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Our ref:
Your ref:

Mr Bruce Gotting
Site Environment Manager
Orica Australia Pty Ltd
16-20 Beauchamp Road
MATRAVILLE NSW 2036

Dear Mr Gotting

**Proposed Expansion and Consolidation of Hexachlorobenzene Storage Facilities,
Botany Industrial Park, Botany Bay Local Government Area**

I refer to your request for Director-General's requirements for the preparation of an Environmental Assessment in relation to the above project.

The Director-General's Environmental Assessment Requirements are attached, pursuant to section 75F(2) of the *Environmental Planning and Assessment Act 1979*. It should be noted that the Director-General's requirements have been prepared based on the information provided to date. Under section 75F(3) of the Act, the Director-General may alter or supplement these requirements if necessary and in light of any additional information that may be provided prior to the proponent seeking approval for the project.

You should ensure that you consult with the Department prior to submission of a draft Environmental Assessment to determine:

- fees applicable to the application;
- consultation and public exhibition arrangements that will apply; and
- number and format (hard-copy or CD-ROM) of the Environmental Assessments that will be required.

Once you have lodged the Environmental Assessment, the Department will consult with the relevant authorities to determine the adequacy of the Environmental Assessment. Following this review period the Environmental Assessment will be made publicly available for a minimum period of 30 days.

You should keep the contact officer for this project, Scott Jeffries ((02) 9228 6426, scott.jeffries@dipnr.nsw.gov.au), up to date with the progress of preparation of the Environmental Assessment, and seek clarification of any issues that may be unclear or may arise during this process.

Yours sincerely

Chris Wilson
A/ Deputy Director-General
As delegate for the Director-General

PROPOSED EXPANSION AND CONSOLIDATION OF HEXACHLOROBENZENE WASTE STORAGE FACILITIES, BOTANY INDUSTRIAL PARK, BOTANY BAY LOCAL GOVERNMENT AREA

ENVIRONMENTAL ASSESSMENT REQUIREMENTS UNDER PART 3A OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Project	Extension of existing hexachlorobenzene waste storage and handling facilities, including construction and operation of a new store for re-drumming equipment and for additional storage of repackaged waste.
Site	Lot 11 DP 1039919 and Lot 9 DP 1016112
Proponent	Orica Australia Pty Ltd
Date of Issue	28 December 2005
Date of Expiration	28 December 2007
General Requirements	<p>The Environmental Assessment must be prepared to a high technical and scientific standard and must include:</p> <ul style="list-style-type: none"> • an executive summary; • a description of the proposal, including construction, operation, and staging; • an assessment of the environmental impacts of the project, with particular focus on the key assessment requirements specified below; • justification for undertaking the project with consideration of the benefits and impacts of the proposal; • a draft Statement of Commitments detailing measures for environmental mitigation, management and monitoring for the project; and • certification by the author of the Environment Assessment that the information contained in the Assessment is neither false nor misleading.
Key Assessment Requirements	<p>The Environmental Assessment must include assessment of the following key issues:</p> <ul style="list-style-type: none"> • Strategic Planning – the Environmental Assessment must provide a strategic assessment of the project, including justification of the need, scale, scope and location for the project with respect to longer-term strategies for the removal/ destruction of hexachlorobenzene waste. The Environmental Assessment must also include a strategic planning consideration of the project and an analysis of the suitability of the proposed site with respect to potential future transport options for removal of the waste from the site. • Statutory and Other Requirements – the Environmental Assessment must demonstrate that the project is consistent with <i>Scheduled Chemical Wastes Chemical Control Order 2004</i>, the existing licence for the site under the <i>Environmentally Hazardous Chemicals Act 1985</i> and the outcomes and requirements of the HCB Waste Management Plan (ANZECC, 1996) • Land Use Safety Planning – the Environmental Assessment must include a Preliminary Hazard Analysis, prepared in accordance with <i>Multi-Level Risk Assessment</i> (DUAP, 1997) and <i>Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis</i> (DUAP, 1997). The Analysis must focus on risks associated with the transport and handling of wastes within the site, decontamination and demolition of structures, and potential incidents associated with new storage and handling areas that may generate an off-site risk impact. The Analysis must also consider risks associated with the project in the context of cumulative risks in the area. Specific reference must also be made to the worst-case incident scenarios presented in <i>Independent Review – HCB Waste Destruction</i> (Independent Review Panel, July 2004) and demonstrate that these potential scenarios have been taken into account and mitigated as part of the Preliminary Hazard Analysis. • Human Health Impact Assessment – the Environmental Assessment must include an assessment of the potential impacts of the project on human health, particularly that of nearby residents, both as a result of acute and chronic exposures, and in the context of carcinogenic and non-carcinogenic health effects. The human health impact assessment must be prepared in accordance with the enHealth risk assessment guidelines and specifically include:

	<p>characterisation of current exposure of residents to key chemicals via various media pathways during transport and redrumming processes; determination of any modelled incremental risk from the new transport and repackaging arrangements; and analysis of whether this risk is acceptable based on Australian tolerable daily intake (TDI) values, or World Health Organisation guidelines, or other relevant and justified guidelines if Australian TDI or WHO values do not exist.</p> <ul style="list-style-type: none"> • Air Quality – the Environmental Assessment must include an appropriate level of air quality impact assessment prepared in accordance with the <i>Approved Methods for Modelling and Assessment of Air Pollutants in NSW</i> (EPA, 2001), with particular focus on any point source or fugitive emissions that may be generated by storage, handling and redrumming activities. • Waste Management – the Environmental Assessment must assess include details of all wastes that may be generated as a consequence of the project, including drum demolition waste, with an indication of likely quantities of these wastes, proposed disposal destinations and management practices for safe handling and disposal of those materials. • General Environmental Risk Analysis – notwithstanding the above key assessment requirements, the Environmental Assessment must include an environmental risk analysis to identify potential environmental impacts associated with the project (construction and operation), proposed mitigation measures and potentially significant residual environmental impacts after the application of proposed mitigation measures. Where additional key environmental impacts are identified through this environmental risk analysis, an appropriately detailed impact assessment of these additional key environmental impacts must be included in the Environmental Assessment.
Consultation Requirements	<p>You must undertake an appropriate and justified level of consultation with the following parties during the preparation of the Environmental Assessment:</p> <ul style="list-style-type: none"> • Commonwealth Department of Environment and Heritage; • NSW Department of Environment and Conservation; • NSW Department of Health; • The Council of the City of Botany Bay; • the HCB Community Participation and Review Committee; and • the local community. <p>The Environmental Assessment must clearly indicate issues raised by stakeholders during consultation, and how those matters have been addressed in the Environmental Assessment.</p>
Deemed refusal period	<p>Under clause 8E(2) of the <i>Environmental Planning and Assessment Regulation 2000</i>, the applicable deemed refusal period is 60 days from the end of the proponent's environmental assessment period for the project.</p>