

DPEMP SUPPLEMENT – submitted 18 April 2014 – proponent responses in red text

Huon Aquaculture Company – Fish Waste Composting Facility, near Police Point

Summary of public representations and agency comments

In the following tables, 'DPEMP' means the Development Proposal and Environmental Management Plan, Huon Aquaculture Company P/L, Police Point, Fish Waste Composting Facility, August 2013, by S Cruickshank, as submitted with Development Application to Huon Valley Council 27 September 2013.

A. Public representation details

Issue	Comment	Further information required by EPA
Trucks entering and leaving via Barrys Road	<p>Concerns regarding noise, dust and potential smells as trucks drive by property which runs alongside Barrys Road. Would prefer if other two access roads were used rather than Barrys Road. Seeking assurance that Barrys Road will not be used as an access road to the facility.</p> <p><i>As stated in the DPEMP there will only be a low level of traffic movement to and from the site. With those on Barry's Rd being a ute carrying one sealed bin at maximum once daily in winter (Mon- Fri) and the same vehicle with a trailer at maximum twice daily in the peak summer period (Mon-Sat). Less frequent delivery of high carbon inputs by an 8-20 yard truck and trailer (4-5 trips per week maximum in the summer and 2-3 trips maximum in the winter) including the removal of finished product may involve more vehicle movements on a particular day. At this stage it is envisaged that the Glendevie road will be the main access point for heavy vehicle movements, as it is a shorter trip to the site. However on days when access may be difficult from Glendevie Rd, (wet days for instance) then access will be by Barry's Rd. If this were the case return trips would only amount to a maximum of 6 per day (e.g., including random visits) and all normal operations/deliveries will be made during</i></p>	<p>It is understood from the DPEMP that Barrys Road (Access route #1 from Appendix 1 of the DPEMP) will be used for transporting morts from Hideaway Bay to the compost facility, and that wood inputs are likely to come via Access route #2. Provide comment on how potential noise, dust and odour issues associated with transportation of morts can be managed and minimised while travelling via Barrys Road (Access route #1) and other access routes when near residences, whether alternating use of different access routes is a possibility, and consider and discuss options for maintaining open lines of communication with residents/property owners along transport route(s) so that any issues that do arise can be quickly resolved.</p>

	<p><i>daylight working hours.</i></p> <ul style="list-style-type: none"><i>• Given that the bins will be sealed and washed after each delivery and that the contents will be fish morts held in cool storage prior to moving it is not perceived that there will be any odour issues during transportation of morts.</i><i>• Huon Aquaculture plans to survey local residents RE: odour and noise concerns as an on going commitment to social cohesion and duty of care. In house odour audits will be carried out on a regular basis over the life of the facility.</i>	
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A. Referral agency and specialist comments

DPEMP section / page	Comment	Further information required by EPA
Section 2.2.1 and elsewhere	<p>A permit for the 1.8 ML secondary leachate dam under the <i>Water Management Act 1999</i> may be required under Part 8A of that Act.</p> <ul style="list-style-type: none"> <i>Huon Aquaculture will fulfil all regulatory requirements with regard to infrastructure implementation and construction.</i> 	<p><i>For proponent's information only.</i></p> <p>Council is required to refer the proposal to the Assessment Committee for Dam Construction under section 165F of the <i>Water Management Act 1999</i>; however proponents of dams may also initiate the process themselves.</p>
Page 27, Section 2.2.4 – Production capacity	<p>Quantities of fish morts and wood waste are inconsistent in text, in the table on p27 and table on p28 and it is difficult to follow discussion when it switches between tonnes and cubic metres. Eg. page 27 discusses 1,100 tonnes or 1,095 tonnes of fish (wet weight), but the table on p28, when added up, comes to approximately 640 cubic metres of morts. If it assumed that fish morts have a bulk density of 1 tonne per cubic metre, then the amounts are substantially different.</p> <p>Previous discussions between the proponent and assessment officer (emails, 28/05/2013) concluded that the limit for the permit would be 2,400 tonnes per annum of compost produced, however this is not reflected in the DPEMP. The DPEMP discusses an estimated volume of 1,500 cubic metres of finished compost per annum, which when using a generally accepted bulk density of finished compost of 600 kg/cubic metre, results in a finished product weight of approximately 900 tonnes per annum.</p> <ul style="list-style-type: none"> <i>The irregularity between the two tables has occurred as the second table reflects data collected by the company on a month by month basis (showing seasonal fluctuations in mort numbers), whereas the figure of 1095 tonnes p/a stated in the first table is allowing for a worst case scenario of 3m3 per/day. It probably should have been noted in the original text that the consultants biggest concern is an undersized facility being built and leading to issues for proper processing and potentially negative outcomes for product</i> 	<p>Clarify quantities of inputs (fish morts and wood waste) and confirm expected maximum quantity of finished compost product to be produced (in tonnes per annum). Ensure consistency between quantities and units throughout the document and between DPEMP and odour impact study (Appendix 12).</p> <p>There may be implications for the odour modelling exercise should quantities change substantially and this should be factored in to any decisions made based on the final quantities to be produced at the site.</p>

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	<p><i>quality and odour control. Hence the scaled up daily average that has a built in safety factor.</i></p> <ul style="list-style-type: none"> <i>The second part of this comment regarding confusion around weight conversion to volume has come from a mistake on the part of the author of the report! The actual annual tonnage should have been calculated by adding the amounts in the table on pg.27 and then allowing for a shrinkage factor of .75 due to microbial degradation etc. The actual figure is approximately 2,620 tonnes per annum. To get the volume amount this figure should then have been divided (not multiplied) by the bulk density of finished compost of .6 t/m³ giving a figure of approximately 4,370 m³ p/a.</i> 	
Page 47-48	<p>Maceration of fish morts prior to incorporation into windrows may be a final requirement of the EPA's conditions.</p> <ul style="list-style-type: none"> <i>At this time morts are not macerated prior to removal from Hideaway Bay and it is not anticipated that this will occur (or provide benefit)) prior to incorporation into compost windrows. However, the Brown Bear windrow turner should provide a certain amount of mechanical degradation of morts as windrows are turned.</i> <i>Since the completion of the DP and EMP there has been some thought given to ensiling morts on feed barges on the marine farming leases as they are removed from pens. If this is implemented then this will involve some degree of maceration (on the feed barge) prior to composting. This management practise may be implemented over the coming years and would obviously have implications for the processing of morts at the compost facility, but are regarded as providing a better environmental outcome.</i> 	Are there facilities at Hideaway Bay for macerating morts prior to taking to site and incorporating into windrows?
Section 4.3.1 and elsewhere.	<p>Odours from sources other than from windrows have not been addressed in any great detail in the DPEMP and have not been considered as a factor in the odour impact study.</p> <ul style="list-style-type: none"> <i>It is not perceived that there will be any significant odour</i> 	Consider additional management commitments in regards to management of odour from leachate ponds, vehicles moving around on site, general housekeeping/site hygiene, etc.

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	<p><i>generation from vehicles moving around the site.</i></p> <ul style="list-style-type: none"> <i>The main source of potential odour from leachate ponds has been identified as being surface concentrated fish oils and the odour mitigation plan is combined with the leachate management plan; surface water from the primary leachate pond will be pumped back onto the active compost windrows. The primary collection point for fish oil will be a grease trap installed at the head of the primary leachate collection pond. The grease trap will be pumped on an 'as needs be' basis with the collected fats being returned to the active windrows.</i> 	
Section 4.4	<p>The Policy and Conservation Assessment Branch of DPIPWE advise the following:</p> <ul style="list-style-type: none"> Provided that measures outlined in the DPEMP to minimise attraction of scavengers to the site are implemented, it is considered unlikely that the development will have an impact on species listed under the Threatened Species Protection Act 1995. It is recommended that weeds on the site be managed to minimise the potential for weed propagules to be exported from the site in the final product. 	<i>For proponent's information only.</i>