

## Submission on the Supplement to the draft EIS

### TNG Limited – Darwin Processing Facility

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This submission is made under clause 9 of the Environmental Assessment Administrative Procedures 1984 and section 296 of the *Environment Protection Act 2019*

**Government authority:** Department of Environment, Parks and Water Security–Environment Division – Environmental Authorisations

#### Summary:

- Comments provided by Environmental Authorisations on the draft EIS related to:
  - wastewater discharge to Darwin Harbour via an outfall pipeline; and
  - air emissions.
- The change in project design outlined in the Supplement to replace wastewater disposal to Darwin Harbour with a Water Recycling Plant with no wastewater discharge to the harbour means that a waste discharge licence issued under the *Water Act 1992* would not be required.
- It is recommended that the proponent be required to develop a comprehensive Integrated Water Management Plan for the facility that includes a section surface and ground water monitoring.
- The project will generate listed wastes as specified in Schedule 2 of the *Waste Management and Pollution Control (Administration) Regulations 1998*. These wastes must be:
  - transported from the facility by a person licenced under section 30 of the *Waste Management and Pollution Control Act 1998* (WMPC Act) to transport the listed waste; and
  - disposed at a facility licensed under the WMPC Act to accept the type of waste.
- Disposal of a listed waste at a mine site will require authorisation in accordance with the WMPC Act.
- The proponent should develop a detailed Waste Management Plan.
- Odour management is included when regulating air emissions under provisions of the *Environment Protection Act 2019*.
- It is recommended that the proponent address the findings of the Air Quality Assessment Review conducted by SLR Consulting Pty Ltd.
- The third-party review does not appear to have addressed the NT EPA information request for recommendations for an air emissions monitoring program or contingency options.

Environmental impact assessment under the Environment Protection Act 2019

Section of Supplement	Theme or issue	Comment
Main report – section 2.3.4 Water Recycling Plant	Marine Environmental Quality  Regulation under the <i>Water Act 1992</i>	The change in project design outlined in the Supplement to replace wastewater disposal to Darwin Harbour with a Water Recycling Plant with no wastewater discharge to the harbour means that a waste discharge licence issued under the <i>Water Act 1992</i> would not be required.
Main report – section 3. Updates to Key Environmental Factors	Marine Environmental Quality  Inland Water Environmental Quality  Water and wastewater management	<p>It is recommended that the proponent be required to develop a comprehensive Integrated Water Management Plan for the facility that incorporates operation, monitoring, inspection, maintenance and emergency procedures for of the Process Water Treatment Plant, Water Recycling Plant, stormwater management systems and domestic wastewater (septic) systems. The plan should include a detailed site water balance which is refined as final design specifications are known and updated regularly based on regular performance monitoring during operations. It should also describe contingency plans for if water management and treatment systems do not perform as expected.</p> <p>The proponent states that Marine Environmental Quality is no longer considered a key environmental factor given that wastewater discharge to Darwin Harbour is no longer proposed and that the Marine Environmental Quality Monitoring and Management Plan outlined in the draft EIS is no longer required. Given the close proximity of the proposed facility to Darwin Harbour, monitoring of the surrounding environment should be required to confirm that the project is not causing adverse impacts on surrounding water quality and that mitigation measures employed by the proponent are working satisfactorily. A surface and ground water monitoring plan should be included in the Integrated Water Management Plan.</p>
Main report – section 2.4 Operational Phase Waste Streams	Terrestrial Environmental Quality  Community and Economy  Human Health	<p>The final destination of waste products is yet to be finalised and the Integrated Waste Landform at the Mount Peake mine site or other disused mine site is being considered as potential disposal sites for waste products (section 2.4.7, p.81). The project will generate listed wastes as specified in Schedule 2 of the <i>Waste Management and Pollution Control (Administration) Regulations 1998</i>. These wastes must be:</p> <ul style="list-style-type: none"> <li>• transported from the facility by a person licenced under section 30 of the <i>Waste Management and Pollution Control Act 1998</i> (WMPC Act) to transport the listed waste; and</li> <li>• disposed at a facility licensed under the WMPC Act to accept the type of waste.</li> </ul> <p>Disposal of a listed waste at a mine site will require authorisation in accordance with the WMPC Act.</p> <p>The impact on waste management facilities has not been identified or addressed adequately given the significant volumes of waste that will be generated and the expected 40 year lifespan of the project. The proponent should develop a detailed Waste Management Plan that identifies the type and volume of wastes produced and the location, suitability and capacity of the disposal site to accept the wastes over the short and long-term.</p>

Environmental impact assessment under the Environment Protection Act 2019

<p>Main report – section 2.6 Discharges and Emissions</p>	<p>Air Quality Atmospheric Processes</p>	<p>Previous comments and recommendations made around the regulation of air emissions on the draft EIS remain valid.</p> <p>It is noted that additional air emissions have been identified by the proponent from the inclusion of the Water Recycling Plant (WRP) in the project design and that the key air pollutant from the WRP is ammonia (section 2.6.2, p.88). Due to the odorous nature of ammonia, it is recommended that:</p> <ul style="list-style-type: none"> <li>• odour impact be included in the Project Risk Assessment (Appendix Q) as a risk to the Air Quality and/or Community and Economy environmental factors.</li> <li>• odour management is included in the Environmental Procedures section of the Environmental Management Plan (Appendix M).</li> <li>• odour management is included when regulating air emissions under provisions of the <i>Environment Protection Act 2019</i>.</li> </ul>
<p>Appendix G - Air Quality Assessment</p>	<p>Air Quality Atmospheric Processes</p>	<p>It is recommended that the proponent address the findings of the Air Quality Assessment Review conducted by SLR Consulting Pty Ltd.</p> <p>Also, it the third-party review does not appear to have addressed the NT EPA information request for recommendations for an air emissions monitoring program or contingency options.</p>