

Our reference:      FIL12/11671 DOC13/16852  
Contact:              Chris Burton 02 6022 0609

The Manager - North East Victoria  
Transpacific Cleanaway Pty Ltd  
PO Box 879  
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Dear Mr Masters

**Re      Proposed Gerogery Resource Recovery Facility - Air Quality Assessment**

I refer to the meeting between the Environment Protection Authority (EPA) and Transpacific Cleanaway Pty Ltd on 20 May 2013 in relation to the revised air quality assessment (AQA) provided to the EPA on 8 March 2013 for the proposed Gerogery Resource Recovery Facility.

The EPA has reviewed the additional information provided to support the AQA and considers the information provided is not sufficient to allow General Terms of Approval to be drafted for the project.

As discussed during our meeting on 20 May 2013 the EPA's main area of concern with the revised AQA is demonstrating that the SOERs used, particularly for the covered windrows, are representative of proposed operations. There appears to be significant uncertainty around the SOERs used for the covered windrows. The EPA's main areas of concern regarding the SOERs are outlined in Attachment A.

The main challenges for the assessment given the limited data availability are:

- demonstrating that the assessment is appropriately conservative and representative of proposed operation and local conditions; and
- doing this in a way that is transparent, technically correct, and accessible to concerned community members.

Additionally, the proposed emission controls have not been demonstrated to comply with reasonably available technology and good environmental practice. The waste receipt building where waste (including food and liquid organics and grease trap waste) will be tipped, decontaminated (separated), mixed, blended, and shredded, will essentially be open (partially enclosed) and has the potential to be an ongoing and significant odour source. Apart from the use of the Gore® system for covered windrows, little or no other engineering measures have been proposed to eliminate or reduce odour generated at the facility. This may be appropriate if the assessment robustly demonstrates there is a low risk of odour impacts.

We look forward to meeting with you in Sydney on Tuesday 28 May 2013 to discuss the EPA's assessment and information requirements.

If you have any further enquires about this matter please contact Chris Burton by telephoning 02 6022 0609.

Yours sincerely



BRIAN WILD  
Head, Albury Unit  
Environment Protection Authority 21 May 2013

## ATTACHMENT A

The main area of concern with the revised AQA is demonstrating that the SOERs used, particularly for the covered windrows, are representative of proposed operations.

There appears to be significant uncertainty around the SOERs used for the covered windrows. The EPA main areas of concern are outlined below:

**1. The composition of the waste at the proposed facility appears to be approximately 45 percent green waste and 55 percent food and liquid organics and grease/trap waste.**

This composition is derived using the waste composition data presented in the EA (Table 10.1) and assuming that kerbside collected garden organics and food waste was 80 percent green waste and 20 percent food waste (ratio the same as the Camden Trial).

Source	Nature	Annual quantity (t)	%
<b>Kerbside collected organics</b>	<b>Mixed garden organics and food waste</b>	<b>22,500</b>	<b>56.25</b>
<i>Bulk transfer station drop offs</i>	<i>garden waste</i>	<i>4,500</i>	<i>11.25</i>
<i>Commercial</i>	<i>liquid organics including grease trap</i>	<i>5,000</i>	<i>12.5</i>
<i>Industrial</i>	<i>Food waste</i>	<i>8,000</i>	<i>20</i>
	<b>Food and liquid organics</b>	<b>17,500</b>	<b>43.75</b>

Source	Nature	Annual quantity (t)	%
<b>Kerbside collected organics</b>	<b>garden organics - component (80% - estimated)</b>	<b>18,000</b>	<b>45</b>
<i>Kerbside collected organics</i>	<i>food waste - component (20% - estimated)</i>	<i>4,500</i>	<i>11.25</i>
<i>Bulk transfer station drop offs</i>	<i>garden waste</i>	<i>4,500</i>	<i>11.25</i>
<i>Commercial</i>	<i>liquid organics including grease trap</i>	<i>5,000</i>	<i>12.5</i>
<i>Industrial</i>	<i>Food waste</i>	<i>8,000</i>	<i>20</i>
	<b>Food and liquid organics</b>	<b>22,000</b>	<b>55</b>

**2. The SOERs for covered windrows are based on emissions from 80 percent green waste and 20 percent food waste.**

The SOERs used for covered windrows are primarily based on data obtained from a trial undertaken at Camden in 2006. This trial was undertaken using waste consisting of 80 percent kerbside collected garden organics (green waste) and 20 percent supermarket fruit and vegetable organics (EA Section 7.1.2 and URS 2007).

**3. A significantly higher percentage of food waste could lead to significantly higher odour emissions.**

The assessment does not attempt to characterise how SOERs increase with increasing food waste composition. Assuming:

- the Wodonga trial contained 0 percent food waste;
- the Camden trial contained 20 percent food waste; and
- a linear relationship between SOER and food waste composition

the estimated age mean SOER for covered windrows for mixed waste with 45 percent food and

liquid organics waste is calculated to be approximately 10 OU m/s, more than double the estimated age mean SOER for covered windrows used in the assessment.

It should also be noted that for all sources other than the covered windrows and break apart/break apart/turning of windrows the SOERs for all other sources are based on 100 percent green waste.

**4. There is a “paucity of Gore cover composting data under local conditions”.**

It is acknowledged that TCL undertook additional sampling from TCL's Timaru New Zealand operations and a specific trial in Wodonga. However, this sampling was not undertaken on identical or representative waste compositions, and should only be used for comparative purposes.

Additionally, it is usual for elevated ambient temperatures to lead to elevated odour emissions from food waste. On the face of it, it appears unlikely that climatic conditions in Timaru New Zealand are representative of summer in Gerogery.

The main challenges for the assessment given the limited data availability are:

- demonstrating that the assessment is appropriately conservative and representative of proposed operation and local conditions; and
- doing this in a way that is transparent, technically correct, and accessible to concerned community members.