Qenos Port Botany LPG Tank Demolition Proposal – DA6329

Responses to Submissions

(1) Responses to NSW Ports submission:

(a) Responses to address the Port Botany Development Code October 2013 and the Green Port Checklist October 2013 are attached in the documents:

a. PBDC Checklist - Qenos LPG Tank Demolition Project

b. NSW Ports Green Port Checklist - Qenos LPG Tank Demolition Project

(b) In response to the statement

> "It should be noted that ship numbers will continue to increase at Port Botany into the future; including at the Bulk Liquids Berth facilities. In addition, NSW Ports notes that while the Qenos Hydrocarbon Terminal will no longer import propane or butane, the Bulk Liquid Berth facilities at Port Botany can continue to accommodate the importation of such products."

Qenos accepts that the Bulk Liquids Berth can and will continue to operate and accommodate LPG products. The use of these facilities by Qenos will be reduced to the potential importation or export of ethylene only.

(2) Response to NSW Roads and Maritime submission:

(a) No further comment.

(3) Responses to Workcover NSW – Major Hazard Facilities Team submission:

(a) Qenos' Mr Paul Uhrig (Senior Process Risk Engineer) spoke with Mr Raghava Nayak of the Workcover NSW Major Hazard Facilities Team and forwarded an electronic information pack of the proposed development on 14th November 2013.

(b) This initial discussion identified that appropriate risk studies would be required (listed in the SEE Section 3.4.2 *Risk and Hazard* Studies) and that further clarification would be made of what if any changes would be required to the Safety Case for the facility.

(c) Qenos undertakes to continue to consult with the Workcover NSW – Major Hazard Facilities Team to identify and make changes to the Safety Case for the facility.

(d) Qenos will carry out the proposed changes in accordance with the safety management system outlined in the Qenos Hydrocarbon Terminals Safety Report (Section 5) submitted 25 Feb 2012 – the Safety Health Environment Operating System (SHEOS) – which is intended to ensure compliance with applicable legislation including the Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011. The specific elements of Qenos SHEOS listed below are relevant to the proposal:

a. Control of Change (Safety Health Environment Operating Practice 7.1 – *SHEOP 7.1*) – This practice outlines how changes are controlled by Qenos including hazard and risk studies to be conducted, control of follow up actions arising from

such studies and final acceptance checking. A range of hazard and risk studies have been identified for the project (refer to SEE Section 3.4.2).

b. Facilities Design and Construction (*SHEOP 3.1*) – This practice outlines how Qenos facilities are developed, designed, constructed and handed over in accordance with Qenos and regulatory requirements for health, safety and the environment. Facility changes have been designed in accordance with Qenos standards and practices.

c. Risk Analysis and Assessment (*SHEOP 2.1*) – This practice outlines the management of High Potential Hazards identified for both ongoing operations and new projects. The risk assessment tools incorporated within this SHEOP will be used for the safety studies identified to be required as part of this project.

d. Work Permits (*SHEOP 6.2*) – This practice outlines how the work related to demolition and construction will be controlled via permits to ensure that jobs are planned, equipment is prepared, personnel are informed of hazards and procedures, precautions are taken and work is executed in a manner to protect safety, health, and the environment. Qenos will control all permits and process preparation for the work in accordance with established procedures under this SHEOP. Personnel working on site will be inducted and trained on Qenos' permit systems.

e. Third Party Services (*SHEOP 8.1b*) – This practice outlines the requirements of initial contractor selection, monitoring of their safe systems of work and cooperation between Qenos and the contractor to ensure continuous SHE improvement. All contractors to be used for the project will be assessed prior to and audited during the course of the work to ensure compliance with the SHEOP.

f. Emergency Preparedness (*SHEOP 10.1*) – This practice outlines the systems in place (procedures, competencies and exercise programmes) to ensure that Qenos, supporting emergency services/authorities and community are able to respond effectively to any emergency. The existing emergency management procedure for Port Botany Hydrocarbons Terminal will be applied for the project. Emergency drills will be conducted to ensure familiarity with the procedure.

(4) Responses to NSW Environment Protection Authority submission:

a. An environmental site audit of soil and groundwater was conducted during September 1999 (prepared for Sydney Ports Corporation by IT Environmental Australia Pty Ltd). This audit analysed soil samples from around the site including in the area to be vacated down to a depth of 6m below ground level. The samples were tested for TPH, BTEX, Metals, Organochlorine Pesticides and Polychlorinated Biphenyls. None of these factors were detected above the laboratory detection limits or the site assessment criteria.

b. The Qenos operations on site in the period after the audit have remained the same. The materials stored on site are in a gaseous phase at atmospheric pressure and ambient temperature so would flash to atmosphere in the event of any leakage. Additionally there has been no major maintenance on site in the area of the development and hence the potential of any other source of soil contamination is considered very low.

c. Qenos will include a Soil Management Strategy in the Construction Environmental Management Plan to manage generated spoil. Classification of soil and disposal in accordance with the waste Classification Guidelines (DECCW 2009) will be included as part of this plan.

d. Qenos will commission a Future Land Assessment following completion of demolition and a Remedial Action Plan developed from it.

e. Qenos undertakes that clean fill used will be Virgin Excavated Natural Material in accordance with the Waste Classification Guidelines (DECCW 2009).

(5) Responses to Randwick Council submission:

a. In relation to item (1): A search of the NSW EPA contaminated land register was conducted for Randwick and no sites were identified within the Port Botany area (EPA 2013). A review of the Port Botany Asbestos Register (Pickford and Ryder Consulting 2011) found no record of buried asbestos containing material and the site had no prior usage before the Terminal installation.

b. A small amount of gasket material may be non-friable asbestos. Qenos undertakes that this material will be removed and sealed according to the Code of Practice for the Safe Removal of Asbestos [NOHSC:2002(2005)] by a licenced asbestos removalist following notification to Workcover NSW, then disposed of to a licenced facility.

c. In relation to item (2): An environmental site audit of soil and groundwater was conducted during September 1999 (prepared for Sydney Ports Corporation by IT Environmental Australia Pty Ltd). This audit analysed soil samples from around the site including in the area to be vacated down to a depth of 6m below ground level. The samples were tested for TPH, BTEX, Metals, Organochlorine Pesticides and Polychlorinated Biphenyls. None of these factors were detected above the laboratory detection limits or the site assessment criteria.

d. The Qenos operations on site in the period after the audit have remained the same. The materials stored on site are in a gaseous phase at atmospheric pressure and ambient temperature so would flash to atmosphere in the event of any leakage. Additionally there has been no major maintenance on site in the area of the development and hence the potential of any other source of soil contamination is considered very low.

e. Qenos will include a Soil Management Strategy in the Construction Environmental Management Plan to manage generated spoil. Classification of soil and disposal in accordance with the waste Classification Guidelines (DECCW 2009) will be included as part of this plan.

f. Qenos will commission a Future Land Assessment following completion of demolition and a Remedial Action Plan developed from it.

g. In relation to item (3): Qenos undertakes that clean fill used will be Virgin Excavated Natural Material in accordance with the Waste Classification Guidelines (DECCW 2009).

h. In relation to item (4): Qenos will develop a Construction Environmental Management Plan incorporating elements as listed in the SEE Table 6.1.

i. In relation to item (5): Qenos will incorporate waste management measures in the Construction Environmental Management Plan to ensure it is managed and disposed of in accordance with the requirements of Workcover NSW and NSW EPA (refer to SEE Table 6.1).

j. In relation to item (6): Qenos will commission a Future Land Assessment from a suitably qualified Environmental Consultant.