



Response to Submissions

Innova's Works Approval Application (WA66832)

Mr Ben Willis
Dr John Lucas

22 March 2011

Introduction

Innova thanks residents for providing well considered and thoughtful submissions. Some of the submissions are technical and we assume some have been made by organisations operating in the soil remediation industry. This document is a collective response to all submissions.

In this response we have endeavoured to provide an overall response (Part 1) to some of the commonly expressed concerns and then we have provided detailed responses to individual submissions (Part 2).

Innova's proposal is to establish a Centre for Site Remediation (CSR) on the Dow Chemical site in the Altona Petrochemical Complex. Such a facility is much needed as there is currently no way to remediate low-grade contaminated soil and leave no harmful residue. Without this facility sites will remain un-remediated (and thus unusable) or soils would have to be contained or dumped. Our CSR would provide industry with an option to remediate small to medium volumes of soil in an effective and safe manner.

The CSR has been designed to minimise any impact on residents. The site has partly been chosen because of the highly appropriate facilities (including safety facilities) and partly because of its road access. Trucks would use only major roads and would pass only industrial neighbours.

We know that residents don't want to have to contend with dust: that's why we've designed the CSR so that soil is received indoors. All tipping and processing of contaminated soil occurs in a sealed building so residents and our industrial neighbours won't have to contend with dust.

Noise is also an issue of concern. While we have not been able to eliminate noise, we have learned (particularly from our experience at Springvale) how to reduce it to a level that is below ambient day-time noise and within the range of ambient night time noise. Our personnel will be trained to be sensitive to the need to minimise noise, for example to use only one front end loader at night and not to rev its engines. We will establish a 24 hour phone line so any resident who is concerned can phone and have the issue dealt with immediately.

Our technology has been engineered to produce no residue (other than clean soil, water and carbon dioxide) and minimal emissions. Emission levels are well below EPA and international standards and residents will have no impact from odour.

Innova is committed to being a part of the community; not only to improving the environment by cleaning but also providing jobs, engaging with community projects and working through a consultative committee to report to the community and address any concerns.

Parts 1 and 2 below contained responses to specific concerns.

Part 1 – General comments capturing some of the themes across the submissions

Part 2 – Detailed responses to individual submissions

Part 1 – General Comments

History

Many of the submissions make residents' resentment of Altona's industrial history very clear. We note that many objections are actually to past activity and ongoing activity of other businesses. We empathise with these feelings and objections to any further damage to the local environment. We implore residents to separate the harm that has been caused in the past from what we are trying to achieve now.

Innova understands that residents want clean air, water and soil. We all do. That's one of the reasons why we at Innova developed our soil remediation technology. We want to contribute to the clean up – not make the environment worse. Our process feeds heat back into the system so we minimise energy use. We have designed our processes to produce no residue. From end to end the system has been designed to minimise environmental harm while cleaning up contaminated soils.

Our technology minimises environmental impact. We have designed the Centre for Soil Remediation (CSR) to minimise impact on people. That's why the contaminated soil is brought into a shed, that's why it's sealed and air is filtered before being discharged. We've engineered the process and CSR to maximise environmental benefit and minimise impact on people.

Many submissions acknowledge that soil remediation is a social good – a number more acknowledge that Innova's process is safe and clean. Most objections seem to focus on the transport of soil, or question why the plant can't be moved for every job.

Transport

We acknowledge concerns about soil transport and have put mitigation plans in place. Transport will only be in properly EPA approved vehicles. Transport will only occur between the hours of 8:00 am and 6:00 pm. Trucks will use the M1, Grieve Parade and Kororoit Creek Road – they will not use residential streets. We will establish a 24 hour phone line so that residents can call any time and speak to a person who can address the reason for the call.

We also acknowledge that residents' would prefer us only to clean up Altona. Innova commits to prioritising clients in the West but we cannot commit to only taking soils from Altona.

A number of submissions note that Innova has previously relocated its plant to remediate sites. This is true and only possible in certain circumstances. The first requirement is space – the plant is large and simply will not fit on small sites. For example, we could never remediate an old petrol station unless there were acres of vacant land adjacent to the site and available for our use. The second requirement is gas supply. We cannot use the regular domestic supply so the infrastructure to deliver the necessary gas must be available or constructed. Finally, we need the facilities to ensure that operations are safe and have no impact on residents. The Dow site provides everything that is required.

All industries face the challenges of road safety when transporting goods. Innova is committed to ensuring all vehicles used for the transportation are safe and well maintained and that all transportation is carried out safely. All transport will follow road rules and particularly those relating to heavy vehicle driver fatigue and drugs and alcohol.

For this proposal to establish a CSR it is difficult to estimate the risk of accident or exposure during *transportation* of soils. On the roads there is always risk of accident and an accident could result in a soil spill. However, the dangers associated with such a spill are minimal.

Although contaminated, the soil is mainly solid, the hydrocarbon contaminant is at about a one per cent level, in general, so it's very dilute. Contaminants are "embedded" in the solid matrix and adsorbed onto the soil grains – it is no means a free flowing liquid. The contaminant is "stuck to the soil" so if we have a truck spill or accident the soil will essentially remain as a pile. Of course there needs to be a suitable and fast Environmental Response Plan to ensure that the soil is contained, covered, recovered and that there is no impact on the environment.

The risk to the public is considerably lower than an accident involving a tanker transporting liquid chemicals or fuels. We know that this is far more difficult to manage, because of the free-flowing nature of the liquid chemical. With the good work of expert HazMat teams we are able to manage our liquid spills. The same management will be possible for any solid spills.

As a caveat, establishment of suitable a CSR such as that proposed by Innova will allow for any soils impacted by a fuel spill in the area to be suitably dealt with. Innova would happily work with authorities, through a proposed Community Reference Group, to devise suitable Emergency Response Plans that would see provision of world class environmental protection measures.

Soils

Some residents believe the facility would handle all of Victoria's contaminated soil. This is not the case. We do not remediate all types of contaminated soil. The demand for remediation is so high that we will only be able to remediate a proportion of the types of contamination our plant is designed for.

Soils we cannot remediate will not be accepted.

If we are granted a permit, the types of soils we can remediate will be limited. Where the contaminants in those soils are more concentrated than we have previously handled, we will conduct a proof of performance (POP) test. There are specified procedures for POP tests and these are safe and effective. POP tests would also be required for new contaminants. Only organic/hydrocarbon contaminants will be considered for POP testing. Innova commits to making its POP test results available for public scrutiny – and indeed for the whole process to be monitored.

Monitoring

If Innova is granted a permit it will establish a Community Reference Group. Residents, representatives of the EPA and council and members of environmental groups will be invited to nominate for the group. The group will receive operational and incident reports and be consulted about POP testing and the overall operation of the CSR. It will provide information to the wider community and process applications from the community for support for projects.

All group activities will be in addition to and on top of legislative reporting requirements.

Consultation

Some submissions are critical of Innova's consultation program and we're disappointed because Innova has committed considerable resources to consultation with the community regarding its CSR proposal. A list of specific activities appears below:

- meet with Council officers and Councillors
- issued media releases
- advertised in local papers
- held information session at "Habitat Trust"
- held on site tours
- established "bang the table" website
- presented to the ACNCG
- presented to Dow employees
- answered questions from union health and safety representatives
- offered briefings to local industry
- briefed local MP's
- offered brief to Federal MP
- briefed EnviroWest and Habitat Trust

We understand that some residents may not have seen notices or attend events and we are sorry that they were not able to participate.

We have also been accused of 'spin' in relation to our activities. We have had very supportive responses from

- ACNCG
- EnviroWest
- Habitat Trust

Each of these groups has provided us with support for our proposal. There was minimal objection at Habitat Trust session and there has been little activity on the "bang the table" website.

These facts are the basis of our claims.

Employee health and safety

Innova is committed to protecting the health and safety of its employees and those in neighbouring businesses. Our philosophy is to minimise harm to people while maximising benefit to the environment. We have designed our process to be safe for the broader community and workers in businesses near by. Our own staff will need personal protective equipment (PPE) in some circumstances. We are committed to working with WorkSafe and unions to minimise the need for PPE because we understand that it's the last resort.

Track Record

Springvale Project

Innova's environmental performance on the Springvale project was exceptional and was extensively monitored by:

- Independent EPA accredited Industrial Facilities Auditor
- Independent EPA accredited Contaminated Sites Auditor
- Independent emissions testing carried out by a NATA accredited Emissions testing consultant. (nine independent emissions tests were conducted during the project)
- Independent monitoring of ambient air quality carried out by a NATA accredited air quality consultant
- Independent environmental consultant
- Continuous Emissions Monitoring System Data (audited by the industrial facilities auditor)

- DFTD plant data (audited by the industrial facilities auditor)

The results of all monitoring of Innova's operation found Innova's performance during the Springvale project not only met but surpassed EPA standards.

In March 2009 the then Minister for the Environment issued a statement about the Springvale project:

"Environment and Climate Change Minister Gavin Jennings said a process called 'thermal desorption' was used to treat the soil on the Springvale site providing a new option for landowners and avoiding sending contaminated soil to landfill.

"We are confident we now have a viable, safe and cost-effective method for treating polluted soil based on soil sample results provided to EPA Victoria," Mr Jennings said.

"This is the first time the technology has been used in Australia to treat soil contaminated with PCBs (Polychlorinated biphenyls).

"Independent monitoring conducted throughout the three month operation and testing of on-site soil at the completion of the process showed the technology was effective in treating PCBs with no reports of any disruption to neighbours."

Springvale was a great achievement for Innova. Over 21,000 tonnes of soils (that otherwise would have remained in place or taken to landfill) was totally beneficially re-used. Over 380 independent soil samples were taken on the processed soil – not one failed, indeed all the samples had removed the contaminant to the analysis non-detection limit. We are proud of our technology and our capability and we believe we can make a positive difference to the state of the environment – that's why we are proposing the CSR.

PART 2

Detailed responses

Submission 1 - Hobsons Bay Ratepayers Association

	Comment / Concern	Innova's Response
1.1	The Hobsons Bay Community do not understand the need for a single processing plant to be used to process all of Victoria's Wastes. (pg 2)	<p>Innova proposes to establish a Centre for Site Remediation in order to provide a remediation alternative to land fill for the remediation of hydrocarbon contaminated soil on sites where on site remediation is not possible. Innova believes the Dow site is the ideal location for the Centre for Site Remediation as it is close proximity to a large number of contaminated sites and is within a heavy industrial area with the infrastructure required including extensive road networks allowing soil to be transported without impacting on the local community.</p> <p>A single plant will not process all of the contaminated soil in Victoria for reasons of (i) Capacity and (ii) there are several other proposals for soil treatment (one such has been approved for the eastern suburbs).</p> <p>For Innova's Centre, it is anticipated that soils will come from Melbourne's Western Suburbs, particularly when a similar Centre has been approved in the eastern suburbs in Dandenong. It is noted that Hobson's Bay (West) and Dandenong (East) Council Areas sit as no. 1 and no. 2 respectively in terms of the number of sites on the EPA's Contaminated Sites Register.</p>
1.2	IST plant and equipment is outdated- over 10 years old and superseded by more efficient units. (pg 5)	<p>The DFTD process is cutting edge, developed from research conducted at in the Faculty of Engineering at Newcastle University (a top 10 Australian University), Australian designed and built and Innova is proud of this. DFTD represents best process available for the remediation of hydrocarbon contaminated soil, ensuring:</p> <ul style="list-style-type: none"> • Best practice control of emissions and • Effective removal of contaminant • Reliable, safe and stable operation.
1.3	Key personnel are leaving or have left as the company is bordering on insolvency. If not insolvent- shareholders have invested millions in a plant now worth scrap value. (pg 5)	<p>Innova is not insolvent. Innova has proudly developed this world class technology from cutting edge research here in Australia The company holds Patents in US, Canada and Europe for its technology. Yes a lot of money has been invested as is the nature of cutting edge developments.</p> <p>Like all businesses personnel will come and go for a range of reasons family commitments or career progression etc. Innova retains its core personnel and skills and is committed to recruitment and training; an approved Centre will generate local</p>

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		<p>jobs.</p> <p>Following successful CSR operations, Innova hopes to manufacture and export its process plants to other countries –more employment opportunity.</p>
1.4	<p>IST moved its equipment from NSW to Victoria as it could not get an operating permit in NSW. (pg 5)</p>	<p>This assertion is incorrect. Innova has held operating permits in NSW and has never had an application rejected. Indeed two of its operations in NSW involvement transportation from a site, treatment and return to the original site as clean material. The operations were totally successful, compliant and to the satisfaction of legislators, client and all stakeholders. Innova remains active in remediation in NSW.</p>
1.5	<p>IST treated soil in Melbourne still had some dioxins present in its discharge stack. As contamination levels at Springvale were low, the heat treatment processes abilities were not proven at higher contaminant levels. (pg 5)</p>	<p>Innova does not propose to treat any soil with contaminant levels higher than those previously treated without conducting a proof of performance (POP) test, monitored under the watchful eye of qualified independent experts and EPA scientists. Our policy has always been that we will demonstrate our technologies capability to stakeholders satisfaction before being allowed to continue - we bare the risk – if we don't pass we pack up and go. That is what we agreed to at Springvale - we passed the emissions test, not once, but NINE times where Dioxins were 10 to 100 times less than the compliance level. This program of testing was the most stringent of any such operation in the world.</p>
1.6	<p>The heat treatment process is identical to that used by Thiess on the Hailfax St. gasworks site in Adelaide except that the Thiess plant was run on a batch process and IST is operating under a licence from Thiess. (pg 5)</p>	<p>Innova's process is nothing like that used by Thiess on the Halifax gasworks – Thiess's is a batch unit were the soil is heated in a "hut" enclosure. Innova's process is a continuous process and has significant operational, emission control and efficiency advantages over batch units.</p> <p>Innova owns its process and does not licence it from anyone. Innova has designed, built and operated the DFTD process</p>
1.7	<p>It is proposed to house the treatment plant in a disused building on site eliminating many of the issues pertaining to dust and amenity issues that plague this companies operations during its testing phases in NSW and Victoria. (pg. 5)</p>	<p>Innova propose to store all contaminated soil within an enclosed building in order to eliminate any risk of dust and odour from contaminated soil. While Innova has never had an issue with dust on previous projects (<i>nor</i> any complaints) we believe that the storage of all contaminated soil within an enclosed building represents best practice. Innova's previous operations have not resulted in any environmental or health issues and have been subject to extensive environmental monitoring and open consultation and review</p> <ul style="list-style-type: none"> • Innova have never exceeded any EPA (NSW or Victoria) emissions criteria – our operations have been well and truly compliant. • Innova have never had soil processed by the DFTD process fail to meet EPA (NSW

	Comment / Concern	Innova's Response
		<p>or Victorian) remediation criteria.</p> <ul style="list-style-type: none"> Innova has never received a complaint from the community during any of its projects.
1.8	<p>Because of the lack of operating information from the process on specific site chemicals, the lack of any long term operational performance by the new Thermal Treatment Process and because of poor performance by Innova on the Springvale site community call on the state government to grant a planning permit to conduct a proof of performance (POP) trial at the Altona site of (say) 500 Tonnes of contaminated waste from the site. This contaminated waste must be material that is representative of all the contaminated materials that are present on the DOW site or if there is more than one type of contamination hot spots, that each hot spot be the subject of a POP trial.</p> <p>The POP trial(s) using the Dow site contaminated waste must be monitored under the watchful eye of qualified independent experts and EPA scientists. The purpose of the POP trials is to test the representative samples of the contaminated materials that are present on the site to determine if plant emissions are likely to determine what effect the thermal degradation has on the hydrocarbons, heavy metals, asbestos, etc. and to determine if plant emissions are likely to impact on Hobsons bay residents. Testing to include dust monitoring, particularly PM2 and PM10 particulates, asbestos dust emissions, stack analysis, fugitive emissions monitoring while controlling process water, ground water, dust, stockpile and traffic management on the site.</p> <p>Note. It must be specified that at no time MUST any material, other than the contaminated soil from the premises, be treated, processed or reprocessed at the premises.</p> <p>The results of the POP trial(s) must then be submitted to independent experts to determine whether it is safe to proceed with the full scale clean up process on site at the Dow site in Altona. At the end of the trial, and after the completion of an investigation of the results of the trial by independent experts and EPA scientists, providing that no issue is</p>	<p>Treatment of Only Contaminated Soil Sourced From The Dow Site</p> <p>Innova most certainly agrees to the notion of conducting POP Trials as suggested. However this should not be restricted to contaminated soil from only the Dow site; it should apply to soils from other sites, containing substances that Innova could treat but has not done so as yet. Innova most certainly agrees that the results of POP trial(s) be submitted to independent experts to determine whether it is safe to proceed with the full scale clean up project. <u>Indeed, Innova wholly supports the notion of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u> Innova has always been and always will be open and transparent in all aspects of its operations.</p> <p>Lack of operating data</p> <p>Innova has extensive operating information collected during previous projects on a range of soil contaminants. This information has been included in Innova's Works Approval application.</p> <p>Springvale Project</p> <p>Innova's environmental performance on the Springvale project was exceptional and was extensively monitored by:</p> <ul style="list-style-type: none"> Independent EPA accredited Industrial Facilities Auditor. Independent EPA accredited Contaminated Sites Auditor. Independent emissions testing carried out by a NATA accredited Emissions testing consultant. (9 independent emissions tests were conducted during the project's duration) Independent Monitoring of ambient air quality carried out by a NATA accredited air quality consultant. Independent Environmental consultant Continuous Emissions Monitoring System Data (Audited by the Industrial facilities auditor) DFTD plant Data (Audited by the Industrial facilities auditor) <p>The results of all monitoring of Innova's operation found Innova's performance during</p>

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	<p>identified that will impact on the health safety and amenity of the Hobsons Bay Residents, and after community consultation, that a planning permit be granted by the responsible authority to allow the contaminated material present on the Dow site to be fully treated using the thermal degradation process.</p> <p>When the site cleanup at the Dow site has been completed, Innova Soil Treatment to remove all their equipment and any residues of their on site works from the site to the satisfaction of the Responsible Authority (Pg.5-6)</p>	<p>the Springvale project not only met EPA requirements but Innova's demonstrated performance exceeded the EPA requirements.</p> <p>In March 2009 the then Minister for the Environment, Gavin Jennings, issued a statement about the Springvale project – a copy is reproduced below.</p> <p>Springvale was a great achievement for Innova. Over 21,000 tonnes of soils (that otherwise would have remained in place or taken to landfill) was totally beneficially re-used. Over 380 independent soil samples were taken on the processed soil – not one failed, indeed all the samples had removed the contaminant to below the analysis non-detection limit. We are proud of a technology and our capability and we believe we can make a positive difference to the state of the environment – that's why we are proposing the CSR.</p> <p>POP Test</p> <p>Innova agrees that prior to any contaminated soil treatment Innova must prove both to the EPA and community that it is capable of safely and effectively treating the contaminated soil without risk to the community or environment. Innova has proposed that before any contaminated soil is treated which has a composition different to that already demonstrated by Innova, a proof of performance test be conducted to demonstrate that the soil can be remediated safely and without risk to the environment. Such pop testing must be monitored under the watchful eye of qualified independent experts and EPA scientists that may form part of a Community Reference Group (CRG).</p>
1.9	<p>Has a demonstration trial been conducted to test that the DOW site that is heavily contaminated with many complex and long chained hydrocarbons is able to be safely processed in the Thermal desorption process (pg 6)</p>	<p>Innova agrees that prior to any contaminated soil treatment Innova must prove both to the EPA and community that it is capable of safely and effectively treating the contaminated soil without risk to the community or environment. Innova has proposed that before any contaminated soil is treated which has a composition different to that already demonstrated by Innova, a proof of performance test be conducted to demonstrate that the soil can be remediated safely and without risk to the environment. Such pop testing must be monitored under the watchful eye of qualified independent experts and EPA scientists that may form part of a Community Reference Group (CRG).</p>
1.10	<p>What impact on the environment by the thermal treatment of some of these nasty chemicals and where is the proof that the Innova thermal</p>	<p>The operation of Innova's Centre for Site remediation will have no impact on the health safety and amenity of Hobsons Bay Residents. Innova has demonstrated during it's</p>

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	processing plant will treat these chemicals in a way that does not impact on the health, safety and amenity of the local community (pg 6)	previous operations that there will be no impact on local residents and is committed to a program of performance testing to further demonstrated that there is no risk to local residents or the environment.
1.11	Has the site been contaminated with other organic or heavy metal contaminants over the life of the site which have not yet been identified. (pg 6)	Prior to the remediation of contaminated soils from any site extensive environmental assessment and testing is conducted. Innova also conduct in house laboratory testing to ensure all contaminants are identified.
1.12	Is the building that is proposed to house the processing plant large enough to store large stockpile of contaminated/partially contaminated/treated material that will be required to be stored during the process (pg 7)	Innova proposes to store a maximum of 5000T of contaminated soil within the building. This is the maximum amount of contaminated soil which could be on site at any one time and can be safely contained and handled within the building. Innova does not propose to store any contaminated soil outside the confines of the building
1.13	Where will the treated soil be used after the processing is completed (pg 7)	Soil which has been remediated using the DFTD process is tested by independent environmental consultants to ensure it is free of contaminant and safe for beneficial reuse without risk to health or the environment. Potential areas for reuse of clean fill produced could be, for example,: Clean fill for use in construction and landscaping applications; Backfill at the site undergoing remediation; Road base material; Car parks; Golf course / sporting field fill material; and Rehabilitation of quarry and mine sites.
1.14	Are the treated soil be used in local community reserves. (pg 7)	The soil treated by the CSR and tested and proven to be safe for reuse by independent environmental consultants would be available for beneficial re-use, say for roadwork. Should there be a need for clean soil in the local area it would be available.
1.15	Is it possible that the Dow site could be cleaned up using proven heat treatment technology. (pg 7)	Yes, Innova's thermal desorption process is proven to be safe, reliable and effective in treating contaminated soils such as those on the DOW site and a number of other contaminated sites in the Hobson's Bay area.
1.16	When the thermal treatment plant is closed down for maintenance, breakdowns etc, will emissions of toxic odours from stored and untreated soils be emitted to the Hobsons Bay Environment (pg 7)	No, Innova's technology has wide ranging process instrumentation, controls, interlocks and failsafes to ensure safe shutdown in all scenarios so that at all times there is no risk to the community or environment. All stored contaminated soil will be stored within an enclosed building fitted with an appropriate extraction system preventing the escape dust and odour.
1.17	Why should Hobsons Bay residents be expected to be subjected to added emissions which may have an accumulative effect on the local communities health, from contaminated, toxic materials brought into Hobsons Bay (pg 7)	The cumulative impacts to air quality of the proposed centre for site Remediation have been assessed in the context of the cumulative impacts accounting for surrounding industry. There will be no impact on air quality as a result of Innova's proposal.
1.18	The consultant advised that an added problem occurs when material is accepted that cannot be cleaned using the process, (a problem common	One of the advantages of Innova's process it that it is not hit and miss like some other treatment methods used in the past. Innova has demonstrated the successful

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	<p>in the treatment industry), where stockpiles sit in treatment yards for years due to technical/contractual issues. (pg 8)</p>	<p>treatment of a range of contaminated soils. Innova has a comprehensive understanding of the capabilities of thermal treatment processes and coupled with laboratory scale testing to confirm that treatment will be successful. Innova has never taken on a project which it has not successfully treated and will not accept any contaminated soils which can not be remediated using Innova's DFTD process. (for example soils containing heavy metals).</p> <p>Innova agrees that prior to any contaminated soil treatment Innova must prove both to the EPA and community that it is capable of safely and effectively treating the contaminated soil without risk to the community or environment. Innova has proposed that before any contaminated soil is treated which has a composition different to that already demonstrated by Innova, a proof of performance test be conducted to demonstrate that the soil can be remediated safely and without risk to the environment. Such pop testing must be monitored under the watchful eye of qualified independent experts and EPA scientists that may form part of a Community Reference Group (CRG).</p>
1.19	<p>The DOW site is too small to handle the quantities of contaminated soil expected and that IST will have massive stockpiles that will impact on the Hobsons Bay environment (Pg 8)</p>	<p>Innova will not have massive stockpiles of material. All stored contaminated soil will be stored within an enclosed building fitted with an appropriate extraction system preventing the escape dust and odour. The CSR operations are as such that no new soil can be accepted beyond the capacity of the storage building. Soil that has been cleaned will be beneficially re-used generally back to the original locations or to other locations that may require clean fill, soil is progress</p>
1.20	<p>IST will not be able to handle the expected large volume of treated soil within the building (pg 8)</p>	<p>Innova do not proposed to store treated soil within the building. It will be stored within designated bays with extensive control measures to control dust.</p> <p>Innova will only store and handle contaminated soil within the proposed storage building. Innova's proposed storage of soil is detailed in the works approval application.</p> <p>If Innova were to store soil in any other way we would be in breach of our approval conditions</p>
1.21	<p>IST will not be able handle storage and plant and FE loaders within the confines of the building (Pg 8)</p>	<p>Innova has modelled and assessed the storage and handling of contaminated soil within the storage building and will be able to safely operate within the building. Under no circumstances will any contaminated soil be stored outside the confines of the building.</p>
1.22	<p>It is proposed that toxic materials transported to the Altona site be in</p>	<p>The trucks licensed by EPA to transport contaminated soil are currently successfully</p>

	Comment / Concern	Innova's Response
	sealed EPA licensed trucks. These EPA licence trucks are required to be tarped but are not sealed to prevent the escape of gaseous emissions. The trucks also have sealed tail gates (Most don't work!!) to prevent liquid leakage (Pg 8)	used both in Victoria and interstate. There is no evidence that the use of these trucks presents any risk to the environment or community. There are two designs for truck covers - a "roll-back" tarp and a "side-roll" cover; Innova favours the latter design as it does provide a seal. <u>The Innova CSR does not accept liquids.</u>
1.23	From the results of testing so far it appears that the treatment efficiency of the toxic hazardous waste is dependent on the throughput rate. Therefore Innova will be looking to ensure throughput will be at maximum rate and hence soil output will be controlled at the constraints set by EPA. Pg 10	Throughput through the process is dependant on many factors such as the soil type. All soil remediated by Innova is independently tested by an environmental consultant to ensure that the contaminant has been removed from the soil during the treatment process and that the soil can be classified as clean.

Thursday, 5 March, 2009

SOIL CLEAN UP TECHNOLOGY BREAKS NEW GROUND

A contaminated site in the Melbourne suburb of Springvale has been successfully cleaned up using ground-breaking technology, potentially changing the way contaminated soil is treated in the future.

Environment and Climate Change Minister Gavin Jennings said a process called ‘thermal desorption’ was used to treat the soil on the Springvale site providing a new option for landowners and avoiding sending contaminated soil to landfill.

“We are confident we now have a viable, safe and cost-effective method for treating polluted soil based on soil sample results provided to EPA Victoria,” Mr Jennings said.

“This is the first time the technology has been used in Australia to treat soil contaminated with PCBs (Polychlorinated biphenyls).

“Independent monitoring conducted throughout the three month operation and testing of on-site soil at the completion of the process showed the technology was effective in treating PCBs with no reports of any disruption to neighbours.”

The on-site treatment involves heating the contaminated soil in a two-step process until the contaminants are neutralised. The by-products are clean soil, carbon dioxide and water. The treated soil can then be safely reused as clean fill.

“The technology meets the stringent environmental and safety standards applied by EPA Victoria with oversight provided by an independent environmental auditor,” Mr Jennings said.

“It is great to see innovative and cost-effective solutions being delivered by Australian industry.

“Industry is making great progress in reducing waste by increasing recycling and reuse and ultimately putting less hazardous waste into landfills.”

The contaminated soil at the Springvale site was cleaned by Australian company Innova Soil Technology, using its Direct Heated, Fast Quenched, Thermal Desorption (DFTD) process.

Innova managing director Dr John Lucas said Innova has shown that the DFTD system is efficient and reliable in terms of performance, safety, emissions monitoring and control.

“The treated material has passed all tests and is suitable for beneficial re-use, and the only by-products are carbon dioxide and water,” Dr Lucas said.

“The technology opens up previously unusable land and provides a cost advantage to business by treating the contaminated soil at half the price of taking it to landfill,” he said.

Media contact: Nick Talbot 03 9651 5799/0408 473 278 www.premier.vic.gov.au

Submission 2

	Comment	Response
2.1	Concern 1.	Innova is unable to comment on the operation or ownership of any other industrial sites including Dow's polystyrene/latex operations.
2.2	Concern 2: detail as follows:	
2.2a	<u>Carbon Dioxide</u> - Due to the health risks associated with carbon dioxide exposure, the US Occupational safety and health administration says that the average exposure for health adults during an 8 hour working day should not exceed 5000ppm (0.5%). The maximum safe level for infants, children, the elderly and individuals with cardio-pulmonary health issues is considerable less. For short term (under ten minutes) exposure, the US National Institute for Occupational Safe and Health (NOISH) and American Conference of Government industrial hygienists (ACGIH) limit is 30,000ppm(3%). NIOSH also states that carbon dioxide concentrations exceeding 4% are immediately harmful to life and health.	<p>Carbon dioxide is a gas naturally present in the atmosphere and also produced from a vast range of human activities including Innova's propose process and many other industrial processes without risk to human health.</p> <p>It is not at all possible for persons to be exposed to harmful levels of carbon dioxide as a result of Innova's operations.</p>
2.2b	<u>Any other contaminant</u> - A small quantity (500 Tonnes!) would be experimented on to demonstrate the suitability and adequately controlling suitability. We are to become laboratory subjects whilst they test their methods. Several trials of 500 tonnes of the same soil or some other batch can satisfy their needs to know while our health is put at risk.	<p>Innova does not intend to remediate any contaminated soil which can not be treated safely. It would not make sense do so commercially.</p> <p>The purpose of a proof of performance test is not to experiment but to demonstrate to the community and EPA that contaminated soil can be treated efficiently. To put the soil quantity in context – its about 2 to 3 days operations. A quantity of 500T of soil ensures there is sufficient operating time, approximately 2-3 days, for independent testing to be done in a compliant fashion.</p>
2.2c	<u>There are sealed Roads to control dust and runoff</u> - See page 25 of the 139 page main report. Contaminated soils in heavy trucks driving around our roads but not to worry as the roads are sealed and that will take care of incidents. Charming! Try driving on our roads when trucks are on our roads and see how much pollution and spills they cause on our roads especially with strong north winds.	<p>The trucks licensed by EPA to transport contaminated soil are currently successfully used both in Victoria and interstate. There is no evidence that the use of these trucks presents any risk to the environment or community. The trucks will not pass through residential areas – main arterial roads will be used.</p> <p>In the event of a spill of contaminated soil Innova has an Emergency Management Plant to manage and collect any contaminated soil.</p> <p>Note. the comment referred to on page 25 refers to the design inside the site itself, with sealed roads limiting the generation of dust and allowing collection and control runoff on the site during rainfall.</p>

Submission 3

	Comment	Response
3.1	It is in the interest of the resource recovery industry for contaminated soil processing and treatment facilities in Australia to operated to the highest standards, as effectively as possible. This will increase public confidence in soil treatment and encourage a shift in thinking of contaminated soil as a “waste” to a valuable resource capable of reuse.	Innova agrees entirely
3.2	Does the proposed Innova facility constitute best practice and does it reduce air emissions in relation to class 3 indicators to the maximum extent achievable.	Innova’s Process is detailed in the works approval application and will be assessed by EPA against the State Environmental Protection Policy (Air quality management) (SEPP(AQM)) Innova welcomes this assessment and expects that EPA will conduct a complete assessment to provide the community with confidence that Innova satisfies or exceeds all regulatory requirements.
3.3	DFTD is technology modified for waste treatment, rather than being designed for resource recovery	Innova’s DFTD process is specifically designed for the remediation of hydrocarbon contaminated soil; to produce a product soil for beneficial reuse.
3.4	DFTD subjects wastes to direct contact with a flame or combustion gasses. This creates a waste oxidising environment and creates the potential for precursors to dioxin formation	Any thermal process has the potential to form dioxin precursors (including The Renex proposal); Innova has in place superior controls which ensure that emissions are reduced to the maximum extent achievable. The rapid cooling step, something all regulators require is in fact part of Innova’s patent.
3.5	DFTD involves high heat transfer	Yes, it is the high and <i>efficient</i> transfer of heat which ensures effective and reliable treatment of hydrocarbon contaminated soil.
3.6	DFTD results in low thermal efficiency due to heat losses. Waste heat recovery in DFTD requires larger and more complex heat recovery plant, dealing with contaminated waste and combustion gasses.	Innova has maximised the recovery of heat whilst ensuring that the control of pollution is not compromised. The recovery of heat within the DFTD process does not require complex or large plant, but rather 2 compact heat exchangers. Innova has patented this. Renex’s process has much more complex heat recovery process.
3.7	The Innova facility appears to have a basic or minimal off gas treatment system compared to the Renex’s facility, which has a more comprehensive and robust system including an additional venturi scrubber, adsorber and off gas preheat	Renex’s process is different to Innova’s, Renex proposes to treat concentrated waste oils and tyres in addition to hydrocarbon contaminated soils. Innova will NOT accept any waste oils or liquids what so ever. Renex also proposes to treat mercury – Innova . In order to treat these wastes Renex must use a more complex emission control system. Innova proposes only to treat hydrocarbon contaminated soil and has demonstrated that the proposed off gas treatment system is effective in preventing emissions. Innova has developed its process here in Australia. Renex’s proponents are proposing to import a process and have had nil operational experience.
3.8	The waste calorific of the DFTD will be low, leading to difficulties in	Innova has demonstrated effective and reliable control of all process parameters during

	Comment	Response
	controlling temperatures especially due to the proposed direct contact with flame	all previous operations.
3.9	The DFTD plant is restricted by the moisture content of input materials. A 5% increase in moisture content will reduce plant capacity by approximately 20%. By contrast a separate feed preheat is less susceptible to plant capacity loss.	Yes, Innova's plant along with all thermal treatment technologies will experience some loss in capacity (throughput) with increases in moisture content. This is taken into account through sound process modelling that Innova possesses in-house.
3.10	Stack emissions from the Innova facility will have a visible plume	Yes, the Innova process will have a visible plume. A visible plume has no bearing on any harmful emissions – the visible part is steam.
3.11	The levels at which the soil treatment temperature and oxidiser operating temperature work to minimise residues in soil and off gas may result in a high level of gas consumption and accordingly in greenhouse gas emissions.	<p>Innova's operating conditions are based on sound science and engineering which have been proven to successfully remediate contaminated soil while ensuring there are no harmful emissions.</p> <p>Soil Treatment Temperature Soil treatment temperature is determined for a particular contaminant by conducting laboratory scale treatability studies to determine the treatment temperature required to remove contaminant from the soil matrix and ensure no harmful by-products are formed. It is irrelevant whether a thermal treatment technology uses a direct (like Innova's) or indirect (like Renex's) heating process, the same soil temperature is required to remove (desorb) the hydrocarbons from the soil matrix. (In any case indirect heating is <i>always</i> less efficient).</p> <p>Conversion Chamber Operating Temperature. Innova uses operating temperatures in its conversion chambers which are based on sound and internationally accepted science and more importantly the conditions have proven to be more than adequate in the conversion of hydrocarbons. Innova has demonstrated these conditions are effective. Operating temperature and residence time need to be considered in unison. Innova's converter residence time is greater than 3 seconds – far exceeding the 1.5 to 2 seconds thought to be suitable. Innova's process operates at World's Best Practice levels, and, arguably Innova's process development from a sound scientific basis and engineering practice has contributed to the best practice!</p> <p>Gas consumption Innova's DFTD process has been designed to minimise the use of resources including natural gas without compromising the environmental performance of the process.</p>

	Comment	Response
		<p>Innova does not intend to supplement its process by using concentrated wastes including waste oils and old tyres (as per the Renex proposal)</p>
3.12	<p>Extensive proof of performance testing still required.</p>	<p>It is in the interest of the resource recovery industry for contaminated soil processing and treatment facilities in Australia to operated to the highest standards, as effectively as possible. This will increase public confidence in soil treatment and encourage a shift in thinking of contaminated soil as a “waste” to a valuable resource capable of reuse.</p> <p>To demonstrate to the community and EPA that Innova’s Centre for Site remediation are operated to the highest standards Innova is proposing an extensive program of Proof of Performance testing. This Proof of performance testing will give EPA and the community confidence that we are in fact doing what we say. <u>Innova wholly supports and is pushing for the notion of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u> Innova would encourage any other proponents of to demonstrate their commitment to operating to the highest standards by conducting extensive proof of performance testing under the scrutiny of their community.</p> <p>Innova has proven that the DFTD process is effective at treating a wide range of hydrocarbon contaminated soils without any impact on the community or environment. It will continue to demonstrate this in a transparent and open way</p>
3.13	<p>Depending on waste types accepted, there are potential upper and lower explosive limit safety issues given the oxidising environment of the DFTD</p>	<p>Prior to conducting any contaminated soil treatment Innova conducts extensive laboratory testing and assessment prior to treating any contaminated material. This includes evaluation of any safety risks in the treatment of the contaminated soil. Innova’s process also includes monitoring of conditions within the process to ensure safe conditions are maintained throughout the operations. Innova’s advanced in-house process modelling is also employed to ensure safe operating conditions</p> <p>It should be noted that the real problem of explosive limits come about for <u>indirect</u> thermal process (Renex) which are subject to potential lower and upper explosive limit issues, particularly if there is any air leaks into the process or where concentrated contaminated streams are introduced into oxygen rich chambers. All responsible operators of treatment process must be aware of all safety issues, further; all responsible operators should thoroughly <i>understand</i> their process.</p>

	Comment	Response
3.14	<p>According to page 48 of the GHD report, POP Testing of 400 Tonnes of waste is proposed. This is expected to take only about 24hrs and includes start up and shut down time. It is unclear whether POP testing of this scope will be sufficient. POP testing generally requires 2000-5000 Tonnes to ensure a steady state of operations in obtaining representative sampling and testing. Theoretical extrapolation of POP testing can be high risk.</p>	<p>The POP testing process proposed by Innova is expected to take 48 hrs, sufficient time for accurate emissions testing by independent NAA accredited emissions testing consultants in line with EPA requirements. While other process may require 2000-5000T of soil to ensure a steady state operation (presumably operating for many days), Innova is has demonstrated that steady state operations are reached almost immediately with no period of unsteady operations where environmental performance may be compromised.</p> <p>There is no theoretical extrapolation of POP test results – the data and the results are irrefutable.</p> <p>Innova has not proposed to treat larger than necessary quantities of contaminated soil to demonstrate to the community and EPA the DFTD process is effective and safe. (2000 to tonnes could represent an entire project)</p>
3.15	<p>Page 10 of the GHD report states that the Innova Facility may treat contaminated soils from the Dow Chemical Site. The Dow chemicals site is known to be extensively contaminated with mercury. The proposed Innova facility can not treat soils with extensive mercury contamination so no amount of POP testing will be able to produce an outcome whereby these soils can be treated.</p>	<p>Yes it is correct, Innova is unable to treat soils contaminated with mercury. Innova does not propose to treat any soil which is contaminated with mercury.</p> <p>Please refer to Dow chemicals submission for specific comment on contamination of The Dow Chemicals Site.</p>
3.16	<p>Pre-existing contamination of Dow Chemical site and future Issues</p>	<p>Please refer to Dow chemicals submission for specific comment on contamination of The Dow Chemicals Site.</p>
3.17	<p>How will an appropriate financial assurance be determined to cover the event where Innova is required to clean up all soil and groundwater pollution that may be linked to its Centre for Soil remediation.</p>	<p>The Centre for site remediation will be required by EPA to put forward a financial assurance. The value of the financial assurance will be calculated according to EPA's requirements detailed in EPA Publication 456.1 Guidelines for Determining Financial Assurances for Schedule 4 premises.</p> <p>This is the same method used to determine the financial assurance which will be required for other proposals</p>
3.18	<p>Enclosure of Innova facility and storage of soils</p>	<p>Innova proposes to store all contaminated soil with an enclosed building in order to ensure there are no contaminated dust or odours are generated from the storage and handling of contaminated soil.</p> <p>The location of the processing plant outside does not lead to any emissions and will not lead to any OH&S issues for on site or offsite workers or residents.</p>

	Comment	Response
		Innova does propose to store clean soil outside the confines of the building as this soil does not contain any contaminants and does not present Innova has proposed methodologies to control any dust including covering all soil and storing soil in designated bays.
3.19	Noise impacts	During Innova's previous operations Independent noise monitoring has been conducted and noise levels at the boundary of the proposed site will not be impacted. No complaints have been received for any of Innova's operations.

Submission 4

	Comment	Response
4.1	I object to the proposal of this facility being located in Altona. Altona is a flourishing neighbourhood these days and companies need to change their thinking about our suburb.	Innova hopes that by establishing the Centre for Site Remediation within the Altona Petrochemical complex it will give companies a local solution to contaminated land problems. There are more sites from the Hobsons Bay local council area listed on the Victorian EPA's priority sites register of contaminated sites than in any other local council area in Victoria. <u>By providing land owners of all types with an opportunity to remediate their sites Innova hopes to contribute positively to the clean-up of our environment.</u>

Submission 5

	Comment	Response
5.1	It is of great concern for me to hear about the proposed soil decontamination plant and believe that it should not be located so close to peoples homes. I strongly believe that it should be located somewhere more isolated (like Hifert on Geelong Rd)	Innova proposes to establish a Centre for Site Remediation in order to provide a remediation alternative to land fill for the remediation of hydrocarbon contaminated soil on sites where on site remediation is not possible. Innova believes the Dow site is the ideal location for the Centre for Site Remediation as it is close proximity to a large number of contaminated sites and is within a heavy industrial area with the infrastructure required including extensive road networks allowing soil to be transported without impacting on the local community.
5.2	The transportation of the contaminated soil is of great concern to me due to it being by road with covers. Anyone who has driven behind a quarry truck with covers would have to be concerned about this form of transportation	The trucks licensed by EPA to transport contaminated soil are currently successfully used both in Victoria and interstate. There is no evidence that the use of these trucks presents any risk to the environment or community. There are two designs for truck covers - a "roll-back" tarp and a "side-roll" cover; Innova favours the latter design as it does provide a seal.
5.3	I'm also greatly concerned that trials are will be conducted on any new substances that may arise (as mentioned in the submission). I feel there are many opportunities for resident's safety to be compromised if this application is approved	Innova does not intend to remediate any contaminated soil which can not be treated safely. It would not make sense do so commercially. The purpose of a proof of performance test is not to experiment but to demonstrate to the community and EPA that contaminated soil can be treated efficiently in a totally open and transparent way. A quantity of 500T ensures there is sufficient operating time approximately 2-3 days for independent testing to occur.
5.4	It is also of concern that this company only consulted with its backers/partners and not with the people who live in this area and want to stay here without fear of risking their health and safety.	Innova has consulted very broadly in the community and with as many people as possible. Please refer to the earlier section in this response document summarising our extensive consultation efforts over the past (almost) two years.

Submission 6

	Comment	Response
6.1	We would like to object in the strongest possible terms to the proposal put forward for a decontamination facility to be constructed so close to a high density living community.	Innova proposes to establish a Centre for Site Remediation in order to provide a remediation alternative to land fill for the remediation of hydrocarbon contaminated soil on sites where on-site remediation is not possible. Innova believes the Dow site is the ideal location for the Centre for Site Remediation as it is close proximity to a large number of contaminated sites and is within a heavy industrial area with the infrastructure required including direct links to major road networks allowing soil to be transported without impacting on the local community. No trucks will be permitted in residential areas
6.2	Hobsons Bay has been inundated with major polluting industries and therefore residents feel that another site of this magnitude is most undesirable	Innova hopes that by establishing the Centre for Site Remediation within the Altona Petrochemical complex it will give companies a local solution to contaminated land problems. There are more sites from the Hobsons Bay local council area listed on the Victorian EPA's priority sites register of contaminated sites than in any other local council area in Victoria. <u>By providing land owners of all types with an opportunity to remediate their sites Innova hopes to contribute positively to the clean-up of our environment.</u>
6.3	Altona residents does not want anymore contaminants in our overburdened environment	Innova hopes to be able to assist local Altona companies deal with their existing contaminated land legacy issues.

Submission 7

	Comment	Response
7.1	The Toward Zero Waste (TZW) strategy does not deal with Prescribed industrial waste and is therefore not relevant to the proposal. The environmental Protection (Industrial Waste Resource) Regulations 2009 are more relevant. The reference to TZW should be removed.	While the TWZ strategy does not deal with prescribed industrial waste the principles of resource reuse and recycling to prevent the dumping of solid waste disposed of to landfills is certainly in line with Innova's objective of diverting contaminated soils from landfill by remediating the soil for beneficial reuse.
7.2	Innova is seeking approval to operate the plant at up to 100,000 Tonne per annum. Based on historical disposal rates of contaminated soil (Figures 1 and 2 of the application) described in the application, this equates to one third to one quarter of the Victorian market. The limitations placed by Innova on the incoming contaminant levels may further reduce the volume of suitable soil significantly. This places some doubt on the actual maximum volume of soil likely to be treated.	The maximum capacity of Innova's DFTD process and the CSR is 100,000T per annum – the amount that can be processed in a year. The CSR's actual throughput correctly pointed out will be determined by market demand; Innova does not anticipate that market demand will result in Innova's operations reaching capacity during the first three to four years of operation.
7.3	The application refers to a number of projects where Innova has used Direct heated Fast quenched Thermal Desorption process to remediate contaminated soils. It is not clear from the application what changes have been made to the technology since any of these projects were completed. The changes made to the DFTD process over the course of various projects should be clarified.	Innova throughout it's history have made a number of modifications in the development of the DFTD process to ensure best practice environmental performance is maintained and to improve the operation of the plant. Major plant upgrades <ul style="list-style-type: none"> • Replacement of Venturi scrubber with baghouse to ensure best practice particulate emissions is achieved. The Baghouse was added prior to be Koppers project (2006) and the plant was also used with this configuration during the Newcastle Harbour sediment remediation project (2006). • Addition of acid gas scrubber to achieve best practice control of HCl and SO2. The scrubber was added to the process prior to the Springvale project (2008). • It is proposed that the DFTD process will be operated in this same configuration at the CSR, however in addition sorbent injection prior to the baghouse will be added as an additional contingency to ensure there is no risk of emissions during any process malfunction or breakdown.
7.4	The estimated cost of works is \$5M. It is not clear how this figure was calculated and to what extent it takes into account the value of portable plant, other equipment and buildings.	The estimated cost of works has been estimation on the capital cost of the works including: <ul style="list-style-type: none"> • Upgrades to the site infrastructure • Modification of the soil storage building • Erection of Plant and equipment. It does not include the value of the mobile plant.
7.5	Variation of an order Relating to Notifiable Chemicals (the order) (No S%, Gazette, 1/02/2000) is not listed as relevant legislation. However the Order is referred to in Section 10.6 and Innova commit to developing a	It is an omission on our part that the Notifiable Chemical order for PCB's was left out of Section 2.2. (Other Relevant Legislation, Policies and Guidelines)

	Comment	Response
	Environment Improvement Plan (EIP) as required. Section 2.2 of the application should reference the order	
7.6a	The overview of the CSR Infrastructure mentions the clean soil stockpile area (capacity 15,000 Tonnes) and the clean soil stockpile area and the "clean soil" stockpile area (1ha) It is not clear if these are the same areas.	Innova accepts that the information provided relating to clean soil storage is inconsistent and confusing. Innova will prepare an addendum clarifying the configuration and layout of the clean soil storage areas.
7.6b	Figure 4 and 6 show the location of the centre for site remediation within the Dow site. It is unclear if these figures include the "Clean Soil" Stockpile area. See section 4. This should be clarified.	The layout of the clean soil stockpile areas is proposed to be as per that presented in Figure 7.
7.6c	14 bays of clean soil storage are referred to: only 9 are shown in figure 7, a different configuration of the 9 is shown in figure 8. This adds further confusion as to the location and configuration of the clean soil stockpile area.	
7.6d	Figure 7 shows clean soil storage areas (x 2) but no clean soil stockpile area.	
7.6e	Figure 8 shows a different clean soil stockpile configuration from Figure 7, there are differing numbers of clean soil storage bays.	
7.7	Section 3.3 "surrounding land uses" does not list Altona west Kindergarten. This should be included in the application	
7.8	The EPA should ensure that best practice measures are incorporated into the design and operation of the site through the inclusion of appropriate Works approval and Licence Conditions.	The Altona West kindergarten is located in Lindwood Avenue approximately 1.3kms to the south west of the site. It was an omission that it was not included in section 3.3 along with other local schools. Innova agrees that best practice measures must be incorporated into the Centre for Site Remediation and that the EPA should include Works Approval and Licence Conditions ensure that the operations continue to be maintained as best practice.
7.9	The decision making framework for acceptance of contaminated soils describes a "Proof of Performance" (POP) test procedure for contaminants above threshold values or with contaminants not previously treated. Whilst the general nature of the POP testing procedure is described, details of the quality assurance and public disclosure are not.	Innova will follow all EPA standards and methods for all POP test requirements and will use qualified independent consultants to carry out all environmental testing required during any POP test (or any other environmental monitoring). All independent consultants are required to be NATA accredited (part of which involves suitable QA/QC procedures and processes) Innova has no objection to the public release of all environmental monitoring data. <u>Indeed, Innova wholly supports and is pushing for a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u>
7.10	Additional quality assurance prior to permitting the treatment of "new" contaminated soils could be gained by having the results of the POP test subject to the assessment of an environmental auditor appointed under	Innova would most welcome the results of POP tests being assessed by an environmental auditor and indeed the involvement of the auditor throughout the POP test process.

	Comment	Response
	the Environmental protection Act.	
7.11	In section 5.3.1, Innova Commit to limiting PCB contaminated soils to less than 1% PCB, then it appears that Innova do not intend to subject soils with greater than 1% PCB to POP testing. Figure 11 should be amended making it clear that PCB's cannot be accepted or treated. The limitation proposed by Innova should be a condition of a works approval or licence.	Innova expects this condition to be included as a licence condition.
7.12	A management procedure has not been presented detailing contingency storage measures required in the event of extended equipment breakdown/failure. This is needed due to the uncertainty associated with the clean soil stockpile area referred to previously. The EPA needs to review the storage procedures and ensure that there is adequate provision of extended FTD failure or breakdown.	Innova does not propose to have an area for storage of contaminated soil in the event of an extended breakdown or failure. Innova's capacity to store contaminated soil is limited to that which can be stored within the storage building. In the event of an extended break down - once the storage capacity of the shed is reached no further receipt of soil will occur. Innova accept that this could result in interruptions to works on contaminated sites.
7.13	The process flow diagram for the building air purification systems is not provided in appendix B as stated in the works approval application	An addendum including the process flow diagram will be issued.
7.14	The Works approval application notes that the carbon filter will be checked to ensure that there is no breakthrough of Volatile Organic Compounds, although the checking procedure is not presented. The EPA should review the proposed operating regime and ensure adequate procedures for the checking and replacement of carbon in the building air filtration systems are provided for.	Innova agrees and anticipates prior to issuing a licence EPA will review all of Innova's management plans and procedures to ensure that best practice operations are in place and maintained.
7.15	Contaminated soil is transferred to the DFTD feed hopper via front end loader. Whilst this is enclosed and under negative pressure, as it will involve the movement of heavy machinery, it will need to be carefully maintained to ensure it continues to operate effectively. An EMP for the operation of the facility should be a requirement of any works approval issued by EPA. It should include procedures for the maintenance of the contaminated soils feed area. A clear diagram illustrating which buildings will be maintained enclosed and under negative pressure should be provided.	Innova agrees and anticipates prior to issuing a licence EPA will review all of Innova's management plans and procedures to ensure that best practice operations are maintained. The contaminated soil storage and handling building will be the subject of regular inspections to ensure there is no damage which may compromise the integrity of the building. Additional barricading will be installed within the building to ensure that it is protected from impacts from equipment.
7.16	Acceptance of "new" types of contaminated soils may generate community interest and the need for a licence amendment from EPA, consideration should be given to referring such applications received by EPA to public disclosure (eg. via advertising or internet)	Innova has committed to keeping the community updated through the existing Altona Complex Neighbourhood Consultative Group (ACNCG). <u>Innova wholly supports and is pushing for a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u> Innova would also support the advertising of any new soils proposed to be treated along with the results of associated environmental

	Comment	Response
		monitoring.
7.17	During Automatic Soil Feed Shut Off (ASF SO) event, partially treated, hot soil will need to be removed from the rotary dryer. This will have the potential to generate odorous emissions. We suggest that suitable measures be incorporated to minimise the likelihood of odorous emissions impacting on sensitive uses during such an event. An EMP for the operation of the facility should be a requirement of any Works Approval issued by EPA. It should include procedures for management of partially treated hot soil to ensure that the risk of fugitive emissions to air is adequately mitigated.	<p>In the event of an ASF SO event partially treated soil is removed from the plant and cooled (in the pug mill) in the same way as during normal operations. Any potentially untreated soil discharged from the plant during an ASF SO event is diverted to be returned to the contaminated storage building and retreated.</p> <p>At no time with hot soil treated or untreated be discharged from the process.</p>
7.18	The general process for clean soil validation is not depicted in Figure 11, as noted in the Works Approval Application. A management plan dealing with measures to deal with treated soil which does not achieve clean fill criteria needs to be developed. An EMP for the operation of the facility should be a requirement of any Works Approval issued by EPA. It should include procedures for management of soil which has not been successfully treated to ensure that the risk of fugitive emissions to air and surface water contamination are mitigated.	<p>Clean soil will be validated using the standard methodologies accepted by EPA. All validation of clean soil will be undertaken by independent environmental consultants.</p> <p>Any soil which does not achieve clean fill criteria will be retreated. Innova does not propose to accept any material which it is unable to remediate to clean fill criteria. eg. Soil contaminated with heavy metals.</p> <p>Innova agrees that an EMP for the operation of the facility should be a requirement of any Works Approval issued by EPA.</p> <p>For perspective, in the Springvale project less than 4 tonnes of soil (from 21,000 tonnes) required re-treatment and this was due to a process upsets in which the cooled processed soil is diverted to the "re-treat" area.</p>
7.19	Section 5.4 "Best Practice Considerations in Energy Efficiency" should include consideration of other energy uses additional to the DFTD, such as amenities, building and storage shed. An EMP for the operation of the facility be a requirement of any Works Approval issued by EPA. This management plan should include Best Practice energy management for all aspects of the proposed development.	<p>Innova will include the management of energy and other resources use within the EMP for the project. (In any case the energy uses additional to the operation of the DFTD process are minor in comparison)</p> <p>Innova agrees that an EMP for the operation of the facility should be a requirement of any Works Approval issued by EPA</p>
7.20	Table 13 appears to make no reference to risks associated with operation of the bag-house. Appendix G, "Air Quality Risk Assessment for Process Upsets" rates risk associated with the bag-house as low. We suggest that this should be scrutinised further as there appears to be no link to the ASF SO system (as exists for the rapid quench failure, scrubber recirculation pump etc). We cannot identify where the method of bag failure detection is described (no description of alarms or interlocks).	<p>The risk of any environmental or safety hazards as a result of any baghouse related issue are quite low. In the event of any baghouse breakthrough Innova has instrumentation to detect any particulate breakthrough. A detection of a potential broken bag does not instigate an Automatic Soil Feed Shut Off as it does not present an immediate threat to safety or the environment (there are literally hundreds of bags in place). This allows the operator to shut down the DFTD process using the normal plant shutdown procedures to determine the cause of the alarm.</p>

	Comment	Response
	<p>Appendix H, Innova Hazop Notes for DFTD Plant, does not include the HAZOP conducted in 2008. Previous HAZOPS did not consider the bag-house as it was not part of the proposed facility at the time. This makes it difficult to determine to what extent bag-house failure risks have been assessed. The EPA should review the assessment of risks associated with the operation of the bag-house and ensure that it is satisfied that these risks are being suitably managed.</p>	<p>Innova propose to revise the plant HAZOP entirely prior to the construction to ensure all existing controls are adequate.</p>
7.21	<p>The risk assessment identifies transport of contaminated soil as a medium level risk and states that this risk will be addressed through the implementation of an Incident Response Plan (IRP) Section 10 does not provide details of how Innova proposes to deal with spillage outside the DOW property.</p>	<p>All industries face the challenges of road safety when transporting goods. Innova is committed to ensuring all vehicles used for the transportation are safe and well maintained and that all transportation is carried out safely. All transport will follow road rules and particularly those relating to heavy vehicle driver fatigue and drugs and alcohol.</p> <p>For this proposal to establish a CSR it is difficult to estimate the risk of accident or exposure during <i>transportation</i> of soils. On the roads there is always risk of accident and an accident could result in a soil spill. However, the dangers associated with such a spill are minimal.</p> <p>Although contaminated, the soil is mainly solid, the hydrocarbon contaminant is at about a one per cent level, in general, so it's very dilute. Contaminants are "embedded" in the solid matrix and adsorbed onto the soil grains – it is no means a free flowing liquid. The contaminant is "stuck to the soil" so if we have a truck spill or accident the soil will essentially remain as a pile. Yes there defiantly needs to be a suitable and fast Environmental Response Plan (or and Incident Response Plan) to ensure that the soil is contained, covered, recovered and that there is no impact on the environment.</p> <p>The risk to the public is considerably lower that an accident involving a tanker transporting liquid chemicals or fuels. We know that this is far more difficult to manage, because of the free-flowing nature of the liquid chemical. With the good work of expert HazMat teams we are able to manage our liquid spills. The same management will be possible for any solid spills.</p> <p>As a caveat, establishment of suitable a CSR such as that proposed by Innova will allow for any soils impacted by a fuel spill in the area to be suitably dealt with. Innova would happily work with authorities, through a proposed Community Reference Group, to devise suitable Emergency Response Plans that would see provision of world class environmental protection measures.</p>

	Comment	Response
7.22	<p>Characterisation of (VOC) emissions from the building ventilation stack was conducted for naphthalene, which is a semi-volatile organic compound. Treatment of soils contaminated with Petroleum Hydrocarbons (TPH) to be treated could include more volatile odorous VOC such as toluene. The EPA should ensure that suitable worst case VOC emissions from the building ventilation stack have been considered and that the building air purification system is suitable for these emissions.</p>	<p>While it is true that there are more volatile potential contaminants which could be present in contaminated soil they are typically present in much lower concentrations as by virtue of their volatility these contaminants are less persistent in the environment.</p> <p>In Innova's experience the most odorous and offensive contaminants found in soils are those contain PAH's (Poly Aromatic Hydrocarbons) such as naphthalene.</p>
7.23	<p>The application does not include an assessment of the emissions against Schedule E (in stack emission concentrations) of SEPP AQM. The EPA should satisfy itself that the emissions comply with Schedule E of SEPP AQM</p>	<p>Innova agrees that EPA should satisfy itself that all regulatory requirements are met including those within the SEPP AQM</p>
7.24	<p>The Works Approval Application lacks clarity in characterising proposed emissions. There are inconsistencies between the mass and energy model inputs between Page 69 (29850 mg/kg TPH and 150 mg/kg PCB) and Table 19 (27,000 mg/kg Coal Tar (PAH), 150 mg/kg PCB) and Appendix E (Coal Tar (PAH) 29,700 mg/kg and 300 mg/kg PCB).</p> <p>It is noted that the maximum measured contaminant concentrations exceed proposed emission rates for a number of contaminants. In particular measured emission concentrations of Cadmium, Chromium and Mercury in Table 21 are higher than the emission concentrations used in dispersion modelling. No explanation is given</p>	<p>Innova acknowledges the inconsistencies and typographical errors associated with the mass and energy model inputs.</p> <p>The Model inputs are in fact <u>Coal Tar (PAH) 29,700 mg/kg and 300 mg/kg PCB</u>. Innova submitted Supplementary Information 1 dated 5 January 2011 confirming this.</p> <p>The higher measured emission concentrations of Cadmium, Chromium and Mercury shown in Table 21 are values obtained for an earlier configuration of the plant rather than current configuration.</p> <p>Innova will submit supplementary information to clarify the approach.</p>
7.25	<p>The modelling assessment should include hydrogen fluoride for 7 day and 90 day averaging periods as specified in SEPP (AQM). The EPA should ensure that compliance with all three averaging periods stipulated in SEPP (AQM) for hydrogen fluoride emissions will be achieved.</p>	<p>Innova acknowledges that the predicted impact for hydrogen fluoride at averaging periods of 7 days and 90 days were not included in our summary of results. Innova will issue an addendum with the revised calculations.</p>
7.26	<p>9.1.4 Identifies the nearest sensitive receptor at Morrow Street Altona approx. 950m SSE Section 9.1.6 makes predictions for Charles Road Altona. It is not clear if both are sensitive receptor located at 950m from the site. This needs to be clarified.</p>	<p>This is a typo, the nearest residence is approximately 950m away, at Morrow St.</p>
7.27	<p>Table 35 provides predicted noise levels at various distances from the site. There is no information regarding individual equipment sound power levels supplied to base these predictions on. The EPA should ensure that appropriate sound power levels, used in these predictions,</p>	<p>Innova will provide an addendum clarifying the sound power levels used in the modelling. It should be noted that modelling based on the actual measured noise levels during operations (shown in table 36) result in lower sound levels than those predicted using sound power levels of plant and equipment.</p>

	Comment	Response
	are accurate.	
7.28	The application commits Innova to the development of an Environmental Management Plan (EMP) The completion of the EMP should be a condition	Innova agrees that an EMP for the operation of the facility should be a requirement of any Works Approval issued by EPA. Such an EMP should be subject to regular review by both EPA and the community
7.29	The application does not state what the proposed emission limits for the facility will be.....the EPA should indicate what the emission limits will be.	Innova agrees that the EPA should indicate what the emission limits will be
7.30	The transportation of contaminated material to the CRS is an integral part of the operation of the site..... In order to minimise unnecessary risk to the environment, through transportation of contaminated materials, a limited radius should be imposed for the collection of material....	Innova does not believe it is appropriate to restrict transportation of contaminated soil to the Centre for Site Remediation when similar restrictions are not imposed upon other remediation alternatives including landfill. The transportation of hydrocarbon contaminated soil presents little risk to the environment. (refer to response at 7:21)
7.31	The proposed operation needs to "dove tail" with the existing DOW operation to be considered to be a success from both an environmental and town planning perspective. No details on how the Innova operation will interact with the DOW operation have been provided.	<p>Innova and Dow will share some infrastructure (for example some roadways, weighbridge, electrical, gas and water services) and Innova will lease the proposed site from Dow, however Innova and Dow will maintain separate operations.</p> <p>Innova sees the opportunity to be located within the petrochemical complex as an opportunity to provide an alternative to landfill for not only Dow but industry throughout Hobsons bay and the greater western suburbs of Melbourne.</p>

Submission 8

	Comment	Response
8.1	We have 2 small children and we don't want them exposed to toxic air emissions like benzene. We probably live just beyond the 950m buffer zone.	The operation of Innova's Centre for Site remediation will have no impact on the health safety and amenity of Hobsons Bay Residents. Innova has demonstrated during it's previous operations that there will be no impact on local residents and is committed to a program of performance testing to further demonstrate that there is no risk to local residents or the environment. <u>Innova is advocating for the establishment of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u>
8.2	We do not want constant noise pollution 24 hours a day and think this is unacceptable	The operation of Innova's Centre for Site remediation can not be heard at all by nearby residents.
8.3	The prevailing winds in Altona are often north westerly which means we already cop an array of unusual and unpleasant odours, often asking ourselves what are we breathing in. We also experience periods of loud noise such as flaring	The winds will have no bearing on Innova's operations as contaminated soil is stored in a building fitted with appropriate extraction systems. Clean soil will be stored in covered bays pending dispatch.
8.4	The EPA provided none of the "supporting documentation" in the works approval, it seems that much of the detail has been hidden away in this documentation	All documentation is available on the EPA website and nothing has been hidden: http://www.epa.vic.gov.au/compliance-enforcement/comments/Innova.asp Innova has chosen not to make any documentation confidential to ensure transparency.
8.5	The "shinning light" project that the works approval application points to is he Innova Springvale project which was an example of the technology being taken to a contaminated site and cleaning toxic soil on site. John Lucas (Innova CEO) himself has been quoted as saying that this is what the technology is designed for. By treating toxic soil on site it negates the need to transport such toxic soil by road to Altona. Treat the toxic soil where it is like in Springvale, by all accounts it was a resounding success.	Yes Springvale was a resounding success and only hard work, dedication, belief and absolute diligence made this so. Not every former industrial site is like Springvale. Some sites are either too small, don't have adequate services or there other impediments to setting up an on-site remediation process. In fact most sites are like this – so what happens to them? They decay or stay dormant as a blight on our urban environs; or the problem is shifted to Landfill and we know what problems this has caused. We are proud of the achievements at Springvale and it is precisely because of this success we believe Innova can make a positive difference to the environment – that's why we are proposing the CSR – to fix problems, not create them.
8.6	Living in Altona we already have to contend with large polluters such as Mobil, Qenos and the Brooklyn Estate (just to name a few). The EPA should sort out the existing risks that residents face before allowing more heavy industry to set up shop.	Innova hopes that by establishing the Centre for Site Remediation within the Altona Petrochemical complex it will give companies a local solution to contaminated land problems. There are more sites from the Hobsons Bay local council area listed on the Victorian EPA's priority sites register of contaminated sits than in any other local council area in Victoria. <u>By providing land owners of all types with an opportunity to remediate their sites Innova hopes to contribute positively to the clean-up of our environment.</u>
8.7	There are many more large warehouses around Altona now (eg. toll) with staff and drivers coming in and out. Their occupational health and safety must be considered if they are ti be exposed on a daily	The operation of Innova's Centre for Site remediation will have no impact on the health safety and amenity of employees working on the site or in surrounding industries. Innova has demonstrated during it's previous operations that there will be no impact on employees

	Comment	Response
	basis well within the 950m buffer zone	or surrounding industry and is committed to a program of performance testing to further demonstrated that there is no risk to any member of the community.
8.8	The residents of the western suburbs have had a gut full of and nose full of polluting industries treating local residents as insignificant. We and many of our friends and neighbours are prepared to do whatever we have to do to be heard and to hold to account agencies such as the EPA, all levels of government and polluting industries.	<u>Innova is advocating for the establishment of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u>
8.9	The western suburbs have become much more densely populated over recent years which has also meant more traffic on the roads and in 2010 there were more accidents involving trucks than ever before. Increased risk of accident and exposure to toxic material to a greater number of people.	<p>All industries face the challenges of road safety when transporting goods. Innova is committed to ensuring all vehicles used for the transportation are safe and well maintained. All transport will follow road rules and particularly those relating to heavy vehicle driver fatigue and drugs and alcohol.</p> <p>Quantifying the risk of an accident and a soil spill is very difficult. There is certainly a risk of accident; we all face the same risk every time we go on the road.</p> <p>The risk of harm associated with a soil spill is very low. Clean soil poses no risk of harm above the risk associated with any collision involving a large vehicle. Contaminated soil is easily contained – much easier than any liquid. The contaminant level is low and its “embedded” in the solid matrix and is adsorbed onto the soil grains – it is no means a free flowing liquid. The contaminant is “stuck to the soil” so if we have a truck spill or accident the soil will essentially remain as a pile. Of course there needs to be a suitable and fast Environmental Response Plan to ensure that the soil is contained, covered, recovered and that there is no impact on the environment. We commit to having such a plan in place.</p>

Submission 9

	Comment	Response
9.1	The Altona, Altona North, Brooklyn and Laverton districts have long been used as the sites for some of the worst type of chemical and polluting manufacture.	Innova hopes that by establishing the Centre for Site Remediation within the Altona Petrochemical complex it will give companies a local solution to contaminated land problems. There are more sites from the Hobsons Bay local council area listed on the Victorian EPA's priority sites register of contaminated sites than in any other local council area in Victoria. <u>By providing land owners of all types with an opportunity to remediate their sites Innova hopes to contribute positively to the clean-up of our environment.</u>
9.2	Our district is known for having the worst incidence of childhood asthma in the state, believed associated with the Mobil Refinery and Carbon Black. This type of side effect to chemical treatment plants must be halted.	The operation of Innova's Centre for Site remediation will have no impact on the health safety and amenity of Hobsons Bay Residents. Innova has demonstrated during its previous operations that there will be no impact on local residents and is committed to a program of performance testing to further demonstrate that there is no risk to local residents or the environment. Innova hopes to play a positive role in the clean-up of the environment
9.3	Innova's claim of an "encouraging and delighted public approval" is highly suspect and certainly in need of further examination.	Innova has consulted very broadly in the community and with as many people as possible. Please refer to the earlier section in this response document summarising our extensive consultation efforts over the past (almost) two years.
9.4	Innova will assess what will be treated and what will be rejected.... Gee I feel safe now.	All industries are required to assess what feedstock's are suitable. Innova has in place a process to determine what materials are safe to treat and to demonstrate to the EPA and the community that these soils can be safely treated. <u>Innova is advocating for the establishment of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u>
9.5	Will soil carrying trucks be banned from travelling along Millers road for access to the plant via populated areas, schools and shopping centres?	There is need at all to transport soil from outside the local area along Millers road. Innova would have no objection to such a condition preventing soil from outside the local area being transported on any part of Millers rd. or any other local road. It should be noted though that there is in fact at least one contaminated site located on Millers. Rd.
9.6	Can the treatment plant guarantee the facility will be sealed adequately, so as to prevent even the most minor breakdown or error in containment? "remember the space shuttle 'o' ring"	The operation of Innova's Centre for Site remediation will have no impact on the health safety and amenity of Hobsons Bay Residents. Innova has demonstrated during its previous operations that there will be no impact on local residents and is committed to a program of performance testing to further demonstrate that there is no risk to local residents or the environment. Innova has in place a extensive range of redundant systems to ensure that in the event of any abnormal condition or equipment failure there is no risk to the environment or any member of the community. Based on experience to date Innova can guarantee that the CSR will be indeed sealed adequately.

Submission 10

	Comment	Response
10.1	As such we are not prepared to be the “dumping ground” of toxins as we were in the past. These old practices brought about the unwanted and unhealthy results of the highest incidence of childhood asthma in Victoria. We are not prepared to	Innova hopes that by establishing the Centre for Site Remediation within the Altona Petrochemical complex it will give companies a local solution to contaminated land problems. There are more sites from the Hobsons Bay local council area listed on the Victorian EPA’s priority sites register of contaminated sites than in any other local council area in Victoria. <u>By providing land owners of all types with an opportunity to remediate their sites Innova hopes to contribute positively to the clean-up of our environment</u>
10.2	Studies by numerous chemical engineer professionals have shown that with the exception of one project in Springvale treating PCB, the most Innova Soil Technology has accomplished to date are small pilot projects, trials and research. Such results do not inspire confidence in the process plants capabilities	Innova has provided the EPA and included within the works approval application data from previous projects, ones that form part of our impressive and world class track record. Innova is not a huge multi-national corporation but we have built up our Australian Technology and expertise from the ground up with hard work, dedication, belief and absolute diligence. Innova has had to pass the due diligence checks of many a large corporation to be able to deliver contractually – and we have in all cases. On budget and on-time. The accomplishments of Innova in Environmental Repair have been substantive and Innova is highly thankful to organisations and land owners that have entrusted us to deliver sound environmental outcomes for them. These organisations include BHPBilliton, AGL, Koppers and Harvey Norman. In addition to our previous works, Innova is advocating proof of performance (POP) to demonstrate to both to the EPA and community that it is capable of safely and effectively treating the contaminated soil without risk to the community or environment. <u>Innova is advocating for the establishment of a Community Reference Group (CRG) to scrutinise not only the POP trial(s) but all aspects of the CSR operation.</u>
10.3	In this contexts it must be remembered that the Dow site would be taking on the responsibility of processing all of Victoria’s toxic waste and soil	Innova does not propose to accept anything other than hydrocarbon contaminated soil. For Innova’s Centre, it is anticipated that soils will come from Melbourne’s Western Suburbs, particularly when a similar Centre has been approved in the eastern suburbs in Dandenong. It is noted that Hobson’s Bay (West) and Dandenong (East) Council Areas sit as no. 1 and no. 2 respectively in terms of the number of sites on the EPA’s Contaminated Sites Register.
10.4	Is there a legal “guarantee” to schools, traders and residents along the rout in question that all vehicles will be covered whilst in transit? That is, no leakages, no vehicle breakdowns, no accidents and no delay in tackling any of the above should they occur. All are possibilities that could be disastrous to the community should they occur.	Innova would expect to be prosecuted under the Environmental Protection Act if there were any of its obligations under the act, works approval or licence conditions were not met.
10.5	Re Industry “spin”. As a resident of Altona I attend council meetings	Innova has held several meetings with both councillors and council. Innova has consulted

	Comment	Response
	<p>regularly by the mere fact I am aware during these meetings that I Innova avoid giving full and detailed answers to council is a concern.</p> <p>Consistently, either no answer is forthcoming or delay tactics are presented. Neither are acceptable and therefore are of great concern when it comes to the health and wellbeing of the community.</p>	<p>very broadly in the community and with as many people as possible. Please refer to the earlier section in this response document summarising our extensive consultation efforts over the past (almost) two years.</p> <p>Innova is currently preparing a planning permit application as required under the planning scheme for it's proposal, a requirement that must be met prior to construction.</p>

Submission 11

	Comment	Response
	Refer to the Submission from Jill Hennessy MP	Innova also encourages the EPA to consider the views of local residents and consider the integrity of local public health and wellbeing.

Submission 12

	Comment	Response
	Please refer to the content of the submission	Innova has nothing to add to this submission

Submission 13

	Comment	Response
	Please refer to the content of the submission	Innova has nothing to add to this submission

Submission 14

	Comment	Response
	Please refer to the content of the submission	Innova has nothing to add to this submission