

## THE NEW SEPP (AQM) – ACHIEVING COMPLIANCE

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### WHERE DO I START?

New industry development proposals must meet all requirements in the new State environment protection policy (Air Quality Management). Existing premises, however, will have a period of time to meet the requirements. This is because the policy will require industry to take a number of steps to ensure compliance. Information on the changes to the policy is available in EPA publication 843 *The New SEPP(AQM) – Information for all EPA Licence Holders*.

### ACTION PLAN

Companies are asked to review all their processes that lead to emissions to air, and develop an action plan to achieve compliance. The action plan may well be part of the existing environment improvement plan (EIP) for the premises. The action plan will include the tasks to be undertaken at the premises to achieve compliance with policy, and show timelines for the completion of the tasks.

Licence holders should prepare a draft action plan for submission to EPA Victoria during 2002. If you need more time, please discuss this with your EPA client manager. EPA Victoria will review your plan and provide feedback so you can make mutually agreed changes to achieve an (final) action plan that will lead to compliance with the policy by the appropriate dates.

### KEY DATES

Companies with issues related to greenhouse gas emissions and class 3 indicator pollutants must have an EPA Approved Action Plan in place by December 2003.

The air quality standards and goals specified in the National Environment Protection Measure (Ambient Air Quality) and in the State environment protection policy (Ambient Air Quality) must be met by 2008. To ensure this occurs a range of actions by industry, government and the community will have to be taken.

The provisions relating to class 1 indicator pollutants in the SEPP(AQM) must be complied with by 2006 to ensure that these national commitments are met.

### THE CONTINUOUS IMPROVEMENT FRAMEWORK

Your action plan must provide a framework to achieve continuous improvement of the company's environmental performance.

Here is an outline of the main elements of the continuous improvement framework (see attached diagram):

#### Step 1: Review Processes in the Context of the Wastes Hierarchy

Consider the inputs, outputs and processes at the premises in the context of the preferred wastes hierarchy (avoidance; re-use; recycling; recovery of

energy; treatment; containment; disposal – in order of most to least preferred).

### **Step 2: What is 'Best Practice' for the Industry?**

Review recent industry practices here and overseas. 'Best practice' encompasses eco-efficiency and should also consider the full life cycle of products and services, as well as greenhouse gas emission and energy consumption issues. If class 3 pollutants are emitted (highly hazardous pollutants), the degree of reduction must be to the 'Maximum Extent Achievable' (MEA) to minimise risk to human health from such emissions.

### **Step 3: Identify options to adopt Best Practice Process Change Options**

Develop a range of process change options that are consistent with the policy's preferred wastes management hierarchy and other principles and requirements. Consideration must be given to the cost-effectiveness of each option.

### **Step 4: Estimate Emission Reductions for Each Option**

Estimate the reduction in pollutant emission rates that can be achieved for each option.

### **Step 5: Model Air Dispersion and Resulting Local Air Quality Impacts**

Use estimated emission rates to predict the maximum concentration for each pollutant for each option in accordance with schedule C of the policy.

### **Step 6: Do Preferred Option(s) Comply with Policy?**

The preferred option(s) should satisfy the general policy principles as well as specific policy

requirements. Compare predicted maximum concentration for each pollutant with the relevant design criteria from schedule A of the policy as a guide to compliance. If best practice or MEA is applied and design criteria are met, beneficial uses are protected and compliance is achieved. A continuous improvement program in environmental management is expected and should be integrated into the business management systems. The historical trend to tighten standards will continue and, as such, opportunities to reduce impacts as far as economically and practically possible is a worthwhile investment to be prepared for this trend.

### **Step 6.1, 6.2 and 6.3**

A risk based assessment of impacts demonstrating protection of beneficial uses is an alternative way of achieving policy compliance. The risk assessment must be undertaken in consultation and with the approval of EPA Victoria. If the risk assessment indicates that there may be an adverse impact off-site, the licence holder will be required to return to Step 1 and review all processes to achieve further reduction in emissions.

### **Step 7: Adopt and Implement Preferred Option**

Outline the steps and timelines required to implement the preferred option(s).

### **REPEAT PROCESS CONTINUOUSLY**

After a period of time - typically one or two years - repeat the review process to take into account changes in best practice and other developments to ensure continuous improvement is achieved.

The Continuous Improvement Process

