1. Introduction

This document supports a Works Approval Application (WAA) to the Victorian Environment Protection Authority (EPA) for development of a proposed Energy from Waste (EfW) plant within the existing Australian Paper Maryvale Pulp and Paper Mill Site, based in Maryvale, Victoria (referred to herein as 'The Project'). This document is organised into chapters and supporting appendices, which follows the requirements outlined in the EPA Works Approval Application Guidelines Publication 1658.

The aim of the Project is to allow the proponent, Paper Australia Pty Ltd, known as Australian Paper (AP), to attain a sustainable and long-term stable alternative baseload energy source to provide steam and electricity for the existing Maryvale Pulp and Paper Mill Site (Maryvale Mill) operations. Electricity produced in excess of the Maryvale plant requirements will be provided to the national grid.

The proposed Project will comprise the development of a thermal EfW plant at the existing AP Maryvale Mill Site. The EfW plant will use moving grate boiler technology to recover energy by combusting 650,000 tonnes (+/- 10%) per annum of Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste sourced from the Gippsland region and the greater Melbourne metropolitan area, with the proportions of MSW and C&I fuel used dependant on availability of supply. The plant will provide both steam and power to the existing Maryvale Mill operations of the order of 30 Megawatts electric (MWe) and 130 tonnes per hour of high pressure steam. There will also be a black-start diesel generator approximately 6 MW in size and a 200 kW emergency shut-down generator.

The cost of the Engineering, Procurement and Construction (EPC) contracts associated with the proposed Project is currently estimated to be approximately AUD$650 million. With regard to the fee for the assessment of the WAA, the WAA incurs the maximum number of fee units (i.e. 1% of project cost, capped at a maximum of 4,500 fee units). The value of a fee unit is $14.22 (EPA 2017-18) therefore the total fee payable upon submission of this WAA is $63,990.

The structure of this document is outlined below:

- Chapter 1: (this Chapter): An introduction to the Project, summarising the scope of the proposed works, the history and need for the Project, description of the Project site, details of other regulatory approvals, and AP’s environmental track record
- Chapter 2: An overview of community and stakeholder consultation undertaken to date and future planned consultation activities
- Chapter 3: The findings of a project-wide environmental risk assessment for the Project, taking into account the environmental aspects identified in Chapters 6 to 11
- Chapter 4: A technical description of the Project, including details of the proposed engineering processes
- Chapter 5: Details of how the technologies and practices proposed for the Project represent environmental best practice
- Chapters 6 to 10: The findings of environmental impact assessments related to development of the Project. This addresses impacts to air quality, energy and greenhouse gas, noise, water, waste, land and groundwater as required by the EPA as part of the WAA
- Chapter 11: A brief description of other environmental considerations for the project such as cultural heritage, flora, fauna and local traffic conditions.
- Chapter 12: Outlines the framework for ongoing environmental management during construction and operation of the Project, including development of a Construction Environmental Management Plan (CEMP) and Operations Environmental Management Plan (OEMP)
- Appendix A to Appendix G: Maps, reports, specialist assessments and other supporting information, as referenced throughout this main document.
1.1 Applicant

1.1.1 Company details

Paper Australia Pty Ltd (Australian Paper) is proponent of the proposed EfW plant, and is the current owner and operator of the Maryvale Pulp and Paper Mill site. The ACN of Australian Paper (AP) is 061 583 533.

1.1.2 Contact details

Street address: Australian Paper, Maryvale Site
    Traralgon West Road
    Morwell, Victoria 3840

Postal address: Attn: David Jettner
    General Manager Corporate Development
    307 Ferntree Gully Road
    Mount Waverley Victoria 3149

Jacobs Group (Australia) Pty Ltd has assisted AP with this report and the associated technical assessments. For general enquiries in relation to this application, please contact Roger Winders (Jacobs) on +61 (03) 8668 3000

1.2 Scope and purpose of this works approval

This WAA seeks statutory approval to develop an EfW plant to generate electricity and steam for the existing AP Maryvale Mill. Excess electricity will be provided to the national grid.

Works approvals are issued by EPA Victoria under the Environment Protection Act 1970 (EP Act) for the development of, or upgrades to, industrial sites scheduled under the Environment Protection (Scheduled Premises and Exemptions) Regulations 2007 (the regulations).

The Maryvale Mill is currently licenced by the EPA (Licence No 46547) and deemed a ‘Scheduled Premises’ on the basis that it falls under the scheduled categories: A05 (Landfills), F03 (Paper Pulp Mills), and A07 (Composting) under the regulations. A Works Approval is required for the Project pursuant to Section 19A of the EP Act, with the existing Licence likely being amended to include the EfW plant and the additional scheduled category triggered – A08 (Waste to Energy).

The Works Approval, once issued, will allow for construction to take place. It not only addresses construction risks but also sets the scene for commissioning and subsequent operation in terms of the scope of environmental risks. Once constructed, in accordance with EPA regulatory requirements and the guidance and conditions set out in the Works Approval, AP will apply for an amended EPA licence in order to operate the facility, with specific conditions around operation and environmental performance requirements of the Project.

1.3 Project background

1.3.1 Project location

The Project is located in Maryvale (north of Morwell), approximately 150 kilometres (km) east-southeast of Melbourne’s central business district, within the City of Latrobe Local Government Area (LGA).

Figure 1.1 below shows the Project location in a regional context.
The proposed EfW plant is to be located on the existing Maryvale Mill as its primary purpose is to provide both steam and electricity to the existing industrial facility.

Located in the Latrobe Valley, the Project is in the vicinity of heavy industrial facilities including coal and gas-fired power stations, steel fabrication, dairy production, water processing and heavy and light industrial premises. The Maryvale Mill, on which the EfW plant will be located (the Project Site), has manufactured pulp and paper products since 1937. The Latrobe Valley is largely rural-residential with an approximate population of 72,000.

The area surrounding the Project site traverses a landscape that contains natural resources, including the Latrobe River within 1.5 km to the north and 1.2 km to the northeast of the Project site, and the Wades, Plough, and Waterhole Creeks within 1.4 km to the southeast. Land surrounding the Latrobe River is used for various farming activities including dairy farming and grazing. Land to the east contains sand quarries and plantation forestry, while land to the south and west comprise areas used for plantation forestry.

The Maryvale Mill is located between the Tanjil East and Traralgon West roads within a small valley surrounded by plantation forest. The township of Traralgon is centred approximately 7 km to the east and the township of Morwell is centred approximately 7 km to the southwest. The nearest residences are located approximately 2 and 2.5 kms from the proposed location of the Project Site (to the south and northwest respectively), with the next nearest residences more than 3km from the EfW site. There is an existing amenity rural buffer included in the planning scheme.

The operational footprint of the Project Site will be approximately 7-10 hectares. The construction footprint of the EfW plant including laydown, parking, access/egress, construction and crib areas will be approximately 19 ha, and is within the existing Maryvale Pulp and Paper Mill site, owned by AP. The existing Maryvale site is approximately 620 ha.

The Project Site is within the Gippsland Plains bioregion and under the jurisdiction of the West Gippsland Catchment Management Authority (WGCMA) and in the Latrobe City Council local government area. The Project Site has been historically disturbed and was partially used as a storage area for timber to be used by the mill prior to 1955, after which point only the western portion of the Project site was used for timber storage. A car park has occupied a small area in the northern portion since the early 1960s while the eastern portion largely remained vacant until 1999, when it was seeded for plantation timber growth, which remains its present state.

The Project site is shown in Figure 1.2 below.
1.3.2 Rationale of the Project

The Maryvale Mill requires thermal energy (high pressure steam) and high voltage (HV) electricity. A significant proportion of the steam is generated from the combustion of black liquor, a by-product of the pulping process. The additional steam demand is produced by natural gas fired boilers. The high pressure steam is also used by four on-site turbine generators to produce about 45 MWe. Additional HV electricity is supplied from the National Electricity Market (NEM).

The Maryvale Mill purchases approximately 6PJ of Natural gas annually and also purchases on average, 30MWe of Electricity. Significant effort has been invested to improve the energy efficiency per net tonne of pulp and paper. However, due to the substantial cost increase in the market price of natural gas and the grid electricity price, an alternate baseload energy source is being sought to enable the mill to continue to operate in a reliable, sustainable and cost effective manner.

Taking into account total costs (capital and operating), environmental impacts, employment effects, plant performance and reliability, there is a clear group of technologies that were deemed appropriate and adopted on a dominant world wide scale – that is EfW combustion technologies utilising MSW feedstock.

There is currently sufficient capacity to provide the expected 650,000 tonnes (+/- 10%) per annum (tpa) of MSW required, with an estimated 550,000-600,000 tpa expected to be sourced from greater Melbourne, with 50,000-100,000 tpa from Gippsland. Additional rationale for the project includes the future of landfills in south east Melbourne, which are closing or will be closed in the next few years and the need to elevate the disposal of waste on the Waste Hierarchy. Currently, only around 50% of waste is recycled and the projected population growth of Melbourne will see an additional ~600,000 tpa of waste generated by 2025.

AP has been allocated both Federal ($2.5M) and State Government ($2.5M) support and has contributed $2.5M to develop a Feasibility Study. This study is aimed to be completed by June 2018 to determine if the project should proceed and allow AP to be prepared for the Metropolitan Waste and Resource Recovery Group (MWRRG) and Gippsland Waste and Resource Recovery Group (GWRRG) tender Expressions of Interest (EOI) in Q2/Q3 2018. This WAA forms part of this preparation for the EOI processes.

1.3.3 Project benefits

AP is one of the largest employers in the Latrobe Valley with around 850 direct full time employees and the feasibility study provides a platform for continued innovation at the plant to ensure a sustainable, long term future for the Maryvale Site. The application of EfW would be a critical step for AP’s regional operations, reducing reliance on external energy sources and maintaining the existing manufacturing footprint within an already established, large buffer zone (approximately 15.5 km²).

If successfully implemented, the Project will have a range of important benefits for the local community and for the state/country, including:

- Helping to secure the future of the AP Maryvale site and the jobs of the 850 direct employees
- Providing an additional 1,600 jobs during the construction phase and more than 440 jobs during the operational phase
- Diverting 650,000 tonnes (+/- 10%) of waste from landfill each year, to a higher order use as per the Waste Hierarchy
- A net reduction in greenhouse gas emissions of approximately 550,000 tonnes per year, the equivalent of taking approximately 100,000 cars off the road
- Improving energy security by returning approximately 3-4PJ of natural gas pa and 30MWe to the broader market, helping to improve energy security for the state and country.
1.3.4 Land use planning

The *Planning and Environment Act 1987* controls land use and development in Victoria. The Planning Scheme of each local government municipality is the instrument through which development is controlled and land use zones are defined. Planning zones in the vicinity around the Maryvale Site are given in Figure 1.3.

The AP Maryvale Site (containing the EfW Project site) is located within the Industrial 2 Zone (IN2Z) under the Latrobe Planning Scheme. The broader area surrounding the EfW Plant contains large industrial premises including several open cut brown coal mines and associated power stations, water treatment plants, quarries, a dairy processing facility and numerous light industrial premises. AP also own land to the east of the Mill site, containing an existing water treatment pond and discharge system, which is within a Farming Zone (FZ). However, no works associated with the Project or this WAA will occur in this area, and hence assessments and considerations are given predominantly for the Project site and the Maryvale Mill site. Figure 1.3 below shows the planning zones in the vicinity of the Project site, the Maryvale Mill site, and the greater AP land ownership area. The land is zoned to support ongoing development of industrial and manufacturing activities. The site is also subject to a Bushfire Management Overlay (BMO).

Under the Latrobe Planning Scheme, the development would be defined as an Industry. In the Industrial 2 Zone, the use of the land for an Industry is a Section 2 – use permit required. Therefore, a planning permit is required for buildings and works to facilitate the EfW plant within the Industrial 2 Zone. Setback distances for a use involving ‘Combustion, treatment or bio-reaction of waste to produce energy’ in accordance with Clause 52.10 (Uses with adverse amenity potential) are variable and dependent on the processes to be used and the materials to be processed or stored. Such setback distances will fall within the existing buffer for the Maryvale Mill.

Clause 52.10 (Uses with adverse amenity potential) is applicable to development and use permit applications for industries and warehouses that have the potential to cause offence or risk to the surrounding neighbourhood. Within Clause 52.10 the EfW plant may likely fall within the category of ‘Recycling and Resource Recovery’ – sub-category Combustion, treatment or bio-reaction of waste to produce energy.
Figure 1.3: Planning Zones

Legend
- Maryvale Mill
- Project Area
- Population centre
- Minor road
- Major road
- LGA Boundary

DATA SOURCES
© Commonwealth of Australia (Geoscience Australia) 2006 Geodata Topo 250k Series 3; Vicmap Data © State of Victoria 2018; Department of Environment, Land, Water and Planning 23/04/2017; Jacobs 2017

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1.3.5 History of the existing Maryvale Paper Mill

A pulp and paper mill was established by Australian Paper Manufacturers (APM) in 1937 to the north end of the Maryvale site, to make use of local timber (Australian Paper 2017; Tout-Smith 2003; Victorian Places 2015a). APM secured a 900-acre site which included two dairies, water access to the Latrobe River, and a direct transmission line from Yallourn to provide power. The Maryvale rail spur, which branches from the Gippsland Rail Line at Morwell, was commissioned by APM during the late 1930s to transport paper by rail from the Maryvale Mill to Melbourne freight terminals (Debtech 2014). The project area is located within this site.

Table 1.1 below gives a summary of the plant history.

Table 1.1: Maryvale Mill key historical events

<table>
<thead>
<tr>
<th>Year</th>
<th>Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>1936</td>
<td>Construction of Maryvale Mill begins in Morwell</td>
</tr>
<tr>
<td>1937</td>
<td>First production of pulp</td>
</tr>
<tr>
<td>1938</td>
<td>First pilot runs of paper produced</td>
</tr>
<tr>
<td>1940</td>
<td>No.1 paper machine begins production</td>
</tr>
<tr>
<td>1943</td>
<td>Production of wood cellulose as substitute gun cotton for Australian defense forces in WW2</td>
</tr>
<tr>
<td>1951</td>
<td>APM Forests formed to establish plantations in proximity to the mill</td>
</tr>
<tr>
<td>1952</td>
<td>No.2 paper machine begins production</td>
</tr>
<tr>
<td>1968</td>
<td>Neutral sulphite semi-chemical (NSSC) pulp mill begins production</td>
</tr>
<tr>
<td>1973</td>
<td>No.3 paper machine begins production</td>
</tr>
<tr>
<td>1977</td>
<td>No.4 paper machine begins production production of liner board for cardboard boxes</td>
</tr>
<tr>
<td>1983-1984</td>
<td>The Kraft Continuous Mill, a new re-causticising plant, recovery boiler 6 and No 4 evaporator system were installed</td>
</tr>
<tr>
<td>1987</td>
<td>No.3 paper machine rebuilt to produce white office papers, which included installation of a pulp bleaching plant</td>
</tr>
<tr>
<td>1994</td>
<td>The AP Maryvale Community Consultation Committee (CCC) was formed to provide a formal mechanism through which the community and the Maryvale Mill could discuss concerns relating to the environment.</td>
</tr>
<tr>
<td>1996</td>
<td>No.4 paper machine upgraded and waste paper recycling plant installed</td>
</tr>
<tr>
<td>1997</td>
<td>The upgrade of the effluent treatment system occurred, which included the installation of a secondary clarifier</td>
</tr>
<tr>
<td>1998</td>
<td>Maryvale No.5 machine began production of high performance office paper</td>
</tr>
<tr>
<td>2000</td>
<td>The installation of foul gas collection system and No 8 foul gas incinerator was completed which significantly reduced odour emissions</td>
</tr>
<tr>
<td>2002</td>
<td>Upgrades of aerators on #1A Pond – improvement of wastewater treatment</td>
</tr>
<tr>
<td>2002-2003</td>
<td>Upgrades on No. 2 Pond – improvements to final effluent treatment pond, including construction of new walls to remove “dead legs” and dredging sludge from the pond.</td>
</tr>
<tr>
<td>2006</td>
<td>Australian Paper becomes a foundation member of Forest Stewardship Council – FSC® Australia</td>
</tr>
<tr>
<td>2008</td>
<td>PineGro commence composting operation onsite at Maryvale – diverting ~80,000T/pa of waste from the Maryvale landfill to beneficial reuse – this has now increased to ~105,000T/pa in 2016-17</td>
</tr>
<tr>
<td>2008</td>
<td>New Elemental Chlorine Free (ECF) bleaching plant and upgraded existing pulp mills began operations, including upgrades of the existing wastewater treatment system</td>
</tr>
<tr>
<td>2015</td>
<td>Maryvale $90 million wastepaper recycling and deinking plant began production</td>
</tr>
<tr>
<td>2018</td>
<td>80 years anniversary of papermaking at Maryvale</td>
</tr>
</tbody>
</table>

The Maryvale Mill was originally owned by Australian Paper Manufacturers (APM), which became Amcor Limited in 1986. PaperlinX Limited was formed after demerging from Amcor in 2000, and its manufacturing business, AP, was subsequently purchased by Nippon Paper Group in 2009. The current operator of the Maryvale Mill is AP.
Over the 80 years of pulp and papermaking at the Maryvale site there has been substantial capital investment resulting in AP being Australia’s leading manufacturer of printing and writing products, Australia’s only manufacturer of recycled content bag and envelope papers, and a major supplier of Kraft liner board.

As well as the major strategic investments listed above, maintenance, essential replacement, and process, environmental and safety improvements require an annual capital expenditure of between $20m and $30m. A substantial part of this is expended within the Latrobe Valley to local suppliers and services.

The Maryvale Mill is one of the largest employers in the Latrobe Valley. As with many manufacturing industries, there is significant economic pressure on AP’s bottom line and its ability to remain a financially viable operation. Notwithstanding the challenging economic period, AP continues to provide on-going employment opportunities and is a major contributor to the Latrobe Valley and broader economies. As part of AP’s future planning, it continues to operate apprentice and engineering graduate programs, as well as vacation placement programs for university students.

1.3.5.1 History of the EfW plant concept

Combustion of waste has occurred in large scale facilities for hundreds of years. During the 1980’s the impacts of simple incineration became much better understood and toxic elements were identified as by-products along with combustion by-products such as oxides of nitrogen (NOx) and oxides of sulfur (SOx).

European legislation was enacted to protect the health and environment starting from 1990 through to 2002 and it eventually mandated the strictest emission standards compared to any other industry. This forced the closure of many old generation facilities. The emissions standards were set in the European Union’s Waste Incineration Directive 2000/76/EC (WID), which was recast into the Industrial Emissions Directive 2010/75/EU (IED).

Technological development responded to these requirements with all plants (new and old) required to meet the IED by end of 2005. The three EPC tenderers for this project are world leaders as designers, constructors and operators of EfW Plants. Responding to increasing waste and reducing landfill space there has been expansion of EfW Plants world-wide, particularly in Europe and Asia, as shown on Table 1.2 below.

Table 1.2 : EfW Plants around the world (footnotes were information sources)

<table>
<thead>
<tr>
<th>Region</th>
<th>Number of EfW plants installed</th>
<th>% Plants with thermal combustion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Japan</td>
<td>~1000²</td>
<td>84%³</td>
</tr>
<tr>
<td>Europe</td>
<td>455⁴</td>
<td>France 90%³, Germany 95%³</td>
</tr>
<tr>
<td>China and South Korea</td>
<td>~120¹</td>
<td>~90%²</td>
</tr>
<tr>
<td>USA</td>
<td>86¹</td>
<td></td>
</tr>
</tbody>
</table>

1.4 EfW project

The proposed EfW plant will utilise moving grate boiler technology to recover energy by thermally treating 650,000 tonnes (+/- 10%) per annum of Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste sourced from the greater Melbourne metropolitan area and the Gippsland region. The plant will be a cogeneration (also known as a combined heat and power (CHP)) system, providing both steam and electricity to the existing Maryvale Mill operations. The plant is expected to produce approximately 30 Megawatts electrical energy (MWe) and 130 tonnes per hour of high pressure steam. There will also be a smaller, black-start 6MW diesel generator and a 200 kW emergency shut-down generator.

³ Earth Engineering Centre, Columbia University “Municipal Solid Waste Management and Waste-to-Energy in the US, China and Japan” 2013
Figure 1.4 shows a simplified typical process overview for an EfW plant. For further detail about the EfW process refer to Chapter 4: Engineering processes.

![Figure 1.4: Typical process overview for an EfW plant](http://www.arc21.org.uk/opencontent/?itemid=27&section=Residual+Waste+Project)

The transport of the MSW and C&I waste from south-east Melbourne is a key aspect of this project. The established railway and truck access is one of Maryvale’s advantages compared to other potential locations for an EfW plant (e.g. metropolitan Melbourne). The Maryvale Mill already operates the largest privately owned weighbridge in Victoria. The proportion of railway delivery will be determined by the negotiations with the Melbourne Councils as part of the tender process and the likely transfer station in Melbourne is beyond the scope of this application.

The Gippsland MSW would be transported by truck to Maryvale, rather than to existing landfills. This would require minor changes to traffic flow, however, the Maryvale Mill’s existing truck access and movements is a major advantage. Impacts due to transport are expected to be minimal (see Chapters 2 and 11).

1.4.1 Project implementation timeframe

Although the project has not gone through detailed scheduling or financial approval, indicative key Project implementation dates are given below:

- Completion of feasibility study June 2018
- Metropolitan & Gippsland Waste and Resource Recovery Groups EOI tender process Q2/Q3 2018
- Final Approval and Funding (Final Investment Decision) October 2019
- Start of Construction in November 2019
- Start of Commissioning in September 2022
- Project completion in September 2023.

1.4.2 Key construction activities

The construction of the EfW plant is expected to take approximately 3 years from commencement. The key construction elements include:

• Civil works
• Bulk earthworks
• Concrete and structural works
• Steel fabrication and installation
• Utility connections and ancillaries
• Mechanical works and plant installation
• Electrical and control systems
• Road and rail installation on the Maryvale Site (private property).

1.4.3 Key operational activities

The existing Maryvale Site currently operates on a 24 hour / 7 day per week basis producing pulp and paper products as well as generating electricity and steam to power the processing facilities and associated infrastructure. The annual hours of the existing plant operation are not expected to change as a result of this project.

There are a number of different options and configurations possible for providing the required electrical generation and steam flows from the EfW plant to the Maryvale Site and optioneering will continue throughout the design phase to best optimise plant performance and configurations. The EfW plant will however need the functionality to be able to operate under a range of different operating scenarios. Some of these operating scenarios are listed below:

1) Day to day operation of providing the Maryvale Site with process steam. This process steam amount will vary depending on the steam requirement at the Maryvale Site at that particular point in time and will be a controlled flow that the EfW plant can respond to. This can account for the times where the Maryvale Site has a reduced demand under a part mill shutdown for instance.

2) The EfW plant will also be designed to operate such that during times of peak steam demand it can trip the turbine and provide the maximum possible amount of steam to the Maryvale Site. This will be facilitated through the use of a turbine bypass.

3) Similarly, the EfW plant will be designed to operate under the scenario where the process steam requirement to Australian Paper is zero i.e. during times where Australian Paper is under a complete mill outage or at other times where it is deemed necessary to generate as much electricity as possible (i.e. during times of high demand on the electricity grid).

1.4.4 Decommissioning

Although the WAA does not require decommissioning activities to be described, the EfW plant will be designed for a 25-year life and if operated successfully will likely be in operation beyond 25 years. A decommissioning plan would be developed closer to the end of the plant’s life.

1.5 Other regulatory approvals

The Project is subject to a range of additional environmental and development related approvals required under various Commonwealth and State legislation. Table 1.3 summarises the applicability of the legislation, including those that have already been obtained and additional (new) approvals required prior to the commencement of development or operations. These approvals are not directly relevant or dependant on the WAA (with exception to the EPA Licence Amendment), however this information is provided to understand the broader regulatory context.
Table 1.3: Approvals considered and their applicability to the Project

<table>
<thead>
<tr>
<th>Approval</th>
<th>Project phase</th>
<th>Applicable</th>
<th>Legislation</th>
<th>Regulator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Referral under the Environmental Protection and Biodiversity</td>
<td>Construction</td>
<td>No</td>
<td>EPBC Act (Cwlth)</td>
<td>Department of the Environment and Energy (DEE)</td>
<td>It is unlikely that an EPBC referral will be required. A referral may be required if Matters of National Environmental Significance (MNES) protected under the EPBC Act are determined to be impacted.</td>
</tr>
<tr>
<td>Conservation Act 1999 (EPBC Act)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Environment Effects Statement</td>
<td>Construction</td>
<td>To be determined</td>
<td>Environmental Effects Act 1978 (Vic)</td>
<td>Department of Environment, Land, Water and Planning (DELWP)</td>
<td>An EES Referral has been submitted to DELWP to determine the necessity of an EES. Based on similar project in the region, and EES is not expected to be required.</td>
</tr>
<tr>
<td>Commissioning Approval (30A)</td>
<td>Commissioning</td>
<td>Yes</td>
<td>Environment Protection Act 1970 (Vic)</td>
<td>Environmental Protection Authority (EPA)</td>
<td>Subject to Works Approval, AP will need to apply for a commissioning approval (during construction of the plant) to allow for emissions during the commissioning phase of the project.</td>
</tr>
<tr>
<td>Planning Permit</td>
<td>Construction</td>
<td>Yes</td>
<td>Planning and Environment Act 1987</td>
<td>Department of Environment, Land, Water and Planning (DELWP)</td>
<td>Under the Latrobe Planning Scheme, the development would be defined as an Industry. In the Industrial 2 Zone, the use of the land for an Industry is a Section 2 – use permit required. Therefore, a planning permit is required for buildings and works to facilitate the EfW plant within the Industrial 2 Zone.</td>
</tr>
<tr>
<td>Cultural Heritage Management Plan</td>
<td>Construction</td>
<td>No</td>
<td>Aboriginal Heritage Act 1996 (Vic)</td>
<td>Aboriginal Affairs Victoria (AAV)</td>
<td>Whilst the proposed works are defined as a high impact activity, the project area does not intersect with any designated areas of cultural heritage sensitivity (CHS). Therefore, a mandatory Cultural Heritage Management Plan (CHMP) is not required. A voluntary CHMP has not been recommended as the project area has been heavily disturbed by prior activities associated with the Maryvale Mill.</td>
</tr>
<tr>
<td>VicRoads</td>
<td>Construction</td>
<td>Possibly</td>
<td>Planning and Environment Act 1987</td>
<td>VicRoads</td>
<td>The site adjoins the Traralgon West Road and Tanjil East Road that are both Road Zone, Category 1. A planning permit is triggered under Clause 52.29 for alterations to a road or to create an access way to a road in the Road Zone, Category 1. Applications under this Clause require a Section 55 referral to VicRoads. At this stage, no alterations to these roads are planned.</td>
</tr>
</tbody>
</table>
## Works Approval Application

<table>
<thead>
<tr>
<th>Approval</th>
<th>Project phase</th>
<th>Applicable</th>
<th>Legislation</th>
<th>Regulator</th>
<th>Description</th>
</tr>
</thead>
</table>
| Bushfire Management Overlay      | Construction  | Yes        | Planning and Environment Act 1987 (P&E Act)                                   | Country Fire Authority (CFA)| The application is required to be referred to the relevant fire authority being the CFA pursuant to Clause 66.03 (Referral of permit applications under other State standards provisions) of the Latrobe Planning Scheme. Referral to the CFA is triggered under the Bushfire Management Overlay (BMO). However, Referral of the application to the CFA is not required if the applicant satisfies Council that the CFA has:  
  • Considered the proposal for which the application is made within the past three months  
  • Stated in writing that it does not object to the granting of a permit for the proposal. |
| Permit to take                   | Construction  | No         | Flora and Fauna Guarantee Act 1988 (Vic)                                    | DELWP                      | The Project Site is largely plantation and therefore highly unlikely to support any native vegetation, threatened species and/or threatened species habitat or threatened ecological communities. Further, a FFG ‘Permit to Take’ would not be required as the Project is within private land. |
| Native vegetation removal        | Construction  | No         | P&E Act; Permitted clearing of native vegetation - Biodiversity assessment guidelines (2013) | DELWP                      | It is unlikely that native vegetation will be removed for the Project as the Project site is highly disturbed in nature, with little native vegetation present. Areas modelled as Plains Grassy Forest are likely to be areas of plantation timber, as indicated by the uniform nature of the vegetation present. A permit will need to be obtained from the Latrobe City Council for the removal of native vegetation should the removal of native vegetation be required. Appropriate native vegetation offsets would also need to be secured. |
| Major Hazardous Facility         | Operation     | Yes        | Occupational Health & Safety Act 2004 (Vic)                                  | WorkSafe Victoria          | The Maryvale site operates under licence as a Major Hazardous Facility. There is a requirement to notify WorkSafe of any proposed changes to the site’s Safety Case. This notification is in progress. This application may also be referred to WorkSafe Victoria. The EfW Plant will be using natural gas, a schedule 9 material, which will require a review of the Safety Case, along with consideration of the impact of the new plant on the site’s MHH risk profile. |
| Dangerous Goods                  | Operation     | Yes        | Occupational Health & Safety Act 2004 (Vic)                                  | WorkSafe Victoria          | Under this legislation there is a requirement to consult with the CFA regarding storage and handling arrangements for Dangerous Goods. |
1.6 Environmental track record

AP holds an EPA licence (Licence No 46547) pursuant to Section 20 of the EP Act. The existing Maryvale Site is deemed a 'Scheduled Premises' on the basis that it falls under the scheduled categories: A05 (Landfills), F03 (Paper Pulp Mills) and A07 (Composting) under the regulations. The addition of the EfW plant is not expected to have any deleterious or cumulative impacts on existing environmental aspects at the Maryvale Mill.

Table 1.4 and Table 1.5 below summarise the environmental performance and community concerns received for the existing AP Maryvale Mill over the past three years.

<table>
<thead>
<tr>
<th>Year</th>
<th>Issue</th>
<th>Compliance detail / issue</th>
</tr>
</thead>
</table>
| 2015 | Trade Waste Pipeline Failure | Following a failure in an old section of the Trade Waste pipeline and subsequent spill in Jun 2015 the EPA issued the following:  
- Notice to Identify Occupier  
- Notice to Produce  
- Record of Interview  
  It is standard practice for the EPA to issue these notices when investigating such an incident. AP complied with all EPA requirements and undertook significant clean up and monitoring. Upon completion of the investigation the EPA issued a Penalty Infringement Notice.  
  In response to the line failure AP instigated a number of short term countermeasures to reduce the risk of further incidents – including installation of additional alarms and diversion of surface drains in the vicinity of the old section of pipe to ensure any future loss of containment incidents could be contained. The longer term response was to replace the section of old pipe (~800m), this was a significant project for Maryvale, both in terms of design and cost (~$1M). The pipe replacement commenced in 2016 and was completed in 2017. |
| 2016 | Trade Waste Pipeline Failure | A further failure of the old section of pipeline occurred in Nov 2016.  
  The countermeasures initiated in response to the 2015 failure (above) were successful in minimising and containing the spill.  
  The EPA was happy with both the immediate response to the incident and the progress of the pipeline replacement.  
  A Pollution Abatement Notice was issued requiring AP to complete the replacement of pipeline (already in progress) and report to the EPA.  
  The new pipeline was commissioned in March 2017, and upon receipt of the close out report the EPA revoked the notice. |
| 2016 | Lime Klin Particulate measurement during purge events, R5, R6 & Lime Klin DCS flow validation and completion of CEMS manual | In 2016 the EPA undertook a Major Industry Assessment at the Maryvale site – a routine activity for large and complex sites.  
  This assessment resulted in 6 recommendations and 3 requirements which were formalised by 2 Pollution Abatement Notices.  
  All required actions were completed and all Pollution Abatement Notices have been revoked by the EPA. |
Table 1.5: Community concerns or public feedback received

<table>
<thead>
<tr>
<th>Date</th>
<th>Issue</th>
<th>Complaint or public feedback</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 - 2017</td>
<td>Odour</td>
<td>Public complaints regarding odour have been received either directly from the public or via the EPA. Whilst complaints generally cannot be independently verified, all complaints received are recorded, rigorously investigated and reported, with feedback provided to the EPA and/or complainant as required. Upon receipt of a complaint AP checks to ensure odour related pollution control equipment is operating correctly, reviews continuous monitoring equipment to determine if any EPA licence breaches have occurred, and investigates the prevailing weather conditions at the time the complaint was received. Adjustments are made to the operation of the mill as required. All of this information is compiled in order to determine if a cause for the complaint can be identified, on some occasions a specific cause is unable to be determined. Any new projects onsite are assessed for the potential to impact on odour emissions, and a number of minor projects are implemented each year to reduce odour sources onsite.</td>
</tr>
<tr>
<td>2014 - 2017</td>
<td>Noise</td>
<td>Public complaints regarding noise have been received either directly from the public or via the EPA. Whilst complaints generally cannot be independently verified, all complaints received are recorded, rigorously investigated and reported, with feedback provided to the EPA and/or complainant as required. Upon receipt of a complaint AP checks the status of known sources of noise that may be noticeable offsite – these include but are not limited to: • Operation of the wood yard chipper – including times of operation, ensuring all doors on the chipper are closed, type of wood being chipped, knife changes and starting or stopping of the plant • Operation of the steam safety release valves – when there is an imbalance of steam production and use (e.g. in situations where there has been a sudden power loss resulting in a plant shut) the steam safety valves operate to release the steam and make the plant safe – this can result in a sudden, short term increase in noise The above information is combined with the prevailing weather conditions at the time the complaint was received. All of this information is compiled in order to determine if a cause for the complaint can be identified, on some occasions a specific cause is unable to be determined. Any new projects onsite are assessed for the potential to impact on noise levels, and abatement is included if necessary.</td>
</tr>
</tbody>
</table>

Figure 1.5 (below) shows the number of public complaints received for the last four years. It can be seen that the number of complaints is trending downwards.
Figure 1.5: Number of public complaints received