



Industry Assessments

Contact: Melissa Prochazka

Phone: (02) 8289 6695

Email: melissa.prochazka@planning.nsw.gov.au

Mr Richard Benbow
Principal Consultant
Benbow Environmental
PO Box 687
PARRAMATTA NSW 2124

DOC17/622723
DA 367-11-2002-i MOD 3

Email: admin@benbowenviro.com.au

Dear Mr Benbow

**Redox Chemical Warehouse, Minto (DA 367-11-2002-i MOD 3)
Environmental Assessment Requirements (EARs)**

I refer to your modification request seeking to modify the Minister's approval for the Redox Chemical Warehouse, Minto (DA 367-11-2002-i) under section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In accordance with section 75W(3) of the EP&A Act, the Secretary may notify the Proponent of environmental assessment requirements (EARs) with respect to the proposed modification. The Proponent must comply with these requirements before the matter is considered by the Department. The EARs below are based on the information provided to date.

Your modification request should be accompanied by an Environmental Assessment (EA) which addresses the requirements of the Department previously provided on 26 July 2017 (refer to **Attachment A**) and 20 October 2016 (refer to **Attachment B**).

During the preparation of the EA, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EA.

Following the provision of the EA, the Department will advise you of the applicable fee (under Division 1A, Part 15 of the *Environmental Planning and Assessment Regulation 2000*) and consultation requirements.

If you have any enquiries about these requirements, please contact Melissa Prochazka on the above details.

Yours sincerely

Chris Ritchie
Director
Industry Assessments
as delegate of the Secretary

15/12/17

ATTACHMENT A
DPE comments dated 26 July 2017

It is recommended the Environmental Assessment (EA) for the Redox Chemical Facility at Minto be updated to address the Department's following comments:

General

- There needs to be a section that clearly discusses what is being requested as part of the proposed modification (preferably summary dot points). This comment relates to the fact detail relating to the modification differs between the Executive Summary, Introduction (Section 1) and generally throughout the report.
- The EA should include a background section summarising the outcome of the Commission of Inquiry and previous modifications relating to the project approval.

Construction of Stage IV

- The construction environmental management plan (CEMP) will need to be updated. The updated CEMP does not need to be included with the EA, however please provide detail in EA on what will be updated as part of the proposed construction works.

Chemical Storage

- The approved chemical storage for the site as detailed in the assessment report is 15,845 tonnes (i.e. both dangerous and non-dangerous goods). The EA incorrectly refers to approved chemical storage amount as 20,445 tonnes as detailed in the original EIS. It should be noted that this amount was reduced based on submissions and the outcome of the Commission of Inquiry.
- It is unclear whether the modification (i.e. 250 tonnes to 450 tonnes for Stage IV) proposes to increase the approved Class 8 Bulk (Corrosive) storage for the entire site or the difference would be taken from the Class 8 approved bulk and corrosive storage amount (see Page 3-16). Please advise accordingly.
- Further justification for the proposed change of 205 litre drums to intermediate bulk containers for the storage of Class 3 flammable liquid and 6.1 toxic substances is required.

Operational issues

- Further detail relating to the proposed wastewater treatment plant and demineralisation or reverse osmosis plant is required (see Section 3.1.3).
- Further information relating to the construction of the proposed three air scrubbers and locations within the Stage IV area of the facility (see Section 3.1.3).
- Page 3-18 notes the following: "*Diluting of some corrosives is exothermic reaction and it will release heat, which should be transferred away from the tank*". The EA suggests that a heat exchanger will be used, please provide further detail on this new equipment.
- Further information is required relating to the debagging and dry product mixing process (see Section 3.1.3). Including detail relating to the use a reverse pulse dust collector at the site.

Traffic Management

- Please justify why there is no proposed increase of truck movements taking into consideration the aspects of the proposed modification (see comment in the Executive Summary).
- Further justification in the body of the EA relating to the proposed modification to the approved truck route. The only detail relating to the proposed modification is the following comment in the Concluding Remarks section: "*Allow for a greater freedom in the transport*

routes as a result of significant changes that have occurred to the arterial roadway system. A new M31 Motorway access ramp was constructed from Raby Road. The truck routes should now be altered as detailed in Section 5.3 of the Transport and Urban Planning Traffic Assessment in order to significantly reduce the truck impacts on local roads, confine trucks to the classified road network which has the traffic and structural capacity to accommodate trucks and to reduce noise and air pollution in the surrounding area".

ATTACHMENT B
DPE comments dated 20 October 2016

General comments

With regards to the application please make the following amendments:

- The modification request is to be made under section 75W of the EP&A Act. The report submitted with your request should be referred to as an Environmental Assessment (EA), and refer to section 75W throughout (particularly Section 2.1).
- Figure 2-1 should be updated to include labels which identify surrounding developments (as described in Section 2.1.2.2).
- Figure 3-5 *Site Plan* should be updated to improve its legibility, and a site plan indicating the types of Dangerous Goods (DG) to be stored in each warehouse/area should also be provided.
- Specific storage locations for the Dangerous Goods and other materials within each Warehouses on site is not provided. The EA should include a DG site plan for both the existing site and for the revised DG site plan which forms part of the modification request.
- A detailed description of the existing or ongoing operations which includes current employment details/workforce and photographs of the existing operations.
- A detailed description of the need and justification for the modification, having regard to its location and potential environmental impacts.

Hazards and Risks

The information provided in the documents listed below is not sufficient to fully understand the proposed modification and the extent of the requested changes:

- The relevant sections of the draft Statement of Environmental Effects (SEE) (Ref 148292_SEE_REV4, prepared by Benbow Environment and dated 16/9/2016) and
- FSS (Ref 148292_FSS_REV3, prepared by Benbow Environment and dated 30/8/2016), enclosed as Attachment 4 of the SEE.

In order to understand the proposed modifications, please clarify:

- the quantities and types of DG **as currently approved** and
- the operations and equipment/plants associated **as currently approved**.

This information is vital to clearly define the scope of the current modification and will limit the number of enquiries during the detailed assessment of the modification. (For example, the current SEE does not clarify why the hazards related to the water treatment plant are not included in the hazard identification.)

In addition, it is requested you address the following to clearly identify the scope and extent of the proposed changes:

- The *Executive Summary* of the SEE refers to a request for changes of the storage of some DGs, including DG Class 6.1. The quantities to be increased are not stated, nor included in the Hazard Analysis.
- Sec.3.1.2 states that an ample clear space exists around Buildings B1/B2 for storage of flammable materials. Is this outdoor storage of Class 3.1 forms part of the requested modification or it has been approved as part of the original approval?
- Are any other operations apart from diluting and mixing proposed as part of the modification? (The SEE refers to blending operations and blending tanks. However, no details are provided on the blending operations and the materials involved in these operations.)

- It is not clear if the information provided on p. 3-6 and 3-7 relates to food grade process only or to whole building F (including alkali and acid filling).

The following issues should be also addressed:

- The SEE states (p. 3-6) that the bund may be shared of alkali and acids as they are compatible. It is noted that some alkali and acids are not compatible and a toxic gas may be produced if they are accidentally mixed (for example hypochlorite solution and sulphuric acid). It does not appear this issue to be considered in the analysis.
- The SEE does not provide information on the maximum quantities of each DG class to be stored at the facility as a whole at any time, nor the quantity of the DGs related to the modification.

The PHA has estimated the consequences of some of the potential accidents and also identified safeguards to minimise the likelihood of the event occurring. The conclusion of the PHA that due to the proposed safeguards the off-site risks are prevented from occurring is highly optimistic. The Department notes, that the safeguards are important element of the risk management and they will reduce the likelihood of an accident. However, it is highly unlikely to eliminate the risk unless the hazard itself is removed (i.e. the storage and handling of DGs on site).

The cumulative risks from the existing site and the modification are not discussed and/or analysed. It should be noted that the PHA should demonstrate that the facility, as modified, will not impose unacceptable risks to the surrounding land uses.

Traffic and transport

- The modification request should indicate whether it is proposing to change the approved number of vehicle trips as part of Stage 4. The EA should also indicate whether the additional traffic for Stage 4 has already been assessed and approved.
- The EA should clarify whether it seeks to modify the approved vehicle types (i.e. types and numbers of trucks/heavy vehicles).
- Section 3.3 of the EA should include maps of both the approved and proposed vehicle routes.

Waste

- The EA should indicate if the wastewater treatment plant has already been approved, or if the modification request is seeking to construct a new wastewater plant to process waste at the site.
- Should a new treatment plant be proposed, the EA should detail where this plant would be located, whether it will result in any operational impacts (such as odour) and how these would be managed/mitigated.