

13 December 2016

Sheelagh Laguna
Environmental Planning Officer
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Laguna

Pymore Battery Recycling Facility, Kurri Kurri (SSD 16_7520)

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning & Infrastructure web site in relation to the Pymore Battery Recycling Facility, Kurri Kurri (SSD 16_7520).

Pymore Recyclers International Pty Ltd proposes to develop and operate a used lead-acid battery (ULAB) recycling facility. The project would recycle up to 60,000 tonnes per annum of ULABs. The ULAB recycling plant would have four main processes – crushing, screening and separation; desulphurisation; crystallisation; and lead extraction. The intention is that the entire process converts a ULAB into materials which are recycled for use in new products. Lead and plastics recovered are used in the production of new batteries. Sodium sulphate crystals, a by-product of ULAB recycling, can be readily used in other industries.

Hunter New England Population Health (HNEPH) has reviewed the Environmental Impact Statement (EIS) Report and associated documentation, paying particular attention to the management of air quality, noise, soil, water and other issues which may have an impact on human health.

Air Quality

The Air Quality Impact Assessment (AQIA) determined that the Battery Recycling Facility has the potential to emit a range of air pollutants including dust, particulate matter (PM10 and PM 2.5), lead, nitrogen dioxide, sulphur dioxide, sulphur trioxide and sulphuric acid mist, volatile organic compounds, arsenic, dioxins and furans. The EIS identifies the emission control technology to be implemented to manage these pollutants. HNEPH understands that emission limits will be provided by the Environmental Protection License. The EIS assesses a range of predicted emissions including particulates and toxics as described in Tables 8-2; 8-3; 8-4; 8-5 and 8-6 respectively of the AQIA. The predictions all fall well below NSW EPA criteria. The process has been used in other facilities and the

Hunter New England Local Health District
ABN 63 598 010 203

Hunter New England Population Health
Locked Bag 10
Wallsend NSW 2287
Phone (02) 4924 6477 Fax (02) 4924 6490
Email HNELHD-PHENquiries@hnehealth.nsw.gov.au
www.hnehealth.nsw.gov.au/hneph

emission profile is well understood. There appears to be minimal incremental air impact on the surrounding community, however, it will be important to factor in potential emissions from the proposed Thermal Waste Processing Facility at Weston Aluminium and continue to decrease the emissions to air.

During the construction phase, dust management strategies should be implemented to minimise health impacts to the surrounding community.

Noise

Environmental noise can have negative impacts on human health and well-being. Receivers in the locality surrounding the industrial area are primarily residential and commercial. During Construction of the ULAB Recycling Facility, noise modelling indicates there is unlikely to be significant exceedances. Once the Facility is built, noise emissions are not anticipated to significantly exceed guideline levels. Noise management measures as identified in the EIS such as the enclosed acoustic chamber in the crushing plant are to be utilised to ensure there are no exceedances.

In order to reduce sleep disturbance truck movements should be limited to between the hours of 7am to 10pm, since sections of the vehicle route are still proximal to residences.

Surface Water

The operator should ensure there is minimal impact from the proposed development on the water quality of surrounding natural waterways, particularly from stormwater runoff. All wash down water and water collected in sumps is to be separated from the stormwater system. The stormwater control system should be monitored for potential contaminants.

Soil and Groundwater

HNEPH understands that the land to be developed is heavily disturbed with disused industrial equipment and fill from other sites. Some contaminants such as petroleum hydrocarbon compounds below guideline criteria were identified on site. Construction on the land is to occur so that the fill is managed to minimise impact on surrounding areas. Soil contamination with ULAB materials could occur as a result of failure of containment processes such as spills and stormwater ingress. Containment and spill response planning should be part of the site management and emergency response plan.

Lead

Battery processing will result in significant lead dust levels. Compliance measures and engineering controls as identified in the EIS should be strictly adhered to so that the risk of lead exposure to employees and their close household contacts is minimised.

If you require any further information please contact Allison Garrett, Environmental Health Officer on (02) 49246476

Yours Sincerely



Dr David Durrheim

**Service Director- Health Protection
Hunter New England Population Health**