



Your reference: Modification 5 (05_0037)
Our reference: DOC16/169853; EF13/4369
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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

Dear Ms Harras

**Request for Comments on Response to Submissions
Cleanaway Waste Oil Processing Facility (formerly Transpacific) 05_0037 MOD 5**

I refer to your email to the Environment Protection Authority (EPA), dated 16 March 2016, seeking the EPA's comments on the proponents response to submissions (the submission report) provided in support of 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 provides the following comment regarding the submissions report. 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.

1. Estimated Odour Emissions and Predicted Odour Impacts

The EPA raised issues regarding differences in estimated emissions and impacts between the air quality impact assessment (AQIA) in the EA and the report "*Rutherford Odour Investigation – Part 3 – Modelling Program*" prepared for the EPA by Katestone Environmental Pty Ltd and dated February 2014 (the Katestone Report), the sources of odour contributing to the increase in predicted impacts and the minimisation of odour at the plant. The following issues require clarification:

- Source of odour emission rates assumed in the modelling – the assumed odour emission rate of some sources are comparable to those assumed in the Katestone Report and others are three times less than the odour emission rates assumed in the Katestone Report. The proponent must provide further information regarding the estimated odour emissions, including a detailed odour emission inventory and supporting sampling reports.
- Minimisation of odour emissions at the plant – the proponent is proposing to increase the height of the new multi fuel burner stack from 8 metres to 14 metres to increase plume dispersion. There is no demonstration that the proponent has investigated all reasonable and feasible mitigation measures to minimise odour emissions from the project. It is important for the proponent to consider at the outset what additional odour mitigation measures are feasible should odour impacts occur once operational. The proponent must provide the feasible odour mitigation measures that will be implemented should the project result in unacceptable odour impacts.

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2. Fuel Composition

The EPA requested further information regarding the proposed fuel composition and confirmation that emission estimates are based on all fuels proposed to be used in the 3.0 MW boiler. The proponent advised that *'The amount of process gas, light oil and natural gas used would be dependent on a number of factors including the operation capacity and oil composition during day to day operations'*. The proponent recommended that due to data limitations, a validation study be undertaken following commissioning.

The EPA requires information regarding the proposed fuel composition to ensure the boiler can meet the proposed emission limits. The operational variability is noted by the EPA. The proponent must provide a worst case estimate of fuel composition and demonstration that the boiler will comply with the proposed emission limits when burning the 'worst case' fuel.

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

Yours sincerely



6.4.16

KAREN MARLER
Head Regional Operations Unit – Hunter
Environment Protection Authority