DOC19/588259-24

The Director
Industry Assessments
Department of Planning, Industry and Environment

Attention: Bruce Zhang

Dear Mr Ritchie

Re SSD 6619 MOD 1

I refer to the notification the Environment Protection Authority on 27 November 2019 from the Major Protects Portal about the modification application to State Significant Development 6619 proposing the inclusion of a battery formation plant at the existing Enirgi Power Storage Recycling Pty Ltd's (Enirgi) used lead acid battery recycling facility located at Bomen.

We have reviewed the Environmental Assessment (EA) and specialist consultant reports supporting the application. Our review has identified that further information is required to allow us to fully assess the environmental impacts of the proposal. The details of the information we require is provided at Attachment A.

Please note we have contacted Matthew Morton from Enirgi and discussed our information requests with him. We are also available to meet to discuss these issues should the proponent or the Department of Planning, Industry and Environment require any further information about this request.

If you have any further enquiries about this matter please contact Briohny Seaman by telephoning 02 6969 0700 or by electronic mail at riverina.farwest@epa.nsw.gov.au.

Yours sincerely

C. Bretherton 16.12.2019

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Attachment A

The Environment Protection Authority (EPA) has reviewed the Environmental Assessment (EA) and specialist consultant reports supporting the State Significant Development (SSD) modification application for the inclusion of a battery formation plant at the existing Enirgi Power Storage Recycling Pty Ltd's used lead acid battery recycling facility located at Bomen.

Based on the information provided, we cannot adequately assess the potential impacts of the proposal. In order to fully assess these impacts, we require the following information.

Air Quality Impact Assessment

1. *Scrubber design and efficiency not adequately described and benchmarked*

Information provided in the Air Quality Impact Assessment (AQIA) on emission controls is not adequate to evaluate the potential air emissions from the proposed modification. The AQIA states that for the emissions from the proposed battery formation plant (BFP) a scrubber will be the primary control technology.

The AQIA provides the assumption that the new scrubber will meet the emission levels provided and provides proposed emission concentrations in Table 4.2. Considering the AQIA refers to the Protection of the Environment (Clean Air) Regulation 2010 Group 6 as well as the Environment Protection Licence (EPL) pollutant limits (which currently do not exist for this emission source), it is unclear what level of emissions the scrubber is designed for and where the proposed emission concentrations are derived from.

We recommend the proponent provide specifications of the scrubber that will be used to control emissions including, but not limited to, the design specifications, process of removal/reduction of pollutants and performance efficiency.

We also recommend that final scrubber design be benchmarked against international best technology and performance efficiency.

2. *Exceedance of annual $PM_{2.5}$ impact assessment criteria*

The AQIA states there are no predicted exceedances of the impact assessment criteria (IAC). However, the dispersion modelling predicts exceedances of the cumulative annual $PM_{2.5}$ IAC of 8 micrograms per cubic metre ($\mu g/m^3$) at two receptors (R7 and R8) up to 9.1 $\mu g/m^3$ from a background of 7.9 $\mu g/m^3$. Additionally, no further mitigation, management or control measures are proposed to address the exceedances.

We recommend that the proponent consider additional measures to reduce impacts of particulates at offsite receptors.

3. *Inadequate dispersion modelling*

a) The assessment of the air quality impacts has used the maximum allowable emission rates (the limits from EPL 12878 for activities at the premises) for the existing and approved point sources in the dispersion modelling rather than using actual measurements. The AQIA states that results from air quality monitoring show compliance with the EPL limits without providing the data to demonstrate this.

   Using EPL limits as maximum emissions concentrations is acceptable provided the proponent includes data to demonstrate that the existing point sources are meeting the current limits and justify that the assessment scenario accounts for the worst-case emission variability.

   The EA needs to address this.

b) The emissions inventory only provides emission rates grams per second (g/s) for the current and proposed point sources and does not consider additional emissions.

We recommend that emissions from all potential sources be assessed and included in the emissions inventory, including fugitive emission from the BFP. We also recommend the emissions be provided as kilograms per year (kg/yr) as well as g/s.

c) The AQIA provides tables of incremental impacts from the modification (Table 5.1) and cumulative impacts at nearby receptors (Table 5.2) but does not provide incremental impacts from the entire facility.

We recommend that the proponent evaluate incremental and cumulative impacts for all pollutants from all emission sources at the facility and in addition to the tables, present the dispersion modelling results in contour plots.

4. *Onsite meteorology data not provided*

The AQIA states an onsite weather station was used in the assessment but only provides meteorological data generated by CALMET and comparison of annual CALMET data to Bureau of Meteorology data for Wagga Wagga North.

We recommend the proponent provide as additional information, the meteorological data from the onsite weather station, including where possible, as a minimum: annual and seasonal wind speed, wind direction, temperature and stability class.