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Impact Investment Group

Preliminary Air Quality Assessment of Allied Mills Site located at Elizabeth Street, Kensington

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2. EXECUTIVE SUMMARY

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CETEC were engaged by Impact Investment Group (IIG) to prepare a Preliminary Air Quality Assessment Report of the Allied Mills facility (the site), located at Elizabeth Street, Kensington.

IIG owns the neighbouring Younghusband Wool Stores site, located at 2-50 Elizabeth Street and land at 1-7 Elizabeth Street and 2-12 Barret Street, Kensington (the Masterplan Area).

The objective of this report is to characterise any dust emission, odour or air quality concerns associated with the site which may have implications for the proposed use of the IIG landholdings for the purposes of a wide range of commercial land uses.

At the time of the assessment, no odour was detectable around the site boundaries on Elizabeth and Arden St that could be attributed to the site. Considering the weak nature of the odour of the product, it is unlikely that there will be any off-site impacts.

Minor amounts of flour dust were observed on the site of the building and around the skip in the loading facility. It is expected this would cause little to no off-site impacts. Dust control equipment on site was observed to be used on site. With continuing general maintenance on all systems, the risk of any single 'event' release of dust should be minimal.

An odour and dust survey was administered to thirty people in thirty separate locations around the facility. No specific mentions of nuisance odour or dust was connected to the Younghusband or Allied Mills sites.

CETEC also reviewed the report "*Proposed Development 2-50 Elizabeth St Kensington Air Quality Assessment*" prepared for EG Funds Management, prepared by Environmental Science Associates, dated 21 September 2011. There was no observable changes to the site over the years since 2011. This report reaffirms the findings of the 2011 report that the Allied Mills operations do not result in any off-site odour or dust impacts.

3. INTRODUCTION

CETEC were engaged by Impact Investment Group (IIG) to prepare a Preliminary Air Quality Assessment Report of the Allied Mills facility (the site) located at Elizabeth Street, Kensington.

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IIG owns the neighbouring Younghusband Wool Stores site, located at 2-50 Elizabeth Street and land at 1-7 Elizabeth Street and 2-12 Barret Street, Kensington (the Masterplan Area).

The objective of this report is to characterise any dust emission, odour or air quality concerns associated with the site which may have implications for the proposed use of the IIG landholdings for the purposes of a wide range of commercial land.

The scope of works and deliverables are as follows:

- Conduct a site visit and observe the current site setting.
- Conduct an external inspection of the site and odour survey.
- Assess and characterise any potential odour or dust emissions.
- Consult with local Council and local residents on complaints history.
- Analyse prevailing wind conditions.
- Review the report "*Proposed Development 2-50 Elizabeth St Kensington Air Quality Assessment*" prepared for EG Funds Management, prepared by Environmental Science Associates, dated 21 September 2011.

4. BACKGROUND

4.1 Site Setting

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According to the Allied Mills website, the Kensington Flour Mill has been in operation since 1887. Mixing and milling operations occur at the site, which also includes a rail siding. Materials handled include flours, grains and specialty mixes. An aerial view of the current site is below in Figure 1.



Figure 1: Google Earth photo of the site facing West. Accessed 15/5/17.

The following is a summary of the site boundaries:

- North: Boundary of the Younghusband Wool Stores. A residential area is approximately 200m north of the site.
- East: Elizabeth Street bounds the east of the site. Residential and commercial properties in the streets east of the Elizabeth St. boundary.
- South: Commercial and industrial properties as well as railway lines are to the south of the site.
- West: The railway line bounds the west side of the site. Medium density residential area exists approximately 60m from the site.

4.2 Prevailing Wind

Data from The Bureau of Meteorology shows that the prevailing wind direction for Melbourne is predominantly from the south in the morning and afternoon, with additional northerly wind more common in the afternoon.

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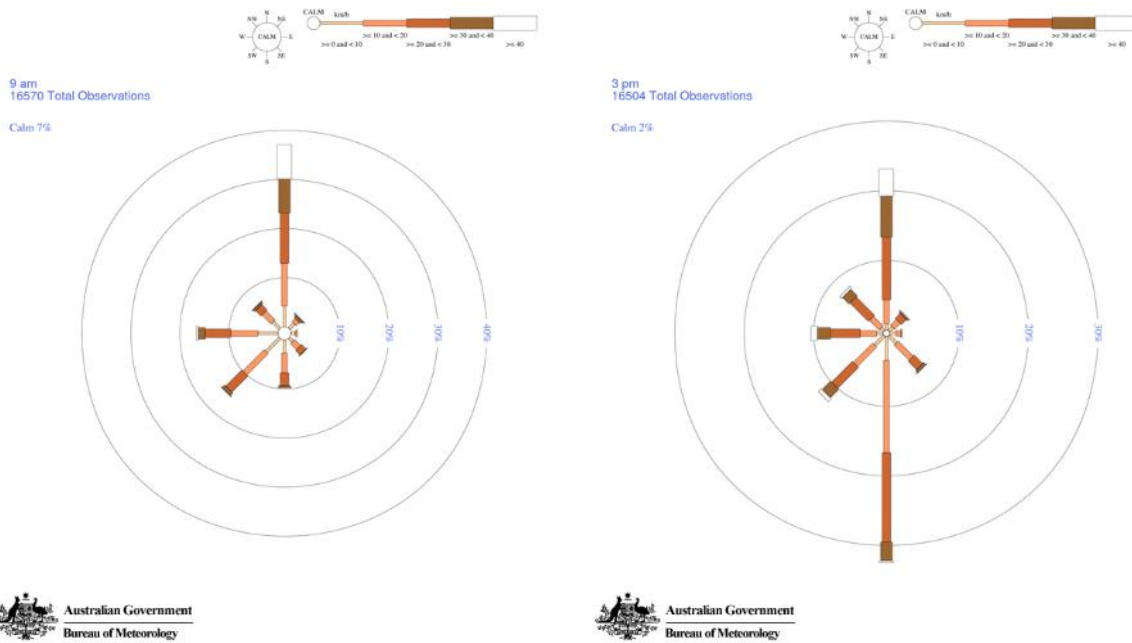


Figure 2: Wind rose data for 9am and 3pm observations. Commonwealth of Australia 2017. Accessed 15/5/17. Diagrams show wind direction.

5. SITE ASSESSMENT

CETEC consultant Julien Colangelo conducted an external inspection of the site from Elizabeth and Arden Streets, on Tuesday 16th May 2017. The surrounding streets were also briefly observed in order to further characterise any potential off site impacts. A light southerly wind was blowing at the time.

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5.1 Dust Emissions

It can be seen from Google Maps photographs that grain is received by rail and truck at the site in partially enclosed facilities. Both the rail and truck receiving facilities have enclosed roofs and partially enclosed sides. A dust extraction system with multiple fans is visible to be in operation. From this visual evidence it appears that appropriate control measures are in place to minimise dust emissions from the facility. Refer to Figure 3 below.



Figure 3: Truck and rail unloading facilities. Picture from Google Street View 2009. Accessed 15/5/17.

During the site inspection no grain was being received at the facilities. The inside of the receiving facilities can be clearly seen in Figure 2 below. The dust extraction system inside the truck facility can also be clearly seen.

A skip carrying bags of waste product or by-product can be seen with some minor flour dust spilled on the ground. This amount is considered to be minor and it is expected this will have little to no off-site impact.

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Figure 4: Truck and rail unloading facilities. Photographed 16/5/17.

Subsequent milling, blending and bagging activities are conducted internally at the factory. Generally, these activities are enclosed as far as practicable and dust collection and control systems are usually in place to minimise any dust emissions. With continuing general maintenance on all systems, the risk of any single 'event' release of dust should be minimal.

On the north facing wall of the silo building, some flour dust can be seen emitted from vents on the walls. On the site inspection, it was observed that there is a minor dust build-up. The dust is generally limited to a few meters of the vents and are several meters above street level. This represents a minor source of dust emission from site but is expected to have little to no off-site impacts.

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Figure 5: North face of the site showing suspected flour dust emitted on wall. Google Maps accessed 15/5/17. Photograph taken 16/5/17.

5.2 Odour Emissions

Grain and flour odours can be generally characterised as a weak to very weak, slightly sweet smell. Considering that the site does not undertake any heating or cooking of the products and that dust levels are minimal, it is unlikely that any nuisance odours would occur under normal circumstances.

At the time of the assessment, no odour was detectable around the site boundaries on Elizabeth and Arden St that could be attributed to the site. No odour attributed to the site was detectable in the surrounding side streets.

It is possible that during the periodic delivery of grain that this may change however considering the weak nature of the odour of the product, it is unlikely that there will be any off-site impacts.

5.3 Review of previous reports

The client requested CETEC to review a previous report prepared for the site titled *“Proposed Development 2-50 Elizabeth St Kensington Air Quality Assessment”* prepared for EG Funds Management, prepared by Environmental Science Associates, dated 21 September 2011.

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In the 2011 report, the consultant reported noticing a very mild, inoffensive ‘flour’ aroma from the Allied Mills’ operations and that this wouldn’t have any significant effect on the amenity of the surrounding area. The report also states that there is virtually no risk of an increase in odour emission as Allied Mills’ processes do not generate significant odours and that there is no odour control equipment to ‘fail’.

There was also an apparent absence of any significant concerns by local residents in relation to dust emissions. It was concluded that there is little risk of any substantial increase in dust emissions as a result of a failure of dust control equipment, as bag houses have multiple fabric filters and the failure of any one filter would have small influence on the overall emission rate.

In comparison with the current site conditions there has been no observable change in conditions over the years since the 2011 report. This shows that there is unlikely to be any change to odour or dust emissions in future if current processes at the Allied Mills site continue as normal.

5.4 Odour and Dust survey

CETEC prepared an Odour and Dust Survey that was administered by Renton and Co to thirty people in separate locations around the facility. The survey was conducted over Saturday and Sunday on the 28th of May 2017

The majority of respondents (22 of 30) have never experienced nuisance odour in the neighbourhood. The largest number of complaints referred to a gas leak (3 of 30) and car pollution (2 or 30). One person from Bellair Street referred to a 'grainy' or 'animal food' smell when the wind blew from the north. The odour was described as rare, faint and not very noticeable. It is likely that this barely noticeable odour was due to the Allied Mills site, given the direction of the wind and the proximity to Bellair Street, however it appears to have little or any impact.

Fourteen people (14 of 30) reported to never have any issue with nuisance dust. Of the remaining people, 10 reported dust that was tree / pollen related and 4 was related to car / road dust. Two people reported dust due to 'containers moving at railway station' and that the 'train station makes dust'. Both people reported that the level of dust was 'as expected' and that in the last 12 months the dust levels had 'stayed the same'. It is not clear if this is due to any activity at the Allied Mill site as it may also be due to rail traffic from the Kensington and South Kensington railway lines, and the major container yard south of South Kensington.

A copy of the Renton and Co report has been included in Appendix A of this report.

5.5 History of complaints

As part of the assessment, CETEC contacted the Environment Protection Authority (EPA) Victoria and the local council (City of Melbourne) to enquire if there had been any history of complaints relating to the Allied Mills Facility.

Both the EPA and City of Melbourne did not have any history of complaints relating to dust or odour emissions.

6. CONCLUSIONS

At the time of the assessment, no odour was detectable around the site boundaries on Elizabeth and Arden St that could be attributed to the site. Considering the weak nature of the odour of the product, it is unlikely that there will be any off-site impacts.

Minor amounts of flour dust were observed on the site of the building and around the skip in the loading facility. It is expected this would cause little to no off-site impacts. Dust control equipment on site was observed to be used on site. With continuing general maintenance on all systems, the risk of any single 'event' release of dust should be minimal.

The odour and dust survey administered have no specific mentions of nuisance odour or dust was connected to the Younghusband or Allied Mills sites.

CETEC also reviewed the report *"Proposed Development 2-50 Elizabeth St Kensington Air Quality Assessment"* prepared for EG Funds Management, prepared by Environmental Science Associates, dated 21 September 2011. There was no observable changes to the site over the years since 2011. This report reaffirms the findings of the 2011 report that the Allied Mills operations do not result in any off-site odour or dust impacts.

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7. DISCLAIMER AND COPYRIGHT

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7.1 Disclaimer

CETEC has taken all reasonable care to ensure that the information contained in this report is accurate. The report is based on data and information collected by CETEC personnel during location visits and information accepted in good faith from various personnel associated with this work. However, no warranty or representation can be given that the information and materials contained in it are complete or free from errors or inaccuracies.

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8. APPENDIX A: ODOUR AND DUST SURVEY SUMMARY



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CETEC ODOUR AND DUST SURVEY FEEDBACK

Thirty (30) survey responses were collected over Saturday 27 and Sunday 28 May via intercept at meeting points in the community: train station, shopping precincts, Kensington Recreation Centre and JJ Holland Park, and, via door knock in targeted streets.

High level demographics captured

- sixteen (16) women and 14 men
- all age ranges from under 14 to over 75
- twenty-four (24) separate street addresses across the Kensington community plus 2 community housing tenants
- a combination of owners and renters, plus 5 business
- seven (7) people identified as having a first language other than English (Somali, Malayalam, Telugu, Thai, Hokkien, Chinese and French)
- five (5) people living above 2 stories.

High level feedback to questions about odour

- the majority of respondents, (22 of 30) have never experienced nuisance odours in the neighbourhood
- of those who did, the largest number of complaints referred to a gas leak (3 of 30) in McConnell, Anthony and Hampden Streets
- the second highest complaint was car pollution (2 of 30)
- other single issues included:
 - fish markets
 - recycle plant in Dynon Road
 - drain ventilation pole
 - rubbish bins not being emptied
 - broken sewerage pipes
 - stagnant storm water
 - wood fires (described as fragrant)
- one person specifically mentioned a nuisance 'factory' odour when walking down Elizabeth Street (described as 'toxic' and 'slimy')
- one person specifically mentioned a 'grainy' or 'animal food' smell, and indicated that this came when the winds were blowing from the north
- two people indicated they could smell a 'chemical' or 'industry' smell but did not elaborate further.

Note: several people referred to odour as dust - these responses were captured in the questions to nuisance dust.

High level feedback to questions about dust

- fourteen (14) of the said they have never had an issue with nuisance dust
- one (1) person said they rarely had an issue with nuisance dust
- of those other 15 people who sometimes, or often had an issue with nuisance dust, 10 people indicated that this was tree/pollen related
- the second highest response (4 of 30) was car/road dust
- two (2) people mentioned rail yards and container movement
- other single issues included:
 - tram routes
 - City Link project
 - ordinary dust.

Other observations

- there was no real perceivable difference in opinion between any of the cohorts: age, men/women/other, owners/renters/business, first language other than English, low rise or high rise (although one person did comment that living higher meant you were less impacted by odour or dust).

The individual survey sheets will provide additional data.

Thank you for this opportunity. Please feel free to contact me with any questions.

Best

Desley

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