

28 April 2017

NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir / Madam

Re: SSD 15_7195 - Emissions Specifications and Guarantee

INTRODUCTION

This letter documents the air pollutant emissions specifications of the used lead acid battery (ULAB) recycling

This letter should be read in conjunction with the Environmental Impact Statement (EIS) for the Proposal, prepared by JBA Urban Planning, dated August 2016; and the Air Quality Impact Assessment (AQIA) for the Proposal, prepared by Wilkinson Murray Pty Ltd, dated 28 April 2017.

EMISSIONS SPECIFICATIONS AND GUARANTEE

The Manufacturer of the ULAB recycling plant, Boo Yeoung Engineering Co. Ltd, has advised that particulate matter (dust) and lead would be the only significant air pollutants emitted from the plant proposed to be installed under the Proposal. The Manufacturer's emissions specification, including the required efficiency of the scrubber, are summarised in Table 1.

Table 1 Emissions Specification

Expected Contaminants (When mixed in 250 m³/min extraction system air flow)	Concentration (prior to control)	Allowable discharge limit (NSW Limit)	Required prevention efficiency	Concentration of Discharge gas
Dust	21.52 mg/m ³	20 mg/m ³	59.5%	8.73 mg/m ³
Lead compound	10.76 mg/m ³	1 mg/m ³	91.5%	0.9 mg/m ³

Ledox Australia Pty Ltd commits to operating the plant in accordance with the Manufacturer's specifications and advice, thereby ensuring that the stack emissions from the Proposal are in accordance with Table 1.

FUGITIVE EMISSIONS

All potential air pollutants associated with Proposal originate from inside the ULABs. The proposed plant incorporates a spray system that sprays water over the batteries, during the shredding process, at a rate of 1,000 litres per hour. In addition to the spray system, air is drawn from the battery inlet point and directed to the scrubber. At the location where solid lead metal is collected from the plant, heavy fabric bags are tightly fitted over the outlet to ensure that all lead is captured.

A number of other ULAB recycling facilities have significant emissions of lead, SO₂, NO_x, and other air pollutants. These pollutants are primarily released from smelting processes. There are no smelting operations under the Proposal, and therefore, these emissions are not expected to occur for the Proposal.

I trust this information is sufficient. Please contact us if you have any further queries.

Yours faithfully
Ledox Australia Pty Ltd



Jeffrey Park
Managing Director