

Wed 11/05/2022 1:55 PM

[BULK] Take the Survey Form Submission

There has been a submission of the form Take the Survey through your NSW Environment Protection Authority website.

Name

spiro kavalieros

Organisation or business name

EHSR Group

Position (job title)

Director

email address

[REDACTED]

Which stakeholder group best describes you?

Industry

Do you support extending the summer petrol volatility period from 15 November - 15 March to 1 November - 31 March?

neither support or oppose

Do you support requiring older operations at EPA licensed industrial premises to meet the more stringent emission standards that apply to newer activities and plant?

strongly oppose

Comments

The RIS has failed to consider trade off and consumption costs in the implementation of the proposed new standard. Any end of pipe solution increases energy requirements – transfer of emissions to energy generators.

Baghouses are not effective in the removal of PM2.5. Bag houses are not

applicable for sources with high moisture content in stack gas.

The RIS has not considered mass rate vs concentration.

The RIS is not considering target for new equipment just end of pipe solutions.

Wood fired 30MW heat plant install ~\$30M and additional EOP ~\$5M (ESP). High moisture content discharge requires Wet ESP technology (~\$10M). Increased power consumption ~\$10-30K/Month.

Baghouse, ESP and Wet ESP are not effective in removal of gaseous pollutants required to meet Group 6 i.e. VOC's, NOx. Require RTO or RCO for effective removal of gaseous portion of pollutants in addition to ESP/Wet ESP.

The RIS has not considered primary, filterable or condensable PM fractions.

The RIS cannot detail where the cost accrues given market forces may not allow industry to pass on increases.

Do you support the transition period (by 2025 to 2030) for these older activities and plant to meet more stringent emission limits?

strongly support

Comments

while i oppose the tightening of emission limits for group 4 plant, if the proposal goes ahead i support the transition period method.

Do you support expanding the geographic area in which controls apply for the storage and transfer of volatile organic liquids to include the greater Newcastle and Wollongong metropolitan areas, so they are included in the area that requires petrol vapours to be captured during transfer of petrol between underground storage tanks and road tankers (the stage one zone in the Clean Air Regulation)?

neither support or oppose

Do you support the proposed new tightened emission limits and control requirements for all volatile organic liquid storage tanks, loading plant and tank vehicles regardless of age?

neither support or oppose

Do you have any other comments on the remake of the Clean Air Regulation?

The RIS is flawed and fails to use and reference current industry trends and data. Industry faces significant pressures to remain competitive. If plant and equipment (regardless of age) continues to meet standards imposed when installed, why should industry be forced to upgrade at a significant cost impost. Any end of pipe solution requires additional energy consumption. This transfers emissions collected to other regional centres via discharge from power generators.

Baghouses are no longer industry standard as they pose a significant fire/explosion risk where plant has high stack gas temperatures. They are not applicable where stack gas has a high moisture content (i.e. dryers, low temperature boilers and most wood fired heat recovery boilers).

What do you think are the most important sources of air pollution to address in Sydney?

transport and population

What do you think are the most important sources of air pollution to address in the Greater Metropolitan Region?

centralisation of people and industry in the GMR (sydney basin). Without decentralisation, the GMR will continue to be a pollution sink.