

RE: EPA Approvals Proposal Pathway Form July 2019, Licence Application

1. Energy use and greenhouse gas emissions – identify energy use and how greenhouse gas emissions are reduced.

Energy use – see Power and Gas bills showing annual power used. It is our intension to reduce gas usage by using faster solubolising polymers in the near future .We are currently building a new/secondhand solubolisation plant to minimize the gas usage and further minimize power useage.

We have installed 400 solar panels (80 Kw) on the factory roof in order to reduce the cost of our power and the green house gas emissions.

We have also replaced all the lights in the premises with LED lights further reducing the power usage. All this has cost hundreds of thousands of dollars. Before the Solar installation in 2012 we used \$7000 worth of power per month. Now we use about \$870 per month even with the higher prices .

2. Water Use – how is water used on site, volumes.

Apart from the normal toilets and hand taps in bathrooms, water is commercially used to make adblue and to hot clean drums and IBCs . The water from the Adblue is run through .3 micron carbon filters and feed into a separate system and we have a meter on that which we pay per litre of water disposed of. The small amount of water and steam water from the drum washing is treated in our triple interceptor and any residue is captured and taken away by our waste collectors every 6 to 12 months --. JJ Richards.

3. Aim emission (including odour and dust) – what emissions are caused from the activity,

At the cleaning site which is outside there is virtually no odour. In the painting booth there are some paint emissions and these are dissipated into the air via an exhaust fan.

There is no dust produced at all.

There is some paint over spray produced and this is captured in our spray booth water trap.

what are the impacts, There are no real impacts at all. Our painter wears a mask as a precaution.

how are these controlled. There is nothing more to control.

4. Noise emissions –

what could cause noise emissions at the facility,

Large pumps could cause some noise. The radio they listen to by far produces the most noise.

what are the impacts, Not much in the way of impacts

who is impacted, The workers in the factory

how are these controlled. Workers have the option to wear earplugs if they require it. These are provided for them.. they generally don't because they want to listen to the radio.

5. Water discharge (stormwater) –

how are impacts to stormwater

prevented and reduced We cannot stop stormwater from falling on the premises.

how is stormwater protected to avoid contamination. We have bunded areas to hold any potential contamination.

We have drain access with close off valves to stop any contamination from entering the storm water system during loading and unloading tankers . Anything in the bunded areas can be treated by the triple interceptor which is automatically turned on if the water level rises.

6. Land and groundwater –

how are impacts to land and groundwater

prevented and reduced and are they protected to avoid contamination. As above .

7. Waste Management –

identify wastes received on site, There is almost no waste received on site. volumes, Sometimes 250 ml

how are these managed. These are sucked out by vacuum into a waste drum and disposed of via our waste collectctors

What waste is generated on site, Again very little waste generated on site. Some contaminated oil and solvents from cleaning. volumes, Maximum 3000 Lt last year. It is anticipated that this will reduce further this year due to draining of the additive drums more thoroughly  
How are these managed. Disposed of via our certified waste collectors.

8. Technology Used on Site – what technology is used on site, is this best practice. We use solar panels, we have water limiting cleaners, It is as good a technology as we know how to use.

9. Community/Stakeholders – have you identified your stakeholders and how have you engaged with them regarding your application for an EPA licence? There is no one what will be adversely impacted by our operation. No we haven't spoken to them about this. We have a good relationship with our neighbours . Our neighbours Downer and Continental Rubber, are also our customers. Our neighbours would be more of an environmental threat to us than us to them.

10. Planning – provide copy of your council planning permit.

To my knowledge we haven't applied for a council permit. I still have to check

11. Emergency Management Plan – provide a copy. Supply ISO plan

12. Site Risk Assessment – provide a copy. Supply ISO plan.

We have just been recertified again for ISO 9001-2015, ISO 14001-2015 & ISO 45001.1018 but our plans are still with our auditor so I will have to get these later.

Regards,  
Murray Crawford  
Managing Director