NSW EPA

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

Planning Officer - Industry, Key Sites and Social Projects
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Ashley Cheong

Dear Mr Cheong

EPA Response – Submissions response Modification Request for Dongwha Timbers, 1 Sandy Lane Bombala (07_0161 MOD 2)

Thank you for your email to the Environment Protection Authority (EPA) providing the submissions response from Dongwha Timbers 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 additional information and provides the following comments for your consideration:

Noise

The EPA recommends that the noise limits prescribed in the existing consent remain in place. Additionally the EPA recommends that a noise validation report is prepared within 3 months of the commencement of the operation of the new boiler.

The EPA requires that any construction activity 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)

Air

The EPA previously expressed concerns regarding the air quality assessment (AQA), advising that it did not meet the requirements of the '*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*' (approved methods). The response from Dongwha Timbers has adequately addressed the issues raised.

The EPA requires that the proposed boiler meet limits on the emission of dioxins and furans. In order to demonstrate acceptable performance, the EPA recommends that testing is undertaken as part of the commissioning of the solid-fuel boiler (**Attachment 1**). Test results should verify that emissions are acceptable under normal operating conditions using the fuel mix proposed to be used. If the modification is approved, the current Environment Protection Licence (EPL) will be modified to refer to a new emission point following decommissioning (**Attachment 2**).

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Waste

The EPA is concerned that the additional information has not identified a definite option for disposal or re-use of the ash generated by the proposed boiler. The EPA therefore recommends that prior to the operation of the boiler commencing, that confirmation of the facility that will accept the ash as either waste or a recycling product is provided to the EPA. Additionally, the EPA recommends a consent condition that states that ash is only approved for temporary storage on site in a dedicated concrete bunker.

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

18/3/15

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

Attachment 1:
Recommended General Terms of Approval – Dongwha Sawmill Bombala

EF13/3853-07

Commissioning of solid-fuel boiler

The Air Quality Assessment is based on manufacturer's performance specifications of emissions. These are:

Dust as PM_{10}	5.9	mg/m^3
CO	27.1	mg/m^3
SO_x	0	mg/m^3
NO_x	164	mg/m^3

The EPA also requires the proposed boiler meet limits on the emission of dioxins and furans.

Verification of this performance is required as part of commissioning. That is, test results are required to verify that emissions are no more than set out above under normal operating conditions using the fuel mix proposed to be used (acceptable performance). Testing is to be carried out according to the test methods listed below.

Pollutant	Units of measure	Sampling Method
Nitrogen oxides	milligrams per cubic metre	TM-11
Carbon monoxide	milligrams per cubic metre	TM-32
Solid particles	milligrams per cubic metre	TM-15
'Fine' particulate (PM_{10})	milligrams per cubic metre	OM-5
Dioxins and furans	nanograms per cubic metre	TM-18

Commissioning is complete once acceptable performance has been demonstrated.

Attachment 2:

Revised recommended licence conditions – Dongwha modified plant upgrade

EF13/3853-06

Current licence: EPL 11205

Current conditions (planning approval PA-07-0161)
Refer to EPA point 23 – exhaust stack from gas-fired boiler DP1, and point 24 – exhaust stack from gas-fired boiler DP2.

POINT 23,24

Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Nitrogen oxides	mg/m^3	125	Dry, 273K, 101.3 kPa, 3% O2		As per test method
Volatile organic compounds	$\mu g/m^3$	5	Dry, 273K, 101.3 kPa, 3% O2		As per test method

POINT 23,24

Pollutant	**Units of measure**	**Frequency**	**Sampling Method**
Carbon dioxide	percent	Yearly	TM-24
Dry gas density	kilograms per cubic metre	Yearly	TM-23
Moisture	percent	Yearly	TM-22
Molecular weight of stack gases	grams per gram mole	Yearly	TM-23
Nitrogen Oxides	milligrams per cubic metre	Yearly	TM-11
Oxygen (O2)	percent	Yearly	TM-25
Temperature	degrees Celsius	Yearly	TM-2
Velocity	metres per second	Yearly	TM-2
Volatile organic Compounds	milligrams per cubic metre	Yearly	OM-2
Volumetric flowrate	cubic metres per second	Yearly	TM-2

Modified plant upgrade

Replaces DP1, DP2 with a new emission point DP5. Proposed emission points DP3 and DP4 are not added to the licence.

If DP&E approve the modification to the plant upgrade, modify licence to refer to a new emission point DP5 and delete emission points 23 and 24 **following decommissioning**. Emission point to be included at P1.1 (next number is 35). Add emission point DP5 to figure D10, locating it as shown in figure 2.1 of the EIS dated 22nd August 2014.

35	Discharge to Air	Discharge to Air	Exhaust stack from wood-fired boiler marked "DP5" on figure D10 of the Environmental Assessment dated 22nd August 2014

At L2.3, add

Point 35:

Pollutant	Units of Measure	100th percentile concentration limit	Reference conditions	Oxygen correction	Averaging period
Nitrogen oxides	mg/m^3	200		--	As per test method
Carbon monoxide	mg/m^3	50		--	As per test method
Solid particles	mg/m^3	30		--	As per test method
'Fine' particulate (PM_{10})	mg/m^3	10		--	As per test method
Dioxins and furans	ng/m^3	0.1		--	As per test method

At M2.2, add

Point 35:

Pollutant	Units of measure	Frequency	Sampling Method
Nitrogen oxides	milligrams per cubic metre	Yearly	TM-11
Carbon monoxide	milligrams per cubic metre	Yearly	TM-32
Solid particles	milligrams per cubic metre	Yearly	TM-15
'Fine' particulate (PM_{10})	milligrams per cubic metre	Yearly	OM-5
Dioxins and furans	nanograms per cubic metre	Yearly	TM-18
Temperature	degrees Celsius	Yearly	TM-2
Velocity	metres per second	Yearly	TM-2
Volumetric flow rate	cubic metres per second	Yearly	TM-2