

Botany Operations

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13 October 2005

Mr Scott Jeffries  
Office of Sustainable Development Assessments and Approvals  
Department of Planning  
23-33 Bridge Street  
(GPO Box 39)  
SYDNEY NSW 2000

Dear Scott,

**Extension of HCB Facilities – Outline of Proposal under Part 3A of the EP&A Act**  
**Ref: EN2352**

Further to my recent discussion with Chris Wilson from the Department of Planning, I write to seek the Department's confirmation that proposed works to extend the HCB facilities at Orica's Botany Site are to be assessed under the new Part 3A of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

**Background**

As is on the public record, Orica has approximately 10,000 tonnes of concentrated HCB waste stored in over 50,000 drums at the Botany Industrial Park (BIP) in purpose-built facilities.

Orica has an ongoing annual programme of re-packaging any deteriorating drums of HCB waste into new drums. This process generates waste in the form of crushed drums, crushed pallets and Personal Protective Equipment (PPE). Orica now has an additional approximately 2,000 tonnes of low level waste in stores on site from the above and other site activities such as excavation, concrete demolition and cleaning sludge from pits.

**Proposed Works**

Orica proposes to automate the re-drumming process, which is currently done manually, and to build a new Store 'J' for the re-drumming equipment and for additional storage of the repackaged waste.

Attached is a layout and location plan for the proposed store, about 25% of which will be devoted to the new re-drumming equipment.

At this stage it is envisaged that there will be:

- 2 re-drumming lines for high level waste, feeding waste into drums; and
- 1 shredding line to process the old drums and pallets and other low level waste and feed it into 1 m<sup>3</sup> 'bulkiboxes'.

Attached are concept drawings of the proposed equipment.

The balance of the plant within Store 'J' would consist largely of conveying equipment. This equipment would receive the old drums, feed them to the processing machinery and then convey the newly filled drums into the 'clean' side of the store. A new vapour extraction system would be installed to keep the working environment clean.

### **Proposal Context**

As the Department is aware, Orica has been unsuccessful in obtaining approval for treating the waste at its Botany site and has been directed to locate a remote NSW site for treatment of the waste. Transport of the waste will require all waste to be repackaged. This automation and store extension project is required to be implemented for repackaging of the waste in containers suitable for transport as follows:

- if a remote site in NSW is available for the construction of a treatment plant, the waste on site needs to be repackaged into containers suitable for dangerous goods transport, not just on-site storage;
- Orica has stated that it will apply to export waste to a European treatment plant if a new local site cannot be found. Repackaging will be required if this option is pursued; and
- if there is delay in approval for treatment, and extended storage of HCB at Botany continues, Orica requires improvement to the packaging process to improve industrial hygiene practices during repackaging. The works are also required to improve re-drumming operations through automation and the extra storage will be required to accommodate old drums and pallets and PPE generated from re-drumming.

### **Proposed Timing**

In order to accommodate the above 3 options, Orica needs to start construction of the new facility early in 2006 so the facilities are in place before the next re-drumming campaign and to meet the anticipated timing and packaging requirements of any remote Orica or overseas treatment plant.

Given this time-line, Orica seeks to have approval to proceed with the proposed works by December 2005.

### **Planning Process**

We regard the proposal as a very simple enhancement to our existing operations and would not expect a complicated or prolonged approval process.

Orica recommends that this proposal be determined under the new Part 3A of the EP&A Act. The proposed works are captured by Part 3A in the following ways:

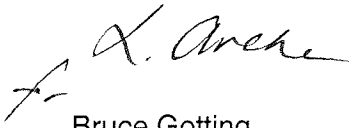
- **State Environmental Planning Policy (Major Projects) 2005, Schedule 1, Group 9, Section 27 Resource Recovery or Waste Facilities, Part 5.** The proposal is considered to be "Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste."
- **State Environmental Planning Policy (Major Projects) 2005, Schedule 2, Section 7 Port and Employment Related Lands, Part 1(b).** The proposal is considered to be "a facility that manufactures, stores or uses significant quantities of dangerous goods and meets the criteria in State Environmental Planning Policy No 33—Hazardous and Offensive Development of being potentially hazardous".

To progress project planning and work toward commencing construction in early 2006, Orica seeks to hold a Planning Focus Meeting (PFM) as soon as possible. We suggest that the PFM be attended by representatives from the Department of Planning, the Department of Environment and Conservation, the Department of Health, the City of Botany Bay Council and community representatives.

The PFM would enable Orica and the agencies to confirm the key issues and for Orica to commence preparation of an Environmental Assessment and Draft Statement of Commitments.

I would be most grateful if you could confirm that the proposed automation and store extension project is, in the opinion of the Minister for Planning, to be determined under Part 3A of the EP&A Act. Please contact the undersigned on 9352 2344 should you wish to discuss the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to read "B. Gotting", with a stylized flourish at the end.

Bruce Gotting  
Site Environment Manger