



DOC22/291746-5

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Dear Ms Munk

**DA 401-11-2002-i-Mod-14 – Solid Waste Derived Fuel Increase, Storage and Access Changes  
Boral Cement Berrima**

I refer to your email and supporting documentation to the Environment Protection Authority (EPA) on 11 April 2022 seeking comment on an application by Boral Cement Limited (Boral) to modify the above approval. The modification relates to a proposed increase in the use of Solid Waste Derived Fuels (SWDF), construction of additional SWDF storage sheds, creation of an additional site access and an increase in SWDF truck movements at Boral Cement Limited's (Boral) Berrima plant. The EPA regulate the activities at the Berrima premises through Environment Protection Licence (EPL) number 1698.

The EPA has undertaken a review of the information provided by Boral in support of the proposal. The proposal does not appear to change the air emissions from the kiln, as while it is proposed to increase SWDF use, there is no proposed change to the existing feed rate limit. Given air emissions and impacts have been previously assessed by the EPA, the existing air emissions limits and monitoring required by the EPL will remain unchanged.

The EPL currently limits the use of SWDF to 40% of the total fuel load. Separate to the current development proposal, Boral recently sort to increase this to 50% (as per the existing approved development consent). On 19 September 2021 (DOC21/579946-14) the EPA required Boral undertake five additional Proof of Performance (POP) stack emissions tests when using between 40% and 50% SWDF to adequately demonstrate that air emissions at a 50% SWDF feed rate would be acceptable.

Boral recently provided emissions data for three POP stack tests undertaken during a high feed rate of Refuse Derived Fuel (RDF). Boral has advised that it will conduct the other two high feed rate POP emissions stack tests using Wood Waste (WW) and a mixture of WW and RDF. The information will be considered by the EPA in its review of the Boral request to increase the maximum SWDF feed rate from 40% to 50%.

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The EPA notes that the proposal seeks to separate the existing approved 30,000 tonnes per annum AKF-5 fuel (waste tyres) from a proposed combined annual Wood Waste and RDF SWDF limit of 250,000 tonnes per annum.

Should the application be approved, a variation to the licence will be required. Boral should apply for any necessary licence variation through the EPA's eConnect portal.

It should be noted that the figures provided for the dimensions of the proposed new SWDF storage sheds in Table 8 (*Proposed new storage shed dimensions* - Section 3.4 of the SEE (*Storage and Handling Facilities*), appear to have been incorrectly copied from Table 6 (*Approved and proposed truck movements per hour/day*).

If you have questions regarding the above, please phone Matt Fuller on (02) 4224 4100.

Yours sincerely



11 May 2022

**CHRIS KELLY**  
**Unit Head Regulation**