



Your reference: 07_0161 MOD 2
Our reference: EF13/3853, DOC14/212948-01
Contact: Dr. Sandie Jones/Tristan Johnston (02) 62297002

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Attention: Mr Ashley Cheong

Dear Mr Cheong

EPA Response - Exhibition of Modification Request for Dongwha Timbers, 1 Sandy Lane Bombala (07_0161 MOD 2)

Thank you for your email to the Environment Protection Authority (EPA) dated 24 September 2014 inviting submissions, including advice on recommended conditions, for the above proposal relating to the installation of a new wood-fired boiler at Dongwha Timbers sawmill facility at 1 Sandy Lane Bombala.

The EPA has reviewed the provided Environmental Assessment (EA), and included Air Quality Assessment (AQA) and provides the following comments for your consideration:

Overall

The EA is built on the premise that the actual model, size, final capacity and environmental performance of the boiler will be finalised after receiving consent for the modification. This position by the proponent has made it impossible for the EPA to determine whether the environmental performance of the boiler can be achieved. The EPA does not consider it appropriate to approve the boiler, without certainty that a boiler that can achieve a sufficient standard of environmental performance actually exists or can be modified to achieve the required environmental emission standards. More specific detail is included below.

Air

The EPA considers that AQA it is inadequate. The AQA does not contain adequate information on the proposed boiler, the fuel it will use, how it will be operated or any emission control equipment. Without this information, the EPA is unable to fully assess the impacts of the proposal and therefore cannot recommend licence conditions at this time.

The AQA does not meet the requirements of the "*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*" (approved methods). Please see **Attachment 1 - Outstanding issues with Air Quality Assessment for Dongwha modified plant upgrade** for details of the issues identified and the information required for the EPA to undertake an appropriate assessment.

Noise

Regarding noise during operation – the EPA considers the EIS does not contain adequate information on the proposed boiler, the sound power level that is likely to be emitted, how it will be operated or sufficient detail regarding at source noise mitigation measures that will be employed to minimise impact on receivers. There is insufficient information to fully assess the impacts of the proposal and the EPA therefore cannot recommend license conditions at this stage.

Regarding noise during construction – the EPA requires that any activity approved to be undertaken at the premises be conducted in accordance with the Interim Construction Noise Guidelines (DECC, 2009) and the objectives of the Industrial Noise Policy (EPA, 1999)

Waste

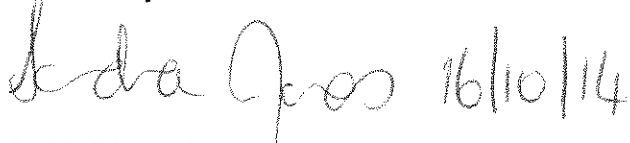
The EPA considers that the EA does not provide sufficient detail regarding the potential waste streams that may be created as a result of the installation of the new wood-fired boiler. The EA states that the *"the proposal will result in additional fly-ash or soot..."* (s 5.7.2, p44) however the quantity of the increase and management strategies to deal with that waste is unclear. Additionally, the EA fails to identify whether any liquid waste will be generated by the proposal (e.g. boiler waste water) and if so, how this waste would be managed. Without this information the EPA is unable to fully assess the impacts of the proposal and therefore cannot recommend any licence conditions at this time.

Licence Variation

The EPA notes that Dongwha Timbers currently holds an Environment Protection Licence (EPL 11205) for the Bombala Sawmill. Following approval of the proposed modification, the monitoring conditions for the current licence will need to be updated. Prior to the installation of the new boiler, the licensee will need to lodge a licence variation application with the EPA. The appropriate application form, titled 'Licence variation application - premises can be downloaded from the following web link:
<http://www.epa.nsw.gov.au/licensing/licenceforms.htm>

If you have any queries or wish to discuss this matter further, please contact Dr. Sandie Jones, Head of Operations – South East Region or Tristan Johnston, Regional Operations Officer on (02) 62297002 or via email to queanbeyan@epa.nsw.gov.au

Yours sincerely



DR SANDIE JONES
Head of Operations, South East Region
Environment Protection Authority

Attachment 1

Outstanding issues with Air Quality Assessment for Dongwha modified plant upgrade

DOC14/226092

Comments

The Environmental Assessment (EA) variously refers to the proposed wood-fired boiler as 18MW or 20MW. The EA should be clear regarding the size of the boiler.

Modelling has been conducted using AUSPLUME and winds generated by TAPM. While this approach is acceptable, it has been done poorly as:

- There is no justification for the choice of 2009 as the modelled year;
- Grid level specification in Table 2 in Appendix C is inconsistent; and
- There are errors in the presentation of model results – concentrations of PM_{2.5} greater than that of PM₁₀.

Of most significance is the emissions used in the modelling. The modelling was conducted assuming emissions at the class 6 limits, even though Appendix A of the Air Quality Assessment (AQA) lists a greater emission value for carbon monoxide (5.56 g/s where class 6 would be 2.697 g/s). This is not an acceptable approach for determining emissions for modelling.

The 'Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales' (approved methods) set out processes for estimating emissions based on the characteristics of the fuel and accounting for the impact of pollution control equipment. Details of boiler design are needed to provide adequate emissions estimation, including manufacturer's specifications and test results from similar installations.

The AQA adopts a criterion for 24-hour PM_{2.5} of 50 µg/m³ with no explanation. New South Wales has not established a 24-hour guideline concentration for PM_{2.5}. Values are available from international jurisdictions, and the National Environment Protection (ambient air quality) Measure sets 25 µg/m³ as an advisory guideline for 24-hour PM_{2.5}. Any criterion chosen needs to be less than that for PM₁₀.

Information required

- Confirmation of the size of the proposed wood-fired boiler.
- Examination of representative meteorological data to determine representative years for modelling impacts and justification of this choice.
- Emissions estimates for the proposed wood-fired boiler consistent with the provisions of Section 9 of the Approved Methods. Emissions estimation needs to be based on the performance of the boiler to be installed for the fuel to be used using manufacturer's specifications and any available measurements of operational emissions.
- Modelling of the impact of the proposed wood-fired boiler using emissions estimates representing operation as noted above, and representative meteorology.
- Careful presentation of model parameters and results.

