

11 July 2012

Ms Kerry Hamann
 Planner
 Major Projects Assessment
 NSW Department of Planning and Infrastructure
 GPO Box 39
 SYDNEY NSW 2000

Dear Ms Hamann

DA 35/97 MOD 1 and DA 2181 MOD 1 - Qenos Hydrogen Unloading Facility - Response to Issues Raised by the City of Botany Bay Council

I refer your email of 10 July 2012 with which you sought a formal response from Qenos Pty Ltd (Qenos) in response to the issues raised by the City of Botany Council in its submission on the abovementioned modification requests. Please find below a response to each issue raised by Council.

1.0 Responses to Issues Raised by Council

Issue	Response
<p>Preparation of a Traffic Report that addresses the following issues:</p> <ul style="list-style-type: none"> - Type of truck that will be used during the construction period and delivery of hydrogen (ie B Double, Double Road Train or Triple Road Train); 	<p><u>Construction Period</u></p> <p>During construction of the proposed modifications, the following vehicles would be employed:</p> <ul style="list-style-type: none"> - concrete trucks for the delivery of concrete for civil works; - utility vehicles (utes) for the transport of tradespeople and equipment; - delivery table top trucks for the delivery of the deluge system, and bobcat/ excavator. <p>It is expected that two to three vehicle movements per day would be required during the construction period. Given the low level of traffic generation and the temporary nature of construction works, a formal traffic impact assessment for the construction period is not considered warranted.</p> <p><u>Operation Period</u></p> <p>Hydrogen deliveries would be made using a standard semi-trailer of 12.2-metre length. A drawing of a hydrogen trailer is attached (Attachment A).</p> <p>As indicated in Section 5.2 of <i>Section 75W Modification Request: Hydrogen Trailer Unloading Bay</i> (AECOM, May 2012), the proposed modification would generate an additional 133 vehicle movements per annum associated with the delivery of hydrogen (equivalent to an increase of 0.4 movements per day). This increase would remain within the maximum traffic limits assessed and approved as part of the Alkatuff Plant Upgrade (DA 35/97), and on this basis, it is contended that no further assessment of operational traffic is required. Qenos could currently and lawfully receive these additional traffic movements under the existing development consent without need for further assessment or approval.</p>
<ul style="list-style-type: none"> - Timing of delivery; 	<p><u>Construction Period</u></p> <p>The timing of construction traffic would be limited by the timing of construction activities, which are proposed to be limited to standard construction hours as nominated in the <i>Interim Construction Noise</i></p>

Issue	Response
	<p><i>Guideline</i> (DECC, 2009).</p> <p><u>Operation Period</u></p> <p>Operations would be undertaken on a 24 hour per day, seven day per week basis. As hydrogen supply is critical to the operation of the facility, deliveries could be required at any time. As noted below with respect to the timing of deliveries, normal operations are expected to require no more than one delivery per day or between two to three deliveries per week (with a peak no greater than four trailers every three days). The risk of multiple deliveries in any one night, or consecutive series of nights, is therefore considered to be negligible with an associated negligible risk of adverse impact on local amenity.</p>
<p>- Number of delivery per day;</p>	<p><u>Construction Period</u></p> <p>As noted above, it is expected that two to three vehicle movements per day would be required during the construction period.</p> <p><u>Operation Period</u></p> <p>Under normal operating conditions, no more than a single delivery of hydrogen is expected each day or between two to three deliveries per week, while peak demand may require up to four deliveries over a three day period. Peak demands may be expected four to six times in any year.</p>
<p>- Identify the delivery routes; and</p>	<p><u>Construction Period</u></p> <p>It is not possible to determine the exact origin of construction materials and labour at this time. However, construction related traffic in proximity to the site would most likely approach from Foreshore Road/ Botany Road, then Beauchamp Road and Denison Street for entry to the site via Gate 3.</p> <p><u>Operation Period</u></p> <p>Hydrogen deliveries would come from the Coregas Port Kembla Facility and are expected to travel the following route: Princes Highway to Arncliffe, West Botany Street, Marsh Street, Airport Drive/ Qantas Drive/ Joyce Drive/ General Holmes Drive/ Southern Cross Drive, Foreshore Road/ Botany Road, Beauchamp Road, Denison Street. Hydrogen deliveries would enter the site via Gate 3.</p> <p>The hydrogen delivery route in proximity to the site is marked in Attachment B.</p>
<p>- Assess the likely traffic impact generated by the proposed modification.</p>	<p>As highlighted above, a detailed traffic assessment for the modifications is not required because:</p> <ul style="list-style-type: none"> - construction traffic generation is low and temporary in nature; - operation traffic has been assessed and approved as part of the existing Alkatuff Plant Upgrade. The traffic generation assumed as part of that assessment would not be exceeded and could currently and lawfully be conducted without the need for further assessment or approval.
<p>The report fails to identify the expected number of hydrogen deliveries to the site per year or assess the cumulative transport risks of the additional hydrogen delivery trucks.</p>	<p><i>Section 75W Modification Request: Hydrogen Trailer Unloading Bay</i> (AECOM, May 2012) states that 133 deliveries of hydrogen would be required per annum, or on average, 0.4 per week. Each delivery would involve 350 kilograms of hydrogen.</p> <p>The <i>Applying SEPP 33</i> (DoP, 2011) guideline only requires consideration of transport hazards if the bulk quantity of Class 2.1</p>

Issue	Response
	<p>dangerous goods exceeds two tonnes. This threshold is not exceeded and therefore no further consideration of transport risks is required.</p> <p>Further, the proposed modification would not result in an exceedance of the cumulative annual vehicle movement threshold (>500) or the peak weekly vehicle movement threshold (>30) for Class 2.1 dangerous goods.</p>
<p>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.</p>	<p>The modification would contribute a maximum hydrogen volume to the site equivalent to two full hydrogen trailers (40m³ or 40,000 litres in total). This volume exceeds the WorkCover Notification Threshold of 5,000 litres for Class 2.1 dangerous goods and as such, an amendment to the existing Dangerous Goods Notification 35/035000 would be made prior to bringing these additional inventories to the site.</p>
<p>The 'prevention/ protection' measures identified in the PHA should be conditioned as part of the project approval.</p>	<p>This is matter for the Department as part of its assessment of the proposed modification.</p>
<p>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.</p>	<p>A plan of the proposed unloading bay is provided as Attachment C.</p>
<p>Council requests to be notified of all hazards auditing relating to DA 35/97.</p>	<p>Hazard Audits for the existing development are submitted directly to the Director-General of the Department as the authority responsible for the regulation and compliance management of the existing development consent. Qenos opposes any requirement to submit Hazard Audits to Council in addition to or in place of the Director-General.</p>
<p>Recommended conditions of approval.</p>	<p>This is a matter for the Department as part of its assessment of the proposed modification.</p>

2.0 Further Information

I trust that the above information is sufficient to address the issues raised by Council in its submission, and to allow the Department to finalise its assessment and determination of the modification requests in a timely manner. Please do not hesitate to contact the undersigned should you wish to discuss or clarify any matter relating to the information in this correspondence or the modification requests more generally.

Yours sincerely



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