

30 August 2018

Katherine Smith  
Senior Strategic Planner  
Victorian Planning Authority  
35 Collins Street  
MELBOURNE VIC 3000

EPA Reference: 5007900

Dear Ms Smith,

**RE: Review of GHD and PEC reports for C232 Officer Precinct Structure Plan Town Centre**

Thank you for your correspondence seeking EPA to review the GHD Officer PSP Buffer Assessment Report report dated 31 July 2018 (including an updated GHD report received by EPA on 21 August 2018) and PEC draft review of GHD report dated 19 July 2018 relating to the Officer PSP Buffer Assessment.

EPA has reviewed both the updated GHD (August 2018) reports and the PEC review of the GHD report and provides the following comments:

- There is a general agreement with the orientation of the 250 buffer for the HyGain facility. The "derated" buffer is based on a fairly limited site of meteorological data from the EPA Pakenham Air Monitoring Station (that is no longer operating) that is approximately 10 years old and only covers 12 months (it is uncertain over which year was covered as the site operated from 2002 to 2008). An assessment using at least 5 years of more current data is recommended before "derating" the default buffer of 250 metres.
- EPA understands that the main impacts from the facility would be dust created from grain milling and conveying activities on site and possible odour from the grain processing on-site (EPA understands there is limited cleaning and flaking of grains using steam which would generate odour).
- The original and updated GHD reports state that odour was observed at the perimeter of the site, given the sources of the odour EPA would anticipate that presence of this odour would be unlikely to extend further than the 250 metres buffer, however the statement that the odour "was not deemed offensive" is not correct.
- In making odour assessment we'd suggest exercising caution in making subjective judgements. EPA agrees that odours from this sort of process could be considered pleasant by most people (i.e.



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bread, porridge or gain type odours can be expected), however EPA has had experience where repeated discharge of these type of odours has given rise to complaints, and therefore it is presumptuous to "deem" an odour offensive based on 1 perimeter survey.

- Dust impacts from the site are likely to be from upset conditions only (the HyGain site is largely sealed) and only a failure in pollution control equipment (bag-houses and cyclones) would likely give rise to dust impacts.
- EPA agrees with the PEC review in that these discharges would only have an amenity impact as we would anticipate particles would not typically be toxic, small enough or in great enough concentration to cause an exceedance of policy levels and there would be relatively minor issues regarding damage to property on the (rare) occasion of plant upset. The 250 metres buffer protects sensitive uses from upset dust events and represents the extent of which off-site odour would be expected to be encountered.
- In summary, EPA advises against high order sensitive uses within the 250 metre buffer (such as residential uses), but advises that other sensitive uses could be considered on a case by case basis (i.e. informal outdoor recreation) as the likelihood that sensitive uses are impacted in these cases are lower compared to residential uses where the likelihood of exposure to odour and dust would be higher.

EPA recommends that further assessment is undertaken as follows:

- A noise assessment on a case by case basis;
- An assessment using a minimum of 5 years of more current data to assist the EPA to determine the suitability of a reduced buffer and whether a "derating" of the 250 metre buffer is appropriate.

If further information is required in relation to the above, please contact our Strategic Planning Officer, Rund Gorgis on 1300 EPA VIC (1300 372 842).

Yours sincerely



Marleen Mathias  
Manager  
Southern Metro  
**EPA Victoria**