



3 April 2024

To Huntly residents,

Western Composting Technology (WCT) wishes to address concerns regarding the proposed Huntly composting facility that were expressed in submissions to the Environment Protection Authority (EPA) and the City of Greater Bendigo (Council). We take these concerns seriously and hope that the following information is helpful.

WCT has successfully operated a similar facility for over 16 years at Shepparton. We have a proven track record of protecting local amenity, avoiding environmental impact, and adopting the best available techniques and technologies.

Our applications to Council and the EPA provide evidence the proposed Huntly operations will result in low environmental and public health risks. Offsite impacts on air quality, odour, dust, noise, surface water, land and groundwater can be effectively managed.

The proposal is to create compost from organic waste. The proposal is not for a landfill. Any rubbish contaminating the organics we receive will be separated and sent to an existing landfill.

### Site selection

- The City of Greater Bendigo selected the proposed site following a visit to assess the operations at WCT Shepparton.
- The location meets the EPA Separation Guideline for industries such as composting facilities<sup>1</sup>, which aims to protect residents from dust and odour.
- The location is appropriately zoned as Industrial 1.
- The site is located outside the flood plain.

### Management of Odour

- WCT engaged technical odour consultants GHD to assess the risk of odour from the proposed Huntly site, using EPA approved odour assessment methods.
- The assessment considered the activities at WCT Shepparton and the potential extent and intensity of odour from the Huntly site. It was confirmed that there is a low risk of odour impacting neighbours. The EPA are reviewing this assessment.
- Odour produced during composting will be managed on-site using best-practice technology and techniques. The FOGO (‘food organic & garden organic material’) will be composted in a European designed, airtight tunnel.

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<sup>1</sup> EPA Publication 1518, available at <https://www.epa.vic.gov.au/about-epa/publications/1518>

This technology does not allow untreated odour or other air emissions to escape into the environment.

- The proposed tunnel design is regularly used in European countries to compost FOGO within 200 to 300 m of houses.
- A biofilter, a technology commonly used for effective odour removal, will capture and treat the air emissions from the tunnels.
- This technology is the same used at WCT Shepparton, which has never breached EPA odour requirements.

### **Traffic**

- One Mile Grid completed a Traffic Impact Assessment. It assessed existing traffic along Wallenjoe Road and Leans Road and at the intersection of Leans Road and the Midland Highway, including during peak hours.
- The assessment concluded that traffic from the proposal is expected to have minimal impact on intersections, causing little to no changes in traffic queues and delays.
- Traffic volumes will remain well within the capacity of Midland Highway and Leans Road and changes will be barely noticeable to motorists. Very little additional traffic will use Howard Street and south of Wallenjoe Road.

### **Flood and Drainage**

- The site is outside of the mapped 1 in 100-year flood area.
- A 1.2m high earthen-bund wall around the perimeter will prevent stormwater from entering or exiting the site. On-site rainfall will be captured in tanks (e.g. roof rainwater) or diverted into the site dam.
- The dam will be built to contain a 1 in 20-year rainfall event with additional capacity as a buffer. Dam water will be reused in the composting process.

### **Waterways, groundwater and surrounding land**

- As above, stormwater will be captured in the site dam as per standard practice at the WCT Shepparton site.
- Groundwater will be protected by concrete (e.g. receival shed and tunnel floors) and impermeable clay surfaces (for maturation windrows and the site dam). Clay liners will be engineered and tested to achieve EPA requirements.
- Windblown litter will be contained on-site by a 2.7m high chain-wire mesh fence with geo-fabric, which will surround the site. Staff will regularly remove litter from the site.
- Rubbish will be stored in a fully enclosed compactor and removed weekly to a licenced landfill facility.

### **Dust**

- A range of controls will manage dust so that it will not affect neighbours. For example, sprinklers and hoses will dampen windrows, windrow turning and other potentially dusty operations.

- Regular monitoring and management will occur to avoid dust generation during windy conditions.

### **Managing Biosecurity Risks**

- Biosecurity risks, including risks to the Bendigo Livestock Exchange, are mainly associated with bioaerosols (fine particles suspended in air that include living biological material).
- Risks will be minimised by pasteurising all material within fully enclosed and sealed pasteurisation tunnels. The tunnels will generate temperatures that kill pathogenic microorganisms and sterilise weeds and seeds
- Temperatures will be monitored and recorded to confirm sufficient temperatures and ensure pasteurisation conditions are met.

### **Animal and Human Health**

- Pasteurisation kills pathogenic microorganisms within the material. This addresses risks to human and animal health.
- Vermin and birds will be managed by receiving all material in the receival shed and moving it into enclosed tunnels on the same day.
- The end product (compost) will be verified against strict EPA criteria and Australian Standards. Regular testing will confirm acceptable pathogen and contamination levels.
- WCT will manage the site to avoid cross-contamination of its on-site material. Dust and runoff will be carefully controlled to prevent contaminating the matured compost or final products.
- The site will not take liquid wastes like grease trap waste etc

### **Noise**

- Noise from the proposal was assessed by taking noise measurements at WCT Shepparton and using these in computer modelling. This confirmed that our nearest neighbours will not hear our operations, even during worst-case wind directions and when all plant is operating.

### **Fire**

- The fire risk assessment concluded a low risk of fire. It demonstrated that a fire in a composting windrow would not generate enough radiant heat to propagate to an adjacent windrow.
- Fires from other sources on-site (e.g. within the concrete tunnels) are very unlikely. The tunnels will be airtight, made of concrete and separated from each other. This will minimise the risk of fire spreading between tunnels.
- The site will have best practice and CFA-endorsed fire prevention response equipment and procedures in place.

### **Protection of flora and fauna**

- There will be no on-site impacts on flora and fauna. No tree removal is required for the project.

- Wildlife, including frogs, snakes and lizards will be excluded from the site by a full perimeter chain-link fence covered with geo-fabric.
- The site activities will be contained and there will be no offsite risks to flora and fauna from poor water quality, dust or bioaerosols.

### **Decontamination**

- WCT relies on a decontamination process that results in a compost product that meets EPA requirements, Australian Standards and the high expectations of our customers.
- WCT will immediately decontaminate material entering the site (removing plastic, metal, and any other hard rubbish within the FOGO).
- If an incoming load is too contaminated, WCT will reject it and remove it from the site to a landfill.
- We are aware of the recent asbestos contamination of some mulch products in NSW. Whilst asbestos may be an unlikely contaminant of FOGO waste, our decontamination and testing process will manage risks relating to potential contaminants, including asbestos.