

Fra: Schou, Lone
Sendt: 15. januar 2009 12:38
Til: Jakobsen, Dorte Skjøtt
Emne: VS: PCB waste from Australia to be shipped to Denmark? [SEC=UNCLASSIFIED]

Vedhæftede filer: Response to Danish EPA 150109 pm.doc
til sagen - tak

Fra: Reville, Barry [mailto:Barry.Reville@environment.gov.au]
Sendt: 15. januar 2009 11:58
Til: Madsen, Søren R. N.
Cc: Schou, Lone; Hall, Damien
Emne: RE: PCB waste from Australia to be shipped to Denmark? [SEC=UNCLASSIFIED]

Dear Søren

Thank you for your e-mail regarding Professor Reuter's comments. Our apologies for not replying faster to Lone's questions from 19 December and your question of 3 December regarding public release of the SIA report.

I will deal with these issues in turn.

(i) Professor Reuter has raised the issue of the Ausmelt technology being able to treat Orica's waste stockpile but has referred to this as being PCB waste, not HCB waste. I don't know whether he is genuinely confused about the nature of the waste or whether he mistakenly typed PCB rather than HCB in his email.

Whether he meant PCB or HCB, the Ausmelt process has been discussed at length in the SIA report.

Australia has several facilities licensed to deal with PCBs and we deal not only with our own PCBs but also often import them on request from surrounding countries which do not have the capacity to deal with them. Different technologies are employed at different facilities. All these technologies, including the Ausmelt process, have been assessed by SIA in its report that we have provided to you. SIA concluded that "there are no technologies available in Australia at the present time or in the foreseeable future capable of destruction or acceptable treatment of the Orica HCB Botany stockpile in an environmentally sound manner."

Also, you will be aware from Damien's e-mail of 22 December that Ausmelt has closed its facility at Whyalla, South Australia.

(ii) With regard to Lone's questions of 19 December, our responses are provided in the attached file. If you need more information on these matters, please let me know.

(iii) You have asked about whether the SIA report could be publicly released. For legal reasons of possible commercial-in-confidence material within the report, we were advised to consult the companies which had provided information to see whether they had concerns about the release of the report to the public.

This has taken longer than expected. None of the concerns expressed by the companies affect the overall conclusions of the SIA report, but there is a concern by some that there could be misinterpretation in the public domain over capabilities in dealing with non-HCB hazardous wastes which might lose potential customers and have financial consequences.

We are expecting more information on this tomorrow and will brief you more fully then. Our hope is that it will be possible to have the SIA report publicly released but it may need some accompanying material or slight adjustment to reassure some of the companies. If possible, please do not release the current version of the SIA report yet.

I hope that this information helps. We appreciate your patience and will get back to you tomorrow with

further advice about the issues regarding the release of the report.

Best regards

Barry

Dr Barry Reville
Assistant Secretary
Environment Protection Branch
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601
Australia

Ph +61 (0)2 6274 1622

Fax +61 (0)2 6274 1164

barry.reville@environment.gov.au

From: Madsen, Søren R. N. [mailto:sornm@mst.dk]
Sent: Wednesday, 14 January 2009 11:15 PM
To: Reville, Barry; Hall, Damien
Cc: Schou, Lone
Subject: VS: PCB waste from Australia to be shipped to Denmark?

Dear Barry and Damien

The Danish EPA has received a mail from Ausmelt, regarding treatment of PCB waste (enclosed below). In the mail Ausmelt claims, that Australia has the capacity to treat PCB.

The Danish EPA would like to know, whether this information affects the analysis of Australias ability to treat the HCB waste?

Beside this, would we like to know, when we can expect an answer on our previous questions. We have pushed the deadline once, and we are being pressured for an answer from the journalist.

Best regards

Søren Madsen
Head of Section, legal advisor.
Soil & Waste
Mail: sornm@mst.dk
Dir. tlf. : (+45) 72 54 41 40

Danish Environmental Protection Agency
Strandgade 29
DK-1401 København K
Tlf.: (+45) 72 54 40 00
www.mst.dk

Fra: Markus Reuter [mailto:Markus.Reuter@ausmelt.com.au]
Sent: 30. december 2008 11:44

Til: MST Miljøstyrelsens hovedpostkasse
Cc: Nielsen, Jenny Bøving; MIM - Miljøministeriets Informationscenter
Emne: PCB waste from Australia to be shipped to Denmark?

Dear Mr. Ole Christiansen

I believe Orica's PCB waste from Australia could be treated in Denmark.

I would like to inform you that there is technology available in Australia to treat this waste, but over many years this option has been shunned.

Ausmelt has built ca. 50 plants globally to produce metals as well as recycle materials (see website), even smelting bottom ash in Seoul's waste-to-energy incineration plant.

I add a document in this regard to this email for your information. I trust you have now been informed.

Kind regards

Professor Markus A. Reuter (*Ph.D., Dr. habil. D.Eng., FIEAust, Pr. Eng.(ZA)*)

Chief Executive Technologist

Ausmelt Limited, 12 Kitchen Road, 3175 Melbourne, Victoria, Australia. www.ausmelt.com.au +61 3 8792 7402(T), +61 3 9794 9411 (F)

Professorial Fellow, University of Melbourne, Melbourne, Australia.

Emeritus Professor, Delft University of Technology, Delft, The Netherlands.

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RESPONSE TO DANISH EPA QUESTIONS
FROM E-MAIL OF 19 DECEMBER 2009

(1) Repackaging:

In the DRR it is said that “once repackaged, new drums can be stored or transported within a five-year timeframe before re-drumming is required” and in the SIA report page 10 it is said “the requirement to repackage the existing HCB waste stockpile every eighteen month....” These two numbers have given us some problems – can you explain the difference?

Orica has been undertaking the repackaging of the HCB waste in batches every 18 months so that over a five year period all wastes in the stockpile are repackaged. So the reference to the repackaging in the SIA report refers to this “campaign schedule” for the entire stockpile, rather than each drum being repackaged every 18 months.

The comment in the report (section 4.1) to “a five-year timeframe before re-drumming is required” refers to the licensing requirement for transporting dangerous goods which considers that the packaging of an individual drum is safe only for five years and must then be repackaged.

Taken together, the two comments mean that the packaging of an individual drum lasts for five years and Orica, by working in 18 month batches, is able to complete repackaging of the entire stockpile within five years. It then has to begin the cycle over again by redrumming the drums from the first batch to keep them within the five year limit for an individual drum.

2) Amount of Australian Hazardous Waste:

In the DRR it is said that the production of hazardous waste from chemical industry is quite small – do you have numbers on that?

It has been estimated (by GHD Australia) that the combined capacity for treating chlorinated wastes within Australia is approximately 2,000 tonnes per annum.

This capacity is adequate to treat the ongoing generation of chlorinated waste within Australia

3) ToxFree:

At page 4 at the DRR it is said that if you would expand the current capacity of the existing ToxFree facility that the EIS process “... would take considerable time and face significant technical and permitting hurdles”. Do you any estimate on “considerable time” ?

The ToxFree facility is dealt with in greater detail in the SIA report in section 4.6 on High Temperature Incineration (HTI). SIA considers that it is “not feasible that the HTI process can be developed in Australia within a reasonable time frame to treat the Orica HCB waste stockpile.” Overall, SIA considers that developing a suitable HTI facility would take six years and most likely more.

SIA points out that, if ToxFree had the secure waste storage and handling systems, the emission controls and the licence – none of which it has – and could overcome the other technical problems which are described in section 4.6, it might be able to destroy the 16,000 tonnes HCB waste stream in 30 years.

4) Co-feeding:

– the problem of getting the large quantities of low heating waste for co-feeding – Is this a problem both if the ToxFree facility is expanded as well as if a new HTI is build?

Yes, the problem of getting the large quantities of low heating waste for co-feeding is the same problem if (a) the ToxFree facility is expanded and (b) if a new HTI is built. This is described in section 4.6 of the SIA report.

5) Treatment of Part of Stockpile:

5a) And then a question which does not have a direct link to the DRR but is more general – Orica has asked for export of all the waste at the facility, but why is not a part of the waste treated at the GeoMelt facilities or the Ausmelt facility?

There is no GeoMelt facility operating in Australia.

Since the completion of the SIA report, Ausmelt has announced the closure of its facility in Whyalla, South Australia which had been treating metallic wastes and was considered by SIA for its potential to treat the Orica HCB waste stockpile.

5b) As I read the SIA report GeoMelt fail in the feasibility study due to “scale and time to treat the waste” and “emissions and residues” and “Permit” but will it also fail if only a smaller amount and some of the waste with a lower HCB content (the contaminated packages) are treated?

There is no GeoMelt facility operating in Australia.

In addition, it is impractical for the waste to be separated. There are some limits to combustible load and, as such, it would not be feasible to feed PPE, timber, etc. directly into a GeoMelt process.

5c) And could a smaller amount of the waste be treated at the Ausmelt facility even though there are problems with the pre-treatment?

Since the completion of the SIA report, Ausmelt has announced the closure of its facility in Whyalla, South Australia.