

COMMUNITY QUESTIONS TO SUEZ & OPAL

- 1) What alternatives to incinerating waste to generate steam has OPAL considered? For example:
- Seeking cheaper gas via the Port Kembla gas terminal which will start operation next year or
 - Using electricity to produce steam, instead of gas or
 - Using a mix of gas and electricity to produce steam

If not, why haven't these alternatives been investigated?

- 2) What baseline air quality monitoring will be done to establish the existing air quality? The community would expect a full suite of pollutants to be tested including heavy metals, acid gases and POPs, e.g. dioxins and furans as a minimum.

Note: At least a full year before the project starts, there must be soil/water/air sampling and body burden tests for a sample population of the host community. Hair, nail and blood samplings must be taken for heavy metals, POPs and other emissions so that these may be used as baseline. Monitoring and body burden tests must be done regularly (minimum, every 6 months).

- 3) 35,000 tpa of the waste to be burnt will come from OPAL. What does this consist of and how will plastics be removed from this material?
- 4) Given that a typical incinerator has one stack by-pass a month what happens during a stack by-pass event?
- 5) During a stack by-pass event one years' worth of pollutants can be released all at once. What pollutants are released and how will these be contained and monitored?
- 6) Typically, the best available technology in scrubbing and filtration equipment costs approx. 10 times the cost of the incinerator. How much is being spent on this incinerator's filtration system?
- 7) What type of scrubbing/filtration equipment is being proposed for this incinerator?
- 8) How does the filtration process work?
- 9) What happens when the filters get blocked? Is there a duplicate filtration system available to be brought on line? If not, what happens?
- 10) How will you prevent the emission of nanoparticles (2.5 micron and smaller) particles from the stack?
- 11) How exactly will you be "treating" the residual bottom and fly ash produced during incineration and what additives, e.g. activated carbon and other solid reagents are added to clean stack gases?
- 12) Do these solid wastes pass the gold-standard US EPA TCLP (Toxicity Characteristic Leaching Procedure) test after treatment? What is done with the highly toxic residuals after treatment? Can you pls supply NATA Laboratory test certificates for the TCLP testing carried out on the treated heavy and fly ash from your other incinerators.
- 13) Given that in Europe, POPs (persistent organic pollutants) are now being found in the environment, food chain and people from WtE plants (**see attached papers**) could you pls explain how you will be carrying out independently tested and verified, continuous monitoring of stack emissions for POPs e.g. dioxins, furans and brominated compounds using an AMESA continuous sampler?
- 14) Given that this facility would be classed as a Major Hazardous Facility, does SUEZ comply with all of their Environmental Protection Licence (EPL) requirements? Refer below.

EPL breaches at SUEZ facilities (the most recent in Victoria):

<https://herveybayonlinenews.com.au/hundreds-of-victorian-home-gardeners-angry-and-out-of-pocket-after-using-toxic-compost-from-major-recycler-suez/>

[https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200702-epa-fines-suez-spring-farm-\\$15000-for-unsafe-waste-storage](https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200702-epa-fines-suez-spring-farm-$15000-for-unsafe-waste-storage)

<https://www.heraldsun.com.au/leader/south-east/the-environment-protection-authority-victoria-fines-hampton-park-tip-operators-for-licence-breaches/news-story/de9612c9b9c953a1da75d5bb996fd7de>

<https://www.letsrecycle.com/news/latest-news/suez-fined-for-landfill-leachate-licence-breach/>

<https://www.letsrecycle.com/news/latest-news/sita-uk-fined-110000-landfill-permit-breach/>

Suez incinerators have also been involved in numerous safety incidents:

May 25, 2019: SUEZ Lunel Viel incineration plant, France: [Dioxin recorded in soil and chicken eggs within 5km of plant. Community, doctors and academics call for the plant to be shut down.](#)

July 23, 2018: SUEZ (and Novergie SA) Incinerator Azalys, Ile-de-France Yvelines, France. [Explosion at the plant causes 20 people to be evacuated.](#)

July 5, 2018: SUEZ incinerator Cornwall: [Fails to produce energy and is dogged with problems from day one.](#)

April 2015: SUEZ Montauban incinerator, France. [Suez prosecuted for accident and injury to employee - 7500 euros and 700 000 euros in damage to the plant.](#)

October 17, 2014: SUEZ Billingham incinerator UK: [Suez fined 230 000 pounds for accident that burnt worker.](#)

March 5, 2014: SUEZ Vedéne incinerator France: [Suez is prosecuted for an explosion at the plant that caused the evacuation of employees and community.](#)

November 12, 2013: SUEZ Rillieux-la-Pape incinerator (Lyon) France: [Fire and explosion shuts plant for days.](#)