Request to Modify Major Project DA No. 35/98: Replacement ChlorAlkali Plant

May 2012

Orica Limited

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Date: .....8 May 2012

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Prepared by Kellogg Brown & Root Pty Ltd

1. Introduction and background

This Part 3A modification has been prepared in accordance with section 75W of the *Environmental Planning and Assessment Act 1979* (the EP&A Act) to seek approval for the replacement of two 1.1 megalitre steel caustic storage tanks and demolition of two existing, and currently disused caustic storage tanks (the Proposal) at the Botany Industrial Park, Matraville (the Site).

This modification has been prepared by Parsons Brinckerhoff on behalf of Orica Limited (Orica), based on a review of relevant environmental and planning legislation, analysis of past approvals for the Site, and an assessment of the predicted environmental impacts of the modification. The suitability of pursuing approval for the Proposal as a modification under s75W has been confirmed in principle by the Department of Planning and Infrastructure in email correspondence on 23 January 2012.

This modification provides a background to the Proposal (section 1), its location and context (section 2), a description of the Proposal (section 3) and an environmental assessment of the key environmental issues (section 4). In summary, the Proposal is recommended for approval given it is likely to have negligible environmental impacts (section 5).

1.1 ChlorAlkali Plant Development Consent (DA No 35/98)

Orica owns and operates a ChlorAlkali Plant, located within the Botany Industrial Park (BIP), in Matraville, NSW. The ChlorAlkali Plant operates in accordance with development consent DA No 35/98, granted by the Minister for Urban Affairs and Planning on 6 November 1998 under the *Unamended Environmental Planning and Assessment Act 1979,* and *State Environmental Planning Policy No 34 — Major Employment Generating Industrial Development*.

The ChlorAlkali Plant produces liquid caustic soda (at a rate of approximately 70,000 litres per day) which is stored onsite in two 1.1 megalitre steel storage tanks (referred to as Existing Tanks 1 and 2) that are situated adjacent to the western boundary of the ChlorAlkali Plant. Existing Tanks 1 and 2 are located adjacent to the redundant Tanks 3 and 4, which were formerly used for liquid storage but are now disused.

The subject of this report is to modify this consent (DA No. 35/98) to replace the existing storage tanks with two new tanks that comply with relevant work health and safety regulations and guidelines (refer to section 3 of this report for more information).
This modification also includes the removal of existing caustic storage tanks from the Site.

2. Location and context

The existing caustic storage tanks are situated on land legally described as Lot 11 of Deposited Plan (DP) 1039919 which is located near Beauchamp Road, Matraville, in the Botany Local Government Area (LGA). A location plan showing the site context of the existing caustic storage tanks is shown in Figure 2.1.

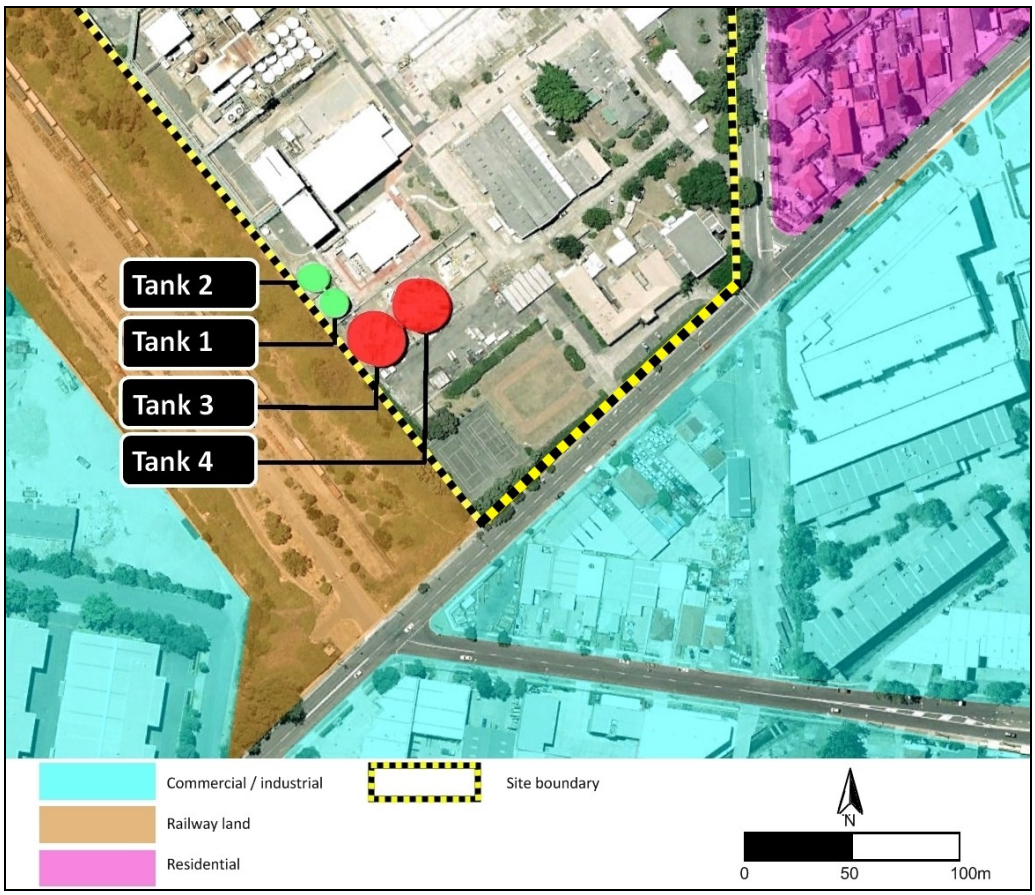


Figure 2.1 Site context

The tanks are situated adjacent to the western boundary of the BIP and are surrounded by the following development:

- To the north are industrial warehouses and premises situated within the BIP (including Orica's ChlorAlkali Plant, Qenos manufacturing facilities and Huntsman surfactant manufacturing facilities).
- To the east are two brick administration buildings (comprising one 2-storey building and one 3-storey building) that are currently utilised by Orica as administration buildings for the ChlorAlkali Plant and other Orica Botany operations. The 2-storey administration building is listed in Schedule 3 of the Botany Local Environmental Plan 1995 (Botany LEP) as being of 'local heritage significance'. Views of the Tanks from the administration building are obscured by trees and buildings east of the ChlorAlkali Plant. Further north are a number of detached 1 and 2 storey residential properties that front onto Denison Street, the closest of which are situated approximately 160 metres from the nearest storage tank (i.e. Tank 4).

- To the south are BIP recreational facilities (comprising two tennis courts and a grassed area used for car parking) and a number of trees. The tennis court facilities and tree cover partially obscure off-site views of the tanks. Further south (across Beauchamp Road) are a number of commercial premises, the closest of which include Hatfield J Motor Engineers, Garry's Auto Services, Matraville Spare Parts and Auto Wreckers. These commercial premises are located approximately 100 metres from the nearest storage tanks (i.e. Tanks 3 and 4).

- To the west is vacant land and freight rail line (owned by Patrick Port Logistics) that travels north to Port Botany. Further west is the Port Botany site.

Access to the Site is provided from Beauchamp Road (primary access point) and Denison Street.

3. Proposed modification

3.1 The Proposal

The purpose of the Proposal is to replace two 1.1 megalitre steel caustic storage tanks (referred to as Existing Tanks 1 and 2) with two new tanks (referred to as New Tanks 1 and 2) that comply with relevant work health and safety regulations and guidelines, including the *Work Health and Safety Regulation 2011*, and dangerous goods storage requirements, including the *Storage and Handling of Dangerous Goods: Code of Practice* (WorkCover 2005). The indicative plans for the two new tanks are provided in Appendix A. The New Tanks 1 and 2 would be located within the current footprint of the existing Tanks 3 and 4. An indicative location of the new tanks is provided in Figure 3.1.

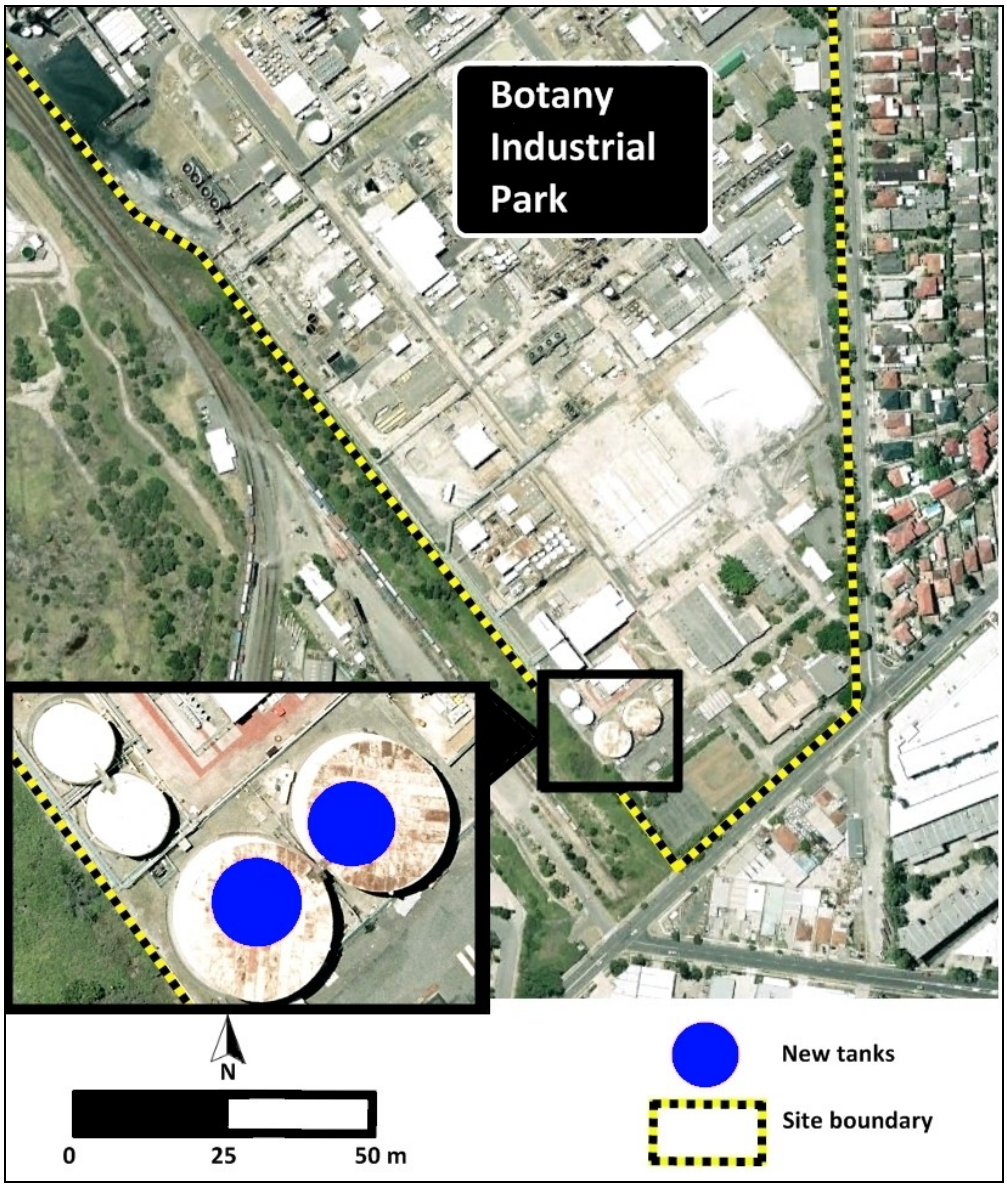


Figure 3.1 Indicative location of new tanks

Recent inspections have identified a number of deficiencies in Existing Tanks 1 and 2, which necessitate their replacement.

In addition to Existing Tanks 1 and 2, Orica also owns two larger steel storage tanks (referred to as Tanks 3 and 4) that are situated adjacent to the southern boundary of the ChlorAlkali Plant (refer Figure 2-1). These tanks are not currently in use and are considered in poor condition. Tank 3 is currently empty and decontaminated, while Tank 4 contains mercury-contaminated sludge and water. Orica does not intend to reuse Tanks 3 and 4 for the storage of liquid caustic soda due to uncertainties regarding the integrity of the existing tanks and their foundations.

In order to allow the ChlorAlkali Plant to remain operational during the replacement of the tanks, the presently disused Tanks 3 and 4 would be decommissioned and removed and the new tanks (New Tanks 1 and 2) established in their position. The construction sequence for the Proposal would generally comprise the following key stages (indicative dates provided):

- Stage 1 (November 2012 – January 2013) – decommissioning, demolition and removal of Tanks 3 and 4 (Existing Tanks 1 and 2 to remain in operation).
- Stage 2 (February 2012 – September 2013) – construction of New Tanks 1 and 2 at the former location of Tanks 3 and 4 (Existing Tanks 1 and 2 to remain in operation).
- Stage 3 (October 2013) – commissioning and operation of New Tanks 1 and 2 (liquid caustic storage to be diverted from Existing Tanks 1 and 2 to the New Tanks 1 and 2).
- Stage 4 (November 2013 – January 2014) – decommissioning, demolition and removal of Existing Tanks 1 and 2.

The Proposal would comprise the decommissioning and demolition (via mechanical cutting) of the existing tanks and the construction of two new single-skinned steel tanks. The new tanks would be established at the former location of Tanks 3 and 4 and would be enclosed with conventional concrete wall bunds. The storage capacity of the new tanks would be the same as that of Tanks 1 and 2 (i.e. 2 x 1.1 megalitres).

It is anticipated that the Proposal would generate approximately 320 tonnes of general construction waste (primarily steel from the decommissioned tanks). In addition, the Proposal would require onsite treatment and disposal of mercury-contaminated sludge from Tank 4. Waste management procedures for the Proposal are discussed in section 4.2.4.

The Proposal involves the removal of bitumen ground surface, post demolition/removal of the tanks (3 and 4). Once this surface has been removed, soil testing will be undertaken, and any contaminated soil would be treated/removed in accordance with relevant environmental and Orica standards. New tanks 1 and 2 would be installed in a bunded area with impervious surface to ensure that there is limited potential for any contamination of soil in the future.

The Proposal would take approximately one year to complete and would be undertaken during standard construction hours (7 am – 6 pm Monday to Friday and 8 am – 1 pm Saturdays). It is anticipated that approximately 70 truck and light vehicle movements would be generated during construction works in 2012 and 60 truck and light vehicle movements during construction works in 2013. This traffic would enter and exit the site via Denison Street, Matraville. The ChlorAlkali Plant would remain operational throughout the Proposal.

The Proposal does not involve any change of use of the property nor change in the volume of liquid caustic soda to be stored on the Site.

3.2 Proposed modification

In order to facilitate the Proposal described in section 3.1 above, a modification to the existing Development Consent 35/98 would be required. Approval is sought for the following amendment to the existing project approval to facilitate the Proposal:

- Omit condition 1.1(f), and insert:

  "1f) Modification 4 to install new caustic storage tanks; and

  1g) the conditions of consent"

- Omit condition 1A, and insert:

  "In the event of an inconsistency between a condition of this consent and the documents listed under a) to f) above, the conditions of consent shall prevail to the extent of the inconsistency."

4. Environmental assessment

4.1 Relevant legislation

The following environmental legislation and planning instruments are relevant to the Proposal:

- *Environmental Planning and Assessment Act 1979* (EP&A Act).
- *Protection of the Environment Operations Act 1997* (POEO Act).
- State Environmental Planning Policy (Major Development) 2005.
- State Environmental Planning Policy No. 33 – Hazardous and Offensive Development.
- State Environmental Planning Policy No. 55 – Remediation of Land.

An assessment of the Proposal in consideration of this legislation is provided below.

4.1.1 *Environmental Planning and Assessment Act 1979*

The ChlorAlkali Plant (DA No. 35/98) was granted development consent on 6 November 1998 under the *Unamended Environmental Planning and Assessment Act 1979,* and *State Environmental Planning Policy No 34 — Major Employment Generating Industrial Development (SEPP 34)*. Although the ChlorAlkali Plant was originally assessed as a development application, under clause 8J(8) of *the Environmental Planning and Assessment Regulation 2000*, this development consent is considered to be a Part 3A approval.
This modification application has been lodged under s75W of the EP&A Act, which continues to apply to this development consent (EP&A Act Sch 6A, cl 12).

Section 75W(2) allows a proponent to lodge a request for modification of a Part 3A project with the Director-General of the Department of Planning and Infrastructure (DP&I). The Court of Appeal has indicated that modifications under s 75W should be of 'limited environmental consequences beyond those' evaluated in the original environmental impact assessment for a project (*Barrick Australia Ltd v Williams* (2009) 74 NSWLR 733, per Basten JA).
Section 4.2 of this document discusses the environmental impacts of this modification.
As discussed in section 5, this modification is expected to have limited environmental consequences beyond those envisaged in the original environmental assessment.
The Proposal is considered consistent with the previous approval (DA No. 35/98) and should be assessed as a s75W modification in accordance with the EP&A Act and *Environmental Planning and Assessment Regulation 2000*.

As this modification will be assessed under section 75W of the EP&A Act, the provisions of most environmental planning instruments do not apply. Notwithstanding this, an assessment of this modification and how it considers planning controls for the Site is provided below.

4.1.2 *Protection of the Environment Operations Act 1997*

Operations on Site are licenced under the *Protection of the Environment Operations Act 1997* (the POEO Act). The POEO Act requires environment protection licences (EPLs) for scheduled activities, including chemical production and storage, and waste storage, disposal and processing.

EPL 2148 applies on the site and covers Orica's activities in the BIP. A review of EPL 2148 indicates that this modification would not require a licence amendment to modify the location of monitoring/discharge points and areas or discharge limits and operating conditions set under the EPL, given no increase in the scale of chemical production levels or change in location for the storage tanks beyond the footprints of the existing tanks is anticipated. Should any alteration to the EPL be required this would be undertaken as appropriate post approval of this modification.

4.1.3 *State Environmental Planning Policy (Major Development) 2005*

The Site is located within the state significant site known as the Three Ports Site, and is zoned 'IN1 — General Industrial' under Part 20 of Schedule 3 of the *State Environmental Planning Policy (Major Development) 2005* (the Major Development SEPP). These zoning controls do not apply to transitional Part 3A projects (Schedule 3, Part 20, cl 6). While these controls do not apply to this modification, the modification is considered to comply with the zone objectives as discussed in Table 4.1.

Table 4.1 IN1 — General Industrial: zone objectives

Objective	How the modification satisfies the objective
To provide a wide range of industrial and warehouse land uses	The Proposal would enable the installation of new tanks compliant with relevant safety regulations and standards, and facilitate continued use of industrial land for the production at the ChlorAlkali plant.
To encourage employment opportunities	The Proposal would generate short term employment during the removal of the existing tanks and installation of the new tanks. Additionally, the Proposal would encourage ongoing employment through continued use of the ChlorAlkali plant.
To minimise any adverse effect of industry on other land uses	The Proposal would reduce risks for adverse environmental impacts from continued use of the existing degraded tanks on surrounding land uses in the local area.
To facilitate and encourage port related industries that will contribute to the growth and diversification of trade through the port	This objective is not applicable to the Proposal.
To enable development for the purposes of retailing or commercial offices only where it is associated with, and ancillary to, port related activities or ancillary to industrial use of the same land	This objective is not applicable to the Proposal.
To encourage ecologically sustainable development	This Proposal would encourage ecologically sustainable development by ensuring waste storage in the ChlorAlkali Plant is in compliance with relevant environmental, work health and safety, and dangerous goods legislation.

In summary, the modification is considered consistent with the provisions of the Major Development SEPP.

4.1.4 *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*

The *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* provides for a system of hazard and risk assessment for potentially hazardous industry. A preliminary hazard analysis (PHA) may be required under this policy and its accompanying guidelines, including *Hazardous and Offensive Development Application Guidelines: Applying SEPP 33* ('*Applying SEPP 33*').

Applying SEPP 33 (p 12) indicates a PHA may be required for a modification where:

- *the modification [is] considered potentially hazardous or potentially offensive in [its] own right, or*
- *the proposed modification [is] not potentially hazardous in [of itself], but interact[s] with the existing facility in such a way that cumulative hazards (or offence) from the existing facility may be significantly increased.*

This Proposal is intended to upgrade the safety and environmental performance of liquid caustic soda storage on site. The staging of the Proposal will facilitate the safe decommissioning and removal of the existing tanks, while allowing continued use of the ChlorAlkali Plant (approved in DA No. 35/98). Once the construction work for the Proposal is complete, all liquid caustic soda storage will be in accordance with relevant work health and safety and dangerous goods regulations, standards and guidelines. Ultimately, the Proposal is intended to minimise risks associated with storage of liquid caustic soda on Site.

As such, preparation of a separate PHA is not considered to be necessary for this modification in accordance with *State Environmental Planning Policy No 33—Hazardous and Offensive Development* and *Applying SEPP 33*.

4.1.5 *State Environmental Planning Policy No. 55 – Remediation of Land*

The Proposal could potentially require the remediation of contaminated land under *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55).

As is discussed in section 4.2.3, soil testing will be undertaken to establish if soil contamination is present under and around existing Tanks 3 and 4 once removed. In the event that remediation work is required on site, this work would be carried out as part of the Proposal, (rather than as separate Category 2 remediation work) and would be completed in accordance with the contaminated land planning guidelines and any guidelines in force under the *Contaminated Land Management Act 1997*.

4.2 Environmental impacts

4.2.1 Noise and vibration

Construction noise

The Proposal may result in noise impacts to surrounding land uses/receivers for the duration of the construction period (November 2012 to September 2013).

In general, it is anticipated that the majority of sensitive receivers located in close proximity to the construction works would experience a temporary increase in noise levels, particularly during construction works (such as mechanical cutting of the existing storage tanks during demolition works). However, given the temporary nature of the proposed construction works, the small number of construction vehicles/equipment required and the existing noise environment (which is already influenced by road traffic noise from the surrounding road network and industrial activities occurring within the Botany Industrial Park), noise impacts are anticipated to be manageable on site through the application of standard noise mitigation measures. These measures would include the following:

- Works would be undertaken during standard day time construction hours of 7 am-6 pm Monday to Friday and 8 am-1 pm Saturdays. No work would occur on Sundays or public holidays without prior approval.
- The duration of noise-intensive activities would be minimised as far as possible. This could include the application of respite periods during noise-intensive works.
- Noise-generating plant would be oriented away from sensitive receivers, where possible.
- Engines would be turned off when vehicle or equipment is not in use.
- Workers would keep noise to a minimum (e.g. avoiding dropping tools/materials from height), where possible.

The implementation of these mitigation measures is expected to ensure that there are no unreasonable adverse noise impacts on surrounding receivers.

Construction vibration

The construction works included in the Proposal have the potential to result in vibration on the immediate surrounding area. It is anticipated that construction vibration levels at sensitive receivers would comply with structural damage criteria; however, vibration may be perceivable in areas located immediately adjacent to the construction site. As outlined in section 2, one non-indigenous heritage item (a 2-storey brick administration building) is known to be located in the vicinity of the Proposal. It is anticipated that ground-borne vibration levels at the administration building would comply with relevant objectives for potential structural damage as vibration intensive plant/equipment is unlikely to be permitted to operate in close proximity to the ChlorAlkali Plant (in accordance with Orica requirements). Notwithstanding this, safe working distances would be adopted for any vibration intensive equipment that is proposed to be used on site to minimise or prevent vibration impacts to sensitive structures and land uses (which includes the heritage listed administration building).

4.2.2 Traffic, transport and access

To enable the transport of construction materials and waste to/from the site, the Proposal would generate up to 70 truck and light vehicle movements (approximately 3 truck movements and 8 light vehicle movements per day) in 2012, and up to 60 truck and light movements (approximately 2 truck movements and 8 light vehicle movements per day) in 2013. All construction traffic would enter and exit the site via Denison Street, Matraville. Sufficient car parking space would be available on-site for traffic generated by the Proposal.

Without mitigation measures in place, the increase in vehicle traffic that is likely to occur as a result of the Proposal may impact upon the existing road network at Denison Street and Beauchamp Road. A number of mitigation measures are proposed for the Proposal, including:

- limiting construction personnel vehicle movements to outside AM and PM peak times on Beauchamp Road and Denison Street
- staggering vehicle movements to and from site to minimise impacts on intersection performance
- encouraging construction personnel to carpool where possible.

When implemented, these mitigation measures would minimise impacts upon traffic network performance.

4.2.3 Contaminated land

Current and former land uses have the potential to result in contaminated soils in the vicinity of the Site, in particular under Tanks 3 and 4. Whilst there is no known land contamination on-site, Orica would investigate land contamination by undertaking soil testing subsequent to the removal of Tanks 3 and 4.

Any remediation work required as part of the Proposal would be conducted and supervised by licenced contaminated land management contractors. All remediation work would be treated and managed in accordance with the provisions of SEPP 55, as discussed in section 4.1.4, and Orica on-site standards and protocols.

4.2.4 Waste management

It is anticipated that the Proposal would generate approximately 320 tonnes of general construction waste (primarily steel from the decommissioned tanks), as well as mercury-contaminated sludge and up to 750 tonnes of soil. Waste would be temporarily stored in covered skip bins on the Site adjacent to Tanks 3 and 4 prior to being sorted, and removed from the Site. All construction waste that potentially contains hazardous materials would be inspected prior to disposal. Construction works requiring the handling and/or removal of mercury-contaminated materials (including sludge and wastewater from Tank 4) would be undertaken by a suitably licenced contractor on-site in accordance with relevant standards and guidelines, and Orica's existing waste management protocols and policies.

General construction waste would be temporarily stored on a vacant parcel of land situated adjacent to Tanks 3 and 4 (owned by Orica) prior to being removed by a licenced waste contractor for offsite disposal. All liquid wastes would be processed onsite. All waste generated by the Proposal would be classified in accordance with the NSW DECCW *Waste Classification Guidelines* (2009) prior to disposal.

4.2.5 Hazards and risks

The modification would facilitate for the continued onsite storage of liquid caustic soda in tanks connected to the ChlorAlkali Plant (DA 35/98). These activities were previously assessed as part of Development Consent DA 35/98. This modification is considered unlikely to pose additional hazards and risks in excess of those previously assessed.

As discussed in section 4.1.3, preparation of a separate PHA is not considered to be necessary for this modification. Hazards and risks that may arise from the modification would be managed in accordance with existing site controls, and a Construction Environmental Management Plan (CEMP) that would be prepared for the construction of the proposed works.

4.2.6 Heritage

As outlined in section 2, one non-indigenous heritage item is known to be located in the vicinity of the Proposal. This item comprises an existing 2-storey administration building that is listed in Schedule 3 of the *Botany Local Environmental Plan 1995* (Botany LEP) as being of 'local heritage significance'. The building is not listed on the State Heritage Register, the National Heritage Register, the Commonwealth Heritage Register, the Register of the National Estate, or the heritage register of the National Trust (NSW).

The administration building would not be directly impacted by the Proposal. As outlined in section 4.2.1, it is anticipated that construction noise and vibration levels would not cause harm to this heritage item with implementation of standard noise mitigation measures and safe working distances.

4.2.7 Visual impact

Visual inspection of the Site indicates that the potential visual impacts from the Proposal would be substantially reduced from that of the existing tanks.

The new Tanks 1 and 2 would be visible from the immediate surrounds of the ChlorAlkali Plant within the BIP. The new Tanks 1 and 2 would also be visible offsite from Beauchamp Road; however, given these tanks would be smaller than the existing tanks, existing offsite visual impacts would be reduced. Offsite views would be partially obscured by a number of adjacent trees and onsite sporting facilities, including tennis courts. Views of the new tanks would also be limited from the administration building, due to tree cover and the orientation of the building.

In summary, visual impacts from the Proposal are considered to be negligible or positive given the existing industrial nature of the Site and surrounds and that offsite views of tanks would be a reduction from existing visual impacts from the existing tanks on Site.

4.2.8 Site operations and management

Before construction works begin, Orica would prepare a Construction Environmental Management Plan (CEMP) for the modification. This CEMP would include relevant details of construction methodology and key mitigation measures proposed above including:

- limiting works to designated construction hours
- inspection of all construction waste potentially containing hazardous materials
- ensuring standard noise mitigation measures and safe working distances for vibration effects are followed
- ensuring all waste is disposed of by licenced waste contractors
- ensuring construction personnel comply with traffic mitigation measures
- community and stakeholder engagement.

The CEMP would designate an environmental officer on site to monitor implementation of these mitigation measures and ensure that there are not any adverse impacts to the environment during construction.

4.2.9 Public interest

As discussed, the impacts of the Proposal would be minor or negligible and in most cases be confined to the Site. Orica currently holds periodic community information sessions to inform the public, in particular surrounding land users, of operations (existing and proposed) on the BIP.

Orica will provide an overview of this proposal at the February meeting of the Community Participation and Review Committee (CPRC) and, subject to approval, continue to provide updates to that Committee as the project proceeds. The project will also be noted at the first meeting of the BIP Community Consultative Committee, to be scheduled in April 2012.

5. Conclusion

The Proposal consists of the decommissioning, demolition and removal of four existing storage tanks (Existing Tanks 1 and 2 and tanks 3 and 4) and the installation of two new storage tanks (New Tanks 1 and 2) for the ongoing use of the ChlorAlkali Plant at Botany Industrial Park, Matraville (the Site). A modification to the ChlorAlkali Plant (DA 35/98), under s75W of the EP&A Act, is proposed to seek consent for these works.

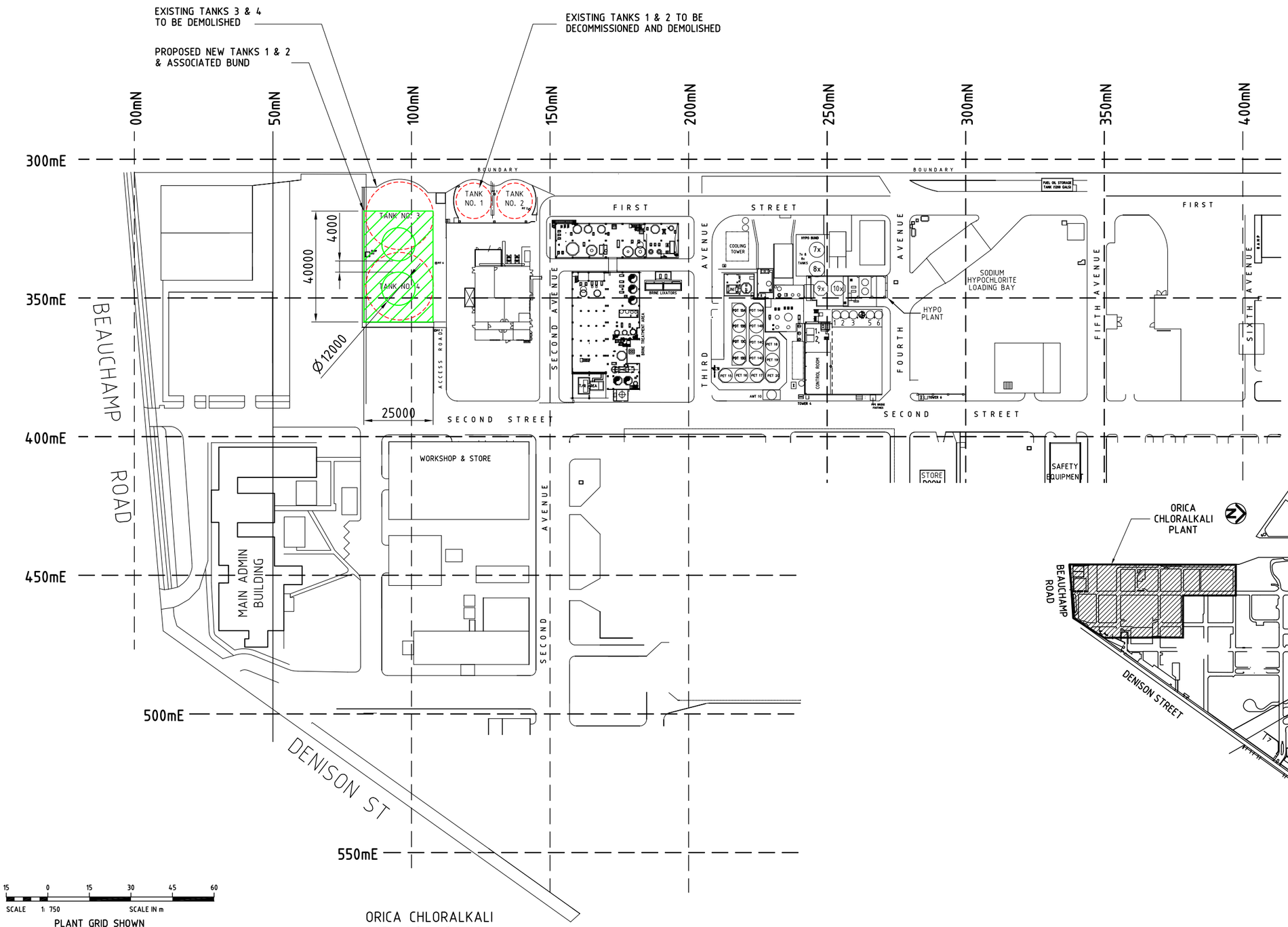
The Proposal is considered consistent with all relevant planning and environmental legislation and will result in minor or negligible environmental impacts that will be confined to the Site. As a result of this limited environmental impact, the Proposal is considered consistent with the previous development consent (DA No 35/98).

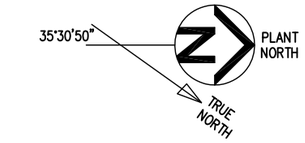
Having regard to this assessment, it is therefore recommended that approval is granted to the modification of Development Consent DA No 35/98 (as amended) as described in section 3.2 of this report.

Appendix A

Chlorine Plant Caustic Tank Upgrade — Plans

Prepared by Kellogg Brown & Root Pty Ltd





LEGEND:

DENOTES NEW WORKS

DENOTES EXISTING EQUIPMENT TO BE DEMOLISHED

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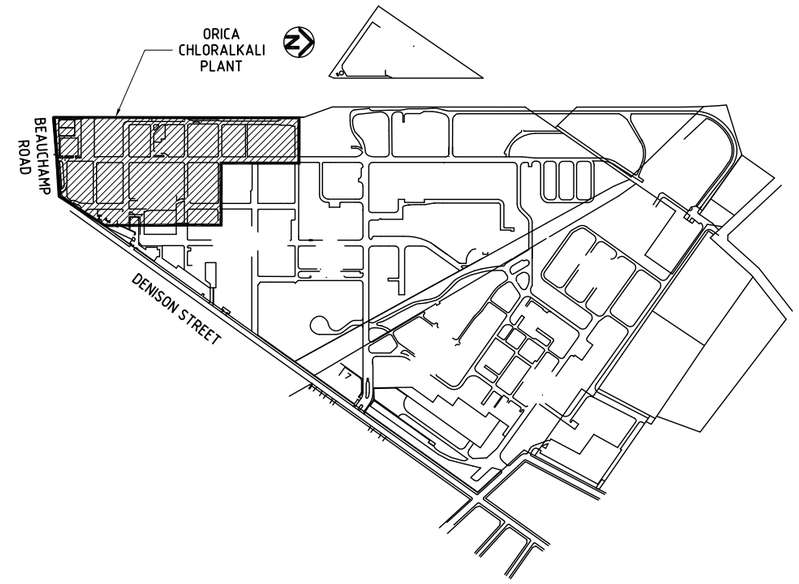
PLANT GRID SHOWN

ORICA CHLORALKALI PLANT - PLAN



LOCATION GUIDE

(NOT TO SCALE)

REV.	RES. No.	MOD. No.	REVISION DESCRIPTION	DRAWN	CHECKED	PASSED	APPROVED	DATE
A	SB1105-001	-	FOR INFORMATION	S.GILCHRIST	H.ROBINSON	R.ANDERSON	N.WAKELY	21/12/11

REVISIONS AND APPROVALS

DRG. No.	DRG. TITLE

REFERENCE DRAWINGS

Kellogg Brown & Root Pty Ltd
KBR
Kellogg Brown & Root Pty Ltd ABN 91 007 660 317

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DESIGNER	-	
DESIGN CHECKER	-	
DRAFTING CHECKER	H.ROBINSON	16/12/11
PROJECT DRAFTER	-	
DESIGN APPROVAL	-	
TECHNICAL APPROVAL	-	
PROJECT APPROVAL	R.ANDERSON	21/12/11
CLIENT APPROVAL	N.WAKELY	21/12/11

WORKS: BOTANY

PLANT: CHLORINE

SECTION: SITE

RES/PROJECT No.: SB1105

SCALES: 1:750

ORICA Australia Pty Ltd (ACN. 004 989 093)

TITLE: CHLORINE PLANT CAUSTIC TANK UPGRADE LOCATION PLAN

PLANT	SEC	SUB	DRAWING No.	REV
B201	22	03	B102484	A

CAD DRAWING DO NOT MANUALLY REVISE THIS DRAWING

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