



## **EPA LICENCE**

# Adelaide Brighton Cement's licence renewal

**Issued 13 September 2017**

Cement manufacturing activity at Birkenhead in South Australia was first established in 1913, originally using limestone from the Yorke Peninsula that was transported across the gulf by steamship, and black clay from the Port River. Its location was ideal due to its proximity to the Port River and affordable housing for its workers. Today materials are received, stored, blended and put through a kiln to manufacture cement products for local and interstate markets.



*Photo courtesy of Adelaide Brighton Cement*



# Adelaide Brighton Cement's current licence

The Adelaide Brighton Cement (ABC) facility at Birkenhead is licensed by the EPA to undertake the following activities:

- cement works
- activities producing listed waste
- bulk shipping facilities
- crushing, grinding or milling of rock, ores or minerals
- fuel burning.

These activities have the potential to cause offsite impacts, including noise and dust. This is particularly the case when there are residential properties close to industrial facilities.



The EPA's role is to ensure that operators take all reasonable and practical measures to minimise impacts on the environment and the local community. One way the EPA does this is by setting licence conditions. These conditions are developed through negotiation between the EPA and the licence-holder. The EPA also works with companies to assist them to comply, conducts regular inspections of facilities and reviews emissions data.

An EPA licence is issued for a set term and at the end of this term the holder of the licence must apply for a renewal. The licence renewal process provides an opportunity to review, and where necessary update licence conditions. The ABC licence at Birkenhead is due for renewal and ABC will commence operating under the new licence on 1 November.

## Licence renewal – what's involved?

The EPA is in the process of determining what conditions are appropriate for ABC's renewed licence. This has involved reviewing feedback that has been provided so far from the community, ABC's environmental performance and the availability of new technologies, as well as discussing the proposed conditions with ABC.

Prior to changing any licence conditions, the EPA must issue a notice to ABC that outlines what those changes are, along with the reasons for the change. ABC is then provided with the opportunity to respond and the EPA will take that response into consideration before finalising what conditions should be applied. Any condition placed on the licence must be linked to the legislative powers of the EPA under the *Environment Protection Act 1993* (EP Act).

The EPA recognises that there is a high level of community interest in ABC's operations and is therefore seeking feedback from local residents about the proposed conditions.

The EPA's approach is for licence conditions to be clear, risk-based and outcomes focused.





# Draft proposed licence renewal conditions for consultation and further discussion with ABC

The existing EPA licence under the *Environment Protection Act 1993* (the Act) for Birkenhead includes conditions relating to a range of environmental aspects of the operation.

The proposed new licence will ensure that those aspects continue to be adequately addressed, with a renewed focus on controls around particle emissions, continuance of requirements to address noise, improved public access to monitoring data, and mandating of community consultation processes.

Some of the key conditions are explained in the table below.

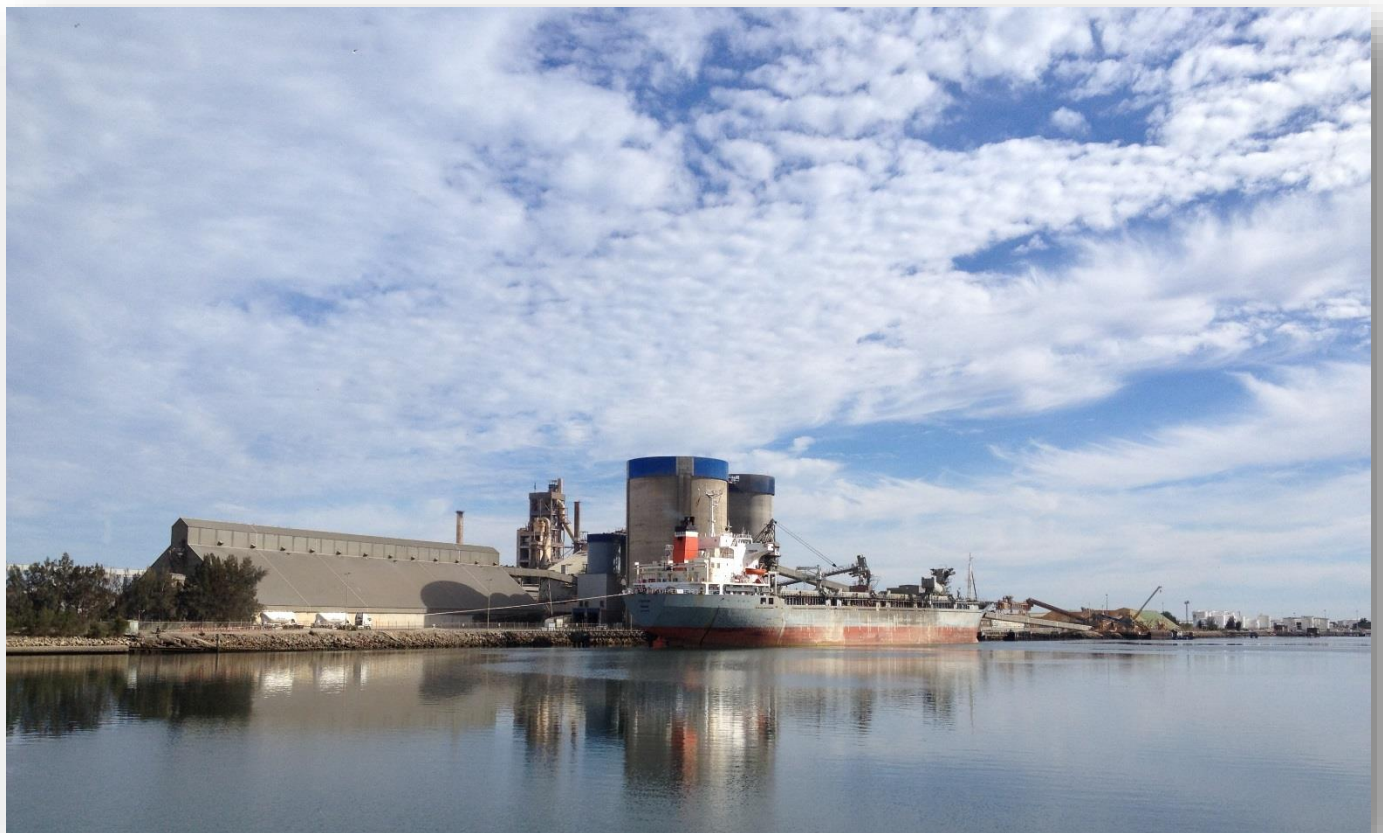
Aspect	Change proposed	Reference	Explanation
<b>Dust management , materials management, housekeeping, truck cleaning, monitoring and reporting</b>	New and improved	U-755 U-729 U-765	<p>The EPA has recently received and accepted an independent <i>Air Emissions Testing and Modelling</i> report on the Birkenhead site. One of the key findings from this report is that ground level dust sources rather than stack emissions contribute the majority of ground level particulate emissions generated by ABC's operations.</p> <p>A new requirement for a <i>Dust Management Plan</i> and a <i>Ground Level Particulate Monitoring and Reporting Plan</i> is proposed. Once developed and approved by the EPA, the intention of these plans is to establish trigger values and the onsite actions that will need to be implemented by ABC to prevent and minimise dust emissions offsite.</p> <p>To monitor the effectiveness of dust management it is proposed that ABC continue its current onsite monitoring and reporting of particles as total suspended particles (TSP), particles less than 10 micrometres in diameter (PM<sub>10</sub>) and particles less than 2.5 micrometres in diameter (PM<sub>2.5</sub>). Monitoring offsite will also continue but a new requirement is proposed for the provision of real-time public access to PM<sub>10</sub> and PM<sub>2.5</sub> data. The provision of real-time data is an approach consistent with other EPA licensed facility requirements and an addition to the licence requested by local community members.</p> <p>Quarterly and annual reports to the EPA will still be required and the EPA is committed to making these publicly available on the EPA website.</p> <p>The existing condition relating to truck cleaning is proposed to be maintained as this is effective for minimising dust and drag out associated with bulk tankers.</p>
<b>Stack emissions management, monitoring and reporting</b>	New and improved	U-749 U-718 U-754 U-748	<p>Under previous legislation, ABC was required to meet mandatory stack particle emission limits of 250 mg/m<sup>3</sup> except in circumstances which were beyond reasonable control. In 2016, new legislation, the <i>Environment Protection (Air Quality) Policy 2016</i> commenced, removing mandatory stack particle emission limits for all industry.</p>

Aspect	Change proposed	Reference	Explanation
			<p>These were replaced with a risk-based approach, focussed on achieving standards for ground level concentrations and allowing the EPA to set site-specific emission requirements to do so.</p> <p>The EPA proposes a new licence condition requiring development and implementation of a <i>Stack Particulate Management Plan</i>. The intention of this requirement is to ensure continuous monitoring of stack emissions and the establishment of triggers requiring action by ABC to reduce particulate emissions when these triggers are met. Reporting requirements include trend analysis and identification of opportunities to reduce frequency and duration of events where triggers are met, thereby driving continuous improvement.</p> <p>The EPA will continue to make reports publicly available on the EPA website.</p> <p>In addition to this, and based on the EPA's review and assessment of data, the EPA proposes stack particulate emission levels with a requirement to notify the EPA if these levels are exceeded. These are: 100 mg/m<sup>3</sup> for Stack A, and 60 mg/m<sup>3</sup> for Stack B, both based on a one hour average. It is intended that each notification will require evaluation of why levels were elevated and the corrective actions taken to return levels to below the reporting threshold(s).</p> <p>This proposed change is based on a comprehensive <i>Air Emissions Testing and Modelling Report</i> for the Birkenhead site which was recently reviewed and accepted by the EPA, as well as consideration of ABC's previous emissions performance.</p> <p>The current twice-yearly stack emission testing requirement is proposed to be maintained on the licence, as well as formalising the existing testing of chlorinated dioxins, furans, PM<sub>10</sub> and PM<sub>2.5</sub>, by adding these to the schedule.</p>
EIP	Improved	U-720 U-730	<p>In order to drive and support continuous improvement in ABC's environmental performance, the EPA will continue to impose the requirement for an <i>Environment Improvement Program</i> (EIP) on the licence. A significant proportion of the current EIP has been completed, however a number of compliance actions items are due for completion. ABC will commence operating under the new licence on 1 November 2017.</p> <p>ABC has identified actions through its recently completed noise assessments available on the EPA website. The EPA supports the identified actions and proposes that ABC incorporate these works into a revised EIP.</p>



Aspect	Change proposed	Reference	Explanation
			<p>The EPA's expectation is that a revised EIP will have a major focus on minimising fugitive dust emissions from the ABC site. This is because the modelling identifies these as the largest contributor to ground level dust impacts.</p> <p>In order to identify EIP actions the EPA proposes that ABC conduct an option assessment. Once the EPA has thoroughly reviewed the options assessment the agreed improvement actions will be added to a revised EIP.</p>
<b>Noise management</b>	New condition	S-88	Improvement actions in regards to noise management have been identified and are proposed to be included in the EIP. The EPA proposes to require a <i>Noise Management Plan</i> . It is the EPA's expectation that the noise management plan will include how ABC will manage noise on a day to day basis, as well as outline control measures that ABC plans to implement in the event that noise triggers or thresholds identified in the plan are exceeded.
<b>Waste management and transport</b>	Improved	S-166	Updated to a standard, modernised condition which sets out EPA expectations in relation to waste management and transport, consistent with other EPA licensed facilities.
<b>Spills management</b>	Improved	S-18 S-160 S-218	Updated to a standard, modernised condition which sets out EPA expectations in relation to spills management, consistent with other EPA licensed facilities.
<b>Use of alternate fuels and raw materials</b>	Improved	U-725	<p>The current conditions relating to alternative fuels will remain on the licence. The only amendment proposed at renewal is an update to the schedule which references 'Natural Gas' as an alternative fuel. This is not considered by the EPA as an alternative fuel as it is the main fuel source used by ABC.</p> <p>Recently ABC submitted a process change request to increase the allowable plastics content of 'wood derived fuel' or 'refuse derived fuel' from 10% to 20%. This application triggered public consultation and the process change request has not been finalised.</p>
<b>Complaints handling</b>	Existing	300-9	The existing detailed condition for complaints handling relevant to the ABC facility and operations has been maintained.
<b>Pollution control equipment maintenance</b>	Improved	S-2	Updated to a standard, modernised condition which sets out EPA expectations in relation to pollution control equipment maintenance, consistent with other EPA licensed facilities.
<b>Application and approval requirements from the EPA for changes to plant, equipment, processes</b>	Improved	A-5 A-6	<p>Updated to a standard, modernised condition and EPA licence condition.</p> <p>EPA approval is required where such proposed changes have the potential to increase, alter, relocate the point of discharge of pollutant(s) or waste, or increase the risk of environmental harm before such changes can take place.</p>

Aspect	Change proposed	Reference	Explanation
			<p>Applications such as these may also trigger EPA public notification processes under the Act if approval would result in a subsequent relaxation of licence conditions.</p> <p>It is important to note that the EPA usually supports applications from industry that will result in a net environmental benefit.</p>
<b>Community Engagement</b>	New condition	U-722	<p>The EPA supports ongoing community engagement by ABC. In alignment with the Objects of the Act – 'to promote industry and community education and involvement in decisions' the EPA proposes to require ABC to develop a community engagement plan.</p> <p>The content of the engagement plan should be determined by ABC in consultation with stakeholders to provide genuine engagement opportunities and flexibility in approach for both ABC and the community.</p>





## What changes are being considered?

The proposed new licence will ensure that existing aspects continue to be adequately addressed, with a renewed focus on controls around particle emissions, continuance of requirements to address noise, improved public access to monitoring data, and community engagement.

The EPA is proposing that ABC develop plans for the management of dust and noise, for approval by the EPA. It is also proposed that ABC continues to monitor its emissions, both on-site and off-site, using the results to identify improvements that can be made to its operations.

In addition, ABC will be required to develop a revised *Environment Improvement Program* with input from the community, along with a formal *Community Engagement Plan*.

A summary of the proposed conditions is provided in the internal pages of this fact sheet.

**The EPA is not relaxing or seeking to reduce any of the existing ABC licence conditions.**



### ABC's Environment Improvement Programs (EIPs)

The EPA is able to set licence conditions that require continuous improvements to be made at a facility. These are documented in an Environment Improvement Program (EIP).

ABC already has an existing requirement to develop and implement EIPs that addresses the emission of noise and dust as well as general housekeeping practices. Regular reporting to the EPA and community on progress occurs.

As a result, a number of improvements have been made over the last few years including:

- equipment upgrades to reduce noise and dust
- bitumen sealing of roads at the southern end of the plant
- greening of the western boundary
- water carts being used on stockpiles and access areas; and
- a new controller and particle detection system in the clinker cooler baghouse (completed in March 2017).

Upgrades to the gas conditioning towers that will improve dust collection in the electrostatic precipitators (the main stack pollution control equipment) are due before the new licence commences on 1 November 2017.

## Have your say

We want to hear from local residents about the changes that are proposed to ABC's licence conditions.

A summary of those changes is provided in this information sheet and you can view the full details on our website at [www.epa.sa.gov.au](http://www.epa.sa.gov.au) (or phone us on 8204 2004 to ask for a copy to be sent to you).

Submissions about the proposed conditions can be made in writing, either by post or email to:

Environment Protection Authority  
Compliance – Adelaide Brighton Cement  
GPO Box 2607  
Adelaide SA 5001  
[engage.epa@sa.gov.au](mailto:engage.epa@sa.gov.au)

**Submissions close 28 September 2017.**

## Next steps

The EPA will summarise all submissions and publish a summary on the website (personal details will not be published). The EPA will also publish our response to those submissions and provide them to ABC to respond.

The EPA will consider all feedback from the community, including previous information provided, together with any response from ABC before finalising the licence conditions.

This process may result in the final conditions being different to those currently proposed. Should this occur, the EPA will produce an explanatory document that will outline the reasons for any changes made following this consultation. **ABC will commence operating under the new licence on 1 November 2017.**

## Drop in to our info session for local residents

**Wednesday 20 September 2017  
6–9 pm - 'drop in' any time  
Folklore Café  
Mundy St, Port Adelaide**

This is an opportunity for members of the local community to speak one on one with staff from the EPA, SA Health, and Adelaide Brighton Cement about the proposed licence conditions for ABC's licence, which is due for renewal. ABC will commence operating under the new licence on 1 November 2017.

The session will provide you with an opportunity to ask questions, provide feedback and be informed about the licence renewal process.

If required, residents can obtain assistance on how to make a written submission at this session or by contacting the EPA before the closing date (28 September 2017).

Written submissions can be made either at the session, by using a reply paid envelope and submission template, or in writing via either email or letter at a later date before the consultation period closes.

### FURTHER INFORMATION

For further **EPA information** please contact:

Compliance Branch  
Environment Protection Authority  
GPO Box 2607, Adelaide SA 5001  
Telephone: (08) 8204 2004  
e: [engage.epa@sa.gov.au](mailto:engage.epa@sa.gov.au)  
[www.epa.sa.gov.au](http://www.epa.sa.gov.au)

(Follow the link at the bottom of our home page to Adelaide Brighton Cement license renewal).

For **Adelaide Brighton Cement** information please contact:

ABC switchboard: (08) 8300 0300 8:30 am to 5 pm weekdays  
24 hr hotline for operational issues (on-site supervisors) or leave a message to be contacted the next business day:  
Telephone: (08) 8300 0520  
e: [birkenheadcommunity@adbri.com.au](mailto:birkenheadcommunity@adbri.com.au)  
[www.adelaidebrightoncommunity.com.au](http://www.adelaidebrightoncommunity.com.au)

(Follow the link to environment & community)

