NSW EPA

Our reference: EF13/2639:DOC14/121921-01:GN
Contact: Greg Newman, (02) 4224 4100

Department of Planning and Environment
(Attention: Kerry Hamann)
GPO Box 39
SYDNEY NSW 2001

Dear Madam

SUBMISSION ON PROPOSED MODIFICATIONS
WASTE GAS CLEANING PLANT (MOD 2) - SINTER PLANT UPGRADE PROJECT (MOD 1)
BLUESCOPE STEEL PORT KEMBLA STEELWORKS

I am writing in regard to the above modification applications referred to the Environment Protection Authority (EPA) on 2 April 2014 by the Department of Planning and Environment (DPE). EPA provides comments on the Waste Gas Cleaning Plant (Attachment 1) and the Sinter Plant Upgrade Project (Attachment 2).

Broadly, EPA does not object to the proponent's proposed modifications, but suggests DPE consider retaining, and possibly modifying, Conditions 6.25 to 6.26 for the Waste Gas Cleaning Plant per the attached comments.

The EPA regulates both these projects under Environment Protection Licence Number 6092. The EPA can vary this licence by way of notice should new information become available on emissions from the premises. In exercising these licensing functions, the EPA takes into account the matters listed under Section 45 of the Protection of the Environment Operations Act 1997.

EPA is happy to meet to discuss this submission. Please contact Mr Greg Newman on (02) 4224 4100 to organise this discussion.

Yours sincerely

1/8/14

PETER BLOEM
Manager Illawarra
Environment Protection Authority

Att: Attachments 1 and 2

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Attachment 1: Sinter Plant Was Gas Cleaning Plant

Condition 4.6 – 4.7 Noise Monitoring - verification monitoring was completed and noise limits are listed under Environment Protection Licence (EPL) Condition L6.4. Note the EPL does not require routine noise monitoring. EPA does not object to the proponent's proposal.

Condition 4.8 – 4.9 Construction Phase (dust) Condition. EPA does not object to the proponent's proposal.

Condition 4.12 – 4.13 (Dust) These conditions are consistent with EPL Condition O3. EPA does not object to the proponent's proposal.

Condition 4.15 (Start-up Emission Report) has been submitted and EPA does not object to the proponent's proposal.

Condition 4.17 (Discharge Limits) – Limits and monitoring requirements are the same as EPL Condition L3.4. EPA does not object to the proponent's proposal.

Condition 4.18 (Mass Emissions) – same as Condition L2.4 on the EPL. EPA does not object to the proponent's proposal.

Condition 4.19 – (NOx and SOx Loads) – these specific mass limits have been removed from the EPL. EPA relies on the EPL (Condition L3.4) concentration limits to assess compliance. Further modelling work has been undertaken on this emission point by BSL Pollution Reduction Program (PRP) 131). EPA does not object to the proponent's proposal.

Condition 4.20 Sulfur Rich Gas Management is the same as Condition O4.19 on the EPL. EPA does not object to the proponent's proposal.

Condition 4.21, 4.26 and 4.27 (Sulfur Rich Gas Pipeline to Incitec). This option was not pursued as part of the development and EPA does not object to the proponent's proposal.

Condition 4.22 - 4.24 - EPL Condition O4.19 broadly addresses this condition. EPA does not object to the proponent's proposal.

Condition 4.25 (Sulfur Rich Gas Venting) – this condition is the same as EPL Condition O4.20. EPA does not object to the proponent's proposal

Condition 4.28 (Wastewater Treatment Plant) and 4.29 (Blowdown Water Reuse) – These options were not pursued as part of the development and EPA does not object to the proponent's proposal.

Condition 4.30 (Pollute Waters) – is the same as EPL Condition L1. EPA does not object to the proponent's proposal.

Condition 4.31 (Iron Making East Drain Limits) – are the same as EPL Condition L3.5. EPA does not object to the proponent's proposal.

Condition 4.32 (Erosion and sediment Control), 4.33 - 4.34 (Stormwater Management), 4.35 – 4.36 (Soil Remediation), and Condition 4.38 (Spillage Response) – construction phase conditions. EPA does not object to the proponent's proposal.

Condition 4.44 (Non Liquid Waste Minimisation Strategy) – Completed under EPL through PRP 114 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 4.50 (Sediment) - While the approval condition is more specific, this condition is consistent with EPL Condition O3. EPA does not object to the proponent's proposal.

Condition 6.3 – 6.4 (Monitoring) – requirements listed in EPL Condition M2 monitoring requirements. EPA does not object to the proponent's proposal.

Condition 6.5 - 6.7 (Load Based Licensing) – requirements listed in EPL Conditions L2 and R1. EPA does not object to the proponent's proposal.

Condition 6.8 – 6.9 (Air Quality Monitoring) – requirements listed in EPL Condition M2 (Point 107). EPA does not object to the proponent's proposal.

Condition 6.10 (Water Quality Monitoring) – requirements listed in EPL Condition M2.4. This approval condition has since been reviewed by the EPA (pollutants/frequency). EPA does not object to the proponent's proposal.

Condition 6.11 (PRP 53) – PRP 53 was completed in December 2002 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.13 – 6.14 (Effluent Characterisation Program) – These requirements were addressed under EPL PRP 112 which was completed in December 2002 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.15 – 6.17 (Dioxin and Solid Particle Monitoring) – Requirements were investigated under PRP 104 which was completed in March 2004 and now listed in Condition G2 on the EPL. Monitoring is also required under Condition M2 (Point 107). EPA does not object to the proponent's proposal.

Condition 6.18 (Visibility Monitoring) – This condition is not covered by EPL Condition M9.2 but is covered by EPL Condition O4.18. EPA does not object to the proponent's proposal.

Condition 6.19 – 6.21 (Mass Emission Monitoring) - PRP 106 was completed in December 2007 and now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.22 (Monitoring Requirements) – Requirements listed in EPL Condition M2 monitoring requirements. EPA does not object to the proponent's proposal.

Condition 6.23 – 6.24 (Dioxin Destruction) - Requirements were addressed through PRP 109 which was completed in December 2009 and now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.25 – 6.26 (Consultation with the Departments of Health and Agriculture) Gypsum is presently used in cement manufacture and not fertiliser production. This use could change in the future thus EPA suggests retaining these conditions. The conditions could be modified to reflect the current situation and then activated if fertilizer use is adopted in the future.

Condition 6.27 – 6.28 (Sinter Plant ESP Dust Monitoring Program) – Requirements were addressed through PRP 108 which was completed in December 2004 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.29 – 6.30 (Radionuclides Monitoring Program) – Requirements were addressed through PRP 109 which was completed in December 2009 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 6.31 (Noise Verification Program) – Requirements were addressed through PRP 105 which was completed in April 2004 and is now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 7.1 (Annual Return) – Requirements listed in EPL Condition R1. EPA does not object to the proponent's proposal.

Condition 7.2 – 7.3 (Reporting Conditions) – These conditions were completed. EPA does not object to the proponent's proposal.

Condition 7.4 (Annual Environmental Management Report) - EPA does not object to the proponent's proposal.

Attachment 2: Ore Preparation Upgrade Project

Conditions 2.2 – 2.5 (Dust Emissions) – While the approval conditions are more specific, these conditions are consistent with Environment Protection Licence (EPL) Condition O3. EPA does not object to the proponent's proposal.

Condition 2.6 (Discharge Limits) – Limits and monitoring requirements are the same as EPL condition. EPA does not object to the proponent's proposal.

Condition 2.7 (Sinter Cooler Waste Gases) – Investigation completed under PRP Number 128 and now listed in Condition G2 on the EPL. EPA does not object to the proponent's proposal.

Condition 2.8 Construction Noise – Construction phase condition. EPA does not object to the proponent's proposal.

Condition 2.9 – 2.10 Operational Noise – Conditions are the same as EPL Condition L6. EPA does not object to the proponent's proposal.

Condition 2.11 Surface Water Quality - Construction phase condition. EPA does not object to the proponent's proposal.

Condition 2.12 Pollution of Waters - Condition is the same as EPL Condition L1. EPA does not object to the proponent's proposal.

Condition 2.13 – 2.15 Waste Generation and Management - these approval conditions are broadly consistent with EPL Condition L5. EPA does not object to the proponent's proposal.

Condition 3.1 – 3.2 Air Quality Monitoring – verification monitoring has been completed and routine monitoring (quarterly) in required under EPL Condition M2.2. EPA does not object to the proponent's proposal.

Condition 3.3 – 3.4 Noise Monitoring - verification monitoring has been completed and noise limits are specified under EPL Condition L6.4. Note the EPL does not require routine noise monitoring. EPA does not object to the proponent's proposal.

Condition 5.3 (Complaints) – EPL Condition M7, M8, R1 require recording and reporting of community complaints. EPA does not object to the proponent's proposal.

Condition 6.1 - 6.2 CEMP – Construction Phase Condition. EPA does not object to the proponent's proposal.