



Electorate Liaison Request

Please ensure your Member of Parliament reworks the information provided into a personal response.

Member: Member for Albert	Request Date:
Issue: Phoenix Power Recyclers Conditions of Approval imposed by EHP	CTS No:

From: Environment and Heritage Protection	Response Date:
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Issue/Question:

1. The Yatala Resident's Alliance is seeking clarification on certain aspects of EHP's concurrence response dated 3 April 2014 to Phoenix Power Recyclers proposed for the proposed environmentally relevant activities to be undertaken at 126 Sandy Creek Road Yatala.

Response:

2. EHP confirms that the two noise limits are not a typo. EHP regulates noise from all the environmentally relevant activities carried out at the premises while council has jurisdiction over the the general use of the premises under the Gold Coast City's Planning Scheme. Hence, the variance in daytime noise limits in the response.
3. In Table 2(a) entitled: "Contaminant Release to air", the air pollutant emission limits were based on the following sources:
 - a. Total Suspended Particulates limit of **50** mg/Nm³ (dry) at 7% O₂ is based on the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - b. Sulphur dioxide (SO₂) limit of **300** mg/Nm³ (dry) at 7% O₂ is based on the ANE Consultant air quality assessment report. NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* does not have any SO₂ emission limit.
 - c. Carbon Monoxide limit of **125** mg/Nm³ (dry) at 7% O₂ is based on the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - d. Oxides of Nitrogen (measured as NO₂) limit of **300** mg/Nm³ (dry) at 7% O₂ is based on the ANE Consultant air quality assessment report. This limit is more stringent as compared to the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW), specified as 500 mg/Nm³ (dry) at 7% O₂.
 - e. Total reduced sulphur concentration limit is generally not specified for power generators. Total reduce sulfur (TRS) is included in the list because it includes sulfur-containing odorous compounds such as hydrogen sulfide, dimethyl sulfide, dimethyl disulfide and methyl mercaptan and it can be used as a surrogate for odour. Vic EPA 3-min average design standards for TRS is 0.026 mg/m³ (1-hour average design standard is 0.01 mg/m³). Using a conservative 1-hour dilution factor of 2000 at the sensitive receptor, the limit was calculated as **20** mg/Nm³.
 - f. Hydrogen Sulphide release limit of **5** mg/Nm³ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - g. Volatile Organic Compounds (VOC) limit of **40** mg/Nm³ (dry) at 7% O₂ is based on the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - h. EPP (Air) and NEPM ambient air quality objective for PAH as B(α)P is 0.3 ng/m³ (annual average). Using an annual average dilution factor of 600,000 at the sensitive receptor, the limit can be calculated as **0.20** mg/Nm³. PAH emission limit is not specified in NSW *Protection of the Environment Operations (Clean Air) Regulation 2010*.
 - i. Dioxin and furan emission limit of **0.1** ng I-TEQ/Nm³ @ 11 % O₂ is based on best practice emission limits recommended by German and European Union Agencies. NSW EPA also recommended the same stack emission limits for the municipal solid waste burning facilities. The medical waste incinerators operating in Queensland also have the same dioxin/furan stack emission limit. Dioxin test

takes a few hours to complete and it is not possible to monitor continuously. If the sixth monthly monitoring identifies an exceedance, then the EHP will request further testing to be undertaken.

- j. Hydrogen chloride (HCl) limit of **100** mg/Nm³ (dry) at 7% O₂ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW). This limit may be not as stringent as European emission standards for medical waste incinerators.
 - k. Hydrogen fluoride (HF) limit of **50** mg/Nm³ (dry) at 7% O₂ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW). This limit may be not as stringent as European emission standards for medical waste incinerators.
 - l. Formaldehyde is a small component of VOC. Since the VOC limit is 40 mg/Nm³, the formaldehyde emission limit was set as 5 mg/Nm³ (dry) at 7% O₂. EPP (Air) ambient air quality objective for Formaldehyde is 54 µg/m³ (24-hour average). Using a 24-hour average conservative dilution factor of 5,000 at the sensitive receptor, the proposed limit can easily meet EPP (Air) objectives at the sensitive receptors.
 - m. Cadmium emission limit of **0.2** mg/Nm³ (dry) at 7% O₂ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - n. Mercury emission limit of **0.2** mg/Nm³ (dry) at 7% O₂ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
 - o. Total Heavy Metals emission limit of **1** mg/Nm³ (dry) at 7% O₂ is in consistent with the NSW *Protection of the Environment Operations (Clean Air) Regulation 2010* (State Government of NSW).
4. EHP acknowledges that industry is best placed to identify the most appropriate way to manage their activities to ensure environmental performance outcomes are achieved and standards are maintained. To achieve this, EHP has implemented a new regulatory strategy which articulates the environmental outcomes and standards that industry must adhere to. Where the risk is greater, standards will be higher and if necessary, compliance and enforcement actions stronger. It is against EHP policy to stipulate which technology to use as long the industry can achieve the desired environmental outcomes as set in their approval. Under the Environmental Protection Regulation 2008, the approved biomass plant has a rated capacity of 10 MW to 150MW electrical. When the biomass plant is commissioned, the residents may request to obtain a copy.
 5. EHP is responsible for managing the health of Queensland's environment, enabling sustainable development and has imposed site specific conditions including monitoring to ensure that the composting process and green waste crushing and screening activities are undertaken in a manner that all harmful pathogens including spores are destroyed. Additional testing may be undertaken if required. EHP has adopted a targeted proactive approach to identify environmental risks, increasing compliance and taking strong enforcement action where necessary.