

Mr Mark Jarvis
Senior Project Manager - Water Treatment Systems
Ixom Pty Ltd
Level 10, 1 Nicholson Street
East Melbourne VIC 3002

OBJ16/11729
DA 35/98 MOD 5

Dear Mr Jarvis

**Chlor-Alkali Plant, Matraville
Secretary's Environmental Assessment Requirements (SEARs)
DA 35/98 MOD 5**

I refer to your email dated 8 November 2017, seeking an extension to the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department on 22 December 2016. These SEARs were for the preparation of an Environmental Assessment (EA) supporting a modification request to the Minister's consent for the Chlor-Alkali Plant (DA 35/98). This request would be assessed under section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Department understands the modification request proposes the construction of a packaging facility to enable the site to package selected chemicals into 200 litre drums, and 1,000 litre Intermediate Bulk Containers (IBCs). It is noted this proposal has been revised slightly since the Department's original letter, with the packaging facility having been relocated from Block M to Block A at the site.

In conjunction with the Department's original letter, you must ensure that the EA supporting the modification request includes the following:

- **Details of the existing operations on the site**, including:
 - existing and approved operations/facilities, including any statutory approvals that apply to these
 - a summary of the existing conditions of consent that would be relevant to the proposal
 - a summary of the existing environmental management and monitoring regime
- **Description of the modification** including plans of any proposed works
- **Need and justification for the modification**
- **Identification of conditions to be modified**
- **Other approvals** – identification of any proposed variations to other licences and approvals including the current Environment Protection Licence and *Environmentally Hazardous Chemicals Act (1985)* Licence
- **Identification of the potential environmental impacts of the modification** – including a more detailed assessment of the key issues identified below
- **Hazards and Risks**, including:
 1. a preliminary risk screening carried out in accordance with *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development* and Applying SEPP 33 (DoP, 2011), with a clear indication of class (including the subsidiary risk), quantity, package size, and location of all dangerous goods and hazardous materials associated with the proposed modification
 2. should the preliminary risk screening indicate that the proposed modification is "potentially

hazardous", a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011), and Multi-Level Risk Assessment (DoP, 2011). The PHA must:

- identify the hazards associated with the proposed modification to determine the potential for off-site impacts
 - estimate the risks from the proposed modification and the cumulative risks from the existing facility and the proposed modification
 - demonstrate that the proposed modification complies with the criteria set out in Hazardous Industry Planning Advisory Paper No 4 - Risk Criteria for Land Use Safety Planning and
 - demonstrate that the proposed modification does not increase the cumulative risk of the Botany Industry Park (BIP) to unacceptable levels
3. evaluate the impacts (if any) from the modification on the overall risks from transport of Dangerous Goods on Denison Street
- **Air Quality** – including details of any emissions and control measures
 - **Traffic and Transport** - including details of traffic types, volumes and haul routes and details of internal road layout, and parking
 - **Stormwater** - proposed stormwater management and onsite bunding and
 - **Construction and Operational Noise** - potential operational and construction noise impacts including details of noise mitigation and monitoring (if necessary).

The Department strongly recommends you consult with other relevant government agencies and the community in preparing the EA including, but not limited to, Safework NSW, Bayside Council, the Environment Protection Authority and community groups associated with the BIP.

Following lodgement of the modification request, the Department will advise you of the applicable fee (under Division 1A, Part 15 of the *Environmental Planning and Assessment Regulation 2000*).

Should you have any further enquiries, please contact Melissa Prochazka, Planning Services, at the Department on the details above.

Yours sincerely


Chris Ritchie 11/12/17
Director
Industry Assessments
as delegate of the Secretary