



Your (DER) Ref: D-AA-14/8031

Kelly Faulkner
Appeals Convenor
Level 22, Forrest Centre
221 St. Georges Terrace
PERTH WA 6000

26th November 2014

Appeal

Ref: Renewal of Licence No 8174/2007/4 Alcoa, Wagerup Cogeneration Plant.

Dear Kelly

Following a request from the Department for Environmental Regulation (DER) for us to assist them by lodging an appeal to their Renewal of Licence No. 8174/2007/4 Alcoa's, Wagerup Co-generation Plant, be advised that we object to the renewal of this licence until all issues, comments and questions below are addressed and proof provided by all relevant departments.

1. This Co-generation Plant is operating close to a populated area without any buffer. Yet a Piggery within the industrial buffer zone at Kemerton has been refused planning permission, as it required a 5km separation from residential areas. How can an odour issue be given more relevance as a threat to a population than a Co-generation plant that produces volatile organic compounds and particulate matter (endangering the health of residents) as well as noise? Odour is an aesthetic issue, though a valid one, but it is not a health issue. Can DER, Department of Planning (DoP) or others offer some justification for this anomaly? The licence of the Wagerup Co-generation Plant should not be renewed until a buffer is in place.
2. Has the DER been advised by the Department of Health (DoH) or others regarding studies of Diesel Carcinogenic, PM 2.5, Gas VOC, and other emissions? If so, will these pollutants be taken into account in the licence renewal process and can DER or DoH provide copies of these?
3. Can DER advise on the acceptable level of carcinogenic emissions, such as PM 2.5, when the Co-generator was operating 100% of the time on diesel fuel during the Varanus Island Gas Pipeline shut down? Was any monitoring done at this time and does the current licence allow for this amount of diesel fuel, i.e. what is the maximum number of hours allowed for diesel usage in the current licence and is a special dispensation application required? Please provide copies of monitoring reports and any such request.
4. Has any study been made by Department of Water (DoW) or others into Co-Gen water usage and /or the levels of salt water waste discharged from the Co-generating

Yarloop
Waroona
Hamel
Harvey
Cookernup
Wagerup
Other Impacted Areas

plant into the Residue Drying Area (RDA) at Wagerup? If so, are the water usage and contamination monitored on-going and taken into account for the licence renewal? If so can DER, DoW or others provide copies of this information?

- 5: **Ref. Attachment 2. Page 3 of 7:** Why has this not been referred to the EPA under Part IV of the Act? Is not the 35,000,000 Ltrs of Salt Water from the Co-generation Plant, a discharge of Waste into a designated area? Or is the RSA not such an area? Why have the Department of Water (DoW) not been consulted about this? Especially in view of the mixing of this discharge with other elements contained within the RSA.

We thank you for your attention and in anticipation of an early and favourable reply.

Yours Sincerely

Vince Puccio
Co-Chairs: Community Alliance for Positive Solutions Inc.

Merv McDonald, AFSM

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Attached: Appellants Appeal Petition.

Cc; The Honourable Colin Barnett MLA, Premier, Prof. Bryant Stokes, Hon Albert P. Jacob MLA,
Hon Terry Redman MLA, Gail McGowan - Director General W.A. Department of Planning,
Maree DeLacey - Director General W.A. Department of Water.