



THE ODOUR
UNIT

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by email: mbartley@hwle.com.au

GREENHAM TONGALA - ODOUR IMPACT ASSESSMENT RESPONSE TO PUBLIC COMMENT

Dear Mark,

We have prepared this letter in response to feedback from EPA that they received one submission during the community consultation process, expressing concern about possible adverse odour impacts from the proposed rendering plant development at the Greenham Tongala. We have restricted our response to technical matters, in the form of clarification of points made in the Odour Impact Assessment Study report issued in March 2019. Each of the two main concerns expressed by the resident are addressed separately.

Concern: "Our concern is that the last time Greenham did rendering at this site the stench at times was very bad"

Response: The previous rendering plant was commissioned in 1994 and utilised a simple low-temperature rendering process where raw material was heat stabilised, separated into aqueous, tallow and meal fractions and the meal dried in a hot air dryer. Blood was also processed in a blood dryer which vented direct to atmosphere. We understand that there was no odour control until 1998 when a small, rudimentary biofilter was installed to treat the odorous dryer emissions. It is TOU's judgement that the biofilter would have been undersized and unable to fully remove odours from the dryer airstream. In addition, uncontained fugitive odour emissions from the rendering building would most likely have occurred at certain times. Such an odour control system would not be seriously considered today and would certainly not meet current regulatory standards for odour mitigation and management.

The proposed new rendering plant will utilise a different, high-temperature process where all significant processing units will be connected to the odour capture system which will direct process air to a modern biofilter system specifically designed for the airflow. The biofilter will be capable of achieving full rendering process odour destruction. Capture efficiencies greater than 90% are expected, with residual air being vented to atmosphere through vertical roof fans, designed for rapid dispersion. This odour control system represents best practice for high-temperature rendering plants in this type of location. It has a proven track record for sustainable good performance.

Concern: "I believe we have a pre-existing right to our quality of life and have a right to object to this plan going ahead due to the smell and damage to air quality in this area"

Response:

The odour impact assessment included a predictive odour dispersion modelling study which used real-world odour emission data from similar rendering plants, overlaid onto the Tongala site and surroundings and found general compliance with EPA's ground level odour concentration criteria, at the nearest residential receptors. This finding, when taken with the

proposed use of best-practice odour controls and management, strongly indicates that adverse odour impacts at the nearest receptors are unlikely to occur. On this basis impacts within the township of Tongala, being further distant, are extremely unlikely to occur.

I trust that the above information is able provide assurance to concerned residents that the proposed modern, well-designed rendering plant and odour control system are vastly improved from that in operation in the 1990s. In addition, management systems have been developed that should ensure that the system is maintained and operated in a manner that will maximise and sustain good odour removal performance in the future.

I fully understand why this Tongala resident may feel concerned about odour issues associated with the proposed new rendering plant, particularly given the accepted view that the previous plant in the 1990s did cause odour problems. I would be pleased to discuss their concerns personally with them, if the need arises.

Yours sincerely,
The Odour Unit Pty Ltd



Terry Schulz B. Eng (Chem.), CAQP
Managing Director