

# Orica Ammonium Nitrate Expansion Project Modification 5

State Significant Development Modification Assessment (08 0129-Mod-5)

October 2021



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# **Glossary**

Abbreviation	Definition			
AQIA	Air Quality Impact Assessment			
AN	Ammonium Nitrate			
Applicant	Orica Australia Pty Ltd			
BDAR	Biodiversity Development Assessment Report			
СЕМР	Construction Environmental Management Plan			
СТМР	Construction Traffic Management Plan			
Council	City of Newcastle Council			
Department	Department of Planning, Industry and Environment (DPIE)			
EPA	Environment Protection Authority			
EP&A Act	Environmental Planning and Assessment Act 1979			
EP&A Regulation	Environmental Planning and Assessment Regulation 2000			
EP&A (ST&OP) Regulation	Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017) Regulation			
FRNSW	Fire and Rescue NSW			
Minister	Minister for Planning and Public Spaces			
NIA	Noise Impact Assessment			
Planning Secretary	Secretary of the Department of Planning, Industry and Environment			
PM10	Particulate matter of less than 10 micron in size			
RtS	Response to Submissions			
SSD	State Significant Development			
tpa	Tonnes per annum			

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### 1 Introduction

This report provides the NSW Department of Planning, Industry and Environment's (the Department's) assessment of an application to modify the State significant development (SSD) consent for the Orica Ammonium Nitrate Expansion Project (08\_0129, as modified). The modification application seeks consent to add scrubber technology to the existing prill tower and ancillary equipment, with the goal of reducing air pollutant emissions.

The existing 52 metre (m) high prill tower is used to produce a dry bulk form of the ammonium nitrate (AN) produced on the site. The tower does this through a process known as prilling, which creates a shower of hot liquid AN solution at the tower's headhouse. As the solution falls and cools, it solidifies into a small bead form of AN. Currently, the exhaust air of the process is released from 12 fans at the headhouse with minimal filtering.

Existing conditions of consent require the Applicant to report on progress to reduce emissions from the subject prill tower, with the site's Environment Protection Licence also including a pollution reduction program. This is discussed in greater detail in **Section 2.1**.

As such, the Applicant proposes to install scrubber technology to the prill tower to reduce air pollutant emissions from the site and meet existing requirements.

The application was lodged on 25 August 2021 by Orica Australia Pty Ltd (the Applicant) pursuant to section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

### 1.1 Background

The Applicant owns and operates an AN manufacturing facility at 15 Greenleaf Road on Kooragang Island in the Port of Newcastle (see **Figure 1**).

When the site first began operations in 1969, it included an ammonia plant, a nitric acid plant and an AN plant, producing around 150,000 tonnes per annum (tpa) of AN for agricultural industries. The prill tower, which is the main subject of this modification application, began operation at this time.

A second nitric acid plant and AN plant was constructed in 1989 increasing the AN production to 365,000 tpa. In 1998, a third nitric acid plant was approved by the then Minister for Urban Affairs and Planning and was completed in 2004. This increased the approved AN production from the facility to 500,000 tpa. The facility has since been expanded as part of a 2009 approval, which included upgrades to existing infrastructure and plants on the site, including effluent and stormwater management. This approval has been modified several times with some phases not yet operational. This is discussed in further detail in **Section 1.3**.

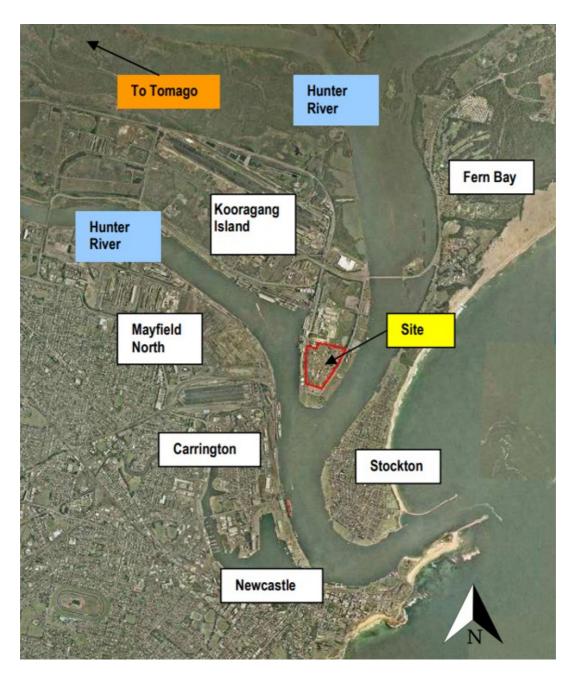


Figure 1 | Regional Context Map

### 1.2 Subject Site

The site is located on Kooragang Island, which is located between the north and south arms of the Hunter River Estuary within the Port of Newcastle. The island was originally created during the 1950s and 1960s through extensive land reclamation activities and has grown steadily ever since. The southern part of the island supports heavy industrial uses, transport and distribution infrastructure, waste emplacement and a range of port-related facilities.

Orica's facility is located on Walsh Point, which covers the south-eastern tip of Kooragang Island. The site has good road connections with Heron Road to the west and Greenleaf Road to the east, both connecting with Cormorant Road to the north. The area of the site subject to this modification application can be seen in **Figure 2**.

The subject site is located within the land application area of the State Environmental Planning Policy (Three Ports) 2013, however is located outside of the lease area.

The nearest residential community to the Orica facility is in Stockton, which is located on a peninsula some 800 m to the east. Other nearby residential areas include Fern Bay to the north-east, Carrington to the south-west and Mayfield to the west, which are located between 1 and 2 kilometres away.



Figure 2 | Location of Proposed Works within the Site

### 1.3 Approval History

On 1 December 2009, the then Minister for Planning approved a Major Project Application (08\_0129) from Orica for a major expansion of the facility. The expansion also involved modernising and upgrading older plant and infrastructure and implementing a series of risk reduction measures. The 2009 approval permitted Orica to increase overall production levels from:

- 500,000 to 750,000 tpa of AN
- 295,000 to 360,000 tpa of Ammonia
- 345,000 to 605,000 tpa of Nitric Acid.

The approval has been modified on four occasions (see **Table 1**), with several parts of the development not yet operational. The Applicant is required to update the Department annually regarding the status of works on site through an Annual Environmental Management Report.

On 22 January 2021, an order made by the Minister's delegate was published in the Government Gazette declaring the development to be SSD. This is discussed in detail in **Section 3.3.** 

Table 1 | Summary of Modifications

Mod No.	Summary of Modifications	Approval Authority	Approval Type	Approval Date
MOD 1	modify the existing layout of the expansion project and to carry out a series of risk reduction measures	Department	then s75W	11 July 2012
MOD 2	install a higher capacity Nitric Acid storage tank on the site and relocate it to the western part of the site	Department	then s75W	17 December 2014
MOD 3	increase the approved ammonia production rate from 360,000 tpa to 385,000 tpa	Department	then s75W	17 December 2015
MOD 4	installation of nitrate effluent tank	Department	s4.55(1A)	13 May 2021

## 2 Proposed Modification

The Applicant has lodged a modification application under section 4.55(1A) of the EP&A Act to modify the development consent 08\_0129. The modification is described in full in the Modification Report included in **Appendix A** and is illustrated in **Figure 3** and Figure 4.

The modification involves the installation of irrigated fibre-bed scrubbing technology to the existing prill tower to improve the air quality of the prilling process and ancillary works. Construction of the project is expected to take 12 months and occur during normal construction hours.

The project would install a new scrubber vessel, contained in a bund, adjoining the existing prill tower. The existing 12 exhaust fans at the headhouse of the tower would be encased in a manifold, with the exhaust air ducted to the bottom of the scrubber vessel. In the vessel, the tower's exhaust air would pass through a bank of mesh pads which remove the coarser AN particulate from the airflow, followed by a bank of candle filters, capturing the finer particulates. The exhaust air then passes through a fan, discharging via the scrubber exhaust stack.

As part of the process, the candle filters will be periodically wetted to dissolve the AN that collects on them, with this wash water then used to wash the mesh pads, operating in a recirculating flow. This will result in an AN build up in the wash water, which will be discharged from the scrubber and reused through the existing AN plant on site.

In addition to the main project, ancillary works are also proposed to tie the system into the existing services and utilities, as well as a stair tower and strengthening works to the existing prill tower to support the weight of the exhaust manifold and ducting.

### Project Staging

The staging plan approved as part of Modification 3 is also proposed to be updated, to include works since its approval. This will establish the replacement boiler project, the nitrates effluent tank project and this modification as stages 6, 7 and 8, respectively.



Figure 3 | Prill tower and proposed scrubber viewed from Stockton

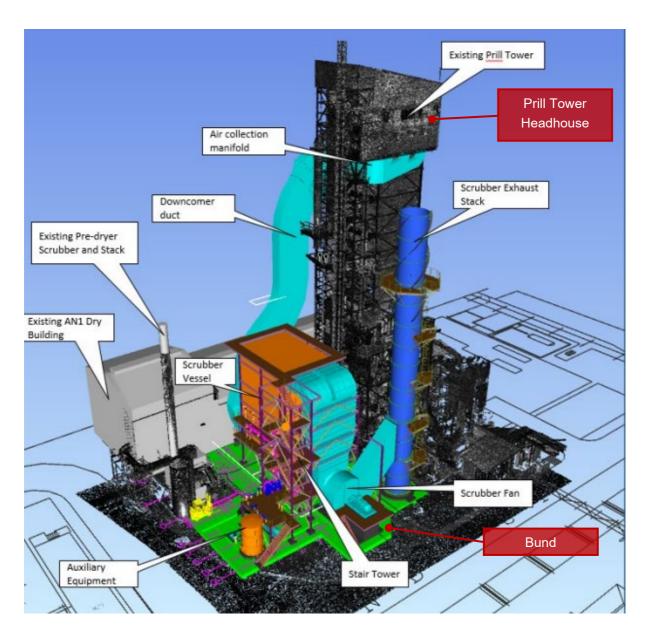


Figure 4 | Layout of proposed scrubber (existing prill tower in grey)

#### 2.1 Justification for Modification

The Environmental Assessment of the original Orica Ammonium Nitrate Expansion Project identified that concentrations of particulate matter of less than 10 micron in size (PM10) were in excess of assessment criteria at two receptor locations in nearby residential areas. As such, Condition 27 was included in the consent to investigate and report on the progress to reduce PM10 emissions from the existing and subject prill tower. In addition, the site's Environment Protection Licence includes a pollution reduction program, which requires installation of air pollution control equipment on the prill tower by early 2024.

In order to meet these existing obligations, the Applicant has proposed a scrubbing device to reduce air emissions to an acceptable level.

# 3 Statutory Context

### 3.1 Scope of Modifications

The Department has reviewed the scope of the modification application and considers the application can be characterised as a modification involving minimal environmental impacts as the proposal:

- would reduce air quality impacts of the existing operations
- the primary function and purpose of the approved development would not change as a result of the proposed modification
- any potential environmental impacts would be minimal and appropriately managed through the existing or modified conditions of consent
- the modification is of a scale that warrants the use of section 4.55(1A) of the EP&A Act
- is substantially the same development as last modified under the former section 75W of the EP&A Act, and
- would not involve any further disturbance outside the already approved disturbance areas for the project.

Therefore, the Department is satisfied the proposed modification is within the scope of section 4.55(1A) of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the application should be assessed and determined under section 4.55(1A) of the EP&A Act rather than requiring a new development application to be lodged.

### 3.2 Consent Authority

The Minister for Planning and Public Spaces (Minister) is the consent authority for the application under section 4.5(a) of the EP&A Act. Under the Minister's delegation of 26 April 2021, the Team Leader, Industry Assessments, may determine the application under delegation as:

- the application has not been made by a person who has disclosed a reportable political donation under section 10.4 of the EP&A Act
- there are no public submissions (other than a council) in the nature of objections, and
- Council has not made a submission by way of objection under the mandatory requirements for community participation listed under Schedule 1 of the EP&A Act.

### 3.3 Part 3A transition to State significant development

This project was originally approved under the former section 75J of the EP&A Act and was a transitional Part 3A project under Schedule 2 of the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 (EP&A (ST&OP) Regulation).

Following amendments to the EP&A Act and the commencement of the associated EP&A (ST&OP) Regulation on 1 March 2018, the power to modify Part 3A project approvals under former section 75W is no longer available for modifications submitted after 1 March 2018. In order to modify a transitional Part 3A project approval, the Minister for Planning and Public Spaces can declare the development to

be SSD by order under clause 6 of Schedule 2 of the EP&A (ST&OP) Regulation. If a declaration is made the project approval becomes a development consent which can be modified under Part 4 of the EP&A Act if it meets the relevant criteria.

On 14 January 2021 the Director, Industry Assessments (as delegate of the Minister for Planning and Public Spaces), made an order under clause 6 of Schedule 2 to the EP&A (ST&OP) Regulation declaring the development the subject of the project approval to be SSD. The order was published in the NSW Government Gazette on 22 January 2021 and took effect from that date.

The effect of this order is that the project approval is taken to be a development consent under Part 4 of the EP&A Act for the carrying out of the development.

### 3.4 Biodiversity Conservation Act 2016

Clause 30A(2)(c) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 specifies that if the determining authority is satisfied a modification will not increase the impact on biodiversity values, a biodiversity development assessment report (BDAR) is not required.

The Department is satisfied that there will be no additional clearing of native vegetation or habitat loss beyond that previous assessed and considered under the original 08\_0129 approval and subsequent modifications.

For the reasons discussed above, the Department's assessment concludes a BDAR is not necessary for the proposed modification.

# 4 Engagement

### 4.1 Department's Engagement

Clause 117(4) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) requires a section 4.55(1A) modification application to be notified or advertised if specified by a community participation plan. The Department's Community Participation Plan notes the exhibition requirements for such modifications are discretionary, and based on the urgency, scale and nature of the proposal.

Given the proposed changes would result in minimal environmental impacts (see **Section** 3), the application was not notified or advertised. However, it was made publicly available on the Department's website on 25 August 2021 and was referred to City of Newcastle Council (Council), the Environment Protection Authority (EPA), Fire and Rescue NSW (FRNSW), SafeWork NSW and the Port of Newcastle for comment.

#### 4.2 Government Advice

Advice was received from two State government authorities and the local council. A summary of this advice is provided below.

**Council** did not object to the modification, however recommended a Construction Traffic Management Plan be prepared and that the Department consider stormwater issues. Council also noted that Section 7.12 contributions are not applicable to this modification.

The **EPA** did not object to the modification, however requested additional information relating to the Applicant's air quality assessment, including calculation clarification, confirmation of pollutants from the prilling process and further justification on the ammonia emission concentrations.

**SafeWork NSW** did not object to the modification, however requested the Applicant perform a hazard and risk assessment for construction activities, noting overhead crane use as a risk in the event of a failure. The submission also requested the Applicant ensure construction activities do not encroach into the AN store.

Port of Newcastle did not provide comment.

FRNSW did not provide comment.

### 4.3 Response to Submissions

On 13 September 20214, the Applicant submitted a Response to Submissions (RtS) letter responding to the issues raised in submissions. The RtS was made publicly available on the Department's website and referred to the EPA for comment.

The RtS advised that the Applicant has a safety management system in place, including preconstruction hazard analysis and constructability reviews as part of its hazard management process to identify risks and refine the construction methodology. The Applicant confirmed crane operations would be considered as part of this, noting the project area is 50 m away from AN storage and no works will occur in the AN store.

In response to the EPA's submission, the RtS provided further justification on the emission concentration methodology and confirmation of pollutants.

The EPA reviewed the RtS and raised no further concerns, recommending two conditions relating to the minimum height of the scrubber stack and requiring the Applicant to carry out a post commissioning air quality verification assessment.

Following the EPA's review of the RtS, the Applicant identified the scrubber stack's height in the Modification Report had been incorrectly described and consequently provided plans correcting this 400 millimetre height error. The EPA was consulted and confirmed it had no objection to this and provided an updated condition reflecting this minimum height.

### 5 Assessment

The Department has assessed the merits of the proposed modification. During this assessment, the Department has considered the:

- the Modification Report and RtS provided to support the proposed modification (see Appendix A)
- the documentation and Department's assessment report for the original project and subsequent modifications (see **Appendix A**)
- advice from State government authorities and Council (Appendix A)
- relevant environmental planning instruments, policies and guidelines
- requirements of the EP&A Act, including the objects of the EP&A Act.

The Department's assessment of issues is provided in Table 2.

### Table 2 | Assessment of Issues

Findings Recommendations

### **Air Quality**

- The proposal seeks to reduce air emissions produced by the existing prill tower by installing a scrubbing device to treat its exhaust air. It is noted Condition 27 of the existing conditions of consent requires the Applicant to reduce air emissions from the prill tower.
- The Applicant provided an Air Quality Impact Assessment (AQIA) as part of its Modification Report. The AQIA compared air quality outcomes between existing and modified operations. The assessment concluded that the addition of the scrubber would result in significant pollutant concentration reductions, complying with the EPA's air quality criteria and significantly improving air quality in the area around the site.
- The EPA reviewed the proposal, including the AQIA, and requested clarification from the Applicant relating to pollutant concentration calculations and justification, types of pollutants and details on the manufacturer's emission guarantee.
- In its RtS, the Applicant addressed these items, providing clarification and justification on the calculations used and confirmed that AN particulates were the only pollutants of concern.
- The EPA reviewed the RtS and raised no further concerns, noting the scrubbing device would result in significant air quality improvements. The EPA recommended two conditions requiring the Applicant to provide an air quality verification study after completion of the project and a minimum scrubber stack height. As noted in **Section 4.3**, the minimum scrubber stack height is shown in updated plans submitted by the Applicant.
- The Department has reviewed the material provided by the Applicant and concurs with the EPA that the modification would result in an improvement in air quality in the surrounding environment.
- The Department is satisfied the existing conditions requiring the Applicant to carry out the development in accordance with the Applicant's modification assessments and approved plans are sufficient in addressing the EPA's recommended height condition.

Require the Applicant to:

carry out an air quality verification study, as required by existing conditions of consent.

• The existing conditions of consent already require the Applicant to submit an air quality verification study to the satisfaction of the EPA and the Department for each project stage (of which the scrubber device forms stage 8). The Department considers this condition adequately addresses the EPA's advice. Should any unforeseen impacts be identified during the verification study, the Applicant would be required to implement additional mitigation measures to address the issue.

 The Department's assessment concludes the modification will result in a positive impact on the air quality of the surrounding environment and can be managed through existing conditions of consent

#### **Noise**

- The installation of additional machinery and equipment has the potential to impact on the acoustic amenity of surrounding communities.
- To address this, the Applicant provided a Noise Impact Assessment (NIA) as part of its Modification Report. Construction
- The NIA confirmed that construction activities would occur within the hours permitted under the existing consent and recommended a Construction Environmental Management Plan (CEMP) be produced to mitigate any potential construction noise.
- Neither the EPA nor Council raised concerns in relation to construction noise.
- Given the small scale of the modification, the Department considers the construction noise generated by the modification to align with that which was contemplated under the original assessment of the development.
- The Department considers construction noise from the modified project can continue to be managed through existing conditions, including those requiring the Applicant to update its CEMP and restricting construction hours to daylight hours.
   Operational
- The NIA modelled expected noise produced by the scrubbing device and compared these against the project specific noise criteria, which are set at 10 decibels below pre-expansion levels and form an existing condition of consent. The NIA found that the project would comfortably meet this noise criteria and would therefore have a negligible impact on sensitive receivers.
- Neither the EPA nor Council raised concerns in relation to operational noise.
- The Department has reviewed the material provided by the Applicant and is satisfied the project will meet the project specific noise criteria and therefore would not increase noise levels above that of the existing operation.
- The Department is satisfied that existing conditions, including those requiring the Applicant to meet operational noise levels and review its Operational Noise and Vibration Management Plan, are sufficient for the management of noise from the modified development and no additional conditions are required.
- The Department's assessment concludes the proposed modification would result in minimal environmental noise impacts and can be managed through existing conditions of consent.

Require the Applicant to:

 review, and if necessary, update the Operational Noise and Vibration Management Plan and CEMP, as required by existing conditions of consent.

### **Visual Amenity**

 The addition of a scrubbing device and supporting infrastructure has the potential to increase the visual prominence of the development and impact on visual amenity, namely from the residential area of Stockton. No amended conditions are required.

- In its Modification Report, the Applicant assessed the visual impact
  of the works and found them to be in keeping with the industrial
  nature of Kooragang Island and consistent with other tall structures
  on the site. The Modification Report also provided a visual
  representation of the works viewed from Stockton which
  demonstrated that the additional structures would blend into the
  existing prill tower structure.
- Council raised no concerns relating to the visual impacts of the works.
- Given the existing tall structures on site, the work's integration with the existing prill tower and the industrial character of Kooragang Island, the Department concurs with the findings of the assessment that visual impacts will be minor.
- The Department's assessment concludes the height, bulk and scale of the modification works would be consistent with the existing and approved structures on Kooragang Island and would have minimal impact on visual amenity.

#### **Hazards**

- Construction and modifications to equipment have the potential to increase hazards and risks at the facility.
- In its Modification Report, the Applicant confirmed the modification application will not increase production limits, however noted that the new scrubber will contain a weak AN solution in the process' wash water, caused from the wetting of the filters. As the weak AN solution is not classified as hazardous, the Applicant concluded that there is no change to the risk profile on the site, nor any additional hazards and as such a Preliminary Hazard Analysis was not required.
- WorkSafe NSW raised no objection but recommended a hazard identification and risk assessment be undertaken for construction activities, paying attention to any cranes used, as well as ensuring no housekeeping in the AN store areas.
- In its RtS, the Applicant confirmed that a pre-construction hazards and constructability review would occur to identify risks and refine construction methodology. The Applicant also confirmed no works would occur in AN store areas.
- The Department's Hazards specialist reviewed the Modification Report and considered the risk profile of the overall site would not increase beyond the results in the existing Preliminary and Final Hazards Analysis. It was recommended the Hazard and Operability Study, Emergency Plan and Safety Management System be updated to reflect the new works.
- The Department has reviewed the existing conditions of consent, as modified and notes that the Applicant will be required to update the Hazard and Operability Study and Construction Safety Study prior to the commencement of construction of each stage. The Applicant has noted Mod 5 works fit wholly within stage 8.

Require the Applicant to:

 review and update the hazard management plans and studies, as required by existing conditions of consent.

 In addition, existing conditions of consent require the Applicant to update the Emergency Plan and Safety Management Plan prior to the commencement of commissioning of each stage.

 The Department concludes the modification is unlikely to increase risk or hazards on the site, subject to the implementation of existing conditions of consent requiring the Applicant to update hazard management plans and studies prior to the construction and operation of the subject stage.

### **Construction Traffic**

- The addition of the scrubber device to the prill tower is not expected to impact on operational traffic, however, it has potential to increase vehicle movements to the site during the construction phase.
- In its Modification Report, the Applicant stated that up to 250 additional light vehicle movements would occur per month during the 12-month construction period, with an additional 40 heavy vehicles per month also expected for deliveries. The Modification Report found that this additional construction traffic is far less than that considered in the original assessments, which saw 14,560 vehicle movements per month at the peak of construction. Due to the project seeing less construction traffic than that originally considered, the Modification Report found the impacts can be appropriately managed through a Construction Traffic Management Plan (CTMP).
- Council raised no objection, however recommended a CTMP be implemented.
- The Department reviewed the existing conditions of consent, as modified, and notes the Applicant was required to prepare a CEMP as well as a CTMP. Existing conditions would require the Applicant to review and update the CEMP and CTMP, in line with this modification. The Applicant has committed to updating its existing CTMP and CEMP to incorporate the modification.
- The Department finds that due to the large existing operations on site, the limited amount of additional traffic generated during construction and the temporary nature of construction, the traffic impacts caused by the modification are negligible and can be managed through a CTMP, as required by the existing conditions of consent.
- The Department concludes the modification would not adversely impact on the efficiency of the local road network, subject to the conditions of the original consent.

Require the Applicant to:

 review, and if necessary, update the CTMP, as required by existing conditions of consent.

### Stormwater

- New structures and alterations to hardstand areas have potential to impact on stormwater management.
- In its Modification Report, the Applicant confirmed the project site is located within the existing stormwater management area, with the first 10 millimetres of runoff being assessed and sent to the site's effluent system. Once operational, due to the reduction in particulate fallout from the scrubber, it is expected stormwater quality will improve.
- In its submission, Council recommended a condition relating to stormwater management, if a condition did not address it in the existing conditions of consent.

Require the Applicant to:

 review, and if necessary, update the Stormwater Management Plan, as required by existing conditions of consent.

 The Department has reviewed the details provided by the Applicant and given the disturbed area being existing hardstand and the scrubber sitting in a bund, is satisfied the modification will have a minimal impact on quality and quantity of the site's stormwater.

- The Department also notes existing conditions of consent require the Applicant to implement a Stormwater Management Plan, satisfying Council's comments. It is noted this management plan will be required to be reviewed, and if necessary, updated, after the approval of any modification.
- The Department's assessment concludes stormwater issues arising from the proposed modification can be suitably managed by the existing conditions of consent.

### 6 Evaluation

The Department has assessed the proposed modification in accordance with the relevant requirements of the EP&A Act. The Department considers the proposed modification is appropriate on the basis that:

- the proposed modification will result in minimal environmental impacts beyond the approved facility
- the modification will improve the air quality of the environment surrounding the site, meeting existing obligations to reduce air emissions
- the proposed modification is substantially the same development as the development authorised by the approval, as last modified under section 75W of the EP&A Act
- changes in built form would not involve any further disturbance outside of the already approved disturbance areas for the development.

The Department is satisfied that the modification should be approved, subject to conditions.

### 7 Recommendation

It is recommended the Team Leader, Industry Assessments, as delegate of the Minister for Planning and Public Spaces:

- considers the findings and recommendations of this report
- determines that the application 08\_0129-Mod-5 falls within the scope of section 4.55(1A) of the EP&A Act
- forms the opinion under clause 30A(2)(c) of the Biodiversity Conservation (Savings and Transitional) Regulation 2017 that a BDAR is not required to be submitted with this application as the application will not increase the impact on biodiversity values on the site
- accepts and adopts all of the findings and recommendations in this report as the reasons for making the decision to approve the modification
- modifies the consent 08\_0129
- signs the attached approval of the modification (Appendix B).

Recommended by:

29 October 2021

**Thomas Bertwistle** 

Environmental Assessment Officer

**Industry Assessments** 

# 8 Determination

The recommendation is **Adopted** by:

29 October 2021

Joanna Bakopanos

Team Leader

**Industry Assessments** 

as delegate of the Minister for Planning and Public Spaces

# **Appendices**

### **Appendix A – List of Documents**

The Department has relied upon the following key documents during its assessment of the proposed development:

### **Modification Application**

 'Modification Report' prepared by Orica Pty Ltd dated August 2021https://www.planningportal.nsw.gov.au/major-projects/project/41786

### **Submissions and Advice**

https://www.planningportal.nsw.gov.au/major-projects/project/41786

#### **Response to Submissions**

 'RE: MP08\_0129 Mod 5 – Orica Kooragang – Prill Tower Scrubber - Request for further information" prepared by Orica Pty Ltd dated 13 September 2021 https://www.planningportal.nsw.gov.au/major-projects/project/41786

### Department's Assessment Report for 08\_0129-Mod-5

https://www.planningportal.nsw.gov.au/major-projects/project/41786

### **Appendix B – Notice of Modification**

The recommended modification instrument for 08\_0129-Mod-5 can be found on the Department's website at <a href="https://www.planningportal.nsw.gov.au/major-projects/project/41786">https://www.planningportal.nsw.gov.au/major-projects/project/41786</a>