

## Nicholas Hall - Marstel Bulk Liquid Fuel Storage Facility EA 08\_0130

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**From:** Valentina Misevska  
**To:** Nicholas Hall  
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**Subject:** Marstel Bulk Liquid Fuel Storage Facility EA 08\_0130

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Nick,

Please see HDC's comments on the Marstel Environmental Assessment (EA).

### Servicing

The EA states that there is a contractual relationship between Marstel and NPC under which NPC is to provide access and services to the project site boundary. During the operational phase NPC will provide a permanent road and services access from Ingall Street and Steelworks Rd (Section 3.3 and 3.4). The EA also states that certain access and service connections are to be provided as part of the initial stage of the Intertrade Industrial Park development and if they are not available in a time frame that meets the requirements of the Mastel proposal there will need to be further detailed investigations on alternative options (section 3.5.5).

HDC notes that currently, NPC does not own or have any rights to carry out such works to the extent that they are required on the Intertrade Industrial Park lands. While it is expected that Buildev Intertrade Consortium Pty Ltd, as the developer of those lands, will construct roads and service connections along Steelworks Rd at some time during Marstel's operational phase, the timing and design of such roads and service connections has not been finalised. They are currently expected in the second stage of development, not the initial one, and in the case that such roads and service connections are not provided within Marstel's time frames or at all, alternative arrangements would need to be considered.

### Remediation

A Contaminated Site Management Plan (CSMP) has been prepared by the State, intended to provide a frameworks for management of risks associated with contaminated soil and groundwater during redevelopment and future occupation. It is also provided to ensure the remediation is protected and maintained into perpetuity. The CSMP is acknowledged by the EA but it is not clear how the State intends to legally implement it. HDC understands from NPC that the application of the CSMP is a condition of the Marstel lease. Planning may consider whether to also call up the CSMP in the Project Approval conditions.

### Stormwater

The site has been capped with a low permeability clay as a part of the State's remediation. The clay is excellent in reducing infiltration however it remains sensitive to changes in hydraulic flows that can potentially cause erosion of the clay cap.

We note that stormwater is necessarily diverted around the Marstel facility. If appropriately managed, this is not expected to have any impact to the clay cap, provided there is a requirement of the project that any flow concentrated around the facility is conveyed all the way to the downstream western drain receiving waters via an engineered open channel. The flow should be discharged to western drain via an engineered pit / drop structure to prevent any erosion of the western drain batters.

Regards  
Valentina

**Valentina Misevska**  
Development Manager

## Hunter Development Corporation

P: 02 4904 2772

M: 0414 157 245

F: 02 4904 2751

E: [valentina.misevska@hdc.nsw.gov.au](mailto:valentina.misevska@hdc.nsw.gov.au)

W: [www.hunterdevelopmentcorporation.com.au](http://www.hunterdevelopmentcorporation.com.au)

Suite B, Level 5, PricewaterhouseCoopers Centre

26 Honeysuckle Drive, Newcastle

PO Box 813 NEWCASTLE NSW 2300

