

# Oaklands Ethanol Production Facility Air Quality Impact Assessment Report

Final Report



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# FINAL REPORT

Agri Energy Limited

Proposed Ethanol Production Facility, Oaklands, NSW Air Quality Impact Assessment

June 2007

Environmental Resources Management Australia

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## **GLOSSARY**

°C Degrees Celsius

AMG Australian Map Grid

AWS Automatic Weather Station

**BoM** Bureau of Meteorology

**DDGS** Dried Distillers Grain with Solubles

**EPA** Environment Protection Authority

ERM Environmental Resources Management

ha hectare

GLC Ground Level Concentration

LPG Liquefied Petroleum Gas

*mg/m*<sup>3</sup> Milligrams per metre cubed

 $\mu g/m^3$  Micrograms per metre cubed

NEPM National Environment Protection Measure

NSW DEC New South Wales Department of Environment and

Conservation

OU Odour Units

km kilometre

 $PM_{10}$  Particulate Matter (< 10µm size)

*Project Area* A six by six kilometre area surrounding the operations area.

TSP Total Suspended Particulates

VOC Volatile Organic Compounds

WDGS Wet Distillers Grain with Solubles

#### **EXECUTIVE SUMMARY**

Environmental Resources Management Australia Pty Ltd (ERM) has been engaged by Agri Energy Limited to prepare an air quality assessment to form part of an Environmental Assessment Report for the construction and operation of an ethanol production facility in Oaklands, New South Wales (NSW). The ethanol production facility will process a range of cereal grains to produce up to 200 million litres of ethanol annually. The site is located off Coreen Street, Oaklands NSW, approximately 615 kilometres south-west of Sydney via the Hume and Sturt Highways.

A Level 2 impact assessment, as described by the New South Wales Department of Environment and Conservation (NSW DEC, 2005), was carried out to determine potential impacts from the proposed development. A Level 2 assessment was undertaken as it is a realistic and comprehensive level of assessment based on site specific input data. Information was obtained on local meteorology, landuse, background ambient air quality and estimated emissions from the plant. Air dispersion modelling was undertaken using AUSPLUME 6.0 to estimate air quality impacts at nearby sensitive receptors.

The key contaminants considered in this assessment were:

- particulate matter;
- ethanol;
- combustion emissions, including nitrogen dioxide, sulphur dioxide and carbon monoxide;
- a range of Volatile Organic Compounds including benzene, toluene and hexane;
- acetaldehyde;
- methanol; and
- complex odours.

The dispersion modelling has indicated that predicted ground level concentrations at sensitive receptors are below the NSW DEC criteria for toxicity based pollutants, odorous pollutants and carbon monoxide, sulphur dioxide, nitrogen dioxide, total suspended particulate (TSP) and particulate matter less than 10 micron (PM $_{10}$ ) using site specific and worst case meteorological scenarios. Predicted ground level concentrations for odour were also below the nominated NSW DEC criteria of 3.0 odour units.

A range of mitigation measures (which have been included in the dispersion modelling) are proposed to minimise air emissions from the site. These include paving of haul roads, the installation of dust collectors, wet scrubbing technology to reduce emissions from the fermentation process and a thermal oxidiser on the dryer emission point.

#### 1 INTRODUCTION

## 1.1 BACKGROUND

Agri Energy Limited (AEL) seeks project approval for the development of an ethanol production facility at Oaklands, New South Wales (NSW), under Part 3A of the *Environmental Planning and Assessment Act*, 1979 (EP&A Act). Environmental Resources Management Australia Pty Ltd (ERM) has been engaged by AEL to prepare an environmental assessment for the construction and operation of the ethanol production facility, inclusive of an air quality impact assessment.

The ethanol production facility will be capable of processing a range of cereal grains (such as corn, wheat, barley and sorghum), which are grown in the Murray Region of NSW, to produce up to 200 megalitres (Ml) annually. It will include several holding dams, an effluent treatment facility and an irrigation area. The irrigation area will be irrigated with process wastewater as part of a wastewater recycling scheme. The proposal will have a development cost of in excess of \$30 million and is therefore a 'major project' to which Part 3A of the EP&A Act applies. As such, it will be determined by the Minister for Planning.

## 1.2 Scope Of Works

The scope of works for the air quality assessment is set out below;

- evaluation of the existing conditions at the proposed facility site including existing air quality, sensitive receptors in the area, site meteorology and topography. This was based on information made available by AEL or on its behalf, site visits conducted by ERM staff and information available in the public domain;
- details of the legislative and regulatory framework relevant to the proposed facility;
- review of potential air pollutant emissions and the development of an air emissions inventory for the entire development;
- assessment of the air quality impacts from construction and operation of the facility at existing and future sensitive receptors;
- a summary of possible site-specific ameliorative measures to be considered as part of the proposal based on the outcomes of the air quality assessment; and
- consultation with the NSW Department of Conservation (NSW DEC) throughout the assessment.

#### 1.3 GENERAL APPROACH TO THE ASSESSMENT

A Level 2 impact assessment, as described by the NSW DEC (2005) was carried out to determine potential impacts from the proposed ethanol development. A Level 2 assessment was undertaken as it is a realistic and comprehensive level of assessment based on site specific input data.

A typical Level 2 air quality impact assessment study for an industrial development involves the gathering, processing and presentation of information on:

- emission source details such as types, locations, dimensions, flow characteristics and rates of contaminant release to the atmosphere. A selection of significant or potentially significant contaminants is required, based on their expected rates of release and inherent properties to potentially cause environmental harm;
- meteorological conditions, which affect the behaviour of contaminant plumes released into the atmosphere;
- local geographical details such as topography and surface characteristics including land use and vegetation types;
- the existing levels of selected contaminants in the receiving environment;
- predicted future ambient concentrations, taking into account the existing baseline conditions. The prediction of ambient (usually ground-level) concentrations requires the use of mathematical models that simulate the release and dispersion of contaminant plumes from the facility;
- a basis for determining whether predicted contaminant concentrations are acceptable. This generally involves the use of air quality guidelines prepared by the relevant regulatory authorities; and
- measures incorporated into the design and/or management of the proposed development to mitigate air quality impacts, and in particular to mitigate the risks of adverse impacts under abnormal operating conditions.

The key contaminants considered in this assessment are:

- particulate matter;
- ethanol;
- combustion emissions, including nitrogen dioxide, sulphur dioxide and carbon monoxide;
- a range of Volatile Organic Compounds (VOCs) including benzene, toluene, hexane and cyclohexane;
- acetaldehyde;
- methanol; and
- complex odours.

#### 2 SITE DESCRIPTION AND LAND USES

#### 2.1 SITE LOCATION

The site of the proposed ethanol production facility is wholly within the local government area of Urana. It is accessed from Coreen Street at a point approximately 350m north-east of Oaklands. Oaklands is situated in the Murray region of NSW, approximately 615km south-west of Sydney via the Hume and Sturt Highways and 105km north-west of Albury.

Oaklands is a small country town located between Lockhart and Jerilderie. The Murray catchment is situated in southern New South Wales, and covers an area of approximately 3,535,000 hectares. The region is bounded by the Murray River to the south, the Murrumbidgee River catchment to the north, the Australian Alps (Great Dividing Range) to the east and by the convergence of the Murray and Murrumbidgee Rivers to the west.

The site comprises one land parcel, identified as Lot 2 of Deposited Plan (DP) 861032. The Oaklands township is located near to the south-western boundary of the site, across Daysdale Street.

A site location map is presented in *Annex A*, *Figure 1*.

#### 2.2 SITE LAYOUT

The site is approximately 130 hectares (ha) and currently comprises;

- agricultural cropping land (barley);
- some sparse tree cover along the eastern and western boundaries of the site; and
- the disused Oaklands-The Rock railway line which passes through the site from the northeast corner to the middle western boundary.

The proposed site layout is presented in *Annex A, Figure 2*. The ethanol production plant will be positioned in the central portion of the site. It will have a footprint of approximately 300m x 300m and will include:

- a bunded storage building where all chemicals and products (other than grain and ethanol) stored on the site will be kept;
- a maintenance workshop and store which also includes a crop services facility;

- two 7000 tonne grain storage silos with a maximum height of 35m (these will be the tallest buildings on the site);
- a 1300 tonne shift silo;
- a milling section including two hammermills;
- a fermentation structure;
- a liquefaction and saccharification area;
- a distillation structure and tower;
- LNG storage;
- a boiler building;
- · a cooling tower;
- a two storey building which houses the ring dryer for drying WDGS to produce DDGS;
- a bunded ethanol storage area which houses two anhydrous ethanol storage tanks, an off-spec storage tank and a gasoline storage tank; and
- a bunded storage building where WDGS and DDGS are stored.

A grain storage area comprising six grain bunkers will be located adjacent to the main buildings. These bunkers will be circumnavigated by a sealed oneway road.

The site access off Coreen Street will be upgraded and sealed internal roads will be constructed. There will be a weigh bridge, a light vehicle parking area with 40 spaces and a truck standing area. An office/ administration area will be constructed adjacent to the weighbridge and will comprise a reception area, offices, meeting rooms, bathroom facilities and a first aid room. Once the plant is operational the option of rail transportation of ethanol to the Victorian market may be investigated.

Three dams will be constructed on site as follows:

- 2Ml stormwater dam located adjacent to the production buildings to hold to hold and evaporate runoff from the buildings and hard surface areas. This water will also be available for irrigation or to supplement the raw water supply;
- 40Ml effluent dam located east of the production buildings to store process wastewater from the facility, for pumping to the irrigation area; and

• 200Ml raw water dam – located north-east of the production buildings to store water pumped from O'Dwyer Main Channel and supply all plant raw water needs (approximately 5.06Ml per day).

A pumping station and an additional 200Ml raw water dam will be constructed adjacent to O'Dwyer Main Channel. This dam will be used to supply the facility with water during the winter months when the channel is closed for maintenance. A subsurface pipeline will be constructed from the dam site to the on-site raw water dam to supply plant raw water needs.

AEL proposes to establish approximately 55ha of cropping, which will be irrigated with plant wastewater. The irrigation area will provide a future crop resource and its irrigation will facilitate reuse of any plant wastewater not recycled back into the process.

## 2.3 SURROUNDING LAND USES

The site is bounded by Daysdale Street, Coreen Street, Urana Road and the Ray Brooks & Co. bulk grain storage and terminal to the west and by agricultural land to the north, east and south. Two unoccupied rural dwellings and associated sheds are respectively located approximately 170m north and 1.1km east of the site. Two occupied rural dwellings and associated sheds are located 715m south-west and 170m north-west of the site, respectively. Land on the western side of Daysdale Street, opposite the south-west portion of the site, is occupied by a small area of dense vegetation and a recreational sporting oval, that is at the northern extent of the Oaklands township. The site and surrounding area is generally flat.

#### 3 PROCESS DESCRIPTION

#### 3.1 Introduction

The ethanol production facilities will be capable of processing a range of locally grown cereal grains, including wheat, corn, sorghum and barley. These grains must be transported to the site and stored prior to being input into the production process. The production of ethanol involves the milling of the grain to flour followed by a cooking, fermentation and distillation process. This process converts starch which comprises up to 75 per cent of the grain seed to sugar and subsequently to ethanol.

The ethanol to be produced by the plant will be a fuel blend stock. This product is dehydrated (water removed), stored and at the time of dispatch to market is mixed with a small percentage of petrol ('denatured'). The coproducts of the ethanol production process are WDGS and DDGS which are sold as stockfeed.

A detailed description of the ethanol production process is provided in the following sections.

## 3.2 GRAIN RECEIVAL AND STORAGE

At full capacity the ethanol production facility will process approximately 600,000 tonnes of cereal grains (such as wheat, corn, sorghum and barley) per annum. These will be preferentially sourced from the Murray region of NSW.

Grain will be hauled to the site principally via semi-trailers and B-double trucks. Trucks will enter the site and drive onto a weighbridge, where the gross weight will be recorded and grain samples will be taken for quality control purposes. The vehicle will then proceed to one of two unloading areas where the grain will be stored prior to processing. The two unloading areas are as follows:

- a grain receival platform where the grain will be discharged into a collection hopper and conveyed to one of two 7000 tonne storage silos; and
- a grain storage area, which will consist of six separate grain bunkers, each approximately 30m wide, 200m long and up to 20m high, with a capacity of 20,000 tonnes. Once a bunker is formed, it will be covered with plastic tarpaulin to protect the grain from parasites, birds, rain and wind.

A Grain Receiving Dust Collector collects the dust from the grain unloading operation and returns it to the process ahead of the hammermill.

After unloading, the vehicle will return to the weighbridge and then exit the site to Coreen Street.

The ethanol production process requires a constant supply of grain. At full production of 200Ml of ethanol per year, the plant will require approximately 1600 tonnes of grain per day or 67 tonnes per hour. This grain will be fed to the plant from a small 'shift silo' with a 1300 tonne capacity. Grain is to be transported to the shift silo via two ways, dependent on whether the grain is being sourced from the grain storage silos or from the bunker storage area.

For retrieval from the storage silos, a screw feeder and elevator at the bottom of the source silo will be used to convey grain to the shift silo. This system will include dust extraction and filtering facilities to eliminate dust emissions.

For retrieval from the bunker storage area, grain will be picked up by a frontend loader and fed into a mobile dump hopper positioned over a belt conveyor. The belt conveyor will feed the grain to the main feed conveyor and on to a screening station which will include a dust collecting and filtering system to eliminate dust emissions. The grain will then be elevated to the shift silo.

## 3.3 MILLING AND SLURRY PREPARATION

As part of the production process the grain needs to be milled and then mixed into slurry via the following process:

- 1) grain from the shift silo will be gravity fed to the hammermill where it is milled;
- 2) the hammermill dust collectors extract dust by vacuum from appropriate points in the milling system circuit and direct it to a bag filter, which will collect the dust and return it to the mill discharge conveyor;
- 3) a monitored weight of milled grain flour will be mechanically conveyed to a pug mixer, where a 'slops mix', comprising recycled process water from the distillation and evaporation operations will be added to form a slurry of appropriate density;
- 4) from the pug mixer, the slurry mix will be directed to a mixing tank where additional slops or process water can be added to make up the correct slurry density and percent solids; and
- 5) the mixed slurry preparation (mash) will be pumped from the mixing tank to the pre-liquefaction tank via one of two discharge pumps (operating and spare) for liquefaction.

#### 3.4 CHEMICAL PREPARATION

A specific area in the enclosed liquefaction and saccharification building has been designed to receive and prepare a range of chemicals used as part of the ethanol production process. The chemical preparation area consists of a series of small mixing tanks fitted with access platforms, mixing agitators (where required), dosing delivery pumps and pipe work. Packaged chemicals will be fed by forklift or manually from the bag or container into the respective mixing tank. Once prepared, the chemical mix is to be piped to the required process stage.

## 3.5 LIQUEFACTION STAGE

Liquefaction is the process of converting insoluble starch in the mash to a soluble starch mix by enzyme reaction at an elevated temperature. An enzyme mix prepared in the chemical preparation area is metered as a liquid into the pug mixer and the pre-liquefaction tank.

The mash is strained and heated, and then pumped to the liquefaction tank in the preparation building for processing of the insoluble starch. The liquefaction tank is sealed, insulated and agitated and the reaction takes up to four hours depending upon grain type.

From the liquefaction tank the mash is pumped to the pre-saccharification tank via mash coolers, which flash cool the mash with non-contact cooling water and lower its temperature to approximately 60 degrees Celsius.

#### 3.6 SACCHARIFICATION STAGE

Saccharification is the enzymatic conversion of the soluble starch to glucose. The reaction occurs in the pre-saccharification tank which is sealed, insulated and agitated, and continues in the pre- fermentor and the fermentor tanks. The reaction requires the addition of another enzyme mix, which is metered as a liquid into the pre- saccharification tank.

From the pre-saccharification tank the mash is pumped to a pre-fermentor tank via coolers which again flash cool with non-contact cooling water. Vented emissions are collected and sent to the process vent scrubber, where they are scrubbed, using chilled water. Emissions from the scrubber are discharged to the atmosphere, and the water is returned to the beer well for distillation of the dissolved alcohol.

#### 3.7 FERMENTATION STAGE

Fermentation is the conversion of glucose to ethanol and carbon dioxide by the action of yeast. Propagated yeast and other chemicals that promote and sustain the reaction are added to the pre-fermentor tank. The mash containing yeast and nutrient is then pumped to one of three stainless steel fermentor tanks. Once a tank is filled, it is allowed to react for the required time to achieve maximum conversion of sugars to ethanol (around 45 to 55 hours). This process produces a fermented mash called beer which is emptied to a beer well. The empty tank is then cleaned by the addition of cold caustic soda solution. Once cleaned the tank is filled again for the next cycle. Fermentation is a batch process that occurs continuously by using all three fermentor tanks in series.

The carbon dioxide produced by the fermentation reaction is vented to a fermentation vent scrubber where water is used to scrub residual amounts of ethanol from the carbon dioxide. The cleaned, scrubbed carbon dioxide gas is emitted to atmosphere while the scrubber water is pumped into the beer well.

The beer contains about ten per cent ethanol in addition to non-fermentable grain solids. The beer well acts as a buffer tank to receive the reacted ethanol and mash mix for feed to the distillation stage.

## 3.8 DISTILLATION, EVAPORATION AND DEHYDRATION STAGE

For distillation, beer is pumped from the beer well in the fermentation area to the stainless steel mash distillation column, which will contain a number of heating trays. The column operates under a vacuum at a temperature of up to 125 degrees Celsius and is approximately 12 metres high. Distillation occurs in this column and involves boiling off the ethanol from the beer with steam to produce a hydrous ethanol product containing 95 per cent ethanol and five per cent water. The steam is produced from three boilers which are fuelled by LNG.

The hydrous ethanol is then dehydrated to a fuel ethanol grade by superheating vapour and liquid from the top of the rectifier distillation column and transferring it to molecular sieve vessels, which remove any water from the ethanol product. Product ethanol is then cooled, filtered and transferred to the ethanol storage area.

Vapours from the distillation area condenser system flow to the process vent scrubber where chilled water is used to scrub residual amounts of ethanol from the air before it is discharged from the scrubber stack to the atmosphere. The water from the scrubber is pumped to the beer well.

The by-product of distillation is slurry containing all unfermentable products, principally water and distiller's grain. This slurry is transferred from the base of the mash distillation column to a centrifuge, which removes the majority of water. The wet distiller's grain can then be extracted from the centrifuge as a wet cake.

The liquid by-product is transferred to a slops tank where approximately 60 per cent is returned to liquefaction for addition to the milled grain flour at the start of the process. The remaining 40 per cent is evaporated in a continuous evaporator to reduce the water content and thicken the product to a more concentrated form (syrup), which is pumped to a syrup collection tank. The water stream from the evaporator system is used as process water at the mixer or flows to the secondary treatment plant.

The wet cake (extracted from the centrifuge) is then combined with the syrup in a paddle mixer to form a product containing approximately 30% solids, called WDGS. Half of this product will be sold in this form. The remaining half will be transferred to a flash dryer where it is dried by steam to produce DDGS which has approximately ten per cent moisture content. The dryer exhaust passes through a Thermal Oxidizer which incinerates the emissions from the dryer and then discharges to the atmosphere. The DDGS is cooled and conveyed to the storage and loadout area.

#### 3.9 DISTILLERS GRAIN STORAGE AND DISPATCH

WDGS and DDGS will be stored in a dual-purpose shed, which has a concrete bunded bunker for WDGS storage and open-fronted concrete bins for DDGS storage. WDGS will be pumped into B-doubles or semi trailers for trucking to market. A front end loader will be used to pick up DDGS from the bins and load B-doubles or semi trailers for trucking to market. Dust generated during the DDGS loading process is to be collected by the DDGS Loadout Dust Collector.

## 3.10 ETHANOL STORAGE AND DISPATCH

The cooled ethanol will flow to one of two shift storage ethanol receiver tanks in the storage area. After passing relevant quality tests it will be transferred to the product storage tanks. The product storage tanks are sized to provide between six and seven days of total ethanol storage at full flow rate (200Ml/yr). Occasionally, problems with the plant may result in production of off-spec product. If this occurs, the product will be diverted to an Off-Spec Storage Tank.

All storage tanks are vented through a vent pipe fitted with an in-line flame arrester and a breather vent valve. All vapors from the gasoline unloading and ethanol loading are collected in vapour recovery lines and sent to the road tanker or the source tank, respectively.

For the production of fuel grade ethanol, denaturant from the denaturant storage tank is to be metered continuously into the pure ethanol stream during transfer from the product storage tank to the road tanker. This will yield a finished product containing five per cent denaturant. The denaturant tank is sized to hold sufficient denaturant to cover ten days ethanol production.

Ethanol product will be transported to market via B-double trucks.

## 4 AIR QUALITY LEGISLATION AND ASSESSMENT GUIDELINES

This section details the relevant national and state air quality criteria, used in this assessment.

# 4.1 AIR QUALITY ISSUES

The main air quality issues associated with this project are:

- particulate matter and products of engine combustion generated during construction;
- particulate emissions from dust collectors (grain handling dust collector, DDGS loadout dust collector and milling dust collectors);
- combustion emissions from the liquefied natural gas (LNG) fired boilers and dryer;
- ethanol, odour and other pollutant emissions from various stages of the process; and
- fugitive ethanol and other pollutant emissions from ethanol storage tanks.

The following sections outline the air quality pollutants assessed for this project and the regulatory framework associated with these potential emissions.

## 4.2 RELEVANT NSW REGULATORY FRAMEWORK

The air quality assessment was carried out in accordance with the following NSW DEC policies:

- Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales, NSW DEC, August 2005;
- Technical Framework– Assessment and Management of Odour from Stationary Sources in NSW, NSW DEC, November 2006; and
- Technical Notes Assessment and Management of Odour from Stationary Sources in NSW, NSW DEC, November 2006.

#### 4.3 NATIONAL ENVIRONMENT PROTECTION MEASURES

The National Environment Protection Measure (Ambient Air Quality) 1998 (NEPM) is a Commonwealth Government initiative which aims to achieve nominated standards of air quality within ten years. Air quality standards for six major air pollutants (carbon monoxide, nitrogen dioxide, photochemical oxidants, sulfur dioxide, lead and small airborne particles) have been set.

All states and territories including NSW have adopted the NEPM air quality goals for pollutants, outlined in *Table 4.1* below. These standards are legally binding on all levels of government. Measurement and concentration averaging periods are based on critical exposure times for health impacts and are thus different for various pollutants.

Table 4.1 NEPM (Ambient Air Quality) Standards

Pollutant	Averaging Period	Maximum Concentration	Maximum Allowable Exceedences
Carbon Monoxide	8 hours	9.0 ppm	1 day in a year
Nitrogen Dioxide	1 hour	0.12 ppm	1 day in a year
	1 year	0.03 ppm	None
Photochemical oxidants	1 hour	0.10 ppm	1 day in a year
	4 hours	0.08ppm	1 day in a year
Sulphur dioxide	1 hour	0.20 ppm	1 day in a year
	24 hour	0.08 ppm	1 day in a year
	1 year	0.02 ppm	None
Lead	1 year	$0.5  \mu g/m^3$	None
Particles as PM <sub>10</sub>	24 hour	50 μg/m3	5 days in a year.
1. ppm - parts per milli	on		

In addition, the draft NEPM for particulate matter less than 2.5 microns specifies criteria of 25  $\mu g/m^3$  (24 hour average). However the NSW DEC has not formally adopted this as an impact assessment criterion. The NEPM criteria have been incorporated into the NSW DEC impact assessment criteria (discussed below in *Section 4.4*).

Apart from criteria pollutants, there has been an increasing focus on regulating a large group of contaminants collectively known as air toxics or 'hazardous air pollutants' (HAPs). Air toxics include the following general categories of compounds: volatile and semi volatile organic compounds, polycyclic aromatic hydrocarbons, heavy metals and aldehydes. In December 2004, the National Environment Protection Council (NEPC) released the Air Toxics NEPM, which contains investigation levels for five common air toxics (see *Table 4.2*). The NSW DEC has not formally adopted the Air Toxics Investigation levels as impact assessment criteria.

Table 4.2 Air Toxic NEPM Investigation Levels

Pollutant	Averaging Period	Monitoring Investigation Level	Goal
Benzene	Annual	0.003 ppm	8 year goal is to gather sufficient
			data nationally to facilitate
			development of a standard
Benzo(a)pyrene as a	Annual	$0.3 \text{ ng/m}^3$	8 year goal is to gather sufficient
marker for Polycyclic			data nationally to facilitate
aromatic hydrocarbons			development of a standard
Formaldehyde	24 hours	0.04 ppm	8 year goal is to gather sufficient
			data nationally to facilitate
			development of a standard
Toluene	Annual	1.0 ppm	8 year goal is to gather sufficient
	24 hours	0.1 ppm	data nationally to facilitate
			development of a standard
Xylenes (total isomers)	Annual	0.25 ppm	8 year goal is to gather sufficient
	24 hours	0.2 ppm	data nationally to facilitate
	0.000	·· · · · · · ·	development of a standard

The focus of this air quality assessment has been to assess predicted air quality impacts against the NSW DEC impact assessment criteria. However, the assessment of impacts against the Air Toxic NEPM investigation levels and the Ambient Air Quality NEPM standards has been conducted where relevant.

## 4.4 POEO ACT AND POEO REGULATION (2002)

The Protection of the Environment Operations Act 1997 (POEO Act) is the major legislation governing environment protection in NSW. Standards of concentration are prescribed by the Protection of the Environment Operations (Clean Air) Act (2002) and it is an offence under the POEO Act for emissions of air contaminants to exceed these levels. These are stack emission limits and the maximum emissions which are permissible for an industrial stack source anywhere in NSW (NSW DEC, 2005). As these limits do not take into account meteorology and background air quality, a site specific impact assessment is needed to determine the impact of emissions from the plant on the surrounding area.

The emission guidelines relevant to the proposal are presented in *Table 4.3*.

Table 4.3 Standards of Concentration - POEO Regulation (2002)

		Concentration		
Contaminant	Activity	Scheduled Premises	Non-scheduled Premises	
Solid Particles	Dust Collectors	50 mg/m3	100 mg/m3	
	DDGS Dryer	50 mg/m3	100  mg/m3	
	Cooling Towers	50 mg/m3	100  mg/m	
	Boilers	50 mg/m3	100  mg/m	
Nitrogen Dioxide	Boilers	$350 \mathrm{mg/m3}$	-	
	Dryer - thermal oxidiser	350 mg/m3	-	
VOCs	Boilers	40  mg/m3	-	
	Dryer - thermal oxidiser	20 mg/m3		
Carbon monoxide	Boilers	125 mg/m3	-	
	Dryer - thermal oxidiser	125 mg/m3		
Smoke	Loadout Flare	No visible emission other		
		than for a total of period		
		of no more than 5 minutes		
		in any 2 hours.		
	Dryer - thermal oxidiser	Ringelmann 1 or 20%		
		opacity		
	Boilers	Ringelmann 1 or 20%	Ringelmann 1 or	
		opacity	20% opacity	
1. VOC's - Volatil	e Organic Compounds			

## 4.5 NSW DEC IMPACT ASSESSMENT CRITERIA

The NSW DEC publish Impact Assessment Criteria for air pollutants in their document "Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales" (2005). This document is referred to in Part 4: Emission of Air Impurities from Activities and Plant in the Protection of the Environment Operations (Clean Air) Regulation 2002. Industry has an obligation to ensure compliance with the requirements specified in this Regulation.

The impact assessment criteria relevant to the proposed ethanol facility are presented in *Table 4.4*. These are the criteria which the predicted ground level concentrations will be compared to.

Table 4.4 NSW DEC Impact Assessment Criteria

Pollutant	Averaging Period	Concentration
Carbon Monoxide	15 mins	$100 \mathrm{mg/m^3}$
	1 hour	$30 \text{ mg/m}^3$
	8 hours	$10 \text{ mg/m}^3$
Nitrogen Dioxide	1 hour	$246  \mu g/m^3$
	Annual	$62 \mu\mathrm{g/m^3}$
$PM_{10}$	24 hours	$50 \mu\mathrm{g/m^3}$
	Annual	$30 \mu\mathrm{g/m^3}$
Sulphur Dioxide	10 mins	$712  \mu g/m^3$
	1 hour	$570 \mu\mathrm{g/m^3}$
	24 hours	$228  \mu g/m^3$
	Annual	$60  \mu g/m^3$
<b>Total Suspended Particulates</b>	Annual	$90  \mu g/m^3$

<sup>1.</sup> Source: "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW" (NSW DEC, 2005)

## 4.5.1 Individual Toxic Air Pollutants

The impact assessment criteria for individual toxic air pollutants are detailed below in *Table 4.5*. Ground level concentrations must be minimised to the maximum extent achievable and the impact assessment criteria are applied at and beyond the site boundary.

Table 4.5 Toxicity Impact Assessment Criteria

Pollutant	Averaging Period	Concentration (mg/m³)
Benzene	1 hour	0.029
Formaldehyde	1 hour	0.02
n-Hexane	1 hour	3.2
Polycyclic Aromatic	1 hour	0.0004
hydrocarbons (PAH)		

<sup>1.</sup> Source: "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW" (NSW DEC, 2005)

## 4.5.2 Odorous Air Pollutants

The NSW DEC document 'Assessment and management of odour from stationary sources in NSW' (NSW DEC 2006) provides guidelines for the impact assessment of individual and complex mixtures of odorous contaminants.

The impact assessment criteria for relevant odorous pollutants are detailed below in *Table 4.6.* The criteria are applied at the nearest existing or future sensitive receptor.

Table 4.6 Odour Impact Assessment Criteria

Pollutant	Averaging Period	Concentration (mg/m³)
Acetaldehyde	1 hour	0.042
Ethanol	1 hour	2.1
Methanol	1 hour	3.0
Toluene	1 hour	0.36

<sup>1.</sup> Source: "Approved Methods for the Modelling and Assessment of Air Pollutants in NSW" (NSW DEC, 2005)

Presently odour strength is measured under laboratory conditions by taking field samples of potentially odorous air, diluting these samples with clean air and subsequently subjecting the samples to a panel of qualified people. The number of dilutions of the sample with clean air to reach the threshold of detection by panel members is recorded in a procedure known as "dynamic olfactometry".

The NSW DEC odour criteria for complex odours take into account the range of sensitivity to odours within a community to develop a statistical approach based on a function of population size. The criteria are applied at the nearest existing or future off site receptor. The impact assessment criteria for odour are detailed below in *Table 4.7*.

Table 4.7 NSW DEC Odour Impact Assessment Criteria

Pollutant	Population of affected community	Odour performance criteria (O.U)
Odour	Urban (≥ 2000)	2.0
	~ 500	3.0
	~ 125	4.0
	~ 30	5.0
	~ 10	6.0
	Single residence ( $\leq \sim 2$ )	7.0
1. O.U Odour Unit		

The estimated population of the town of Oaklands is approximately 350. As such, an odour performance criterion of 3 OU has been used to assess odour impacts from the Oaklands facility.

## 4.6 NSW DEC ACTION FOR AIR

Action for Air is the NSW Government's 25 year air quality management plan. It primarily targets smog and particle pollution in the Greater Metropolitan Region (GMR) of NSW. There are no specific requirements in the document that relate to the proposed facility.

#### 4.7 BUFFER DISTANCE

Buffer distances are a means of separating industrial, residential and other sensitive land uses thereby minimising any potential adverse air emission impacts.

Buffer distances are usually implemented to protect the immediate area from ongoing emissions and accidental emissions that may occur due to equipment failure, accidents and abnormal weather conditions.

The Urana Shire Council does not specify any buffer zone criteria for industry within the shire.

#### 5 EXISTING ENVIRONMENT

This section details the existing air quality environment of the project area. It also details the prevalent meteorological conditions at the proposed ethanol facility and the existing background air quality.

#### 5.1 GENERAL METEOROLOGICAL CONDITIONS

The site meteorology plays a major role in determining the location and the degree of offsite impacts of activities proposed to be carried out at the ethanol production facility. Air dispersion modelling requires information about the dispersion characteristics of the area. In particular, data is required on wind direction, wind speed, temperature, atmospheric stability and mixing height.

There has been no meteorological data collected at the proposed site. As such, a meteorological file suitable for modelling using AUSPLUME has been prepared for ERM by PDS Consulting. The meteorological file utilised data on wind speed, wind direction and ambient temperature from an Automatic Weather Station (AWS) at Deniliquin, which is approximately 110km to the west of Oaklands. Data coverage for the meteorological file is 99.5%, and all four seasons are well represented.

Data from Deniliquin is considered representative of Oaklands due to the similar environmental characteristics in the vicinity of the AWS. Windroses from the Deniliquin BOM AWS and a BOM AWS site located at Yanco Agricultural Institute, 130km north of the site have been compared. On an annual basis, the two sites generally exhibit similar wind patterns, with predominant winds from the southwest at both sites.

Information as to the development of the meteorological file is included in *Annex B*.

## 5.2 CLIMATE

Long term climate data based on 9am and 3pm data is available for Urana (approximately 25 kilometres to the north of the site), Tocumwal (approximately 80 kilometres to the southwest of the site) and Berrigan (approximately 50 kilometres to the southwest of the site). Temperature and rainfall data for the three sites is presented in *Annex A, Figure 3*. Climate data for Deniliquin has also been included for comparison. Data from all sites display similar long term average climate averages.

Climate data for Urana (Post Office) is presented in *Table 5.1* below. This site has been collecting data for the longest period of time (133 years) in the region and is the closest station to the proposed site at Oaklands.

# *Temperature*

On average, January is the warmest month at Urana, with a mean daily maximum of 32.9 C and a mean daily minimum of 16.3 C. The coolest month is July with a mean daily minimum temperature of 5.1 C and a mean daily maximum of 14.2 C.

# Rainfall

The mean annual rainfall at Urana is 442.2mm. The mean number of rain days annually over this period is 67.4 days. On average, June is the wettest month with a mean monthly rainfall of 45.7mm, while November is the driest month with an average of 30.6mm.

Table 5.1 Climate Data for Urana (1871 - 2004)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Daily Maximum Temperature													
Mean (°C)	32.9	32.4	29.2	23.6	18.7	14.8	14.2	16	19.8	23.5	27.7	31.1	23.6
Daily Minimum Temperature													
Mean (°C)	16.3	16.3	13.9	9.4	6.1	3.6	3.2	4.1	6.3	8.8	11.9	14.6	9.6
9 am Mean													
Temperature (°C)	23.9	22.3	20.5	15.7	10.8	7.2	7	8.6	11.7	16.5	18.5	21.4	15.1
Humidity (%)	53	58	58	72	84	88	87	86	73	63	56	51	69
3 pm Mean													
Temperature (°C)	31.9	30.2	27.7	22.3	17.2	14.9	13.7	14.6	17.2	21.1	24.7	30.4	21.5
Humidity (%)	31	34	33	50	58	59	60	60	50	50	36	25	46
Rainfall													
Mean (mm)	32.2	32.7	33.5	32.8	42.6	45.7	39.2	40.1	38.7	42.7	30.6	21.4	442.2
Raindays													
Mean (Number)	3.5	3.2	3.8	4.6	6.5	8.2	8.3	8.5	6.9	6.3	4.3	3.6	67.4

<sup>1.</sup> Station number 074110; Latitude -35.3305 S; Longitude 146.2652 E

<sup>2.</sup> Source - Bureau of Meteorology, Commonwealth of Australia.

### 5.3 WINDROSE SUMMARY

Wind direction and wind speed data has been obtained from a Bureau of Meteorology (BoM) AWS located at Yanco, approximately 130km north of the site. The Yanco wind data has been used based on consultation with the Bureau of Meteorology climate group. Wind data from the Yanco site is considered to be representative of the long term climate at Oaklands as they are both situated in the south western NSW plains. There are other BOM weather stations closer to Oaklands (see above), however these sites do not collect sufficient information to allow for construction of windroses.

On an annual basis, winds are predominantly from the southwest and north, with smaller contributions from the east. Calm conditions are evident approximately 1% of the time. Windrose diagrams are presented in *Annex C*.

- During summer, predominant winds are from the southwest, with smaller contributions from the south and east.
- During autumn, predominant winds are from the east and southwest, with smaller contributions from the south.
- During winter, predominant winds are from the north, with smaller contributions from the east.
- During spring, predominant winds are from the southwest and west, with smaller contributions from the north and east.

### 5.4 STABILITY CLASS

Stability class is used to determine the rate at which a plume disperses by turbulent mixing. Each stability class is associated with a dispersion curve, which is used by a dispersion model to calculate plume dimensions and odour concentrations downwind of the source.

Stability classes are categorised from A to F. Stability class A refers to highly unstable conditions, class D refers to neutral conditions and stability class F refers to stable conditions. The intermediate classes not mentioned refer to conditions between those described above.

*Table 5.2* shows the frequency of occurrence of the different stability categories in the meteorological data file. The data in this table indicates that the atmosphere is quite stable (stability classes D, E, F) for a large percentage of the time (82%). This indicates that poor dispersion conditions may occur in the Oaklands area.

Table 5.2 Frequency of Stability Classes

Stability Class	Percentage (%)
A	1
В	6
С	12
D	48
E	22
F	12
1. Source: PDS Consulting	

# 5.5 BACKGROUND CONCENTRATIONS

### 5.5.1 General

Background air quality is a measure of the existing air quality in the project area. The background air quality is due to sources (natural or man made) other than the site. This is important when considering cumulative impacts on sensitive receptors in the area.

A review of the State of the Environment Report (SOE) for Oaklands for the year 2000 indicates that the Urana Shire Council did not undertake any air monitoring within the reporting period and therefore definitive statements on ambient air quality within the region cannot be made.

A desktop review of the National Pollutant Inventory (NPI) of reported emissions from fixed and mobile sources in the vicinity of the site was also undertaken to obtain an indication of existing industries in the project area. The only reporting facility in the Oaklands region is Wangamong Piggery. This facility is located at a distance greater than 10kms from the proposed ethanol facility site. As such, this facility is not likely to contribute to background concentrations of odour from the ethanol facility.

### 5.5.2 Air Toxics

The NSW DEC (then the NSW EPA) undertook a sampling program of 17 dioxins, 41 organic compounds, 11 polycyclic aromatic hydrocarbons (PAHs) and 12 heavy metals at 25 sites within NSW. The EPA study found that for most organic compounds ambient levels were very low, and well below the current international standards or benchmarks. This, combined with the lack of heavy industry in the Oaklands area, indicates that background concentrations of air toxics in the Oaklands area are likely to be low and the proposed ethanol facility has the potential to be the major contributor of these pollutants in the area.

The compounds identified by the study as of most concern in NSW were benzene, 1-3 butadiene and PAHs. Of these pollutants only benzene is proposed to be emitted from the operations at the Oaklands facility. Sampling in the urban fringe areas of Sydney indicated that levels of benzene were below 1 part per billion by volume (ppbV). As Oaklands is located in a rural setting with lower volumes of traffic, levels of benzene are likely to be less than this value. As such, background levels of this pollutant are not considered to be significant and have not been included in this impact assessment.

### 5.5.3 Particulate Matter

Small amounts of particulate matter are likely to be present from surrounding agricultural activities and roads, however, existing background concentrations are not considered to be significant and background particulate matter has not been considered in the air quality assessment.

### 5.5.4 Summary

Contributors to background air quality, such as agricultural activities and traffic, are anticipated to be minor, relative to the proposed facility. As such, background contributions have not been included in the assessment.

### 6 POTENTIAL EMISSIONS - CONSTRUCTION PHASE

The potential emission sources from the construction phase of the ethanol production facility are described below.

### 6.1 CONSTRUCTION IMPACTS

Emissions to the atmosphere from construction activities are primarily particulate matter. Potential impacts from particulate matter during short term construction activities are often nuisance related rather than health related. Combustion emissions such as carbon monoxide, carbon dioxide, particulate matter and nitrogen oxides from the movement of trucks and vehicles onsite are also likely to occur.

Particulate emissions from the site may occur during the construction phase from construction equipment, earthworks and unsealed exposed surfaces. Dust generating activities may include road construction, plant construction and truck movements.

Particulate matter mitigation measures will be implemented to minimise particulate emissions during the construction phase. These will include the watering of exposed surfaces when necessary and the minimisation of dust generating activities on days of high risk dust generation. It is expected that particulate emissions during the construction phase of the project will be minimal because:

- the proposed works do not require large areas of land to be exposed; and
- the main access road is to be sealed, therefore minimising the generation of dust from truck movements.

It is expected that particulate matter impacts will be minimal, short-term in duration and limited to the localised area of the site. As such, particulate matter from construction activities has not been included in the dispersion modelling assessment.

Particulate and other combustion exhaust emissions from mobile equipment are expected to be a minor contributor of overall particulate emissions from the site, due to the small fleet onsite. As such, emissions from combustion engines have not been included in the modelling assessment.

### 7 POTENTIAL EMISSIONS - OPERATIONAL PHASE

The potential emission sources from the operation phase of the ethanol production facility are described below.

### 7.1 BACKGROUND

Potential emissions from the ethanol facility have been estimated based on the design estimate of a maximum yearly production of 200Ml of ethanol.

The major emissions to the atmosphere expected from operational phase of the proposed plant include:

- ethanol emissions from various stages of the process, which have the potential to be odorous;
- dust from the milling operations on the site; and
- combustion emissions from the LNG gas fired boiler and dryer.

A diagram indicating the major sources of emissions is presented in *Annex A*, *Figure 4*.

### 7.2 PARTICULATE EMISSIONS

Particulate matter emissions will be generated as a result of the operation of the ethanol facility from the following three main sources:

- wheel generated particulate matter as a result of truck movements onsite;
- emissions as a result of grain receival, storage and processing; and
- emissions as a result of blow down of the cooling tower.

Minimisation of particulate matter emissions on the site is an important part of the ethanol production process, in order to maintain the purity of the ethanol product and mitigate the risk of explosion as a result of the ignition of grain dust. As such, dust mitigation measures will be put in place to reduce particulate emissions as far as practicable. These measures are discussed further in *Section 10.2.1*.

Although emissions of particulate matter are likely to be low as a result of the measures outlined above, particulate emissions as a result of emissions from the dust collection systems have been included in the modelling assessment. The estimation of these emission sources is outlined below. Emissions have been estimated for Total Suspended Particulate (TSP), which is a nuisance indicator, and particulate matter less than 10 microns (PM<sub>10</sub>).

## 7.2.1 Dust Extraction System

Four dust collectors are proposed for the facility, which will incorporate fabric filter technology. The dust collectors will service grain handling and receival, hammermill operations, and DDGS loadout.

Two dust collectors will service the grain milling operations and will discharge to air from exhaust stacks approximately 12.2m above the ground, with a velocity of 17.32 metres per second (m/s) and a flowrate of 15,300  $m^3$ /hour.

The grain receival dust collector will discharge to air from an exhaust stack approximately 9.14m above the ground, with a velocity of 25.34 m/s and a flowrate of 81,600 m<sup>3</sup>/hour.

The DDGS loadout dust collector will control emissions associated with loading DDGS into transportation for removal from the site. This dust collector will discharge to air from an exhaust stack approximately 12.2m above the ground, with a velocity of  $18.2 \, \text{m/s}$  and a flowrate of  $8,500 \, \text{m}^3/\text{hour}$ .

The dust collectors have been included in the model as point sources. Discharge from each dust collector has been conservatively modelled as occurring 24 hours a day. Emission estimations have been based on information supplied by the vendor. The  $PM_{10}$  emission rate has been assumed to be 50% of the TSP rate<sup>1</sup>. Predicted emissions from the dust collector source are presented below in *Table 7.1*.

Table 7.1 Estimated Particulate Emissions - Dust Collectors

Source	Quantity -	Emission (kg/hr)		Total Emissions (g/sec)		
Source	Qualitity -	TSP	PM <sub>10</sub>	TSP	PM <sub>10</sub>	
Dust Collector - Grain	24 hours	0.93	0.47	0.26	0.13	
Handling						
Dust Collector - DDGS	24 hours	0.095	0.048	0.027	0.013	
loadout						
Dust Collectors - Milling	24 hours	0.35	0.18	$0.097^{1}$	$0.049^{1}$	
operations						
1. Emissions for one dust coll	1. Emissions for one dust collector					

.

 $<sup>^{\</sup>rm 1}$  US EPA AP 42 Section 9.9.1 Grain Elevators and Processes, April 2003.

## 7.2.2 Particulate Emissions from Cooling Towers

During the process of cooling tower blowdown (which is anticipated to occur approximately once per week) particulates will be emitted into the air with fine water droplets. It is anticipated that these water droplets will evaporate and the particles will remain in the air.

Estimates of the emissions of particles from this activity have been provided by AEL and are based on a drift loss of 0.005% of the recirculation rate of the cooling tower. Estimated emissions are provided below in *Table 7.2*. Information is not available as to the percentage of the TSP that is emitted as PM<sub>10</sub>. Therefore the full TSP emission rate has conservatively been used to assess PM<sub>10</sub> concentrations. It has been estimated that this activity may occur for 12 hours a day, five days a week; however emissions have been modelled as occurring on a constant basis. Emissions will occur from two cooling tower cells.

Table 7.2 Estimated Particulate Emissions - Cooling Tower Blowdown

Source	Quantity -	Emission (kg/hr)		Total Emissions (g/sec)	
Source	Quantity	TSP	$PM_{10}$	TSP	$PM_{10}$
Cooling Towers	60 hours per week	1,778	1,778	0.158	0.158

<sup>1.</sup> Emissions are total emissions from both cooling tower cells.

## 7.3 COMBUSTION EMISSIONS FROM BOILERS

Two boilers will be installed at the ethanol plant, and will exhaust through two stacks, at a height of 13.7m above ground level and an exit velocity of 20.2m/s. The boilers will burn LNG in order to provide steam to be used in the process.

Emissions from the boilers have been estimated using the National Pollutant Inventory *Combustion in Boilers Emission Estimation Tool*. This database uses information such as the predicted annual fuel usage in each boiler and the type of boiler to predict emissions from the boiler source.

Fuel use has been estimated at maximum boiler capacity of 8,992 tonnes per year for each boiler. The US EPA AP 42 Section 1.5: Liquified Petroleum Gas Combustion states that for natural gas all PM is less than 10 microns in diameter (US EPA, 1996). Therefore TSP emissions have been assumed to be equal to  $PM_{10}$ . Emissions predicted from the boiler source are presented below in *Table 7.3*.

Table 7.3 Predicted Emissions - Boilers

Contaminant	Predicted Emissions (kg/year)	Predicted Emissions (g/s)
Benzene	0.8	0.000025
Carbon monoxide	32000	1.015
Formaldehyde	28	0.00089
n-Hexane	680	0.022
Oxides of nitrogen	52000	1.65
Particulate Matter as PM <sub>10</sub>	2800	0.089
Polycyclic Aromatic	0.26	0.0000082
Hydrocarbons (PAH)		
Sulphur dioxide	196	0.0062
Toluene	1.26	0.00004
Total Suspended	2800	0.089
Particulates (TSP) <sup>2</sup>		

- 1. Predicted emissions are total emissions from the two boilers.
- 2. TSP emissions were estimated assuming  $PM_{10} = 100\%$  of TSP

It has been assumed for modelling purposes that 100% of the nitrogen oxide emissions are nitrogen dioxide. This is conservative as in reality this percentage is likely to be much lower. Emissions of other trace elements will occur from the combustion of LNG, however these emissions are expected to be negligible and as such have not been modelled.

## 7.4 EMISSIONS FROM THE FERMENTATION STAGE

All of the emissions from the fermentation process will be directed through a wet scrubber (herein the fermentation scrubber), which will remove VOCs from the exhaust gas. VOC emissions from the distillation and evaporation processes will also be directed through a wet scrubber (herein the process vent scrubber). Emissions from both of these scrubbers will be directed through a single discharge point located on the fermentation plant. Emissions from the scrubbers will consist mainly of carbon dioxide, with a smaller quantity of VOCs such as ethanol, aldehydes and methanol. There is no NSW DEC impact assessment criteria for carbon dioxide, as it is considered to be primarily a greenhouse gas indicator. As such, carbon dioxide has not been assessed in the air quality assessment.

The removal efficiency of the fermentation scrubber has been provided by the vendor at 99.4% for ethanol, 17% for aldehydes and 100% for methanol. The process vent scrubber has an efficiency of 97.6% for ethanol, 50% for aldehydes and 100% for methanol.

The combined emissions from these scrubbers vent out one stack. Emissions from this source have been based on design specifications and are presented in *Table 7.4*.

Table 7.4 Predicted Emissions – Fermentation & Process Vent Scrubbers

Contaminant	Predicted Emission (kg/hr)	Predicted Emissions (g/s)
Ethanol	2.85	0.79
Aldehydes <sup>2</sup>	0.91	0.25
Methanol	0	0

<sup>1.</sup> Carbon dioxide has not been assessed as there is no NSW DEC assessment criterion for this pollutant.

### 7.5 DDGS DRYER EMISSIONS

A LNG fired dryer will be used to reduce the moisture content of half of the WDGS, prior to being transported off site as DDGS. Emissions from this source will be directed through a 13.7m stack. Emissions of VOCs and carbon monoxide will be controlled by a thermal oxidiser, while particulate emissions will be controlled by a wet electrostatic precipitator. It has been assumed for modelling purposes that all of the VOCs being emitted as a result of the drying of WDGS are ethanol. Emissions from this source have been provided by AEL and are based on vendor specifications, engineering estimates and United States National Department of Environmental Quality (NDEQ) recommended emission factors. The major emissions associated with the dryer are presented in *Table 7.5*.

Table 7.5 Predicted Emissions - DDGS Dryer

Contaminant	Predicted Emission (kg/year)	Predicted Emission (g/sec)
Acetaldehyde	31.8	0.001
Benzene	0.34	0.000011
Carbon Monoxide	6.8	0.00022
Ethanol	10954.3	0.35
Formaldehyde	32.2	0.001
Hexane	294.43	0.0093
Methanol	6.35	0.0002
Nitrogen Dioxide	3337.6	0.11
$PM_{10}$	7207.6	0.23
Sulphur Dioxide	49.9	0.0016
TSP	7207.6	0.23

 $<sup>1.\,100\%</sup>$  of the nitrogen oxide emissions are assumed to be nitrogen dioxide.

## 7.6 LOADOUT FLARE

A loadout flare will be installed to control emissions from the loading of ethanol trucks. Emissions from this flare have been estimated using emission factors from the United States AP- 42 Compilation of Air Pollutant Emission Factors, Transportation and Marketing of Petroleum Liquids, 1995 and Section 13.5.2 Industrial Flares, 1995. Data used to estimate emissions was supplied by the vendor. Estimated major emissions are given in *Table 7.6* below.

<sup>2.</sup> It has been assumed for the purposes of modelling that 100% of the aldehyde emissions are acetaldehyde.

Table 7.6 Estimated Emissions – Loadout Flare

Contaminant	Predicted Emission (kg/year)	Predicted Emission (g/sec)
Acetaldehyde	0.064	2.03 x 10 <sup>-6</sup>
Benzene	0.55	$1.74 \times 10^{-5}$
Carbon monoxide	10015	0.32
Ethanol	197	0.0062
Hexane	157.4	0.005
Methanol	0.096	$3.04 \times 10^{-6}$
Nitrogen dioxide	5010	0.16
Toluene	12.27	$3.9 \times 10^{-4}$

1. 100% of the nitrogen oxide emissions are assumed to be nitrogen dioxide.

The dispersion model does not characterise flaring due to the increased buoyancy effects of the plume. Therefore, the loadout flare plume rise has been manually calculated, so that the emission plume can be accurately represented in the dispersion model. The methodology used to calculate plume rise includes:

- calculation of the total heat release from the flare based on gas composition and flowrate;
- assumed radiation losses of 25%;
- calculation of the flame height and the buoyancy factor of the combusted gas plume from the flare stack; and
- modelling of the flare as a point source with the same buoyancy.

The calculated plume centreline height of the loadout flare is 17m. Therefore, at this height, it is anticipated that the plume has no velocity and is subject to dispersal by meteorological conditions. The flare source has been represented as a stack 17m high with a velocity of 0.1 metres per second.

### 7.7 FUGITIVE EMISSIONS

Storage and Handling of Wet Distillers Grain

Fugitive emissions of ethanol and other VOC's will occur from the storage and handling of WDGS. WDGS will only be stored for a short period of time before being dried to DDGS, or transported offsite as livestock feed.

Emissions have been estimated using the NDEQ emission factors developed for a similar facility in the USA, and are presented in *Table 7.7*.

Table 7.7 Emissions - Wet Distillers Grain and Solubles Storage and Handling

Contaminant	<b>Emission Factor</b>	Quantity	Emissions	
	kg/tonne of WDGS	tonne of WDGS/year	kg/year	g/sec
Acetaldehyde	5.545 x 10 <sup>-5</sup>	288300	15.9	0.0005
Formaldehyde	$1.102 \times 10^{-4}$	288300	31.8	0.001
Methanol	2.216 x 10-5	288300	6.4	0.0002
Ethanol	$4.150 \times 10^{-3}$	288300	1,196	0.038

## Fugitive Emissions from Tanks

Fugitive emissions from tanks can be categorised into working and standing losses. Working losses are defined as the combined loss from the filling and emptying of the tank. As the liquid level increases, the pressure inside the tank increases and vapours are expelled from the tank. Losses during emptying occur when air drawn into the tank becomes saturated with organic vapour and expands. Standing losses occur through the expulsion of vapour from a tank due to the vapour expansion and contraction as a result of changes in temperature and barometric pressure (NPI, 2004).

There will be four storage tanks at the Oaklands facility. These will be:

- one storage tank for the gasoline denaturant;
- one tank for ethanol product that is out of specification; and
- two ethanol product storage tanks.

All of these tanks will be vertical, fixed roof tanks. Both standing and working emissions from each tank have been estimated using the *TANKS 4.09b* program. This program was developed by the American Petroleum Institute to estimate air emissions from organic liquids in storage tanks. Information about the tank (dimensions, design, and paint condition), the liquid contents (chemical composition) and the location of the tank (nearest town or city) are entered to generate an estimation of air emissions for that substance or mixture of substances. The fugitive emissions from tanks have been modelled as volume sources. Estimated emissions from these sources are given below in *Table 7.8*.

Table 7.8 Fugitive Ethanol Losses from Tanks

Tank	Standing Losses (kg/year)	Working Losses (kg/year)	Total Losses (kg/year)	Total Losses (g/sec)
Off Spec Ethanol Storage Tank	1472.11	640.72	2112.83	0.067
Ethanol Storage Tanks	11247.74	1577.98	12825.72	0.407

<sup>1.</sup> Emissions have been estimated using the TANKS 4.09 program.

Emissions from the gasoline storage tank have not been assessed as emissions from this single tank source are not considered to be significant.

### 7.8 ODOUR EMISSIONS

VOC emissions from the fermentation process, storage and handling of WDGS and the storage and disposal of wastewater have the potential to be odorous.

It is assumed that there will be negligible odour emissions from the DDGS stack. Previous experience at similar plants in the US, and indeed the use of incinerators or thermal oxidisers in Australia (in use at many different facilities), indicates that a VOC destruction efficiency of 98% is likely to be achieved.

### 7.8.1 Fermentation Process

Limited data is available as to odour emissions from ethanol plants. An odour emission rate for a CO<sub>2</sub> scrubber has been derived from values used by Holmes Air Sciences (2006) for an air quality assessment of a proposed 300Ml ethanol plant in Coleambally, NSW. The data used in this assessment was estimated from an ethanol plant in the United States which used grain as a feedstock. It has been assumed that the odour emission rate is proportional to plant throughput, therefore the odour emission rate used by Holmes has been adjusted to reflect the smaller throughout of the proposed Oaklands facility.

The predicted odour emission rates must be adjusted to accurately simulate atmospheric dispersion of odours and the instantaneous perception of odours by the human nose. Peak-to-mean ratios vary with stability class and are applied to odour emission rates to ensure that a peak concentration of odour is able to be predicted from dispersion modelling results. These peak-to-mean ratios are presented in *Table 7.9*.

Table 7.9 Peak to Mean Ratios

Source Type	Pasquill-Gifford stability class	Near-field (P/M60)	Far field (P/M60)
Area	A,B, C, D	2.5	2.3
	E, F	2.3	1.9
Line	A-F	6	6
Surface wake free point	A, B, C	12	4
	D,E,F	25	7
Tall wake free point	A, B,C	17	3
_	D,E,F	35	6
Wake affected point	A-F	2.3	2.3
Volume	A-F	2.3	2.3

<sup>1.</sup> Source: Technical Framework for Odour NSW DEC, Table 6.1, 2006a

For the fermentation scrubber source, the ratio for a wake affected point has been used, with far field factors. Far field factors have been used as all receptors are located outside the near field zone, which is 'typically 10 times the largest source dimension, either height or width' (NSW DEC, 2006a). The near field zone can be identified as approximately 270m from the location of the fermentation scrubber.

Predicted odour emissions from the fermentation scrubber are presented in *Table 7.10*.

Table 7.10 Predicted Odour Emissions - Fermentation Scrubber

Stability Class Actual Odour Emission PM I		PM Ratio (far field)	<b>Emission Rate</b>
	Rate (ou.m³/s)		(ou.m <sup>3</sup> /s)
A-F	2977	2.3	6846

## 7.8.2 Storage and Handling of WDGS

Fugitive emissions of odour have the potential to occur from the storage and handling of WDGS. Due to the short shelf life of the product (less than a week), WDGS will be transported off-site at least weekly. On-site storage of WDGS will be provided by a concrete bunker within an enclosed shed before being either loaded via a pump and piping to trucks for transport offsite as livestock feed, or to the drier for drying to DDGS. Due to enclosure of the wet product and the limited storage time, it is not expected that WDGS will be a major source of odour.

### 7.8.3 Wastewater Treatment

A secondary anaerobic digestion treatment system will be included within the plant to facilitate reuse of the majority of wastewater within the production process. This treatment system will be fully enclosed. The treatment process will include filtration to remove solids from the waste stream, softening of the water using a zeolite softener and demineralisation.

The evaporator and distillation condensate from the ethanol plant is being reprocessed in the secondary treatment plant which incorporates an anaerobic treatment step to reduce BOD significantly. The wastewater that is not reused in the process will be stored in an effluent dam on the site. The predicted biological oxygen demand (BOD) levels of this wastewater are 33mg/L.

The effluent dam will have a capacity of approximately 40Ml and surface dimensions of approximately 200m x 200m. The inflow to the pond is estimated to be approximately 1.15Ml/day, with a balance storage of approximately 35 days.

It is anticipated that given the quality of the water being discharged to the effluent dam (following wastewater secondary anaerobic digestion treatment) with a low BOD, and the proposed size and retention time of the effluent dam, odour impacts from this source would not be expected.

The wastewater ponds will have the capacity to be fitted with aerators if wastewater monitoring indicates that the expected BOD levels are not able to be maintained. The use of aerators represents an additional mitigation measure to ensure that there are no adverse impacts at sensitive receptors.

### DISPERSION MODELLING ASSESSMENT

#### 8.1 MODELLING METHODOLOGY

8

In this assessment the dispersion model AUSPLUME v6.0 has been used to model emissions from the proposed ethanol facility operations.

The AUSPLUME model is described in Environment Protection Authority of Victoria Publication No. 264 of 1986 "The AUSPLUME Gaussian Plume Dispersion Model". AUSPLUME's mathematical basis was derived from a modified version of the US Environmental Protection Agency ISC model. It is described in the Victorian EPA "State Environment Protection Policy (Air Quality Management)".

The NSW DEC approve this model in their guidance document "Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW", 2005.

The AUSPLUME configuration files employed for the modelling have been provided with this report in electronic format.

### 8.2 MODELLING PARAMETERS

## 8.2.1 Roughness Height

The surface roughness of the area over which the plume is dispersing will affect the surface-generated turbulence and hence the vertical and, to a lesser extent, the horizontal dimensions of the plume.

Surface roughness is characterised by the term 'roughness height' and varies from zero metres over ice to one metre in pine forests or cities. The roughness height selected for the purpose of the modelling is that of rolling rural. This parameter was selected based on the fact that the proposed facility is located in an area of predominantly agricultural land. AUSPLUME allows the user to simulate this by the choice of a roughness height of 0.4m.

## 8.2.2 Meteorological Data

Two meteorological files have been used to model all pollutants in this assessment. They are:

- site representative data from Deniliquin, NSW; and
- worst case meteorological data.

A meteorological data file suitable for modelling using AUSPLUME was complied by PDS Consultancy using data from the Automatic Weather Station (AWS) at Deniliquin. This town is located approximately 110km west of Oaklands and is considered representative of the meteorological conditions in the Oaklands area due to similar terrain and land uses. A further discussion of local meteorology is presented in *Section 5.1*.

Due to the distance between the site and the Deniliquin AWS, modelling has also been undertaken using a worst case meteorological file prepared by EPA Victoria. This file includes worst case meteorological conditions for the dispersion of pollutants.

### 8.2.3 Terrain

The terrain of the local area is flat to slightly undulating. Accordingly, it is not considered that terrain will influence the dispersion of pollutants from the site, and as such, terrain effects have not been included in the model. In addition, AUSPLUME cannot account for terrain effects from area or volume sources.

## 8.2.4 Wind Profile Exponents

Irwin Rural wind profile exponents were utilised in the modelling. This profile is for rural regions such as Oaklands.

## 8.2.5 *Model Receptors*

A Cartesian grid has been set-up with the southwest corner positioned at 422544E, 6062971N and grid receptors at regularly spaced intervals of 100m, covering an area of 6km by 6km.

The discrete receptors have been chosen to represent nearby potential residences, site boundaries and other sensitive areas (Oaklands Central School and a recreational sporting oval). A detailed list of discrete receptors is presented in *Table 8.1* and the locations of these receptors are shown in *Annex A, Figure 2*.

Table 8.1 Sensitive Receptor Locations

Receptor Number	Description	Location (AMG coordinates)		
1	Residence – east of Daysdale St	425009, 6066718		
2	Residence - west of Daysdale St (unoccupied)	425642, 6066696		
3	Residence - east side of Rockliffs Rd (unoccupied)	427286, 6065819		
4	Residence - Saffron-Oaklands Rd	426447, 6064311		
5	Residence- Nixon St	424586, 6065336		
6	Oaklands Central School - Coreen St	424691, 6065224		
7	Recreation facility - Thompson St	424896, 6065166		
8	Residence- west side of Rockliffs Rd	427809, 6065554		
9	Residence - northeast of Daysdale St (unoccupied)	426258, 6068191		
10	Residence - Maxwelton Rd (unoccupied)	422589, 6067912		
11	Northern Site Boundary	425922, 6066381		
12	Eastern Site Boundary	426066, 6065930		
13	Southern Site Boundary	425446, 6065016		
14	Western Boundary - Point 1	425944, 6065666		
15	Western Boundary - Point 2	425075, 6066507		
16	Western Boundary – Point 3	425409, 6066154		

1. AMG - Australian Map Grid coordinates

## 8.2.6 Background Concentrations

The major land use surrounding the site is rural. A discussion of background concentrations has been given in *Section 5.5*.

## 8.2.7 Building Wakes

Building wake effects are flow lines that cause a plume to be forced downwards much sooner than it would have had the building not been there. This can result in higher ground level concentrations on the leeward side of obstructions. AUSPLUME contains algorithms to determine the effects of building downwash on plume dispersion. For this assessment the PRIME algorithm was selected.

The position and dimensions of all structures in the vicinity of emission sources that may affect the plume dispersion have been included in the model. The AUSPLUME Building Profile Input Program (BPIP) was used to input the height and coordinates of all relevant buildings.

### 8.3 MODEL INPUT DATA

The following information was collected for the point source discharge points:

- location coordinates;
- exhaust gas velocity and temperature;
- source diameter;
- discharge height above ground level;
- dimensions of any buildings in the vicinity of the source; and
- contaminant emission rates.

The following information was collected for area and volume sources;

- source location coordinates;
- source length, width and height; and
- contaminant emission rates.

Table 8.2 to 8.4 provide summaries of the model input data used for this assessment.

Table 8.2 Model Input Data - Point Sources

Contaminant	Point Source	Height (m)	Diameter (m)	Velocity	Temp (°C)	Source Coordinates	Source Coordinates	<b>Emission Rate</b>
				(m/s)		1 (AMG)	2 (AMG)	(g/s)
Benzene	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.000013
Carbon monoxide	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.51
Formaldehyde	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.00044
Hexane	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.11
Nitrogen dioxide	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.82
PAH	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.0000041
$PM_{10}$	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.044
Sulphur dioxide	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.0031
Toluene	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.00002
TSP	Boiler	13.72	1.22	20.21	193	425554, 6065550	425566, 6065548	0.044
Acetaldehyde	Fermentation/ Process Scrubber	26.82	0.61	1	32	425646, 6065585	N/A	0.25
Ethanol	Fermentation/ Process Scrubber	26.82	0.61	1	32	425646, 6065585	N/A	0.79
Odour	Fermentation/ Process Scrubber	26.82	0.61	1	32	425646, 6065585	N/A	$6846^{1}$
$PM_{10}$	Cooling Towers	9.14	9.3	0.95	32	425591, 6065519	425603, 6065517	0.079
TSP	Cooling Towers	9.14	9.3	0.95	32	425591, 6065519	425603, 6065517	0.079
$PM_{10}$	Grain Handling Dust Collectors	9.14	1.07	25.34	21	425518, 6065624	N/A	0.13
TSP	Grain Handling Dust Collectors	9.14	1.07	25.34	21	425518, 6065624	N/A	0.26
$PM_{10}$	DDGS Loadout Dust Collectors	12.19	0.41	18.19	32	425527, 6065638	N/A	0.013
TSP	DDGS Loadout Dust Collectors	12.19	0.41	18.19	32	425527, 6065638	N/A	0.027
$PM_{10}$	Milling Dust Collectors	12.19	0.56	17.32	21	425527, 6065626	425530, 6065625	0.049
TSP	Milling Dust Collectors	12.19	0.56	17.32	21	425527, 6065626	425530, 6065625	0.097
Acetaldehyde	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.001
Benzene	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.000011
Carbon Monoxide	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.00022
Ethanol	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.35
Formaldehyde	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.001

Contaminant	Point Source	Height (m)	Diameter (m)	Velocity	Temp (°C)	Source Coordinates	Source Coordinates	<b>Emission Rate</b>
				(m/s)		1 (AMG)	2 (AMG)	(g/s)
Hexane	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.0093
Methanol	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.0002
Nitrogen Dioxide	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.11
$PM_{10}$	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.23
Sulphur Dioxide	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.0016
TSP	DDGS Dryer	13.72	1.22	10	99	425580, 6065686	N/A	0.23
Acetaldehyde	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	2.03 x 10 <sup>-6</sup>
Benzene	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	$1.74 \times 10^{-5}$
Carbon Monoxide	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	0.32
Ethanol	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	0.0062
Hexane	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	0.005
Methanol	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	$3.04 \times 10^{-6}$
Nitrogen Dioxide	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	0.16
Toluene	Loadout Flare	17	10	0.1	100	425541, 6065770	N/A	0.00039

- 1. Odour emissions in OUV/s
- 2. N/A Not Applicable
- 3. Source 2 applies only to plant equipment where there are multiple emission points.
- 4. 100% of the nitrogen oxide emissions are assumed to be nitrogen dioxide.

Table 8.3 Model Input Data - Area Sources

Contaminant	Area Source	X length (m)	Y length (m)	Height (m)	Initial Vertical Spread (m)	Source Coordinates (SW corner)	Emission Rate (g/s/m²)
Ethanol	Wet Cake Storage	35	23	0	3	425555, 6065697	4.67 x 10-5
Acetaldehyde	Wet Cake Storage	35	23	0	3	425555, 6065697	6.25 x 10 <sup>-7</sup>
Formaldehyde	Wet Cake Storage	35	23	0	3	425555, 6065697	$1.24 \times 10^{-6}$
Methanol	Wet Cake Storage	35	23	0	3	425555, 6065697	2.49 x 10 <sup>-7</sup>

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

Table 8.4 Model Input Data - Volume Sources

Contaminant	Volume Source	Initial Vertical	Initial Horizontal	Height (m)	Source Coordinates	<b>Emission Rate</b>
		Spread (m)	Spread (m)		(SW corner)	(g/s)
Ethanol	Ethanol Storage Tank 1	4.95	3.43	19.81	425575, 6065766	0.41
Ethanol	Ethanol Storage Tank 2	4.95	3.43	19.81	425579, 6065787	0.41
Ethanol	Off Spec Ethanol Storage Tank	2.21	2.67	8.84	425591, 6065774	0.067
1. Source: Tanks 4.09b						

# 9 PREDICTION OF AIR QUALITY IMPACTS

The dispersion model AUSPLUME has been used to assess air quality impacts from the proposed ethanol facility on nearby sensitive receptors. The results of this assessment are presented in *Tables 9.1* to *9.4*. Dispersion modelling has also been undertaken with "worst-case" meteorology. The results of this assessment are presented in *Tables 9.5* to *9.8*.

The POEO standards of concentration have been calculated based on the plant design. These concentration limits are presented in *Table 9.9*.

Concentration contours are presented in *Annex D*. Due to the large number of pollutants and averaging times, a selection of concentration contours has been presented to provide an illustration of the dispersal of pollutants from the emission sources.

Table 9.1 Predicted Ground Level Concentrations - 100th percentile, Deniliquin 2004

Receptor	Predicted Ground Level Concentration (μg/m³)											
	Ca	rbon Mono	xide	Nitroge	n Dioxide	PI	M10		Sulphu	r Dioxide		TSP
	15 min	1 hr	8 hr	1 hr	Annual	24 hr	Annual	10 min	1 hour	24 hr	Annual	Annual
1	19.0	16.5	5.01	23.7	0.37	2.59	0.18	0.11	0.095	0.016	0.0016	0.24
2	19.3	15.4	6.61	20.9	0.66	2.76	0.33	0.12	0.092	0.017	0.0027	0.43
3	16.7	15.0	4.07	20.8	0.50	1.74	0.21	0.13	0.11	0.011	0.0020	0.28
4	11.3	9.09	4.78	11.2	0.26	2.08	0.12	0.063	0.051	0.012	0.0011	0.16
5	12.8	12.4	5.96	19.1	0.38	4.29	0.31	0.11	0.10	0.017	0.0016	0.48
6	11.8	11.0	6.33	17.4	0.45	7.50	0.37	0.09	0.082	0.025	0.0019	0.57
7	11.5	10.4	6.26	16.7	0.50	4.15	0.39	0.082	0.076	0.04	0.0022	0.59
8	12.9	10.8	3.63	14.9	0.34	1.38	0.15	0.091	0.070	0.0097	0.0014	0.20
9	11.8	9.05	3.07	11.0	0.28	1.23	0.11	0.068	0.049	0.0073	0.0012	0.14
10	9.54	7.57	3.04	10.2	0.081	0.93	0.038	0.058	0.042	0.0062	0.00032	0.055
11	20.2	18.6	8.43	26.5	1.24	4.31	0.60	0.15	0.12	0.032	0.0050	0.81
12	29.3	27.4	11.4	44.2	1.93	4.33	0.91	0.18	0.17	0.039	0.0079	1.21
13	17.5	14.4	6.76	20.0	0.49	4.65	0.38	0.12	0.094	0.037	0.0022	0.54
14	34.2	32.6	17.4	52.4	2.82	8.31	1.56	0.21	0.20	0.073	0.012	2.13
15	17.2	16.2	5.90	24.0	0.42	2.86	0.22	0.12	0.097	0.021	0.0018	0.29
16	33.4	30.3	13.1	44.0	1.17	4.96	0.62	0.19	0.17	0.044	0.0047	0.88
CRITERIA (ug/m³)	100,000	30,000	10,000	246	62	50	30	712	570	228	60	90

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

<sup>2. 100%</sup> of the nitrogen oxide emissions are assumed to be nitrogen dioxide.

Table 9.2 Predicted Ground Level Concentrations- Toxic Air Pollutants, 99.9th Percentile, Deniliquin 2004

Receptor	Predicted ground level concentrations (mg/m³)							
	Benzene	Formaldehyde	n-hexane	PAH				
	1 hour	1 hour	1 hour	1 hour				
1	6.17 x 10 <sup>-7</sup>	$8.70 \times 10^{-5}$	3.93 x 10-4	$7.24 \times 10^{-8}$				
2	6.59 x 10 <sup>-7</sup>	1.33 x 10 <sup>-4</sup>	$3.75 \times 10^{-4}$	6.17 x 10-8				
3	$5.52 \times 10^{-7}$	5.19 x 10 <sup>-5</sup>	$3.75 \times 10^{-4}$	6.76 x 10-8				
4	$4.90 \times 10^{-7}$	4.53 x 10 <sup>-5</sup>	$2.45 \times 10^{-4}$	$3.27 \times 10^{-8}$				
5	$5.76 \times 10^{-7}$	1.16 x 10 <sup>-4</sup>	3.60 x 10 <sup>-4</sup>	6.54 x 10-8				
6	5.41 x 10 <sup>-7</sup>	9.30 x 10 <sup>-5</sup>	3.46 x 10 <sup>-4</sup>	$7.72 \times 10^{-8}$				
7	$5.60 \times 10^{-7}$	1.15 x 10 <sup>-4</sup>	$3.43 \times 10^{-4}$	6.85 x 10 <sup>-8</sup>				
8	$4.27 \times 10^{-7}$	3.77 x 10 <sup>-5</sup>	$2.74 \times 10^{-4}$	5.28 x 10-8				
9	3.65 x 10 <sup>-7</sup>	$3.00 \times 10^{-5}$	$2.27 \times 10^{-4}$	3.95 x 10-8				
10	$3.15 \times 10^{-7}$	2.62 x 10 <sup>-5</sup>	1.98 x 10 <sup>-4</sup>	3.44 x 10 <sup>-8</sup>				
11	6.38 x 10 <sup>-7</sup>	1.32 x 10 <sup>-4</sup>	$4.27 \times 10^{-4}$	9.87 x 10-8				
12	$7.92 \times 10^{-7}$	3.24 x 10 <sup>-4</sup>	$6.40 \times 10^{-4}$	$1.98 \times 10^{-7}$				
13	6.22 x 10 <sup>-7</sup>	$1.74 \times 10^{-4}$	$3.98 \times 10^{-4}$	$6.70 \times 10^{-8}$				
14	8.62 x 10-7	4.31 x 10 <sup>-4</sup>	$7.04 \times 10^{-4}$	$2.23 \times 10^{-7}$				
15	6.81 x 10 <sup>-7</sup>	1.06 x 10 <sup>-4</sup>	4.52 x 10 <sup>-4</sup>	7.93 x 10-8				
16	9.52 x 10 <sup>-7</sup>	2.79 x 10 <sup>-4</sup>	6.46 x 10 <sup>-3</sup>	$1.33 \times 10^{-7}$				
CRITERIA (mg/m³)	0.029	0.02	3.2	0.0004				

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

Table 9.3 Predicted Ground Level Concentrations - Odorous Air Pollutants, 99.9th percentile, Deniliquin 2004

Receptor	Predicted ground level concentrations (mg/m³)						
	Acetaldehyde	Ethanol	Methanol	Toluene			
	1 hour	1 hour	1 hour	1 hour			
1	$3.45 \times 10^{-3}$	0.043	1.96 x 10 <sup>-5</sup>	5.61 x 10-6			
2	$4.59 \times 10^{-3}$	0.062	$3.19 \times 10^{-5}$	8.17 x 10-6			
3	$3.51 \times 10^{-3}$	0.032	1.16 x 10 <sup>-5</sup>	$5.54 \times 10^{-6}$			
4	$4.05 \times 10^{-3}$	0.031	9.90 x 10 <sup>-6</sup>	4.76 x 10 <sup>-6</sup>			
5	$7.85 \times 10^{-3}$	0.049	$2.77 \times 10^{-5}$	$7.50 \times 10^{-6}$			
6	$8.17 \times 10^{-3}$	0.047	2.13 x 10 <sup>-5</sup>	6.88 x 10 <sup>-6</sup>			
7	$6.88 \times 10^{-3}$	0.052	$2.67 \times 10^{-5}$	7.12 x 10 <sup>-6</sup>			
8	$2.69 \times 10^{-3}$	0.022	$7.67 \times 10^{-6}$	3.63 x 10-6			
9	$1.66 \times 10^{-3}$	0.018	6.51 x 10 <sup>-6</sup>	4.01 x 10-6			
10	$1.15 \times 10^{-3}$	0.014	5.13 x 10 <sup>-6</sup>	3.10 x 10 <sup>-6</sup>			
11	N/A	N/A	N/A	N/A			
12	N/A	N/A	N/A	N/A			
13	N/A	N/A	N/A	N/A			
14	N/A	N/A	N/A	N/A			
15	N/A	N/A	N/A	N/A			
16	N/A	N/A	N/A	N/A			
CRITERIA (mg/m3)	0.042	2.1	3.0	0.36			

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

<sup>2.</sup> Odorous pollutants are not assessed at the site boundary (Receptors 11-16)

Table 9.4 Predicted Ground Level Concentrations - Odour, 99.9th percentile, Deniliquin 2004

Receptor	Predicted ground level concentrations (OU)
1	0.093
2	0.12
3	0.096
4	0.11
5	0.21
6	0.22
7	0.19
8	0.173
9	0.045
10	0.031
11	N/A
12	N/A
13	N/A
14	N/A
15	N/A
16	N/A
CRITERIA (OU)	3.0

Odorous pollutants are not assessed at the site boundary (Receptors 11-16)

Table 9.5 Predicted Ground Level Concentrations - 100th percentile, Worst Case, Synthetic Meteorological Data (metsamp)

Receptor	Predicted Ground Level Concentration (μg/m³)											
	Ca	arbon Monox	cide	Nitroge	n Dioxide	PN	M10		Sulphu	r Dioxide		TSP
	15 min	1 hr	8 hr	1 hr	Annual	24 hr	Annual	10 min	1 hour	24 hr	Annual	Annua
1	12.3	11.2	9.78	15.6	0.35	7.82	0.24	0.082	0.074	0.04	0.0016	0.34
2	12.0	11.8	7.97	17.1	0.41	7.86	0.27	0.084	0.077	0.033	0.0017	0.37
3	11.1	8.97	6.15	8.61	0.23	3.84	0.15	0.046	0.047	0.019	0.00096	0.22
4	11.0	8.79	6.55	9.21	0.28	5.54	0.18	0.062	0.052	0.027	0.0012	0.24
5	7.33	6.81	3.94	5.72	0.37	2.16	0.24	0.024	0.023	0.091	0.0014	0.37
6	12.2	11.2	7.11	12.3	0.44	10.7	0.38	0.07	0.07	0.033	0.0019	0.59
7	16.8	15.6	11.3	25.7	0.62	11.8	0.46	0.12	0.11	0.054	0.0026	0.70
8	12.9	11.0	8.00	15.6	0.22	4.99	0.13	0.092	0.071	0.029	0.00089	0.19
9	1.74	2.05	0.94	21.7	0.13	0.73	0.067	0.010	0.081	0.004	0.00053	0.093
10	4.98	5.19	2.31	6.24	0.10	1.30	0.057	0.023	0.029	0.0082	0.0004	0.084
11	15.2	14.2	11.7	16.6	0.53	11.2	0.41	0.13	0.11	0.036	0.0022	0.63
12	10.7	11.8	9.72	22.2	0.78	20.1	0.70	0.15	0.16	0.079	0.0036	1.06
13	6.76	7.32	5.56	8.35	0.59	5.53	0.42	0.042	0.034	0.024	0.0025	0.64
14	8.49	6.86	5.37	10.8	0.98	17.9	1.05	0.15	0.15	0.069	0.0049	1.49
15	1.59	14.2	11.3	20.9	0.44	11.0	0.33	0.12	0.099	0.049	0.002	0.46
16	7.00	6.93	4.84	8.15	0.65	3.37	0.46	0.038	0.037	0.019	0.0028	0.66
CRITERIA (ug/m³)	100,000	30,000	10,000	246	62	50	30	712	570	228	60	90

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

<sup>2. 100%</sup> of the nitrogen oxide emissions are assumed to be nitrogen dioxide.

Table 9.6 Predicted Ground Level Concentrations- Toxic Air Pollutants, 99.9th Percentile, Worst Case, Synthetic Meteorological Data (metsamp)

Receptor	I	Predicted ground level co	ncentrations (mg/m³)	
	Benzene	Formaldehyde	n-hexane	PAH
	1 hour	1 hour	1 hour	1 hour
1	6.85 x 10 <sup>-7</sup>	1.30 x 10 <sup>-4</sup>	4.04 x 10 <sup>-4</sup>	4.58 x 10
2	5.19 x 10 <sup>-7</sup>	$1.27 \times 10^{-4}$	$3.19 \times 10^{-4}$	5.08 x 10
3	5.81 x 10 <sup>-7</sup>	7.32 x 10 <sup>-5</sup>	$3.06 \times 10^{-4}$	2.02 x 10
4	5.86 x 10 <sup>-7</sup>	8.12 x 10 <sup>-5</sup>	$3.10 \times 10^{-4}$	2.52 x 10
5	3.18 x 10 <sup>-7</sup>	4.51 x 10 <sup>-5</sup>	$1.20 \times 10^{-4}$	2.07 x 10-
6	6.95 x 10 <sup>-7</sup>	1.56 x 10 <sup>-4</sup>	3.61 x 10 <sup>-4</sup>	2.32 x 10
7	4.09 x 10 <sup>-7</sup>	8.44 x 10 <sup>-5</sup>	$3.00 \times 10^{-4}$	8.71 x 10
8	5.11 x 10 <sup>-7</sup>	5.52 x 10 <sup>-5</sup>	$3.05 \times 10^{-4}$	5.77 x 10-
9	8.76 x 10 <sup>-8</sup>	7.53 x 10 <sup>-6</sup>	4.36 x 10 <sup>-4</sup>	8.93 x 10
10	1.96 x 10 <sup>-7</sup>	1.72 x 10 <sup>-5</sup>	1.09 x 10 <sup>-4</sup>	1.56 x 10
11	6.10 x 10 <sup>-7</sup>	2.07 x 10 <sup>-4</sup>	3.19 x 10 <sup>-4</sup>	5.51 x 10
12	$7.72 \times 10^{-7}$	3.27 x 10 <sup>-4</sup>	6.23 x 10 <sup>-4</sup>	8.00 x 10
13	3.48 x 10 <sup>-7</sup>	8.40 x 10 <sup>-5</sup>	1.82 x 10 <sup>-4</sup>	3.29 x 10
14	7.91 x 10 <sup>-7</sup>	5.22 x 10 <sup>-4</sup>	6.37 x 10 <sup>-4</sup>	4.31 x 10
15	$7.42 \times 10^{-7}$	1.69 x 10 <sup>-4</sup>	$5.02 \times 10^{-4}$	6.08 x 10
16	$3.28 \times 10^{-7}$	$1.70 \times 10^{-4}$	$1.88 \times 10^{-4}$	2.95 x 10
CRITERIA (mg/m³)	0.029	0.02	3.2	0.0004

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

Table 9.7 Predicted Ground Level Concentrations - Odorous Air Pollutants, 99.9th percentile, Worst Case, Synthetic Meteorological Data (metsamp)

Receptor	Predicted ground level concentrations (mg/m³)							
	Acetaldehyde	Ethanol	Methanol	Toluene				
	1 hour	1 hour	1 hour	1 hour				
1	7.94 x 10 <sup>-3</sup>	0.087	3.11 x 10 <sup>-5</sup>	7.23 x 10 <sup>-6</sup>				
2	$1.10 \times 10^{-2}$	0.089	3.13 x 10 <sup>-5</sup>	6.09 x 10 <sup>-6</sup>				
3	$4.08 \times 10^{-3}$	0.045	$1.70 \times 10^{-5}$	$7.48 \times 10^{-6}$				
4	$6.50 \times 10^{-3}$	0.069	1.91 x 10 <sup>-5</sup>	$7.49 \times 10^{-6}$				
5	$4.26 \times 10^{-3}$	0.046	1.13 x 10 <sup>-5</sup>	6.46 x 10 <sup>-6</sup>				
6	$6.77 \times 10^{-3}$	0.069	$3.72 \times 10^{-5}$	8.99 x 10 <sup>-6</sup>				
7	$1.47 \times 10^{-2}$	0.093	1.83 x 10 <sup>-5</sup>	3.34 x 10 <sup>-6</sup>				
8	$5.43 \times 10^{-3}$	0.039	1.21 x 10 <sup>-5</sup>	4.42 x 10 <sup>-6</sup>				
9	$1.32 \times 10^{-3}$	0.009	$1.84 \times 10^{-6}$	$1.50 \times 10^{-6}$				
10	$1.56 \times 10^{-3}$	0.014	$3.76 \times 10^{-6}$	2.39 x 10-6				
11	N/A	N/A	N/A	N/A				
12	N/A	N/A	N/A	N/A				
13	N/A	N/A	N/A	N/A				
14	N/A	N/A	N/A	N/A				
15	N/A	N/A	N/A	N/A				
16	N/A	N/A	N/A	N/A				
ITERIA (mg/m³)	0.042	2.1	3.0	0.36				

<sup>1.</sup> Scientific notation has been used ie 1.1x10-4 is equivalent to 0.00011.

<sup>2.</sup> Odorous pollutants are not assessed at the site boundary (Receptors 11-16)

Table 9.8 Predicted Ground Level Concentrations - Odour, 99.9th percentile, Worst Case, Synthetic Meteorological Data (metsamp)

Receptor	Predicted ground level concentrations (OU)		
1	0.24		
2	0.31		
3	0.13		
4	0.24		
5	0.11		
6	0.18		
7	0.49		
8	0.16		
9	0.031		
10	0.038		
11	N/A		
12	N/A		
13	N/A		
14	N/A		
15	N/A		
16	N/A		
CRITERIA (OU)	3.0		

<sup>1.</sup> Odorous pollutants are not assessed at the site boundary (Receptors 11-16)

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Table 9.9 POEO Regulation - Standards of Concentration

Pollutant	Source	Emission Rate (g/s)	Emission Concentration -	Emission Concentration -	Regulation Limit
			Actual (mg/m³)	Normal (mg/m³) <sup>5</sup>	
Solid Particles (TSP)	Dust Collector - Grain Handling	0.26	11	15 <sup>1</sup>	50 mg/m <sup>3</sup>
	Dust Collector - DDGS Loadout	0.027	11	$15^{1}$	$50 \text{ mg/m}^3$
	Dust Collector - Milling	0.097	23	$27^{1}$	$50 \text{ mg/m}^3$
	DDGS Dryer	0.23	6.1	222	$50 \text{ mg/m}^3$
	Boiler 1	0.044	1.9	$3.6^{3}$	$50 \text{ mg/m}^3$
	Boiler 2	0.044	1.9	$3.6^{3}$	$50 \text{ mg/m}^3$
Nitrogen Dioxide	Boiler -1	0.82	35	66 <sup>3</sup>	$350 \text{ mg/m}^3$
	Boiler -2	0.82	35	66 <sup>3</sup>	$350 \text{ mg/m}^3$
	DDGS Dryer	0.11	2.8	102	$350 \mathrm{mg/m^3}$
VOCs	Boiler - 1	0.031	1.3	$2.6^{3}$	$40 \text{ mg/m}^3$
	Boiler - 2	0.031	1.3	$2.6^{3}$	$40 \text{ mg/m}^3$
	DDGS Dryer	0.35	9.1	332	$40 \text{ mg/m}^3$
	Fermentation Scrubber	0.85	15	334	$40 \text{ mg/m}^3$
	Process Vent Scrubber	0.19	2.2	$5^{4}$	$40 \text{ mg/m}^3$
Carbon monoxide	Boiler -1	0.51	21	413	$125 \mathrm{mg/m^3}$
	Boiler -2	0.51	21	413	$125 \mathrm{mg/m^3}$
	DDGS Dryer	0.0002	0.057	$0.02^{2}$	$125 \text{ mg/m}^3$

- 1. This has been based on an assumption of 15% moisture (from US EPA AP42 Compilation of Emission Factors Grain Processes and Elevators).
- 2. This has been based on an assumed gas moisture content of 65%.
- 3. This has been based on an assumed gas moisture content of 17% (typical measured gas moisture for boiler emissions)
- 4. This has been based on an assumed gas moisture content of 50% (a typical gas moisture of effluent gas at an ethanol facility Minnesota Pollution Control Agency Environmental Bulletin 2006).
- 5. In all cases gas pressure has been assumed as ambient.

### 10 RESULTS & DISCUSSION

This section summarises the modelling results and conclusions.

## 10.1 SUMMARY OF RESULTS

The air emissions from all emission sources at the Oaklands facility have been assessed, with plume dispersion modelling undertaken in accordance with regulatory requirements to predict ground level concentrations at the site boundary and nearby sensitive landuses.

A summary of dispersion modelling results (predicted ground level concentrations) for the relevant receptors identified as experiencing the highest concentration of each contaminant is presented in *Table 10.1* below.

Table 10.1 Results Summary

Pollutant	Maximum Concentration		Criteria	% of Criteria	
	Normal	<b>Worst Case</b>		Normal	<b>Worst Case</b>
Carbon monoxide -15 mins	34.2	16.8	100,000 μg/m <sup>3</sup>	0.03%	0.02%
Carbon monoxide - 1 hour	32.6	15.6	$30,000  \mu g/m^3$	0.11%	0.05%
Carbon monoxide -8 hours	17.4	11.3	$10,000  \mu g/m^3$	0.17%	0.11%
Nitrogen Dioxide - 1 hour	52.4	25.7	$246 \mu g/m^{3}$	21.30%	10.45%
Nitrogen Dioxide - Annual	2.82	0.98	$62  \mu g/m^3$	4.55%	1.58%
PM10 - 24 hour	8.31	20.1	50 μg/m³	16.62%	40.20%
PM10 - Annual	1.56	1.05	$30  \mu g/m^3$	5.20%	3.50%
Sulphur Dioxide - 10 mins	0.21	0.15	$712  \mu g/m^3$	0.03%	0.02%
Sulphur Dioxide - 1 hour	0.2	0.16	$570  \mu g/m^3$	0.04%	0.03%
Sulphur Dioxide - 24 hour	0.073	0.091	$228 \mu g/m^{3}$	0.03%	0.04%
Sulphur Dioxide - Annual	0.012	0.0049	60 μg/m³	0.02%	0.01%
TSP - Annual	2.13	1.49	90 μg/m³	2.37%	1.66%
Benzene	$9.52 \times 10^{-7}$	7.91 x 10 <sup>-7</sup>	$0.029 \text{ mg/m}^3$	0.00%	0.00%
Formaldehyde	$4.31 \times 10^{-4}$	5.22 x 10-4	$0.02  \text{mg/m}^3$	2.16%	2.61%
n-Hexane	$6.46 \times 10^{-3}$	6.37 x 10-4	$3.2 \text{ mg/m}^3$	0.20%	0.02%
PAH	2.23 x 10 <sup>-7</sup>	8.93 x 10 <sup>-9</sup>	$0.0004 \text{ mg/m}^3$	0.06%	0.00%
Acetaldehyde	$8.17 \times 10^{-3}$	0.0147	$0.042 \text{ mg/m}^3$	19.45%	35.00%
Ethanol	0.062	0.093	$2.1 \text{ mg/m}^3$	2.95%	4.43%
Methanol	$3.19 \times 10^{-5}$	$3.72 \times 10^{-5}$	$3.0 \text{ mg/m}^3$	0.00%	0.00%
Toluene	$8.17 \times 10^{-6}$	8.99 x 10 <sup>-6</sup>	$0.36  \text{mg/m}^3$	0.00%	0.00%
Odour	0.22	0.49	3.0 OU	7.33%	16.33%

<sup>1.</sup> Maximum concentration has been estimated based on dispersion modelling.

### 10.1.1 Toxic Air Pollutants

The predicted 99.9th percentile ground level concentrations for all toxic air pollutants modelled comply with the NSW DEC impact assessment criteria at the site boundary and all nominated sensitive receptors.

The predicted 99.9th percentile ground level concentrations for all toxic air pollutants modelled with worst case meteorology, comply with the NSW DEC impact assessment criteria at the site boundary and all nominated sensitive receptors.

### 10.1.2 Odorous Air Pollutants

The predicted 99.9th percentile ground level concentrations for all individual odorous pollutants modelled comply with the NSW DEC impact assessment criteria at all of the nominated sensitive receptors.

The predicted 99.9th percentile ground level concentrations for all individual odorous pollutants modelled with worst case meteorology, comply with the NSW DEC impact assessment criteria at all nominated sensitive receptors.

### 10.1.3 Odour

Odour modelling has indicated that predicted 99.9th percentile ground level concentrations of odour are below the NSW DEC criteria of 3.0 odour units at sensitive receptors.

The predicted 99.9<sup>th</sup> percentile ground level concentration for odour modelled with worst case meteorology, complies with the NSW DEC impact assessment criteria at all nominated sensitive receptors.

## 10.1.4 Other Pollutants

Dispersion modelling has indicated that predicted ground level concentrations for carbon monoxide, total suspended particulates (TSP), particulate matter less than 10 micron ( $PM_{10}$ ), nitrogen dioxide and sulphur dioxide are below the relevant NSW DEC criteria.

The predicted ground level concentrations for these pollutants modelled with worse case meteorology, comply with the NSW DEC impact assessment criteria at the site boundary and all nominated sensitive receptors.

#### 10.1.5 POEO Regulation - Standards of Concentration

Concentrations of contaminants emitted from the proposed emission points were calculated and all contaminants from all relevant sources were below the POEO Regulation standards of concentration. The standards of concentration have been calculated based on conservative emission estimations, design specifications and assumptions as to stack parameters. These values should be treated as indicative only and actual values will be confirmed by stack testing of the relevant emission points on commissioning. The results of this testing will provide actual values of concentration which will be assessed against the POEO standards of concentration to ensure compliance and set emission limits which can be maintained on an ongoing basis.

#### 10.2 DISCUSSION

#### 10.2.1 Mitigation Measures

AEL propose to install a number of pollution control devices at the Oaklands facility to ensure that emissions to air are minimised as far as possible. These mitigation measures have been incorporated into the dispersion modelling where relevant. A brief outline of the proposed technologies is given below.

#### **Odour Minimisation**

Odour emissions from the process will be minimised by the use of wet scrubbing technology, as discussed below, and by enclosing potential odour sources such as WDGS storage. Regular water quality monitoring of the wastewater stored onsite will take place to ensure that BOD levels are kept at a low level, thus reducing the risk of odorous emissions. If BOD levels are not able to be kept at a low level with the current wastewater treatment, an aerator may be installed in the effluent dam.

The facility will comply with the legislative requirement to not cause or permit the emissions of any offensive odour from the premises (Section 129 of the POEO Act). An odour management plan will be implemented, potentially as part of the Operational Environmental Management Plan to be developed for the facility, and will include a contact number for nearby residents to notify the facility if an offensive odour is detected.

#### **Dust Minimisation**

Dust minimisation measures to be employed at the site include:

- paving all access roads, the car park and heavy vehicle standing area and most exposed surfaces on-site;
- watering paved roads when necessary;
- covering all truck loads to reduce windblown dust and spillage;
- all grain storage piles will be covered by tarpaulin to reduce wind blown dust emissions;
- maintenance of dust extraction and filtration systems at grain unloading areas;
- maintenance of dust extraction and filtration systems at grain storage silos;
   and
- maintenance of fabric filter dust collection systems at grain screening and milling operations and DDGS loadout.

#### Pollution Control Equipment

A number of pollution control systems are proposed at the Oaklands facility to ensure that emissions to air are minimised as far as possible. A brief outline of the proposed technologies is given below.

#### <u>Dust Collectors</u>

Plant design includes the installation of fabric filters to control particulate emissions from grain handling, milling and DDGS loadout. The dust bearing gas is passed through fabric in such a manner that the dust particles are retained on the 'dirty' gas side of the fabric, while the clean air passes through the fabric to the clean gas side, where it is exhausted to atmosphere. A cleaning method such as shaking or pulsing is used to clean the dirty fabric, with the dust cake generally falling into a collection device below the bag, from where it can be removed.

#### Wet Scrubbers

Wet scrubbers will be installed on the fermentation plant to remove carbon dioxide and VOCs emissions from the fermentation process. The basic process of wet scrubbing involves the contacting of a polluted gas stream with a scrubbing liquid. The liquid absorbs the pollutants from the gas stream, thus allowing discharge to the atmosphere of the clean (scrubbed) gas. The scrubbing liquid may be water, a chemical solution, or both.

#### Paved Roads/Watering of exposed surfaces

All haul routes and most exposed surfaces on the site will be paved to reduce the generation of dust from vehicles and wind erosion. Paved roads will be watered when necessary to further reduce dust emissions.

#### Thermal Oxidiser

VOC and CO emissions will be controlled from the DDGS Dryer by the installation of a thermal oxidiser. Thermal oxidisers are a system of fans, heat exchangers and burners that remove pollutants from gaseous waste streams by burning or oxidising them.

#### 10.2.2 Maintenance of Pollution Control Equipment

Regular maintenance of pollution control equipment is critical to ensure the system is functioning at optimal performance and achieving maximum capture/removal efficiencies. For this purpose, it will be necessary to provide sampling points and easy access points to the equipment when it is installed and a full set of operating conditions and parameters recorded at start up, or while the unit is clean.

To ensure this occurs, a maintenance schedule which sets out weekly, monthly and annual checks will be documented and implemented for all pollution control equipment on the site, as part of an *Operational Environmental Management Plan*. These checks should include, but not be limited to:

- visual checks for leaks, damage or corrosion;
- tests to ensure the proper airflow is being maintained in the case of dust collectors;
- checks to ensure the cleaning system is working adequately and the dust collector filter bags are not overloaded; and
- liquid flow tests, pressure and temperature tests for wet scrubbers.

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Annex A

Figures



Site Boundary

Site Location

į	Client:	Agri Energy Lir	nited							
	Project:	Oaklands Ethanol Production Facility								
1.6	Drawing No:	0056132_OA_	AQ_02							
i	Date:	16.02.2007		Drawing Size: A4						
3.5	Drawn By:	ML		Reviewed By: -						
-	Source:	-								
0	Scale:	Refer to Scale	Bar							
7	Λ	0	400	800m						





200Ml Raw Water Dam

2MI Stormwater Dam

40MI Effluent Dam

Irrigation Area

-Water Pump Station and Pipeline

Site Boundary
Internal Access Road

Recreational

Residence - occupied
Residence - unoccupied

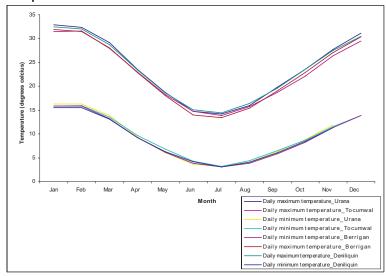
OSite Boundary

# Proposed Site Layout and Sensitive Receptor Locations

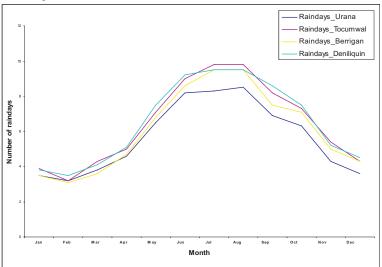
	Client:	Agri Energ	gy Limited						
20	Project:	Oaklands Ethanol Production Facility							
	Drawing No:	0056132_	AQ_GIS02						
	Date:	20.02.2007 Drawing Size: A							
*	Drawn By:	DH		Reviewed By: -					
4	Source:	Aerial: Depart Plant Layout:	ment of Lands NSW PDF DWG No: M06	075-0321					
	Scale:	Refer to S	Scale Bar						
	Λ	0	400	800m					



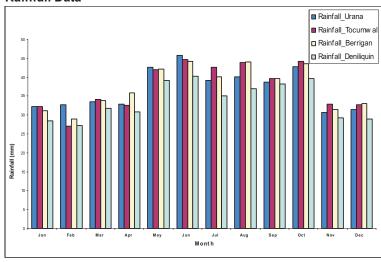
#### **Temperature Data**



#### Rainday Data



#### **Rainfall Data**

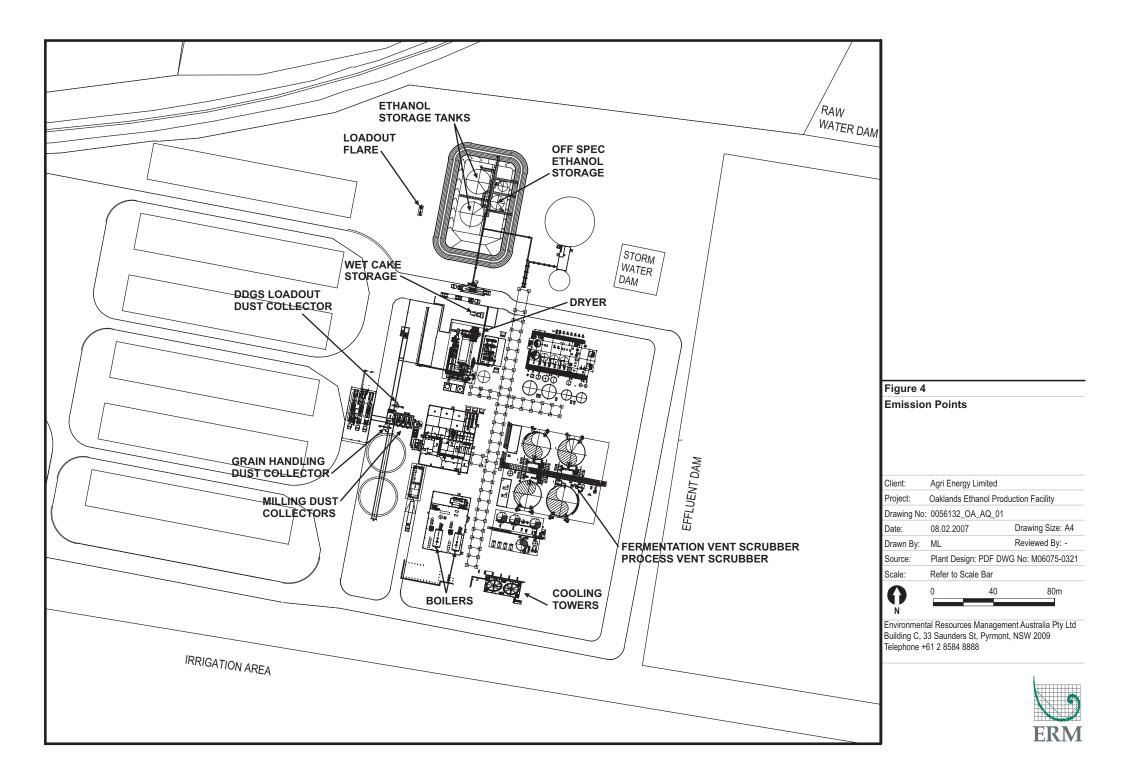


#### Figure 3 Rainfall and Temperature Data - Long Term Climate Averages

Client:	Agri Energy Limited						
Project:	Daklands Ethanol Production Facility						
Drawing No:	0056132_OA_AQ_03						
Date:	19.02.2007	Drawing Size: A4					
Drawn By:	ML	Reviewed By: -					
Source:	-						
Scale:	N/A						







# Annex B

Meteorological File Development



USPLUME

Input Meteorological Data file for Deniliquin (NSW)

Exclusively prepared

for

ERM, Australia.

By

pDs Consultancy

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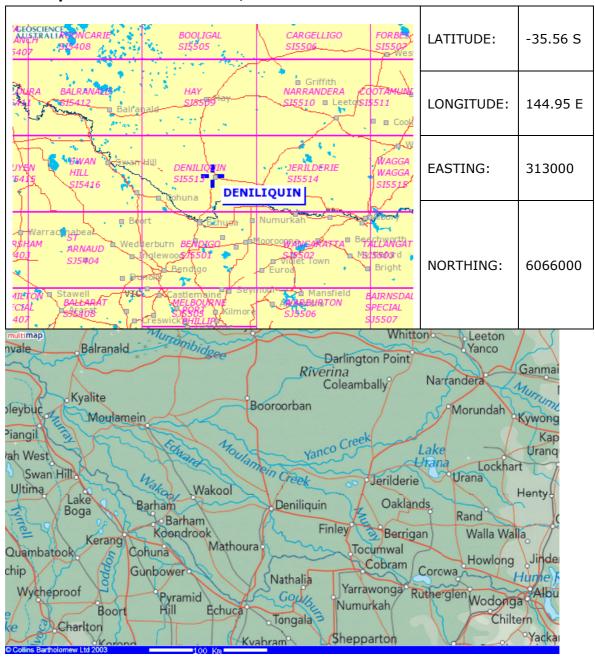




# **AUSPLUME** input Meteorological

# Data File for Deniliquin (NSW)

#### **Deniliquin-New South Wales, Australia**



#### **Data Source**

1. Deniliquin AWS Data- BoM, NSW (Regional Office).



2. WagaWaga Cloud data and Vertical temperature Profiles –National Climate Centre- Bureau of Meteorology, Melbourne.

Land use category: Urban Surface Roughness: **0.3 m** Anemometre Height **:10m** 

# **Input Information**

- Onsite (**Deniliquin**) parameters
  - a. Wind speed (km/h)
  - b. Wind direction
  - c. Ambient Temperature (C)
  - d. Dew point
  - e. Surface Pressure

Wind was measured at 10m (Anemometer Height), surface roughness assumed to be 0.3m

#### Offsite

WagaWaga (NSW)

Cloud cover (Total amount)

- WagaWaga (NSW)
  - a. Vertical temperature profiles; Temperature, Dewpoint (1 profile per day)



#### **DATA Processing**

Mandatory data such as wind direction; speed and ambient temperature were obtained from NSW regional office of the Bureau of Meteorology

#### QA/QC on Raw data

This data set was treated as follows

- Incomplete days removed
- Suspected wind stalls (both wind direction and speed) carefully examined interpolation done following a very conservative way where necessary.
- Wind Speed converted to m/s from km/h (The speed was recorded for the nearest km/h).
- Wind Direction found to be recorded in 10-degree resolution. The last digit of the wind direction has been randomised to meet air quality standard.
- Temperature and Dewpoint were checked for unusual values
- Pressure and cloud amount were checked for unusual values

#### WagaWaga (BoM) Vertical Temperature Profiles

 Gaps in vertical temperature profiles were filled with previous or following day data for the completeness.

99% data recovered for 2004.

#### **Important Notes:**

- 1. Sensitivity of Anemometers (not known) may not be up to air quality standard.
- **2.** Zero wind speed is allowed, which may not be acceptable to older versions of AUSPLUME.



# **Standard Analysis**

# Data Coverage

Summer :89 days

Autumn :92 Winter :92 Spring :91

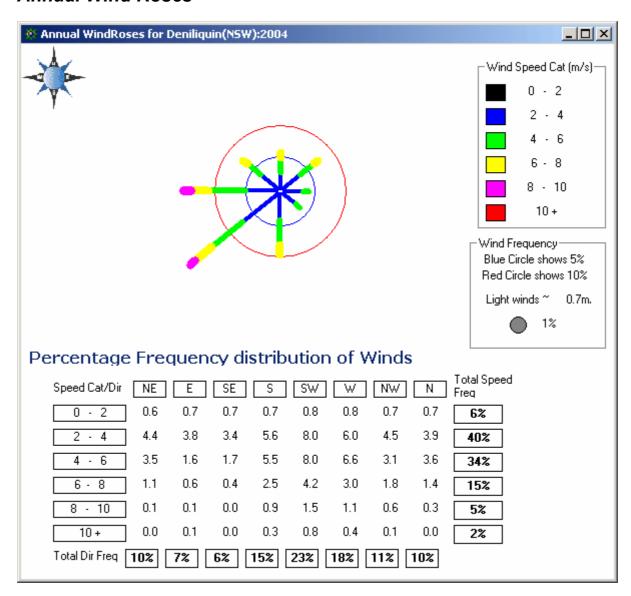
Number of days covered :364 % Coverage :99.5%

All 4 seasons are well represented.

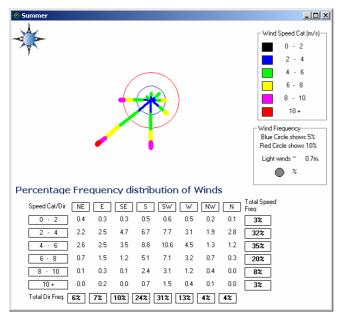
# **Stability Distribution**

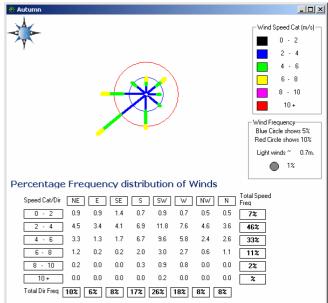
Stability Category	% Distribution	Avg Wind Speed	Avg Temperature	Avg Mixing Height
Α	1	2.1	26.3	1147
В	6	3.5	22.9	1189
С	12	4.4	20.	1264
D	48	5.6	16.2	1263
Е	22	3.6	12.9	799
F	12	2.	10.8	479

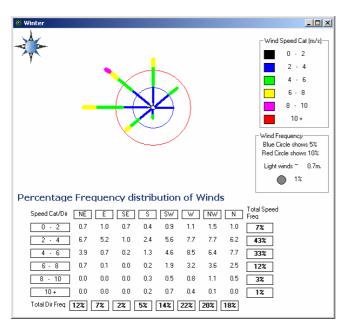
#### **Annual Wind Roses**

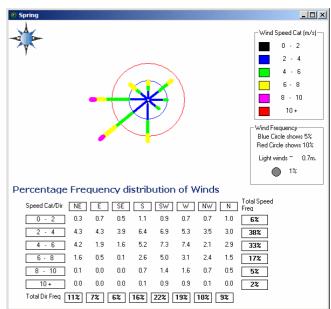


#### **Seasonal Wind Roses**









# **Secondary parameters**

# **Vertical Stability**

Solar Radiation for daytime and Modified Pasquill Stability Class outlined in the reference, Davis and Singh, Jl of Hazardous Materials, 11 was used to determine night-time stability class. Solar radiation was theoretically calculated using off site cloud observations.

Table 1 for daytime and part of Table 2 for night-time were used.

Table 1: Stability Classification for Daytime Using Solar Radiation and Wind Speed

	Solar Radiation (W/m²)									
Wind Speed(m/s)	≥925	≥675	≥175	< 175						
< 2	Α	Α	В	D						
< 3	Α	В	С	D						
< 5	В	В	С	D						
< 6	С	С	D	D						
≥ 6	С	D	D	D						

Note: Calculated Global Exposure (TSR) was used.

**Table 2: Modified Pasquill stability calsses** 

Surface Wind Speed m/s at 10m	Daytime	incoming s	solar radia	Within 1 h before sunset or after sunrise	Night- amour			
	Strong (>600)	Moderate (300- 600)	Slight (<300)	Overcast		0-3	4-7	8
≤ 2	Α	A-B	В	С	D	F	F	D
≤ 3	A-B	В	С	С	D	F	E	D
≤ 5	В	B-C	С	С	D	Е	D	D
≤ 6	С	C-D	D	D	D	D	D	D
> 6	С	D	D	D	D	D	D	D

### Mixing height

#### **Definition:**

The mixing height, the depth of the surface mixed layer is the height of the atmosphere above the ground, which is well mixed due either to mechanical turbulence or convective turbulence. The air layer above this height is stable.

The mixing height was determined by using the methodology of Benkley and Schulman (Journal of Applied Meteorology, Volume 18, 1979,pp 772-780). **WagaWaga** upper air observation containing temperature and moisture profiles were used to determine daytime mixing height.

Surface wind speeds and roughness are used to calculate the depth of the mechanically forced boundary layer during the night time

MixH<sub>m</sub>=0.185\* Ustar/Cterm

Where Ustar=.35\*Usfc/Ln (Ht<sub>anemo</sub>/Z<sub>0)</sub>

Cterm = Coriolis Term =  $2 \Omega \sin(\phi)$ 

Where  $\Omega$  is the angular velocity of the earth  $\phi$  is the latitude

Ht<sub>anemo</sub>= Anemometer Height, Z<sub>0</sub> is the roughness

Height of the convective boundary layer was determined using daytime temperature sounding (Vertical temperature and dewpoint profiles) in between sunrise and sunset. Larger value of the mechanical turbulence or convective turbulence was taken as Mixing height for the daylight hours.



# Statistics of Deniliquin (NSW) input Meteorological data file-2004

Stability	Statistics	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
A	Max of Temp	32.0	41.0						16.0		24.0	33.0		41.0
	Min of Temp	17.0	23.0	19.0	16.0				16.0		16.0	17.0	22.0	16.0
	Average of Temp	26.7	31.9	24.4	20.8				16.0		20.0	22.3	29.6	26.3
	Max of WS	2.5	2.5	2.5	1.4				1.1		2.5	2.5	2.5	2.5
	Min of WS	1.4	1.4	1.1	1.1				1.1		1.1	2.2	1.1	1.1
	Average of WS	2.1	2.2	1.6	1.3				1.1		2.1	2.4	2.2	2.1
	Max of MixH	1569	1828	1336	1323				821		1704	2748	2601	2748
	Min of MixH	409	497	467	664				821		636	676	452	409
	Average of MixH	903	982	926	950				821		1282	1526	1377	1147
В	Max of Temp	39.0	43.0	36.0	26.0	20.0	18.0	13.0	22.0	24.0	30.0	36.0	36.0	43.0
	Min of Temp	17.0	20.0	14.0	15.0	9.0	13.0	5.0	4.0	10.0	13.0	13.0	17.0	4.0
	Average of Temp	26.6	31.1	23.7	21.3	14.5	16.0	10.1	13.2	15.7	21.4	23.9	26.1	22.9
	Max of WS	4.7	4.7	4.7	4.7	4.2	1.4	1.4	4.7	4.7	4.7	4.7	4.7	4.7
	Min of WS	1.4	1.4	1.1	1.4	1.4	1.4	0.6	0.6	0.6	1.4	1.4	1.1	0.6
	Average of WS	3.7	3.7	3.5	3.4	1.6	1.4	1.0	2.8	3.2	3.8	3.8	3.7	3.5
	Max of MixH	2700	2755	2522	1985	1064	786	1917	2124	1865	2566	2861	2691	2861
	Min of MixH	409	497	411	572	349	655	289	508	435	556	426	453	289
	Average of MixH	1251	1267	1126	1060	627	724	700	855	1006	1381	1448	1391	1189
С	Max of Temp	39.0	40.0	38.0	29.0	21.0	19.0	15.0	23.0	25.0	35.0	38.0	37.0	40.0
	Min of Temp	15.0	18.0	14.0	12.0	6.0	5.0	2.0	5.0	6.0	12.0	14.0	15.0	2.0
	Average of Temp	26.5	28.2	26.5	21.2	14.3	11.8	10.3	12.8	15.1	21.8	23.8	24.0	20.0
	Max of WS	10.8	10.3	8.3	5.8	5.8	5.8	5.8	5.8	5.8	8.6	9.2	12.8	12.8
	Min of WS	2.2	2.2	2.2	2.2	1.4	1.4	2.2	2.2	0.6	2.2	2.2	2.2	0.6
	Average of WS	5.3	5.2	4.5	3.8	3.6	3.7	3.6	3.6	3.4	4.8	5.0	5.7	4.4
	Max of MixH	2624	2896	2482	2343	1655	1474	1708	2186	1963	2951	2904	2705	2951
	Min of MixH	480	655	420	442	486	349	453	497	420	546	546	534	349
	Average of MixH	1457	1557	1426	1143	876	857	838	964	1070	1545	1619	1551	1264
D	Max of Temp	39.0	44.0	38.0	34.0	22.0	19.0	17.0	25.0	28.0	37.0	38.0	37.0	44.0
	Min of Temp	8.0	10.0	7.0	3.0	-1.0	0.0	-3.0	-2.0	0.0	5.0	4.0	8.0	-3.0
	Average of Temp	22.4	25.0	21.2	17.3	12.6	9.9	8.9	10.6	12.8	17.8	18.8	20.7	16.2
	Max of WS	12.8	14.4	11.7	12.8	9.2	12.8	14.4	13.3	10.3	13.9	14.4	12.8	14.4
	Min of WS	1.1	1.4	0.6	0.6	1.1	1.1	0.6	1.1	1.1	1.1	1.1	0.6	0.6
	Average of WS	6.1	5.9	5.4	5.3	4.9	5.2	4.9	5.5	5.2	5.9	6.3	6.7	5.6
	Max of MixH	2868	2788	2412	2486	1866	2559	2935	2755	2248	2941	2526	2728	2941
	Min of MixH	393	398	300	218	240	306	158	349	306	333	409	322	158
	Average of MixH	1428	1330	1248	1195	1062	1122	1061	1206	1165	1407	1430	1514	1263
E	Max of Temp	31.0	38.0	31.0	30.0	20.0	17.0	16.0	23.0	25.0	33.0	32.0	29.0	38.0
	Min of Temp	6.0	9.0	8.0	4.0	1.0	2.0	-2.0	0.0	0.0	3.0	2.0	8.0	-2.0
	Average of Temp	17.9	20.5	17.1	13.5	8.5	7.9	6.5	8.8	9.4	13.1	15.9	17.6	12.9
	Max of WS	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.7
	Min of WS	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2

	Average of WS	3.8	3.6	3.7	3.6	3.6	3.5	3.5	3.6	3.6	3.6	3.8	3.9	3.6
	Max of MixH	1348	1271	1151	1146	1102	1119	1075	1108	1102	1168	1162	1217	1348
	Min of MixH	420	437	453	486	442	480	393	393	377	366	437	529	366
	Average of MixH	840	811	805	782	783	774	753	782	794	786	823	868	799
F	Max of Temp	30.0	33.0	33.0	27.0	20.0	16.0	14.0	20.0	24.0	24.0	33.0	32.0	33.0
	Min of Temp	7.0	9.0	7.0	3.0	0.0	0.0	-2.0	-2.0	1.0	2.0	7.0	9.0	-2.0
	Average of Temp	16.4	20.6	15.2	12.4	7.1	6.4	5.3	6.6	8.1	10.8	15.9	17.7	10.8
	Max of WS	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.5
	Min of WS	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	1.1	0.6
	Average of WS	2.1	2.0	2.1	2.1	2.0	2.0	1.9	1.9	1.9	2.0	2.0	2.2	2.0
	Max of MixH	758	895	758	698	742	671	698	666	895	726	769	726	895
	Min of MixH	200	131	158	306	131	200	240	240	218	131	200	306	131
	Average of MixH	513	500	502	498	475	467	460	452	438	473	498	541	479

#### Disclaimer

Compilation of input meteorological data file for AUSPLUME was done under the supervision of qualified and experienced meteorologists. Although all due care has been taken, we cannot give any warranty, nor accept any liability (except that required by law) in relation to the information given, its completeness or its applicability to a particular problem. These data and other material are supplied on the condition that you agree to indemnify us and hold us harmless from and against all liability, losses, claims, proceedings, damages, costs and expenses, directly or indirectly relating to, or arising from the use of or reliance on the data and material which we have supplied.

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PDs Consultancy

mailto:metfile@tpg.com.au



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Annex C

Windroses

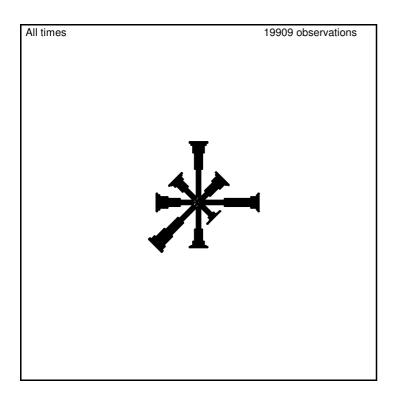
## Wind Roses using data between Oct 1999 and Sep 2006 for

# **Yanco Agricultural Institute**

Site Number 074037 • Locality: Yanco • Opened Aug 1999 • Still Open • Latitude 34°37'20"S • Longitude 146°25'58"E • Elevation 164m

Page 1 of 1





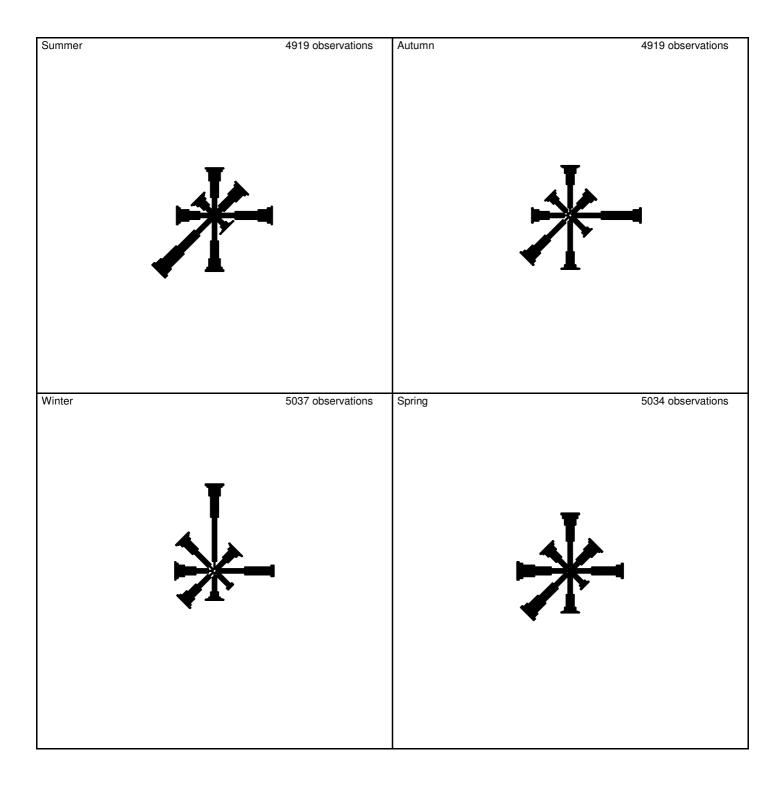
## Wind Roses using data between Oct 1999 and Sep 2006 for

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Site Number 074037 • Locality: Yanco • Opened Aug 1999 • Still Open • Latitude 34°37'20"S • Longitude 146°25'58"E • Elevation 164m

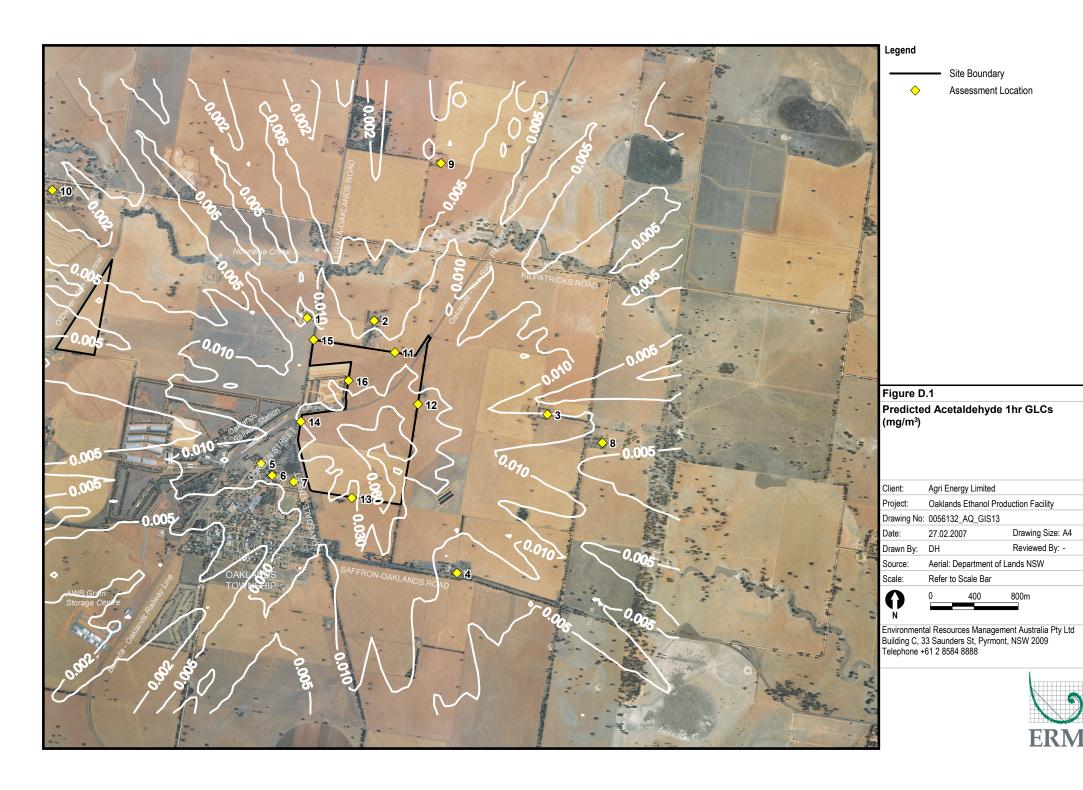
Page 1 of 1





Annex D

**Concentration Contours** 



Drawing Size: A4

Reviewed By: -

800m



Site Boundary



Assessment Location

Predicted Acetaldehyde 1hr (WC) GLCs (mg/m³)

Client:	Agri Energy	y Limited			
Project:	Oaklands Ethanol Production Facility				
Drawing No:	0056132_AQ_GIS14				
Date:	27.02.2007	,	Drawing Size: A4		
Drawn By:	DH		Reviewed By: -		
Source:	Aerial: Department of Lands NSW				
Scale:	Refer to Scale Bar				
$\wedge$	0	400	800m		







Site Boundary



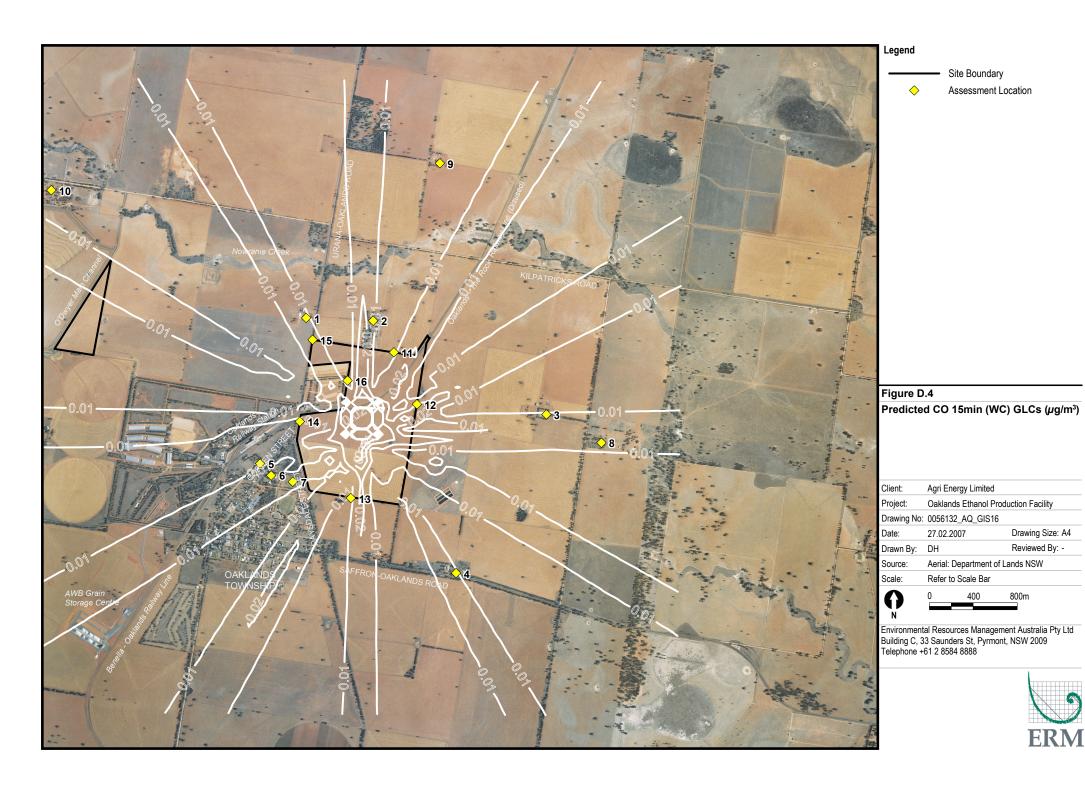
Assessment Location

Predicted CO 15min GLCs (µg/m³)

Client:	Agri Energ	y Limited			
Project:	Oaklands Ethanol Production Facility				
Drawing No:	0056132_A	AQ_GIS15			
Date:	27.02.2007	7	Drawing Size: A4		
Drawn By:	DH		Reviewed By: -		
Source:	Aerial: Department of Lands NSW				
Scale:	Refer to Scale Bar				
	0	400	800m		



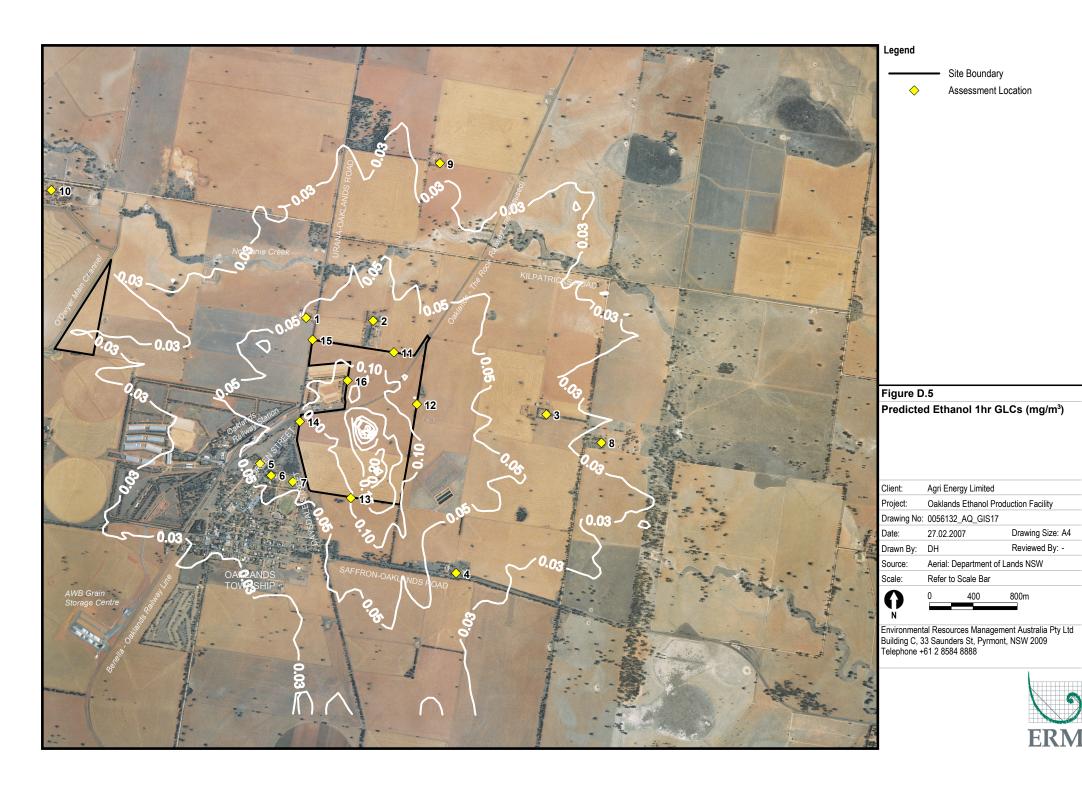




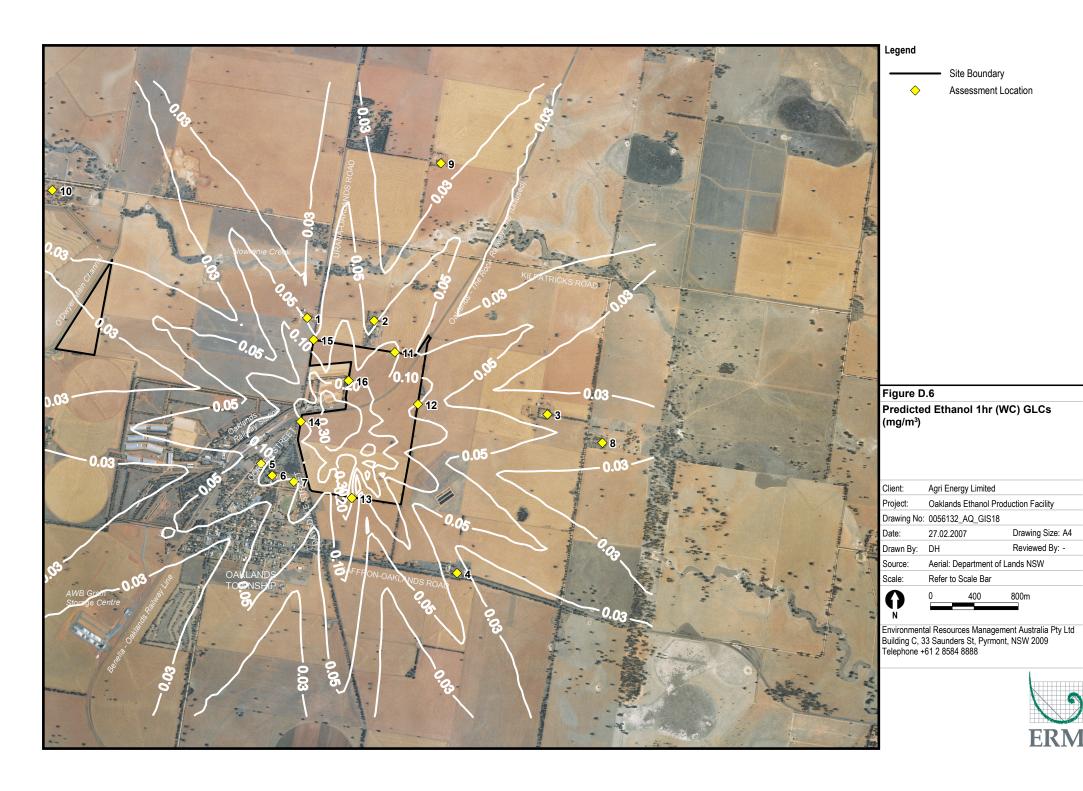
Drawing Size: A4

Reviewed By: -

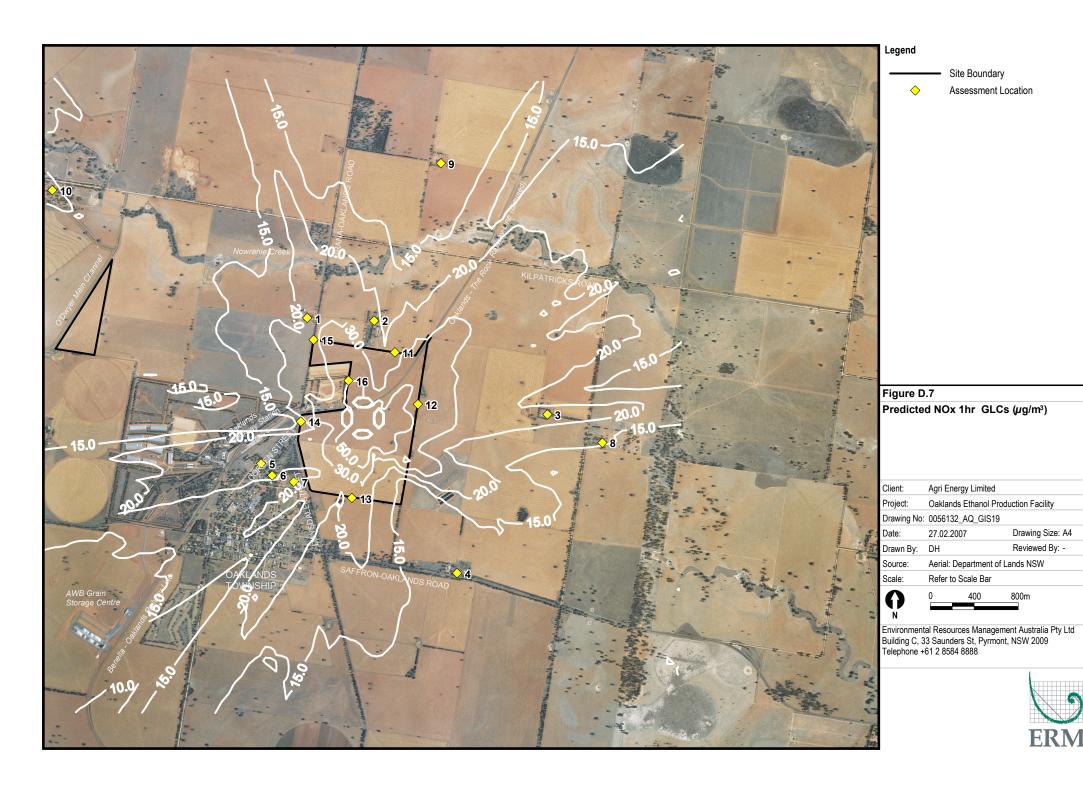
800m



Reviewed By: -



Reviewed By: -



Reviewed By: -





Site Boundary
Assessment Location

Figure D.8
Predicted NOx 1hr (WC) GLCs (µg/m³)

Client:	Agri Energy	Limited		
Project:	Oaklands Ethanol Production Facility			
Drawing No:	0056132_A	Q_GIS20		
Date:	27.02.2007		Drawing Size: A4	
Drawn By:	DH		Reviewed By: -	
Source:	Aerial: Depa	artment of La	ands NSW	
Scale:	Refer to Sca	ale Bar		
0	0	400	800m	



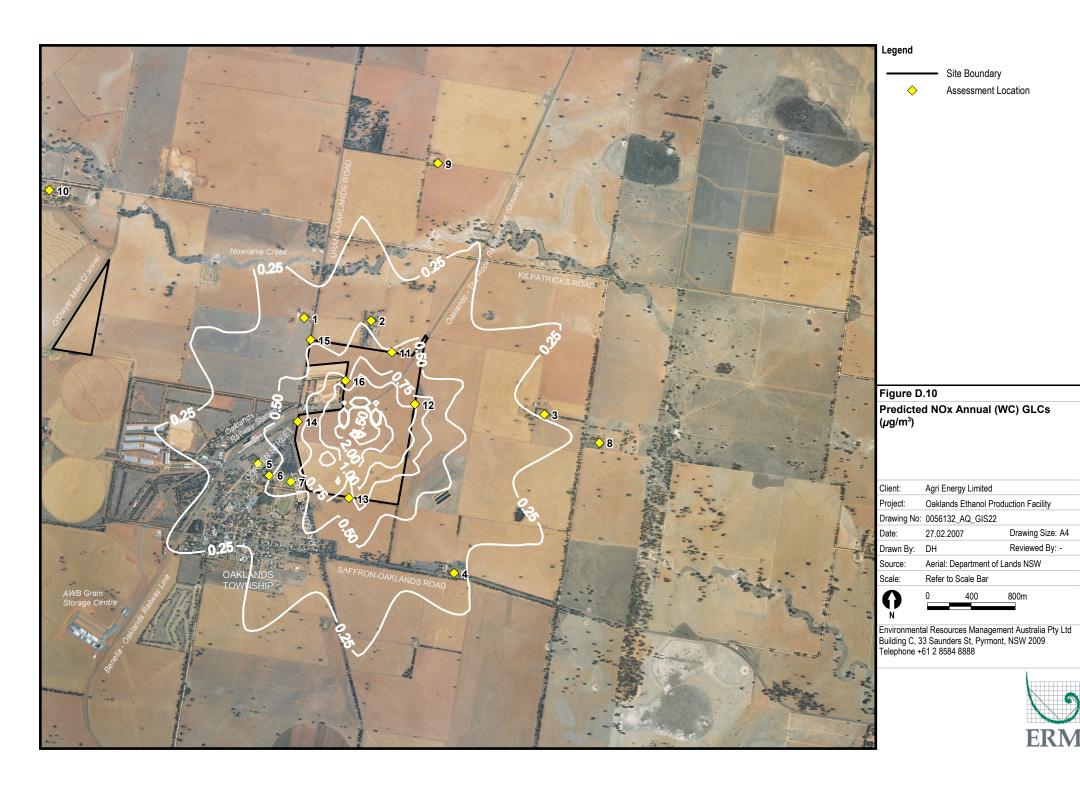


Assessment Location

Figure D.9 Predicted NOx Annual GLCs (µg/m³)

Client:	Agri Energy Limited		
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS21		
Date:	27.02.2007	Drawing Size: A4	
Drawn By:	DH	Reviewed By: -	
Source:	Aerial: Department of La	ands NSW	
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0	0 400	800m	





Reviewed By: -



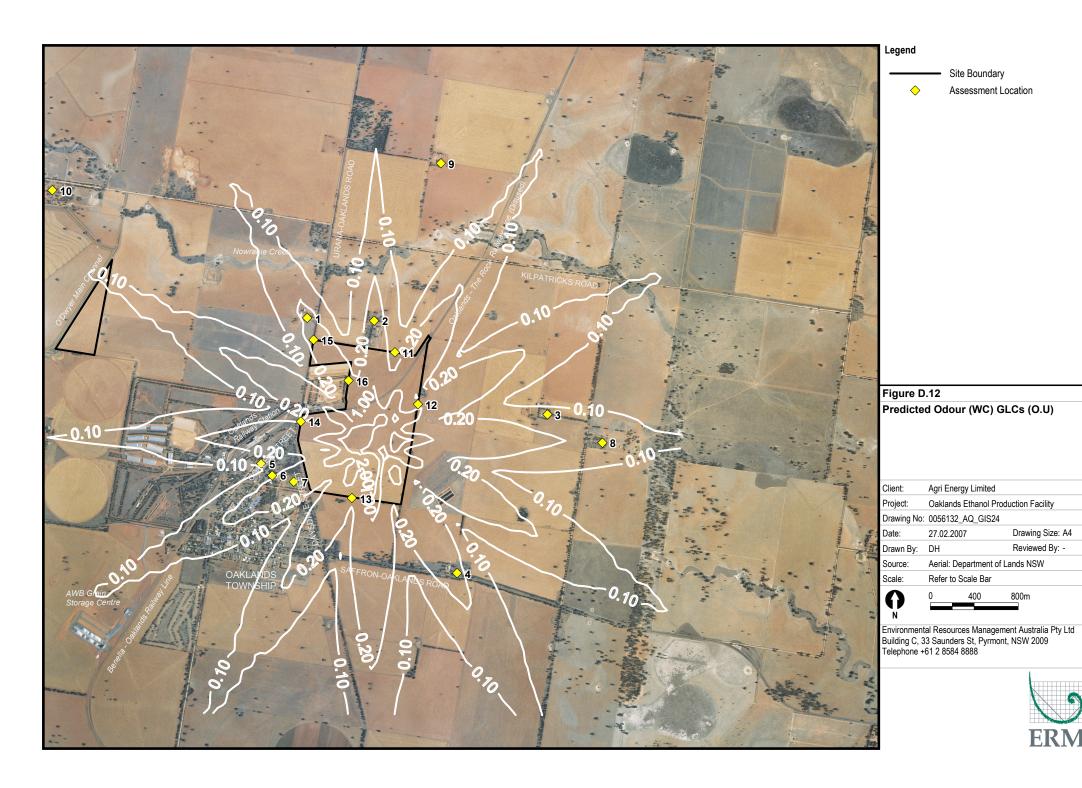


Assessment Location

Figure D.11 Predicted Odour GLCs (O.U)

Client:	Agri Energy	Limited	
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_A	Q_GIS23	
Date:	27.02.2007		Drawing Size: A4
Drawn By:	DH		Reviewed By: -
Source:	Aerial: Depa	rtment of La	ands NSW
Scale:	Refer to Sca	ale Bar	
O	0 4	400	800m





Reviewed By: -





Assessment Location

Figure D.13 Predicted PM10 24hr GLCs (µg/m³)

Client:	Agri Energy Limited			
Project:	Oaklands Ethanol Production Facility			
Drawing No:	0056132_AQ_GIS25			
Date:	27.02.2007 Drawing Size: A <sup>2</sup>			
Drawn By:	DH	Reviewed By: -		
Source:	Aerial: Department of	Lands NSW		
Scale:	Refer to Scale Bar			
Ω	0 400	800m		







Assessment Location

Predicted PM10 24hr (WC) GLCs (μg/m³)

Client:	Agri Energ	y Limited	
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS26		
Date:	27.02.2007	7	Drawing Size: A4
Drawn By:	DH		Reviewed By: -
Source:	Aerial: Department of Lands NSW		
Scale:	Refer to So	cale Bar	
^	0	400	800m







Assessment Location

Figure D.15 Predicted PM10 Annual GLCs (µg/m³)

Client:	Agri Energy Limited		
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS27		
Date:	27.02.2007	Drawing Size: A4	
Drawn By:	DH	Reviewed By: -	
Source:	Aerial: Department of La	inds NSW	
Scale:	Refer to Scale Bar		
Ω	0 400	800m	









Assessment Location

Predicted PM10 Annual (WC) GLCs (μg/m³)

Client:	Agri Energy Limited		
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS28		
Date:	27.02.2007	Drawing Size: A4	
Drawn By:	DH	Reviewed By: -	
Source:	Aerial: Department of La	ands NSW	
Scale:	Refer to Scale Bar		
Ω	0 400	800m	







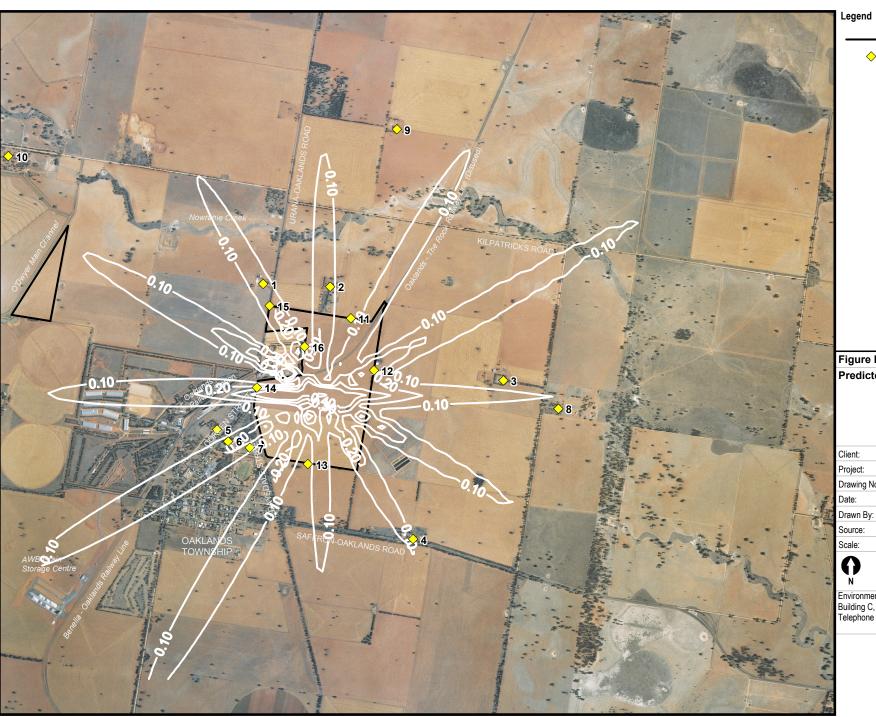
Assessment Location

Figure D.17 Predicted SO2 1hr GLCs (µg/m³)

Client:	Agri Energ	y Limited	
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS29		
Date:	27.02.2007	7	Drawing Size: A4
Drawn By:	DH		Reviewed By: -
Source:	Aerial: Department of Lands NSW		
Scale:	Refer to So	cale Bar	
^	0	400	800m









Assessment Location

Figure D.18 Predicted SO2 1hr (WC) GLCs (µg/m³)

Client:	Agri Energy Limited			
Project:	Oaklands Ethanol Production Facility			
Drawing No:	0056132_AQ_GIS30			
Date:	27.02.2007 Drawing Size: A			
Drawn By:	DH	Reviewed By: -		
Source:	Aerial: Department	of Lands NSW		
Scale:	Refer to Scale Bar			
Ω	0 400	800m		







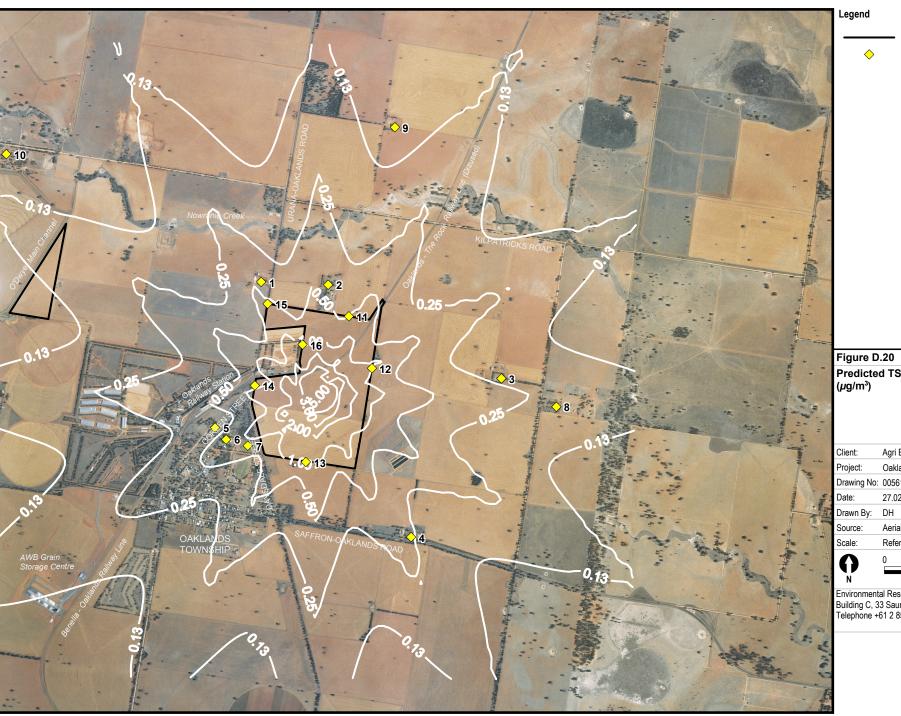
Assessment Location

Figure D.19 Predicted TSP Annual GLCs (µg/m³)

Client:	Agri Energy Lir	mited		
Project:	Oaklands Ethanol Production Facility			
Drawing No:	0056132_AQ_GIS31			
Date:	27.02.2007		Drawing Size: A4	
Drawn By:	DH		Reviewed By: -	
Source:	Aerial: Departn	nent of La	inds NSW	
Scale:	Refer to Scale	Bar		
Ω	0 400	)	800m	









Assessment Location

Predicted TSP Annual (WC) GLCs (μg/m³)

Client:	Agri Energy Limited		
Project:	Oaklands Ethanol Production Facility		
Drawing No:	0056132_AQ_GIS32		
Date:	27.02.2007	Drawing Size: A4	
Drawn By:	DH	Reviewed By: -	
Source:	Aerial: Department of La	inds NSW	
Scale:	Refer to Scale Bar		
	0 400	800m	





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