



ENVIRONMENT PROTECTION AUTHORITY

Your reference 09_0147 Mod 1
Our reference: DÖC13/7118
Our contact: Bob Marr

Mr Chris Ritchie
Manager – Industry
Major Projects Assessment
Department of Planning and Infrastructure
23-33 Bridge St
SYDNEY NSW 2001

Attn: Emma Barnet

Dear Mr Ritchie

The Environment Protection Authority (EPA) refers to your letter dated 26 February 2013 seeking a submission on the application under *Section 75W* of the *Environmental Planning and Assessment Act* to modify Project Approval (09_0147 Mod 1) to permit the installation of a 'contaminated' water storage pond and three treated water storage ponds at the Orica Villawood Soil Remediation Project site. The EPA refers also to the appended letter provided by the applicant titled: *Villawood Soil Remediation Project - Project Approval 09_0147 Modification Request 1* dated 25 February 2013.

As you may be aware the EPA has reviewed Orica's Water Management Plan (WMP) which sets out site management arrangements as well as the environmental controls associated with this Modification Application. In that regard EPA has consulted with Orica and this consultation has led to some revisions of the WMP.

Nonetheless, given the number, variability and concentration of contaminants at the Orica site the EPA recommends that a conservative approach is appropriate for water management. As with many sites involving extensive earthworks and because of the nature of the contaminants likely to be excavated, the water management system must be appropriately installed, operated and maintained to ensure that no contaminated discharges leave the site via the stormwater system. Whilst the EPA has no objections in principle to the proposed water management arrangements, the EPA recommends that appropriate contingencies are made to ensure that no contaminated water can leave the site particularly during prolonged or repeated wet weather events. Environment Protection Licence No 2149 which permits activities at the site will require "no discharge" to the environment of stormwater from contaminated areas of the site. The EPA intends to monitor site stormwater management during wet weather events once earthworks commence.

Accordingly the EPA recommends that:

- The applicant must develop clear operating procedures and contingency plans for water management if the water treatment plant breaks down or it is not operating at full capacity. These plans must include the use of other available storage on-site or tankering contaminated water offsite to a licensed facility that can accept the wastewater; and

- The applicant must provide the EPA with the above updated elements of these procedures and plans for review and comment.

Providing these elements are developed and implemented the EPA has no objection to the Department of Planning and Infrastructure approving this modification should it decide to do so.

If you have any queries regarding these matters please contact Bob Marr on 9995 6825.

Yours sincerely



13/3/13

GREG SHEEHY
Manager Sydney Industry
Environment Protection Authority