

From: Farooq Sharif <Farooq.Sharif@safework.nsw.gov.au>
Sent: Tuesday, 23 September 2025 4:27 PM
To: Nick Hon <Nicholas.Hon@planning.nsw.gov.au>; Doris Yau <doris.yau@planning.nsw.gov.au>
Cc: Troy Stephens <Troy.Stephens@safework.nsw.gov.au>
Subject: RE: MDA-2025/171: 96A Denison Street, Hillsdale

Hi Nick and Doris,

With regards to the IXOM Chlorine Liquefaction Plant Modification, the below mentioned points should be evaluated and verified in the detail design

1. Liquefaction Building Scrubber design to ensure and verify that scrubber will work even with containment building normal ventilation working (ventilation not shutdown on demand), the claim made in APPENDIX F (Event Tree) of QRA
2. Evaluation of sensitivity of leakages in the building to performance of Liquefaction Building Scrubber
3. Design to incorporate measures to identify any leakages in the building with appropriate alarms and response
4. Relevant studies to be conducted to thoroughly investigate the claims of availability and effectiveness of entire Liquefaction Scrubber System elements (SIL, Fault Tree, Event Tree etc.)

Mentioned below are the Proposed Conditions of Consent for the modification

1. All chlorine inventory to be stored inside Chlorine Liquefaction Building for all modes of operation
2. IXOM will ensure that quantity of chemicals required for Liquefaction Building Scrubber is always maintained at site to treat worst case chlorine leakage
3. IXOM will ensure that required capacity is always available at site to store the chemicals that are produced Liquefaction Building Scrubber operation for worst case chlorine leakage scenario
4. During operation one chlorine tank will remain empty and standby to accommodate any chlorine storage tank leak
5. The Chlorine liquefaction system, building, ventilation, and scrubber is designed minimum to the standards of "AS 2927, The storage and handling of liquefied chlorine gas".
6. Liquefaction Building Scrubber will be installed with necessary instrumentation to evaluate the performance of scrubber against design at any time, including but not limited to chlorine monitor in the scrubber exhaust stream
7. Controls measures, performance indicators and performance standards developed for entire scope of modification and integrated with Safety Management System before commissioning of the modification

Regards,

Farooq Sharif
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Authorisations & Verifications
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