

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Licence Details

Number:	6423
Anniversary Date:	19-December
Review Due Date:	21-Feb-2011

Licensee

WESTON ALUMINIUM PTY LIMITED
PO BOX 5523
WEST CHATSWOOD NSW 1515

Licence Type

Premises

Premises

WESTON ALUMINIUM PTY LTD
129 MITCHELL AVENUE
KURRI KURRI NSW 2327

Scheduled Activity

Metallurgical activities
Waste storage
Resource recovery

Fee Based Activity

Waste storage - Hazardous, restricted solid, liquid, clinical & related waste & Asbestos waste
Aluminium production (scrap metal)
Recovery of hazardous and other waste
Scrap metal processing

Scale

0 - All
> 10000 - T processed
0 - All
0 - 100000 T processed

Region

North East - Hunter
Ground Floor, NSW Govt Offices, 117 Bull Street
NEWCASTLE WEST NSW 2302
Phone: 02 49086800
Fax: 02 49086810

PO Box 488G NEWCASTLE
NSW 2300

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

INFORMATION ABOUT THIS LICENCE	4
Dictionary.....	4
Responsibilities of licensee	4
Variation of licence conditions.....	4
Duration of licence	4
Licence review	4
Fees and annual return to be sent to the EPA.....	4
Transfer of licence	5
Public register and access to monitoring data.....	5
1 ADMINISTRATIVE CONDITIONS	5
A1 What the licence authorises and regulates	5
A2 Premises to which this licence applies.....	6
A3 Other activities.....	7
A4 Information supplied to the EPA	7
2 DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND	7
P1 Location of monitoring/discharge points and areas	7
3 LIMIT CONDITIONS	9
L1 Pollution of waters	9
L2 Load limits	9
L3 Concentration limits	10
L4 Volume and mass limits.....	11
L5 Waste	11
L6 Noise Limits.....	12
L7 Polychlorinated Biphenyls (PCBs)	13
L8 Asbestos	13
L9 Potentially offensive odour.....	13
4 OPERATING CONDITIONS	13
O1 Activities must be carried out in a competent manner	13
O2 Maintenance of plant and equipment.....	13
O3 Processes and management	14
O4 Dust Control.....	14
O5 Waste - Operating conditions	14
O6 Air - Operating conditions.....	14
5 MONITORING AND RECORDING CONDITIONS	15
M1 Monitoring records.....	15
M2 Requirement to monitor concentration of pollutants discharged	15
M3 Testing methods - concentration limits.....	18
M4 Recording of pollution complaints	18
M5 Telephone complaints line	19

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

M6	Requirement to monitor volume or mass	19
6	REPORTING CONDITIONS	19
R1	Annual return documents.....	19
R2	Notification of environmental harm	21
R3	Written report.....	21
	GENERAL CONDITIONS	22
G1	Copy of licence kept at the premises	22
	POLLUTION STUDIES AND REDUCTION PROGRAMS	22
U1	Continuous Improvement and Performance Benchmarking – Dioxin and Furan	22
U2	Spent Potlining Material Processing Trial	23
	SPECIAL CONDITIONS.....	24
E1	Compliance audit.....	24
	DICTIONARY	24
	General Dictionary	24

Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act); and
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

The EPA publication "A Guide to Licensing" contains information about how to calculate your licence fees.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

WESTON ALUMINIUM PTY LIMITED
PO BOX 5523
WEST CHATSWOOD NSW 1515

subject to the conditions which follow.

1 Administrative conditions

A1 What the licence authorises and regulates

A1.1 Not applicable.

A1.2 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity
Metallurgical activities
Waste storage
Resource recovery

Fee Based Activity	Scale
Waste storage - Hazardous, restricted solid, liquid, clinical & related waste & Asbestos waste	0 - All
Aluminium production (scrap metal)	> 10000 - T processed
Recovery of hazardous and other waste	0 - All
Scrap metal processing	0 - 100000 T processed

A1.3 Not applicable.

A2 Premises to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
WESTON ALUMINIUM PTY LTD
129 MITCHELL AVENUE
KURRI KURRI
NSW
2327
LOT 796 DP39877

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

A3 Other activities

A3.1 Not applicable.

A4 Information supplied to the EPA

A4.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:

- (a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
- (b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

2 Discharges to air and water and applications to land

P1 Location of monitoring/discharge points and areas

P1.1 The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Air

EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Description of Location
1	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	"Stack 1" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010 .
2	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	"Stack 2" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010.
3	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	"Stack 3" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010.
4	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	"Stack 4" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010.
13	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	"Stack 5" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010
14	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	Emissions from gas combustion side of reverberatory furnace shown as "Stack 6" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010.
15	Air emissions monitoring Discharge to air	Air emissions monitoring Discharge to air	Emissions from stack serving the ALDEX pre-processing plant "Stack 7" on drawing titled "Proposed Site Plan" submitted to the EPA on 2 March 2010.

- P1.2 The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.
- P1.3 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.

Water and land

EPA identification no.	Type of monitoring point	Type of discharge point	Description of location
12	Stormwater quality monitoring		Main pond on drawing "Figure 1 First Flush Stormwater Irrigation Plan" in "Pollution Study and Reduction Program Condition U2.1 Irrigation Sustainability Assessment Weston Aluminium, Kurri Kurri" prepared by HLA - Envirosciences Pty Ltd dated 1/12/06.

3 Limit conditions

L1 Pollution of waters

- L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Load limits

- L2.1 The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.

Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.

- L2.2 The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol.

Assessable Pollutant	Load limit (kg)
Coarse Particulates (Air)	6538
Fine Particulates (Air)	11622
Fluoride (Air)	1894
Nitrogen Oxides (Air)	22803
Sulfur Oxides (Air)	14935
Volatile organic compounds (Air)	3984

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

L3 Concentration limits

- L3.1 For each monitoring/discharge point or utilisation area specified in the table\>s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.
- L3.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.
- L3.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\>s.

Air

POINT 1

Pollutant	Units of measure	100 percentile concentration limit
Nitrogen Oxides	grams per cubic metre	2.5
Hydrogen chloride	milligrams per cubic metre	400
Solid Particles	milligrams per cubic metre	25
Sulfuric acid mist and sulfur trioxide (as SO ₃)	milligrams per cubic metre	100
Carbon monoxide	parts per million	100
Gaseous fluoride	milligrams per cubic metre	2
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	10

POINT 2

Pollutant	Units of measure	100 percentile concentration limit
Solid Particles	milligrams per cubic metre	35

POINT 3

Pollutant	Units of measure	100 percentile concentration limit
Solid Particles	milligrams per cubic metre	50

POINT 4

Pollutant	Units of measure	100 percentile concentration limit
Solid Particles	milligrams per cubic metre	24

POINT 13

Pollutant	Units of measure	100 percentile concentration limit
Nitrogen Oxides	milligrams per cubic metre	100
Volatile organic compounds	milligrams per cubic metre	77 Note 1
Dioxins & Furans	nanograms per cubic metre	0.1 Note 2
Hydrogen chloride	milligrams per cubic metre	10
Solid Particles	milligrams per cubic metre	10
Sulfuric acid mist and sulfur trioxide (as SO ₃)	milligrams per cubic metre	100
Carbon monoxide	milligrams per cubic metre	125 Note 3
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	5

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

POINT 14

Pollutant	Units of measure	100 percentile concentration limit
Dioxins & Furans	nanograms per cubic metre	0.1 Note 2
Solid Particles	milligrams per cubic metre	10

POINT 15

Pollutant	Units of measure	100 percentile concentration limit
Solid Particles	milligrams per cubic metre	15

Note 1: Limit value is a rolling 1-hour average. VOC as n-hexane (dry, 273 K, 101.3 kPa).

Note 2: Limit value is a rolling annual average. Polychlorinated-dibenzo-p-dioxins (PCDD) and polychlorinated-dibenzofurans (PCDF) as 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD) equivalent calculated in accordance with the procedures included in Part 4, Clause 29 of the Protection of the Environment Operations (Clean Air) Regulation 2002, (dry, 273 K, 101.3 kPa).

Note 3: Limit value is a rolling 1 hour average.

L3.4 The concentration of gaseous fluoride emitted to the atmosphere from Point 1 must not exceed 1.4 milligrams per cubic metre of fluoride, measured as a one hour average.

L3.5 Total plant gaseous fluoride emissions must not exceed 0.25kg/hr.

L3.6 Total plant particulate emissions must not exceed 5.43 kg/hour.

L4 Volume and mass limits

L4.1 Not applicable.

L5 Waste

L5.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below.

Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below.

Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below.

Condition L5.1 does not limit any other conditions in this licence.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Code	Waste	Description	Activity	Other Limits
D300	Non-toxic salts	Aluminium Dross	Store and Process (non-thermal treatment)	Quantity must not exceed 5000 tonnes at any time and 40,000 tonnes per year
D300	Non-toxic salts	Aluminium smelter waste (spent potlining)	Store and Process (non-thermal treatment)	Quantity must not exceed 40 tonnes at any time and processing must only occur during the processing trial to be conducted on 14 and 15 August 2010.
NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the <i>Protection of the Environment Operations (Waste) Regulation 2005</i>	As specified in each particular resource recovery exemption.	NA
NA		Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA

L6 Noise Limits

L6.1 To restrict noise impacts, truck movements to and from the premise must be limited to between the hours of 7am and 10pm.

L6.2 Noise from the premises must not exceed the noise limits presented in the table below:

Location	Daytime (7am to 6pm, Monday to Saturday, 8am to 6pm Sundays and public holidays)	Evening (6pm to 10pm)	Night time (10pm to 7am, Monday to Saturday, 10pm to 8am Sundays and public holidays)
Residences at the corner of Government and 10 th Streets	L _{Aeq} (15 minute) 48 dB(A)	L _{Aeq} (15 minute) 48 dB(A) L _{Aeq} (evening) 40 dB(A)	L _{Aeq} (15 minute) 47 dB(A) L _{Aeq} (night) 35 dB(A) L _{Aeq} (1 minute) 57 dB(A)
Residences on Northcote Street	L _{Aeq} (15 minute) 44 dB(A)	L _{Aeq} (15 minute) 44 dB(A)	L _{Aeq} (15 minute) 44 dB(A) L _{Aeq} (night) 40 dB(A) L _{Aeq} (1 minute) 57 dB(A)
Residences in the light Industrial Zone on Mitchell Avenue and Railway Avenue	L _{Aeq} (15 minute) 43 dB(A)	L _{Aeq} (15 minute) 43 dB(A)	L _{Aeq} (15 minute) 43 dB(A) L _{Aeq} (night) 41 dB(A) L _{Aeq} (1 minute) 55 dB(A)

Note: Where amenity noise levels are lower than intrusive noise levels, both levels are in the licence conditions in order to ensure that intrusive noise impacts are controlled at all times.

The noise limits presented in the table apply under winds up to 3 m/s (at 10 metres height) and Pasquill Stability Categories A to F.

L7 Polychlorinated Biphenyls (PCBs)

Note: The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the "Chemical Control Order in Relation to Materials and Wastes Containing Polychlorinated Biphenyl, 1997".

L8 Asbestos

Note: The licensee must comply with the conditions as specified in this licence or where no specific conditions are outlined in this licence, the licensee must comply with the Protection of the Environment Operations (Waste) Regulation 1996.

L9 Potentially offensive odour

L9.1 No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.

Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.

4 Operating conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.

This includes:

- (a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
- (b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

- (a) must be maintained in a proper and efficient condition; and
- (b) must be operated in a proper and efficient manner.

O3 Processes and management

- O3.1 The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored and/or treated and/or processed and/or reprocessed and/or disposed at the premises is assessed and classified in accordance with the DECC Waste Classification Guidelines as in force from time to time.
- O3.2 The licensee must ensure that waste identified for recycling is stored separately from other waste.
- O3.3 All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in-place.
- O3.4 The licensee must ensure that suitable measures (e.g. high/low alarms, control valves with interlock control, one way valves) are installed on all tanks, ponds or clarifiers and associated pipes and hoses to prevent the spillage of waste.

O4 Dust Control

- O4.1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

O5 Waste - Operating conditions

- O5.1 The licensee must ensure that the loading and unloading of hazardous or restricted solid waste on and off vehicles, within the controlled waste facility is carried out in a suitable enclosed area.

The enclosed area must effectively contain any spillage of hazardous or restricted solid waste and prevent the ingress of water.

Notwithstanding this precautionary measure the licensee must co-operate with the transporter to ensure that loading and unloading operations are carried out in such a way as to prevent the spillage of waste and prevent the ingress of water into the loading and unloading area.

O6 Air - Operating conditions

- O6.1 The continuous fluoride emission monitoring system must activate visible and audible alarms in the event that the concentration of fluoride emitted to atmosphere exceeds the limit value of 1.4 milligrams per cubic metre.
- O6.2 If the 1 hour average concentration of gaseous fluoride emitted to atmosphere exceeds 1.4 milligrams per cubic metre at Point 1 then the plant or section of the plant where the exceedence occurs must cease operating until the licensee is able to ensure compliance with the emission limits specified in this licence.

5 Monitoring and recording conditions

M1 Monitoring records

- M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.
- M1.2 All records required to be kept by this licence must be:
- in a legible form, or in a form that can readily be reduced to a legible form;
 - kept for at least 4 years after the monitoring or event to which they relate took place; and
 - produced in a legible form to any authorised officer of the EPA who asks to see them.
- M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
- the date(s) on which the sample was taken;
 - the time(s) at which the sample was collected;
 - the point at which the sample was taken; and
 - the name of the person who collected the sample.

M2 Requirement to monitor concentration of pollutants discharged

- M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

POINT 1

Pollutant	Units of measure	Frequency	Sampling Method
Carbon monoxide	parts per million	Yearly	OM-1
Gaseous fluoride	milligrams per cubic metre	Continuous	In line instrumentation
Hydrogen chloride	milligrams per cubic metre	Yearly	TM-7 & TM-8
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Sulfuric acid mist and sulfur trioxide (as SO ₃)	milligrams per cubic metre	Yearly	TM-3
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Yearly	TM-12, TM-13 & TM-14

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

POINT 2

Pollutant	Units of measure	Frequency	Sampling Method
Solid Particles	milligrams per cubic metre	Yearly	TM-15

POINT 3

Pollutant	Units of measure	Frequency	Sampling Method
Solid Particles	milligrams per cubic metre	Yearly	TM-15

POINT 4

Pollutant	Units of measure	Frequency	Sampling Method
Solid Particles	milligrams per cubic metre	Yearly	TM-15

POINT 12

Pollutant	Units of measure	Frequency	Sampling Method
Aluminium	milligrams per litre	Yearly	Grab sample
Conductivity	microsiemens per centimetre	Yearly	Grab sample
Fluoride	milligrams per litre	Yearly	Grab sample
Total suspended solids	milligrams per litre	Yearly	Grab sample
pH	pH	Yearly	Grab sample

POINT 13

Pollutant	Units of measure	Frequency	Sampling Method
Dioxins & Furans	nanograms per cubic metre	Quarterly	TM-18
Dry gas density	kilograms per cubic metre	Quarterly	TM-23
Fluorides	milligrams per cubic metre	Yearly	TM-10
Hydrogen chloride	milligrams per cubic metre	Yearly	TM-7 & TM-8
Moisture content	percent	Yearly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Oxygen (O ₂)	percent	Quarterly	TM-25
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Sulfuric acid mist and sulfur trioxide (as SO ₃)	milligrams per cubic metre	Yearly	TM-3
Temperature	degrees Celsius	Yearly	TM-2
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	Yearly	TM-12, TM-13 & TM-14
Velocity	metres per second	Quarterly	TM-2
Volatile organic compounds	milligrams per cubic metre	Yearly	OM-2
Volumetric flowrate	normalised cubic metres per second	Quarterly	TM-2

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

POINT 14

Pollutant	Units of measure	Frequency	Sampling Method
Carbon monoxide	milligrams per cubic metre	Yearly	OM-1
Dioxins & Furans	nanograms per cubic metre	Quarterly	TM-18
Dry gas density	kilograms per cubic metre	Quarterly	TM-23
Moisture content	percent	Quarterly	TM-22
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Oxygen (O ₂)	percent	Quarterly	TM-25
Solid Particles	milligrams per cubic metre	Yearly	TM-15
Temperature	degrees Celsius	Quarterly	TM-2
Velocity	metres per second	Quarterly	TM-2
Volumetric flowrate	normalised cubic metres per second	Quarterly	TM-2

POINT 15

Pollutant	Units of measure	Frequency	Sampling Method
Solid Particles	milligrams per cubic metre	Yearly	TM-15

M2.2 For each monitoring/discharge point specified below (by a point number), the licensee must adjust the monitoring results for the pollutants listed in Column 1 to the units of measure and reference conditions specified opposite in the other columns.

POINT 13

Pollutant / Parameter	Units of measure	Reference Conditions
Volatile organic compounds (VOC) ¹	mg/m ³	Dry, 273 K 101.3 kPa
Volumetric flow rate	Nm ³ /s	Dry, 273 K, 101.3 kPa
Hydrogen Chloride	mg/m ³	Dry, 273 K 101.3 kPa
Nitrogen dioxide (NO ₂) or nitric oxide (NO) or both	mg/m ³	Dry, 273 K 101.3 kPa
Solid Particles	mg/m ³	Dry, 273 K 101.3 kPa
PCDD and PCDF ²	ng/ m ³	Dry, 273 K 101.3 kPa
Carbon monoxide	mg/m ³	Dry, 273 K 101.3 kPa

POINT 14

Pollutant / Parameter	Units of measure	Reference Conditions
Volumetric flow rate	Nm ³ /s	Dry, 273 K, 101.3 kPa
Solid Particles	mg/m ³	Dry, 273 K 101.3 kPa, 3% oxygen
PCDD and PCDF ²	ng/ m ³	Dry, 273 K 101.3 kPa, 3% oxygen
Carbon monoxide	mg/m ³	Dry, 273 K 101.3 kPa, 3% oxygen
Nitrogen dioxide (NO ₂) or nitric oxide (NO) or both	mg/m ³	Dry, 273 K 101.3 kPa, 3% oxygen

Note 1: VOC as n-hexane (dry, 273 K, 101.3 kPa).

Note 2: Polychlorinated-dibenzo-p-dioxins (PCDD) and polychlorinated-dibenzofurans (PCDF) as 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD) equivalent calculated in accordance with the

procedures included in Part 4, Clause 29 of the Protection of the Environment Operations (Clean Air) Regulation 2002, (dry, 273 K, 101.3 kPa).

- M2.3 The selection of sampling positions must be carried out in accordance with test method TM-1.
- M2.4 For the purposes of the Fluoride monitoring required for Point 1 in-line instrumentation means a continuous gaseous fluoride monitor.

M3 Testing methods - concentration limits

- M3.1 Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:
- (a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or
 - (b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or
 - (c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.

Note: The Protection of the Environment Operations (Clean Air) Regulation 2002 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".

- M3.2 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

Note: Testing methods - load limit

- Note: Clause 18 (1), (1A) and (2) of the Protection of the Environment Operations (General) Regulation 1998 requires that monitoring of actual loads of assessable pollutants listed in L2.1 must be carried out in accordance with the testing method set out in the relevant load calculation protocol for the fee-based activity classification listed in condition A1.2.

M4 Recording of pollution complaints

- M4.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.
- M4.2 The record must include details of the following:
- (a) the date and time of the complaint;
 - (b) the method by which the complaint was made;

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

- (c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- (d) the nature of the complaint;
- (e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- (f) if no action was taken by the licensee, the reasons why no action was taken.

M4.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M4.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M5 Telephone complaints line

M5.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M5.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M5.3 Conditions M5.1 and M5.2 do not apply until 3 months after:

- (a) the date of the issue of this licence or
- (b) if this licence is a replacement licence within the meaning of the Protection of the Environment Operations (Savings and Transitional) Regulation 1998, the date on which a copy of the licence was served on the licensee under clause 10 of that regulation.

M6 Requirement to monitor volume or mass

M6.1 Not applicable.

6 Reporting conditions

R1 Annual return documents

What documents must an Annual Return contain?

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

- (a) a Statement of Compliance; and
- (b) a Monitoring and Complaints Summary.

A copy of the form in which the Annual Return must be supplied to the EPA accompanies this licence. Before the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Period covered by Annual Return

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:

- (a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
- (b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:

- (a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
- (b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

Deadline for Annual Return

R1.5 The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

Notification where actual load can not be calculated

R1.6 Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify:

- (a) the assessable pollutants for which the actual load could not be calculated; and
- (b) the relevant circumstances that were beyond the control of the licensee.

Licensee must retain copy of Annual Return

R1.7 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

Certifying of Statement of Compliance and signing of Monitoring and Complaints Summary

R1.8 Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:

- (a) the licence holder; or

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

(b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

R1.9 A person who has been given written approval to certify a certificate of compliance under a licence issued under the Pollution Control Act 1970 is taken to be approved for the purpose of this condition until the date of first review of this licence.

R2 Notification of environmental harm

Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:

- (a) where this licence applies to premises, an event has occurred at the premises; or
- (b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,

and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:

- (a) the cause, time and duration of the event;
- (b) the type, volume and concentration of every pollutant discharged as a result of the event;
- (c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
- (d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- (e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- (f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- (g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further

details to the EPA within the time specified in the request.

Noise Monitoring

- R3.5 An noise compliance assessment report shall be prepared every three years and submitted to the EPA with the Annual Return. The report shall be prepared by an accredited acoustical consultant and shall provide an assessment of compliance with Condition L6.

General conditions

G1 Copy of licence kept at the premises

- G1.1 A copy of this licence must be kept at the premises to which the licence applies.
- G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.
- G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

Pollution studies and reduction programs

U1 Continuous Improvement and Performance Benchmarking – Dioxin and Furan Emission Control

The objective of this condition is to ensure that operational measures are in place to ensure control of dioxin and furan emissions from the reverberatory furnace. The licensee must complete the following works, monitoring and reporting requirements until the objective is achieved:

U1.1 Stage 3A – Demonstrate auditable means of measuring lime usage rates

The licensee must demonstrate that the lime dose rate to Baghouse 5 (serving the reverberatory furnace) can be continuously controlled in an auditable manner. At any point in time, the licensee must be able to demonstrate that the amount of lime in use within Baghouse 5 is sufficient to maintain dioxin and furan emissions to the maximum extent possible.

The licensee must submit a report to the Regional Manager Hunter which details the method to be used to continuously control and measure lime dose rate to Baghouse 5 **by no later than 31 August 2010**.

Note: The EPA will review the frequency of monitoring for dioxins and furans at Point 13 following the completion of this Pollution Reduction Program.

U1.2 Demonstrate auditable means of measuring metal level within Reverberatory furnace

The licensee must develop a continuous and auditable means of demonstrating that the level of molten metal within the reverberatory furnace is high enough to prevent contaminated emissions from the melt side of the reverberatory furnace (the sidewall) from reporting to the holding (gas combustion) side of the reverberatory furnace and being emitted via Point 14.

The licensee must provide a report to the EPA's Regional Manager, Hunter which details the proposed method of continuously monitoring and recording the appropriate level of molten metal within the reverberatory furnace by no later than 31 August 2010.

Note: The EPA will review the requirement to monitor dioxins and furans at Point 14 from the licence following completion of this Pollution Reduction Program.

U1.3 Describe procedures to minimise fugitive emissions from reverberatory furnace

The licensee must submit a report to the EPA's Regional Manager, Hunter by no later than 31 August 2010 which describes operational procedures for ensuring that fugitive emissions from the reverberatory furnace are captured by the fume extraction system serving the reverberatory furnace. These measure could include, but need not be limited to the following:

- Demonstrating that the fume extraction system can operate effectively to capture all emissions from the melting of scrap metal under variable wind speeds and directions; or
- No loading of scrap metal in the reverberatory furnace when prevailing wind conditions will compromise the performance of the fume extraction hood serving the furnace
- Keeping doors to the plant building closed after the addition of scrap metal to the reverberatory furnace
- Ensuring that scrap metal is placed as close as possible to the enclosed wall of the melt bath.

U2 Spent Potlining Material Processing Trial

- U2.1 For the duration of the Spent Potlining Material Processing Trial, the licensee must:
- a) monitor and record, air emissions, including cyanide, hydrogen cyanide, fluoride, particulates and all pollutants and all other parameters specified in condition M2.1 for Point 1;
 - b) monitor and record all processing conditions for the trial, including:
 - i. the quantity and characteristics of all inputs;
 - ii. the processing methods, including the rotary furnace temperature profile and the duration of thermal treatment;
 - c) undertake real-time monitoring of fluoride and particulate emissions and immediately cease processing, and notify DECCW, should any exceedance of the limits at condition L3.3 be exceeded;
 - d) ensure all spent potlining material is appropriately banded and covered to prevent the emission of spent potlining dust, flammable gases and the contamination of stormwater.

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

U2.2 The Licensee must prepare a detailed report, on the outcomes of the Spent Potlining Material Processing Trial. The report must:

- a) detail the results of the monitoring required in condition U2.1 above;
- b) compare the results of the trial to the laboratory results described in the report dated 30 April 2010 prepared by K2 Environmental Limited, the limits at condition L3.3 of this licence and DECCW's air quality impact assessment criteria specified in the *"Approved Methods for the Modelling and Assessment of Air Pollutants in NSW"* (DEC 2005);
- c) describe any anomalies in the monitoring data, and any exceedances of the limits or assessment criteria;
- d) characterise the trial outputs and describe how these products are to be managed and disposed of;
- e) summarise the findings of the trial;
- f) recommend any actions that could be taken to minimise emissions during any future processing of spent potlining material; and
- g) discuss the likely options for any future processing.

The report must be submitted to DECCW's Regional Manager, Hunter within 90 days of the completion of the Spent Potlining Material Processing Trial.

Special conditions

E1 Compliance audit

E1.1 The licensee must conduct an independent compliance audit no less than once every three (3) years to assess and report on compliance with the conditions of this licence, including the adequacy of the documentation required by this licence. A report containing the audit findings must be submitted with the Annual Return.

Dictionary

General Dictionary

In this licence, unless the contrary is indicated, the terms below have the following meanings:

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998

Environment Protection Licence



Licence - 6423

AM	Together with a number, means an ambient air monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 1998.
flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 1998
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997

Environment Protection Licence



Licence - 6423

MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 months. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .
TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

Mr Bernie Weir

Environment Protection Authority

(By Delegation)

Date of this edition - 10-Aug-2010

End Notes

- | | |
|----|--|
| 1 | Licence varied by notice 1013185, issued on 28-Nov-2001, which came into effect on 23-Dec-2001. |
| 2 | Licence varied by notice 1014219, issued on 15-Apr-2002, which came into effect on 10-May-2002. |
| 3 | Licence varied by notice 1017402, issued on 30-Aug-2002, which came into effect on 24-Sep-2002. |
| 4 | Licence varied by notice 1026798, issued on 14-Aug-2003, which came into effect on 08-Sep-2003. |
| 5 | Licence varied by notice 1036624, issued on 02-Sep-2004, which came into effect on 27-Sep-2004. |
| 6 | Licence varied by notice 1051350, issued on 21-Feb-2006, which came into effect on 18-Mar-2006. |
| 7 | Licence varied by notice 1059849, issued on 14-Sep-2006, which came into effect on 14-Sep-2006. |
| 8 | Licence varied by notice 1068022, issued on 03-May-2007, which came into effect on 03-May-2007. |
| 9 | Licence varied by notice 1075595, issued on 04-Sep-2007, which came into effect on 04-Sep-2007. |
| 10 | Licence varied by notice 1079692, issued on 01-Nov-2007, which came into effect on 01-Nov-2007. |
| 11 | Licence varied by notice 1082016, issued on 18-Jan-2008, which came into effect on 18-Jan-2008. |
| 12 | Licence varied by notice 1084007, issued on 27-Mar-2008, which came into effect on 27-Mar-2008. |
| 13 | Licence varied by notice 1087174, issued on 14-May-2008, which came into effect on 14-May-2008. |
| 14 | Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date> |

Environment Protection Licence

Licence - 6423



Environment,
Climate Change
& Water

End Notes

15	Licence varied by notice 1093631, issued on 03-Dec-2008, which came into effect on 03-Dec-2008.
16	Licence varied by notice 1096523, issued on 01-May-2009, which came into effect on 01-May-2009.
17	Licence varied by notice 1106654, issued on 25-Sep-2009, which came into effect on 25-Sep-2009.
18	Licence varied by notice 1108647, issued on 13-Nov-2009, which came into effect on 13-Nov-2009.
19	Licence varied by notice 1111022, issued on 01-Feb-2010, which came into effect on 01-Feb-2010.
20	Licence varied by notice 1111304, issued on 23-Jul-2010, which came into effect on 23-Jul-2010.
21	Licence varied by notice 1118230, issued on 10-Aug-2010, which came into effect on 10-Aug-2010.