence dated 21st June, 2012 that the current approval for the quarry operation may need to be modified so as to alleviate concerns regarding the intersection of Rogers Road (East) and Olympic Highway. It is unclear from the EIS or any additional documentation supplied as to whether this “concern” needs to be or has been adequately addressed in the Traffic Assessment.

In addition general concerns raised by the Council in respect of the design configuration and proximity of the intersections of Rogers Road (East) with Paterson Road and Rogers Road (East) with the Olympic Highway are also alluded to in additional comments received from NSW Roads and Maritime Services (12 April 2013).

There is also little or no discussion in respect of increased truck movements across narrow local rural roads with deliveries that originate from the western areas of Corowa Shire.

An additional concern has also been raised in respect of fog impacting upon intersection safety. During winter months, persistent fog is not an uncommon occurrence and road safety is likely to be exacerbated by slow turning vehicles entering/leaving Rodgers Road (East) from/to the Olympic Way. The RMS suggestion that delivery times will likely need to be modified under such circumstances will clearly have significant operational impacts if implemented.

A consent authority has a duty to satisfy itself that reasonable environmental standards can be met. It cannot be so satisfied on the basis of the suggestion that design measures will be undertaken as part of a detailed management plan.

This significant safety issue remains unresolved.

Having regard to the above the elected council objects to the development on the basis that the development will have an unreasonable impact on the local road network, particularly as a result of increased traffic generation.

5 ODOUR

The issue of Odour has generated a considerable body of information, both for and against the proposal. While there appears to remain a lack of scientific consensus on the expected odour levels to be generated, there doesn't appear to be any argument against the conclusion that the proposal will generate odours.

From the Council's perspective, the key point of contention is whether odours generated are likely to be a source of nuisance within the community.

The following concerns are raised in respect of this issue:

- (i) EIS Appendix D places a heavy reliance on EPA (Vic) *Environmental Guidelines for Composting* (1996).⁵ These Guidelines are however only applicable in cases of facilities receiving less than 36,000 tonnes per annum.
- (ii) The more appropriate EPA (Vic) Guidelines to refer to are in fact "*Separation Distances for Large Composting Facilities* (2012)"⁶. While an earlier draft version of these Guidelines is referred at page 15 of the EIS Appendix D, the recommendations are not alluded to.
- (iii) That is, these 2012 Guidelines indicate that the key criteria in respect of separation distances (or buffers) is that for routine conditions, facility design should be based on 1 odour unit at and beyond the boundary. The buffer default for facilities receiving up to 55,000 tonnes + is 800m.
- (iv) The GHD odour modelling as referenced at Appendix D clearly demonstrated however at the northern boundary 7 odour units and 2 odour units beyond the northern, eastern and south eastern boundaries.
- (v) The revision of these modelling outcomes (Blueprint Planning letter dated 13 June 2013) apparently as a consequence of odour sampling at Gore sites in Timaru NZ and Wodonga, now conveniently confines the 2 odour unit contour within the property boundary. [Note: the above mentioned EPA (Vic) Guidelines specify one (1) odour unit.]
- (vi) **While Council is unable to confirm the rigour of this latest assessment legitimate concerns remain that the EPA Condition O1.1 is virtually impossible to enforce namely:**

The licensee must not cause or permit the emission of offensive odours beyond the boundary of the premises.
- (vii) It is to be noted however, that this EPA condition is wholly consistent with the DEC Guidelines (2004) which set as an Objective:

No emissions of offensive odours outside the boundaries of the premises.
- (viii) **In considering the revised odour modelling based on Timaru NZ and Wodonga it also to be noted that an important conclusion that can be drawn from the DEC Guidelines (2004) is that no two compost facilities will necessarily operate in the same manner.**

⁵ EPA Vic (1996) *Environmental guidelines for composting and other organic recycling facilities* Pub. No. 508 [Online] URL <http://www.epa.vic.gov.au/~media/Publications/508.pdf> (Accessed 5 August 2013)

⁶ EPA Vic (2012) *Separation Distances for Large Composting Facilities* Pub No. 1495 [Online] URL <http://www.epa.vic.gov.au/~media/Publications/1495.pdf> (Accessed 5 August 2013)

- (ix) Apart from site topography and local meteorological characteristics the Guidelines also note that

The types and quantities of organics received and the design and siting of the processing facility determine the nature of potential pollutants that can be generated and the severity of the potential environmental risks, as well as the quality of the end-products.

Poor environmental management of composting and related organics processing facilities can result in one or more of the following environmental problems:

- *air quality impacts, namely odours and particulate matter*
- *potential hazards, such as fire and explosions*
- *water and soil pollution*
- *loss of amenity, particularly odours, the presence of vermin in excessive numbers, excessive levels of noise from equipment (such as shredders and traffic), wind-blown litter and particulate matter from delivery trucks and earthmoving equipment*
- *production of contaminated organic products.”*

- (x) In relying on such data however the Guidelines require that a decision needs to be reached that:

- *the conditions are comparable*
- *the system has been operating long enough for its possible consequences to be known*
- *the prospective occupier can duplicate the system that is used*
- *the system works to achieve the desired outcome*
- *there is no opposing evidence*
- *the proposal is compatible with other aspects of the composting and related organics processing facility operation, and*
- *the technique is benign to the environment with respect to all other environmental objectives.*

- (xi) **There is no evidence supplied by the proponent that any of these considerations have been factored into the analysis and conclusions provided to date.**

- (xii) The DEC Guidelines (2004) also provide various design requirements including the following:

Details of the likely incremental increase in odour impacts must be given in an impact assessment report for odour. This report must be prepared in accordance with the Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (EPA 2001a).⁷

- (xiii) It is noted that the first reference to these modelling requirements appears to be within the Blueprint Planning letter dated 13 June 2013.

- (xiv) **The Council is unable to verify whether this omission from the original EIS has any bearing on the subsequent conclusions now being drawn by the proponent.**

⁷ DEC (NSW) 2001 *Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW* [Online]
URL: <http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf> [Accessed 5 August 2013]

- (xv) In addition to the above and as identified by Simon Leake Compost Scientist, the significant possibility for the overflow dams to be a source of odour also continues to be overlooked within documentation supplied by the proponent to date. As a minimum requirement it is expected by the Council that any overflow dams be fitted with appropriately sized aerators.
- (xvi) As noted within the EIS the primary source of odour is when material becomes anaerobic. The GHD letter of 8th March 2013 also states that “*regardless of the specific composition, the composting process involves keeping the material aerobic at all times*”.
- (xvii) **It is unclear from the documentation however, what impacts (if any) will be likely attributable to material that has already started composting and/or has already started turning anaerobic prior to delivery, particularly within bins from the kerbside collection process.**
- (xviii) The DEC Guidelines (2004) note:

The absence of odours does not necessarily indicate that the process has not turned anaerobic: odours may be diminished or removed during diffusion of the biogas mixture through fresh compost, odour scrubbers or soil containing biological organisms. However, the presence of unpleasant odours is a good indicator that the process has turned anaerobic.

If calm conditions are likely to occur frequently, the topography and consequent drainage flows of air can have a profound effect on the dispersion of odours, the extent and intensity of odours and, consequently, the impact on local amenity. Calm conditions are most likely to occur in the morning and evening. Locations likely to cause least dispersion are those that have a predictable air drainage flow and no sea breezes or other winds to disturb the stable wind conditions. In this regard, the worst times of the year for odour dispersion are likely to be late autumn and winter.

High peak odour emissions at composting and related organics processing facilities generally occur during mixing and aeration procedures, such as preparation of the feedstock, and during turning of biodegrading organics. Rapidly biodegrading organics (i.e. Category 3 organics in Table 3, Section 3), such as food and animal organics, may already be giving off odours when they are received at the facility or soon after receipt. Other less biodegradable organics, such as Category 1 organics, are less likely to generate odour when received at the facility.
- (xix) Apart from the DEC Guidelines (2004) national guidelines have also been developed by the Waste Management Association of Australia - Compost Australia Division ⁸. These Best Practice Guidelines were designed to assist composters to plan composting facilities that process source-separated organic waste. As is the case with the DEC Guidelines (2004) these National Guidelines are also unreferenced within the EIS.
- (xx) The National Guidelines note among other things that odour is the most likely source of complaint for a composter and that any strategy for minimisation of odour generation must take into account the following:
 - *selection of appropriate technology*
 - *type of raw materials and their odour content on receipt*
 - *method of receipt, storage and mixing of raw materials*
 - *mix ratios of raw materials*
 - *management and monitoring of the composting and curing processes.*

⁸ WMAA National Technical Committee for Organics Recycling (2004) *Best Practice Series: Composting* [Online] URL <http://www.wmaa.asn.au/> [Accessed 5 August 2013]

- *management of leachate*
- *screening of fresh composts*
- *collection and extraction of odorous air from various sources (receival, mixing, composting) and appropriate means of deodorising exhaust air*

(xxi) Balanced against the submissions of GHD and Blueprint Planning are the expert statements of Simon Leake Compost Scientist ⁹ and ERM Australia ¹⁰. Also noted are the original concerns raised by EPA (NSW) such as expressed within their letter of 21 May 2013.

(xxii) **Lastly, it is also to be noted that there is no clear evidence of proposed contingency measures in the event that assumed odour rates are not achieved.**

Having regard to the above it is submitted that the legitimate concern of the Council is that it finds itself in an invidious position where it either simply acknowledges and agrees with the proponent's revised submissions or it accepts the statements to the contrary.

From the evidence supplied to date it cannot be repudiated that there will be times when odours from the facility are noticeable in the local area. This seems to be agreed by the parties although the level of odour and frequency remains in dispute between the proponent, EPA and objector parties.

The level and frequency of these odours, even if they are 'natural' and comply with the EPA guidelines, will likely result in complaints to Greater Hume Shire Council and the EPA. Although potential complaints may not necessarily be particularly vehement or numerous on an objective technical assessment they may however not be insignificant on rural living, social and amenity grounds.

The Council remains unsatisfied on the current evidence that the proponent could operate its proposed composting facility at the stated production and not on occasions cause odour levels in the vicinity of the site which could lead to justified odour complaints.

On balance therefore in the absence of scientific consensus the Council has no other viable option other than to adopt the precautionary principle. That is, as a suspected risk of causing the emission of offensive odours beyond the boundary of the premises remains, then the proposal should be regarded as harmful. As a consequence the burden of proof that it is not harmful falls completely on the proponent. To date this proof has not been provided to the satisfaction of the Council.

Having regard to the above the elected council objects to the development on the basis that:

- **the development will have an unreasonable adverse odour impact on residents and occupiers of premises in the locality.**
- **the operation of the development will have an unreasonable impact on the existing amenity of residents and occupiers of premises in the locality.**

⁹ Leake S (2013) *TransPacific Cleanwvay Organic Composting Facility Proposal – Submissions on behalf of Resident Objectors – July 2013* (unpublished)

¹⁰ ERM Australia (2013) *Gerogery Resource Recovery Centre Odour Assessment Review* (July 2013) ERM Ref:0208046RP1 (unpublished)

6 WATER

The EIS Report States that “*The composting process would not generate any wastewater*”. However from a reading of the EIS Soil and Water Assessment Report (Appendix F) a number of issues are raised:

- (i) There is no clear explanation of the Water Balance Model relied upon. Such modelling should include all water movement on site including roof water, surface water, liquid effluent, etc.
- (ii) There is a lack of detailed analysis associated with the preliminary water balance that would readily support the contention that a 3.7ML of active storage would be adequate.
- (iii) Rainfall data has apparently relied on BOM data ¹¹ from the meteorological station situated at Hume Reservoir (Site No. 72023) which is situated 10.7km to the east of Albury and 27km south of “Kalawa”.
- (iv) Critical to any water balance is reliable evaporation data. Without reliability with the input data, the calculations become more difficult. Significant distances between a study site and the weather station also decreases confidence in the data. This coupled with intrinsically different site characteristics is also likely to result in an evapotranspiration regime that is different to the weather station data.
- (v) As a consequence it would be far more appropriate in this case to instead rely on a water balance model that used extensive data generated by SILO ¹².
- (vi) The DEC Guidelines (2004) require that before site establishment a comprehensive hydrological investigation of both site and the surrounding groundwater and surface water bodies should be conducted. At Appendix 3 of this submission is an outline of the minimum requirements for a Water Assessment Plan.
- (vii) Although Appendix F makes reference to the DEC Guidelines (2004) in respect of retention volume, there is no discussion in relation to the following:
 - *Putrescible organics have a tendency to generate leachates that need careful management.*
 - *Leachates from composting and related organics-processing facilities have the potential to pollute groundwater and surface water bodies (such as rivers, creeks and dams). They can be high in nutrients; this makes them favourable host media for bacteria and other microorganisms and gives them a high biological oxygen demand (BOD).*
 - *Surface water run-off from composting and related organics-processing facilities can cause unacceptable loads of sediment and suspended solids in receiving waters, while surface water run-on can lead to excessive generation of leachate. Unvegetated exposed areas are a likely source of suspended sediment in surface water.*

¹¹ BOM Climate statistics for Australian locations http://www.bom.gov.au/climate/averages/tables/cw_072023.shtml

¹² SILO is an enhanced climate database hosted by the Science Delivery Division of the Qld Department of Science, Information Technology, Innovation and the Arts (DSITIA). (<http://www.longpaddock.qld.gov.au/silo/> - [Accessed 5 August 2013]). It provides data for a 5km by 5km grid across Australia with interpolated data of rainfall and evaporation values from surrounding climate stations to provide a long term data set for the specific location. It could be used to obtain at least 100 years of daily climate data for the development site.

Surface water control

The surface water controls must at least meet the following requirements:

- *The facility must be designed to prevent surface water from mixing with the organics received and processed at the premises and the final products, process residuals and contaminated materials stored at the premises.*
- *All water that has entered processing and storage areas and water that has been contaminated by leachate must be handled and treated in the same manner as leachate.*

(viii) **If approved the composting area must have a controlled drainage area from which all clean rainfall runoff is excluded.**

(ix) Of much concern therefore it is noted that also ignored in the Wastewater Management section of Appendix F appears to be reference to a range of required design criteria, including but not limited to the following:

Working surfaces

The working surfaces, including the incoming organics, final product, process residuals and contaminated material storage areas, the active composting pad (for windrow composting) and access roads, must:

- *be bunded and graded sufficiently to prevent both run-on and run-off of surface water*

Leachate collection

The leachate collection system must include:

- *conduction of all feedstock storage, active composting and mature compost storage on a specially prepared low-permeability pad.*
- *installation of a drainage layer underneath the processing area to provide adequate leachate drainage from composting organics.*

Leachate storage

The design of the leachate storage system must at least comply with the following requirements:

- *Leachate must be collected and stored in either a dam that is lined or in above-ground storage tanks.*
- *Leachate dams or tanks must have monitoring equipment installed (such as high-level alarms that are interlocked to the discharge pump or line), or the occupier must implement management practices to ensure that they cannot be overfilled.*

Similar to the issue of odour, the legitimate concern of the Council is that if it finds itself in position where there remains sufficient doubt in respect of a suspected risk of adverse impacts on water quality in the locality. The EIS is far from conclusive in this regard appearing to omit critical data analysis and discussion to provide a Determining Authority with any confidence.

It is the Council's position that to date the proponent has not provided sufficient proof that wastewater management on site will be adequately managed wholly within the development site.

Having regard to the above the elected council objects to the development on the basis that the development will have an unreasonable impact on water in the locality.

7 OPERATIONAL ISSUES

There are a range of operational issues addressed in the DEC Guidelines (2004) which either appear to be omitted and/or little referenced with the EIS. This includes, but is not limited to issues related to:

- Minimising discharge of particulate matter.
- Management, storage and disposal of process residuals and contaminated organics.
- Stockpiling of incoming and processed organics.
- Fire Management.
- Closure of the facility.

In respect of the above, the following brief additional comments are offered:

7.1 Dust

The issue of any need to model dust emissions from the site is dismissed with the EIS. Apart from the construction phase which is to be managed via a “*Construction Environmental Management Plan (EMP)*” during the operation phase it is stated that:

“... the requirement that compost be kept moist so that the micro-organisms survive, means that dust omissions during the handling of compost would be minimal.

In practice the impact of dust omissions is minimised by conscientious implementation of a facility dust management plan (DMP) – in some cases supplemented by real time monitoring of dust levels.”

The problem from the elected council's perspective is that the management of particulate matter is in fact far from clear cut. Concerns raised include the following:

- (i) The potential for dust generation is bound up not only with truck movements along narrow farm tracks but also with the management of the organic material on site.
- (ii) From receipt and sorting of material through to movement of material to the Gore Phase 1 pad and subsequent moving of material to Gore phase 2 and phase 3 pads, the movement of material to the maturation area and windrow establishment, screening of material and the eventual dispatch of processed material it is evident that at many stages the development will have the potential for dust emission.
- (iii) For instance while the facility's initial processing might take place within a covered structure, the building will necessarily remain partially open to allow ingress of machines and trucks. The same may be said of the stockpile areas.
- (iv) Truck loads of dry organic material will be dumped onto the concrete for manual inspection and contaminate removal after receipt into the facility. The material is then to be mixed and pushed up into a holding heap and if necessary bulking agents are to be added to the heap. This material is then to be fed into a shredder. Presumably movement of material will include the use of front-end loaders. All these activities occur before water is added to the material.

- (v) Cleanaway in advice dated March 2013, noted that *“on a well run site there is a minimal dust, no litter and limited stockpiling of loose combustible material”*
- (vi) However in the absence of any thorough dust assessment the proponent is simply asking the Determining Authority to accept on face value the assumption that there will be minimal dust from the organic material because of its moisture content and that the handling of materials would not generate significant quantities of dust.
- (vii) On the other hand, and as with odour control, the EIS also notes that stringent management will be required.
- (viii) One of the problems for the Council in assessing the potential for adverse dust impacts is the lack of an overall time and motion study or analysis of the activities across the development site.
- (ix) From the EIS material there is only at best a sketchy description of the numerous movements around the site with trucks, front-end loaders, windrow turning equipment and so on.
- (x) The one thing that is apparent however, is that some of the operations will certainly have the potential to emit dust to the atmosphere.

As the evidence stands, however without more precise information about the activities as they are likely to occur on various parts of the site on a daily basis, and a higher degree of satisfaction on the key issue of good operational management, the Council remains unconvinced that there is not the potential for unreasonable dust impacts as a consequence of the development proceeding.

7.2 Process residuals and contaminated organics

The Council raises a number of concerns in respect of this particularly significant aspect of site operations, namely:

- (i) The EIS states that organics and bulk green waste would be spread on the receival shed floor and manually inspected. Contaminants would be removed and placed in separate bins for recycling or landfilling. Liquid or Commercial and Industrial waste will not be screened as the material will apparently be delivered *“source separated”*.
- (ii) The EIS also specifically acknowledges the responsibility of the operator to securely store all organics, contaminated products, wastes and process residues that cannot be beneficially processed at the facility.
- (iii) This notwithstanding, Council considers that a range of important issues are inadequately addressed in the EIS documentation such as the management of incoming organics including the exclusion of organics:
 - seized or subject to controls issued by AQIS or NSW Agriculture unless otherwise approved.
 - contaminated with chemicals and/or pathogens.
 - contaminated with materials classified as hazardous wastes or industrial wastes.
- (iv) There is also inadequate information in relation to the safe storage and disposal of process residuals and contaminated organics.

- (v) It is also unclear what quality control measures would be in place to ensure that Liquid and C&I waste is in fact uncontaminated.
- (vi) Significantly Council also notes that the composition of compost is not subject to mandatory standards.
- (vii) Industry concerns related to this very issue are alluded to within the Productivity Commission Report on Waste Management ¹³ which included the following finding:

8.1 There may be a case for adopting mandatory minimum standards for compost to address potential risks to human health or the environment, but this would need to be assessed after voluntary industry approaches have been tried and evaluated.

- (viii) In addition the DEC Guidelines (2004) provide that the occupier must comply with the following:
 - *Before dispatching any waste from the premises the occupier must classify or assess waste in accordance with the Waste Guidelines.*
 - *The occupier must ensure that any waste dispatched from the premises is sent to a waste facility that is licensed to receive it or to premises that may otherwise lawfully receive it.*
 - *For wastes classified or assessed as hazardous waste, industrial waste or Group A waste, the facility occupier must comply with the waste-tracking requirements specified in the environment protection licence and/or Protection of the Environment Operations (Waste) Regulation 1996.*
- (ix) From a clear reading of the EIS material there is no certainty provided to explain how any or all of these requirements are to be satisfied.
- (x) The only “comfort” provided by the proponent is a statement by letter dated 22 March 2013 that Cleanaway is committed to producing compost that as a minimum complies with the voluntary AS4454.2012 - Composts, soil conditioners and mulches. [NOTE: This Standard does not cover potting mixes; soils for landscaping and garden use; and playground surfacing.]
- (xi) NSW Department of Environment and Climate Change Guidelines ¹⁴ note importantly that quality assurance is required to ensure composts do not contain weeds, pathogens or contaminants and perform consistently, as well as to develop market confidence in the reliability of composed garden organic products. ¹⁵
- (xii) DECC advise that despite the many benefits of using composted mulches and soil conditioners for catchment management, negative consequences from their use can also occur. This risk is mainly associated with variability in product quality and composition arising from:
 - *Variation in the source and quality of raw materials used to produce the composted product.*

¹³ • Productivity Commission (2006), *Waste Management, Report no. 38*, Canberra [Online] URL

<http://www.pc.gov.au/projects/inquiry/waste/docs/finalreport> [Accessed 5 August 2013]

¹⁴ DECC (2007) Guidelines for Using Compost in Land Rehabilitation and Catchment Management [Online] URL

<http://www.environment.nsw.gov.au/resources/warr/2007527ComplnCatchMan.pdf> [Accessed 5 August 2013]

¹⁵ The WMAA, Compost Australia Division actually advised the Productivity Commission that most compost does not meet the minimum Australian standard. Such compost is typically used in agriculture or viticulture, for example, as a soil conditioner, or in urban applications, for example, as fill for sports grounds. It noted, however, that compost sold at retail outlets typically does meet the Australian standard. (pg 172)

- *Variation in the environmental conditions encountered by the raw material during composting (e.g. temperature, moisture, aeration, period of exposure).*
- *Variation in the ratio of mulches and soil conditioners used to create a blended product.*

- (xiii) Lastly, also unresolved are issues raised by the NSW Department of Primary Industries in respect of weeds and other pest destruction by the composting process and the implications for distribution of composted material. The EIS for instance, only provides a very brief discussion on the issue of Phylloxera, which could be considered to be a particularly relevant issue given that Gerogery is located with a declared “Phylloxera Infected Zone”.

As the evidence stands, without more precise information about the activities and outcomes associated with handling, processing and dispatch of process residuals and contaminated organics, the elected Council has little option but to express its objection in this regard.

7.3 Stockpiling

- (i) The DEC Guidelines (2004) highlight in respect of the stockpiling of processed material that not only should the potential markets be identified at the DA stage but also information should be supplied in relation to the projected quantities of processed organics that each type of market will absorb.
- (ii) The issue of growing stockpiles of composted material has been addressed by the Productivity Commission Report (2006), wherein it was noted that in practice, what appears to be happening is that the supply of compost (of varying quality) has been stimulated by landfill levies and other policies discouraging disposal of waste to landfill.
- (iii) As a result, nearby markets for compost are becoming saturated, and transport costs are ruling out marketing it further afield. This has led to the presence of growing stockpiles of compost across Australia.
- (iv) The EIS apparently provides no contingency in the event that quantities of incoming or stockpiles of processed organics reach design limits.

To date there has been a clear lack of information supplied in sufficient detail by the proponent in respect of market demand for finished product and related stockpiling issues.

7.4 Fire Management

The issue of risk associated with fire within the EIS (Volume 1) is largely focussed on bushfire hazard from surrounding land for the project, with little reference to risk of compost material igniting. The following concerns are therefore raised by Council.

- (i) Contrary to statements within Vol. 1 of the EIS, the Hazard Analysis Report at Appendix K actually discusses a range of internal risk including the risk of spontaneous combustion within stock piled and windrowed material.
- (ii) In addition the EIS also suggests that the risk of internal fires would also potentially include:
 - Glass shards magnifying sunlight;
 - Sparks from Machinery maintenance or operation;
 - Handling of fuels;

- Cigarettes; and
 - Electrical faults.
- (iii) Of these, the DEC Guidelines (2004) highlight that the greatest risks are associated with cigarettes, sparks from welding activities and spontaneous combustion.
- (iv) Curiously however, the subsequent advice received from Cleanaway purports to contend that undue risk from spontaneous combustion is actually considered to be “*an urban legend*”, concluding that such fires are “*considered unlikely to occur in the controlled composting system*”.
- (v) The DEC Guidelines (2004) also provide the following design requirements which have not been clearly enunciated within the EIS namely:

Design requirements

The occupier must prepare a fire management strategy that must identify at least the following:

- *the potential causes of fire at the composting facility*
- *the procedure to follow, persons responsible, and equipment to be used in the event of a fire. This will include on-site resources and external resources (such as the Bush Fire Brigade), and details of how the procedure will operate on a 24-hour-a-day basis.*
- *the maintenance schedules for all fire-fighting equipment and facilities. At a minimum, all equipment and facilities should be visually checked for damage on a weekly basis, and test operated on a quarterly basis.*
- *details of all the fire-fighting equipment that will be installed at the flammable store and at site buildings.*
- *how all fire-fighting equipment will be clearly signposted and how access to it will be ensured at all times*
- *details of the firebreaks to be constructed and maintained around all filled areas, stockpiles of combustibles, gas extraction equipment and site buildings*
- *training of facility staff in fire-fighting techniques.*

The issue of fire management remains an area requiring further analysis and justification. As a consequence the elected Council express its objection in this regard to this important operational issue.

7.5 Closure of the facility

There is no discussion within the EIS in respect of the issue of future closure of the facility and necessary site remediation including ongoing ground water and surface water monitoring.

- (i) It is noted that the contract with the client Councils namely Albury, Wodonga, Indigo and Corowa is for a specified period only. There are certainly no guarantees that the contract and/or site lease would necessarily continue on an ongoing basis.

- (ii) For reference it is noted that such an issue is canvassed in the “*Compost Guideline – public consultation*” report recently released by EPA (South Australia).¹⁶
- (iii) Upon cessation of the composting activity and prior to surrender of a licence, the site should be appropriately decommissioned to prevent an ongoing hazard to the environment, local amenity and/or health and safety of the people.

Clearly this is an issue requiring serious attention should the development proceed. At the very least it is Council’s expectation that contingency planning for site closure would include but not be limited to the licensee:

- removing all buildings, products, feedstocks, waste, bins and other non-permanent infrastructure from the site upon closure; and
- ensuring that the final land surface controls erosion and protects local amenity regarding dust, odour, vectors and litter.

Having regard to the above the elected council objects to the development on the basis that:

- the proposal is deficient in respect of a range of operational issues such as fire management, stockpiling and storage of material and management of dust and noise wholly within the property boundaries.
- there is no proper or adequate consideration of site closure and rehabilitation in the event of future closure of the facility.

¹⁶ EPA SA (2012) Compost guideline - Public consultation [Online] URL: http://www.epa.sa.gov.au/xstd_files/Waste/Public%20consultation/consult_compostguideline.pdf [Accessed 5 August 2013]

8 PUBLIC INTEREST

Submissions to the JRPP Public Briefing meeting raised the issue of public interest and in particular the lack of public interest from the perspective of the people of Gerogery and the broader Greater Hume Shire. **That is, putting it bluntly, the organic waste material has been generated outside of the Shire and therefore should be processed outside of the Shire.**

It is acknowledged by the elected council that there will often be competing facets of public interest that call for consideration as to where the public interest lies, particularly where there are instances of opposing public interests.

Blueprint Planning & Development in their letter dated 6 February correctly notes that the concept of public interest is based on a premise that interests are not confined to one group of people residing in an area over and above the interests of people who may reside elsewhere. Importantly however it should also be understood that Council's objection based on public interest considerations is equally valid in the circumstances.

That is, the issue of considering competing public interests requires that the broader public interest of, in this instance, a large regional community versus the interest of the smaller Gerogery community does not affect the quality or relevance of that smaller interest.

The Land & Environment Court has previously noted that the smallness of the section of public interest should not necessarily affect the quantity or weight of that public interest so that it is outweighed by a broader public interest.

It is the elected council's submission in this instance that the views of the general public who have raised objection to the proposed development needs to be weighed in all the circumstances of the public interest whether or not the evidence and the views therein were put forward by a large or a small section of the public.

In particular concerns raised by the public include but are not limited to the facility:

- being out of context with its rural landscape setting;
- being related to a regional community need of little or no relevance to the local community need;
- having no relationship with or benefit to the local community;
- representing a negative impact on the community without any perceived gains or benefits;
- providing no significant employment or economic opportunities;
- being located on "Kalawa" with no proper assessment of alternative sites within Albury, Wodonga, Corowa or Indigo local government areas.

On balance having regard to all the evidence before the Council, the conclusion drawn is that the proposal is not sufficiently justified as being in the public interest of the community of the Shire of Greater Hume.

Having regard to the above the elected council objects to the development on the basis that the development:

- **is not in the public interest.**
- **will have an unreasonable adverse social impact on the locality.**

9 OTHER ISSUES

Apart from the various issues raised above the Council also highlights a number of additional concerns / objections with the following observations offered to the JRPP in no particular order:

- **The proximity of the Gerogery Township has been significantly downplayed to the point of almost being ignored within the EIS and supporting documentation.**
- In addition to odour buffers, proposed noise buffers also rely on land not in the same ownership;
- The analysis of odour and noise impacts on nearby receptors should also include “Peregrines” as guests are completely unrelated to the development.
- Greenhouse emission calculations are extremely difficult to verify. These calculations exclude petrol used for transport, instead only factoring in diesel consumption. The initial greenhouse analysis also factored in the use of solar generation for electricity supply which is now to be replaced with reticulated electricity.
- **The proposal represents little economic benefit to the local and broader community resulting in only 4 new full time jobs.**
- **The proposal will alienate valuable prime rural land identified as being high – very high agricultural quality.**
- The development will have undue prominence in the open landscape particularly when viewed from public land along Table Top Mountain.
- **The development will be out of character within the context of the surrounding rural locality.**
- The responses of Blueprint Planning and Development to Council officer requests for more information have not comprehensively responded to:
 - The request for an expansion of information on alternative sites
 - No quantity surveyors report has been produced to verify stated capital investment value of \$8.5 million.
 - Health considerations raised by Council are simply dismissed by reference to OH & S operational procedures.
 - There has been no Land Capability Assessment undertaken in respect of any On-site Effluent Disposal system.
 - It is not clear whether a weigh bridge has been incorporated into the design as recommended for facilities receiving over 25,000 tonnes per year.

Having regard to the overall context of this submission including issues related to site selection, amenity impacts (eg odour, traffic, noise, landscape etc), water quality concerns, and various operational issues the elected council objects to the development on the basis that the proposal is contrary to the objects of the Act in that it will not result in an orderly planning outcome.

10 CONCLUDING COMMENTS & RECOMMENDATION

It is a relatively simple exercise to look at the "small picture" associated with one development application and its impact. The Environmental Planning & Assessment Act and Hume LEP however clearly directs a Determining Authority to look the "bigger picture" through the application of relevant decision guidelines, policies and strategies.

Certainly just because a development is permissible with a particular zone should not lead to an assumption that development consent will be necessarily forthcoming.

Firstly the obvious lack of any thorough analysis of alternative locations for siting the development within the regional collection area itself is an issue of key concern to the elected council.

This lack of transparency in the application material simply leads Council to a conclusion that there would appear to be no compelling justification for approval of a facility remote from the entire collection catchment of Albury, Wodonga, Corowa and Indigo local government areas.

This also results in the elected council being of the unanimous opinion that the development is not sufficiently justified as being in the public interest of the community of the Shire of Greater Hume.

As noted within the introductory comments a particularly glaring omission from the EIS and supporting documentation also appears to be a lack of reference to the NSW Department of Environment and Conservation *Environmental Guidelines for Composting and Related Organic Processing Facilities* (2004). Apart from a single reference in Appendix F, the Guidelines appear to have been otherwise overlooked.

This omission provides little confidence from the elected council's perspective that the proposal has been thoroughly considered and that all relevant design criteria have been canvassed leading to a satisfactory level of adherence to industry standards.

For instance the lack of reference to a Water Assessment Plan (Appendix 3) is but one example of such concern.

As also canvassed within this submission a legitimate concern of Council in respect of issues of odour, noise and water quality is that if it finds itself in position where there remains sufficient doubt in respect of a suspected risk of short term and/or ongoing adverse impacts on the locality.

The EIS is certainly far from conclusive in many respects leading Council to a position where there is little confidence in the ability of the development not to cause nuisance and unacceptable inconvenience.

Lastly apart from being satisfied that the facility can operate to best practice environmental standards it is also important that procedures are well established to ensure that all generators and collectors that supply organics to the composting facility seek appropriate advice from the composting operator and end-users. This includes having agreed product specifications and being aware of on-site management practices.

Absolutely no evidence has been supplied to date that would suggest that such reasonable expectations will be adhered to by all generators and collectors on a long term basis.

Further to the above the elected council also notes and supports the conclusions separately reached within the Greater Hume Shire's Planning Officer's Assessment Report that the subject site is unsuitable and which also recommends that Development Application 42-12/13 be refused.

10.1 Recommendation

Having regard to the above it is the stated position of the elected council of the Greater Hume Shire that the Joint Regional Planning Panel, as the Determining Authority, refuse development consent to Development Application 42-12/13 being for a Resource Recovery Compost Operation on land known as "Kalawa" located at 92 Paterson Road, Gerogery for the following reasons:

- (i) the development will have an unreasonable impact on the local road network, particularly as a result of increased traffic generation.
- (ii) the development will have an unreasonable adverse odour impact on residents and occupiers of premises in the locality.
- (iii) the development will have an unreasonable adverse social impact on residents in the locality.
- (iv) the operation of the development will have an unreasonable impact on the existing amenity of residents and occupiers of premises in the locality.
- (v) no proper or adequate analysis of feasible alternative sites for carrying out the development has been provided.
- (vi) the development will have an unreasonable impact on water in the locality.
- (vii) the proposal is deficient in respect of a range of operational issues such as fire management, stockpiling and storage of material and management of noise wholly within the property boundaries.
- (viii) there is no proper or adequate consideration of site closure and rehabilitation in the event of future closure of the facility.
- (ix) the development is not in the public interest.
- (x) the proposal is contrary to the objects of the Act in that it will not result in an orderly planning outcome.

EDM Group
Peter O'Dwyer FPIA CPP
Manager Planning & Environment

On behalf of the elected council of the
Greater Hume Shire

14/08/13
EDM Group Ref: 09014002

APPENDIX 1

Statement of Expertise & Report Declaration

Status report prepared on behalf of Greater Hume Shire Council

The report has been prepared by Peter O'Dwyer FPIA CPP Manager Environment and Planning
EDM Group 99 Hume Street Wodonga.

Professional qualifications

- Bachelor of Arts (Geography) - University of New England, 1979.
- Graduate Diploma in Urban and Regional Planning - University of New England, 1981.
- Graduate Diploma in Environmental Management (Catchment Management) - La Trobe University, 1999.
- Master of Environmental Management & Restoration - Charles Sturt University, 2004.
- Certificate of Qualification (No.668) as Town and Country Planner, Ordinance 4 - NSW Local Government Act.

Professional experience

- 2005 - Partner – EDM Group. Consultant Town Planners, Surveyors & Engineers
- 2004 - 2005 Manager Environment & Development Services – Indigo Shire Council
- 2002 - 2004 Manager IWS Development Services – Indigo Shire Council
- 1995 - 2002 Shire Planner Indigo Shire Council / Manager IWS Planning Services – Indigo Way Services
- 1995 - 1995 Senior Environmental Planning Officer (Town Planner / Specialist) - NSW Dept. Urban Affairs & Planning
- 1991 - 1994 Senior Strategic Planner - Albury City Council
- 1989 - 1991 Senior Planner (2 year secondment) – Albury Wodonga Region Planning Committee
- 1985 - 1989 Strategic Planner - Albury City Council
- 1984 - 1985 Strategic Planner - Randwick Municipal Council
- 1981 - 1983 Strategic Planner - Lake Macquarie City Council

Relevant areas of expertise

- Statutory and strategic planning
- Advice and assessment of land use and development proposals to planning authorities, government agencies, residents and developers.
- Preparation and presentation of submissions before VCAT, NSW Land & Environment Court, Independent Panels and various government appointed panels and advisory committees.

Relevant areas of expertise

- Statutory and strategic planning
- Advice and assessment of land use and development proposals to planning authorities, government agencies, residents and developers.
- Preparation and presentation of submissions before VCAT, NSW Land & Environment Court, Independent Panels and various government appointed panels and advisory committees.

Facts, matters and assumptions relied upon

- Review documents supplied by Greater Hume Shire Council (see Appendix 1)
- Environmental Planning & Assessment Act 1979
- EPA (Vic) & DEC (NSW) Environmental Guidelines

Declaration

I have made all the inquiries that I believe are desirable and appropriate and I declare that no matters of significance, which I regard as relevant, have to my knowledge been withheld from Council or the JRPP within this Assessment Report.

Peter O'Dwyer FPIA CPP
EDM Group

APPENDIX 2

Document List

DOCUMENT LIST

1) Documents supplied by GHSC

- Director-General's Requirements - Department Planning & Infrastructure letter - 2 August 2011
- Environmental Impact Statement Vol 1 - October, 2012.
- Environmental Impact Statement Vol 2 - Appendices, October, 2012.
- NSW Roads & Maritime Services letter dated 21 November 2012.
- NSW DPI letter dated 28 November 2012.
- Greater Hume Shire letter dated 29 November, 2012.
- Greater Hume Shire letter dated 7th December, 2012.
- Blueprint Planning & Development letter dated 6th February, 2013.
- Southern JRPP Public Briefing Meeting Notes - 7th February, 2013.
- Greater Hume Shire letter dated 15th February, 2013.
- Submissions to JRPP Public Briefing Meeting from:
 - Simon Leake
 - Tanja Schramm – Trethowan
 - Terry Corrigan
 - Margaret Pierce
- Blueprint Planning and Development letter dated 26th February, 2013.
- Submission from John McCaffrey Consultant Town Planner on behalf of objectors.
- GHD letter dated 8th March, 2013 and various Appendices.
- Cleanaway letter dated 22 March 2013
- NSW Roads & Maritime Services letter dated 12 April 2013
- NSW EPA letter dated 21 May 2013
- Blueprint Planning and Development letter dated 13 June 2013 and various Appendices
- NSW Department of Primary Industries letter dated 21 June 2013
- ERM Aust report – Gerogery Resource Recovery Centre – Odour Assessment Review July 2013
- Report of Simon Leake Compost Scientist July 2013
- NSW EPA letter dated 12 July 2013
- Greater Hume Shire Planning Officer's Assessment Report to JRPP August 2013

2) Other referenced documents

- DEC (NSW) 2001 *Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW*
- DEC (NSW) 2004 *Environmental Guidelines – Composting and Related Organics Processing Facilities*
- DECC 2007 *Guidelines for Using Compost in Land Rehabilitation and Catchment Management*
- DUAP (1996) *EIS Practice Guideline: Composting and Related Facilities*
- EPA SA (2012) *Compost Guideline - Public consultation*
- EPA Vic (1996) *Environmental guidelines for composting and other organic recycling facilities* (Pub. No. 508)
- EPA Vic (2012) *Separation Distances for Large Composting Facilities* (Pub No. 1495)
- Productivity Commission (2006), *Waste Management, Report no. 38*, Canberra
- WMAA National Technical Committee for Organics Recycling (2004) *Best Practice Series: Composting*

APPENDIX 3

DEC Guidelines (2004) – Water Assessment Plan Requirements

APPENDIX D: ITEMS TO BE INCLUDED IN A WATER ASSESSMENT PLAN FOR A COMPOSTING OR RELATED COMPOSTING FACILITY

Principal component	Subparts
Groundwater and subsoil monitoring network	- documentation describing the background characteristics of the groundwater - unless the preliminary water assessment of the site (Appendix A) has established that the facility poses minimal risk to groundwater, the water assessment plan should include: - a scale drawing showing the location and depth of groundwater monitoring bores - documentation outlining the groundwater hydraulics and the procedures used for bore development and bore security (refer to Section 5)
Discharges to surface water bodies (where relevant)	- a scale drawing of discharges to surface water bodies (including creeks, rivers and dams) - documentation outlining the predicted discharge conditions (e.g. frequency and volume)
Surface water bodies monitoring network	- documentation that describes the background characteristics of the surface water bodies before composting and related organics processing activities start - a scale drawing of monitoring points for all surface water bodies (such as creeks, rivers and dams), which includes: - surveyed monitoring points established upstream and downstream of the facilities - discharges from the premises to surface water bodies - a minimum of one monitoring point per surface water body located downstream from (for flowing or perennial waters) or near (for still waters) the processing area. It is advisable, however, to locate one reference monitoring point per surface water body – upstream (for flowing waters) or distant (for still waters) from the processing area – in order to establish whether any detectable change in water quality has been caused by the processing activities.
Indicator parameters and limits for routine monitoring and assessment of waters	- a list of indicator parameters and limits for routine monitoring and assessment of waters (including groundwater, surface water bodies such as rivers, creeks and dams) and leachate - documentation that gives details of how the parameters were selected and limits for the specific indicators adopted will provide an indication of all the possible types of pollution that may occur. The indicator parameters chosen should be based on the preliminary water assessment of the site (Appendix A) and the types of organics processed at the facility. The following parameters could be used in identifying and assessing waters: - alkalinity, ammonia, calcium, chloride, fluoride, iron, magnesium, manganese, nitrate, organochlorine pesticides, organophosphate pesticides, pH, total phenolics, polycyclic aromatic hydrocarbons, potassium, sodium, sulfate and total organic carbon (TOC). The regular monitoring of electrical conductivity (sometimes written as EC) may be used for preliminary indication of changes in water quality. This is because EC is a measure of the ability of water to conduct an electric current and is sensitive to variations in dissolved solids, mostly mineral salts. Increases in the measured values of EC for waterbodies are often good warnings of changes in the abovementioned indicator parameters.