



Our ref: DOC21/738619-9

Department of Planning, Industry and Environment
By: Major Projects Portal and
Via email: Thomas.bertwhistle@planning.nsw.gov.au

Attn: Mr Thomas Bertwhistle

24 September 2021

Dear Sir

MP08_0129 Mod 5 – Orica Kooragang – Prill Tower Scrubber (pollution controls)

The Environment Protection Authority (EPA) has reviewed the submission to the Department of Planning, Industry and Environment (DPIE) by Orica Australia Pty Ltd (Orica) to modify development consent MP08_0129 to upgrade pollution controls for the Prill Tower (the Project) at 15 Greenleaf Road, Kooragang (the Premises). This proposal is known as Modification 5.

Background

Orica holds Environment Protection Licence 828 (the Licence) which is issued under *Protection of the Environment Operations Act 1997* and authorises scheduled activities, including chemical production, to be carried on at the Premises.

Orica is required to install pollution controls in the form of an irrigated fibrebed scrubber at the ammonium nitrate Prill Tower, under condition U3 (Pollution Reduction Program 50) of the Licence. Condition U3 details milestones which Orica must meet in carrying out this significant project, with final completion of the project due by 31 January 2024.

EPA position on the Modification 5 proposal

The EPA has reviewed the Statement of Environmental Effects (SEE) for the Project, dated August 2021, and has considered additional information sought and received from Orica about the proposal.

The EPA notes the Project should result in significant improvements in air quality and has no objection to the proposal and recommends that DPIE include the following conditions in the consent, should the modification be granted:

1. The height of the Prill Tower scrubber stack must be 37.9 m from ground level, at a minimum, unless otherwise approved in writing by the EPA.
2. The proponent must undertake a post commissioning air quality verification assessment to be submitted to the EPA.

The following conditions (with the exception of 'A') should not form part of any approved consent documentation but are conditions the EPA proposes to add to the Licence at an appropriate time, should the modification be granted:

- A. The height of the Prill Tower scrubber stack must be 37.9 m from ground level, at a minimum, unless otherwise approved in writing by the EPA.
- B. Amend Condition P1.2 –
 - a. Delete Discharge Point 16 being the current air discharge point for the Prill Tower
 - b. Add Discharge Point 40 being the outlet of the Prill Tower scrubber stack.
 (Note this means direct discharge from the Prill Tower will not be permitted post commissioning of the Project.)
- C. Amend Condition L3.4 for Discharge Point 40 as below:

Pollutant	Unit of measure	100%percentile concentration limit	Reference Condition	Oxygen Correction	Averaging Period
Total Solid Particles	mg/Nm ³	5	273K, 101.3 kPa, Dry	N/A	1 hour
Ammonia	mg/Nm ³	0.05	273K, 101.3 kPa, Dry	N/A	1 hour

- A. Amend Condition M2.2 for Discharge Point 40 as below:

Pollutant	Unit of measure	Frequency	Sampling Method
Total Solid Particles	mg/Nm ³	Post Commissioning ¹ and yearly thereafter	TM-15
PM ₁₀	mg/Nm ³	Post Commissioning ¹ and yearly thereafter	AM-18
PM _{2.5}	mg/Nm ³	Post Commissioning ¹ and yearly thereafter	AM-18
Ammonia	mg/Nm ³	Post Commissioning ¹ , and yearly thereafter	ISO Method 21877

Note: ¹ Post commissioning means a minimum of 3 rounds of monitoring within 6 months of commissioning, conducted at least one month apart.

- B. The proponent must undertake a post commissioning air quality verification assessment, as detailed below:

Post Commissioning Air Quality Verification Assessment – MOD 5 – Prill Tower Scrubber

Within 8 months of commissioning of the Prill Tower scrubber as detailed in Pollution Reduction Program 50 of this licence and detailed in Modification 5 to the development consent, the Licensee must submit a Post Commissioning Air Quality Verification Assessment (the assessment) to the EPA. The assessment must include:

- (a) Post commissioning monitoring for Total Solid Particles (TSP), PM₁₀, PM_{2.5} and ammonia in accordance with condition M2.2 of the EPL.

- (b) Analytical results and monitoring reports for post commissioning monitoring.
- (c) A submission on reasonable and feasible licence limits for PM₁₀ and PM_{2.5} to be applied for Point 40.
- (d) Where emissions of TSP and ammonia from post commissioning monitoring are higher than emission limits specified in Condition L3.4, options to achieve compliance with the discharge emission limits.

Note: Upon receipt and review of the assessment, the EPA may remove, upon request, the requirement to monitor ammonia.

Note: The EPA is proposing to add licence limits for PM₁₀ and PM_{2.5} for Point 40 following submission of the assessment.

Should you have any questions, please contact Melissa Moore on ph 02 4908 6892.

Yours sincerely

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Environment Protection Authority