Permission pathway form

Environment Protection Act 2017

Publication F1021 June 2021

About this form

Use this form to get Environment Protection Authority Victoria's (EPA) opinion about which permission pathway is most suitable for your proposed prescribed permission activity.

Completing the permission pathway process is not compulsory. It is designed to assist applicants in the preparation of a final permission application and has no application fees. It is also not a statutory decision.

The pathway outcome is based on the information submitted to us. This decision may change, however, if EPA detects discrepancies in the information provided, discovers risks that were not previously realised, or where significant stakeholder concerns are identified. EPA will inform applicants when there is a need for more information.

For some situations, it may not be necessary to complete a permission pathway form to receive a pathway outcome. Where the required permission is clear, an applicant seeking a permission opinion can do so as part of a meeting or by corresponding with EPA.

Permission pathway outcomes

Permission pathway outcomes include:

- no permission is required
- prescribed exemption applies
- application for a permission is required.

If your pathway outcome is that you need to apply for a permission, EPA will specify the type of permission required. Permission types include a development licence (either fast-track or standard), operating licence, pilot project licence, permit, registration, or an exemption from a licence or permit. No permission is required when the activity is not regulated through a prescribed permission by EPA.

How to complete this form

You need to provide both clear and sufficient information about your proposed prescribed activity.

If you're completing this form for the permission applicant, you must have the authority to make this submission on their behalf.

Further guidance on how to complete this form is provided in EPA's publication *Permissions proposal pathway guideline* (publication 1995). If you require more information, you can contact EPA by emailing contact@epa.vic.gov.au or calling 1300 372 842 (1300 EPA VIC).

A completed form and all supporting evidence should be submitted by email to permissions@epa.vic.gov.au

Please note that incomplete forms will be returned to the applicant with a request to provide further information.

Permission pathway form

Environment Protection Act 2017

Section A: Applicant details

Company or business name	Monsbent Pty Ltd			
CEO (or equivalent) name	David W. Henderson (Managing Director)			
CEO (or equivalent) email	dwh@drhenderson.com.au		CEO (or equivalent) contact number	02 8118 3600
Primary contact name	John Sambell			
Primary contact email	john.sambell@drhenderson.com.au		Primary contact number	03 4700 6444
ABN or ACN	ABN	93 002 820 117	ACN	Click or tap here to enter text.
Registered office address	Pitcher Partners NSW PTY LTD MLC Centre Level 22 19-29 Martin PL Sydney 2000 NSW			
Billing email address	dwh@drhenderson.com.au			
List the ID(s) of any current permission (for example, licence, permit, registration) or other approvals (for example, authorisation of discharge or disposal, BEPs) at this location relating to this activity.				
Licence 9379				
If a consultant/environmental auditor has been engaged to prepare the pathway, please provide details:				
Consultant/environmental auditor name				
Email	Click or tap here to enter text.		Contact number	Click or tap here to enter text.

Section B: Key questions

1 PROPOSED ACTIVITY	
1.1 What type of activity is proposed at the premises? Refer to Appendix 1 in EPA publication Permissions proposal pathway guideline (publication 1995) for category of prescribed activities.	
A08 – Waste to energy; L01 – General discharges or emissions to the Atmosphere; F02 – Fibreboard works.	
Proposal/activity name	Installation of Wet Electrostatic Precipitator (WESP) and Heat Plant
Capital cost of proposal/activity	$5,500,000 ($4,500,000 for WESP and $1,000,000 for heat plant). Refer to supporting documentation for detailed costs.

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1.2 Provide a description of what your proposed activity is.	The proposal is to divert air emissions from existing emission points Jet Dryer stack (DP4) and Drum Dryer stack (DP17) to a Wet Electrostatic Precipitator (WESP) which will remove contaminants from the gas stream by a combination of water scrubbing and electrostatic absorption. (Refer to attached Fujian WESP Technical Proposal for further details.) The WESP will produce solid waste, consisting of the particulate material it removes from the gas stream from the dryers. This solid waste will be transferred to a heat plant where it will be burnt as fuel, providing hot air to help heat the dryers. (Refer attached flow diagram). If the EPA determines that a Development Licence is required, Monsbent requests that the approved pathway be a 'Fast Track' Development Licence. Given that the WESP project aims to resolve community concerns and EPA Licence compliance, Monsbent is eager to raise orders for the equipment begin works as soon as practicable.
1.3 Identify if it is a fixed or mobile activity.	Fixed ☒ Mobile ☐
1.4 Provide the address(es) for the activity.	42 Benalla-Yarrawonga Road Benalla Victoria 3672
1.5 Is the proposed activity for the purpose of technology development or as a pilot project? This includes activities that relate to the research, development or testing of a new technology, equipment, plant, process or system. If these conditions apply, provide relevant information; for example, the scale, dimension, purpose and duration.	
YES ☐ (Provide details below) NO ☒	

1.6 Explain how your proposal utilises best available techniques or technologies.	Monsbent has conducted a technical review and assessment to identify abatement equipment options to treat the emissions from the Jet and Drum dryers. The review included abatement equipment options in use in Australia and overseas. The result of the review was that a WESP - combined with a heat plant to deal with the solid waste from the WESP - was identified as being the best available technology that is reasonably practicable to implement for the business. When making this determination Monsbent considered a number of factors, including: the advantages and constraints of each technology; logistics; time frame to implement; sustainability; financial cost; health, safety and environment risks; likelihood of community acceptance; whether the technology was proven in industry; and the likelihood that the technology would achieve the required reduction in emissions. For further details refer to the attached Air Emissions Controls Options Matrix. In addition to the internal technical review, Monsbent has surveyed other engineered wood product manufacturers and has determined that WESPs are the preferred technology in Australia to treat emissions from wood dryers. Other technologies - such as Regenerative Thermal Oxidisers (RTO)- are not commonly in use by Australian engineered wood product manufacturers and so are not considered a proven technology. Monsbent has also engaged a consultant (Ektimo) to conduct modelling of the predicted air emissions from the WESP. This modelling is currently in progress. The modelling will be used to confirm the ground level concentrations of emitted substances at the boundary and at nearby sensitive receptors. The modelling is also expected to demonstrate compliance with the Environment Reference Standard, the EPA Guideline for assessing and minimising air pollution in Victoria (Pub. 1961), and will also demonstrate that risks to human health and the environment have been reduced so far as is reasonably practicable, in line with the General Environmental Duty (GED).

1.7 What emission, discharge or impact to human health or the environment is expected as a result of the proposed activity?
Detail: To where (air, land, water), as what (type of substances), from where (point source, diffuse source, etc.) and quantity (per minute/hour/day, etc.).

The WESP is expected to significantly reduce the current emissions to air from DP4 and DP17, and therefore the site's impact on human health and the environment will also be significantly reduced. Emissions from the WESP will be to air, via a single stack (point source). Substances and estimated quantities are:

Particulate	15	mg/m³	26.25	g/min
Formaldehyde	5	mg/m³	8.75	g/min
VOC	120	mg/m³	210	g/min
NOx	251	mg/m³	439.25	g/min
Carbon Monoxide	314	mg/m³	549.5	g/min

Conversion between mg/m³ and g/min was done assuming the gas flow rate from the WESP stack will be the combined total gas flow rate of the Jet and Drum dryers, which is 1750 m³/min.

Emission concentrations for particulate, formaldehyde and VOC were taken from the WESP supplier's technical proposal (refer supporting documentation).

Emission concentrations for NOx and Carbon Monoxide were taken from Monsbent's historical data (refer supporting documentation).

As noted above, the WESP will also generate solid waste, consisting of the particulate material it removes from the gas stream from the dryers. This solid waste will be transferred to a heat plant where it will be burnt as fuel, providing hot air to help heat the dryers.
The WESP will also generate waste water, which will contain water-soluble substances removed from the gas stream. This waste water will be sent to the particleboard Presslines and used to replace some of the potable water which is currently added to wood chip before it is pressed into board.

Emissions from the heat plant should only be combustion gases. However, as the heat plant will provide some of the energy to the dryers which would normally be provided by the combustion of natural gas and sander dust, the overall amounts of NOx and Carbon Monoxide should be within the limits specified above.

1.8 If you currently hold a permission for the activity, will there be changes to your permission as a result of this proposal?
Highlight the proposed changes and provide supporting evidence to demonstrate how any change will/will not impact the environment.

Monsbent holds a current EPA licence (#9379) which allows emissions to air from the Jet and Drum Dryers (DP4 and DP17 respectively). These emissions to air will be diverted to the WESP, so Monsbent is proposing that DP4 and DP17 be removed from the licence and replaced by a new discharge point. Monsbent proposes that emissions limits for this new discharge point will be in line with the expected performance of the technology. Details will be included in a subsequent development licence application.

1.9 Provide details of the background environmental condition, siting consideration, planning zone and sensitive receptors surrounding the activity. Please provide detailed maps and figures identifying each.

Refer to attached documentation.

1.10 Provide details of a risk assessment identifying the hazards to human health and the environment from the activity. How have these risks been eliminated or reduced so far as reasonably practicable?
Refer to attached risk assessment.
1.11 Provide details of your engagement, authorisations and permissions for the proposed activity from regulatory authorities other than EPA. Detail your engagement to date and list any authorisation or permission you require, currently hold or are seeking.
Monsbent has sought advice from Benalla local council as to whether planning permission will be required for the construction of the WESP, however, Monsbent does not believe that planning permission will be required. Monsbent has also contacted North East Water to ensure that a sufficient supply of water will be available for the WESP.

2 COMMUNITY AND THIRD-PARTY ENGAGEMENT

2.1 Have you identified potential impacted/interested stakeholders, community or third parties and engaged with them regarding this activity?
YES ☒ (Provide below details of what type, with whom, how and when you engaged) NO ☐ (Provide below reasons and what engagement you plan)
Monsbent has identified impacted/interested stakeholders as: • Local community (residential) • LS Precast concrete facility (industrial) • EPA Monsbent has been holding regular meetings (via Zoom) to engage with stakeholders and discuss their environmental concerns. At these meetings Monsbent has discussed abatement equipment options (including a WESP) with stakeholders and explained how different abatement equipment works and the expected impact on emissions. The last community meeting was held on 21/7/2021 and included local residents, EPA representatives and employees from LS Precast.
2.2 Describe the outcome of engagement and consultation, the response of stakeholders, any concerns raised and explain how you have resolved these concerns. Provide EPA with evidence that stakeholders know about your proposal, including stakeholder contact information (for example, scanned attendance list with contact information), a copy of or link to engagement material, a stakeholder register (including issues raised/resolved).
The response of stakeholders to the proposal has been positive as air emissions (specifically, wood particles and blue haze)are a particular concern to some local residents. Noise was raised as a concern by one local resident, however Monsbent was able to determine the noise level of the WESP from the supplier's technical proposal and was able to advise stakeholders that the WESP will not increase the site's overall noise level.

Section C: Supporting evidence

Ensure all commercially confidential material is marked as such in the document itself.

☐ Administrative:

- Certificate of Incorporation (Company), or
- Certificate of Registration (Business) as appropriate.

☐ Plans, maps and diagrams:

- site plan
- locality plan
- planning zone map
- map showing sensitive receptors surrounding the activity
- design drawings
- block flow (BFD), process flow (PFD) and/or piping and instrument (PID) diagrams.

☐ Engagement/consultation:

- evidence of engagement/consultation
- stakeholder register identifying issues and concerns, method and date of engagement, names of participants, any engagement templates, materials and supporting information.

Insert extra rows, as required, by clicking on the '+' button that appears on the right-hand side of the table when you select the final row.

Optional supporting evidence	Commercial-in-confidence?	Relevant question number
Fujian WESP Technical Proposal	☐	1.2
WESP detailed costing	☐	1.1
WESP Flow Diagram	☐	1.2
Monsbent historical emissions data from Jet and Drum Dryers	☐	1.7
WESP Risk Assessment	☐	1.10
Air Emissions Controls Options Matrix	☐	1.6
Certificate of Incorporation (Company)	☐	Section C: Administrative
Site Plan	☐	Section C: Plans, maps and diagrams
Locality Plan	☐	Section C: Plans, maps and diagrams
Planning Zone Map	☐	Section C: Plans, maps and diagrams
Sensitive Receptors Map	☐	Section C: Plans, maps and diagrams
Community Meeting Minutes	☐	Section C: Engagement/consultation
Community Meeting Presentation	☐	Section C: Engagement/consultation

Section D: Declaration

Important: Applicants should be aware that it is an offence under the Act to intentionally or negligently provide incorrect or misleading information to EPA, or to conceal information.

Before you sign the declaration, ensure that:

- you have answered every question
- you have attached any required supporting documentation
- all the information you have given is true and correct to the best of your knowledge
- you have the necessary authority or permission to submit the application.

I declare to the best of my knowledge that the information provided in this form and any attachments is true and correct.			
Full Name	David W. Henderson		
Company Position	Managing Director		
Signature		Declared at:	SYDNEY NSW.
		Date	16.8.21

The personal information on this form and any correspondence, notice or other document issued after processing of this information will be stored and used by EPA for the purpose of administering the *Environment Protection Act 2017* and the Environment Protection Regulations 2020. You may access this information by contacting the EPA Privacy Information Officer. This information may be disclosed to another Government organisation, tribunal or court, where required for administering or enforcing the above Act and Regulations or any other relevant laws.

You have the right to access this information by contacting the Environment Protection Authority at 200 Victoria Street, Carlton VIC 3053, or by email contact@epa.vic.gov.au or telephone 1300 372 842 (1300 EPA VIC).

For languages other than English, please call 131 450.
Visit epa.vic.gov.au/language-help for next steps.
If you need assistance because of a hearing or speech impairment, please visit relayservice.gov.au