

Subject: FW: P16-215 - Proposed covered anaerobic lagoon - 22 Tannery Rd Longford

From: Blackwell, Damien M (Environment) [<mailto:Damien.Blackwell@environment.tas.gov.au>]

Sent: Wednesday, 18 January 2017 11:37 AM

To: Paul Godier <paul.godier@nmc.tas.gov.au>

Subject: P16-215 - Proposed covered anaerobic lagoon - 22 Tannery Rd Longford

Hello Paul

Since EPA Tasmania provided advice to Council 23 September 2016 concerning the ancillary nature of the above proposal, it has received several reports relating to the proposal's potential environmental impacts, namely:

- JBS Longford wastewater treatment plant – *Environmental Management Plan* 17 November 2016 (Pitt&Sherry)
- JBS Longford plant – Wastewater treatment facility – *Technical assessment report* 5 December 2016 (Environmental Service & Design Pty Ltd)
- JBS Longford plant – Wastewater treatment facility – *Additional technical assessment report* 12 December 2016 (Environmental Service & Design Pty Ltd)

I understand Council will draw on the information in these reports to assist its decision making with respect to the proposed use. EPA Tasmania has also reviewed the information contained in these reports and as requested offers the following advice which Council may, in its assessment and conditioning of the proposed use, wish to consider.

Covered anaerobic lagoon (CAL) – Capacity

Greater clarity about whether the CAL design accounts for anticipated increases to livestock processed at the abattoir appears necessary. Increases in throughput may be associated with corresponding increases in wastewater flows or loads and therefore greater demands on the CAL.

Air emission dispersion modelling and air quality (odour) monitoring

EPA Tasmania does not routinely require a proponent to conduct air emission dispersion modelling where gas flaring is involved. However, it would be appropriate to check and confirm, by measurement if necessary, that complete combustion of biogas by the flare occurs during typical operations. In addition, EPA Tasmania supports a regular inspection and maintenance regime concerning the gas capture and treatment system.

While there is limited justification to request odour modelling, fugitive odour may be associated with de-sludging events and plant upset conditions, and from the pump pit which delivers treated wastewater to the TasWater wastewater treatment plant. On this basis, it would be appropriate to check and confirm, by measurement if necessary, that odour is unlikely to cause environmental nuisance at the nearest sensitive receptor. Odour monitoring results for a CAL located at JBS Australia Pty Ltd's Queensland processing plant, referred to in the Pitt&Sherry report, would help inform this appraisal.

Surface water

Figure 2 and Section 6.2.4 of the Pitt&Sherry report indicate stormwater runoff will be directed away from the CAL and primarily to Back Creek. Routine monitoring of these flows does not seem necessary.

Groundwater

1 – 205 B.

For a proposal where impacts to groundwater are possible, such as during the construction and operation of a CAL, monitoring of groundwater quality and flows is expected. Consequently a condition to require the applicant to install at least one groundwater bore and regularly monitor groundwater conditions would be appropriate.

Noise

While operational noise is unlikely to cause environmental nuisance at the nearest sensitive receptor, a condition to require the applicant to record and act on complaints would be appropriate. Noise associated with construction activities should be handled in accordance with an approved Construction Environmental Management Plan (refer below).

Waste (sludge) management

More specific details about how often the proposed CAL is likely to be de-sludged, the potential for odour nuisance during de-sludging and what precisely is meant by 'beneficial reuse' of sludge appears necessary, particularly if the intent is to dewater the sludge on the development area.

Potential environmental impacts during construction

A condition to require the applicant to provide and act in accordance with a Construction Environmental Management Plan (CEMP) would be appropriate. The CEMP should detail how the applicant intends to manage issues including noise, dust, erosion and sediment loss and weeds and diseases during the construction stage to minimise the potential for environmental nuisance.

Disrupted or plant upset conditions

An evaluation of how disruptions, such as electricity outages, variable flows and poor biological activity, may affect the operation of the proposed CAL is considered appropriate. The likelihood and consequences of process disruptions, and their management, should be discussed by the applicant.

Treated wastewater – Monitoring and targets

The applicant's commitment to provide equipment to monitor the flow and quality of treated effluent (post the CAL) is supported. A condition to require this arrangement may be appropriate. The nature and magnitude of the water quality targets or limits are anticipated to be negotiated and set between the applicant and TasWater.

If you have any queries regarding the above, then please feel free to call/ email me to discuss.

Regards

Damien

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