

24 October 2016

Emma Barnet  
Environmental Planning Officer  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Barnet

**Modification to Weston Aluminium Dross Recycling Facility - MOD 11 (SSD 86-04-01 Mod 11) & Modification 9 to Weston Aluminium Dross Recycling Facility - (SSD 10397 of 1995 MOD 9)**

I refer to the Environmental Assessment (EA) exhibited on the NSW Department of Planning & Environment web site in relation to the Quarantine Waste Modification for Weston Aluminium Dross Recycling Plant.

Weston Aluminium is seeking to trial the processing of up to 1,000 tonnes of quarantine waste over a two year period. The company seeks modifications to its development consent and a variation to its Environmental Protection License (EPL). Quarantine Wastes would undergo thermal treatment in conjunction with or in isolation from existing plant feedstock. The trial would utilise plant facilities already on site.

Hunter New England Population Health (HNEPH) has reviewed the Environmental Assessment Report and provides the following points to be considered in the approval process for this project.

**Air Quality**

The EA determined that quarantine waste processing has the potential to emit a range of air pollutants including particulate matter (PM<sub>2.5</sub>, PM<sub>10</sub> and total suspended particulate), carbon dioxide, carbon monoxide, metals, dioxins and furans, polycyclic aromatic hydrocarbons, oxides of nitrogen, oxides of sulphur, and volatile organic compounds. HNEPH is of the understanding that EPA licensing will consider the likely chemical composition of the feedstock and limit potential emissions of these substances.

The EA suggests that monitoring of emission parameters are conducted during the trial on a six monthly basis. Air emissions will vary depending on the type of waste being processed. In the situation of plastic packaging, substantial dioxin levels may result from incineration. Data from previous Weston Aluminium emission performance indicate dioxin

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levels are already at 50 percent of the current limit of 0.1 ng/m<sup>3</sup>. Cumulative emissions should be monitored to ensure there are no exceedances. HNEPH recommends that air quality monitoring for emissions mentioned in Paragraph 1 occur at times that the relevant quarantine waste streams are being thermally processed. Testing in this manner would provide appropriate data on the efficiency of the system in dealing with quarantine waste. Further, real time monitoring of particulate matter, oxides of nitrogen and sulphur and hydrogen chloride should continue at the stack to be utilised for this trial.

Should any exceedances of the Environmental Protection Licence limits occur, then the processing should be ceased and the trial reviewed.

### **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. Noise emitted by the Weston Aluminium Plant is not anticipated to increase significantly in the trial since existing infrastructure will be used. Heavy vehicle movements should continue to be limited to between the hours of 7am to 10pm, following the route proposed in the EA.

### **Surface Water, Soil and Groundwater**

The operator should ensure there is minimal impact from the proposed development on the water quality of surrounding natural waterways, particularly from stormwater runoff.

The EA indicates waste awaiting processing and ash residue stockpiles would be contained and stored so that the materials are not affected by stormwater ingress which could lead to inundation of surrounding water sources and soils. Testing of water quality within the stormwater management system should continue.

Consultation with the EPA should occur as to the appropriate chemical testing of the resultant ash and the results used to determine appropriate reuse or disposal methods.

HNEPH recommends that the current safety management and spill response plans be updated to reflect the new materials being processed on site.

If you require any further information please contact Allison Garrett, Environmental Health Officer on 4924 6476.

Yours sincerely,



Dr David Durrheim  
**Service Director - Health Protection**  
**Hunter New England Population Health**