

Our reference: SF16/38066
DOC17/454917

Manager Industry Assessment
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Susan Fox

Dear Ms Fox,

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

I refer to EPA's previous correspondence, Ref No.DOC17/301826, in relation to this proposal.

The EPA has requested the proponent to provide additional information to demonstrate that the wet scrubber will achieve a control efficiency that is representative of contemporary emission control performances. The additional information was requested as the Air Quality Impact Assessment (Wilkinson Murray, 2017)¹ stated the emission specification for the wet scrubber would achieve a 60 % control efficiencies for particulate matter.

The proponent has supplied a letter outlining the wet scrubber will achieve a 90% control efficiency. The EPA considers this adequately addresses the requested information.

However, the EPA recommends that if the project approval is granted the following conditions be incorporated within the consent.

Recommended Conditions of Consent

1. The wet scrubber must be designed, constructed, operated and maintained to achieve a minimum control efficiency of 90 % for total suspended particulates and lead.
2. The proponent must prepare and implement an Air Quality Management Plan (AQMP) for the site. The AQMP must include the following information, as a minimum:
 - Key performance indicators for emissions controls and management measures;
 - Location, frequency and duration of monitoring;
 - Record keeping;
 - Response mechanisms;
 - Responsibilities for demonstrating and reporting achievement of key performance indicators; and
 - Compliance reporting

1. Concentration Limits

¹ Wilkinson Murray, 2017 b – Battery Recycling Facility Air Quality Impact Assessment, dated April 2017.

Point 1 – Scrubber discharge

Pollutant	Units of measure	100 percentile concentration limit	Reference Conditions	Oxygen correction	Averaging Period
Solid Particles	milligrams per cubic metre	10	Dry, 273 K, 101.3 kPa		1 hour, or the minimum sampling period specified in the relevant test method
Type 1 and Type 2 substances in aggregate	milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		1 hour, or the minimum sampling period specified in the relevant test method
Lead	milligrams per cubic metre	0.9	Dry, 273 K, 101.3 kPa		1 hour, or the minimum sampling period specified in the relevant test method
Sulfuric acid mist and sulfur trioxide	milligrams per cubic metre	1	Dry, 273 K, 101.3 kPa		1 hour, or the minimum sampling period specified in the relevant test method

2. Monitoring Requirements

Pollutant	Units of Measure	Frequency	Test Method
Solid Particles	milligrams per cubic metre	Special frequency 1	TM-15
Type 1 and 2 substances in aggregate	milligrams per cubic metre	Special frequency 1	TM-12, TM-13 & TM-14
Lead	milligrams per cubic metre	Special frequency 1	TM-12, TM-13 & TM-14
Sulfuric acid mist and sulfur trioxide	milligrams per cubic metre	Special frequency 1	TM-3

Special Frequency 1 means two rounds of post commissioning testing and annual thereafter.

3. Post Commissioning Tests

- a) Within six months of post commissioning the licensee must submit a post commissioning test report to the EPA. The post commissioning report must include:
- The analytical results of two (2) round of post commissioning sampling for those pollutants tabulated in condition 1 above;

- A comparison of the analytical results obtained against the prescribed limits contained in the *Protection of the Environment Operations (Clean Air) Regulation 2010*, and the limits tabulated in condition 1 above;
- A comparison of the emission rates calculated from post commissioning testing with emission rates contained in the Air Quality Impact Assessment (Wilkinson Murray, 2017 – *Battery Recycling Facility Air Quality Impact Assessment, dated April 2017*) provided for project approval. Where emission rates estimated from post commissioning tests are higher than those contained in the Air Quality Impact Assessment, a revised Air Quality Impact Assessment must also be provided.
- Concentration limits for lead and sulphuric acid mist will be revised based on results of post commission testing.

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

Yours Sincerely



5 September 2017

Erwin Benker

A/Manager Hazardous Materials

Environment Protection Authority