

Our ref: RJ Dowsett- PPTY/17-16-20.11



19 June 2012

Ms Kerry Hamann
Environmental Planning Officer
Mining and Industry Projects
Department of Planning & Infrastructure
23-33 Bridge Street,
Sydney NSW 2000

Dear Ms Kamann

**RE: Proposed Modification to Qenos Alkatuff Plant – Hydrogen Trailer
Unloading Bay**

The Council has received notification from the Department regarding the above mentioned modification application to Qenos Alkatuff Plant. The modification application seeks approval for the construction and operation of a hydrogen trailer unloading bay at the Botany Industrial Park, Matraville. In addition, it also seeks approval for some minor administrative amendments to both DA 35/97 and DA2181 to contemporise and streamlines various reporting requirements.

Based on the information provided by the Department, Council raises the following issues:

- **Traffic** – The report states that *“heavy vehicles would be required for the delivery and removal of bulk material and small number of light vehicles would be necessary for the transport of construction personnel to and from site ... once operational, the Qenos Alkatuff plant would experience an increase of 133 vehicle movements associated with the delivery of hydrogen per year. This would equate to no more than approximately 0.4 additional vehicle movements per day in each direction ... Construction traffic associated with the proposed hydrogen trailer unloading bay has yet to be determined”*. The report fails to identify the type of truck/s (i.e. B Double, Double Road Train or Triple Road Train) that will be used during the construction period and the delivery of hydrogen. The lack of transport planning prevents Council from determining the likely traffic impacts on the surrounding road network. Hence, Council requests that a Traffic Report be prepared and address the following the issues:
 - Type of truck that will be used during the construction period and delivery of hydrogen (i.e. B Double, Double Road Train or Triple Road Train);
 - Timing of delivery;
 - Number of delivery per day;

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- Identify the delivery routes ; and
- Assess the likely traffic impact generated by the proposed modification.

It should be noted that Denison Street is identified as a “classified road” and is under the control of Road and Maritime Services (RMS). Hence, Council recommends RMS be consulted prior to project approval.

- **Transport Hazard** – As stated in the report, “*the expected number of hydrogen deliveries to the site would not exceed the thresholds specified in Apply SEPP 33 (i.e. >500 deliveries per annum or >30 deliveries per week)*”. However, the report fails to identify the expected number of hydrogen deliveries to the site per year or assess the cumulative transportation risks of the additional hydrogen delivery trucks.
- **On-site hydrogen storage** – The report indicates that the modification will “*allow for a maximum on-site inventory of two fully load trailer containing Class 2.1 compressed hydrogen gas ... which equates to an approximate weight of 350kg per fully loaded trailer*”. However, the report fails to state the overall volumes of hydrogen gas to be stored at the Qenos facility and whether it will exceed the WorkCover Notification Thresholds.
- **Preliminary Hazard Analysis** – The “prevention/protection measures” identify in the *Preliminary Hazard Analysis of Proposed Hydrogen Trailer Bay Unloading Facility* (prepared by Peter Grosskopf) be conditioned as part of the project approval.
- **Insufficient Information** – The modification seeks the construction and operation of a hydrogen trailer unloading bay. However, no plan or dimension of the hydrogen trailer unloading bay was provided.
- **Hazard Auditing** – As the subject site is located within close proximity to residential development (located on the eastern side of Denison Street); Council requests to be notified of all hazards auditing relating to DA 35/97.

Council recommends that any approval for the proposed modification should address the above issues and include the following conditions:

- Soil testing is to be undertaken for the proposed trailer bay as indicated in **Figure 1 - Site Location** of the Section 75W Modification Request prepared by AECOM (dated 17 May 2012). A Remedial Action Plan (RAP) is to be prepared, if contamination is found, in accordance with the SEPP No.55 – Remediation of Land.
- All works must be undertaken during standard day time construction hours of 7am to 6pm (Monday to Friday) and 7am-1pm (Saturday). No work is to be undertaken on Sunday or public holidays without prior approval.
- A Construction Environmental Management Plan (CEMP) to be prepared for the construction phase. The CEMP should be approved by the relevant authorities prior to construction.

- All waste generated by the modification is to be classified in accordance with the NSW DECCW *Waste Classification Guidelines (2009)* prior to disposal by a licensed waste contractor.

If you have any questions regarding Council's submission please contact Mr Gilead Chen – Senior Strategic Planner on (02) 9366 3566 or the writer on (02) 9366 3553.

Yours faithfully



R J DOWSETT
DIRECTOR – PLANNING & DEVELOPMENT



