

AkzoNobel Community Forum #3 15 July 2021

Independent Report of Outputs



Using this document

Kismet Forward was engaged to prepare an independent summary of what took place in a community consultation forum held on 15 July 2021. Significant effort has been made to accurately reflect the contribution of people who took part in this consultation. Discretion should be exercised in making decisions based on the data in this report.

However, the feedback by its nature is subjective and not always consistent. It cannot *necessarily* be construed to be an accurate reflection of the weight of broader community or stakeholder opinion. The report does not provide recommendations or opinions of the consultancy team. No formal statistical analysis or fact-checking of data has been undertaken.

No responsibility or liability can be taken for errors or omissions, or in respect of any use of or reliance upon this report by any third party.

Abbreviations used in this document

AN	AkzoNobel
EPHU	EPA Environmental Protection Health Unit
EPA	Environment Protection Authority Victoria
ETS	ETS Emissions (consultant)
KF	Kismet Forward (consultant)
RTO	Regenerative Thermal Oxidiser
SANPAG	Stop AkzoNobel Pollution Action Group
VOCs	Volatile Organic Compounds



Prepared by Jennifer Lilburn, Director, Kismet Forward (jen@kismetforward.com.au) and Kylie Cirak, Tiger Grace Consulting

Kismet Forward provides specialist advice and support in the areas of community engagement, facilitation, conflict management coaching, program logic, strategy, evaluation, training and project management.

Further information can be found at www.kismetforward.com.au

Table of Contents

Executive Summary	4
1. Introduction and Background	5
2. Methodology.....	5
2.1 Invitations and participation	6
2.2 This report	7
3. Who contributed feedback.....	8
4. What we heard.....	8
4.1 Odour and air emissions	8
4.2 Noise	16
4.3 Reporting and Compliance	18
4.4 Health	21
4.5 Other	24
4.6 Outstanding Questions from the Previous Forum	26
Appendix A: Community Forum Agenda	28

Executive Summary

AkzoNobel is a global paint manufacturer with a Sunshine North based facility that has been in operation for 65 years.

From January to June 2020, community complaints to the Environment Protection Authority Victoria (EPA) regarding odour and noise emitted from AkzoNobel Sunshine increased roughly four-fold. AkzoNobel began a concerted effort to better engage with the community through various methods, including a dedicated community website, distribution of fact sheets, and community forums.

On 15 July 2021, a third community forum was held to enable attendees to raise and discuss concerns and feedback and hear updates from AkzoNobel and EPA Victoria. 38 community members attended the online forum. All points and questions raised in the forum have been documented in this report.

Odour emissions are still of great concern to community members, especially the continued smell described by many as 'sickly sweet'. There is also concern about how odour is monitored, particularly the perceived flaws of the 'sniff test'. From a community perspective, the carbon filter installation has yet to reap any discernible improvements to odour. AkzoNobel contended that the (now) predominant odour is emitted offsite.

It emerged that the current focus has been on odours emitted by the resin plant and there was still work to do on odours emitted from other sections of the AkzoNobel site. AkzoNobel has committed to investigate all odours.

Impacts on human health from AkzoNobel's operations remain an ongoing concern to the local community. A representative from the EPA's Environmental Protection Health Unit team presented at the forum and reaffirmed that measured VOC results at site boundaries did not exceed health-based criteria for air quality and are not expected to have long-term health effects. Short exposures to odours detected by the human nose can lead to symptoms, but it is expected that symptoms will dissipate as the odour is reduced.

Community members raised their disappointment that, despite reporting their concerns to the EPA, AkzoNobel had done nothing to address them. AkzoNobel explained that they hadn't received any recent complaints. The EPA stated that in transitioning to its new laws and associated new systems, pollution reports were not being provided to AkzoNobel. The process is being rectified. The EPA noted that AkzoNobel also needs a monitoring program that can identify any offsite odours and respond to these immediately.

Community members questioned EPA's progress in regulation of AkzoNobel. The EPA reiterated its current Notices and potential enforcement measures. EPA staff noted that AkzoNobel has a duty and responsibility to understand, prevent, and monitor their risks under the new powers. The EPA again encouraged community members to contact AkzoNobel directly or the EPA.

AN has committed post-lockdown to reach out to nearby neighbours to pinpoint noise sources. There was positive feedback for AkzoNobel regarding their attention to complaints regarding noise generated by forklifts.

The online forum on 15 July was the third of several planned community engagement activities. Pending Covid-19 restrictions, future meetings will be held in person at a Sunshine venue.

1. Introduction and Background

AkzoNobel is a global paint manufacturer with a Sunshine North based facility that has been in operation for 65 years.

From January to June 2020, community complaints to the Environment Protection Authority Victoria (EPA) regarding odour and noise emitted from AkzoNobel Sunshine North increased approximately four-fold¹.

A local community group comprising 120+ members, Stop AkzoNobel Pollution Action Group (SANPAG), believes that the concerns regarding odour and noise date back at least ten years².

AkzoNobel wants to be a good neighbour and regain community confidence that its operations will not cause negative offsite impacts. It is committed to resolving the current noise and odour issues and sustaining effective community engagement and relationships³.

AkzoNobel is committed to running community engagement activities to facilitate open, constructive dialogue with concerned community members. Community forums were held online (due to Covid restrictions) on 4 March and 31 March 2021.

This report details the questions and points raised in a third online community forum held on 15 July 2021.

¹ Pers.comm, EPA Victoria, Western Metropolitan Region

² Pers.comm, SANPAG Committee

³ As per documents at <https://www.akzonobel.com/en/countries/Australia>

⁴ Golder Associates has been engaged in an ongoing capacity to undertake odour monitoring. Golder representative Cameron McNaughton was present at the forum to explain the monitoring process and recent results.

2. Methodology

An initial in-person community forum was planned for 10 June. Due to changing Covid-19 restrictions, an in-person forum looked unlikely. After consultation with community members, the forum was postponed until 15 July to have it face-to-face. Unfortunately, although an in-person forum was planned and advertised, more Covid-19 restrictions were introduced, including a five-day lockdown planned to start at midnight on the day of the forum. A face-to-face public forum was deemed too risky, and instead, a Zoom meeting community forum was held on Thursday 15 July 2021, 6.15–7.30pm. SANPAG committee members requested that the session be shorter than the previous 2-hour forums.

Attendees were required to RSVP online and were invited to raise questions for AkzoNobel or the EPA as part of the registration process. Community forum attendees could ask additional questions during the online meeting via both the chat function and verbally.

Representatives of AkzoNobel, Golder Associates⁴, ETS Emission Treatment Solutions⁵ and EPA were present at the community forum to provide information, answer questions and listen to feedback.

⁵ ETS Emission Treatment Systems was engaged to install the carbon filter. ETS representative Matthew Lakey was invited to the forum to answer community questions regarding the carbon filter.

Other attendees (not included in the participant count of 38) included:

- AkzoNobel: Peter Black, Site Manager; Raymond Jreige, Health Safety Environment and Security Manager; Phuong Anh, Acting Director of Communications, South East & South Asia, Australasia
- ETS Emission Treatment Solutions: Matthew Lakey, Managing Director
- Golder Associates: Cameron McNaughton, Principal Air Quality Consultant
- EPA Victoria: Stephen Lansdell, Western Metropolitan Regional Manager; Sam Sparks Senior Environment Protection Officer; Janine Dridan, Stakeholder Engagement Advisor; Jason Issa, Project Officer, Environmental Public Health Unit
- Forge Communications: Scott Thomson and Amy Watson
- Kismet Forward: Jen Lilburn and Sally Chandler-Ford, independent facilitators

The registration process revealed that

- Fourteen community participants heard about the forum by social media (likely to be via the SPAG Facebook Group)
- Eight people had received a leaflet in their letterbox
- Eight people knew about the forum because someone told them about it
- Seven people were notified as they are on the AkzoNobel mailing list and had received an email
- The EPA notified one person
- One person noted 'by other means' but did not specify

Participants were able to choose more than one response. Four people skipped the question about how they heard about the forum.

2.2 This report

The key output of the forum is this report documenting the questions and discussions that took place.

Attendees were required to RSVP online and were asked to list any questions for AkzoNobel or the EPA. These questions are indicated in this report by an asterisk *. Questions and comments made during the forum are not asterisked; all questions are numbered. Duplicated or very similar points have been consolidated, and points have been grouped under themes.

Slides prepared for the forum have been placed in the report where relevant. These include some slides that the presenter did not have time to show.

Responses from AkzoNobel (AN), EPA Victoria, EPA Environmental Protection Health Unit (EPHU), ETS Emission Treatment Solutions (ETS), Golder or the independent facilitator(KF) are indicated. All meeting responses were transcribed and sent to AkzoNobel and EPA staff to check for accuracy. Any additional information provided during this process has been indicated as such.

Comments by the Facilitator, for example, where further follow up is needed, are shown in *italics*.

3. Who contributed feedback

Fifty-one people, including 38 community members and thirteen others described above, attended the session.

At the start of the session, the community members were invited to participate in an online poll noting which 'main hat' they were wearing at the meeting. Participants were able to choose more than one category. Of the 26 attendees who participated in the poll:

- Fifteen indicated that they were a resident living within three kilometres of AkzoNobel Sunshine North
- Six were representatives of AkzoNobel or a consultant
- Six were a member of a community-based group
- Five were representatives of the EPA
- One attendee indicated that they were a community member living beyond 3 km of AkzoNobel Sunshine North

4. What we heard

4.1 Odour and air emissions

RTO

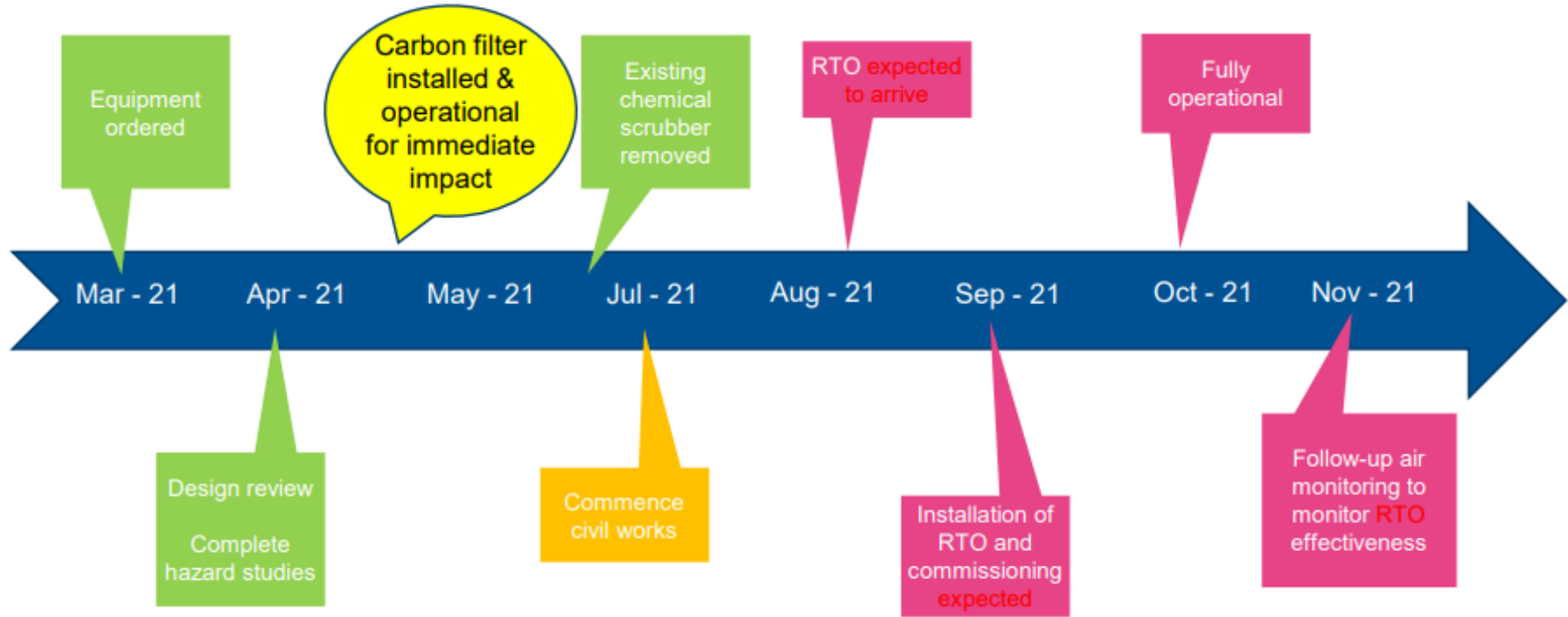
1. I wish to hear directly from the company that manufactured and installed the carbon filter as to its composition, how it works, its estimated efficacy, planned maintenance to the interim filter etc. I wish to hear from AkzoNobel how it's progressing with the so-called permanent carbon filter to be installed in October. Is this process on-track for delivery within the agreed timeframe?*
2. What is the timeline for the improvements? Is it still to be completed by October?/ What specific timeframe can you provide to update the issues? Who is installing the RTO, what is the current status of its procurement, and when is the estimated (installation)? Can you honestly say that you believe the RTO will resolve this issue?*
3. How quickly will the RTO be installed?

Post Forum

AN: The RTO will be fully operational from 22 October 2021.

Facilitator: *It is noted that Q1 refers to the 'permanent carbon filter'. I understand that the permanent solution, the Regenerative Thermal Oxidiser (RTO), is not a carbon filter.*

Regenerative Thermal Oxidiser (RTO) Update AkzoNobel



Tentative timelines

Figure 2: Timeline of 2021 activities to resolve odour issues

Odour since the installation of the carbon filter

4. What is the new burning smell coming from the AkzoNobel factory? This has been observed around Barwon Ave, Cary St, Gilmor Avenue over the last few weeks. Incredibly strong and acrid smell.*
5. Why has the carbon filter not resulted in significant changes to the odour that is produced?*
6. How will you manage the odour in the long run? Can you guarantee that you do not expose us to health hazards?*
7. Why there hasn't been a reduction in smell?*

Comments

- The carbon filter that's been put in hasn't resulted in any changes for a lot of us. We don't think it's working very well.

Forum

AN: We've seen a significant impact at the site, and to my knowledge, we've not had any formal complaints. I know there's been some talk about a burning acrid smell which is not something that we've been able to smell on the site. If you are smelling the same smell, please let us know.

Post Forum

AN: We smelled the described odour once onsite shortly after the carbon filter was installed. We have since been able to track it to an offsite, non-AkzoNobel source.

8. We've all been reporting to the EPA, and that takes a significant amount of time out of our day. You know this is happening. You're getting their reports. I think that we should be reporting directly to AN.

Forum

AN: We've had no reports from the EPA regarding odour since the carbon filter was installed.

9. Please explain why the scrubber was removed and if it will be replaced?

Forum

AN: The odours were coming from the scrubber, so it was clear it was not working effectively. We tried solutions to improve it and made some small changes, but obviously, it didn't have a significant impact. We have now installed the carbon filter, and the gases and anything odorous is going through the carbon filter. All of the ducting that comes off the processes, the reactors etc., has been upgraded and is now fed through the carbon filter. The RTO will essentially become the primary source of managing the air and the odours. The carbon filter is a good intermediate step.

Sniff test

10. You said you've seen a significant difference since the installation of the carbon filter. How are you measuring that difference?

Forum

AN: At the moment, it's really by walking around the site and not being able to smell the odour that was coming via the scrubber. The

next step for us is monitoring the carbon filter. There are sample points, one before the vapours enter the carbon filter and one at the exit. We can sample the change in the VOCs that are going through the carbon filter and the impact. We will also do an odour assessment which is planned to be undertaken by Golder this month.

11. How is AN doing a sniff test appropriate?

Forum

ETS: There are a few aspects to this. AN and all of the surrounding sites contribute to atmospheric odour. We are systematically going through each section of the plant and making sure that we're meeting the requirements of the EPA and AN's odour requirements for boundary limits. ETS was engaged to look at the resin plant. What tends to happen with odour is that you start to unmask or uncover other odours once you've treated those that the residents notice.

While the activated carbon filter hasn't yet been formally tested, the odour in the ductwork that was previously extracted to the wet scrubber is now captured much more effectively. This is because we've redesigned all the ductwork and we're moving a lot more air. We don't have the fugitive emissions, and we've now got it all coming from a single stack off the carbon filter.

Having those very discreet inlets and outlet points means that AN can now do very scientific, objective testing from a third party NATA laboratory perspective. The evidence coming forward is exactly what you need to be reassured that the odour is being removed.

The next step is for AN to tackle any other odours that are present. But our work on the resin plant isn't going to remove all odours

from the neighbourhood because other contributing odours are potentially coming from other plants and other parts of the AN site.

12. Jen's previous email asked residents to provide feedback regarding odour before and after the installation (of the carbon filter). Have you compiled this feedback? Have you followed up on resident feedback? If so, what have you done about their feedback and insights received?

Post Forum

AN: The only feedback received was from one community member, who raised a concern on behalf of other residents regarding the presence of a burning smell that has been evident since the carbon filter's installation. We responded at the time as follows:

The filter itself is not a source of new odours. All of the odour-emitting stacks within the plant are now diverting through it*. We will be undertaking sampling and testing of the incoming vs. outgoing emissions to verify it is functioning as it should. The types of smells mentioned (burning smell and burnt plastic trash) are not likely to be generated by our operations and could be from another source, e.g. local landfill. Nonetheless, we would encourage anyone experiencing these smells to let AkzoNobel know when and where they occur in relation to the site. This way, the team can make a record and investigate.

* For the record, the response should have been 'all of the odour-emitting stacks within the resin plant are now diverting through it'.

13. Residents have also smelled a plethora of new odours. These emerged at precisely the same time as the filter. Why would this be the case? Can AN confirm they haven't started new product lines or other processes since installing the filter?

Forum

There have been no new product lines or processes since the filter was installed.

14. Why are residents continuing to observe and report to the EPA what I would describe as the classic AN smell? *NB Many forum attendees noted that it was a sickly sweet chemical odour.*

Forum

ETS: In terms of what you describe as the classic AN smell, I noted two smells on my first visit to the site: a solvent or paint-type smell and a glycol-type smell from the resin plant, which is what we're tackling. I can step back and be objective about the types of odours that I smell and their effects on me when I go inside. I found that the resin plant glycol-type odour gave me a very scratchy feeling in the throat, whereas the paint plant odour gave me an instant headache. So that's how I'm trying to differentiate between the two parts of the site. It is very difficult because odour is subjective, and it affects people in different ways.

EPA: <https://www.epa.vic.gov.au/report-pollution/report-odour/describe-odour> This is a link to our odour wheel if it helps people report and describe the odours they experience.

Comments

- When we have called AN, we've been told that they may have already just become used to the smell. I don't think that's a good indicator. There's a significant difference when residents have reported on a regular basis to the EPA about the smells after the installation of the carbon filter. I understand your next steps are to get sample points, and you have done some VOC monitoring. Yet when we ask about what is causing that odour, or specifically what compound it is, we haven't got any accurate answer. Or, for compounds that come out of this odour, you don't have a health measurement of the baseline for what is safe and what isn't. A sniff test from your perspective is not going to cut it.
- I experienced one odour of overpowering chemicals, but I wouldn't say it necessarily smells exactly like a paint smell. These smells probably combine to create a very unpleasant experience. The smell has been known to come inside my house under the cracks. I have shutters on my windows. I sleep with my windows closed because of the smell.
- Sometimes it smells like a mild bleachy smell; other days, there is the "after taste" of paint. It is extremely chemically, and it sticks on your tongue and throat.
- I'm metres away from the factory. I've lived here for many years, as have most of the residents on my street. We are immune to the paint smell, and we don't smell it. I would assume your staff would be similar. I would love to see hard, tangible results of what volatile smells are being picked up and detected, not just sniff tests.

Carbon Filter Maintenance and Monitoring

15. Can you tell us about the process of maintaining the filter and how regularly the carbon is changed? I'm concerned about the prospect for emissions at that maintenance point, or if the maintenance isn't occurring in the manner it should, or perhaps the filter is not working as well as it should. What's happening on the level of maintenance, and what kind of assurances can you provide that are happening effectively on time to minimise the emission of VOCs?

Forum

ETS: The carbon filter has been designed with a very deep bed and a very long residence time, which indicates the amount of time the gases spend in the bed for this type of application. We've done that because we're trying to achieve greater than six months of carbon life. There's probably three layers of monitoring. The first layer of monitoring is AN staff doing the basic sniff test to see if they can pick anything up coming off the outlet of the RTO.

16. Is this interim filter functioning as good as it can function? Can it be adjusted to reduce the solvent emissions further, or is this as good as it gets?

ETS: The filter works with thick layers of activated carbon. Activated carbon is a very porous product that absorbs odorous molecules. The carbon needs to be replaced when it becomes saturated. If we reduce the volume of VOCs coming onto the carbon, you can make the carbon last longer. But the air needs to flow through the carbon long enough for the carbon can do its job. AN is aware that if the activated carbon becomes saturated, then immediate replacement is required. Once the performance testing is carried out on the carbon filter, and it's proven scientifically and objectively that the

carbon filter is removing the odour, then the only other improvement that we can make is adjusting the ductwork to ensure it is doing the best job possible of channelling airflow to and through the filter.

KF: As far as you're aware, is it doing the job that it's been designed for?

ETS: Yes.

Odours emitting from sources other than resin plant

17. You've alluded to two smells. Can you clarify if those two sources of emissions are being dealt with through this carbon filter?

18. Why aren't both smells being filtered through the carbon filters?

19. Have you been contracted by AN to mitigate those other odours you described that are not being captured by the carbon filter?

Forum

KF: I understood that all of the possible odour sources were being directed going through the filter, and we learned tonight that it isn't. Could you comment on that, please?

ETS: There are two parts to the site: the resin plant and the paint plant. The resin plant uses a different type of solvent than the paint plant, and therefore, they have different characteristic odours. At this stage, we've been engaged only to look at the resin plant. However, we are in continuous discussions with AN about the next step for the paint plant.

AN: The focus has always been on the resin plant and the sweet odour coming from the resin plant. It has always been our focus to address that particular odour source and associated VOCs. The source of this odour has been confirmed from EPA visits to the site,

the extensive independent study by Golder, and most importantly, the reports received from the local community. Further assessments are also being completed on all emission points from the site in line with EPA Notice requirements.

Post Forum

AN: There are other odours that aren't necessarily coming from the AkzoNobel site, for example, the acrid burning smell, which we understand the EPA is investigating. We are getting odour sampling done by Golder to identify other sources. Golder has also completed an inventory of all emission points, which is helping us develop a plan around testing. If we need to do something further to address odour issues, we will do so.

To date, we have been concentrating on the odours from the resin plant as this was the focus of the EPA notice and community concerns.

Our response to the Notice from EPA regarding VOCs and odours has been submitted. We have suggested methods for air monitoring, and we will wait for feedback from the EPA. In the interim, we will continue our monitoring.

20. When can we expect some more scientifically accurate testing to take place that will tell us what kind of harm we're exposing ourselves to when we can observe this odour? We're breathing in chemicals, and they're giving us health effects.

Forum

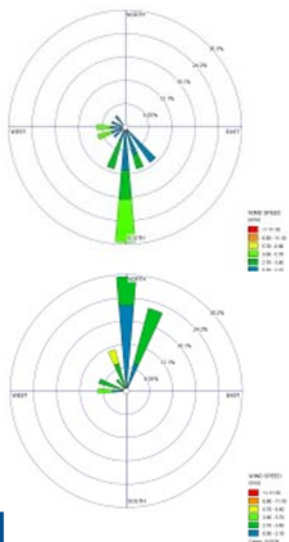
Golder: As ETS has discussed, there's effectively two types of odours that we're talking about here: those associated with VOCs in general, and then the sickly sweet odour that we associate with the glycol source from the resin plant and the use of the activated

carbon. We have a boundary fence line monitoring program for VOCs. We have those results in the AN presentation*. My primary concern was the health effects of the compounds that we can test and that have established health-based air quality criteria. We've measured for several months, and we have found that those concentrations are all below the health standards. It is true that odour can induce a physiological response, and that's the purpose of the EPA guidelines around not emitting offensive odours.

Unfortunately, not all organic compounds have health-based criteria. This is not an issue with the EPA, Golder or AN. It is because these compounds have not been assessed internationally to determine their potential health effects. Some of the more exotic compounds that are in use in AN fall into that category.

The activated carbon filter is working on the odour problem related to the glycol, for which there is no standard. We are testing for some of the compounds that may be of concern, such as toluene and xylenes, and those levels as monitored at the boundary are all below the health-based criteria.

**Note by the facilitator: The monitoring results were included in the AkzoNobel presentation. Unfortunately, we ran out of time during the forum to complete the AkzoNobel presentation. It was circulated to all forum attendees (and others on the Community Contact List) the following day.*



04 May 2021

- Winds directly from the south at 2.0 m/s
- Ethylbenzene (15 $\mu\text{g}/\text{m}^3$) and total xylene (110 $\mu\text{g}/\text{m}^3$) detections at north location only
- No detections at any other locations

10 May 2021

- Winds directly from the north at 1.9 m/s
- Ethylbenzene (16 $\mu\text{g}/\text{m}^3$) and total xylene (140 $\mu\text{g}/\text{m}^3$) detections at South location only
- No detections at any other locations
- Since March 2021, detections of ethylbenzene and total xylenes are well below the new 24 -hour “Air Quality Assessment Criteria” of 21,712 $\mu\text{g}/\text{m}^3$ and 8,685 $\mu\text{g}/\text{m}^3$.**

Community Forum #3 – July 15

Other air emissions questions

21. How are EPA and Akzo measuring VOCs?

From Community Forum Report March 2021

AN: AkzoNobel is undertaking rigorous monitoring, according to a monitoring plan approved by the EPA. The first stage of monitoring began on 5 February 2021. This air monitoring is designed to assess how many VOCs are being emitted from the site. New monitoring protocols will be established when the RTO is commissioned to ensure it is working as expected. All monitoring results will be shared with the local community in line with EPA reporting requirements. Pending EPA approval, the Regenerative Thermal Oxidiser will be installed by October 2021. AkzoNobel will continue to monitor and address emissions and work with the local community.

22. This is my first meeting, therefore I don't know what has taken place regarding the toxic smell that I am more concerned about.

Email Update 16 July 2021

KF: I have attached Fact Sheets about the odour and noise issues for your information. This is the third community meeting (the previous two were online). Each meeting was recorded, and a report of discussions was prepared. (see <https://www.akzonobel.com/en/countries/Australia>). A recording and report from Meeting 3 will also be made available.

4.2 Noise

23. What were the results of the March noise testing? These haven't been fed back to the public.

Note by the facilitator: This question was addressed in the AkzoNobel presentation. It was circulated to all forum attendees (and others on the Community Contact List) the following day. Unfortunately, we ran out of time during the forum to complete the AkzoNobel presentation.

Noise Review

- 7 Night-time operation of milling equipment ceased in Dec 2020 in order to comply with allowable noise limits
- 7 Study found that we are compliant at sensitive periods based on indicative night-time results.
- 7 Onsite 24hr noise monitoring for 4-week period completed in March.
- 7 Noise model of the site was developed which will assist in the selection of noise treatment options.



AkzoNobel

Focused Improvement

- Time switches installed to all dust collectors to switch off pulsing units from 7.00am-7.00pm
- Upgrade to powder mill motor delayed until August
- All new equipment to be assessed for noise impact
- Other smaller treatments to reduce the cumulative noise impact are being undertaken.
- Comments have been received regarding forklift noise. Lower frequency beepers and other methods are being explored.
- Suggestion to build a wall to prevent noise is being considered. Engineering specifications and council approval need to be considered.

Community Forum #3 – July 15

24. Why are fans still running after 7pm? Residents have heard the fans running at 1am. What are you doing to resolve the issue of noise during the night? Starting at generally 10pm, and then continuing until 5 or 6am. Why do the fans need to be going at 4.30am?*

25. Why are residents still hearing the noise at night?

26. We are consistently hearing the noise ALL day, it is obnoxious, and I can hear that from my house 1km away. This is unacceptably loud. What is the solution in the long run?

27. We have complained to the EPA about the noise of the metal drums being moved and the doors being constantly opened and closed. There are always loud bangs and thuds happening. This sound has never been addressed by EPA or AN, even though this is the cause of many of our complaints between 9pm and 5am. We have noticed recently you've changed your forklifts which appear to be electric or gas. But we still notice the banging and clanging. It sounds like our houses are being broken into at all hours of the night. The noise is by the forklifts driving, but it's not the forklifts themselves. Every EPA report that I've lodged has been about this.

Forum

AN: Thanks for clarifying the forklift noise because we were focused on the forklifts (reversing beepers etc.), rather than the activities undertaken. It takes time to put some of these things in place. Hopefully, you can see we're moving forward and that we take everything you say very seriously. If you give us the feedback, when it's happening, we can go and investigate for ourselves.

Post Forum

AN: Post-lockdown, we will reach out to neighbours in close proximity to try and pinpoint some noise sources. Typically after receiving community complaints, EPA comes onsite and determines the equipment making the noise. AN will focus on those because of the Notices served and also via surveys. Noises like a slamming door may not be looked at even if there is an easy fix because AN is focussed on EPA, mandated noise sources. AN needs the community to contact us directly so we can resolve it quickly.

Facilitator: As reported in Email Update #16, AN staff met with some nearby residents to further discuss these issues.

28. What is the status of updating the exhaust fans?*

Post Forum

AN: There will be a new fan for Mill No 1: The stack will be increased in height; the noise dissipates as it travels up the stack. This will have a big impact on the high-frequency noise. All fans in the other mills will be replaced and moved to ground level to reduce resonance within the building by approximately the end of September.

29. The fan noise ramps up particularly around 4pm – 7pm, which corresponds to the times when the odour can be particularly noticeable. I recall on one Sunday morning, the fan turbine was extremely loud, and many residents banded together to report. How is AkzoNobel permitted to operate the fan until 7pm?

Post Forum

EPA: EPA does not have a legal basis for stipulating operating hours at a premises. In the case of noise, we set standards or levels of noise (in decibels) that are appropriate at different times of the day

and night. If businesses are above this prescribed limit, we can take compliance and enforcement action as we have done with this issue.

However, as part of their ongoing prevention and management of noise and odour, EPA expects AN to consider the times of day and intensity of their operations together with their monitoring, maintenance and management of equipment onsite to take any practicable measures to prevent impacts on local residents.

30. Are there sound barrier requirements? I have noticed that the sound level decibels were above the mandated level on previous EPA reports, yet these levels haven't improved. We haven't received any reports since that the decibel level has dropped under the mandated levels.

Post Forum

EPA: There are no specific requirements for types of controls (in this instance, sound barriers), just that noise is controlled to be below prescribed limits. EPA issues a Pollution Abatement Notice for AkzoNobel to reduce their noise levels, and we are currently investigating potential non-compliance with this Notice. We will communicate the results of this investigation to the community when we can.

As explained above, the EPA expects AN to consider all practicable measures to prevent noise, potentially involving sound barriers.

Comments

- We wanted to thank you for changing the forklifts because we have noticed that there's minimal motors running and things like that. So that's been an improvement.

- Now that we are in lockdown for the next 5 days, more impacts, frustrations

4.3 Reporting and Compliance

I trust the EPA can explain why AN has not received any data on the numerous reports submitted since the carbon filter has been installed?

Post forum

EPA: In transitioning to our new laws and associated new systems, the EPA has identified that pollution reports were not provided to AkzoNobel. We're rectifying the process and working with AkzoNobel to ensure they have an appropriate process to receive and respond to these. EPA also encourages people to report directly to AkzoNobel on 03 9313 4555, where they feel comfortable. AkzoNobel also needs a monitoring program that can identify any offsite odours and respond to these immediately.

31. How far are the smells or sounds allowed to travel beyond the boundary of the premises?

Forum

EPA: AN has a condition as part of their EPA license that there must be no offensive odours beyond the boundary of their premises. There can be VOCs over the boundary within the human health limits and EPA discharge limits, but there must be no offensive odours leaving the premises.

32. If we are still experiencing offensive odour and noise, what will you be doing about this as our environmental regulator? And how would you be treating breaches? You mentioned something about the sanction of non-compliance for noise for AN, but how about odour?

Forum

EPA: The long-term fix is the Regenerative Thermal Oxidiser (RTO), which our odour experts say is sufficient and best practice. I know there are concerns about the carbon filter and people still being able to smell an odour, and there have been various complaints about odours with different characteristics. We have started an investigation and so far have carried out two odour surveys through that Sunshine North area. As Covid restrictions ease, we will continue these investigations and keep the community informed of any outcomes.

33. If they are still in breach of your odour limits, what are your new powers?

Forum

EPA: We have to give AN the appropriate amount of time to install the solution. If we didn't, then that Notice would potentially not be legally enforceable. If AN does not have the RTO installed by the October due date, we will consider appropriate enforcement action guided by our Compliance and Enforcement Policy.

EPA is also using new powers through ongoing odour surveillance and compliance approaches, which include much more focus on reasonable controls to prevent odours and less need for EPA to prove odour impacts offsite.

34. When we complain about any sort of smell or noise, how does the EPA react in real time about this complaint? Do they send anyone to test, for example the noise levels?

Forum

EPA: Every report the EPA gets is triaged so we can carefully consider the type, location and scale of risk or harm to human health and the environment and target our efforts most effectively. While we often conduct inspections and conduct noise monitoring to inform regulatory notices and recent enforcement actions, this will not always add value.

Our Compliance and Enforcement policy

(<https://www.epa.vic.gov.au/about-epa/publications/1798-2>) helps explain our risk-based and escalating approach. For example, we had the first noise reports about AN at the end of last year. Given the cluster of reports, we investigated the source of the noise. This included putting a noise logger at one of the complainant's houses and speaking to other complainants. From there, we issued a notice to remedy or fix the issue, and after we identified that the noise was still above prescribed limits, we have recently issued a fine or infringement.

Under the new prevention-focused laws, AkzoNobel has a duty and responsibility to understand, prevent, and monitor their risks (i.e. noise and odour). EPA will no longer need to undertake as much monitoring to prove breaches of levels as the only basis to require action. Where there are reasonably practicable measures available to prevent risks or impacts, these ought to be in place regardless of the particular levels.

35. The testing site you used in March is in front of the brick wall on Barwon Avenue, which provides a major sound barrier to the true noise of the forklifts and their maneuvering. You can put a noise reader in my front yard.

Forum

EPA: The noise levels we recorded were over the prescribed limits, which is why we issued the Notice. (The Notice is available online.) We put it at that location as community members had recommended that person's house, and we were happy to be guided by that. We do not currently need to undertake any further monitoring. We will work with the community to identify appropriate locations if we do.

36. You have issued a new Notice recently under the new Act provisions. How does that intersect with the odour control and the October timeline? Are they two different things?

Post Forum

The notice in question was served under the 1970 Act rather than the 2017 Act and required AkzoNobel to improve their monitoring program for odour and VOC discharges to air. Legally speaking, this required them to comply with our expectations under the 1970 Act. However, when serving the Notice, we provided significant compliance advice on the type of monitoring we would expect under the 2017 Act. EPA will assess this monitoring program if it is not up to that standard. We will issue further remedial notices to reflect their increased obligations (under the new 2017 Act).

We have asked AkzoNobel to be proactive and implement this monitoring because it would complement the installation of the RTO. While the installation of the RTO should stop the generation of

the “classic sweet/sticky” AkzoNobel odour, the monitoring program will enable them to detect any potential new sources of odour and prevent any future problems, including before an EPA Notice is issued.

37. What are the measures if the October solution doesn't deliver what we need?

Forum

EPA: Our compliance enforcement policy outlines the implications of non-compliance. It's just been recently updated to reflect the new legislation. For minor non-compliance, like a reporting breach, there would be an official warning, and it can go right up to prosecution or loss of license. We look at the culpability of the business. If it's a once-off non-compliance, that is assessed differently than if a business has continually not complied with EPA notices. The other axis on that decision-making model considers the effects on human health and the environment. If it's a maintenance issue or reporting breach with minimal impact, then that will be assessed as a lower sanction than if it's causing some huge environmental disaster. If a non-compliance is to occur, we pass it on to our Major Investigations Unit. They decide what sanction is appropriate, ensuring consistency statewide.

Link to compliance and enforcement policy:

<https://www.epa.vic.gov.au/about-epa/publications/1798-2>

38. Can you summarise all the improvements that AN need to abide by?

Post Forum

EPA: EPA currently has three active remedial notices served on AkzoNobel. The first is to install the odour control (RTO), the second

is to reduce noise levels at the premises, and the third is to devise and implement a new monitoring program to enable them to demonstrate compliance with the odour and air discharge conditions of their EPA License. As of 1 July 2021, AkzoNobel is also subject to the General Environmental Duty, which means they now have to minimise their risks of harm to human health and the environment, so far as reasonably practicable.

39. So a lot of talk about new powers, BUT what is specifically going to be done? Who is enforcing the sound and smell requirements? EPA says it's the local council, local says its EPA... and so forth.../ Who deals with non-compliance, and actions it, as we have been informed by yourself and other EPA members that it is the Brimbank Council's concern to enforce.

Post Forum

EPA: Although both Council and EPA have different statutory provisions, as an EPA Licensed premises, EPA is the lead regulator for environmental issues for AkzoNobel. That said, we work closely with Brimbank Council on large scale issues such as this. As described above, EPA is regularly checking compliance with the current Notices, their licence, the new laws, and we are taking enforcement where required.

40. Do these enforcement options include stop works orders? If so, what is the threshold for that?

Post Forum

EPA: EPA can either temporarily or permanently revoke an EPA License. To do this, we would apply our Compliance and Enforcement Policy and assess the business's culpability and the

consequence of the issue. We would also need to have the scientific and legal basis needed to make that decision.

As described above, in developing a best practice monitoring and management plan, if AN cannot prevent the issues in other ways, EPA expects AN to consider changes to business practices and times as needed.

41. We report and report and see no action. How can you expect people to be happy with this?

Post Forum

EPA: We understand that the community may be frustrated at the length of time to fix these issues. Unfortunately, the fix needed to control the odour is of a large scale, and we need to give AkzoNobel enough time to install the control because if we didn't, we might not be able to legally enforce the Clean Up Notice. As we explained in the first community forum, your pollution reports have been invaluable to help us analyse, prioritise and investigate these issues thoroughly. This has led to regular inspections, monitoring, multiple notices and enforcement actions, including a warning and a fine.

Comments

- The point here is the community is saying that the EPA is not actively investigating complaints thoroughly. This does not meet our expectations.
- EPA needs to send someone at nighttime on a regular basis to check all the noises because we can't sleep at nighttime with all these noises running.

4.4 Health

From the presentation at the Forum by Jason Issa, EPA Environmental Health Unit

Environmental Public Health

• Odour

- Health-based criteria values are guidance levels set by expert groups. Combined with estimates of exposure, they can be used by assessors to determine the risk to human health, and to consider whether further investigation, assessment, and/or remediation is required.
- Odours for VOCs can be detected by the human nose at much lower levels than values relevant to health-based criteria values.
- Three main odour causing VOCs that have been identified and investigated were: toluene, xylenes & ethylbenzene.
- Measured VOC results at site boundaries did not exceed health-based criteria for air quality. Indicating that VOC levels present are not expected to have long-term health affects.
- Short exposures to odours detected by the human nose below VOC health criteria are not expected to have long-term health affects, but can in some cases lead to symptoms, e.g. headaches, nausea and vomiting.
- There is a remedial notice currently in place focused on elimination of odour sources. It is expected with the reduction of odour impacts will be accompanied by dissipation of symptoms.

• Noise

- Even at lower levels, noise can cause adverse effects because it is annoying or a nuisance and can awaken a psychological disturbance impacting health & wellbeing.
- Noise impact assessment is related to background noise level, source noise level, frequency and duration.
- We are aware that this facility is a 24hr operation and have investigated noise impacts relative to the operations at the facility
- Noise monitoring has been undertaken and compliance with noise standards investigated as discussed previously, our Applied Sciences division has been working with our regional staff to guide remedial notices.

42. How many local residents have had cancer from living in a 1 km radius?*

Post Forum

EPHU: EPA has not been made aware of any higher than Australian average cancer cases within a 1 km radius of the site.

Statistics and trends of cancer cases can be obtained from the Victorian Cancer Council (www.cancervic.org.au), while suspected cancer clusters can be reported to the Victorian Department of Health (<https://www2.health.vic.gov.au/public-health/environmental-health/environmental-health-in-the-community/clusters-of-noninfectious-disease>).

43. If the levels monitored are 'so called' kept to a safe standard, should residents over a kilometre away smell a strong sense of odour?*

Post Forum

EPHU: Odours of the main volatile organic compounds (VOCs) (toluene, xylenes and ethylbenzene) thought to be released from the AkzoNobel site are detected by the human nose at levels much lower than health-based criteria. It can be difficult to confirm whether odours detected 1 km away are from the site. Such odours may also be from other sources, e.g. other industries, petrol stations.

44. Are there validated reports on the effects this poison is having on the community?*

Post Forum

EPHU: EPA is not aware of such reports or any poison. Monitoring results indicate that levels of VOCs detected beyond the site

boundary are less than health-based criteria, and therefore unlikely to cause long-term health effects. At these low risk levels, odour can sometimes cause short-term physiological effects and psychological impacts related to amenity and personal wellbeing.

45. My doctor advises me that smelling these odours long term can cause you to lose your smell. This is well documented in peer-reviewed research. Is becoming immune to the smell indicative of olfactory damage?

Post Forum

EPHU: This is a question best answered by your doctor. Based on the Victorian Department of Health's factsheet 'Anosmia - loss of smell' (viewed 20 July 2021), olfactory neurons can recover or regenerate after injury

(<https://www.betAnosmiaterhealth.vic.gov.au/health/conditionsand-treatments/anosmia-loss-of-smell#bhc-content>).

46. Is there any chance the factory can be moved?

Post Forum from Community Forum Report # 2.

AN: AkzoNobel plans to remain part of the Sunshine community in the future. We are looking to invest further into processes and facilities and also into the appearance of the site. We want to continue to be a part of the community and improve our social licence to operate.

Comments

Asthma and respiratory concerns

- I have called EPA to complain about the acrid smell over the last 20 years and can still smell this strong paint smell. I am concerned about my health and wellbeing and the effects these

toxins have on my children, who both suffer from asthma. I find it alarming that I have been diagnosed with asthma recently by a lung specialist.

- I have also recently been diagnosed with asthma, as has my partner.
- I am asthmatic, and the smell/odour/chemicals trigger my asthma.
- Short term effects, unless you live next door and have nowhere to go to escape?!
- Cannot ignore the health impacts - breathing, respiratory, and in addition with a new stronger strain of Covid, extremely alarming and serious concern!
- Impact on lungs – breathing

Mental Health

- I consider myself a healthy individual but suffer significantly from the noise and odour. Physical and mental. Shortness of breath, burning on the tongue, nose and throat, headaches, blurry vision, distraction (from the high pitched whirring of the fan). Over the very long lockdown we experienced, it really affected my mental health as I couldn't go outside and couldn't stay inside – we literally couldn't escape. Health is not just physical. Please acknowledge this.
- Health and wellbeing and increased impacts on mental health is a very high concern, more so now with these continuous lockdowns.
- My health has been affected almost every single day by this odour and noise pollution since I moved to Sunshine North two years ago. I have headaches, burning nose, eyes throat,

coughing, dizziness. If I am close to the factory going to Stony Creek, or walking my dog, I can quickly become overcome by the smell. This has had a massive impact on my mental health as well as my physical wellbeing. I am fearful of taking my baby and 3 year old outdoors.

Loss of sleep

- We don't get any sleep at night from the noise. I have been staying elsewhere recently, just so I can get some sleep!
- Another neighbour of mine sleeps at her sister's house!

Forum in response to comments

EPA: I'd like to acknowledge the impacts people have highlighted. This is why we're focused on requiring AN to get these issues fixed and continually identify and manage any changing risks and issues. If you do feel unwell or distressed, please take care and

-call NURSE ON CALL on 1300 60 60 24

-visit a doctor.

-visit Head to Health online to find digital mental health resources from trusted service providers, including

- Lifeline 13 11 14

-Beyond Blue 1300 22 4636 -speak to someone at the Translating and Interpreting Service (TIS National) on 131 450 and ask them to call EPA Victoria on 1300 372 842

-contact us through the National Relay Service if you have a hearing or speech impairment.

Comments

- Nurse on call will refer you to another service or a mental health plan.

- Seriously, we've sought health advice; we've been told to move away from the source. We cannot do this as this is our home! How about the EPA take some action, so we aren't being exposed to all of this. Talk about handballing.
- Acknowledging the impacts is one thing. Enforcing is another. We can call lifeline or beyond blue until we are black in the face. At the end of the day, the only thing that will solve this is to stop the pollution.
- My doctor has no power to stop AkzoNobel from pollution, and they can't help me with my exposure to the pollution given I live here.
- It doesn't speak to our concern if we're still getting very physical symptoms and doctors advising us to stay away.

4.5 Other

Issues with the letterbox drop

47. Why did residents in Avondale Heights receive the flyers but locals who are affected daily did not? You should have ensured that everyone got the flyers. That's not good enough.

Comments

- Concern with the letterbox drop for this meeting. Nobody in Sunshine North and Barwon Avenue received the flyer for this meeting. Only 8% of people said they're coming because they received the flyer - everybody else got the invitation through SANPAG on Facebook, the Brimbank page, or our local community page. If you want genuine consultation, you need a proper letterbox drop.
- There aren't many of us on the street who have a 'no junk mail' sign. We all found out about it via word of mouth. Not one of us received the pamphlet.
- A resident in Sunshine West who has a BIG "No Junk Mail" sticker DID receive the flyer. So this is not an excuse at all.
- Those closest to the factory didn't get anything, including myself.
- Facebook isn't used by everyone – need broader reach
- Sounds like we need a new distribution company
- We don't even get a local paper anymore – can't advertise there.

Post Forum

KF: AN was very keen to let as many people know about the forum as possible. We used several ways of reaching community members – please refer to the [Methodology](#) section.

For those who could not attend online

48. Is there going to be another community meeting at a later date for those that couldn't attend tonight or for further thoughts and concerns?

Post forum

KF: It was very disappointing that we could not meet in person due to the evolving Covid situation. All who had said they would attend the forum were either telephoned or emailed about the decision to cancel the face-to-face component of the meeting. Nine people who had said that they would attend the forum in person did not turn up online; they were contacted by email or voicemail after the meeting, with an invitation to contact Jen if they needed further information. Two responded with questions that have since been answered. The next community forum is planned to follow the Mill No 1 Fan installation in August (date to be confirmed).

In addition, the AN and EPA presentations were emailed to all on the Community Contact List and forum participants, with an invitation to submit further questions and concerns for inclusion in this report.

Length of forum

49. If you are aware that there are going to be a lot of questions and comments from the general public, why is more time not allowed in these forums?

Post Forum

KF: The first two forums ran for two hours. Some SANPAG members requested that the meetings be shortened to one hour, as the longer meetings are an impost on those with young families. A compromise of 75 minutes was reached so that AkzoNobel and EPA

could have 30 minutes each to discuss progress. We appreciate SANPAG's advice on engaging with this community most effectively and hope to work with the committee again in planning for the next meeting. Feedback is welcome by any participant in the meantime.

Contacting AkzoNobel

50. Are you open to us emailing you?

Forum

AN: Community members are invited to contact AkzoNobel on 93134555 or reception.sun@akzonobel.com regarding odour or noise concerns.

Good Neighbour

51. How is AN specifically trying to be a 'good neighbour' when people still hear the fans every day (before 7am) and when the odour is still affecting people's health?*

AN: Noisy equipment is being turned off at night and not turned on until after 7am. This will continue until effective engineering controls are installed in the long term.

Post Forum

AN: Based on the information provided at the last forum, we will be inviting SANPAG representatives to the site to help us pinpoint the sources of disruptive noises so that we can find solutions.

AkzoNobel Maintenance Budget

52. When will we be provided with an update about how much of AN's budget is being spent on improvements and maintenance of their equipment?

Provided in email update 15 July 2021:

AkzoNobel has previously stated:

We do not report separately on investments in amenity as it is an integrated component of our operating costs. But we are continuously making investments in maintenance, site and equipment upgrades and other ongoing improvements. Our response to the community's current noise and odour concerns includes the purchase and installation of the carbon filter and (upon its arrival) the RTO, replacement of all fans in the 3 mills, as well as consulting, civil engineering, and other services involved in these upgrades. The total investment is well into the millions.

We are not limiting ourselves with budget restrictions as we are doing all we can as quickly as possible to address the community's feedback. Over the years, we have also invested in a range of programs to support the community where we live and work. We want to be a good neighbour.

KF: AkzoNobel representatives have advised that they have answered the question to the extent that they can.

Invitation from SANPAG

Forum

SANPAG invited interested community members to contact them directly.

4.6 Outstanding Questions from the Previous Forum

The following questions were not completely answered in the reports from previous community forums.

Forum #2 Report Q13: Will all fumes be routed through the RTO?

AN: All odour sources from the resin plant will be routed through the RTO, which the EPA has advised is the primary odour source.

Forum #2 Report Q42 & 43: What do you do with community reports?

AN: The details are passed onto the Environmental Health and Safety Manager (Raymond Jreige) and the Site Manager (Peter Black). Receipt of the report is acknowledged, and they investigate internally to see if there was an unusual or significant event that may have contributed to or caused the issue. They keep details of the incident on an Issues Log to help identify trends.

Forum #1 Report Q31: When will the noise be remediated, and what can we expect when complete? (e.g. no noise at all, reduction in that high pitched frequency, etc.)*

AN: A new fan for Mill No 1 has been ordered and will be installed by the end of July (now August). The stack will be increased in height; the noise dissipates as it travels up the stack. This will have a big impact on the high-frequency noise. All fans in the 3 mills will be replaced and moved to ground level (to reduce resonance within the building) by approx the end of September. All dust collectors, which pulse, are now switched off 7pm-7am. Over 100 different

noise sources are also being addressed. We are working on the fixes that will make the biggest difference.

Forum #1 Report Q85: What % of their revenue made from manufacturing at Sunshine has been spent on meeting amenity requirements for their license to operate at the plant? Historically as well as recently.

AN: Budgets for these sorts of investments vary year over year and are influenced by maintenance and other needs. We are making substantial investments in addressing the community's concerns about noise and odour, including costs of consulting services, solution designs, construction and site preparation, deployment of new technology, and monitoring of impacts. We are also looking at further investments to address the visual amenity of the plant, including improvements to the site's exterior and upgrading the landscaping along the McIntyre Road site boundary.



Surrounding residents and other people interested in AkzoNobel's resolution of air quality and noise issues are welcome to attend.....

AkzoNobel Sunshine North Community Forum 3

15 July 2021
6:15 - 7:30pm (Log in from 6:10pm)

**Venue: Glengala Hall, cnr Glengala Road and Simmie Street, Sunshine West
And via Zoom Link (to be emailed before the forum)**

RSVP essential by 9am, 14 July: (<https://www.surveymonkey.com/r/AN3-15July21>)

PURPOSE OF THE SESSION:

To enable community members to ask questions, discuss their concerns about air quality and noise (relevant to AkzoNobel) and hear about progress, compliance and enforcement.

AGENDA

- 6:15 Welcome (Peter Black, AkzoNobel Sunshine North Site Manager)
Meeting introduction (Jen Lilburn, independent facilitator)
- 6:25 AkzoNobel: Introduction by Peter Black (Site Manager)
Topics include
- o Carbon filter (interim odour solution) update
 - o RTO (permanent odour solution) update
 - o Mill No. 1 Fan replacement (main part of noise solution) update
 - o Community discussion
- 6:55 EPA: Introduction by Stephen Lansdell (Western Metropolitan Regional Manager, EPA Victoria) and Sam Sparks (Senior Environment Protection Officer)
Topics include
- Compliance and enforcement update
 - Environmental Public Health Unit update
 - Community discussion
- 7:25 Closing