



Our reference: SF/16/38066
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Manager Industry Assessment
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Susan Fox

Dear Sir/Madam

Proposed Lead Acid Battery Recycling Facility at 10 Lancaster Street, Ingleburn NSW

I refer to our previous correspondence on this proposal.

The EPA's Air Technical Advisory Services Unit (ATASU) has reviewed the Response to EPA Submissions on air quality (Wilkinson Murray, 2017a)¹ and the revised Air Quality Impact Assessment (Wilkinson Murray, 2017b)² (the Assessment). The EPA has referred to the Approved Methods for Modelling and Assessment of Air Pollutants 2005 (as the proposal was submitted prior to 2017) for the purposes of the review.

The Response to Submissions advises:

- Emission guarantees have been obtained for the proposal;
- The updated Assessment presents dispersion modelling results based on the emissions guarantee;
- That the battery recycling machinery is essentially a 'closed system', with openings where the batteries enter the plant and the point where solid lead is ejected from the plant; and
- Acid from the batteries will be neutralised and stored in a tank prior to removal from site by waste contractor, hence the vapour return line is no longer proposed.

The Assessment:

- Predicts compliance with the impact assessment criteria for lead at the receptors assessed;
- Predicts compliance with the impact assessment criteria for PM₁₀ at the receptors assessed;
- Predicts exceedances of the referenced ambient air quality NEPM standard for PM_{2.5} over a 24 hour and annual averaging period.

¹ Wilkinson Murray, 2017a – Letter subject: Ingleburn Batteries – Responses to EPA Submissions (Air Quality), dated 30 April 2017.

² Wilkinson Murray, 2017 b – Battery Recycling Facility Air Quality Impact Assessment, dated April 2017.

The EPA notes:

- Exceedances of the 24-hour average NEPM standard for all industrial receptors are predicted. A predicted increment of 1.6 ug/m^3 , which is ~ 6 % of the predicted cumulative ground level concentration of 26.5 ug/m^3 is reported.
- The Assessment predicts ground level concentrations at the 24-hour average NEPM standard for the residential receptors assessed. A predicted increment of $< 0.1 \text{ ug/m}^3$, which is $< 1 \%$ of the predicted cumulative ground level concentration of 25 ug/m^3 is reported.
- Exceedances of the annual average NEPM standard for all receptors assessed. It is noted that the Assessment adopts a background concentration of 8.5 ug/m^3 which is above the NEPM standard. A predicted increment of 0.5 ug/m^3 , which is ~6 % of the predicted ground level concentration of 9 ug/m^3 at industrial receptors, and a predicted increment of $< 0.1 \text{ ug/m}^3$ which $< 1 \%$ of the predicted cumulative ground level concentration at residential receptors.

The EPA notes that the Assessment states that “the emissions specification is based on the incorporation of a wet scrubber at the minimum extraction efficiencies of 92% and 60% for lead and particulate matter”. The EPA advise that emission controls should be able to achieve a minimum control efficiency of 90% for particulate matter, in line with contemporary emission performances.

The EPA recommends that the proponent provide additional information to demonstrate that the wet scrubber will achieve a control efficiency that is representative of contemporary emission control performances.

Should you require further information regarding this matter please contact Jeevan Jacob on 02 9995 5902.

Yours sincerely



Mark Carey
A/Head Hazardous Materials