

Response to Questions of 2-4 February [SEC=UNCLASSIFIED]

Side 1 af 2

**Fra:** Madsen, Søren R. N.

**Sendt:** 11. februar 2009 08:56

**Til:** 'Reville, Barry'; Schou, Lone

**Cc:** Hermansen, Dorte; Jakobsen, Dorte Skjøtt; Hall, Damien

**Emne:** SV: Response to Questions of 2-4 February [SEC=UNCLASSIFIED]

**Vedhæftede filer:** Response to the NTN questions.pdf

Dear Barry and Damien

Here is the response regarding the questions of the emission from Kommunekemi.

It is Odense Environmental Center, who has med the respons.

Best regards

**Søren Madsen**

Head of Section, legal advisor.

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**Fra:** Reville, Barry [mailto:Barry.Reville@environment.gov.au]

**Sendt:** 11. februar 2009 05:19

**Til:** Schou, Lone

**Cc:** Madsen, Søren R. N.; Hermansen, Dorte; Jakobsen, Dorte Skjøtt; Hall, Damien

**Emne:** Response to Questions of 2-4 February [SEC=UNCLASSIFIED]

**Prioritet:** Høj

Dear Lone and Søren

In your email of 2 February 2009, you asked about past efforts to deal with the Orica HCB waste stockpile and also about the availability of other hazardous waste that might be available to help sustain a high temperature incineration facility.

You also asked in an email of 4 February 2009 whether the Australian Government has made any plans or considerations of what to do with the HCB waste at the Orica plant if export will not be possible.

Our answers are provided in Attachments A, B, C and D.

If there is anything further that you require, please do not hesitate to contact me or, in my absence (I will be in Nairobi from 12 to 23 February but should be in email contact) please contact Damien.

In addition, we would appreciate any advice that you might have on our earlier question regarding the claims made by the NTN in relation to (i) emission breaches and (ii) community objections from the Kommunekemi facility.

Best regards

Barry

<<Attachment A 110209.doc>> <<ATTACHMENT B to Email to Soren 110209.doc>> <<ATTACHMENT C to Email to Soren 110209.doc>> <<ATTACHMENT D to Email to Soren 100209.doc>>

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**Kommunekemi a/s. CVR-nr.: 34-48-44-14 & P-nr.: 1.003.042.669.  
 Comments from the National Toxics Network (NTN) to Kommunekemi's import of waste from Australia.**

In an e-mail on 23 January 2009 the Danish Environmental Protection Agency has asked Environment Centre Odense for comments on three issues of concern raised by the NTN regarding the import of Australian waste.

*Item 1.2 The location in Nyborg.*

The NTN states that in recent years Kommunekemi Nyborg has been the subject of continuous complaints of chemical odours.

This is incorrect. There have been a few complaints of odours in recent years. And Kommunekemi is continuously working on reducing obnoxious odours.

*Item 5.2 Insufficient measurements and monitoring of dioxin emissions from the incineration of hazardous waste.*

The NTN does not feel that dioxin emissions are monitored sufficiently. Measurements of dioxin at Danish incineration facilities, including Kommunekemi, employ the EN 1948 method. This is the recognized method for measuring dioxin throughout the EU.

Dioxin measurements at Kommunekemi for the last two years' are as follows:

	Incinerator F I	Incinerator F III	Incinerator F IV
2007 Dioxin (I-TEQ) ng/Nm <sup>3</sup>	0,0057	0,0022	0,0004
2007 Dioxin (I-TEQ) ng/Nm <sup>3</sup>	0.00049	0,018	0,0016
2008 Dioxin (I-TEQ) ng/Nm <sup>3</sup>	0,00011	0,00047	0,000014
2008 Dioxin (I-TEQ) ng/Nm <sup>3</sup>	0,0063	0,0020	0,002

The regulatory limit for dioxin is 0,1 ng/Nm<sup>3</sup> and thus the measurements show that Kommunekemi's incinerator emits between a fifth and as low as a hundredth of the regulatory limit.

Therefore Environment Centre Odense finds that it has been documented that Kommunekemi's incineration facility is in compliance with the regulatory limit for emissions of dioxin.

*Item 5.5 Disposal of fly ash*

NTN expresses concerns with the disposal of residues from Kommunekemi.

Slag and material from the cleaning of waste gases at Kommunekemi's incineration facility are disposed at Kommunekemi's own disposal site at Klintholm in Svendborg municipality.

The disposal site at Klintholm is divided into six sections. Two of these are closed, three receive slags and one section is divided into three cells which receive filter cake, ash and other waste, respectively. Leachates from all sections are controlled for a number of substances, such as heavy metals. It is only possible to collect leachate from the section where filter cake, ash and other waste are disposed.

The closed sections are covered with a top membrane, the units which receive slags are not covered with membranes, and the last cell is equipped with leachate recovery and clay membrane.

A new section was environmentally certified in October 2008. This section will be established and operated in accordance with the Landfill directive, which contains requirements for membranes and leachate recovery. The new section can receive both ash, filter cake, other hazardous waste and slags.