DOC18/495649

Ms Kate Masters
Senior Planning Officer – Waste
Department of Environment & Planning
PO Box 39
SYDNEY NSW 2001

16 August 2018

Dear Ms Masters

Woodlawn Resource Recovery Facility (MP 06_0239 MOD 2 and MP 10_0012 MOD 3) Modification

I am writing in response to your email to the Environment Protection Authority (EPA) dated 17 July 2018, and the formal referral dated 23 July 2018, seeking comment on Veolia Environmental Services (Australia) Pty Ltd's application to modify the Woodlawn Mechanical Biological Treatment (MBT) development (MP 06_0239) to construct and operate a Resource Recovery Facility to process up to 50,000 tonnes per annum (tpa) of residual general solid waste (non-putrescible) from the MBT to produce a solid recovered fuel (SRF).

The EPA understands that the SRF produced at the facility would be transported to the Crisps Creek Intermodal Facility (IMF) where it would be railed to Port Botany and utilised either locally or internationally. In order to facilitate the transfer of waste from the Crisps Creek IMF to Sydney a modification to MP 10_0012 is also required.

Additional information required

We have reviewed the documentation provided and require additional information from the proponent in order to properly assess the proposal. Specifically, additional information is required to address the following elements of the *NSW Energy from Waste Policy Statement* (the Policy Statement).

1. **Management of hazardous materials**

   The proponent states that contaminants such as batteries, light bulbs, electrical waste and other hazardous waste are removed prior to waste being processed at the MBT, but does not explain how this is achieved or what its effectiveness is. The proponent should provide more detail on (i) the characterisation of the hazardous material content of incoming waste streams and (ii) the methods, procedures, and processes that will be put in place to manage this hazardous material content.

2. **Halogenated substance content of the fuel**

   The proponent has not provided any information on what the halogenated substance content of the SRF will be. The application states that a typical specification for SRF material is

<0.20% m/m Cl and <0.25% m/m F, Br and I, but it is not clear if and how the SRF material will meet these specifications.

Further considerations

In addition to the information requested above, Section 3.5.4 of the application states that it is ultimately the energy recovery facility's responsibility to meet the technical criteria and the thermal efficiency criteria outlined in the Policy Statement. In practice, the responsibility of meeting the technical and thermal efficiency criteria, especially the air emissions requirements, is shared, because the supplier of the SRF has a responsibility to ensure that the fuel they supply is fit for purpose and free from hazardous substances. This responsibility is typically managed through the development of specifications between the producer of the SRF and the facility where it will be used to generate energy.

The proponent has provided an example of a specification for an SRF to be used in a cement kiln, but it is not clear whether the proposed process would be capable of meeting this specification. An example of a SRF specification for a purpose-built energy from waste facility has not been provided, even though it has been identified as a possible end user of the SRF.

We recommend that the proponent be asked to provide a real-world example of a SRF specification for a purpose-built energy from waste facility, and to explain whether the proposed SRF will be able to meet either or both of these specifications. The proponent should also identify specific end users of the SRF and confirm what their specifications will be. Otherwise, there is a risk that the facility may be built and may not be able to meet the specifications of the receiving facility(s).

Finally, given that the application suggests that the SRF may be used in cement kilns in NSW, it should be noted that many cement kilns may not be immediately capable of meeting the technical criteria and/or the thermal efficiency criteria, and that significant work may be required to allow the use of the SRF/RDF in a cement kiln.

If you have any questions or would like to further discuss this matter, please contact Nick Feneley on (02) 4224 4144.

Yours sincerely

MEGAN WHELAN
Unit Head Waste Compliance
Environment Protection Authority