Orica Australia Pty Ltd

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NSW Department of Planning, Housing and Infrastructure
Via Major Projects Planning Portal
Att: Shaun Williams

Dear Shaun,

RE: Orica Kooragang Island Expansion Project development consent (08_0129 – MOD8) – Condition 14 and 49 – Preconstruction documentation

I refer to Orica Kooragang Island Expansion Project development consent (08_0129) (the Project), specifically the development consent as modified by Orica's MOD8 33kV Supply Infrastructure Upgrade Project Approval dated 20 May 2025 (MOD8 33kV Supply Infrastructure Upgrade Project), and Condition 14 and Condition 49 which requires provision of the pre-construction studies for approval at least one month before commencement of construction.

Orica attach the FSS, CSS and CEMP pre-construction documentation for approval. The site's PHA has been reviewed with respect to the project and does not require revision as discussed below. In addition, given the electrical nature of the project the relevance of a HAZOP/CHAZOP has been reviewed and determined to not be required as discussed in further detail below. A summary of the preconstruction documentation is detailed below:

Condition 14(a) – Fire Safety Study

A Fire Safety Study is required to be developed for the Project, with consideration to the existing operations, in accordance with the relevant aspects of the Department of Planning's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'.

The Project's current Fire Safety Study has been reviewed with the following observations in relation to MOD8:

1. There are no process materials per se for MOD8 as it is electrical infrastructure only. However, the new switchroom will includes a gaseous fire suppression system using "Inergen" gas, consistent with existing switchrooms on site.

2. The materials of construction for MOD8 are steel or stainless steel with non-combustible fibre cement sheet flooring and fire-resistant cladding (Promatect 100) used to achieve a 2-hour fire rated construction.

However, the new 33kV switchroom is not adequately serviced by fire hydrants. As a consequence, the project scope includes the installation of an additional fire hydrant to meet AS2419 which requires the site be reachable via a 60m hose with a 10m water throw. An updated Fire Safety Study is attached provide as Attachment A in file "Att A - Orica KI Site FSS Report Rev H.pdf" reflecting this change in addition to general site updates.

Maintenance and construction activities and excavation and break in permits associated with the MOD8 33kV Infrastructure Upgrade Project will be undertaken under Orica's existing safety management system.

Condition 14(b) – Hazard and Operability Study

Where relevant, a Hazard and Operability Study for the Project, chaired by a qualified person independent of the Project, approved by the Secretary prior to the commencement of the study is required to be undertaken prior to commencing construction activities consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'.

Given the project is limited to installation of electrical infrastructure and does not involve chemical processes, a HAZOP/CHAZOP study is not relevant to the Project. A letter outlining the review process undertaken to reach this conclusion in relation to the MOD8 33kV Infrastructure Upgrade Project is provided in Attachment B as file "Att B – MOD8 HAZOP Review.pdf".

Condition 14 (c) Final Hazard Analysis

A Final Hazard Analysis of the Project, consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 6, 'Guidelines for Hazard Analysis'. The Final Hazard Analysis shall:

1. report on the implementation of the recommendations of the Preliminary Hazard Analysis;

The FHA/PHA for the Project (up to MOD5) consists of the following documents previously submitted to DPE:

- Original PHA included in the EA (Appendix H) for the Project (GHD - May 2009)
- PHA MOD1 related to the ammonia plant uprate (GHD, March 2012)

- MOD2 PHA update mainly related to updates to the ammonia transfer pipelines and storage (GHD, May 2014)
- MOD2 Phase 2 FHA review for the 3 ammonia flares as part of the Ammonia Management Improvement Project (Hatch, April 2015)
- MOD3 PHA update detailed in Section 6.3 of the MOD3 EA (AECOM, April 2015)

As detailed in previous correspondence, following review of the Nitrates Effluent Tank project (MOD4), the Prill Tower Scrubber (MOD5) and the AN1 ANSOL Supply Project (MOD7) no changes to the above reports were assessed as being required.

The Preliminary Hazard Analysis (PHA) report and the associated updates following subsequent modifications (as outlined above) were reviewed in relation to the MOD8 33kV Infrastructure Upgrade Project. The review confirmed that the above documents do not require modification as detailed in the PHA review letter in Attachment C as file "Att C – MOD8 FHA letter.pdf".

2. re-evaluate and reconfirm the relevant data and assumptions from the Preliminary Hazard Analysis;

See above.

3. re-evaluate and reconfirm all control measures for prevention and mitigation of incidents; and

The CSS identified a number of actions which have or will be implemented through the design, construction or commissioning of the MOD8 33kV Infrastructure Upgrade Project as appropriate. Standard control measures were found to be adequate for prevention and mitigation of potential incidents. The CSS/HAZCON minutes/actions are supplied in Appendix D1 of the CSS report supplied in Attachment D as file "Att D – MOD8 CSS Precon.pdf"

4. evaluate all relevant findings and recommendations from the official investigation report(s), as available, relating to the accident at West, Texas in April 2013.

As the construction of the MOD8 33kV Infrastructure Upgrade Project does not impact on the storage of solid ammonium nitrate at the site (the project involves supply of AN solution), the findings of the West Texas Report were not considered relevant.

<u>Condition 14 (d) - Construction Safety Study</u>

A Construction Safety Study for the MOD8 33kV Infrastructure Upgrade Project, consistent with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 7,

‘Construction Safety Study Guidelines’ is enclosed as Attachment D. A HAZCON for the project was completed on 21 March 2025.

The CSS is provided in Attachment D as file “Att D – MOD8 CSS Precon.pdf” and the HAZCON actions are provided in Appendix D1 of the CSS.

Condition 48 (a) – Aviation Safety

Orica KI has received approval from RAAF Williamtown for a permanent ceiling height for notification of 90m. As the MOD8 project does not involve works above 90m no further notification is required.

A project specific CEMP has been prepared for the MOD8 project and has been supplied as Attachment D as file “Att E - MOD 8 Project CEMP.pdf”

If you require any additional information, please do not hesitate to contact me.

Yours sincerely,
Nathan Robinson
Senior Specialist SHES – Environment and Approvals

Attachments:

Attachment A – FSS Update

Supplied as file “Att A - Orica KI Site FSS Report Rev H.pdf”

Attachment B – HAZOP review letter

Supplied as file ““Att B – MOD8 HAZOP review.pdf”

Attachment C – FHA review letter

Supplied as file Att C – MOD8 FHA letter.pdf”

Attachment D - Construction Safety Study (CSS)

Supplied as file ““Att D – MOD8 CSS Precon.pdf” including:

- HAZCON Actions - Appendix D of the CSS

Attachment E – Project Construction Environmental Management Plan (CEMP)

Supplied as file “Att E – MOD 8 Project CEMP.pdf”