



Your reference: Modification 5 (05\_0037)  
Our reference: DOC16/129111; EF13/3732  
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Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms Natasha Harras

[Natasha.Harras@planning.nsw.gov.au](mailto:Natasha.Harras@planning.nsw.gov.au)

Dear Ms Harras

**Request for Recommended Conditions of Consent  
Cleanaway Waste Oil Processing Facility (formerly Transpacific) 05\_0037 MOD 5**

I refer to your email to the Environment Protection Authority (EPA), dated 11 February 2016, seeking the EPA's comments and any recommended conditions for the above mentioned modification proposal. The proposal is detailed in the report 'Transpacific Refiners Diversification Project 05\_0037 MOD 5 s75W Environmental Assessment' (EA), dated 14 January 2016.

The EPA has reviewed the information provided in the EA and understands the project involves the conversion of currently produced Group I oil to Group II oil and would comprise the following changes:

- Installation of a new piece of plant (polishing system) to further refine Group I oils to the higher specification Group II oils;
- Replacement of the existing burner on the LP Steam Boiler with a multi-fuel burner;
- Extension of the multi-fuel burner stack (Point 2) from 8m to 14m above ground level to reduce wake effects and increase plume dispersion;
- Reuse of process gases, tank vapours and low sulphur light oil as burner fuel in the new burner for the LP steam boiler;
- Installation of additional storage tanks for Group II specification oils to accommodate up to an additional 2.4ML; and
- Expand existing firefighting capability as required, to accommodate the new tank farm and new Oil Polishing process.

The EPA provides the following comment regarding the proposed modification. There are issues related to the air quality impact assessment (AQIA) that need to be addressed before the EPA can finalise its recommended conditions for this project.

**Air Quality**

Odours in the Rutherford area have been an on-going concern for the community for many years. The Cleanaway facility is a potential source of hydrocarbon odours and the EPA's assessment has focussed on

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ensuring that the proposed modifications do not have the potential to result in any detectable decline in air quality in the Rutherford area.

The EPA has reviewed the AQIA and confirms that it has been prepared generally in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales, (DECC, 2005).

The EPA has compared the estimated odour emissions from the project with the emission estimates made in the "*Rutherford Odour Investigation – Part 3 – Modelling Program*" prepared for the EPA by Katestone Environmental Pty Ltd and dated February 2014 (the Katestone Report). The Katestone report also modelled air emissions under similar modelling scenarios. The predicted maximum odour emissions estimations in the Katestone Report for 2008 for the Cleanaway facility are compared to the emissions estimations in the AQIA below (where RIE means the Rutherford Industrial Estate):

| Maximum nose-response-time average percentile (OU) 99 <sup>th</sup> | Receptor Group                                      |                                                  |             |                 |            |                                     |
|---------------------------------------------------------------------|-----------------------------------------------------|--------------------------------------------------|-------------|-----------------|------------|-------------------------------------|
|                                                                     | East of the RIE                                     | East/north-east of RIE, north of New England Hwy | West of RIE | Far east of RIE | Within RIE | At most affected sensitive receiver |
| Katestone Report                                                    | 0.31                                                | 0.1                                              | 0.24        | 0.05            | 0.66       | 0.66                                |
| AQIA (Scenario1/Scenario2)                                          | 1.54 (at north-east boundary of the Cleanaway site) |                                                  |             |                 |            | 0.57/0.54                           |

The estimated odour emissions at the most affected sensitive receiver in the AQIA are slightly lower than the estimations in the Katestone Report, however the estimations for the maximum off-site odour emissions are significantly higher in the AQIA. The EPA recommends that the proponent be requested to provide an explanation as to:

- Why the AQIA estimations for maximum off-site odour are significantly higher in the Katestone report and yet result in lower impacts at sensitive receiver sites under a similar modelling scenarios;
- What are the sources of odour that may be contributing to this increase?
- What actions have been and/or are proposed to minimise odour emissions at the plant (the proponent should demonstrate that all reasonable and feasible mitigation measures have been considered to prevent any increase in odour emissions as a result of this project).

The EPA notes that the modelled Point 2 (3.0 MW boiler) emissions are based on emissions data from a multi-fuel fired boiler at Cleanaway's Narangba Plant, which typically uses light oil with a sulphur content of 0.5%. However, there is no indication in the AQIA as to whether the Narangba facility also uses process off-gases or tank vapours as a fuel feeds.

Further, there is no characterisation of the proposed fuels to be used in the 3.0MW boiler, nor is there any indication of the relative proportions of each fuel type in the total fuel feed. While the EPA notes that low sulphur fuel will be used in the 3.0MW Boiler (0.03%) and that therefore the emission estimations are likely to be conservative, there is no information provided for the sulphur content of the other fuel feeds to demonstrate conservatism. The proponent is requested to provide further information regarding proposed fuel composition and confirm that emissions estimations are based on all fuels proposed to be used in the 3.0 MW boiler.

The EPA also notes that the operating scenarios modelled do not include modelling of worst case emissions, that is, emissions at the licence concentration limits and at the maximum approved operating capacity. The proponent is requested to model impacts under the worst case emission scenario.

If you require any further information regarding this matter please contact Emma Paull on 4908 6828.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'K. Marler', with a stylized, cursive script.

10.3.16

**KAREN MARLER**  
**Head Regional Operations Unit – Hunter**  
**Environment Protection Authority**

