

**Madsen, Søren R. N.**

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**Fra:** Schou, Lone  
**Sendt:** 16. april 2009 10:40  
**Til:** Madsen, Søren R. N.  
**Cc:** Jakobsen, Dorte Skjøtt  
**Emne:** VS: SIA report on HCB destruction

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**Fra:** jo immig [mailto:evolve@joimmig.com]  
**Sendt:** 16. april 2009 03:01  
**Til:** Schou, Lone  
**Emne:** SIA report on HCB destruction

Dear Mrs/Dr Lone Schou

Further to our previous email we wish to advise you that Mr Trevor Bridle has confirmed there are factual errors in the SIA report regarding GPCR process and report quoted. Please read the letter below from Mr Bridle.  
Yours sincerely

Jo Immig

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**From:** Trevor Bridle [mailto:tbridle@ozemail.com.au]  
**Sent:** Wednesday, 15 April 2009 3:28 PM  
**To:** 'Stephen Thompson'  
**Cc:** 'Diana.Wright@environment.gov.au'; 'Doug Hallett'; 'Hall, Damien'  
**Subject:** RE: SIA report on HCB destruction

Stephen,

Further to my email to you dated 9 April, I have now had the opportunity to review the ELI Eco Logic report (Final Report, "Test Program at Full-Scale Unit- Gas Phase Chemical Reduction of Hexachlorobenzene using the Eco Logic Process", dated 30 July, 1999). It is this report that SIA reference as the source of information used to generate their evaluation of the GPCR process for HCB destruction, in the report prepared for the Dept of Environment, Water, Heritage and the Arts (DEWHA).

Based on my review of this ELI Eco Logic report I can now absolutely confirm that there are factual errors in the SIA report regarding the efficacy of the GPCR process to destroy HCB waste.

Consequently, I request that you correct your draft report accordingly, and specifically make corrections to sections 4.4.3 and 4.4.4 of your report, as initially requested in my letter to Minister Garrett, dated 26 February, 2009.

Actions required by SIA:

1. Revamp Section 4.4.3 of your report to reflect that the GPCR process has been used to treat mainly high-strength wastes and NOT low-strength wastes as reported. (see Comment 1 of my letter to Minister Garrett)
2. Rewrite Section 4.4.4 to correct the false statements that the GPCR process was not successful in treating HCB waste. Excerpts from the ELI Ecologic Report and the Kvaerner report are shown below. In the conclusions of the ELI report the following statement is made. *"Results of the trials indicated that the system can effectively desorbs approximately 98 percent of the waste input to the TRBP. In excess of 99.9999 percent of the HCB and chlorobenzene, and 99.9 percent of the PCDD/Fs, present in the waste were volatilised in the TRBP and swept to the reactor for destruction. Destruction efficiency measurements indicated at least 99.9999 percent destruction of HCB and total chlorobenzenes. The results of the testing showed that*

*hexachlorobenzene (HCB) can be effectively destroyed in a Gas Phase Chemical Reduction (GPCR) process". It is clear from this statement that the process was effective in desorbing essentially all of the HCB and other CPs in the TRBP and then destroying them in the reactor. In the conclusions of the Kvaerner report (Appendix A of the ELI report), the following statement is made. "Based upon on-site and off-site chemical analyses, the Eco Logic process safely and effectively destroys HCB wastes, leaving a residue resembling charcoal or coke that appears to weigh at most a few percent of the initial weight of HCB wastes. This confirms thermodynamic equilibria modelling of the chemical reduction reactions of HCB and related compounds by Kvaerner, as well as laboratory experiments by Orica and Eco Logic". I strongly recommend that these excerpts are used verbatim in section 4.4.4 of your report.*

I look forward to confirmation that these corrections have been made to your draft report to DEWHA.

Sincerely,

Trevor Bridle  
BRIDLE CONSULTING  
1B Primrose St  
Perth, WA 6000  
Phone 61 8 9328 2527  
Fax 61 8 9328 6763  
Mobile 0418 907 930  
Email [tbridle@ozemail.com.au](mailto:tbridle@ozemail.com.au)

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**From:** Stephen Thompson [<mailto:sthompson@siaustralia.com>]

**Sent:** Thursday, 9 April 2009 1:53 PM

**To:** Trevor Bridle

**Cc:** [Diana.Wright@environment.gov.au](mailto:Diana.Wright@environment.gov.au); Doug Hallett; Hall, Damien

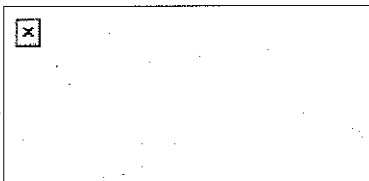
**Subject:** RE: SIA report on HCB destruction

Trevor

Thank you for your comments. Attached is a letter in response to the issues raised. Please feel free to contact me if there is any further detail you can provide.

Regards

Stephen Thompson



Stephen Thompson: Director  
Sustainable Infrastructure Australia

**Email:** [sthompson@siaustralia.com](mailto:sthompson@siaustralia.com) P:02 9923 2130 F:02 9929 7232 M:0438 24:550

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**From:** Trevor Bridle [<mailto:tbridle@ozemail.com.au>]

**Sent:** Thursday, 2 April 2009 11:38 AM

**To:** Stephen Thompson

**Cc:** [Diana.Wright@environment.gov.au](mailto:Diana.Wright@environment.gov.au); 'Doug Hallett'

**Subject:** RE: SIA report on HCB destruction

Stephen,

Thanks for your prompt response.

All is now clear to me as to why I never received the letter..

Unfortunately you sent the letter to ESI and not to my consulting company, even though in Appendix 3 you indicate that Bridle Consulting was a stakeholder in the review process!!!.

I resigned from ESI in November 2004 and the company went into receivership soon thereafter.

Consequently the letter would never have been redirected to me at Bridle Consulting.

It is a real pity that I did not have the opportunity to comment on your assessment of the GPCR process as I am sure many of the inaccuracies in your report would have been corrected.

An important example is the presence of dioxins in the one HCB destruction run where the capacity of the scrubber system was exceeded with a bleed-through of chlorine, which caused the measurable dioxin level, was recorded. Had this explanation been included the report the exemplary record of the process would have remained intact.

Diana, can your Department make amendments/clarifications to the report to reflect some of these

issues and specifically note that Bridle Consulting did NOT provide input to the report (See Appendix 3 of the report).

Sincerely,  
Trevor Bridle  
BRIDLE CONSULTING  
1B Primrose St  
Perth, WA 6000  
Phone 61 8 9328 2527  
Fax 61 8 9328 6763  
Mobile 0418 907 930  
Email [tbridle@ozemail.com.au](mailto:tbridle@ozemail.com.au)

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**From:** Stephen Thompson [<mailto:sthompson@siaustralia.com>]

**Sent:** Thursday, 2 April 2009 8:09 AM

**To:** Trevor Bridle

**Cc:** [Diana.Wright@environment.gov.au](mailto:Diana.Wright@environment.gov.au); Doug Hallett

**Subject:** RE: SIA report on HCB destruction

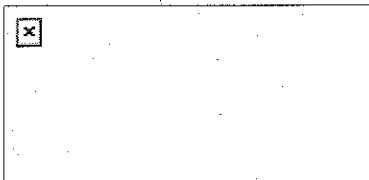
Trevor

Thank you for your email. A copy of the letter that was sent is attached for reference.

If you have any further queries please feel free to contact me.

Regards

Stephen Thompson



Stephen Thompson: Director  
Sustainable Infrastructure Australia

**Email:** [sthompson@siaustralia.com](mailto:sthompson@siaustralia.com) **P:02 9923 2130 F:02 9929 7232 M:0438 24:550**

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**From:** Trevor Bridle [<mailto:tbridle@ozemail.com.au>]

**Sent:** Wednesday, 1 April 2009 4:10 PM

**To:** Stephen Thompson

**Cc:** [Diana.Wright@environment.gov.au](mailto:Diana.Wright@environment.gov.au); Doug Hallett

**Subject:** SIA report on HCB destruction

Stephen,

I have just received a letter from Diana Wright regarding my comments, to the Minister, on the SIA assessment of the GPCR process to destroy HCB wastes.

She informed me that SIA wrote to me on 11 June 2008 asking me to review your draft report.

My records show no receipt of this letter. I do recall a phone call from SIA on the issue but I am sure I never received a copy of the report. Also, I cannot find any record of a written response from me to SIA on this issue.

Does SIA have any records relating to this issue?

Sincerely,

Trevor Bridle  
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