

13 APPENDIX B – ENVIRONMENT PROTECTION AUTHORITY (EPA) LICENCE

20 March 2007

Mr Gerard Kennedy
Manager Eastern Operations
Environmental Health & Safety
Alcoa Power Station
Camp Road
ANGLESEA VIC 3230

Our Ref: 32162

Dear Mr Kennedy

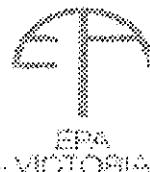
AMENDMENT OF WASTE DISCHARGE LICENCE

I enclose our notice of amendment and the amended licence number EM32162 for the coal fired power station at premises situated at Camp Road, Anglesea.

The licence held by Alcoa of Australia Ltd (Alcoa) for the power station has been amended as follows:

- * Table 1 has been amended to reduce the maximum emission rate of oxides of sulfur;
- * Condition 2.38 has been added to require a rehabilitation plan for the asbestos landfill;
- * Conditions 2.8-2.12 have been added to require development of a Sulfur Dioxide Management Plan; and
- * Conditions 2.13-2.17 have been added to require the development of an Air Emissions Management Plan.

If Alcoa objects to any of the conditions of its amended licence, it may have the decision reviewed by applying in writing, to the Registrar, Planning Division, Victorian Civil and Administrative Tribunal, 7th Floor, 55 King Street, Melbourne within 21 days of the date of issue. An application fee



may be applicable when lodging an appeal with VCAT. Contact VCAT on (03) 9628 9777 for further details on fees associated with the appeal. A copy of the appeal should also be forwarded to the Executive Director of Regional Services, Environment Protection Authority, GPO Box 4395QQ, Melbourne, 3001, within 7 days of lodgement of any appeal.

The amended conditions of the licence do not come into effect until any appeal is resolved and the existing licence applies until that time. Alcoa's licence fee is being assessed and will be forwarded shortly.

If you need additional information or assistance, please contact Matthew Natonewski on 5226 4825.

Yours sincerely



MAXWELL KEITH COSTELLO
MANAGER, AUTHORITY DECISIONS

NOTICE

**ENVIRONMENT PROTECTION ACT 1970
SECTION 20(9) (b) and (c)
NOTICE OF AMENDMENT OF LICENCE**

TO: **ALCOA OF AUSTRALIA LTD**
OF: **CNR DAVEY ST & MARION ST, BOORAGOON WA**

WHEREAS a licence number EM32162 was issued to **ALCOA OF AUSTRALIA LTD** by the Environment Protection Authority ("the Authority") on 26 June 1997 in respect of premises situated at Camp Road Anglesea ("the premises") pursuant to the Environment Protection Act 1970 ("the Act")

NOW TAKE NOTICE that the Authority pursuant to section 20(9)(b) of the Act
HEREBY REVOKES all the conditions to which the licence is subject

AND TAKE FURTHER NOTICE that the authority pursuant to section 20(9)(c) of the Act hereby attaches to the licence the new conditions, contained in the attached amended licence.

DATED **20 March 2007**

Max Costello
MAXWELL KEITH COSTELLO
MANAGER, AUTHORITY DECISIONS

NOTE:

IF FOUND GUILTY OF CONTRAVENING A CONDITION TO WHICH THE LICENCE IS SUBJECT, YOU MAY BE ORDERED TO PAY A FINE OF UP TO \$257,832 (SECTION 27(2) OF THE ACT).



LICENCE

issued under Section 20 of the Environment Protection Act 1970

This licence allows the licence holder to discharge waste to the environment from the premises subject to the attached conditions.

LICENCE HOLDER: ALCOA OF AUSTRALIA LTD (ACN: 004 679 298)

REGISTERED ADDRESS: CNR DAVEY ST & MARION ST, BOORAGDON WA 6154

Premises ADDRESS: ANGLESEA POWER STATION, CAMP RD,
ANGLESEA VIC 3230

LICENCE NUMBER: EM32162

DATE OF ISSUE: 26 JUNE 1997

DATE OF AMENDMENT: 20 MARCH 2007

Max Costello

MAXWELL KEITH COSTELLO
MANAGER, AUTHORITY DECISIONS



because this is our home

EPA INFORMATION CENTRE

40 City Road Southbank Victoria 3006 Tel 03 9675 2722 Fax 03 9675 2730

email: epavictoria.vic.gov.au

www.epavictoria.vic.gov.au

Plant Activities	This licence applies to a premises where brown coal is mined and electricity is generated in a coal-fired power station. The licence covers: air discharges; mine, ash pond and sewage water discharges; and ash, asbestos and solid inert waste disposal.
Licence Objectives	<p>The licence holder shall adopt the following objectives for the protection of the environment:</p> <ul style="list-style-type: none">• meet environmental quality requirements for all segments of the environment. This includes meeting the general provisions of the <i>Environment Protection Act 1970</i>, State environment protection policies, and Industrial waste management policies. In particular,• <i>Industrial waste management policy (Prescribed Industrial Waste)</i>;• <i>State environment protection policy (Waters of Victoria)</i>;• <i>State environment protection policy (Groundwaters of Victoria)</i>;• <i>State environment protection policy (Air Quality Management)</i>;• <i>State environment protection policy (Prevention and Management of Contamination of Land)</i>• operate in accordance with good environmental practice at all times; and• take opportunities to minimise waste and continuously improve environmental performance.
Licence Structure	<p>The licence consists of the following parts.</p> <ol style="list-style-type: none">1. <i>Waste Management</i><ul style="list-style-type: none">• specifies the general requirements under which wastes may be discharged to the environment.• specifies which wastes may be stored, treated or otherwise disposed of and the general requirements under which this may occur.2. <i>Operational Controls</i><ul style="list-style-type: none">• includes operating requirements for good waste management and protection of the environment under both normal and plant upset conditions.3. <i>Monitoring and Reporting</i><ul style="list-style-type: none">• specifies the monitoring requirements and the arrangements for submission of reports to EPA.4. <i>Plan of Premises</i><ul style="list-style-type: none">• plan of the premises covered by this licence, including discharge points.
Definitions	"EPA" or "the Authority" means the Environment Protection Authority.



1. WASTE MANAGEMENT**General**

- 1.1. Odours offensive to the senses of human beings must not be discharged beyond the boundaries of the premises.

DISCHARGES TO AIR

- 1.2. All wastes specified in Table 1 discharged to air from the premises must be discharged:
- only at discharge point 1, the location of which is indicated on the attached Plan of Premises;
 - vertically upwards by means of a stack which must not terminate at a height above ground level less than that specified in the Table;
 - at a rate not exceeding that specified in the Table;
 - at a velocity not less than that specified in the Table; and
 - so that there are no visible emissions excluding water vapour.
- 1.3. Wastes other than those specified in Table 1 must not be discharged from the corresponding discharge points specified in the Table.
- 1.4. The licence holder must maintain a device that continuously monitors and records the concentration of sulfur dioxide and the flow rate in Discharge Point 1.

TABLE 1: Emission Limits and Discharge Requirements

DISCHARGE POINT IDENTIFICATION	DISCHARGE REQUIREMENTS		EMISSION LIMITS		MONITORING FREQUENCY ⁴
	DP No.	Discharge Point Description	Min. Stack Height (m)	Min. Velocity (m/sec)	
1	Precipitator	108	8		Particles 4.19
	Exhaust				Oxides of Sulfur ² 100
	Stack				Oxides of Nitrogen ³ 10
					Carbon Monoxide 2

Notes

- to be sampled after the electrostatic precipitator
- "Oxides of Sulfur" mean the sum of all oxides of sulfur expressed as Sulfur Dioxide
- "Oxides of Nitrogen" mean the sum of all oxides of nitrogen expressed as Nitrogen Dioxide.
- In addition to the requirement in condition 1.4.



DISCHARGES TO WATER AND LAND**Sampling Points**

- 1.5. The licence holder must install and maintain water sampling points at the points described below and shown on the attached Plan of Premises:
- SP1: approximately 1100 metres upstream of the point where Marshy Creek flows under the Coalmine Road Bridge;
 - SP2: approximately 1000 metres upstream of the point where Marshy Creek flows under the Coalmine Road Bridge;
 - SP3: at the weir approximately 100 metres upstream of the Coalmine Road Bridge;
 - SP4: approximately 500 metres upstream of the point where Marshy Creek flows under the Coalmine Road Bridge;
 - SP5: at the pumpwell alongside the pumphouse pumping pond effluent to the irrigation area; and
 - SP6 at the Coalmine Road Bridge.
- 1.6. The sampling points referred to in condition 1.5 must be:
- as near as practicable to the discharge point;
 - such that samples may be easily obtained and are representative of the waste discharged; and
 - easily accessible at all times to authorized officers of EPA.

Water discharges

- 1.7. The wastes specified in Table 2 may be discharged from the premises at:
- from discharge point numbers SP1 and SP4 to Marshy Creek as shown on the Plan of Premises;
 - at a rate not exceeding that specified in the Table; and
 - at a concentration not exceeding that specified in the Table.

Table 2 Waste discharge limits

Parameter	Unit	SP1	SP4
Average Flow	Ml/day	3.9	1.5
pH	Units	4.10	3.0
SS	mg/l	100	100
Colour	Pt-Co Units	50	50
AI	mg/l	10	10
Fe	mg/l	10	20
Zn	mg/l	0.4	2.0
B	mg/l	TBD ¹	TBD

¹ TBD means "to be determined"

- 1.8. Notwithstanding anything to the contrary in this licence the wastewater from the premises must only be discharged to Marshy Creek at SP3 if the wastewater meets the quality criteria specified in Table 3.
- 1.9. Notwithstanding anything to the contrary in this licence, where the background or upstream levels measured at SP2 meet the values in Table 3 (rate of discharge excluded), the wastewater from the premises must only be discharged



to Marshy Creek if the wastewater meets the water discharge limits specified in Table 3 at SP3.

- 1.10. Notwithstanding anything to the contrary in this licence, where the background or upstream levels measured at SP2 exceed the values in Table 3 (rate of discharge excluded), the wastewater from the premises must only be discharged to Marshy Creek:
- the pH at SP3 not being lower than the pH at SP2; and
 - the measured values at SP3 not exceeding the measured values at SP2 for the other parameters in Table 3.

Table 3: Water Discharge Limits¹

Parameter	Unit	Maximum Value	Sampling Frequency
Rate of Discharge	ML/day	32.9	All monthly
Suspended Solids	mg/L	30	
Colour	Pt-Co units	50	
Iron	mg/L	4.0	
Aluminium	mg/L	5.5	
Zinc	mg/L	0.3	
Boron	mg/L	TBD ²	
Parameter	Unit	Range	
pH		5-9	

1: Sampled at SP3.

2: "TBD" means "to be determined".

Mixing Zone

- 1.11. The mixing zone applicable to the discharges shall be those waters of the Marshy Creek between SP1 and SP3 indicated on the attached Premises Plan.
- 1.12. The pH and metals objectives for the General segment, *State environment protection policy Waters of Victoria*, do not apply to the waters contained in the mixing zone specified in Condition 1.11.
- 1.13. Within the mixing zone specified in Condition 1.11, the waste discharge must not cause:
- the level of dissolved oxygen to be less than 6 milligrams per litre;
 - objectionable odours;
 - visible floating foam, oils, grease, scum, litter or other objectionable matter; or
 - mortality of fish or other motile species.

Ashing wastewater discharges

- 1.14. Wastewater from the twin ash ponds must only be discharged:
- to the power station as ashing return water; or

- b) to Marshy Creek subject to the conditions specified in Table 2.

Sewage effluent discharges

- 1.15. Sewage effluent from the power station must only be discharged to sewage ponds as identified on the attached Plan of Premises subject to the conditions specified in Table 4.
- 1.16. Wastewater from the sewage ponds must only be disposed by spray irrigation to the area of land identified as "sewage sprays" on the attached Plan of Premises.

Table 4: Sewage Water Limits¹

Parameter	Unit	Maximum Value	Sampling Frequency
Biochemical Oxygen Demand	g/m ³	40	January, April, July and October
Flow	m ³ /day	15	N/S ²

¹ At SPS.

² N/S means "Not Specified".

- 1.17. The waste as sampled at SPS must not contain visible floating oil, grease, scum, litter or other objectionable floating matter.

Asbestos and Solid Inert Waste landfill

- 1.18. Waste deposited at the premises within the area identified as "Asbestos Dump" on the attached Plan of Premises must only consist of:
- asbestos and asbestos products;
 - material contaminated with asbestos; and
 - solid inert waste including man-made mineral fibres;
 - that have been removed from the power generation plant at the premises.
- 1.19. Asbestos must be handled such that dust containing asbestos fibres is not generated.
- 1.20. The handling and disposal of waste asbestos must be conducted in accordance with the most recent EPA Publication 364 *The Transport and Disposal of Waste Asbestos*.

Ash disposal to Mine

- 1.21. Wastes from the power station ashing system, consisting of ash from the coal fired boiler and blowdown from the water treatment plant, must only be discharged into the twin ash ponds.
- 1.22. Any sludge removed from the twin ash ponds must be deposited into the mine unless otherwise approved in writing by the Authority.



2 OPERATIONAL CONTROLS

Discharges to Air

- 2.1 The stack serving discharge point 1 must be fitted with a device to continuously measure and record the opacity of the exhaust gas stream.
- 2.2 The device referred to in condition 2.1 must activate an audible alarm whenever the opacity of the discharge exceeds 0.25 grams per normal cubic metre.
- 2.3 The licence holder must ensure that the monitoring, recording and alarm equipment referred to in condition 2.1 is properly maintained and calibrated.
- 2.4 The exhaust air stream must pass through an electrostatic precipitator prior to discharge from discharge point 1.
- 2.5 The electrostatic precipitator referred to in condition 2.1 must be maintained in good operating condition at all times.
- 2.6 The electrostatic precipitator referred to in condition 2.1 must be energised at all times when the boiler associated with the discharge point number 1 is operating on brown coal.
- 2.7 Except for the products of combustion of oil produced during start-up using fuel oil, no gaseous and particulate matter leaving the boiler must be passed through a cell of the electrostatic precipitator in which all three fields have been de-energised by electrical or mechanical failure or for maintenance purposes.

Sulfur Dioxide Reduction

- 2.8 By the 25 May 2007 the licence holder must submit to EPA for approval, a Sulfur Dioxide Management Plan to ensure that sulfur dioxide emissions are managed in accordance with the requirements of the *State environment protection policy (Air Quality Management)*.
- 2.9 The Sulfur Dioxide Management Plan referred to in Condition 2.8 must include:
 - a) measures to reduce sulfur dioxide emissions using industry best practice, pollution control equipment and management procedures;
 - b) the projected maximum and average concentrations and mass rates of sulfur dioxide that would be emitted following the application of industry best practice pollution control and management procedures;
 - c) a timetable for the implementation of the measures proposed in 2.9(a) above;
 - d) demonstration of how the objectives of the *State environment protection policy (Air Quality Management)* will be met at all times under normal operating conditions; and
 - e) a review of the Load Reduction Protocol including any proposed amendments that are necessary to ensure that the objectives of the *State environment protection policy (Ambient Air Quality)* will be met at all times.
 - f) The report referred to in condition 2.8 must include a Community engagement plan and procedures to ensure the Anglesea community is appropriately informed on the sulfur dioxide reduction strategy including community notification procedures for exceedance of State Environment Protection Policy (Air Quality Management) (SEPP AQM) environmental objectives.



- 2.10 By the 1 May 2010 the licence holder must install pollution control equipment and implement management procedures as identified in the Sulfur Dioxide Management Plan referred to in condition 2.9 as approved in writing by EPA.
- 2.11 The licence holder must manage and operate the premises in accordance with the current version of the Sulfur Dioxide Management Plan approved in writing by EPA.
- 2.12 The licence holder must provide progress reports to EPA in relation to the Sulfur Dioxide Management Plan. These reports must be supplied by 1 January 2008, 1 July 2008, 1 January 2009 and 1 July 2009.

Air Emissions Management Plan

- 2.13 By the 1 July 2007, the licence holder must submit to the Authority for approval a premises-wide Air Emissions Management Plan further detailing the nature of air emissions from the power plant.
- 2.14 The report referred to in Condition 2.13 must include an assessment of the emission(s) of:
 - a) PM₁₀;
 - b) PM_{2.5};
 - c) PAHs (including benzo (a) pyrene);
 - d) VOCs (including benzene);
 - e) sulfur trioxide;
 - f) chlorine compounds;
 - g) fluorine compounds; and
 - h) Metals (including mercury and class 3 indicators).
- 2.15 The report referred to in condition 2.13 must include an EPA-approved monitoring program that will allow for the establishment of EPA licence limits for the compounds.
- 2.16 The report referred to in condition 2.13 must demonstrate that the licence holder is minimising any adverse environmental impact caused by air emissions from the power plant by the application of:
 - a) industry best practice for class 3¹ indicators and reduced to the maximum extent achievable for any class 3² indicators;
 - b) appropriate pollution control equipment; and
 - c) appropriate management procedures.
- 2.17 The report referred to in condition 2.13 must include a Community engagement plan and procedures to ensure the Anglesea community is appropriately informed about the Air Emission Management Plan including community notification procedures for exceedance of State Environment Protection Policy (Air Quality Management) (SEPP AQM) environmental objectives.

¹ As defined in the State environment protection policy (Air Quality Management)

² As defined in the State environment protection policy (Air Quality Management)



DISCHARGES TO WATER AND LAND

Sewage Effluent Ponds

- 2.18 The pond system must be maintained so as to prevent any discharge through the beds or banks from adversely affecting the beneficial uses of surface or underground waters.
- 2.19 The inlet pipe to the primary pond must enter below water level.
- 2.20 The pond system must be operated and maintained in such a way as to ensure that the banks are not overtopped by waste.
- 2.21 The inner batters of all the ponds must be kept clear of grass and weed growth.
- 2.22 A secure fence of not less than post and wire standard must be maintained around the pond to restrict access by persons or cattle.

Sewage Effluent Irrigation

- 2.23 Effluent from the sewage lagoon must only be disposed of at the premises referred to in condition 1.15 by spray irrigation.
- 2.24 No spraying or irrigation must take place while the irrigation area is open to the public.
- 2.25 A standby pump must be provided at the site for use in the event of failure of the irrigation pump.
- 2.26 "In service" and "Standby" irrigation sprays must be alternated monthly.
- 2.27 Adequate bunding and cut-off drains must be maintained around the irrigation area to prevent entry of run-off from adjacent land and to prevent waste leaving the premises.
- 2.28 The licence holder must undertake appropriate soil conservation measures where necessary in order to avoid soil erosion occurring as a result of the irrigation activities.
- 2.29 Irrigation of effluent must be carried out in such a manner that no spray drift is detectable beyond the boundaries of the premises.
- 2.30 Irrigation of effluent must be carried out in such a manner that no spray drift is detectable beyond the boundaries of the premises.
- 2.31 Spray irrigation must not take place within 50 metres of the property boundary.
- 2.32 The waste collection, treatment and disposal facilities must be regularly inspected and maintained by the licence holder, or a person nominated by the licence holder.

Asbestos and Solid Inert Waste Landfill

- 2.33 Seepage of waste to groundwater at the premises must not cause any groundwater quality objective, as specified in State environment protection policy (*Groundwaters of Victoria*), to be exceeded.
- 2.34 No waste must be deposited into water.



- 2.35 The landfill site must be staffed at all times when it is open for the receipt of asbestos waste.
- 2.36 All waste must be tipped or deposited in layers not exceeding a vertical height of 3 metres.
- 2.37 Compaction of asbestos waste must only take place immediately after the waste is covered with no less than 300 mm of soil.
- 2.38 All asbestos waste or asbestos contaminated materials must be placed in double, heavy duty polyethylene bags and sealed with adhesive tape or wrapped securely with one or two layers of polyethylene sheeting.
- 2.39 Packages containing asbestos waste must be properly and clearly labelled, "Caution - Asbestos - Do Not Inhale Dust".
- 2.40 Asbestos waste must be deposited at the base of the tipping area in a manner which prevents the rupturing of polyethylene bags or wrapping containing asbestos waste for disposal at the premises.
- 2.41 The licence holder must keep a written record of the type, amount and location of all asbestos waste and waste materials contaminated with asbestos deposited at the premises.
- 2.42 The licence holder must maintain a two metre high chain mesh fence and lock-up gates around the perimeter of the landfill.
- 2.43 Signs must be prominently displayed at the entrance to the asbestos landfill indicating:
- a) the EPA waste discharge licence number;
 - b) the types of wastes which may be deposited;
 - c) that fires must not be lit on the premises;
 - d) where wastes may be deposited;
 - e) emergency contact phone numbers; and
 - f) a sign warning operators at the tipping area used to deposit asbestos which reads "Asbestos Disposal Site - Do Not Inhale Dust".
- 2.44 All surface drainage must be diverted away from the tipping area used for the disposal of asbestos waste.
- 2.45 Litter arising from the landfill operations must at all times be confined within the boundaries of the landfill.
- 2.46 No waste must be permitted to be discharged beyond the boundaries of the landfill.
- 2.47 An all weather access road must be provided and maintained to the tipping area at the landfill.
- 2.48 The final surface of the landfill site must be graded, drained and vegetated to minimise erosion and to prevent ponding of stormwater on the landfill.
- 2.49 By 1 July 2007 the licence holder must provide a landfill rehabilitation plan which includes:
- a) a map delineating the extent and location of the landfill and the Tipping areas;
 - b) final contour plans at the completion of waste filling; and
 - c) proposed landfill cap design and specifications for the construction of the cap.



3. MONITORING AND REPORTING

GENERAL

- 3.1. All samples must be obtained by or under the instruction of a qualified analyst.
- 3.2. The licence holder must:
 - a) ensure that the date, time and results of all sampling, analyses, inspections and maintenance works are accurately recorded in writing and signed by a responsible officer; and
 - b) make the results of the monitoring program available to an authorised officer of EPA upon any request to do so.
- 3.3. All samples for analysis must be submitted to an analytical laboratory accredited by the National Association of Testing Authorities (NATA) to undertake the analyses specified in this Licence, unless the publications referred to in conditions 3.6 or 3.8 recommend in-situ testing.
- 3.4. The licence holder must ensure that the record of analysis results bears a NATA stamp endorsement.
- 3.5. The licence holder must ensure that all of the records required by this licence are accessible at all times for inspection by any authorized officer of the Environment Protection Authority.

Discharges to Air

- 3.6. The wastes discharged from discharge point 1 listed in Table 1 must be tested in accordance with the most recent edition of EPA Publication No 440 *A Guide to the Sampling and Analysis of Air Emissions* at a frequency of not less than that specified in the Table.
- 3.7. The licence holder must maintain a written record of all breakdowns or failures of, and inspections and maintenance carried out on, the electrostatic precipitator associated with Discharge Point number 1.

Water Discharges

- 3.8. The wastes discharged from the discharge points listed in Tables 2, 4, and 5 must be tested in accordance with EPA Publication No 441, *A Guide to the Sampling and Analysis of Water and Wastewater* at a frequency of not less than that specified in the Tables.



Additional Water Monitoring Program

- 3.9. The following parameters must be monitored at the sampling sites and at the sampling frequencies indicated in Table 5.

Table 5: Additional Water Monitoring Requirements

Sampling Point		Parameters	Unit	Sampling Frequency
SP2	1000 metres upstream of Coalmine Road Bridge	Suspended Solids	mg/L	All Monthly
		Iron	mg/L	
		Zinc	mg/L	
		Aluminium	mg/L	
		Temperature	°C	
		pH	pH units	
SP6	Coalmine Road Bridge	Suspended Solids	mg/L	All Monthly
		Iron	mg/L	
		Zinc	mg/L	
		Aluminium	mg/L	
		Temperature	°C	
		pH	pH units	

Complaint Recording

- 3.10. The licence holder must keep a written record of all complaints received concerning the environmental impact of the premises which includes:
- name and address of complainant;
 - date and time of complaint;
 - location from which complaint arose;
 - general description of the nature of the complaint;
 - approximate wind direction and temperature at the time of the complaint;
 - the likely source of the cause of the complaint; and
 - action taken by licence holder.

Exception Report

- 3.11. The licence holder must notify the Authority's Geelong office immediately by fax of any incidents that may lead to an unlicensed discharge of waste or an environmental hazard.
- 3.12. The licence holder must notify the Authority's Geelong office as soon as practicable in writing of any performance monitoring result which indicates a



breach of any condition of this licence or any State environment protection policy.

3.13. The notifications required by conditions 3.6 and 3.8 must include:

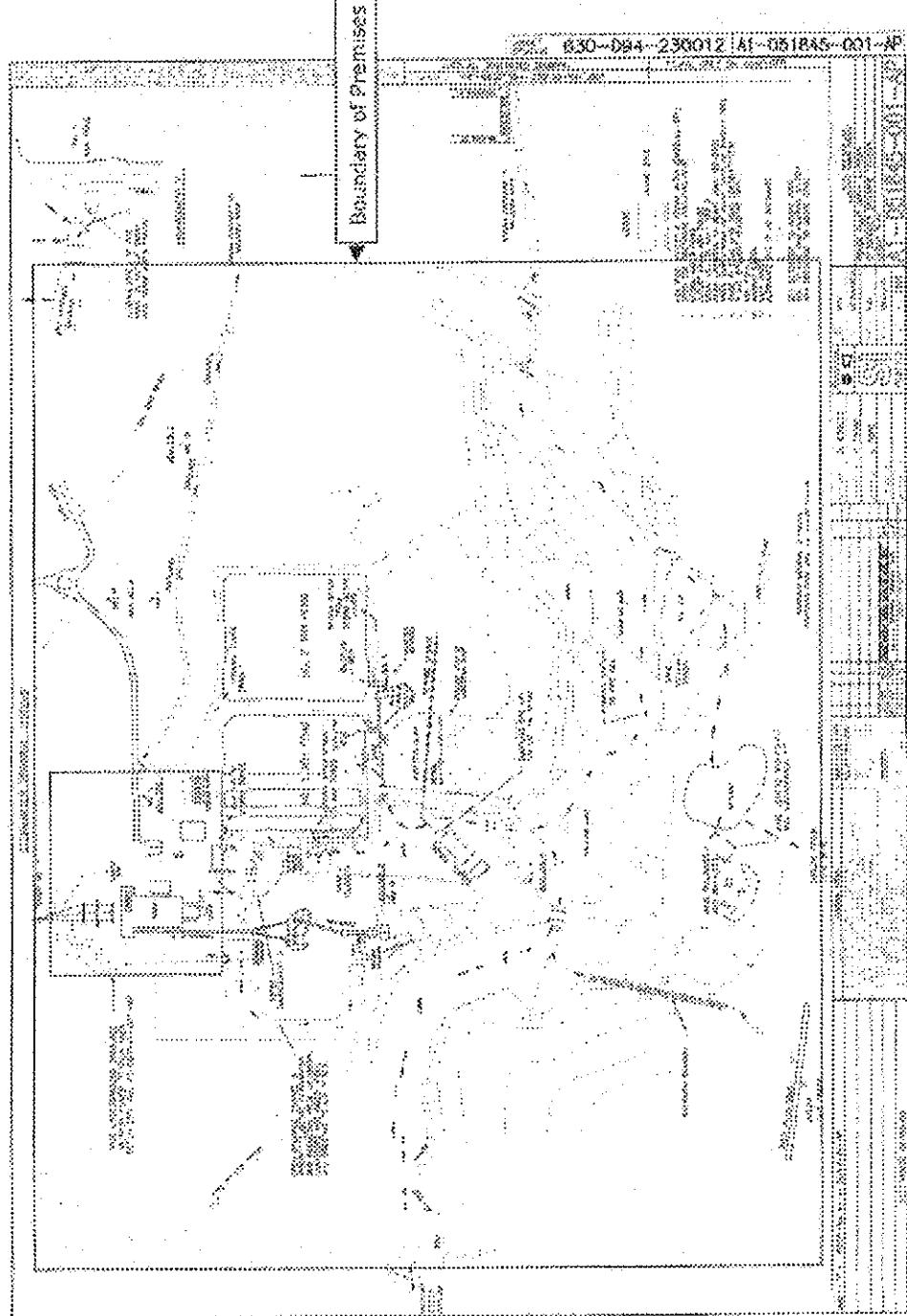
- a) the actual monitoring result and all maintenance and inspection records related to the incident; and,
- b) an explanation of what caused the incident and details of the measures taken to rectify the problem and prevent a recurrence.

Annual Performance Report

3.14. By 28 February each year, the licence holder must submit a performance report to the Authority for the preceding calendar year, prepared in a form agreed to by the Authority. The performance report must be authorised by the licence holder's managing director.



4. PLAN OF PREMISES



030-084-238012141-081845-001-AP