

Mrs Joanna Bakopanos  
Team Leader, Industry Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

6 May 2016

Dear Mrs Bakopanos

**Section 75W Modification to Project Approval 09 0090 – Orica Australia Pty Limited,  
Ammonium Nitrate Emulsion Production Facility, Richmond Vale**

SafeWork NSW reviewed the Section 75W Modification Request for the above project and our comments are set out below.

- 1) The proposed process modifications present increased opportunity for pipe blockages to occur within a pressurised system. This increases the likelihood that ammonium nitrate emulsion will be subjected to extremely high pressures, with potentially disastrous consequences. The operator has recognised this hazard, suggesting the use of a pressure differential sensor on the proposed cooler to alert an operator to blockages. We also recommend the use of an independent flow switch be considered, in accordance with current industry best practice.
- 2) The operator should update the Safety Case, submitted to SafeWork NSW in January 2014, with details of the process safety implications of the proposed modifications, particularly with regards to potential major incidents. The update should be developed in consultation with the Major Hazard Facilities team at SafeWork NSW and in accordance with Chapter 9 of the WHS Regulation 2011.

Should the Department determine to approve the modification, there are no issues that would preclude approval provided the following conditions are included in the consent.

**Recommended conditions**

1. Prior to finalising detail design, the applicant must consult with the Major Hazards unit of SafeWork NSW with regard to the safety systems to be incorporated into the modification.
2. Within 3 months of the approval or further time agreed with SafeWork NSW, the applicant shall update the current MHF SafetyCase for the facility and provide the relevant information to SafeWork NSW.

Should you have any queries, please contact me on e mail [sohan.fernando@safework.nsw.gov.au](mailto:sohan.fernando@safework.nsw.gov.au) or telephone 88672747.

Yours sincerely,



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SafeWork NSW