

Hi Susan

Please see below EPA's comments. An EPA letter detailing this can be sent later.

Issues where additional information requested

1. The proponent provide information to demonstrate compliance with the *Protection of the Environment Operation (Clean Air) Regulation 2010* (the Clean Air Regulation) (for Chlorine).
2. Demonstrate that the proposal can be designed and operated to comply with the impact assessment criteria contained in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW* (the Approved Methods) for Chlorine.

Information reviewed

¹SLR (2017) – *Toxfree AAN Plant – Air Quality Impact Assessment Additional Information Request*, dated 15th September 2017.

²TAPC (2018)- Letter from Total Air Pollution Control Pty Ltd to Toxfree dated 22nd February 2018.

Comments and Advice

SLR (2017)¹ advises on the maximum allowable stack discharge concentrations to achieve compliance with the impact assessment criteria contained in *the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (the Approved Methods). SLR (2017) advises a maximum discharge concentration of 1,500 mg/Nm³ for Chlorine(Cl₂) to achieve compliance with the impact assessment criteria.

TAPC (2018)² provides additional information on the proposed scrubber to treat chlorine and sulphur dioxide emissions. TAPC (2018) advises that “a removal efficiency of over 99% for both Cl₂ and SO₂ can be guaranteed through the use of TAPC technology, for which the Clean Air Regulation Emission limits of 200 mg/m³ for Cl₂ and 1,000 mg/m³ for SO₂ will be comfortably met in the gas discharged from the packed tower scrubber”.

EPA advises that:

- The stack discharge concentration in TAPC (2018) for Chlorine is an order of magnitude lower than the discharge concentration outlined in SLR (2017) to achieve compliance with the Impact Assessment Criteria contained in the Approved Methods. Hence the additional information adequately demonstrates compliance with the impact assessment criteria for Chlorine.
- TAPC (2018) advises that the proposed scrubber will meet the Clean Air Regulation limit for Chlorine.
- Post commissioning stack sampling be conducted to confirm performance of the proposed scrubber once operational. EPA can then make a decision on including emission limits on the Environment Protection Licence.
- The additional information adequately addresses the remaining issues.

Recommendation

EPA recommend the following post commissioning condition:

Post commissioning report

Within 6 months of post commissioning the licensee must submit a post commissioning test report to the EPA. The post commissioning report must include:

- a) The analytical results of two (2) rounds of post commissioning sampling for Sulphur Dioxide and Chlorine. The sampling must be

conducted in accordance with the *Approved Methods for Sampling and Analysis of Air Pollutants in NSW*;

- b) A comparison of the analytical results obtained against the prescribed limits contained in the *Protection of the Environment Operations (Clean Air) Regulation 2010*; and
- c) A comparison of the analytical results with emission concentrations, emission rates and discharge parameters contained in SLR report - *Toxfree AAN Plant – Air Quality Impact Assessment Additional Information Request*, dated 15th September 2017.

The EPA may amend the Environment Protection Licence upon review of the post commissioning test report.

Regards

Jeevan Jacob