



Government of Western Australia
Department of Environment Regulation

A 679968
Your ref: L6217/1983/14
Our ref: 2012/007237-02
Enquiries: Chris Malley
Phone: 9333 7484
Fax: 9333 7550

Messrs Vince Puccio & Merv McDonald
Co-chairs
Community Alliance for Positive Solutions Inc.
PO Box 69
YARLOOP WA 6218

Dear Sirs,

APPLICATION FOR LICENCE RENEWAL L6217/1983/14, ALCOA WAGERUP, 21 DAY COMMENT PERIOD

I wish to advise the Department of Environment Regulation (DER) has received an application from Alcoa to renew its Wagerup Alumina Refinery licence (L6217/1983/14) that expires on 12 November 2013. DER will advertise this application in the *West Australian* newspaper on Monday, 7 October 2013 inviting public submissions for a period of 21 days. An electronic copy of the advertisement will also be available on DER's website at www.der.wa.gov.au/about-us/monday-ads as of that date.

DER invites the Community Alliance for Positive Solutions (CAPS) to make a submission and inform it membership of this invitation. CAPS members are able to tender their own individual submissions should they wish to do so. Submissions can be made in writing as follows:

1. Email to: chris.malley@der.wa.gov.au; or
2. Post to: Team Leader - Industry Regulation, Swan Region
Department of Environment Regulation
PO Box 33 Cloisters Square
PERTH WA 6850

The table attached to this letter was prepared by Alcoa and presented at the most recent Community Consultative Network (CCN) meeting on 20 September 2013. It summarises preliminary changes to the licence that are being considered and that you may wish to provide specific comment on.

Should you or any member of CAPS have queries or wish to discuss the process in more detail, please contact Chris Malley of the Swan Region on 9333 7484.

Yours sincerely

Marko Pasalich
Team Leader, Industry Regulation
Swan Region

Wednesday, 2 September 2013

Swan Region – Industry Regulation
181-205 Davy Street, Booragoon WA 6154
Ph: (08) 9333 7510 Fax: (08) 9333 7550
Postal Address: Locked Bag 33, Cloisters Square, Perth WA 6850
www.der.wa.gov.au

COPY

Alcoa Wagerup Licence L6217/1983/14

Licence renewal – November 2013

Draft conditions currently proposed between DER and Alcoa Wagerup – open for consultation

KEY: ~~Strikethrough~~ – wording deleted highlighting – wording amended

<p>G4(b) The licensee shall, every month, provide the director with (as a hard copy and in an electronic format) and cause to be published in the newspaper local to the Yarloop community, a monthly summary of the complaints data received by the licensee in the preceding month in accordance with condition G4(a). The summary should include the number, date and type of complaint (both daily and total) and number of complainants, but exclude the name and address of the complainants). The Director shall also be provided evidence that the data has been published.</p>	<p>G4(b) The licensee shall, every month, provide the director with (as a hard copy and in an electronic format) and cause to be published in the newspaper local to the Yarloop community, a monthly summary of the complaints data received by the licensee in the preceding month in accordance with condition G4(a). The summary should include the number, date and type of complaint (both daily and total) and number of complainants, but exclude the name and address of the complainants). The Director shall also be provided evidence that the data has been published.</p>	<p>It is now acceptable to send reports by email but the onus is on the sender to ensure that the email has been received.</p>
<p>LICENSED PRODUCTION A1 (a) The licensee shall ensure that the refinery is operated in the following manner: (i) Production of alumina shall not exceed 2.625 million tonnes per annum between 13 August 2011 and 12 August 2013; (ii) Production of alumina shall not exceed 2.65 million tonnes per annum between 13 August 2012 and 12 August 2013; (iii) Production of alumina shall not exceed 0.67</p>	<p>A1 (a) The licensee shall ensure that the refinery is operated in the following manner: (i) Production of alumina shall not exceed 2.65 million tonnes per annum (ii) Daily production of alumina shall not exceed 8400 tonnes. All production figures shall be measured by weightometer as alumina leaves the calciner.</p>	<p>Other conditions have been met.</p>

<p>million tonnes between 13 August 2013 and 12 November 2013; and</p> <p>(iv) Daily production of alumina shall not exceed 8400 tonnes.</p> <p>All production figures shall be measured by weightometer as alumina leaves the calciner</p>		
<p>A1(b) The licensee shall provide a report to the Director showing compliance with condition A1(a) by 21 August in each calendar year for the period 13 August the previous year to 12 August in that year.</p>	<p>A1(b) The licensee shall provide a report to the Director showing compliance with condition A1(a) by 21 November in each calendar year for the period 13 November the previous year to 12 November in that year.</p>	<p>Amended to reflect licence year of November to November. Change also due to amendment to A1(a).</p>

A2 (a) The licensee shall ensure that the Calciners are operated so that for the period shown in Column 1 of Table 1 Aggregate Calciner Priority VOC emissions shall not exceed the amount shown in Column 2 of Table 1.

Table 1: Calciner Operation

Column 1	Column 2
Period of licence	Aggregate Calciner Priority VOC emissions in kg
Licence year	31219
1 st 90 days up to and including 10 th November in each calendar year	7698
1 st 180 days up to and including 8 th February in each calendar year	15396
1 st 270 days up to and including 9 th May in each calendar year	23094

ENVIRONMENTAL IMPROVEMENTS – VOC REDUCTION

A3 The licensee shall submit a works approval application to the Director by 31 January 2013 for a VOC emissions reduction project.

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Amending reporting dates to reflect licence year of November to November.

Condition has been met.

Remove condition

<p>ENVIRONMENTAL IMPROVEMENTS – VOC REDUCTION</p> <p>A4 The Works approval application shall include a detailed proposal, design specifications, construction timeframes and a commissioning plan to reduce VOC emissions from the premises by 31 March 2014, so as to achieve a reduction in VOC emissions that equates to at least 1.5 times the amount of VOC emissions attributed to a production increase to 2.8 million tonnes of alumina per year.</p>	<p>Remove condition</p>	<p>The Minister of Environment; Heritage released decision on amendment in August 2013. A partial wording change is upheld. As the condition has been met, it is justified to remove the condition from the licence.</p>
<p>CONDENSER – CONDENSABLE/NON-CONDENSABLE EMISSIONS</p> <p>A8 The licensee shall ensure that gases and vapour emitted from the digesters and flash tanks under maintenance at the refinery are passed through a condenser (unless the condenser is under maintenance) and;</p> <p>(i) Condensate extracted by the condenser is directed to the lower dam at the refinery for oxidation and/or the condensate is directed to the Lakewater circuit at the refinery and/or used as process waters at the refinery; and</p> <p>(ii) Gases and vapour not extracted by the condenser are directed to the air feed of the boilers within the powerhouse at the refinery for incineration, unless maintenance is being undertaken on the air feed line to the boilers.</p>	<p>CONDENSER – CONDENSABLE/NON-CONDENSABLE EMISSIONS</p> <p>A8 The licensee shall ensure that gases and vapour emitted from the digesters and flash tanks under maintenance at the refinery are passed through a condenser (unless the condenser is under maintenance) and;</p> <p>(i) Condensate extracted by the condenser is directed to the lower dam at the refinery for oxidation and/or the condensate is directed to the Lakewater circuit at the refinery and/or used as process waters at the refinery; and</p> <p>(ii) Gases and vapour not extracted by the condenser are directed to the air feed of the boilers within the powerhouse at the refinery for incineration, unless maintenance is being undertaken on the air feed line to the boilers.</p>	<p>Administrative change due to doubling up of wording</p>

	<p>AIR QUALITY TARGETS – LIQUOR BURNER STACK</p> <p>A9 The Licensee shall, upon becoming aware that an emission listed in Column 2 of Table 2 has exceeded the emission target for that emission, in Column 3 of Table 2, undertake the target exceedance response required by conditions A10, A11, A12 and A13.</p> <p>Table 2: LBF Emission Targets.</p> <table border="1"> <thead> <tr> <th>Column 1</th> <th>Column 2</th> <th>Column 3</th> </tr> <tr> <th>Emission Source</th> <th>Parameter</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>Liquor Burner stack</td> <td>Particulates</td> <td>30 mg/m3</td> </tr> <tr> <td>LBF RTO Outlet Ducting</td> <td>CO</td> <td>100 ppm</td> </tr> <tr> <td>LBF RTO Combustion Zone</td> <td>Temperature</td> <td>≥750°C</td> </tr> </tbody> </table>	Column 1	Column 2	Column 3	Emission Source	Parameter	Target	Liquor Burner stack	Particulates	30 mg/m3	LBF RTO Outlet Ducting	CO	100 ppm	LBF RTO Combustion Zone	Temperature	≥750°C	<p>Terminology clarification.</p> <p>Temperature is an operating condition and not an emission; therefore it's reasonable that it be referred to as an operating parameter in the table. Similarly it's not accurate to refer to "emission point" when referring to temperature and "source" is more representative.</p> <p>Proposed wording provided by DER.</p>															
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<p>SECTION 7: SOLID WASTE CONTROL CONDITIONS</p> <p>WASTE ACCEPTANCE</p> <p>S1(a) The licensee may dispose of the following types of waste(s) to the RDA's (depicted in Appendix B), that have been generated at the premises, the licensee's Willowdale Minesite and Bunbury Rail Terminal and Port Loading</p>	<p>SECTION 7: SOLID WASTE CONTROL CONDITIONS</p> <p>WASTE ACCEPTANCE</p> <p>S1(a) The licensee may dispose of the following types of waste(s) to the RDA's (depicted in Appendix B), that have been generated at the premises, the licensee's Willowdale Minesite and Bunbury Rail Terminal and Port Loading</p>	<p>Wagerup does not have a CTO and therefore do not need to dispose of this kind of waste.</p>																														

<p>Facility or the Alinta Wagerup Cogeneration Power Plant:</p> <p>(i) Waste meeting acceptance criteria specified for Class II landfills in the document produced by the Department of Environmental Protection, titled "Landfill Waste Classifications and Waste Definitions 1996 (as amended)", or hydrocarbon contaminated wastes;</p> <p>(ii) Wastes generated from alumina production and associated activities excluding;</p> <p>(a) elemental mercury collected as a waste stream;</p> <p>(b) spent liquor burner CTO catalyst;</p> <p>(c) asbestos materials;</p> <p>(d) packaged laboratory chemical waste; and</p> <p>(e) clinical waste.</p>	<p>Facility or the Alinta Wagerup Cogeneration Power Plant:</p> <p>(i) Waste meeting acceptance criteria specified for Class II landfills in the document produced by the Department of Environmental Protection, titled "Landfill Waste Classifications and Waste Definitions 1996 (as amended)", or hydrocarbon contaminated wastes;</p> <p>(ii) Wastes generated from alumina production and associated activities excluding;</p> <p>(a) elemental mercury collected as a waste stream;</p> <p>(b) spent liquor burner CTO catalyst;</p> <p>(c) asbestos materials;</p> <p>(d) packaged laboratory chemical waste; and</p> <p>(e) clinical waste.</p>
<p>APPENDIX A</p> <p>TABLE 7: MONITORING PROGRAM – RDA DUST</p> <p>Frequency – 4 samples taken between October 2008 and March 2009 if:</p> <ul style="list-style-type: none"> Dust concentration is greater than 100 ug/m³ (background corrected). 	<p>APPENDIX A</p> <p>TABLE 7: MONITORING PROGRAM – RDA DUST</p> <p>Frequency – 4 samples taken between October 2008 and March 2009 if:</p> <ul style="list-style-type: none"> Dust concentration is greater than 100 ug/m³ (background corrected). <p>Administrative change – year should have been removed in previous licence renewals.</p>

<p>APPENDIX A TABLES 9 AND 10 Monitoring Program – Calciners (Table 9) and Liquor Burner Facility (Table 10). Method USEPA MMT05</p>	<p>APPENDIX A TABLES 9 AND 10 Monitoring Program – Calciners (Table 9) and Liquor Burner Facility (Table 10). Method USEPA MMT05 or equivalent</p>	<p>MMT05 is a non-isokinetic ambient test method while Method 0011 is an isokinetic stack testing method. MMT05 is not strictly a stack testing method but the principle of the method is applicable for non-isokinetic stack sampling of aldehydes and ketones. The addition of “or equivalent” allows for the appropriate deviations (which is approved and NATA certified) for the testing parameters.</p>
<p>Premises Map – Appendix B</p>	<p>Premises map to be included with boundary line</p>	<p>Clerical error in May 2012 amendment included a map with no premises boundary line.</p>
<p>Oxalate Kiln Works Approval conditions</p>	<p>Proposed amendment to be drafted by DER</p>	<p>Works approval W4587/2009/1 expires on 12 November 2013, and conditions are to be included in licence.</p>