



Your ref: SP24025
Our ref: DOC25/797116

Ms Emily Hewitt
Consultant
Habitat Planning Pty Ltd
16 Fitzmaurice Street
WAGGA WAGGA NSW 2650

By email only: emily@habitatplanning.com.au

Dear Ms Hewitt

Thank you for consulting with the NSW Environment Protection Authority (**EPA**) on the proposed Integrated Development Modification (**IDA mod**) application for the Tumblong non-putrescible waste disposal facility operated by MH Earthmoving Pty Ltd (**proponent**) at Tumblong Reserve Road, Tumblong (**premises**). We note that the proponent holds Environment Protection Licence No. 21440 (**licence**) for waste disposal (application to land) activities carried out at the premises.

Based on the information provided in your email to us dated 12 September 2025, we understand that the IDA mod proposal consists of increasing the annual limit for the quantity of waste disposed at the premises from 60,000 tonnes to 99,000 tonnes.

As discussed in the pre-lodgement meeting between the EPA and Habitat Planning Pty Ltd on 9 May 2025, the EPA have ongoing concerns regarding odour and leachate management at the premises. Further, we note that since the commencement of operations at the premises, the EPA has received a significant number of complaints in relation to alleged offsite odour impacts.

To ensure any outstanding concerns have been adequately addressed as part of the proposal, we have taken this opportunity to complete a preliminary review of the documents you provided to us on 12 September 2025 and included comments at **Attachment A** for your consideration prior to finalising the application for lodgement with the relevant consent authority.

If you have any further questions about this matter, please contact James Mills on 0438 706 396 or at info@epa.nsw.gov.au (Cc: james.mills@epa.nsw.gov.au).

Kind regards

NICK VAN LIJF
Unit Head - Operations
NSW Environment Protection Authority

25 September 2025

cc: martin@mhew.com.au

Attachment A

Modification Report – 12 September 2025:

1. Chapter 1.3 of the modification report mentions that the modification report was prepared in accordance with the Leachate Management Plan (**LMP**) dated 3 July 2025 and Landfill Gas Management Plan (**LFGMP**) dated 14 August 2025.
 - a. We note that the LMP and LFGMP were both prepared based on the current waste disposal limit of 60,000 tonnes per year, rather than the proposed 99,000 tonnes per year. As discussed further below, we recommend that both of these documents are reviewed and appropriately revised prior to submission.
 - b. We note that during the pre-lodgement meeting, that the EPA have ongoing concerns regarding leachate and landfill gas management at the premises. Should the proposal be lodged, we recommend that these concerns be adequately addressed in the submission.
2. Chapter 4.2.11 of the modification report discusses NSW state environmental planning policies (**SEPPs**). Notably, it is stated that *“The site has been the subject of environmental conditions and monitoring in accordance with the current EPL 21440. Measures for managing and mitigating risk at the landfill are outlined in the existing management plans including the recent submission of a Landfill Gas Management Plan (LGMP) and Leachate Management Plan (LMP) to the EPA. It is considered that the proposal is not an offensive industry due to the ability to comply with the licence requirements and appropriate management plans.”*
 - a. We note that the EPA hold ongoing concerns regarding potentially offensive odours and leachate management at the premises. We also note that the EPA has placed several Pollution Reduction Programs (**PRPs**) onto the licence aimed at addressing these concerns, including most recently, two PRPs, for the preparation and submission of the LMP and LFGMP. We note that these management plans have been received by the EPA however, there may be actions outstanding following recommendations outlined in these management plans.

As discussed above, these management plans have been prepared relative to the current limit of 60,000 tonnes of waste disposed at the premises per year, rather than the 99,000 tonnes of waste disposed at the premises per year proposed in this DA Mod. We note that the increased frequency of waste emplacement may lead to an increase in landfill gas generation rates. While the potential for the overall volume of landfill gas generated may not be significantly impacted, the rate of generation and its potential to create and emit potentially offensive odours is of great concern to the EPA.
 - b. In addition, we note that the licensee was issued a penalty notice on 30 November 2021 following a contravention of a condition of the licence.
 - c. We recommend that these matters be carefully reviewed prior to submission. Please note, failure to adequately address these matters may result in the EPA determining to reject the proposal.

Air Quality Impact Assessment (AQIA) – 31 July 2025

3. Chapter 3.1 of the AQIA states that *“It is noted that the Project does not include any activities defined as a scheduled activity under the Protection of the Environment Operations Act 1997 (POEO Act), although the general principals of air pollution minimisation also apply to non-scheduled activities.”*
 - a. We note that the proposal relates to “waste disposal (application to land)”, at quantities above the threshold limits listed under Schedule 1 of the POEO Act.
 - b. We recommend that this statement is revised.
4. Weather monitoring data:

- a. Chapter 4.3 of the AQIA states that *"Data from Wagga Wagga AMO AWS (Wagga AWS) [Automatic Weather Station] for the period between 2020 and 2024 have been analysed for use in this study. It is noted that there is no publicly available data between 2020 to 2024 at Gundagai (Nangus Road) AWS and, correspondingly, this AWS was not analysed."*
- b. Chapter 4.6 of the AQIA states that *"Given the separation distance between the AQMS [Air Quality Monitoring Station] and the Project site (approximately 56.3 km), that data may not adequately include the impacts of sources of air pollutants which are in closer proximity to the Project site."*
 - i. While chapter 4.6 also states that a *"desktop review identified no facilities proximate to the Project site that may result in cumulative impacts"*, it does somewhat emphasise the importance of having an on-site weather monitoring station.
- c. As discussed during the pre-lodgement meeting, the EPA currently hold concerns regarding landfill gas management at the premises and as such recommend that on-site meteorological data be used for any meteorological assessments regarding this proposal.
- d. We understand that there is currently no on-site meteorological data available and recommend that a suitable weather station be installed at the premises to improve the relevance and confidence of the data presented. This is discussed further below under the heading *"General comments/recommendations"*.

5. Odour:

- a. Chapter 2.3.3.2 of the AQIA discusses the temporary leachate dam.
 - i. Notably, it is stated that *"Given that the leachate stored above the floating cover is chemically treated and mechanically aerated prior to pumping to Leachate Dam 2, the leachate should not pose a significant odour risk unless (a) the treatment in Leachate Dam 1 is insufficient to deal with the leachate loading rates, or (b) the leachate stored becomes stagnant / anoxic, or (c) the precipitated solids are allowed to build up which may cause an anaerobic layer which may become an odour source if disturbed."*
 - ii. We note that chemical treatment, by hydrogen peroxide (H_2O_2) dosing, and mechanical treatment are discussed further to address items (a) and (b) in the paragraph above, however, we recommend that the potential build-up of precipitated solids be addressed when lodging this proposal.
- b. Odour estimations:
 - i. Chapter 5.2.2 of the AQIA refers to the apparent over-estimation of predicted odour impacts as the assessment considers data from putrescible landfills. We understand that the odour impacts caused by sulphurous compounds, particularly hydrogen sulphide (H_2S), known to have been produced at the premises have the potential to travel vast distances and cause discomfort at relatively low concentrations. We note that these sulphurous compounds are often not associated with putrescible waste or putrescible landfills and as such, recommend that sulphurous compounds are considered in the odour assessment.
 - ii. We note that, while the premises does not accept putrescible waste, it has been known to produce H_2S . As briefly mentioned above, H_2S is known to be particularly offensive at relatively low concentrations and as such, the assumptions based on putrescible landfill odours may not be as conservative as the AQIA indicates.
 - iii. Similarly, chapter 5.2.2.1 seeks to address odour concerns regarding odour resulting from storage of leachate associated with putrescible waste.

- iv. As such, we recommend that the relevant odour emission rates at the premises be appropriately and sufficiently measured and calculated for inclusion in the proposal.
- c. Odour emission controls:
- i. Chapter 5.3.2 of the AQIA discusses the efficiency of odour control at the premises by the use of H₂O₂ dosing, paired with mechanical aeration.
 - ii. It is stated that “*H₂O₂ dosing at the Project Site is less efficient than scrubbing and will not achieve that control efficiency [98%] alone.*”
 - iii. Further, it is stated that “*In the absence of site-specific data, H₂O₂ dosing and mechanical aeration is assumed to achieve 98% odour control efficiency which is considered to be reasonable.*”
 - iv. We note that odour emission controls in the form of a combination of H₂O₂ dosing and mechanical aeration are currently utilised at the premises and recommend that site-specific data regarding this odour emission control efficiency be collected, calculated and reviewed for inclusion of the lodgement of this proposal.
6. Recommendations from the AQIA:
- a. Chapter 7.2.1 of the AQIA discusses recommended controls to be implemented at the premises, notably, the recommendation to implement an Air Quality Management Plan (**AQMP**) for the premises. As such, we recommend that details surrounding the implementation of an AQMP be included in the submission.
 - b. Chapter 7.2.2 of the AQIA discusses recommended monitoring to be implemented at the premises, notably, the recommendation for the operator to perform “*daily, ad hoc air quality and odour observational monitoring.*” As discussed above under the heading “*Weather monitoring data*”, we recommend that a suitable weather station be installed at the premises to enable reliable and accurate air quality, odour, and meteorological observational monitoring.
7. Appendix D of the AQIA assesses the emission factors of the proposal.
- a. For paved roads, listed in Appendix D, bases the mean vehicle weight on the average weight of the truck fleet of 30 tonnes. We note further that throughout the modification report, “typical load” is listed as 40 tonnes, not accounting for the tare mass of the vehicle and trailer combinations.
 - b. We recommend that the average weight of the truck fleet be reviewed and that adequate justification for the calculation of the average weight of the truck fleet be provided when lodging the proposal.

Noise & Vibration Impact Assessment (NVIA) – 1 July 2025

8. The EPA have no specific comments or recommendations regarding the NVIA.

Traffic Impact Assessment (TIA) – 6 June 2025

9. The EPA have no specific recommendations regarding the TIA.
- a. We do note however that there are several statements within the TIA which may be inconsistent with other statements within the same document and between the TIA and other documents provided. We recommend that the reliability of the TIA is reviewed prior to the submission of the proposal.

Landfill Gas Management Plan (LFGMP) – 14 August 2025

10. The LFGMP was prepared and submitted to the EPA on behalf of the proponent as a requirement of a PRP, which was placed on the licence following EPA concerns regarding potentially dangerous and/or offensive landfill gas emissions from the premises.

- a. We note that the LFGMP was prepared respective of the current waste disposal limit of 60,000 tonnes per year, rather than the proposed 99,000 tonnes per year.
- b. We recommend that the recommendations provided in the LFGMP be implemented at the premises prior to the lodgement of the proposal.
- c. We recommend that the LFGMP be appropriately revised prior to lodgement of the proposal.

Leachate Management Plan (LMP) – 3 July 2025

11. The LMP was prepared and submitted to the EPA on behalf of the proponent as a requirement of a PRP, which was placed on the licence following EPA concerns regarding the leachate management and the limited capacity of leachate at the premises.
- a. We note that the LMP was prepared respective of the current waste disposal limit of 60,000 tonnes per year, rather than the proposed 99,000 tonnes per year.
 - b. We recommend that the recommendations provided in the LFGMP be implemented at the premises prior to the lodgement of the proposal.
 - c. We recommend that the LMP be appropriately revised prior to lodgement of the proposal.

General comments/recommendations

12. As discussed above, we note that weather data used for the modification report, AQIA, LFGMP and LMP has been based on weather station data from distant locations with dissimilar topography and weather patterns to the premises.
- a. We recommend that a weather station, meeting the requirements of AS/NZS 3580.14 be installed at the premises and that the relevant data collected by this weather station (sited and operated in accordance with AS/NZS 3580.14 and AS/NZS 3580.1.1) be used for the assessments required by the proposal.