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31 Kinghorne Street  
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**Attention: Stephen Richardson**

**Subject: WWTP Tank SEPP 33 Analysis**

Dear Stephen,

I have completed a SEPP 33 analysis on the 25 m diameter, 7.6 m high water tank at the Manildra (Shoalhaven Starches) Waste Water Treatment Plant (WWTP). I understand that this tank is proposed to have anaerobic digestion within it and therefore can contain methane. This is a Dangerous Good Class 2.1.

The maximum volume of the gas in the tank is when it is close to empty, i.e. approximately 3,730 m<sup>3</sup>.

Even assuming this is 100% methane (it will not be; there will be other gases such as carbon dioxide), then the maximum methane quantity is approximately 2.5 te.

Using Figure 6 in SEPP 33, the tank needs to be approximately 90 m or less to other users for it to be deemed potentially hazardous. The tank is 185 m from Bolong Road so the tank is not deemed to be potentially hazardous and a PHA is not required.

Yours sincerely,



**Dean Shewring**  
**Principal Risk Consultant**