



Our reference: Contact: EF13/4266 DOC13/95497 Christopher Burton 02 6022 0609

The Director Infrastructure Projects NSW Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001 Department of Planning Fiscalized 2 9 JAN 2014

Scanning Room

Attention:

Toby Philp

Dear Mr Snow

## Re Uranquinty Power Station - DA 31-2-2004i-MOD11

I refer to the modification application and accompanying assessment provided for the Origin Energy Pty Ltd Uranquinty Power Station, received by the Environment Protection Authority (EPA) on 18 December 2013.

The EPA has reviewed the information provided in support of the application to modify Development Consent DA 31-2-2004i. In regard to the requirement to undertake annual stack testing the EPA considers the requirement could be removed altogether rather than extended from annual to 5 yearly testing on the basis that key operating parameters such as temperature, oxygen and carbon dioxide are measured and recorded during operation of the power station.

The EPA has also carefully considered Origin Energy's request to remove the requirement to continuously monitor oxide of nitrogen gas (NOx) emissions from DA 31-2-2004i. Continuous monitoring of NOx is utilized internationally on large gas-fired power plants to ensure performance measures are maintained to achieve contemporary air emission standards. The technology used for continuous NOx monitoring is readily available and considered both a robust and cost-effective management and monitoring tool at similar sized gas-fired power plants. As continuous monitoring provides real time data, it captures events unlikely to be detected by periodic sampling techniques. It should be noted there have been several occasions in the past where continuous monitoring has identified events that would not have been detected using the proposed alternative of six monthly monitoring utilizing a portable NOx analyzer.

On this basis and as discussed with Origin Energy representatives in a telephone conversation on 23 January 2014 the EPA is unable to support the proposed modification to remove the requirement for continuous environmental monitoring of NOx emissions at the Uranquinty facility. Continuous monitoring provides the operator with the real time process analysis and control necessary to meet industry best practice performance measures. It also provides valuable information to the community about the ongoing environmental performance of industry.

If you have any questions, or wish to discuss this matter further please contact Christopher Burton by telephoning on 02 6022 0609.

Yours sincerely

BRIAN WILD 23 January 2014
Acting Manager South West

**Environment Protection Authority**