



Erskine Park Metal Coating Line No. 7 (MCL7)

Scoping Report

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20 June 2022

Erskine Park Metal Coating Line No. 7 (MCL7)

Scoping Report

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Acronyms and Abbreviations

Name	Description	
ABS	Australian Bureau of Statistics	
AGL	Above ground level	
AHIMS	Aboriginal Heritage Information Management System	
AQMS	Air Quality Monitoring Station	
ASL	Above sea level	
BC Act	NSW Biodiversity Conservation Act 2016	
BDAR	Biodiversity Development Assessment Report	
BlueScope	BlueScope Steel Limited	
CBD	Central business district	
CPL8	Coil Paint Line Number 8	
DA	Development Application	
DPE	NSW Department of Planning and Environment (formerly Department of Planning, Industry and Environment, DPIE)	
DPIE	NSW Department of Planning, Industry and Environment (now Department of Planning and Environment, DPE)	
EIS	Environmental Impact Statement	
EPBC Act	Commonwealth Environmental Protection and Biodiversity Conservation Act 1999	
EP&A Act	NSW Environmental Planning & Assessment Act 1979	
EPL	Environment Protection Licence	
ERM	Environmental Resources Management Australia Pty Ltd	
GCCSA	ABS' Greater Capital City Statistical Area	
GSRP	Greater Sydney Regional Plan	
LGA	Local Government Area	
LSPS	Local Strategic Planning Statement 2020-2040	
Ktpa	kilo tonnes per annum	
MCL7	Metal Coating Line Number 7	

Name	Description	
MNES	Matters of National Environmental Significance	
NSW	New South Wales	
PAD	Potential Archaeological Deposit	
Penrith DCP	Penrith Development Control Plan 2014	
Penrith LEP	Penrith Local Environmental Plan 2010	
PKSW	Port Kembla Steelworks	
POEO Act	Protection of the Environment Operations Act 1997	
SA1	ABS' Statistical Area Level 1 dataset	
SA2	ABS' Statistical Area Level 2 dataset	
SEARs	Secretary's Environmental Assessment Requirements	
SEIFA	Socio-Economic Indexes for Areas	
SEPP	State Environmental Planning Policy	
SES	Stakeholder Engagement Strategy	
SIA	Social Impact Assessment	
SSD	State Significant Development	
TEC	Threatened Ecological Community	
WCDP	Western Sydney District Plan	
Western Sydney Airport	Western Sydney International (Nancy-Bird Walton) Airport	
WSSC	Western Sydney Service Centre	

Glossary

Term	Description	
dB	dB is a logarithmic ratio between a measured level and a reference level. The reference level for sound power is 1 x 10^{-12} Watts and for sound pressure 2 x 10^{-5} Pascals.	
dBA	dBA denotes a single number sound pressure level that includes a frequency weightin ("A-weighting") to reflect the subjective loudness of the sound level. The frequency of sound affects its perceived loudness. Human hearing is less sensitive at low and ver high frequencies, and so the A-weighting is used to account for this effect. An A-weighter decibel level is written as dBA.	
L _{eq}	The 'equivalent continuous sound level', Leq, is used to describe the level of a time- varying sound or vibration measurement. Leq is often used as the "average" level for a measurement where the level is fluctuating over time. Mathematically, it is the energy- average level over a period of time (i.e. the constant sound level that contains the equivalent sound energy as the measured level). When the dBA weighting is applied, the level is denoted dB LAeq.	
the Proponent	BlueScope Steel Limited	
the Project	The Project refers to the proposal by the proponent (BlueScope) to construct and operate the Metal Coating Line 7 as described in this Scoping report.	
Project Site	The Project Site refers to the location of Metal Coating Line 7 within the broader WSSC.	

1. INTRODUCTION

1.1 Introduction

The Proponent, BlueScope Steel Limited (BlueScope) proposes to construct and operate its seventh Metal Coating Line (MCL7) (the Project) within BlueScope's Western Sydney Service Centre (WSSC) in Erskine Park, NSW. The proposed metal coating line will produce Zincalume® steel, a zinc/aluminium coated steel. The Proponent is seeking State Significant Development (SSD) consent under Part 4, Division 4.7 of the *Environmental Planning & Assessment Act 1979* (EP&A Act) for the Project.

The Proponent has engaged Environmental Resources Management Australia Pty Ltd (ERM) to prepare a Scoping Report for the Project, as a first step in the SSD consent process. The Scoping Report supports an application to the Secretary of the NSW Department of Planning and Environment (DPE) for Secretary's Environmental Assessment Requirements (SEARs). The SEARs will guide the preparation of an Environmental Impact Statement (EIS) for the Project to accompany the Project Development Application (DA).

1.2 Proponent

BlueScope is an Australian based company with operations in Australia, North America and the Asia-Pacific that specialises in the production of steel materials, products, systems and technologies. It has sales offices across 18 countries and currently employs over 14,850 people globally. BlueScope is a leading manufacturer of painted and coated steel products, with strong expertise in providing steel components for houses, buildings, automotive, and other structures.

In Australia, BlueScope currently employs 6,700 people at more than 50 facilities and 50 distribution centres. The BlueScope business in Australia specialises in flat steel products including slab, hot rolled coil, cold rolled coil, plate, and value-added metallic coated and painted steel products. BlueScope's Port Kembla Steelworks (PKSW) is the largest steel production facility in Australia with an annual production capacity of approximately three (3) million tonnes of crude steel. The cold rolled steel coils which will be the key input required for operation of the proposed MCL7 will be sourced from BlueScope's Springhill Works located adjacent to the PKSW.

The Australian Business Number (ABN) and address of BlueScope are listed below:

- **ABN:** 16 000 011 058; and
- Address: Level 11, 120 Collins Street, Melbourne, VIC 3000.

1.3 Project Overview

The WSSC is located at 25-55 Templar Road, Erskine Park, NSW (-33.818858, 150.793761), and currently contains the BlueScope Coil Paint Line 8 (CPL8) facility, associated storage areas, an office, car park, and paved and open grass areas. The regional context of the WSSC is identified in **Figure 1-1**.

BlueScope proposes to develop the Project, which will be integrated into the existing WSSC facility. It will be located to the south and east of the existing CPL8, which is operated in accordance with SSD Approval DA 206-8-2004-I and subsequent modifications. It is unlikely that DA206-8-2004-I will require any further modifications to the SSD Approval as a result of the proposed development, however this will be reviewed following further detailed assessments.

The Project Site is the location of the proposed MCL7 facility within the broader WSSC. The Project Site covers an approximate area of 3.2 hectares (ha) as shown in **Figure 3-1**.

MCL7 will produce Zincalume® steel, which is a zinc-aluminium coated steel product produced through the process of coating cold rolled steel strips with a zinc-aluminium alloy. The throughput of MCL7 will be approximately 240 kilo tonnes per annum (ktpa).

MCL7 will be capable of producing "bare" and paint line feed products, of which:

- approximately 80 ktpa of "Bare" Zincalume® steel products will be despatched in an unpainted form either to customers, or for further offsite processing; and
- approximately 160 ktpa of paint line feed products will be sent on to the existing CPL8 to produce painted products such as Colorbond® steel. Therefore, the CPL8 throughput will increase from 120 ktpa up to its approved capacity of approximately 160 ktpa.

The Project will involve the construction of the following buildings, processing plant/equipment and all ancillary features (internal roads, hardstands, construction compounds, and laydown areas) to accommodate the MCL7 facility:

- a main building located to the south of CPL8 containing the MCL7 facility;
- additional facilities (such as storage areas, crib rooms and offices) located in southern extensions
 of the main building;
- a despatch building adjoining the main building to the east, for the storage and despatch of finished products from the MCL7 facility;
- three (3) new stacks located above the MCL7 main building; and
- one (1) new MCL7 chemical storage area located adjacent to the existing CPL8 paint and chemical storage area.

The Project design and components are described in further detail in **Section 3.2**, and preliminary plans are provided in **Appendix G**.

1.3.1 Project Objectives

The objectives of the Project are to:

- support the demand / supply of steel products within BlueScope's existing customer market base;
- provide both direct and indirect employment opportunities during construction and operation;
- liaise and work with the community and all potentially affected stakeholders in the identification, mitigation and/or monitoring of any potential environmental effects;
- ensure quality, safety and environmental standards are maintained;
- recycle and reuse materials where practical and economically feasible; and
- minimise all potential adverse environmental impacts.

1.4 Purpose of this Report

This Scoping Report supports an application for SEARs which will guide the development of the EIS to support a future SSD application under Part 4 of the EP&A Act. The Scoping Report has been prepared in accordance with the following guidelines:

- State Significant Development Guidelines Preparing a Scoping Report: Appendix A to the State Significant Development Guidelines (DPIE, 2021a) (Scoping Report Guidelines);
- Social Impact Assessment Guideline for State Significant Projects (DPIE, 2021b);
- Cumulative Impact Assessment Guidelines for State Significant Projects (DPIE, 2021c); and
- Undertaking Engagement Guidelines for State Significant Projects (DPIE, 2021d).



2. STRATEGIC CONTEXT

2.1 Site Setting and Features

2.1.1 Regional Context

The WSSC is located in Erskine Park, NSW, approximately 45 km west of Sydney central business district (CBD), 23 km west of Parramatta CBD, and 19 km east of Penrith CBD. It is situated within the City of Penrith Local Government Area (LGA) and the broader Western City District of Greater Sydney, approximately 5.2 km west of the M7 Motorway and 2.4 km south of the M4 Motorway. The regional context is displayed is **Figure 1-1** above.

The Penrith LGA covers an area of approximately 405 km² and recorded a population of 196,066 in 2016 (ABS, 2021), which is expected to grow to 260,000 by 2036 (Penrith City Council, 2020). The LGA contains a diverse range of land uses including residential, commercial, industrial, and agricultural land uses. Rural and rural-residential land uses currently comprise 80 percent of the LGA, with the remaining 20 percent considered urban (Penrith City Council, 2020). In addition, the LGA contains 9,830 ha of land zoned nature reserves and national parks, including 17 percent of the remaining bushland of the Cumberland Plain.

The Western City District is one of the five districts of Greater Sydney as identified in the Greater Sydney Regional Plan (GSRP) (GSC, 2018) and Western City District Plan (WCDP) (GSC, 2018). The Western City District consists of eight LGAs including the Penrith LGA and covers a total area of 8,091 km². It had a population of 1,070,000 in 2016, which is projected to grow to 1,534,450 by 2036 (GSC, 2018). The Western City District contained 370,200 jobs or 15 percent of the total jobs in Greater Sydney in 2016, including 25 percent of which were in the industrial sector (GSC, 2018).

The WSSC is located within the Hawkesbury-Nepean Catchment, which is the longest coastal river catchment in NSW river catchment stretching across an area of 21,400 km². It is also situated on the Cumberland Plain, which is a biographic region which covers an area of 2,750 km² that has a relatively flat topography.

2.1.2 Local Context

The WSSC is located within the suburb of Erskine Park, NSW, approximately 4 km from the eastern boundary of the Penrith LGA. Erskine Park recorded a population of 6,436 people in 2016 (ABS, 2021) and contains a variety of land uses including industrial and residential. The suburb is separated into the north and south by an electricity easement, located at the northern boundary of the Erskine Park Employment Lands and Erskine Business Park, as shown in **Figure 2-1**. The electricity easement travels east-west and contains open grass areas, varying in width between 130–160 m.

The northern section of Erskine Park contains mostly residential land uses zoned *R2 Low Density Residential* pursuant to the Penrith Local Environmental Plan 2010 (Penrith LEP). It also contains several parks and reserves zoned *RE1 Public Recreation* pursuant to the Penrith LEP, including Chameleon Reserve, Peppertree Reserve, Phoenix Reserve. The suburb of St Clair is located directly west of this area; St Clair is also a predominantly residential suburb containing mostly *R2 Low Density Residential* and *RE1 Public Recreation* zoned land. The nearest residential receptors are located approximately 780 m north of the WSSC on *R2 Low Density Residential* zoned land in Erskine Park, as shown in **Figure 2-1**.

The WSSC is located within the southern section of Erskine Park, which comprises Precinct 1 (Erskine Park Employment Lands) of the Western Sydney Employment Area, pursuant to *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP). This area predominantly contains industrial landuses zoned *IN1 General Industrial*, in addition to vegetated areas zoned *C2 Environmental Conservation* within the Erskine Business Park (also known as the Erskine Park industrial precinct). The industrial developments are centred along Lenore Drive and Erskine Park Road (**Figure 2-1**), which are two major roads providing access to the industrial precinct.

Erskine Park is identified as one of the Western City District's ten largest industrial and urban services precincts within the WCDP. As of 2016, there was a total of 366 hectares of industrial and urban services land in Erskine Park, consisting of 250 hectares of developed land and 166 hectares of undeveloped land (GSC, 2018). More land is proposed to be rezoned for industrial and urban services in future within Erskine Park and the broader Western Sydney Employment Area. Over 6,000 hectares of additional land for future industrial activity is expected, which will provide more than 57,000 jobs to the region over the next 30 years (GSC, 2018).



2.1.3 Site Context

The WSSC is located at 25-55 Templar Road, Erskine Park, NSW, with title details Lot 3 of DP 1094504. It is zoned *IN1 General Industrial* pursuant to the provisions of the Industry and Employment SEPP. The WSSC is located within the industrial areas of Erskine Park and is surrounded by existing light industrial and warehousing, as shown in **Figure 2-2**. It currently contains BlueScope's CPL8 facility, associated storage areas, an office, car park, and paved and open grass areas. Access to the WSSC is provided along its eastern boundary via Templar Road.

Boundaries and surrounding land uses of the WSSC are detailed in Table 2-1 below.

Direction	Details	
North	IN1 General Industrial zoned industrial premises including the Digital Realty Data Centre and Bevchain warehouse facility.	
East	IN1 General Industrial zoned Templar Road, followed by IN1 General Industrial zoned industrial premises including Goodman Fielder and Scotts Refrigerated Logistics.	
South	IN1 General Industrial zoned industrial premises including EHI Australia and ORAFOL Australia	
West	C2 Environmental Conservation zoned Erskine Park Landfill site	

Table 2-1 Boundaries and Surrounding Land Use

The Project Site is the location of the proposed MCL7 facility within the broader WSSC. The Project Site covers an approximate area of 3.2 ha and is located to the south and east of CPL8, with an elevation of approximately 48 - 54 metres above sea level (ASL) and currently contains open grass areas and paved surfaces including the existing car parking area at the WSSC.



2.2 Strategic Framework

The Project will align with various strategies, policies, and plans across National, State (NSW), regional, and local contexts. The strategic framework for the Project is outlined in **Table 2-2** below.

Table 2-2	Alignment with	Strategic Framework
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Strategy, Policy or Plan	Description	Project Alignment			
NSW Context	NSW Context				
NSW 2040 Economic Blueprint	 The NSW 2040 Economic Blueprint sets out a direction for the continued success of NSW in a changing world and expanding global economy (NSW Treasury, 2019). The Blueprint identifies challenges and risks and highlights major opportunities for the NSW Government to grow industries, innovate and improve our economy. The report was prepared in consultation with stakeholders, and outlines a range of key aspirations for NSW to reach by 2040: The nation's first trillion-dollar economy; Healthy, productive people; Liveable and connected cities; Productive, vibrant regions; Innovative and world class businesses; A sustainable environment with reliable and affordable energy; and Enhanced performance of government. 	The NSW 2040 Economic Blueprint focuses on achieving economic growth through advanced manufacturing and new industries. The Project will contribute to these objectives by providing significant capital investment which will deliver benefits to the NSW economy. Additionally, the continued production of painted and bare coil products at the WSSC will benefit downstream manufacturing industries, helping to promote the development of advanced manufacturing and new industries.			
NSW COVID-19 Recovery Plan	 The NSW COVID-19 Recovery Plan is the NSW Government's plan to rebuild the economy of NSW following the COVID-19 pandemic (NSW Government, 2020). The Plan identifies various investments and initiatives which aim to boost the NSW economy and promote its future resilience and self-sufficiency. Relevant initiatives outlined within the Plan include: Building a self-sufficient economy through supporting advanced manufacturing and local supply chains; and A Planning System Acceleration Program to support productivity, investment and jobs by reducing the time taken to approve projects 	The Project will contribute in meeting the goals of the NSW COVID-19 Recovery Plan by promoting an industrial development that will create employment opportunities. The painted and bare coil products from the MCL7 will support a variety of downstream manufacturing businesses, support the local manufacturing sector, and maintain local supply chains. The Project will also provide ongoing employment opportunities during construction and operation, therefore supporting a resilient and self- sustaining NSW economy.			
Building Momentum: State Infrastructure Strategy 2018- 2038	The State Infrastructure Strategy 2018-2038 a 20-year infrastructure investment plan for NSW across each of NSW's key infrastructure sectors – transport, energy, water, health, education, justice, social housing, culture, sport and tourism (Infrastructure NSW, 2019). The Strategy identifies policies and strategies needed to provide the infrastructure that meets the needs of a growing population and a growing economy. It assesses infrastructure challenges and solutions, and provides recommendations on how to best grow the State's economy, enhance productivity and improve living standards for the NSW community.	The Project aligns with Recommendation 58 and Recommendation 59, which outline the importance of preserving strategically important industrial land for future industrial development. In addition, the Strategy outlines how economic growth and improved living standards will be achieved through investment in infrastructure projects. These include roads, rail, ports, water, telecommunications, hospitals, schools, and sports facilities, which are generally steel-intensive. The Project will therefore support the aims of the strategy by creating a local source of steel products to downstream manufacturers and the construction industry.			

Strategy, Policy or Plan	Description	Project Alignment
Regional Contex	t	
Greater Sydney Regional Plan	The Greater Sydney Regional Plan (GSRP) was published by the Greater Sydney Commission in 2018, and is the relevant regional plan for the Greater Sydney Region (GSC, 2018). The GSRP is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, and services. The three cities include the Western Parkland City, Central River City, and Eastern Harbour City. The Project is located within the Western Parkland City, which is one of the three cities that comprise Greater Sydney as identified in the GSRP. The GSRP outlines 11 Planning Directions and 40 associated Objectives under the following five broader themes: Infrastructure and Collaboration; Liveability; Productivity; Sustainability; and Implementation.	 The Project will be located within the Western Sydney Employment Area, which is identified in the GSRP as key long-term industrial and employment area within Greater Sydney. The GSRP states that there may be a need to provide additional industrial and urban services areas across the Western City District to accommodate significant population growth beyond 2036 (GSC, 2018, p. 131). The Project directly aligns with the following objectives and their associated strategies under the broader theme of Productivity: Objective 23 – Industrial and urban services land is planned, retained and managed; Strategy 23.1 – Retain, review and plan industrial and urban services land; Objective 20 – Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City; and Strategy 20.2 – Develop and implement land use and infrastructure plans for the Western Sydney Airport, the metropolitan cluster, the Western Sydney Employment Area and strategic centres in the Western Parkland City.
Western City District Plan	 The Western City District Plan (WCDP) is one of five district plans under the GSRP, and the relevant district plan for the Project (GSC, 2018). The Western City District includes eight LGAs in Western Sydney, including the Penrith LGA. The WCDP aligns with the broader GSRP and outlines a vision for the future of the Western City District. The WCDP contains 20 Planning Priorities responding to the broader objectives of the GSRP, listed under the following five themes: Infrastructure and Collaboration; Liveability; Productivity; Sustainability; and Implementation. 	 The WCDP identifies Erskine Park as one of the Western City District's ten largest industrial and urban service precincts. In addition, it notes that the industrial and urban services land within the Western Sydney Employment Area are vital to the region, and attracts local, national and international businesses. The Project will therefore contribute to the further development of the Western Sydney Employment Area. The Project directly aligns with the following Planning Priorities under the broader theme of Productivity: W7 – Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City W8 – Leveraging industry opportunities from the Western Sydney Airport and Badgerys Creek Aerotropolis W10 – Maximising freight and logistics opportunities and planning and managing industrial and urban services land

Strategy, Policy or Plan	Description	Project Alignment
Western Sydney City Deal	 The Western Sydney City Deal is a partnership between the Australian Government, NSW Government and eight local councils of the Western Parkland City, including the City of Penrith (Australian Government & NSW Government, 2018). The City Deal aligns with the <i>Smart Cities Plan</i> and <i>Western City District Plan</i>, and includes 38 commitments with the core goals of: Realising the 30-minute city by delivering the Sydney Metro–Western Sydney Airport (formerly the North South Rail Link); Creating 200,000 jobs by supercharging the Aerotropolis and agribusiness precinct as catalysts; Skilling our residents in the region and initiating an Aerospace Institute; Respecting and building on local character through a \$210 million Liveability Program; Coordination and innovation through a Planning Partnership; and Getting on with delivering for the Western Parkland City with enduring tri-level governance. 	 The Project aligns with the aims of the Western Sydney City Deal by contributing to the economic development of the Western Parkland City. The Project will create up to 250 – 300 new jobs during construction, and approximately 45 permanent operations and maintenance roles during operations, contributing to the future development of jobs within the region. In addition, the Project will respond to the following objectives which are outlined under 'jobs for the future' commitment: Establishing jobs in the region; and Creating high-value employment precincts.
Local Context		1
Penrith Local Strategic Planning Statement	The Penrith Local Strategic Planning Statement (LSPS) was adopted by Council in March 2020 (Penrith City Council, 2020). It compiles planning priorities identified at state, regional, district and local levels and identifies how to manage the challenges facing the local area. The purpose of the LSPS is to outline Penrith's economic, social and environmental land use needs over the next 20 years. The LSPS identifies 21 Planning Priorities under ten broader themes aligned with those contained within the GSRP and WCDP.	 The Project is a proposed industrial development that aims to meet the future employment needs of the Penrith LGA. It will create up to 250 – 300 new jobs during construction, and approximately 45 permanent operations and maintenance roles during Project operations. The Project directly aligns with the following Planning Priorities and associated Actions: Planning Priority 1 – Align development, growth and infrastructure; Planning Priority 2 – Work in partnership to unlock our opportunities; and Planning Priority 12 – Enhance and grow Penrith's economic triangle.
Penrith Community Plan 2017	 The Penrith Community Plan 2017 (CP) identifies the community's long term aspirations for the City of Penrith in the next 10 years and beyond (Penrith City Council, 2017). The CP sets out long term strategies and community outcomes to grow Penrith as a Regional City into the future. There are seven community outcomes including: Outcome 1 – We can work close to home; Outcome 2 – We plan for our future growth; Outcome 3 – We can get around our city; Outcome 5 – We care for our environment; Outcome 6 – We are healthy, and share strong community spirit; and 	 The Project will contribute to economic growth and the future employment needs of the Penrith LGA. It will create up to 250 – 300 new jobs during construction, and approximately 45 permanent operations and maintenance roles during Project operations. The Project will directly respond to the following Outcomes and associated Strategies identified in the CP: Outcome 1 – We can work close to home Strategy 1.1 – Attract Investment to grow the economy and increase the range of businesses operating in the region;

Strategy, Policy or Plan	Description	Project Alignment
	 Outcome 7 – We have confidence in our Council. 	 Outcome 2 – We plan for our future growth; Strategy 2.1 – Facilitate development in the City that considers the current and future needs of our community; and Strategy 2.3 – Ensure services, facilities and infrastructure meet the changing needs of our City
Penrith Employment Lands Strategy 2021	 The Employment Lands Strategy 2021 aims to strengthen the economic development and resilience of Penrith as a productive and innovative city, and improve community wellbeing in an environmentally responsible way (Penrith City Council, 2021). The Employment Lands Strategy outlines four Strategic Directions that are aligned to the LSPS vision of Penrith as a connected, healthy, innovative and balanced city. These include: Connected – Deliver a safe, efficient and sustainable 30-minute city; Healthy – Support the health and wellbeing of workers, residents and visitors; Innovative – Build on existing strengths and attract new enterprise; and Balanced – Protect our environment and strengthen our resilience 	The Employment Lands Strategy identifies Erskine Park as one of the five primary industrial precincts within the LGA, and a key centre of large scale major industrial manufacturing and large scale urban services and utilities. An audit of Penrith's employment lands found that in December 2019, 70 percent of vacant zoned and serviced employment land was located in the Erskine Park industrial precinct (HillPDA, 2020). The Project will therefore contribute to the development of industrial lands within the Erskine Park Precinct through the construction of a large scale major industrial manufacturing facility. In addition, the Project will contribute to the economic development of Penrith and aligns with Action 6 – Planning future employment land with good access to motorways.

2.3 **Project Justification**

2.3.1 Project Benefits

The Project will deliver benefits to the local community including:

- up to 250 300 new jobs during the peak of Project construction;
- approximately 45 permanent operations and maintenance roles during Project operation;
- opportunities for local contractors during ongoing maintenance activities;
- the supply of steel products for infrastructure projects; and
- a capital investment of between \$250 300 million.

In addition, the Project will deliver benefits for BlueScope by:

- supporting the growing demand for BlueScope's business;
- increasing the future sustainability of BlueScope's operations; and
- contributing to the geographic diversification of BlueScope's operations.

Construction and operation of the Project will require a range of skills including engineering, trades (electrical, mechanical, construction), transport, building material providers, equipment operators, consultants and administrative staff.

2.3.2 Site Suitability

The WSSC is considered suitable for the proposed MCL7 for the following reasons:

- the Project is compatible with the existing industrial land uses on and surrounding the WSSC;
- the WSSC is easily accessible via Templar Road and Lenore Drive, which provides a connection onto the M7 motorway; and
- the Project is consistent with the IN1 zoning and will aim to meet the following objectives of the IN1 zone:
 - to facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space;
 - to minimise any adverse effect of industry on other land uses; and
 - to encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.

3. THE PROJECT

This section provides a description of the Project and its indicative design, components, and operational features. The WSSC and surrounding area are also described, expanding on information from **Section 2.1**.

3.1 **Project Area and Project Site**

The WSSC forms the Project Area, and is located at 25-55 Templar Road, Erskine Park, NSW, on the following legal lot description, Lot 3 of DP 1094504 (-33.818858, 150.793761). It currently contains BlueScope's CPL8 facility, associated storage areas, an office, car park, and paved and open grass areas. The site context of the WSSC is illustrated in **Figure 2-2**.

The Project Site is the location of the proposed MCL7 facility within the broader WSSC. The Project Site covers an approximate area of 3.2 hectares (ha) (including 1.25 ha of new development footprint) and is located to the south and east of CPL8, as displayed in **Figure 3-1** below. It has an elevation of approximately 48 – 54 metres ASL, and currently contains open grass areas and paved surfaces including the existing car parking area at the WSSC.

3.2 **Project Description**

The Project involves the construction and installation of a new metal coating line to the south and east of the existing CL8 within the existing WSSC facility in Erskine Park, NSW. The Project has a total capital investment value of between \$250 - \$300 million.

MCL7 will produce Zincalume® steel, which is a zinc-aluminium coated steel product produced through the process of coating of cold rolled steel strip with a zinc-aluminium alloy. The throughput of MCL7 will be approximately 240 ktpa. The existing CPL8 has a total approved capacity of 160 ktpa, but currently produces approximately 120 ktpa of painted products. It is not anticipated that any modifications to CPL8 will be required as part of this Project. There will be no consolidated operations between the CPL8 and MCL7, except for the transfer of Zincalume® steel paint line feed to the CPL8.

MCL7 will be capable of producing both "bare" and paint line feed products:

- "Bare" Zincalume® steel products will be despatched in an unpainted form either to customers or for further offsite processing; and
- Paint line feed products will be sent on to the existing CPL8 to produce painted products such as Colorbond® steel. Currently, CPL8 produces painted products resulting in existing throughput volumes comprising approximately 120 ktpa of bare Zincalume® steel coil input feed and 120 ktpa of painted coil outputs. The inclusion of MCL7 on the WSSC site will allow CPL8 to operate at its approved capacity of 160 ktpa, fed almost exclusively from MCL7.

Up to 240 ktpa of cold rolled coil inputs will be sourced from BlueScope's Springhill Works to produce the following outputs from MCL7 (noting the actual mix of outputs may vary depending on prevailing market conditions):

- approximately 80 ktpa of Bare Zincalume® steel directly to customers or for further offsite processing, despatched from the new MCL7 despatch building; and
- approximately 160 ktpa of Zincalume® steel paint line feed for input into CPL8, transferred to CPL8 through the new MCL7 despatch building.



3.2.1 **Project Design and Components**

The Project will involve the construction of buildings, processing plant/equipment and all ancillary features/infrastructure to accommodate the MCL7 facility, including (but not limited to) internal roads, hardstands, construction compounds, and laydown areas. Refer to **Appendix G** for further detail on the dimensional features of the Project.

The MCL7 key components and detailed line configuration is outlined in subsequent sections, however, is summarised as follows:

- a new main building located to the south of CPL8 to contain the MCL7 facility divided into three sections each of different heights. The building height profile is derived by the anticipated height and layout of the equipment contained within each of the sections of the building. These sections are outlined below:
 - a 'low bay' in the western section of the building with a "top of roof ventilator" height of approximately 19 m. This building will house the coil feed area and line entry equipment;
 - a 'medium bay' in the eastern section of the building with a "top of roof ventilator" height of approximately 25 m. This building will house line processing and exit equipment; and
 - a 'high bay' in the central section of the building with a "top of roof ventilator" height of approximately 33 m. This building will house much of the line processing equipment.
- additional new facilities located in southern extensions of the new main building, including an
 ingot storage area, pot equipment maintenance and storage area, offices and crib facilities,
 laboratory and test facility, high voltage switchroom, electrical equipment room, hydrogen and
 nitrogen storage areas and truck parking and unloading area;
- a MCL7 despatch building adjoining the new main building to the east for the storage and despatch of finished products from MCL7, containing:
 - a packaging station at the southern end;
 - a coil storage area in the central area; and
 - a coil transfer conveyor at the northern end, with the purpose of transferring paint line feed coils to CPL8.
- three (3) new stacks located above the MCL7 main building including:
 - a furnace stack at a height of approximately 39 m above ground level (agl);
 - a passivation stack at a height of approximately 33 m agl; and
 - a resin stack at a height of approximately 31 m agl.
- one (1) new MCL7 chemical storage area located adjacent to the existing CPL8 paint and chemical storage area.

The dimensions and floor area of the new MCL7 main building and MCL7 despatch building are detailed in **Table 3-1**.

Table 3-1 MCL/ Building Dimensions and Floor Area

Specification	MCL7 Main Building	MCL7 Despatch Building
Length (m)	228.5	108
Width (m)	25	27.5
Floor Area (m ²)	5,710	2,970

3.2.2 Line Configuration

The configuration of MCL7 will include the following four key components within the MCL7 Main Building:

- Cold Rolled Full Hard (CRFH) coil storage area;
- Entry section;
- Process section; and
- Exit section.

The key components are displayed in **Figure 3-2**, and their features and equipment are listed in **Table 3-2**.



MCL7	' Line C	Configuration	- Key Components	F3-2
Drawing No:	0628175s_EB	P_SR_C001_R1.cdr	Erskine Park	1
Date:	24/05/2022	Drawing size: A4		
Drawn by:	VN	Reviewed by: DS	Client: BlueScope Steel	
			This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.	ERN

MCL7 Component	Features
CRFH Coil Storage Area	 Coil storage area for feed coils to MCL7
	Coils moved by crane
MCL Entry Section	Includes the following equipment:
	 Uncoilers with coil cars
	Guide tables
	Entry Shears
	 Strip welder and notcher
	 Strip transport bridle
	Entry Accumulator
MCL Process Section	Includes the following equipment:
	Heating & Annealing Furnace
	 Coating and pre-melt molten metal pots
	 After Pot Cooling Systems
	Skin Pass Mill and Tension Leveller
	 Chemical and Resin Application
	 Strip transport bridles
MCL Exit Section	Includes the following equipment:
	 Exit Accumulator
	Strip transport bridle
	 Strip inspection station
	Exit shear
	 Recoiler with coil car

Table 3-2 MCL7 Line Configuration

3.2.3 Plant Operations

The Project will allow for cold rolled feed coils to be processed at the proposed MCL7 facility. Following delivery via truck from Port Kembla, the feed coils will be unloaded by crane and placed into the coil storage area as described above. The feed coils will then undergo a series of 14 basic steps to produce the Zincalume® steel as an output product. These steps are illustrated and summarised in **Figure 3-3** below.



- 1. The "Cold Rolled" feed coils are uncoiled into strip.
- 2. A mechanical strip shear and electric roller seam welder are used to join the next coil in the process to be joined to the previous coil.
- 3. An entry strip accumulator provides a means of "strip storage" during shearing and welding process so as to allow continuity of line operation. The accumulator uses a series of rolls mounted on a vertically moving frame.
- 4. A natural gas fired furnace cleans and elevates the temperature of the strip.
- 5. Strip temperature is then lowered as it passes through an annealing furnace.
- 6. A molten zinc/aluminium alloy is then applied to the strip by passing it through a coating metal pot containing the molten alloy. The alloy is melted in a separate pre-melt pot via electrical induction.
- 7. A desired coating mass of the strip is achieved via an air stripping process (jet stripping), which removes excess molten alloy coating.
- 8. After pot cooling of the strip is undertaken via a combination of air cooling nozzles and water quench.
- 9. Depending on product type, mill equipment is used to shape the control and flatness of the strip.
- 10. Depending on product type, passivation chemicals are applied to the strip via a roller coater and the strip are dried via a gas fired / hot air recirculation oven.
- 11. Depending on product type, resin coating is applied via a roller coater and the strip is cured via an oven.
- 12. Similar to step 3, an exit strip accumulator provides a means of "strip storage" so as to allow continuity of line operation during shearing process in step 13 below.
- 13. The strip passes through a mechanical strip shear.
- 14. The strip is then recoiled into a finished metal coated Zincalume® steel coil.

MCL7 - Process Description			F3-3	
Drawing No:	0628175s_EBP_SR_	_C002_R1.cdr	Erskine Park	1
Date:	24/05/2022	Drawing size: A4		
Drawn by:	VN	Reviewed by: DS	Client: BlueScope Steel	
			This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.	ERM

Following the completion of Step 14 (as above), the coated metal product coil is moved by crane to the despatch area where it is either transferred to CPL8 for painting, despatched to customers or for further offsite processing as "bare" Zincalume® steel. It is noted that the new MCL7 despatch building will be used for the storage and despatch of MCL7 products only, and will not be utilised for the storage of CPL8 products.

3.2.4 Operational Specifications

The CPL8 facility currently operates 24 hours a day, five days a week, however the existing approval (DA-206-8-2004-i) permits operations 24 hours a day, seven days a week (24/7). MCL7 is proposed to operate 24/7, and the operating hours of CPL8 (whilst already approved) may also synchronise with the proposed 24/7 operational hours of MCL7.

The operational specifications of the Project are summarised within **Table 3-3.** Operation of MCL7 will require the movement of products both inbound and outbound from the facility. The Project is proposed to increase the operational workforce at the WSSC by approximately 45 personnel. Any proposed workforce increases to the CPL8 facility, inclusive of the total car parking requirements for the combined CPL8 and MCL7, will be reviewed as part of the assessment of the Project.

Operational Feature	Aspect	Details
Workforce	Management team	Nine people
	Operations team	34 people
Feed Coil	Manufacture	via BlueScope's cold rolling facility at Springhill, Port Kembla
	Delivery method	via 4 new trucks
	Quantity	Up to 240 ktpa of cold rolled coils
Output Products	Feed to CPL8	160 ktpa via crane and conveyor
(nominal split)	Feed to other customers	80 ktpa via truck
Processing materials	Coating metal	~7,500 to 8,500 ingots consumed per annum

Table 3-3 Operational Specifications of MCL7

3.2.5 On-site Storage

The Project will require the expansion of the existing paint and chemical storage area at CPL8 to accommodate additional chemicals required for the operation of MCL7. The new on-site chemical storage area will be located directly west of the existing CPL8 paint and chemical storage area.

In addition, MCL7 will require the on-site storage of solid zinc and aluminium coating metal ingots which are used to feed the pre-melt pot and subsequently main pot (molten metal). The typical size and storage capacity of these ingots is specified in **Table 3-4** below. The volume of stored molten zinc/aluminium alloy will include approximately 43 tonnes within the main pot and eight (8) tonnes within the pre-melt pot.

Table 3-4 Ingot Dimensions and Storage Capacity

Specifications	Zinc Ingots	Aluminium Ingots
Dimensions (mm)	1260 x 515 x 320	1440 x 835 x 445
Weight (kg)	970	1420
Storage inventory	180	180

Details on the storage of chemicals, molten metals, and other materials and their principal uses is provided in **Table 3-5**.

Item	Storage Quantity (approx.)	Principal use
Nitric acid	1.25 kl	Quench water treatment
Hydrochloric acid	0.2 kl	Lab tests
Micro Biocide Biosperse 250 & 550	0.2 kl 0.2 kl	Cooling tower
Acrocryl 63-932 Acrocryl 63-988	2.4 kl 48 kl	Resin coat Resin coat
Okemkote F2	7 kl	Passivation
Bonderite passivant	10 kl	Passivation
Resin A4 & A3	8 kl	Resin coat
Diesel Fuel	~1kl	Emergency Generator
Hydrogen	~5000 Nm3	Furnace conditioning
Nitrogen (Cryo storage)	TBC	Furnace conditioning and purging
Molten metal (Zinc / Aluminium) ~600C	Main Pot – 43t Pre-melt Pot – 8t	Coating metal

Table 3-5 Proposed On-site Chemical/Material Storage

The existing chemical and material storage associated with the operation of CPL8 is outlined in **Table 3-6.** The quantities of existing chemicals and materials stored on site will not be increased in response to this Project.

Table 3-6	Existing On-site Chemical/Material Storage
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Chemical	Storage Quantity (kl)	Principal Use
Paint	200	Paint – top coat
Primer	120	Primer
Backer	22	Backer
Chromic acid	3	Surface preparation
Hydrochloric Acid	3	Lab tests
Sodium Hydroxide	3	Demineralising plant
Caustic Alkali – Bonderite 1402	7	Surface preparation

3.2.6 Truck Movements

Access to the WSSC facility is provided along its eastern boundary via Templar Road. The existing traffic fleet at the WSSC consists of B Double, Tri-axle, and Rigid vehicles. Current traffic movements at the WSSC comprise an average of 144 truck movements per week, which includes:

- 58 Inbound (Zincalume® steel feed coils from Springhill to WSSC) truck movements per week (~40 t per truck);
- 86 Outbound (WSSC to Customer) truck movements per week (~24.5 t per truck); and
- Seven backload (WSSC to Springhill) truck movements per week (~15.6 t per truck), with the same trucks used for bringing up the paint feed.

There will be an increase in truck movements to and from the WSSC during Project operations. Inbound truck movements will transport cold rolled feed coils into the WSSC, and outbound truck movements will transport the finished products outside of the WSSC. The proposed traffic fleet will utilise the existing B Double, Tri-axle and Rigid vehicles, with the addition of a purpose built transfer shuttle to deliver the cold rolled feed from Springhill to the WSSC. Expected traffic movements and truck loads associated with the operation of the Project are outlined in **Table 3-7**.

	1	1		
Truck movement	Material	Average truck load (tonnes)	Proposed movements per week (approx.)	Increase from existing movements
Inbound feed	Cold Rolled Coils	43	107	+49 (58 to 107)
Outbound product to customers	Painted & Bare Zincalume® steel Coils	24.5	189	+103 (86 to 189)
Backload to Springhill	Painted Coils	15.6	0	-
Total movements	-	-	296	+152

 Table 3-7
 Proposed Traffic Movements

The Project is expected to result in an estimated 152 additional movements per week, consisting of 49 inbound feed truck movements and 103 outbound truck movements. In addition, a further 10-20 movements are anticipated per week associated during operations for the purposes of hydrogen delivery, nitrogen delivery, and scrap removal.

3.2.7 Utility Supplies

Power Supply

The existing WSSC facility is supplied by two 11 kV incomers with a capacities of 5.4 and 4.2 megavolt amps (MVA). The addition of MCL7 will require the upgrading of each of the 11 kV incomers to 10 MVA rated supply. In addition, it is anticipated that MCL7 will require approximately 8 new 11/0.4 kV dry type transformers each with a capacity of 1 to 1.5 MVA, which is consistent with the standard size transformers used by BlueScope.

Natural Gas Supply

MCL7 will be supplied with natural gas from the existing natural gas supply at the WSSC, which was first installed for the construction of the CPL8 facility. It is understood that there is sufficient supply of natural gas at the WSSC, however the existing gas metering station will require upgrading to accommodate additional demand for natural gas from MCL7. The significant users of natural gas in MCL7 will include the Direct Fired Furnace and Passivation Curing Oven within the Process Section resulting in a maximum demand for natural gas for MCL7 to be estimated at approximately 1100 Nm3/hr.

Water Supply

The water supply for MCL7 will be provided via the existing water supply at the WSSC. Metering and capacity requirements will be explored further during the EIS phase.

3.3 **Project Staging**

Based on BlueScope's experiences with similar projects, a timeline of 3 - 3.5 years is expected from the commencement of the Project feasibility stage to the commencement of operations. The anticipated staging of the Project is summarised in **Table 3-8**.

Table 3-8Project Staging

Stage of Project	Estimated Date of Completion
Project Feasibility (in progress)	Late calendar year 2022
Planning and Approvals Process (in progress)	Early 2023
Construction	2023 - Late 2024
Commissioning and Operations	Mid 2025

3.4 Phases

3.4.1 Construction

Construction of the Project is anticipated to begin in 2023, subject to completion of the Planning Approvals process. All on-site construction activities are estimated to take approximately 26 months to complete, including commissioning of the Project. During the construction phase of the Project, a peak workforce of 250 to 300 full time equivalent employees is anticipated. The construction workforce will be based within a temporary on-site construction compound.

Construction of the Project is anticipated to be undertaken across six stages. A description of the construction stages, the likely equipment and machinery to be used, and the proposed duration of each stage is outlined in **Table 3-9** below.

Construction Stage	Description	Construction Equipment	Duration
1. Site Preparation	 Ground preparation and levelling Temporary construction roads 	 Bulldozers, graders, compactors, trucks 	Three months (in parallel with building works)
2. Building Works	 Foundations and footings Steel erection Cladding and sheeting New OHT cranes 	 Excavators, concrete trucks Mobile cranes, EWPs Scaffolding Structural steel and cladding 	14 months
3. Roads and drainage	 New roads and drainage connecting to existing systems 	Excavators, trucks,Concrete trucks	Four months (in parallel with building works)
4. Civil works	Equipment foundationsFloor slabs	 Piling rigs Formwork Steel reinforcement Concrete trucks/pumps 	Seven months (in parallel with building works)
5. Equipment installation	 MCL7 equipment Utilities and Services 	Mobile cranesEWPsWelding machines	Nine months (in parallel with building and civil works)

Table 3-9 Construction Staging and Equipment

Construction Stage	Description	Construction Equipment	Duration
6. Testing and Commissioning	MCL7 equipmentUtilities and Services	 Minor testing equipment 	Six months

3.4.2 **Operations**

Operations will continue for a 30-year period, minimum. During operation of the Project, the workforce at WSSC will increase by approximately 45 permanent operations and maintenance staff. Potential increases in the CPL8 throughput would further increase the workforce by up to 20 permanent operations and maintenance staff.

3.4.3 Decommissioning and Rehabilitation

The EIS prepared for the Project will discuss the potential options associated with the decommissioning of the Project upon completion of operations.

3.5 **Project Alternatives**

Alternatives to the Project have been explored, including alternative site location and layouts.

3.5.1 Alternative Site Location

An alternative site for the Project was considered at the existing BlueScope Springhill Works facility in Port Kembla, NSW. This site was considered for the proposed development, but through ongoing project pre-feasibility it was determined that the existing WSSC site was better suited for the proposed development.

Further assessment of Project alternatives will be provided throughout the EIS for the Project.

3.5.2 Alternative Site Layout Options

An alternative layout contemplating locating the Project at the northern end of the site. This option did not reflect an optimal use of the site footprint and was subsequently rejected.

4. STATUTORY CONTEXT

This section outlines the key statutory requirements for the Project under the *Environmental Planning and Assessment Act* 1979 and other relevant NSW and Commonwealth legislation with regard to the *State Significant Development Guidelines – Preparing a Scoping Report* (DPIE, 2021a).

Relevant statutory requirements for the Project will be outlined in further detail within the EIS.

4.1 **Power to Grant Consent**

Approval for the Project will be sought under Part 4, Division 4.7 of the EP&A Act, which outlines the approval pathway for development deemed to be State Significant Development (SSD). Section 4.36(2) of the EP&A Act states:

(2) A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

Power to grant consent for the Project is determined by *State Environmental Planning Policy* (*Planning Systems*) 2021 (Planning Systems SEPP). Under the provisions of Clause 2.6 (1) of the Planning Systems SEPP, a development is classified as SSD if it is specified in Schedule 1 or 2:

(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and

(b) the development is specified in Schedule 1 or 2.

Schedule 1, Clause 9 of the Planning Systems SEPP determines 'metal, mineral and extractive material processing' to be SSD if it meets the following criteria:

Development that has a capital investment value of more than \$30 million for any of the following purposes—

(a) metal or mineral refining or smelting, metal founding, rolling, drawing, extruding, <u>coating</u>, fabricating or manufacturing works or metal or mineral recycling or recovery,

- (b) brickworks, ceramic works, silicon or glassworks or tile manufacture,
- (c) cement works, concrete or bitumen pre-mix industries or related products,
- (d) building or construction materials recycling or recovery.

The Project involves development for the purpose of metal processing via coating, and will have a capital investment value of more than \$30 million. Therefore, the Project is classified as SSD under Part 4 of the EP&A Act.

4.2 Permissibility

The permissibility of the Project is determined by *State Environmental Planning Policy (Industry and Employment)* 2021 (Industry and Employment SEPP).

The WSSC is zoned *IN1 General Industrial* pursuant to Chapter 2 of the Industry and Employment SEPP. Permissible uses of the IN1 zone are outlined in **Table 4-1** below.

Zone IN1 General Industrial	Description	
1. Objectives of zone	 To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space. 	
	 To encourage employment opportunities along motorway corridors, including the M7 and M4. 	
	 To minimise any adverse effect of industry on other land uses. 	

Table 4-1 Land Use Table

Zone IN1 General Industrial	Description	
	 To facilitate road network links to the M7 and M4 Motorways. To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment. To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment-generating uses in the zone. 	
2. Permitted without consent	Nil.	
3. Permitted with consent	Building identification signs; Business identification signs; Depots; Environmental facilities; Environmental protection works; Food and drink premises; Freight transport facilities; Garden centres; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; <u>Industries (other</u> <u>than offensive or hazardous industries)</u> : Neighbourhood shops; Places of public worship; Recreation areas; Recreation facilities (indoor); Roads; Service stations; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres.	
4. Prohibited	Any development not specified in item 2 or 3.	

Under the provisions of Clause 2.10 of the Industry and Employment SEPP, 'Industries (other than offensive or hazardous industries)' are permissible with consent within the *IN1 General Industrial* zone.

Clause 3.3 of *State Environmental Planning Policy (Resilience and Hazards) 2021 (*Resilience and Hazards SEPP) defines 'offensive industry' as:

offensive industry means a building or place used to carry out an industrial activity that would, when carried out and when all measures proposed to reduce or minimise its impact on the locality have been employed (including, for example, measures to isolate the activity from existing or likely future development on other land in the locality), emit a polluting discharge (including, for example, noise) in a manner that would have a significant adverse impact in the locality or on existing or likely future development on other land in the locality.

Clause 3.3 of the Resilience and Hazards SEPP defines 'hazardous industry' as:

hazardous industry means a building or place used to carry out an industrial activity that would, when carried out and when all measures proposed to reduce or minimise its impact on the locality have been employed (including, for example, measures to isolate the activity from existing or likely future development on other land in the locality), pose a significant risk in the locality—

- (a) to human health, life or property, or
- (b) to the biophysical environment.

A Hazardous and Offensive Industry Screening Assessment (HOISA) has been completed for the Project, which is further discussed in **Section 6.7.1**. The assessment concluded that, following a Preliminary Hazard Assessment (PHA) prepared to support the DA, the Project could be deemed as 'potentially hazardous and/or offensive industry', and therefore permissible within the *IN1 General Industrial* zoning pursuant to the provisions of Clause 2.10 of the Industry and Employment SEPP.

4.3 Other Approvals

Other approvals required under relevant NSW and Commonwealth legislation (or which would be required if not for the classification of the Project as SSD) are detailed in **Table 4-2**.

Table 4-2Other Approvals required under NSW and CommonwealthLegislation

Approval Category	Legislation	Requirement
Consistent Approvals Section 4.42 of the EP&A Act outlines that these approvals cannot be refused if necessary for carrying out an approved SSD and are to be consistent with the terms of the SSD approval.	Roads Act 1993 (Roads Act)	For any works undertaken within a road reserve, the Project will require consent from the appropriate roads authority under Section 138 of the Roads Act. The impacts of the Project on roads and traffic will be assessed within the EIS.
	Protection of the Environment Operations Act 1997 (POEO Act)	Under the provisions of Schedule 1, Clause 26 of the POEO Act, activities requiring an environment protection licence (EPL) include metal coating with a capacity to process more than 10,000 tonnes of metal per year. The Project is anticipated to meet this threshold, and therefore an EPL is required for the Project.
Native Title	Native Title Act 1993 (NT Act)	Under Section 13 of the NT Act, an individual can apply to the Federal Court for a determination of native title. A review of the potential for native title will be undertaken for the Project in the EIS, however the Native Title Vision (NTV) online mapping tool (NNTT, 2022) currently indicates there are no Native Title claims over the WSSC.
EPBC Act Approval	Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Approval from the Minister for the Commonwealth Department of Agriculture, Water and the Environment (DAWE) is required for any action that will, or is likely to have a significant impact on one or more Matters of National Environmental Significance (MNES). As discussed in Section 6.3 , the Project development footprint does not support any threatened species or ecological communities and no significant habitat features have been identified. Based on the long history of vegetation clearance and disturbance, it is unlikely that the Project would result in any significant impacts on ecological values listed under the EPBC Act.
Other Approvals	Water Management Act 2000	The Project may require water access licences under the Water Management Act 2000. The soil and water assessment will identify whether any water access licences will be required for the Project.
	Biodiversity Conservation Act 2016 (BC Act)	The Project development footprint does not support any threatened species or ecological communities and no significant habitat features have been identified. Based on the long history of vegetation clearance and disturbance, it is unlikely that the Project would result in any significant impacts on ecological values listed under the BC Act. SSD applications are required to be accompanied by a Biodiversity Development Assessment Report (BDAR) under Section 7.9 of the BC Act. However, as the proposed development will not result in any significant impact on biodiversity values, a waiver to the provision of a BDAR under Section 7.9 of the BC Act has been requested.
Approval Category	Legislation	Requirement
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Approvals not required under SSD Section 4.41 of the EP&A Act states the following approvals, permits etc. are not required for an approved SSD.	Fisheries Management Act 1994	The Project will not require a dredging or reclamation work permit under Section 201, a marine vegetation regulation of harm permit under Section 205, or a passage of fish not to be blocked permit under Section 219.
	Heritage Act 1977	The Project will not require a Part 4 approval to carry out an act, matter or thing referred to in Section 57(1), or an excavation permit under Section 139.
	National Parks and Wildlife Act 1979	The Project will not require an Aboriginal heritage impact permit under Section 90.
	Rural Fires Act 1997	The Project will not require a bush fire safety authority under Section 100B, as the development does not involve subdivision for residential or rural residential development. A Bushfire Assessment will be prepared as part of the EIS.
	Water Management Act 2000	The Project will not require a water use approval under Section 89, a water management work approval under Section 90, or an activity approval (other than an aquifer interference approval) under Section 91.

4.4 Mandatory Matters for Consideration

The consent authority is required to consider a range of matters when deciding whether to grant consent for the Project. These are referred to as mandatory considerations, which are detailed in **Table 4-3** below.

Table 4-3 Mandatory Con	siderations
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Statutory Reference	Mandatory Consideration		
Considerations under	Considerations under the EP&A Act and Regulation		
Section 1.3 - Objects of the Act	 Pursuant to Section 1.3 of the EP&A Act, the Objects of the Act are: (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources, (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment, (c) to promote the orderly and economic use and development of land, (d) to promote the delivery and maintenance of affordable housing, (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage), (g) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants, (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, (j) to provide increased opportunity for community participation in environmental planning and assessment. 		
Section 4.15 - Evaluation	 Pursuant to Section 4.15 of the EP&A Act, the consent authority is required to take the following matters into consideration in determining a development application, which will be considered in the EIS: Relevant environmental planning instruments including: State Environmental Planning Policy (Planning Systems) 2021; State Environmental Planning Policy (Resilience and Hazards) 2021; 		
	 State Environmental Planning Policy (Industry and Employment) 2021; and Penrith Local Environmental Plan 2010. 		
	 Relevant development control plans including: 		

Statutory Reference	Mandatory Consideration		
	 Penrith Development Control Plan 2014 		
	 the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality; 		
	the suitability of the site for the development;		
	any submissions made in accordance with this Act or the regulations; and the subhis interset		
	The public interest.		
Considerations under	other NSW legislation		
Biodiversity Conservation Act 2016 – Section 7.14	The Minister for Planning and Homes is required to take into account the impact of the development on biodiversity values as assessed in the BDAR. The Minister may (but not required to) further consider under the Act the likely impact of the proposed development on biodiversity values.		
	As the Project will not result in any significant impact on biodiversity values, a waiver to the provision of a BDAR has been requested under Section 7.9 of the BC Act.		
Considerations under	relevant EPIs		
State Environmental Planning Policy (Industry and Employment) 2021	The Industry and Employment SEPP is the relevant Environmental Planning Instrument for the Project. Under Clause 2.6 (2) of the Industry and Employment SEPP, this SEPP prevails over LEPs:		
Employment) 2021	(2) This Chapter to prevail over LEPs In the event of an inconsistency between this Policy and a local environmental plan or deemed environmental planning instrument that applies to the land to which this Policy applies, this Policy prevails to the extent of the inconsistency.		
	The EIS will address relevant components of the Industry and Employment SEPP including:		
	 Section 2.1 – Aims of Chapter; 		
	 Section 2.10 – Zone objectives and land use table; and 		
	 Section 2.19 – Ecologically sustainable development (ESD): In relation to ESD, consistent with BlueScope's commitment to reducing its greenhouse gas emissions and Clause 2.19 of the Industry and Employment SEPP, the EIS for the Project will include an assessment of energy efficiency. 		
State Environmental Planning Policy (Resilience and Hazards) 2021 –	Chapter 3 of the Resilience and Hazards SEPP assesses the potential hazards associated with the proposed development by providing definitions and guidelines for hazardous industry, offensive industry, hazardous storage establishments, and offensive storage establishments.		
Chapter 3	In accordance with Clause 3.7 of the Resilience and Hazards SEPP, consideration will be given to current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, including:		
	 Hazardous Industry Planning Advisory Paper No 3 – Risk Assessment; and 		
	 Hazardous Industry Planning Advisory Paper No 12 – Hazards 		
	In addition, a preliminary risk screening assessment will be undertaken for the Project at the EIS phase in accordance with Chapter 3 of the Resilience and Hazards SEPP.		
State Environmental Planning Policy (Resilience and Hazards) 2021 – Chapter 4	Chapter 4 of the Resilience and Hazards SEPP provides a state wide planning approach to the remediation of contaminated land. Under Clause 4.6 (1) of the Resilience and Hazards SEPP, a consent authority is required to consider whether a proposed development site is affected by soil or other contaminants before granting consent. An assessment will be prepared as part of the EIS to determine the potential contamination risk associated with the Project. The assessment will take into		
	consideration historical land use that may have resulted in contamination within and surrounding the WSSC.		
Penrith Local Environmental Plan 2010	The WSSC is situated within the City of Penrith LGA, where the relevant LEP is the Penrith Local Environmental Plan 2009 (Penrith LEP). However, as the relevant EPI is the Industry and Employment SEPP, the Penrith LEP does not apply to the Project.		

Statutory Reference	Mandatory Consideration			
Considerations under Development Control Plans				
Penrith Development Control Plan 2014	The Penrith Development Control Plan 2014 (Penrith DCP) is the relevant DCP that supports the controls contained within the Penrith LEP under the provisions of Division 3.6 of the EP&A Act.			
	Under Clause 2.10 of the Planning Systems SEPP, DCPs do not apply to SSD projects:			
	11 Exclusion of application of development control plans			
	Development control plans (whether made before or after the commencement of this Policy) do not apply to—			
	(a) <u>State significant development</u> , or			
	(b) development for which a relevant council is the consent authority under section 4.37 of the Act.			
	The Project will be classified as SSD. As such, the Penrith DCP does not apply and is not a mandatory consideration for the Project.			
Considerations under	existing licences and approvals			
SSD Approval DA206-8-2004-I and	The existing WSSC and CPL8 facility is subject to SSD Approval DA206-8-2004-I and Environment Protection Licence (EPL) No. 12495.			
Environment Protection Licence (EPL) No. 12495.	DA206-8-2004-I was originally approved on 3 December 2004 and has since been subject to six modifications, which are further discussed in Section 6.12.1 . The most recent modification (MOD 6) was approved on 12 September 2017, which increased the night-time sleep disturbance limit from 47dB to 54dB and removed operational noise limits.			
	Consideration will be given to the existing conditions of consent under DA206-8-2004-i MOD 6 in relation to EPL No. 12495, including (but not limited to):			
	 2.4 – The applicant must comply with all air emission discharge limits and requirements as specified by the EPA in the EPL(s) for the site. 			
	2.6 – Offensive odours shall not be emitted from the development unless potentially offensive odours are identified in an EPL and the odours are emitted in accordance with conditions specifically directed at minimising the odours.			
	 2.25 - Except as provided by an EPL, only the hazardous and/or industrial and/or Group A waste listed (a) to (h) below may be generated and/or stored at the development. The quantity of hazardous and/or industrial and/or Group A waste generated and/or stored at the premises must not exceed 750 tonnes per year. Waste oil/water, hydrocarbons/water mixtures or emulsions; Chromium compounds (hexavalent and trivalent); Non toxic salts; Acidic solution or acids in solid form; Basic solutions or bases in solid form; Waste mineral oils unfit for their intended use; Wastes from the production, formulation and use of inks, dyes, pigments, paints, lacquers and varnishes; and Containers and drums which are contaminated with residues of substances referred to in this list. 			
	specified by the EPA in the EPL(s) for the site.			

Statutory Reference	Mandatory Consideration		
Considerations under the EP&A Act and Regulation			
Section 1.3 - Objects of the Act	 Pursuant to Section 1.3 of the EP&A Act, the Objects of the Act are: (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources, (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment, (c) to promote the orderly and economic use and development of land, (d) to promote the delivery and maintenance of affordable housing, (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage), (g) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants, (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, (j) to provide increased opportunity for community participation in environmental planning and assessment. 		
Section 4.15 - Evaluation	 Pursuant to Section 4.15 of the EP&A Act, the consent authority is required to take the following matters into consideration in determining a development application, which will be considered in the EIS: Relevant environmental planning instruments including: State Environmental Planning Policy (Planning Systems) 2021; State Environmental Planning Policy (Resilience and Hazards) 2021; State Environmental Planning Policy (Industry and Employment) 2021; and Penrith Local Environmental Plan 2010. 		
	 Relevant development control plans including: Penrith Development Control Plan 2014 the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality; the suitability of the site for the development; any submissions made in accordance with this Act or the regulations; and the public interest. 		
Considerations under other NSW legislation			
Biodiversity Conservation Act 2016 – Section 7.14	The Minister for Planning and Homes is required to take into account the impact of the development on biodiversity values as assessed in the BDAR. The Minister may (but is not required to) further consider under the Act the likely impact of the proposed development on biodiversity values. As the Project will not result in any significant impact on biodiversity values, a waiver to the provision of a BDAR has been requested under Section 7.9 of the BC Act.		
Considerations under relevant EPIs			
State Environmental Planning Policy (Industry and Employment) 2021	 The Industry and Employment SEPP is the relevant Environmental Planning Instrument for the Project. Under Clause 2.6 (2) of the Industry and Employment SEPP, this SEPP prevails over LEPs: (2) This Chapter to prevail over LEPs In the event of an inconsistency between this Policy and a local environmental plan or deemed environmental planning instrument that applies to the land to which this Policy applies, this Policy prevails to the extent of the inconsistency. The EIS will address relevant components of the Industry and Employment SEPP including: Section 2.1 – Aims of Chapter; Section 2.10 – Zone objectives and land use table: and 		
	 Section 2.19 – Ecologically sustainable development (ESD): 		

Statutory Reference	Mandatory Consideration		
	 In relation to ESD, consistent with BlueScope's commitment to reducing its greenhouse gas emissions and Clause 2.19 of the Industry and Employment SEPP, the EIS for the Project will include an assessment of energy efficiency. 		
State Environmental Planning Policy (Resilience and Hazards) 2021 – Chapter 3	Chapter 3 of the Resilience and Hazards SEPP assesses the potential hazards associated with the proposed development by providing definitions and guidelines for hazardous industry, offensive industry, hazardous storage establishments, and offensive storage establishments.		
	In accordance with Clause 3.7 of the Resilience and Hazards SEPP, consideration will be given to current circulars or guidelines published by the Department of Planning relating to hazardous or offensive development, including:		
	 Hazardous Industry Planning Advisory Paper No 3 – Risk Assessment; and 		
	 Hazardous Industry Planning Advisory Paper No 12 – Hazards 		
	In addition, a preliminary risk screening assessment will be undertaken for the Project at the EIS phase in accordance with Chapter 3 of the Resilience and Hazards SEPP.		
State Environmental Planning Policy (Resilience and Hazards) 2021 – Chapter 4	Chapter 4 of the Resilience and Hazards SEPP provides a state wide planning approach to the remediation of contaminated land. Under Clause 4.6 (1) of the Resilience and Hazards SEPP, a consent authority is required to consider whether a proposed development site is affected by soil or other contaminants before granting consent. An assessment will be prepared as part of the EIS to determine the potential		
	contamination risk associated with the Project. The assessment will take into consideration historical land use that may have resulted in contamination within and surrounding the WSSC.		
Penrith Local Environmental Plan 2010	The WSSC is situated within the City of Penrith LGA, where the relevant LEP is the Penrith Local Environmental Plan 2009 (Penrith LEP). However, as the relevant EPI is the Industry and Employment SEPP, the Penrith LEP does not apply to the Project.		

Statutory Reference	Mandatory Consideration			
Considerations under Development Control Plans				
Penrith Development Control Plan 2014	The Penrith Development Control Plan 2014 (Penrith DCP) is the relevant DCP that supports the controls contained within the Penrith LEP under the provisions of Division 3.6 of the EP&A Act.			
	Under Clause 2.10 of the Planning Systems SEPP, DCPs do not apply to SSD projects:			
	11 Exclusion of application of development control plans			
	Development control plans (whether made before or after the commencement of this Policy) do not apply to—			
	(a) <u>State significant development</u> , or			
	(b) development for which a relevant council is the consent authority under section 4.37 of the Act.			
	The Project will be classified as SSD. As such, the Penrith DCP does not apply and is not a mandatory consideration for the Project.			
Considerations under	existing licences and approvals			
SSD Approval DA206-8-2004-I and	The existing WSSC and CPL8 facility is subject to SSD Approval DA206-8-2004-I and Environment Protection Licence (EPL) No. 12495.			
Environment Protection Licence (EPL) No. 12495.	DA206-8-2004-I was originally approved on 3 December 2004 and has since been subject to six modifications, which are further discussed in Section 6.12.1 . The most recent modification (MOD 6) was approved on 12 September 2017, which increased the night-time sleep disturbance limit from 47dB to 54dB and removed operational noise limits.			
	Consideration will be given to the existing conditions of consent under DA206-8-2004-i MOD 6 in relation to EPL No. 12495, including (but not limited to):			
	 2.4 – The applicant must comply with all air emission discharge limits and requirements as specified by the EPA in the EPL(s) for the site. 			
	2.6 – Offensive odours shall not be emitted from the development unless potentially offensive odours are identified in an EPL and the odours are emitted in accordance with conditions specifically directed at minimising the odours.			
	 2.25 - Except as provided by an EPL, only the hazardous and/or industrial and/or Group A waste listed (a) to (h) below may be generated and/or stored at the development. The quantity of hazardous and/or industrial and/or Group A waste generated and/or stored at the premises must not exceed 750 tonnes per year. Waste oil/water, hydrocarbons/water mixtures or emulsions; Chromium compounds (hexavalent and trivalent); Non toxic salts; Acidic solution or acids in solid form; Basic solutions or bases in solid form; Waste mineral oils unfit for their intended use; Wastes from the production, formulation and use of inks, dyes, pigments, paints, lacquers and varnishes; and Containers and drums which are contaminated with residues of substances referred to in this list. 			
	specified by the EPA in the EPL(s) for the site.			

5. COMMUNITY ENGAGEMENT

5.1 Engagement Overview

5.1.1 Engagement Principles

Best practice engagement involves the community and stakeholders in all decision-making stages of a proposal. The community plays a role from conception, through the assessment process and on to the construction and operational phases of a proposal. Effective community consultation has three important functions:

- 1. Facilitate deeper understanding of potential issues and decisions required for a proposal;
- 2. Enhance the quality of decisions made for a proposal; and
- 3. Allow people to contribute to decisions that affect their lives.

BlueScope's community engagement approach is based on living up to 'Our Bond', which is the company's set of guiding principles that outline how 'we choose to do what is right' and that 'our local communities are our homes'. BlueScope prides itself on upholding its strong reputation by being a good corporate citizen. Furthermore, in August 2020, BlueScope announced its new Purpose and Corporate Strategy, which reinforced the commitment to 'Strengthening our Communities'.

According to Reptrak, who produce the Corporate Reputation Index globally, BlueScope has a very 'Strong' reputation in Australia. Out of the Top 60 companies in Australia, BlueScope has consistently ranked in the top 10 to 20 and is the leading manufacturer/industrial company amongst the Benchmark 60.

5.1.2 Engagement Context

The engagement approach for the Project recognises the unique characteristics of Erskine Park, due to the location of the WSSC within an industrial precinct on the southern outskirts of the suburb. The existing WSSC operation was commissioned 15 years ago, at the time being one of the first industrial facilities located in the Erskine Business Park. Today, the precinct contains a range of light to heavy industrial uses and is a key business park with easy access to a broad range of Western Sydney markets.

Erskine Park, along with Colyton, are the easternmost suburbs in the Penrith LGA, located 42 km west of the Sydney CBD in the Mulgoa State electorate and McMahon Federal division. The residential area of Erskine Park is located approximately 780 m from the Project (at the closest receptor point) and has a population of approximately 6,500 residents.

5.1.3 Stakeholder Engagement Strategy

BlueScope has demonstrated a commitment to engaging proactively with the local community and gaining an appreciation for the community's needs, concerns and aspirations. To facilitate this commitment, BlueScope has developed a targeted Stakeholder Engagement Strategy (SES) (**Appendix B**) to support the scoping stage and inform the EIS stage of the Project.

The engagement objectives in the SES are to:

- 1. Facilitate targeted consultation with nearby neighbours and specifically identified stakeholders;
- 2. Gather community and stakeholder feedback to inform the scoping report;
- 3. Identify and analyse any community and stakeholder concerns that need to be considered in the Project planning and delivery; and
- 4. Support BlueScope in maintaining a positive corporate image.

5.2 Scoping Phase Engagement

5.2.1 Stakeholder Identification

The SES (**Appendix B**) has been designed to enable community members to be part of the Project planning and development process and to provide them with the opportunity to engage in a meaningful way.

Stakeholder identification was undertaken in the SES as part of the scoping phase for the Project, and a summary of the Project stakeholders is outlined in **Table 5-1**. The intention of the broader stakeholder assessment is to inform how communications and engagement will occur beyond the scoping phase to support the proposal through its planning and delivery.

An aerial assessment of adjacent and nearby neighbours indicated that there are 26 commercial properties located within the Erskine Business Park near the WSSC. Of the 26 properties, 13 are located on land adjoining the WSSC. These properties and the associated buildings/facilities became the primary focus for the scoping engagement activities, noting that discussions later confirmed that some properties were under common ownership.

Stakeholder group	Targeted stakeholders	Key areas of concern	
Adjacent Neighbours	13 commercial premises – EHI Australia, CBRE, Orafol Australia, Cleanaway, Digital Realty, Bevchain, Darley Aluminium Trading, Coles – retail ready operations, Goodman Fielder, Icehouse logistics, Regen Global, Samsung SDS and Scott's Refrigeration Logistics.	 Property impacts Visual impacts Transport / pedestrian access impacts or changes Environmental changes Community benefits Construction impacts 	
Nearby Neighbours	 Erskine Business Park businesses and organisations (a further 13 commercial premises) 	 Transport access impacts or changes Environmental changes Community benefits Regional economic development 	
Broader Community and Region	 Emmaus Catholic College Mamre Anglican School Trinity Primary School Catholic Healthcare Emmaus Retirement Village All located within 800 metres of the WSSC 	 Property impacts Visual impacts Access changes Environmental changes Community benefits Governance and ownership of the developing entity Transport access impacts or changes 	
Representative or Special Interest Groups	 Western Sydney Aerotropolis Registered Aboriginal Groups 	 Property impacts Site landscaping Environmental changes (emissions, disturbance, cultural heritage) Obstacle Limitation Surface (OLS) 	

Table 5-1 Project Stakeholders

Stakeholder group	Targeted stakeholders	Key areas of concern	
Government Agencies and Elected Representatives	 Member for Western Sydney, Stuart Ayres Member for McMahon, Chris Bowen Member for Mulgoa, Tanya Davies Penrith City Council Environment Protection Authority (EPA) 	 Community benefit Assessment process Consideration of impacts Consideration and mitigation of concerns Consultation process Environmental changes and proposed mitigation / management strategies 	
BlueScope Employees (WSSC)	 80 FTE WSSC employees Employees of the broader BlueScope Australian Steel Products business 	 Assessment process Community benefit Regional economic development Operational considerations (i.e. hours of operations and rostering) 	

5.2.2 Engagement Activities

Engagement activities were undertaken as part of the scoping phase to discuss the Project with targeted stakeholders and to build an understanding of potential concerns and opportunities. It also aimed to gather information that could inform the broader communication required to support the development application and delivery stages. Evidence of consultation activities undertaken to date are provided in **Appendix C**.

Broader engagement will occur as per the SES (**Appendix B**) following submission of the Scoping Report and issuing of the Project SEARs. This will involve engaging the broader community, including relevant industry and local community groups and organisations, to help achieve broader understanding of the Project, capture potential issues and opportunities, and work through potential mitigation measures if required. It will also provide an opportunity to secure a positive long-term relationship with the local community and regional stakeholders.

5.2.2.1 Government and Key Stakeholders

Details of consultation undertaken with government agencies and key stakeholders during the scoping phase is outlined in **Table 5-2**.

Stakeholder	Date and Type	Purpose and Outcomes
Western Sydney Aerotropolis	27 April 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, outline the consultation and planning approval steps, and identify early constraints and design considerations.
	27 April 2022 Online (Teams) meeting to discuss aviation safeguards website and early considerations for design post receipt of Project SEARs.	 To better understand the aviation safeguards website and early considerations for design following the issuing of Project SEARs.
	10 May 2022 Site meeting (Western Sydney Aerotropolis)	 To understand any overlapping stakeholders and engagement considerations during and post Project scoping phase.
Penrith City Council	28 April 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, identify early feedback and concerns and offer online or face-to-face meeting / site visit.

Table 5-2Summary of Consultation Events – Government and KeyStakeholders

Stakeholder	Date and Type	Purpose and Outcomes	
	16 May 2022 Meeting		To introduce the Project, inform of engagement activities completed to date, and discuss the proposed pre-lodgement meeting with members of the State Design Panel.
Member for Mulgoa – Tanya Davies	28 April 2022 Phone call to discuss Project and offer a face-to-face meeting	•	To introduce the Project, inform of engagement activities completed to date / stakeholder feedback, and invite face-to-face meeting / site visit.
	5 May 2022 Meeting	•	To provide an overview of the Project, inform of engagement activities completed to date / stakeholder feedback, and understand any key areas of concern / consideration during and post lodgement of the Scoping Report.
		•	The briefing was well received with feedback highly supportive of the job creation, support of product growth, and availability in the Western Sydney residential and commercial markets. Ongoing Project updates and briefings during the EIS stage will be offered.
Member for Western Sydney –	29 April 2022 Phone call to discuss Project and offer a face-to-face meeting	-	To introduce the Project, inform of engagement activities completed to date / stakeholder feedback, and invite face-to-face meeting / site visit.
Stuart Ayres		•	A follow up request via email was sent 29 April 2022 to offer an online/in person briefing. No response has been received to date.
Member for McMahon – Chris Bowen	29 April 2022 Phone call to discuss Project and offer a face-to-face meeting		To introduce the Project, inform of engagement activities completed to date / stakeholder feedback, and invite face-to-face meeting / site visit.
	5 May 2022 Email	•	Confirmation email outlining the Minister's briefings were exhausted until after the Federal election.
		•	BlueScope agreed to request and organise a briefing after the 2022 Federal election held late May.
EPA	24 May 2022 Online and in person meeting	•	To introduce the Project, outline key environmental aspects and understand any initial concerns, and receive feedback prior to lodging the project Scoping Report. The Project was well received by the EPA attendees
			(comprising of the Wollongong and Parramatta branch representatives).
		-	 Areas of interest included: The hours of operation for the MCL7 The pollution control equipment which would be used at the MCL7 (this was not known at the time and will be available following the commencement of the EIS studies). The existing water discharge arrangement and whether it would support the proposed MCL7 operations. BlueScope outlined that the existing arrangement would continue and that further work is proposed to be implemented to manage the stormwater run-off at the Project Site. The EPA commented that there may be construction noise limits for the Project and the SEARs will include GHG considerations.
		-	the domestic benefits from the manufacture of/and end-use of key building and construction products.

5.2.2.2 Community Engagement

Details of consultation undertaken with the community during the scoping phase is outlined in **Table 5-3**.

Stakeholder	Date and Type	Purpose and Outcomes		
Adjacent Neighbours	2 – 5 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, identify early feedback and concerns, and offer online or face-to-face meeting / site visit. Of the 13 adjacent businesses, 12 were able to be reached. No concerns were raised by this group with feedback being highly supportive of the Project. The majority were keen to be kept updated on the progress of the application and accepted the offer of a briefing when the environmental studies are complete. Key areas of interest included ensuring ongoing accessibility to each business (for freight and staff) during the construction activities and management of expected construction impacts such as dust and noise considerations. The remaining business that was unable to be reached was left three voicemails (3 May, 10 May and 17 May). A doorknock was attempted on 10 May however was unsuccessful due to site security/accessibility issues. 		
Nearby Neighbours	2 – 5 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, identify early feedback and concerns, and offer online or face-to-face meeting / site visit. Of the 13 nearby neighbours (excluding adjacent businesses), four were briefed on the Project, eight were unable to be reached, and one was left three voicemail messages (5 May, 10 May and 17 May). Of the four businesses that were briefed, all were supportive of the Project. No key concerns were raised, and all wished to be kept informed of the Project and briefed following the preparation of the EIS. The remaining businesses were attempted to be door-knocked on 10 May, however this was unsuccessful due to the site security in place at each operation. Calls and investigation of appropriate email contacts will continue post submission of the Scoping Report. 		
Adjacent Neighbour – Western Boundary	10 May 2022 Meeting	 To follow up on the initial phone call and offer a more detailed overview of the company's operations and the Project. Develop stakeholder relationships to support subsequent stages. These discussions demonstrated support for the Project, as well as a useful understanding of key interests to engage on once the environmental studies have been completed including proposed construction activities, emissions, and water use (once operational). 		
Mamre Anglican School	10 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, inform of engagement activity completed to date / stakeholder feedback, and invite face-to-face meeting / site visit. Briefing held with school Administrator and shared with Principal post briefing. No concerns were raised, and the school requested updates via email as the Project processes and where relevant. 		
Emmaus Catholic College	10 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, inform of engagement activities completed to date / stakeholder feedback, and invite face-to-face meeting / site visit. Briefing held with School Principal. While no concerns were raised, the Principal asked that traffic congestion and mitigation activities be considered during school drop-off and pick-up times. Further Project updates were requested via email as the Project processes, and where relevant. 		

 Table 5-3
 Summary of Consultation Events – Community

Stakeholder	Date and Type	Purpose and Outcomes
Trinity Primary School	11 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, inform of engagement activities completed to date / stakeholder feedback, and invite face-to-face meeting / site visit. Briefing held with School Principal. The Principal was supportive of the Project and asked that during the construction phase of the Project, adequate mitigation activities be considered to reduce further congestion on main roads used during school drop off/pick up times. Further Project updates were requested via email as the Project processes, and where relevant.
Catholic Healthcare Emmaus Retirement Village	11 May 2022 Phone call to discuss Project and offer a face-to-face meeting	 To introduce the Project, inform of engagement activity completed to date / stakeholder feedback, and invite face-to-face meeting / site visit. No concerns were raised, and the centre requested updates via email as the Project processes and where relevant.
Adjacent Neighbour – Southern Boundary	17 May 2022 Meeting	 To follow up on the initial phone call and offer a more detailed overview of the company's operations and the Project. Develop stakeholder relationships to support subsequent stages. These discussions demonstrated support for the Project, as well as a useful understanding of key interests to engage on once the environmental studies have been completed including proposed construction activities such as traffic management, dust, noise and earthworks consideration.
Adjacent Neighbour – Northern Boundary	18 May 2022 Meeting	 To follow up on the initial phone call and offer a more detailed overview of the company's operations and the Project. Develop stakeholder relationships to support subsequent stages. These discussions enabled further clarification on the proposed Project including the proposed location and construction methodology. Other points of discussion included understanding key concerns during the construction period such as maintaining access to power, construction traffic and vibration. A follow up briefing will be held when the environmental studies have been completed.
WSSC Employees	17, 24, 31 May 2022 Meetings	To provide further detail on the Project, the planning assessment process and work completed to date (as part of the scoping work). Delivered as part of a formal briefing, the session was incorporated into the weekly training meeting to ensure all employees received the Project briefing and had the opportunity to raise any questions. The Project was well received with the workforce excited about the opportunities it presents. Further briefings will be held throughout each stage of the NSW Government Planning Approvals process.

The stakeholder and community discussions identified strong support for the Project. All those engaged commented on the appropriate location for the Project, given the existing location of the WSSC and vacant adjoining land parcel. Many commented on the significant project investment value, job creation, and increase in product output within the Western Sydney region.

The stakeholders were asked to identify any issues or areas for clarification as the planning progresses, which were largely consistent in each conversation. A summary of the key issues identified by the community and details of feedback received is summarised in **Table 5-4**.

Торіс	Feedback Received	Assessment Methodology	
Traffic and Access	 Congestion during school pick-up and drop-off times. Overcrowding of heavy vehicles along Templar Road. Construction traffic impacting visibility of turning vehicles exiting / entering other sites on Templar Road. Maintaining pedestrian access along Templar Road at all times (it was identified that several nearby businesses' staff use public transport to get to/from work). 	 Potential impacts of the Project on traffic and access will be assessed within the Traffic Impact Assessment prepared for the EIS. Further discussion is provided in Section 6.5. 	
Construction Management	 Construction noise (particularly on the southern boundary of the WSSC). Construction vibration and associated impacts on commercial data centre. Construction dust and impact on employee / other site vehicles. Maintaining access to power at all times (considering location of existing power lines and poles). Managing earthworks overflow (particularly during periods of rainfall). This is especially relevant to the southern boundary of the WSSC. 	 Potential impacts of construction noise, vibrations, and dust will be assessed within the Noise and Vibration Impact Assessment and Air Quality Impact Assessment prepared for the EIS. Further discussion is provided in Section 6.2.2 and Section 6.10. 	
Environmental Management – Landfill	 Understanding the ground composite prior to commencing earthwork activities. 	 Landfill considerations will be assessed within the Landfill Gas Assessment prepared for the EIS. Further discussion is provided in Section 6.9. 	
Environmental Management – Emissions	GHG emissions.Sources of emissions.Emission visibility.	 Emissions from the Project will be assessed within an Air Quality Impact Assessment prepared for the EIS. Further discussion is provided in Section 6.10. 	
Environmental Management – Water	 Water discharge site and site overflow location. Chemical discharge. Risk of contamination. 	 Potential impacts of the water will be assessed within the Water Impact Assessment prepared for the EIS. Further discussion is provided in Section 6.8. 	
Air Traffic Considerations – Landscaping	 Selection of tree and plant species and associated impact on wildlife (particularly birdlife). This is a key concern of the Western Sydney Aerotropolis and promoting additional birdlife to the area which will increase the likelihood of bird strikes. 	 Landscaping considerations and requirements will be addressed within the Landscape and Visual Impact Assessment prepared for the EIS. Further discussion is provided in Section 6.2.1. 	

Table 5-4 Key Issues Summary

Торіс	Feedback Received	Assessment Methodology		
Air Traffic Considerations – OLS	The WSSC is located approximately 800 m northwest of the northern approach runway at the Western Sydney Airport, and is affected by the Obstacle Limitation Surface (OLS) of the airport.	 Potential impacts of the Project on the OLS of Western Sydney Airport will be assessed within the Airspace Risk Assessment prepared for the EIS. The Project will also require an approval from the Western Sydney Airport Corporation to carry out a Controlled Activity within the airport's protected airspace. Further discussion is provided in Section 6.7.2. 		
Reporting Requirements	 Consideration of how the Project would feed into existing annual environmental management plan reporting requirements. 	 Reporting requirements are to be determined as part of the conditions of consent. 		

5.3 Proposed Engagement

Broader engagement will occur during the EIS phase to inform and gain feedback from the current identified stakeholder list and other stakeholder groups located in the community. The SES (**Appendix B**) outlines the details of stakeholder consultation that will be undertaken during the preparation of the EIS, which includes the following activities:

- establishment of a Project website and dedicated contact points;
- open house information sessions promoted through public notice in the local newspaper;
- online survey to capture broader opinion and feedback;
- distribution of Project updates and fact sheets;
- stakeholder emails (targeted);
- meetings with identified schools and aged care facilities;
- ongoing Council and DPE meetings (including other agencies as outlined by the SEARs);
- ongoing meetings with adjacent and nearby businesses and organisations;
- ongoing internal engagement with the WSSC workforce;
- meetings with elected officials; and
- development of a range of engagement channels for viewing information on the Project, including podcasts, animations / videos and icon displays.

There are opportunities to develop positive and collaborative relationships with the community and Project stakeholders. This relationship can be developed meaningfully by continuing to share information on the Project, clarifying key areas, and demonstrating how feedback has been applied to the Project.

BlueScope has a longstanding history of supporting the communities in which it operates, and the Project would benefit from increased support to community groups and community facilities located in Erskine Park and surrounding suburbs. These opportunities will be investigated following submission of the Scoping Report.

6. PROPOSED ASSESSMENT OF IMPACTS

6.1 Categorisation of Assessment Matters

This section outlines matters requiring further assessment in the EIS, the level of assessment that should be undertaken for each matter, and the proposed assessment approach.

A preliminary environmental assessment was undertaken to identify the potential matters associated with the proposed construction and operation of the Project. The following were considered in the identification of matters requiring further assessment in accordance with the Scoping Report Guidelines:

- the scale and nature of the likely impacts of the Project and the sensitivity of the receiving environment;
- whether the Project is likely to generate cumulative impacts;
- the ability to avoid, minimise and/or offset the impacts of the Project, to the extent known at the scoping stage; and
- the complexity of the technical assessment of the Project.

Each matter and its proposed level of assessment (detailed or standard) is identified in **Table 6-1**. Detailed assessments include environmental aspects that present a potential high constraint to the development, and other aspects which require detailed assessment, but do not pose a high risk constraint. In addition, the matters have been categorised to align with those identified in the Scoping Report Guidelines. A Scoping Summary Table has been included in **Appendix A**.

The key matters requiring more detailed assessments have been identified based on a preliminary assessment of the Project.

Level of Assessment	Aspect
Detailed	Access – Traffic and Transport Hazards and Risks – Preliminary Hazard Analysis Air Quality
Standard	Amenity – Visual Amenity – Noise Biodiversity Heritage – Aboriginal Cultural and Historic Social Hazards and Risks – Airspace Hazards and Risks – Contamination Hazards and Risks – Bushfire Water Resources Land Resources

Table 6-1Proposed Assessment

The EIS will be prepared in accordance with the SEARs to be issued by DPE in response to this Scoping Report, and will incorporate the issues which have been outlined in **Table 6-1** above. All assessments (including specialist assessments) will be completed by taking into consideration the outcomes of consultation with stakeholders and industry best practice guidelines.

6.2 Amenity

6.2.1 Visual

6.2.1.1 Existing Environment

The WSSC is zoned *IN1 General Industrial* and is located within an existing industrial area. The closest residential areas to the site are located approximately 780 m to the north of the WSSC in Erskine Park. These residential areas are separated from the WSSC and the broader industrial area by an electricity easement which varies in width between 130-160 m.

Construction of the Project has the potential to create temporary visual impacts at sensitive visual receptors such as residences, roads, and open areas. However, these impacts would be limited in their extent and duration.

Operation of the Project may have the potential to create longer lasting visual impacts. Three (3) exhaust stacks proposed for the Project, which would have potential to create visual impacts for nearby receivers. These include:

- a furnace stack at a height of approximately 39 m above ground level (agl);
- a passivation stack at a height of approximately 33 m agl; and
- a resin stack at a height of approximately 31 m agl.

MCL7 will be visually integrated within the existing industrial character of the WSSC site and its surrounding areas, which will minimise visual impacts on built form from the Project.

6.2.1.2 Assessment Approach

A Landscape and Visual Impact Assessment (LVIA) will be prepared to consider the potential visual impacts of the Project from sensitive visual points both in the immediate vicinity and the wider region. The assessment will examine the sensitivity of the landscape and capacity to incorporate the Project without further visual impact. The assessment will also identify measures to avoid, mitigate and manage the potential impacts during construction and operation.

The purpose of the LVIA is to determine the potential impact of the proposed development in the context of the existing character and provide recommendations for mitigation of any potential impacts identified, and includes the following key steps:

- 1. A review of existing relevant base data, including aerial photography, as well as the proposed works and review of relevant sub-consultants reports and existing planning policies;
- 2. Discussion of specific concerns in regards to visual impact through liaison with the proponent, relevant sub-consultants and relevant authorities and stakeholders;
- 3. A site visit and photographical survey; and
- 4. Preparation of draft written LVIA report including relevant figures, recommendations on improvements to the visual character through mitigation methods and diagrams.

6.2.2 Noise

6.2.2.1 Existing Environment

The WSSC is located at 25-55 Templar Road, Erskine Park, NSW and is surrounded by other industrial developments. The nearest sensitive receptors outside the WSSC are 780 metres to the north and are identified as suburban residential. The locations of the nearest sensitive receptors to the WSSC are shown in **Figure 2-1**.

6.2.2.2 Potential Operational Noise Impacts

A qualitative operational noise and vibration assessment was prepared to understand the potential noise and vibration constraints in relation to the operation of MCL7. The assessment also provides recommendations for mitigation measures, where necessary.

The assessment was based on preliminary information provided by BlueScope including the following drawings, and applicable noise standards and guidelines:

- MCL7 Project RFI Response, BlueScope, dated 11 February 2022;
- Western Sydney Service Centre Paint Line Noise Compliance Monitoring 2021, SLR Consulting, March 2021;
- Determination of Development DA-206-8-2004-i, 3 December 2004; and
- Protection of the Environment Operations Act (POEO Act) 1997.

The assessment criteria, prediction method, and assumptions used to assess the potential noise impact of the proposed MCL7 are summarised as follows.

Assessment Criteria

Section 2.8 of the BlueScope Steel Paintline & Service Centre modified Conditions of Approval (DA-206-8-2004-i MOD 6) outlines noise limits which are considered applicable for the purposes of understanding characteristics associated with the MCL7 Project. The noise limits are reproduced in **Table 6-2** below. The noise limits are applicable to the nearest sensitive receptors outside of WSSC.

Table 6-2 Determination of DA noise limits

Time of day	Descriptor	Acoustic quality objectives (measured at the receptor)		
Day, Evening and Night	LAeq,15min	≤35 dBA		
Night (Night time sleep disturbance)	LA1,1min or LA max	≤54 dBA		

Assumed Source Noise Levels

For the preliminary assessment, a reverberant sound pressure level of 85 dBA L_{eq} is expected and assumed within the MCL facility to meet the SafeWork Code of Practice under section 274 of the Work Health and Safety Act 2011 (the WHS Act). Based on ERM's experience at similar facilities, the L_{A1} parameter has been assumed to be no greater than 10 dB higher than the L_{Aeq} level, resulting into a maximum level of 95 dBA L_1 .

Prediction Method and Conservative Assumptions

The noise impact of the MCL7 facility has been predicted at the nearest receptor to the north of the Project using conservative noise propagation formulae as applied to a vertical plane source. No adjustments have been made for ground factor, meteorological conditions, or building shielding (either within site or externally).

All operational activities (not including unloading of materials such as ingot blocks and chemicals) associated with the MCL7 facility have been assumed to be within an enclosed space surrounded by solid walls, with 10% of the façade comprised of non-acoustic louvres or openings.

Predicted Noise Levels at Nearest Residential Receptor

The nearest sensitive receptor is approximately 780 metres from the boundary of the WSSC, and 900 metres from the MCL7 facility. Based on this distance, the predicted noise levels at the nearest residential community are presented in **Table 6-3.** Predictions are noted to be conservative, thus based on the operation of the MCL7, compliance is predicted to be achieved.

 Table 6-3
 Predicted Noise Levels at Nearest Residential Receptor

Descriptor	Predicted level at nearest receptor	Acoustic quality objectives (measured at the receptor)	Margin of Compliance	
LAeq,15min	≤29 dBA	≤35 dBA	≥6 dB	
LA1,1min	≤39 dBA	≤54 dBA	≥15 dB	

Predicted Traffic Noise Impact

The proposed MCL7 is expected to generate an additional 49 inbound truck movements per week, and 103 outbound truck movements per week, as compared to the current traffic flows.

Assuming truck movements are uniformly distributed during the day, the increase is the equivalent of less than one additional truck movement per hour. Based on this assumption, compared to existing traffic flows on the non-residential road network, this will result in a negligible increase to traffic noise levels.

It is expected that the residential road network will not be used by trucks from the MCL7 facility in the night-time period, thus reducing the risk of sleep disturbance at the residential community to the north.

Summary of Operational Noise Impacts

Based on the conservative assumption of the preliminary assessment, compliance with noise requirements is predicted for the proposed operations of MCL7. The Project is predicted to have an insignificant impact in the locality, and on the existing and future development on nearby land zones in the locality.

6.2.2.3 Assessment Approach

A Noise and Vibration Impact Assessment (NVIA) will be prepared to address the noise and vibration impacts of the Project across both its construction and operational stages.

The NVIA will include an assessment of:

- operational impact;
- construction impact; and
- operational and construction road traffic noise impact.

The NIVA will be prepared in accordance with the following standards and guidelines:

- EPA NSW Noise Policy for Industry (NPI) 2017;
- The NSW Department of Environment and Climate Change, Interim Construction Noise Guideline (ICNG) (DECC, 2009);
- NSW Road Noise Policy (RNP) (DECCW, 2011); and
- NSW Department of Environment and Conservation, Assessing Vibration: a technical guideline (DEC, 2006).

6.3 Biodiversity

6.3.1 Existing Environment

The Project development footprint comprises a 1.25 ha area of the Project Site, in the southern and eastern sections of the broader WSSC. This area has been previously cleared and does not contain any native vegetation. The nearest treed vegetation is located on both the south western boundary and south eastern boundary of the Project Site. The vegetation adjacent to the south eastern boundary is characterised by a narrow patch of non-native vegetation plantings that act as a screen between the Project Site and Templar Road.

The vegetation adjacent to the south western boundary is remnant patch of a mix of *Eucalyptus moluccana* and *Melaleuca spp*, likely to make up the NSW Class 'Coastal Valley Grassy Woodlands'. The Project is unlikely to have an impact on surrounding vegetation, with no direct or indirect impacts to areas of native vegetation and habitat located on the adjacent property to the south-west.

A search of the NSW BioNet database for threatened species records within the last 50 years was undertaken on 4th March 2022. No threatened species are recorded within the Project development footprint. The nearest threatened species records are of the Juniper-leaved Grevillea (*Grevillea juniperina subsp. Juniperina*), Grey-headed Flying Fox (*Pteropus poliocephalus*), Cumberland Plains Land Snail (*Meridolum corneovirens*), Southern Myotis (*Myotis aelleni*), Large Bent-winged Bat (*Miniopterus orianae oceanensis*). Habitat for these species are not present within the Project development footprint, however highly mobile species may forage within the modified grasses or fly over the area as part of their generalist habitat requirements however they would not be dependent on the limited resources present.

Therefore, the Project development footprint does not support any threatened species or ecological communities and no significant habitat features have been identified. Based on the long history of vegetation clearance and disturbance, it is unlikely that the Project would result in any significant impacts on ecological values listed under the BC Act or the EPBC Act.

6.3.2 Assessment Approach

It is anticipated that there will be negligible impact to biodiversity values as a result of this proposed Project. A BDAR Waiver has been prepared for the Project and submitted to DPE on 3 May 2022. Following recent correspondence with DPE, the BDAR Waiver will be resubmitted concurrently with the request for SEARs. The BDAR Waiver is included as **Appendix F**.

6.4 Heritage

6.4.1 Existing Environment

6.4.1.1 Aboriginal Cultural Heritage

Preliminary Aboriginal heritage assessment was undertaken to identify the potential for Aboriginal heritage values and Aboriginal objects to be present across the WSSC. Assessment identified that the WSSC was once located within a landscape which was likely to have been utilised by Aboriginal people. However, significant disturbance associated with construction of the Erskine Business Park has resulted in gross disturbance to the former landscape. This disturbance is considered likely to have resulted in the complete removal of the original soil profile and any associated Aboriginal archaeological deposits.

AHIMS Database Search Results

A review of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken on 29 April 2022 to develop an understanding of any Aboriginal sites which may have been registered within or within the vicinity of the WSSC. The search was conducted utilising the parameters provided in **Table 6-4**.

Table 6-4 AHIMS Database Search Details

Parameters	Search 1
Client Service ID	678899
Datum	GDA Zone 56
Easting	294610.0 mE – 297005.0 mE
Northing	6254522.0 mN - 6256924.0 mN
Buffer	0 m
Number Sites ¹	36

A total of 36 sites were identified within or in close proximity to the WSSC, with no sites identified within the WSSC boundary. Sites within proximity to the WSSC included Artefact and Potential Archaeological Deposit (PAD) features. Two of the registered sites contain multiple site types in one location (e.g. Artefact and PADS).

The results of the full AHIMS search are summarised in **Table 6-5**, with the location of the registered sites shown in **Figure 6-1**.

Table 6-5 AHIMS Registered Site Types

Site Type	Total Number of Site types across Search parameters	Number of Sites within WSSC	
Artefact	31	0	
Artefact, Potential Archaeological Deposit (PAD)	2	0	
Potential Archaeological Deposit (PAD)	3	0	
Total	36	0	

While no sites are registered within the WSSC, several are located in close proximity including AHIMS # 45-5-2512 (150 m east of WSSC), AHIMS # 45-5-0450 (230 m north of WSSC), AHIMS # 45-5-3026 (130 m north of WSSC) and AHIMS # 45-5-2513 (220 m north east of WSSC). All of these sites are located in landscapes which have been subject to industrial development following their original recording with all sites recorded to have been subject to at least one permit under the *National Parks and Wildlife Act 1974*. The relationship of these sites to former AHIP permits will be further considered as part of the EIS.

¹ Number of sites registered following data download on 31 January 2022.



6.4.1.2 Historic Heritage

Historic Background

European exploration and subsequent settlement along the Hawkesbury-Nepean River system began as early as 1789, when Governor Philip led an expedition in search of arable land. Land grants were first made in the Mulgoa Valley from 1810 to 1816; an area in the present location of St Marys was divided into large grants, including Rev. Samuel Marsden's Mamre Estate. The WSSC is within James Erskine's 3000 acre land grant, 'Erskine Park' which was granted in 1818. Ownership of the Erskine's land was transferred to a number of individuals including Andrew Thomson who established the Lenore Estate Dairy in 1898. During the 20th Century, Thomson's estate was acquired by the Crown and split into dairy farms as part of the Closer Settlement Scheme initiative (HLA, 2004a, p. 7).

The area surrounding the WSSC functioned predominately as agricultural and pastoral lands throughout the nineteenth century, until the development of the extractive industry in the early twentieth century. A gravel quarry was established to the west of the WSSC in c.1925. By 1985 reserves of raw materials for the quarry were becoming depleted and options for rehabilitation of the quarry considered. Approval for transformation of the quarry into a landfill was granted in 1992 with rehabilitation and landfill activities beginning in 1994 (HLA, 2004a, p. 12). By the early 2000's, works had begun at transitioning the agricultural lands surrounding the former quarry into an industrial landscape. The WSSC is situated within these former agricultural lands, and historical aerials indicate that significant earthworks had taken place between 2005-2006 as part of the development of the WSSC.

The potential for archaeological remains to be present within the WSSC associated with the former agricultural or quarrying activities is considered to be low.

Statutory Heritage Register Searches

A search of all relevant historic heritage databases was undertaken with the following results:

Commonwealth Heritage List

The Commonwealth Heritage List includes natural, Indigenous and historical heritage places owned or controlled by the Australian Government. Items on the list have satisfied the Minister as having one or more Commonwealth Heritage values. There are no Commonwealth Heritage listed places within 4 km of the WSSC.

National Heritage List

The Australian National Heritage List contains natural, historic, and Indigenous places deemed to be of outstanding heritage significance to Australia. Before a site is placed on the list a nominated place is assessed against nine criteria by the Australia Heritage Council. There are no National Heritage listed places within 4 km of the WSSC.

State Heritage Register

A search of the NSW State Heritage Register (SHR) was conducted on 4 May 2022. No historic heritage listings have been identified for the WSSC or its immediate surrounds, with the nearest listing, *Mamre* (SHR 00264), being found in the nearby suburb of St Marys approximately 3.8 kilometres north-west of the WSSC.

Section 170 Heritage Registers

Section 170 of the *Heritage Act* 1977 requires all NSW state agencies to identify, conserve and manage the heritage assets owned, managed and occupied by that agency. In order to facilitate this, Section 170 heritage registers were established for all NSW government agencies. These registers are held and maintained by each state agency and updated as assets are acquired, altered, or decommissioned.

A search of the relevant Section 170 registers was undertaken on 4 May 2022.

No Section 170 heritage places are located within or in close proximity to the WSSC.

Environmental Planning Instruments

The WSSC is located within the Penrith LGA and is subject to the provisions of the Industry and Employment SEPP. Searches of the Penrith LEP and Industry and Employment SEPP have been undertaken to identify local heritage items in proximity to the WSSC.

A search of the Penrith LEP was undertaken on 4 May 2022. The results of the search found that there are no listed heritage items within the WSSC. The closest local heritage item under the Penrith LEP, *Leeholme Horse Stud Rotunda*, Orchard Hills (Item 232), is located approximately 2.2 km west of the WSSC.

A search of the Industry and Employment SEPP was undertaken on 18 May 2022. The results of the search found that there are no listed heritage items within the WSSC. The closest local heritage item under the Industry and Employment SEPP, *Southridge*, Eastern Creek (Item 11), is located approximately 4.5 km east of the WSSC.

Non-Statutory Considerations

Register of the National Estate

The Register of the National Estate (RNE) is a non-statutory archive of natural, historic and Indigenous places and incorporates over 13,000 places. Originally compiled between 1976 and 2003 by the Australian Heritage Commission, the register is now maintained by the Australian Heritage Council.

Following amendments to the Australian Heritage Council Act 2003, the RNE was frozen on 19 February 2007, which means that no new places can be added, or removed. Since February 2012 the RNE has been maintained as a non-statutory listing.

A search of the Australian Heritage Database was undertaken on 4 May 2022. This search identified no RNE listed places within or in close proximity to the WSSC.

6.4.2 Assessment Approach

Preliminary assessment has identified that the WSSC is located within a heavily modified landscape which has been subject to substantial earthworks associated with the construction of the current Erskine Business Park. A search of the AHIMS database has indicated that no Aboriginal sites are registered within the WSSC with the potential for unregistered Aboriginal objects to be present within the WSSC considered to be low. No historic heritage items are registered within the WSSC with the closest registered heritage item located 2.2 km from the WSSC.

While a significant level of ground disturbance has occurred within the WSSC which limits the Aboriginal heritage potential of the WSSC, it is understood that an Aboriginal Cultural Heritage Assessment Report (ACHAR) would be required as a component of the EIS.

The ACHAR would include:

- Comprehensive consultation with Aboriginal stakeholders in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010).
 Comprehensive consultation is the primary mechanism for identifying the cultural significance of the locality; and
- Cultural heritage surveys of the WSSC to ground truth existing Aboriginal sites and identified areas of archaeological sensitivity as well as identify areas of cultural significance in conjunction with Aboriginal stakeholders.

While no registered historic heritage items are located within the WSSC, it is likely that a historic heritage assessment would be conditioned within the SEARs to support the EIS. It is proposed that historic heritage due diligence will be undertaken to identify the potential for unlisted or previously unidentified heritage values to be associated with the WSSC.

6.5 Access – Traffic and Transport

6.5.1 Existing Environment

The WSSC is located approximately 5.2 km west of the M7 Motorway and 2.4 km south of the M4 Motorway. Access to the WSSC is provided from the east via Templar Road, which travels north-south and adjoins onto Lenore Drive approximately 270 m north of the WSSC. Lenore Drive intersects with Erskine Park Road approximately 1.1 km to the west of the intersection with Templar Road, and the M7 Motorway 5.3 km to the east of the intersection with Templar Road. Local roads are displayed in **Figure 2-1**.

The WSSC contains an existing car parking area that currently services the CPL8 facility. Car parking requirements for the combined operations of CPL8 and MCL7 at the WSSC will be subject to further investigation as part of the EIS.

The existing traffic fleet at the WSSC consists of B Double, Tri-axle, and Rigid vehicles. Paint feed for the existing CPL8 facility is delivered to the WSSC from BlueScope's Springhill Works, adjacent to the Port Kembla Steelworks (PKSW), NSW, which is located approximately 100 km south of the WSSC by road. Deliveries along this route currently utilise B-double approved roads including the Hume Highway, Picton Road, Westlink M7, Western Motorway M4, Erskine Park Road, and Mamre Road.

Current traffic movements at the WSSC comprise an average of 144 truck movements per week including:

- 58 inbound (Paint feed from Springhill to WSSC) truck movements per week (~40 t per truck);
- 86 outbound (WSSC to Customer) truck movements per week (~24.5 t per truck); and
- Seven (7) backload (WSSC to Springhill) truck movements per week (~15.6 t per truck), with the same trucks used for bringing up the paint feed.

Proposed traffic movements at the WSSC with the inclusion of MCL7 have been outlined in **Section 3.2.6**. Compared to existing truck movements at the WSSC, the placement of MCL7 on site will result in a net increase of 49 inbound feed truck movements and 103 outbound truck movements per week.

All CRFH feed for MCL7 will be supplied from BlueScope's Springhill Works via a shuttle service operating between the two plants. A purpose built trailer is being proposed, which will optimise the logistics payload to between 36 to 56 t per truck with the most likely payload being approximately 43.5 t per truck. Feed for MCL7 will consume cold rolling capacity that is primarily used for Export, which will result in a reduction in the volumes being transferred from Springhill via low loader vehicles to the Products Berth.

6.5.2 Assessment Approach

Access to the WSSC, including traffic and transport, are key considerations during both the construction and operational phases of the Project. A Traffic Impact Assessment (TIA) will be undertaken for the EIS, which will aim to identify potential traffic, transport and access impacts of the Project, and include a route assessment for truck movements between the Springhill Works and the WSSC.

The assessment will incorporate the following components:

- reviewing existing access arrangements;
- estimating the volume and distribution of construction and operational traffic;

- identifying appropriate mitigation measures; and
- reviewing site access and parking arrangements.

The assessment will be undertaken in accordance with the following guidelines and resources:

- Guide to Traffic Generating Developments (RTA, 2002);
- Austroads *Guide to Road Design;* and
- Austroads Guide to Traffic Management.

6.6 Social

This section provides the first phase Social Impact Assessment (SIA) undertaken for the Project, in line with the DPE *Social Impact Assessment Guideline: For State Significant Projects* (the Guideline) (Department of Planning, Industry and Environment [DPIE], 2021b) and DPE's *Technical Supplement: Social Impact Assessment Guideline for State Significant Projects* (Technical Supplement) (DPIE, 2021e).

The first phase SIA involves scoping and preliminary assessment, identifies the level of assessment to be applied, and sets further parameters for the second phase SIA (the assessment report to be appended to the EIS) (DPIE, 2021b, p. 12)

Accordingly, the first phase SIA includes:

- defining the Project's Social Locality;
- describing the profile of the community in a preliminary social baseline, outlining the potential social impacts; and
- outlining the approach that will be undertaken to complete the second phase SIA during the EIS phase.

6.6.1 Existing Environment

6.6.1.1 Social Locality

One of the first steps in a SIA is the scoping process, which helps to define the social area of influence, or Sociality Locality. Determining the Social Locality for the Project involves understanding the nature of the Project, the characteristics of the surrounding communities, and how potential positive and/or negative impacts will be experienced by different community members and groups.

In determining the Social Locality, the following were taken into consideration:

- the Project Description, including the nature of the coating process, and the associated plant throughput;
- the location and layout of MCL7, and any ancillary infrastructure, relevant to the WSSC and surrounding sensitive land uses; and
- construction and operation phase activities, such as:
 - Workforce requirements, including skills required, accommodation arrangements and daily transportation to and from the site;
 - Goods and services required by the Project; and
 - Haulage routes to and from the WSSC.

When considering these aspects, it was determined that the Project's Social Locality should include the WSSC, the surrounding area wherein noise, visual, air quality and other amenity impacts may occur, as well as the communities that may provide workers or goods and services to the Project.

The WSSC is located within the Erskine Business Park (also known as the Erskine Park Industrial Estate and Westpark Industrial Estate), an industrial precinct located wholly within the Penrith LGA, adjacent to border of the City of Blacktown and City of Fairfield LGAs. The WSSC is accessed from the east via Lenore Drive and Old Wallgrove Road, which connects the Business Park to the M7 Motorway interchange at Eastern Creek. The Business Park is also connected to the M4 Motorway to the north via Erskine Park Road, and to the north and south via Mamre Road.

The Project's Social Locality, as defined for the purposes of the SIA, is comprised of the following three components:

- the WSSC and immediate surrounding areas, located within the Australian Bureau of Statistics (ABS) Erskine Park and St Clair Statistical Area Level 2 (SA2) containing the Project and nearby residencies. SA1 and SA2 data has been used to identify key baseline indicators for the Social Locality, where applicable. Additionally, LGA level data for the Penrith, Blacktown, and Fairfield LGAs, and the Greater Sydney Greater Capital City Statistical Area (GCCSA) was used to provide an understanding of the broader and comparative social context within which the Project is located;
- the transportation and haulage routes, comprising vehicular routes to and from the site which will be used during construction and operations, including Mamre Road, Erskine Park Road, and Lenore Drive; and
- the surrounding communities in the Penrith, Blacktown, and Fairfield LGAs and the wider Sydney
 region wherein goods and services to support the construction and operation phases of the
 Project are likely to be sourced.

The WSSC and immediate surrounding areas (comprising an SA1, SA2s and LGAs), and transportation and haulage routes are depicted in **Figure 6-2**.



6.6.1.2 Community Profile

The community profile presented in this section will inform the social baseline in the second phase SIA (as part of the EIS), and draws on the latest available ABS data (the 2016 census at the time of writing).

Table 6-6 outlines the primary ABS datasets used to provide key demographic data across the Project's Social Locality. For the purposes of the first phase SIA only 2016 ABS datasets (i.e. latest available) were considered, however, in the second phase SIA, relevant 2011 ABS data (or 2021 ABS data, dependent upon release date) will also be used for the purposes of trend analysis.

Location	2016 ABS Data Reference (Census)		
Penrith LGA	16350 (LGA)		
Erskine Park SA2	124051469 (SA2)		
St Clair SA2	124051470 (SA2)		
Kemps Creek SA1	1151808 (SA1)		
Blacktown LGA	10750 (LGA)		
Fairfield LGA	12850 (LGA)		
Greater Sydney	1GSYD (GCCSA)		

Table 6-6Summary of Relevant ABS Datasets

In addition to the above listed ABS datasets, the second phase SIA social baseline will be informed by a desktop review of sources including from public health advisory bodies, principally NSW Health and local hospitals (i.e. regarding physical and mental health issues prevalent in the local community), and educational institutions, principally the NSW Department of Education and local schools. Information relating to the economic profile of the Project is also provided by ABS 2016 Census data, while information on developmental priorities and challenges in the region will be provided by local and state government planning documents.

Table 6-7 draws on the ABS datasets listed in **Table 6-6** to provide a demographic overview of the Project's Social Locality. These Statistical Areas are the primary source providing details of the potentially impacted community's defining characteristics, and are used to provide a preliminary understanding of the demography and vulnerable groups within the Project's immediate Social Locality.

Table 6-7 also includes the ABS' Socio-Economic Indexes for Areas (SEIFA)² to provide an indication of comparative socio-economic advantage and disadvantage.

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² Socio-Economic Indexes for Areas (SEIFA) is a product developed by the ABS that ranks areas in Australia according to relative socio-economic advantage and disadvantage. The indexes are based on information from the five-yearly Census, available at: <u>https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/2033.0.55.001Main+Features12016?OpenDocument</u>.

	ABS Statistical Area	Penrith LGA (16350)	Erskine Park SA2 (124051469)	St Clair SA2 (124051470)	Kemps Creek SA1 (1151808)	Blacktown LGA (10750)	Fairfield LGA (12850)	Greater Sydney 1GSYD (GCCSA)
ition	Population	201,600**	6,436	19,897	305	348,050**	205,700**	4,823,991
	Population Expected ∆ to 2041	369,250	-	-	-	612,150**	264,600**	-
	Median age	34	34	34	60	33	36	36
Popula	Population under 14 / over 65	21.1% / 11.7%	19.3% / 6.7%	20.8% / 9.0%	8.9% / 43.8%	22.8 % / 10.3%	19.1% / 13.8%	18.7% / 13.9%
	Indigenous population	3.9%	2.2%	3.0%	0.0%	2.8%	0.7%	1.5%
-	Households where a non- English language is spoken	20.7%	28.0%	27.6%	58.8%	45.9%	75.5%	38.2%
Education	Educational attainment Year 12 or equiv.	15.6%	17.7%	17.6%	19.5%	18.0%	23.3%	17.3%
	Educational attainment TAFE certificates and diplomas or equiv.	27.9%	29.9%	28.6%	10.4%	22.4%	18.0%	21.4%
	Educational attainment <i>B. degree or equiv.</i>	13.4%	13.6%	12.2%	3.9%	22.0%	11.3%	28.3%
	Household Income median weekly	\$1,658	\$2,104	\$1,859	\$1,562	\$1,711	\$1,222	\$1,750
ing	Unemployment rate	5.7%	4.8%	5.1%	8.2%	7.3%	10.5%	6.0%
Income & hous	Housing tenure Owned / mortgaged / rented	26.0% / 40.7% / 30.2%	28.2% / 52.9% / 16.4%	29.1% / 50.2% / 18.2%	65% / 8.3% / 26.7%	22.5% / 41.9% / 32.2%	32.1% / 28.8% / 34.9%	29.1% / 33.2% / 34.1%
	Dwelling count Number unoccupied (%)	3,972 (5.9%)	55 (2.8%)	234 (3.7%)	8 (11.6%)	5,099 (4.8%)	3,163 (5.2%)	136,055 (7.7%)
	***SEIFA Percentile in NSW	73	76	61	38	62	4	-

Table 6-7 Key Indicators for all ABS Datasets* across the Project's Social Locality

* All datasets are from the 2016 Census (ABS, 2017) unless otherwise noted. ** Population Projections data supplied by NSW Department for Planning, Industry and Environment (DPIE, 2020) *** SEIFA data provided in (ABS, 2018)

Table 6-8 outlines the key industries and areas of employment for two SA2s (Erskine Park and St Clair), the SA1 (Kemps Creek) and three LGAs (Penrith, Blacktown, and Fairfield LGAs) included in the Project's Social Locality.

Table 6-8	Key Industries for Select ABS Statistical Areas (2016 Census
Data)	

Location	Key Occupations and Industries		
Penrith LGA 16350 (LGA)	 There were 100,604 people who reported being in the labour force in the week before 2016 Census night in the Penrith LGA. Of these 63.9% were employed full time, 25.6% were employed part-time and 5.7% were unemployed. The most common occupations in the Penrith LGA included Clerical and Administrative Workers (17.8%), Professionals (14.8%), Technicians and Trades Workers (14.8%), Machinery Operators and Drivers (10.8%), and Community and Personal Service Workers (10.5%). Of the employed people in the Penrith LGA, (3.4%) worked in Hospitals (except Psychiatric Hospitals). Other major industries of employment included Supermarket and Grocery Stores (2.7%), Road Freight Transport (2.7%), Takeaway Food Services (2.3%) and Primary Education (2.0%). 		
Erskine Park SA2 124051469 (SA2)	 There were 3,845 people who reported being in the labour force in the week before 2016 Census night in Erskine Park (SA2). Of these 66.0% were employed full time, 25.6% were employed part-time and 4.8% were unemployed. The most common occupations in Erskine Park (SA2) included Clerical and Administrative Workers (20.0%), Technicians and Trades Workers (15.9%), Professionals (13.6%), Managers (10.2%), and Machinery Operators and Drivers (10.1%). Of the employed people in Erskine Park (SA2), 3.5% worked in Road Freight Transport. Other major industries of employment included Hospitals (except Psychiatric Hospitals) (3.2%), Takeaway Food Services (3.1%), Supermarket and Grocery Stores (3.0%) and Banking (2.2%). 		
St Clair SA2 124051470 (SA2)	 There were 10,796 people who reported being in the labour force in the week before 2016 Census night in St Clair (SA2). Of these 65.5% were employed full time, 24.9% were employed part-time and 5.1% were unemployed. The most common occupations in St Clair (SA2) included Clerical and Administrative Workers (19.0%), Technicians and Trades Workers (15.3%), Machinery Operators and Drivers (12.8%), Professionals (12.5%), and Sales Workers (10.1%). Of the employed people in St Clair (SA2), 3.5% worked in Road Freight Transport. Other major industries of employment included Supermarket and Grocery Stores (3.3%), Hospitals (except Psychiatric Hospitals) (2.8%), Takeaway Food Services (2.3%) and Banking (2.1%). 		
Kemps Creek SA1 1151808 (SA1)	 There were 110 people who reported being in the labour force in the week before Census night in the SA1. Of these 58.2% were employed full time, 26.4% were employed part-time and 8.2% were unemployed. The most common occupations in the SA1 included Managers (21.4%), Professionals (17.3%), Technicians and Trades Workers (15.3%), Clerical and Administrative Workers (11.2%), and Sales Workers (11.2%). Of the employed people in the SA1, 11.1% worked in Vegetable Growing (Outdoors). Other major industries of employment included Site Preparation Services (11.1%), Primary Education (9.5%), Toy and Game Retailing (7.9%) and Dairy Cattle Farming (4.8%). 		

Location	Key Occupations and Industries			
Blacktown LGA 10750 (LGA)	There were 163,375 people who reported being in the labour force in the week before 2016 Census night in the Blacktown LGA. Of these 62.7% were employed full time, 25.3% were employed part-time and 7.3% were unemployed.			
	The most common occupations in the Blacktown LGA included Professionals (19.0%), Clerical and Administrative Workers (16.4%), Technicians and Trades Workers (12.7%), Machinery Operators and Drivers (11.0%), and Labourers (10.2%).			
	Of the employed people in the Blacktown LGA, 3.8% worked in Hospitals (except Psychiatric Hospitals). Other major industries of employment included Supermarket and Grocery Stores (3.0%), Banking (2.5%), Aged Care Residential Services (2.3%) and Takeaway Food Services (2.2%).			
Fairfield LGA 12850 (LGA)	There were 80,326 people who reported being in the labour force in the week before 2016 Census night in the Fairfield LGA the Fairfield LGA. Of these 56.3% were employed full time, 28.2% were employed part-time and 10.5% were unemployed.			
	The most common occupations in the Fairfield LGA included Technicians and Trades Workers (15.0%), Labourers (14.8%), Clerical and Administrative Workers (14.0%), Professionals (13.8%), and Machinery Operators and Drivers (12.2%).			
	 Of the employed people in the Fairfield LGA, 2.2% worked in Supermarket and Grocery Stores. Other major industries of employment included Hospitals (except Psychiatric Hospitals) (2.2%), Cafes and Restaurants (2.1%), Banking (2.0%) and Road Freight Transport (2.0%). 			

6.6.1.3 Social Infrastructure Overview

The Project Social Locality is characterised by densely populated residential developments to the north in the suburbs of Erskine Park and St Clair, and considerably less densely populated mixed-use suburb of Kemps Creek to the south, separated by the Erskine Business Park.

St Clair and Erskine Park

St Clair, the larger of the suburbs, features three retail precincts (zoned Enterprise) with a variety of grocery stores, speciality goods stores and eateries, several educational facilities including several childcare and primary school facilities, and a high school (St Clair High School).

Erskine Park features one retail precinct, several childcare centres, a primary school, and a high school (Erskine Park High School). Across St Clair and Erskine Park, local sporting and recreational facilities include the St Clair Leisure Centre, the Peppertree Sports Complex, the Erskine Park Netball Courts, and several neighbourhood parks and outdoor greenspaces. Local community organisations include the Autumnleaf Community Centre, Cook Parade Neighbourhood Centre, and the Erskine Park Community Centre and Hall.

Local medical and dental services include the Provincial Medical Centre, St Clair Medical Practice, St Clair Community Health Facility, St Clair Mediclinic and Dental Surgery, Your Healthy Smile Dentists, the Erskine Park Family Clinic, and Erskine Park Dental. Public hospital facilities servicing the wider area include Mount Druitt Hospital, Fairfield Hospital, and Nepean Hospital (Penrith). St Mary's provides the closest police and fire emergency services, with the St Mary's Police Station and Fire and Rescue NSW, located approximately 6 km north of the WSSC. The Erskine Park Rural Fire Brigade is also located approximately 3 km northwest of the WSSC.

The Erskine Business Park

The Erskine Business Park industrial precinct was gazetted for industrial purposes under the former *State Environmental Planning Policy (Western Sydney Employment Area) 2009.* Most development has taken place subsequent to 2009 and the area has grown to be an important regional logistics and distribution centre with strategic links to the M4 and M7 Motorways. The precinct covers approximately 721 ha, of which approximately 105 ha is vacant (as of 2021). The 99 businesses in residence employed 5,805 people (as of 2016). Of these jobs, 67% were industrial (including transport, warehousing, and manufacturing), 18% were in services, 8% were knowledge intensive, and 7% were in health and education (Penrith City Council, 2021)

The Bayswater to Sydney West and Sydney West to Bannaby 330 Kv transmission line corridor bounds the Erskine Business Park to the north. Ropes Creek and Mamre Rd bound the park to the east and west, respectively, while Mamre Road bounds the Park to the west. To the south, the Warragamba Pipeline corridor bounds the established section of the Park. Further greenfield developments within the Park zoning are occurring to the south and east in Kemps Creek, extending the industrial precinct into the more sparsely populated areas of Kemps Creek.

Business Park residents include Cleanaway operating the Erskine Park Landfill, several warehousing and distribution centres (Woolworths, Coles, Linfox, Mainfreight, DHL, FedEx, Amazon), and datacentres including the Digital Realty Datacentre and the proposed Lockwood Road Datacentre.

Kemps Creek

The Kemps Creek locality resembles an urban and industrial fringe of Greater Western Sydney as development encroaches on sparsely populated areas under mixed commercial and residential uses.

Catholic Healthcare operate the Emmaus Retirement Village, Emmaus Catholic College, and the Trinity Primary School approximately 750 m to 1.5 km south of the WSSC. The Mamre Anglican School and a small number of private residencies are located on acreage properties are located adjacent to these facilities. The area surrounding these facilities and residencies is predominantly rural with nursery (Greener Growth Nurseries) and other farming businesses occupying large lots of mostly undeveloped or agricultural land.

Large portions of Kemps Creek to the north of Elizabeth Drive are situated within the boundaries of the Western Sydney Employment Area. These areas have been zoned for industrial land uses under the Industry and Employment SEPP to allow for the development of a future employment precinct (Penrith City Council, 2021).

6.6.2 Potential Social Impacts

The scoping of potential social impacts was initially facilitated through consideration of the updated SIA Scoping Tool (DPIE, 2021f) that complements the SIA Guideline (DPIE, 2021b). The scoping tool identifies the social impacts that are considered likely to occur, and the corresponding level of assessment for each social impact. Use of the updated SIA Scoping Tool allows for the level of assessment for the potential social impacts to be identified, which in this case was determined to be 'detailed assessment'.

The social impact assessment approach utilised follows DPE's Social Impact Assessment Technical Supplement guidance on evaluating the likely significance of both potential positive and negative social impacts (DPIE, 2021e). The first phase SIA provides a preliminary desktop assessment of these potential impacts while the second phase SIA, that will be incorporated into the EIS, develops this preliminary assessment into a full assessment report. The full assessment report provides a detailed analysis of the potential impacts and incorporates primary data informed by key stakeholder feedback.

An outline of the methodology the second phase SIA will follow is provided below. The second phase SIA will elaborate potential cumulative impacts in view of recent and proposed industrial and other large-scale projects in the Project's Social Locality.

As this is a first phase SIA, this impact assessment is preliminary in nature and makes assumptions based on the desktop assessment and prior industrial development SIA experience. The identified potential impacts listed in **Table 6-9** will be ground-truthed, supplemented by key stakeholder feedback, and reviewed against any changes associated with further design development subsequent to issuing the SEARs. Further development of this assessment in the second phase SIA will include application of DPE's social impact significance matrix, and an assessment of both pre and post management and mitigation scenarios.

Impact activity	Description of Impact	Impact Categories	Project Phase
Construction Amenity (including Noise, Vibration, Dust, etc.)	Potential negative impacts from earthworks and/or other heavy machinery used during construction activities, dust from ground disturbance, etc.	Way of Life, Health and Wellbeing	Construction
Construction Traffic	Potential negative impacts from increased traffic due to construction related activities, including the transportation of goods and workers to site.	Way of Life, Health and Wellbeing	Construction
Construction and Operation Employment	Potential benefits from increased employment within the local community stimulated by the construction and operation phases of the Project.	Way of Life, Livelihoods	Construction
Construction Procurement	Potential benefits for local suppliers and supporting industries associated with procurement for the construction phase of the Project.	Way of Life, Livelihoods	Construction
Operation Amenity (including Noise, Vibration, Visual, Air Quality)	Potential negative impacts (including perceived negative impacts) on surrounding sensitive receptors due to increased operational noise and vibration levels, changed visual amenity, and/or lower air quality through increased emissions.	Way of Life, Health and Wellbeing	Operation
Operational Traffic	Potential impacts from increased traffic due to operation related activities, including the transportation of goods to and from the site, and increased employee numbers.	Way of Life, Health and Wellbeing	Operation
Operational Human Health and Safety (Hazardous Substances)	Potential negative impacts from the transportation, storage, and use of hazardous substances on site.	Way of Life, Health and Wellbeing	Operation
Closure and Decommissioning Employment	Potential impacts from loss of employment associated with Project closure and decommissioning.	Way of Life, Livelihoods	Closure and Decommissioning
Closure and Decommissioning Site Remediation	Potential human health and safety impacts associated with the remediation of the WSSC.	Way of Life, Health and Wellbeing	Closure and Decommissioning

Table 6-9 Preliminary Social Impact Assessment

6.6.3 Assessment Approach

This section outlines the plan for developing the second phase SIA, in accordance with the requirements of the Social Impact Assessment Guideline (DPIE, 2021b) and Technical Supplement (DPIE, 2021e). Accordingly, the second phase SIA will be structured according to the following sections:

1. Introduction, Project Description, Regulatory Context

This section will provide a detailed overview of the Project locality, components, stages, and history. It will also provide a detailed review of the legislative and regulatory framework applicable to the SIA, taking into account relevant company policies.

2. Social Locality and Stakeholder Identification

This section will elaborate on the preliminary outline of the Project's Social Locality. The update will incorporate regulator and client feedback on the preliminary identification and provide an updated stakeholder list as the SIA moves into the second phase and more information becomes available.

3. Methodology

The impact assessment methodology to be applied to the second phase SIA follows DPIE's Social Impact Significance matrix (DPIE, 2021e, pp. 12-13), as depicted in **Table 6-10**. In this matrix, the likelihood level refers to the probability of a social impact's occurrence as a result of the Project while the magnitude is considered in terms of the following elements:

- Extent: Who specifically is expected to be affected (directly, indirectly, and/or cumulatively), including any potential vulnerable people? Which location(s) and people are affected? (e.g. near neighbours, local, regional).
- Duration: When is the social impact expected to occur? Will it be time-limited (e.g. over particular Project phases) or permanent?
- Severity: What is the likely scale or degree of change? (e.g. mild, moderate, severe).
- Intensity: How sensitive/vulnerable (or how adaptable/resilient) are affected people to the impact, or (for positive impacts) how important is it to them? This might depend on the value they attach to the matter; whether it is rare/unique or replaceable; the extent to which it is tied to their identity; and their capacity to cope with or adapt to change.
- Level of Concern/Interest: How concerned/interested are people? Sometimes, concerns may be disproportionate to findings from technical assessments of likelihood, duration and/or severity. Concern itself can lead to negative impacts, while interest can lead to expectations of positive impacts.

The characteristics of the magnitude of impact combine with their likelihood of occurrence to yield a rating of social impact significance, as indicated in **Table 6-10**. The social impact significance matrix depicted in **Table 6-10** will be applied to yield the initial evaluation of social impacts that are likely to be experienced by different groups within the Project's Social Locality.

		Magnitude level				
		1 Minimal	2 Minor	3 Moderate	4 Major	5 Transformational
ikelihood level	A Almost certain	Medium	Medium	High	Very High	Very High
	B Likely	Low	Medium	High	High	Very High
	C Possible	Low	Medium	Medium	High	High
	D Unlikely	Low	Low	Medium	Medium	High
	E Very unlikely	Low	Low	Low	Medium	Medium
-	F Positive	P1	P2	P3	P4	P5

Table 6-10 Adapted Social Impact Significance Matrix

4. Stakeholder Engagement for SIA

This section will provide a summary of stakeholder engagement relevant to the SIA. Key stakeholder interviews specific to the SIA will be conducted as part of wider stakeholder engagement activities. SIA tailored questions and discussion topics will guide semi-structured interviews with key informants in a manner designed to elicit honest responses underpinned by free, prior informed consent of the participants. The broad categories of stakeholders to be targeted for the SIA include: host landowners, neighbouring landowners, Traditional Owner groups, local governments, local businesses and representative groups, social and community service providers, and the wider community. More extensive details of stakeholder engagement activities will be included in appendices, where relevant.

The draft BlueScope Stakeholder Engagement Strategy provides an overview of the communication and engagement activities, and timing including key engagement during 2022. Stakeholder inputs required for the SIA will be coordinated within the broader program of stakeholder engagement outlined in the draft Plan.

5. Social Baseline

This section will update and expand on the community profile outlined above. The preliminary desktop assessment will be supplemented and ground-truthed with data obtained during fieldwork, including from stakeholder engagement activities outlined above.

6. Social Impact Assessment and Management

This section addresses potential social impacts providing an impact assessment informed by stakeholder engagement. This section also provides a summary of all of the impact assessment mitigations which have applied to the Project through all phases, including earlier phases of planning and development. Two ratings will be provided in the impact assessment table covering pre- and post-mitigation/management levels of impact significance, including residual impacts.

7. Monitoring and Management Framework

This section will provide an overview of the recommended monitoring and social impact management measures that are to be put in place covering both the construction and operation phases of the Project. For the post-mitigation impact significant levels to be achieved, the social impact mitigations outlined in this section will need to be implemented according to the plan outlined in this section.

8. References

List of all documents and other resources cited in the SIA.

9. Appendices

Appendices will include community profiles and other supporting information such as summaries of stakeholder engagement and primary research.

6.7 Hazards and Risks

This section provides a preliminary assessment of environmental hazards and risks that could arise during the operation of the Project. Specifically, it considers hazards and risks associated with hazardous materials, airspace, contamination, and bushfire.

6.7.1 Preliminary Hazard Analysis

6.7.1.1 Existing Environment

The WSSC is zoned as *IN1 General Industrial* pursuant to the provisions of the Industry and Employment SEPP, which prohibits 'hazardous' and 'offensive' industries under the Resilience and Hazards SEPP.

Clause 3.2 of the Resilience and Hazards SEPP defines 'potentially hazardous industry' and 'potentially offensive industry' as follows:

- potentially hazardous industry means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would pose a significant risk in relation to the locality—
 - (a) to human health, life or property, or
 - (b) to the biophysical environment,

and includes a hazardous industry and a hazardous storage establishment.

potentially offensive industry means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

It is noted that as of 1 March 2022, the provisions of the former *State Environmental Planning Policy No. 33* (SEPP 33) were transferred to Chapter 3 of the Resilience and Hazards SEPP. Chapter 3 of the Resilience and Hazards SEPP applies to all developments that are considered to be potentially hazardous industry or potentially offensive industry, and aims to ensure that industrial proposals only proceed if they are suitably located and are able to demonstrate that they can be built and operated with an appropriate level of safety. A preliminary assessment was undertaken to determine whether the Project could be classified as potentially hazardous or potentially offensive. The results of these assessments are summarised below.

6.7.1.2 Assessment of Potentially Offensive Industry and Potentially Hazardous Industry

Potentially Offensive Industry

An Offensive Industry Development Memorandum (OIDM) was prepared by ERM to determine the potential for the Project to be classified as an offensive or potentially offensive industry under the Resilience and Hazards SEPP, and the permissibility of the Project if deemed as potentially offensive industry. The OIDM is included as **Appendix D** and is summarised within this section.

Before a proposal can be identified as offensive industry, it must first be identified as being potentially offensive industry and subject to the assessment and exhibition requirements of the Resilience and Hazards SEPP. This assessment is required to demonstrate that the offence can be controlled to a level which is not significant.
The Project would be defined as a "Scheduled Activity" under Schedule 1, Clause 26 of the *Protection of the Environment Operations Act 1997* (POEO Act) as the proposed MCL would be developed with capacity to process more than 10,000 tonnes of metal per year. An EPL is required for premises at which scheduled activities are carried on, and the Project would therefore be considered as a 'potentially offensive industry' and require an EPL. However, the Applying SEPP 33 Guidelines (DoP, 2011) also state that if an EPL can be obtained for a development, and the requirements of the EPL can be met, the development is not considered to be an 'offensive industry' and would be permissible under the Resilience and Hazards SEPP.

The scope of matters likely to be regulated by an EPL for a development of this nature would usually include air quality and odour, and noise, among other environmental components that may emit a polluting discharge. An EPL of this nature would be consistent with the EPL currently in place for the existing CPL8 operations within the WSSC. To understand the potential for Project-related air and noise to emit a polluting discharge in line with the definition of offensive and/or potentially offensive industry, qualitative assessments for air quality and noise were undertaken in the OIDM with the outcomes summarised below.

Air Quality

A qualitative air quality assessment has been prepared to understand the potential air quality constraints in relation to offensive industry at MCL7, and is included as Attachment A of the OIDM (**Appendix D**). The qualitative air quality assessment was prepared with the aims of:

- contextualising the potential risk of the Project to constitute 'offensive industry' with regard to
 routine air emissions and corresponding ambient air quality considerations; and
- considering air emission profiles for the WSSC and surrounding industry, as well as changes in the profile associated with the introduction of MCL7 at the WSSC.

Based on the review, it is not considered that the Project would be consistent with the definition of 'offensive industry'. The currently authorised emission sources from WSSC have a similar air emission profile to those of the proposed Project, and the impact assessment and operational monitoring processes will be used to mitigate the potential impact of air emissions. As such, the Project is likely to be classified as 'potentially offensive industry' pursuant to the provisions of the Resilience and Hazards SEPP and therefore permissible with consent under the Industry and Employment SEPP.

Noise

A qualitative noise and vibration assessment has been prepared to understand the potential noise and vibration constraints in relation to offensive industry at MCL7, and is included as Attachment B of the OIDM (**Appendix D**). Based on the outcomes of this assessment, the Project is not considered an offensive industry in terms of noise pollution at residential receptors, and compliance is predicted for the proposed operations of MCL7. The Project will not have a significant adverse impact in the locality, or on the existing or likely future development on other land in the locality, and as such is not expected to result in a significant level of offence.

Summary

Based on the results of the qualitative air quality and noise assessments, it is expected that the Project would not be deemed as an 'offensive' industrial development, but is likely to be deemed as a 'potentially offensive' development as defined in the Resilience and Hazards SEPP. The Project could therefore be deemed as 'potentially hazardous and/or offensive industry' resulting in the permissibility of the Project within the *IN1 General Industrial* zoning. This will be subject to further assessment within the EIS.

Potentially Hazardous Industry

Arriscar Pty Ltd (Arriscar) was commissioned by ERM to undertake a Hazard Assessment for Project in accordance with the Resilience and Hazards SEPP (formerly SEPP 33). Given that the Project will store and process dangerous goods, the assessment aimed to evaluate the permissibility of the Project, and determine whether the Project is likely to classified as a 'potentially hazardous' or 'hazardous' industry. The Hazard Assessment is attached as **Appendix E** and is summarised within this section.

An assessment of the Project under Chapter 3 of the Resilience and Hazards SEPP was undertaken to evaluate the permissibility of the Project, and to determine the extent of offsite impacts.

The scope of the study covered the following:

- proposed MCL7 at Erskine Park;
- existing CPL8 at Erskine Park; and
- associated dangerous goods storage.

A hazard identification workshop was held on 16 February 2022 and attended by representatives from ERM, BlueScope, and Arriscar. A list of potentially hazardous incidents was developed from the minutes of a hazard identification workshop, and included events with the potential to cause a fire, explosion and/or release of toxic gas or vapour.

The following recommendations were made following the hazard identification workshop:

- consider fixed CO monitoring and alarm near furnace area;
- ensure H2 line is fully welded as far as possible with no fittings;
- locate the H2/N2 blending station outside the MCL building and bring in only the lower pressure diluted hydrogen;
- consider providing pre-heat to H2/N2 mixture to promote excess H2 combustion in the vent before stack emission;
- consider excluding passivation dryer vent emission VOC monitoring during EPA licencing process;
- ensure that a tank level gauge is available near the truck unloading point that is readily visible to the driver;
- review chemical spill emergency response plant to determine if nitric acid spills need separate procedures; and
- review code requirements, considering the site constraints on preventing water in process areas.

A preliminary consequence analysis was also undertaken as a component of the assessment. Based on the findings of the preliminary consequence analysis, the hazards identified are expected to be mainly contained within the boundaries of the WSSC. The incidents where offsite effects may occur, such as a hydrogen explosion or stack emissions from process failures, are likely to be contained within the Erskine Park industrial precinct, and injury and irritation consequences from emissions are unlikely to reach sensitive land uses which are more than 500 m away. Demonstrating compliance with the risk criteria in Hazardous Industry Planning Advisory Paper (HIPAP) No.4 1 can provide assurance that the proposal would be 'potentially hazardous' rather than 'hazardous'.

The preliminary review concluded that the Project is likely to be a 'potentially hazardous' rather than a 'hazardous' industry. A PHA will need to be undertaken to accompany the EIS to demonstrate that the land use safety risk criteria can be met.

6.7.1.3 Assessment Approach

A PHA will be undertaken as a component of the EIS, which will assess the potential hazards and risks associated with the Project in accordance with the requirements of Chapter 3 of the Resilience and Hazards SEPP. In addition, it will determine whether the Project should be considered a potentially hazardous industry.

The PHA will evaluate the potential safety issues and impacts during construction and operation of the Project including emergency matters and propose management and mitigation measures where appropriate. It will include a detailed risk assessment for construction and operational hazards and risks for the Project, and will incorporate the following:

- Operational Hazards and Risk Assessment; and
- Construction Safety Study.

The PHA will be prepared in accordance with the following guidelines and resources:

- Hazardous and Offensive Development Application Guidelines: Applying SEPP 33 (Department of Planning, 2011);
- Assessment Guideline: Multi-level Risk Assessment (Department of Planning and Infrastructure, 2011);
- Hazardous Industry Planning Advisory Paper No 6: Hazard Analysis (Department of Planning, 2011); and
- Hazardous Industry Planning Advisory Paper No 7: Construction Safety (Department of Planning, 2011).

6.7.2 Airspace

6.7.2.1 Existing Environment

The WSSC is located approximately 7 km north of the proposed Western Sydney International (Nancy-Bird Walton) Airport (Western Sydney Airport). The airport is currently under construction and being built in stages, with the first phase expected to be completed by 2025.

The protected airspace of Western Sydney Airport is known as the Obstacle Limitation Surface (OLS), which has been declared under the provisions of the Airports Act 1996 (Cth) and Airports (Protection of Airspace) Amendment Regulation 1996. The purpose of the OLS is to protect aircraft flying in close proximity to the Western Sydney Airport and ensure that development within the OLS area is examined for its impact on future aircraft operations (WSA Co, 2019).

The WSSC is located approximately 800 m northwest of the northern approach runway at the Western Sydney Airport and is positioned within the area affected by the OLS (refer **Figure 6-3**). Development that infringes on the airport's protected airspace is considered a controlled activity and can include, but is not limited to:

- permanent structures, such as buildings, intruding into the protected airspace;
- temporary structures such as cranes intruding into the protected airspace; or
- any activities causing intrusions into the protected airspace through glare from artificial light or reflected sunlight, air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter.



A search of the WSSC was undertaken on the Western Sydney Airport Safeguarding Tool (WSA, 2022). The results of the search are provided in **Table 6-11**.

Table 6-11	Airport Safeguarding Tool Search Results
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Feature	Value
Ground Elevation (AHD)	55.5 m
OLS Elevation (AHD)	230.5 m
OLS Height Relative to Ground Level	175 m
Wildlife Hazard Zones	8-13 km
Lighting Buffer Area	No
Inside Windshear Assessment Zone	No

The search identified an OLS elevation of 230.5 m (AHD) and OLS height of 175 m (relative to ground level) apply at the WSSC. The search also indicated that development at the WSSC may infringe on the protected airspace associated with Bankstown Airport, which is located approximately 20 km to the southwest of the WSSC.

6.7.2.2 Assessment Approach

An airspace risk assessment will be undertaken for the EIS due to the location of the WSSC within the OLS of Western Sydney Airport. The assessment will assess any potential impacts to aviation safety associated with the Project to ensure that development within the OLS area is examined for its impact on future aircraft operations. The assessment will address any aviation concerns raised during consultation with the community and key stakeholders, and identify relevant mitigation strategies to be implemented where required.

The assessment will include consideration of:

- the proximity of the proposed exhaust stacks and impact of heat and plumes on aircraft operations;
- potential impacts to aviation safety including wake / turbulence issues;
- air traffic routes, heights procedures, radar and communications systems and navigation aids;
- potential impacts on aerial emergency services, aerial firefighting, and aerial agricultural operations; and
- potential impacts on the protected airspace of Bankstown Airport.

In addition, the Project will require an approval from the Western Sydney Airport Corporation to carry out a Controlled Activity within the airport's protected airspace. The following information will be required in the application:

- location of the proposed controlled activity (using geographic coordinates);
- details of the proposed controlled activity, including the activity's purpose, the proposed maximum height (above AHD) of the proposed structure, and the times that the controlled activity will intrude into the protected airspace, if it is a temporary controlled activity; and
- provision of relevant maps, plans or local council development application information that provides further details of the proposed activity.

6.7.3 Contamination

6.7.3.1 Existing Environment

A search of the POEO Act register (NSW EPA, 2021) identified that an Environmental Protection Licence (EPL) was issued to BlueScope on 09 June 2006 for the WSSC (EPL 12495). Additionally, a search of the list of NSW contaminated sites notified to the EPA (NSW EPA, 2021) identifies the WSSC as a contaminated site, however notes that regulation under the Contaminated Land Management Act 1997 is not required.

Contamination at the WSSC has also previously been assessed prior to the development of the CPL8. HLA Envirosciences Pty Ltd undertook a Phase 1 Environmental Site Assessment (2004b) to identify opportunities and constraints to the development of CPL8. The assessment noted the historical uses of the WSSC and surrounds, which included:

- agricultural uses (early 1880s to 1960);
- extractive industry, including quarrying of basic igneous rock and stockpiling of quarry overburden (quarrying at the site ceased in the early 1990s);
- vacant land;
- model aeroplane club operation;
- clay excavation (to the east of the landfill);
- airstrip (no longer in use); and
- non-authorised use by the public (use of recreation vehicles, use of airstrip).

Based on the historical landuses, HLA Envirosciences (2004b) concluded that there was little evidence for significant contamination-related constraints to future industrial development on the WSSC. BlueScope also undertook a comprehensive Contamination Assessment Study and Report which included a comprehensive investigation along the western boundary of the WSSC, adjacent to the Erskine Park Landfill site. No areas of contamination were identified as a result of the assessment, and there was no evidence of soil contamination on-site.

6.7.3.2 Assessment Approach

An assessment of soil contamination will be undertaken as a component of the EIS. The assessment will involve undertaking a review of existing operations and land use to confirm that there are still no areas of soil contamination present at the WSSC.

The assessment will incorporate the following:

- a review of the previous environmental investigations, regulatory agency statements / reports and other relevant databases searches;
- a site inspection to confirm available information collected during the desktop assessment; and
- a draft Preliminary Site Investigation report will be prepared in accordance with NSW EPA regulatory guidance if the results of the review and site inspection indicate it is required.

6.7.4 Bushfire

6.7.4.1 Existing Environment

Bushfire presents a threat to human life and assets and can adversely impact ecological values. Bushfire risk can be considered in terms of environmental factors that increase the risk of fire (fuel quantity and type, topography and weather patterns), as well as specific activities (such as hot works and construction activities) or infrastructure components that exacerbate combustion or ignition risks (such as transmission lines and other electrical components).

A review of the NSW RFS Bushfire Prone Land mapping (RFS, 2015) confirms that the WSSC is not currently recognised as bushfire prone. However, other neighbouring properties to the north, south, and southeast are mapped as bushfire prone land (refer to **Figure 6-4**).

6.7.4.2 Assessment Approach

The EIS will include a Bushfire Risk Assessment, which will aim to identify potential hazards and risks associated with bushfires / use of bushfire prone land. The assessment will aim to demonstrate that the Project can be designed, constructed and operated to minimise ignition risks and provide for asset protection consistent with the *NSW Rural Fire Service Guidelines - Planning for Bushfire Protection 2019* (RFS, 2019).

The Bushfire Risk Assessment and mitigation strategies will be guided by the following factors that contribute to bushfire risk:

- fuels, weather, topography, predicted fire behaviour and local bushfire history;
- suppression resources, access (roads, tracks) and water supply; and
- values and assets.

Mitigation will be a combination of complementary strategies, all of which are required to provide the best possible protection outcome for the WSSC and the community.



6.8 Water Resources

6.8.1 Existing Environment

Hydrology

The WSSC is located within the broader Hawkesbury-Nepean Catchment, which is the longest coastal river catchment in NSW stretching across a total area of 21,400 km² (DPI, 2020). Locally, it is situated within the Wianamatta South Creek catchment surrounding South Creek, which is a tributary of the Hawkesbury-Nepean River. The overall topography of the WSSC is relatively flat at approximately 48 – 54 metres ASL with only slight variances in elevation. The local hydrology is displayed in **Figure 6-5**.

South Creek is located approximately 2.4 km west of the WSSC, which drains a 624 km² catchment in Western Sydney (DPE, 2021). South Creek originates near the former Oran Park Raceway, approximately 4 kilometres north-east of Narellan and generally flows to the north. It is joined by seventeen tributaries including Badgerys Creek, Kemps Creek, Ropes Creek and Eastern Creek, before finally connecting to the Hawkesbury River near Windsor, approximately 25 km to the north of the WSSC (SKM, 2004). South Creek descends 94 metres over its total length of 70 kilometres.

The WSSC itself drains from the east to west into two small ephemeral creeks, including one located to the north of the site and the other to the south (described as northern and southern creeks). The northern creek runs parallel to the southern side of Lenore Lane, and the southern creek flows towards the southwest to the west of the Erskine Park Industrial Estate. The creeks converge to the south of Erskine Park Road and ultimately join South Creek approximately 1.5 km to the north west of the WSSC. During previous site inspections, no water flow was observed within the northern and southern creeks (SKM, 2004).

Ropes Creek is another watercourse that forms part of the broader Hawkesbury-Nepean Catchment and the Wianamatta South Creek Catchment. It is located approximately 4 km east of the WSSC. Ropes Creek originates approximately 4 km northeast of Cecil Park in south-west Sydney and flows north to the suburb of Ropes Crossing where it connects onto South Creek north of Wianamatta Regional Park. Ropes Creek descents 68 metres over its total length of 23 kilometres.

Flooding

The Wianamatta (South) Creek Catchment Existing Flood Risk Assessment (Advisian, 2020) assessed the existing flood risks within the Wianamatta (South) Creek Catchment. The assessment draws upon a number of previous hydrologic and hydraulic investigations that were undertaken to examine the nature and extent of flooding along South Creek, including:

- 'Flood Study Report, South Creek' (Department of Water Resources, 1990);
- 'South Creek Floodplain Management Study' (Willing and Partners Pty Ltd, 1991);
- 'ADI St Mary's Watercycle & Soil Management Study Final Study Report' (Sinclair Knight Merz, 1998);
- 'Austral Floodplain Risk Management Study and Plan' (Perrens Consultants, 2003);
- 'South Creek Floodplain Risk Management Study and Plan' (Bewsher Consulting, 2004);
- 'Upper South Creek Flood Study' (WMA Water, 2012);
- 'Upper South Creek Floodplain Risk Management Study and Plan' (Cardno, 2014);
- 'Updated South Creek Flood Study' (WorleyParsons, 2015); and
- 'South Creek Floodplain Risk Management Study and Plan' (Advisian, 2020).

The assessment notes the following in relation to flooding in the Wianamatta (South) Creek Catchment:

- Floodwaters from South Creek have the potential to inundate large areas of land across six Local Government Areas (LGA) including Penrith, Blacktown, Liverpool, Fairfield, Camden and Hawkesbury;
- Flooding of South Creek generally occurs from the local catchment runoff that breaks out of the main channel and spills across the adjoining floodplain;
- The lower reaches of South Creek serve as a large flood storage area during major flooding of the Hawkesbury-Nepean River system; and
- Floodwaters can 'back-up' along South Creek from its confluence with the Hawkesbury River, leading to inundation of areas of the South Creek floodplain to beyond the area that would typically be flooded.

It is noted that the WSSC is approximately 48 – 54 metres ASL and is not within a floodplain or a major drainage pathway (SKM, 2004). The WSSC is above the 1 in 100-year flood level, and the existing drainage has been designed to direct the 100 year ARI flows downstream, rather than cause localised flooding. Therefore, there is low risk of chemicals or other materials being released to the environment due to flooding, and the overall flood risk of the WSSC is considered to be very low (SKM, 2004).

Under the *Water Management Act 2000*, water access licences and controlled activity approvals are required for certain activities. While the Project may require water access licences, approval for controlled activities is not required for SSD projects.

6.8.2 Assessment Approach

A Water Impact Assessment will be undertaken for the Project, which will include a review of standard construction environmental management plans to ensure that impacts during excavation, road works, transport of machinery, etc. are adequately mitigated through avoidance, minimisation and management. The assessment will detail the environmental values of the water resources and assess the potential impacts of the project on those values. Areas of greatest focus for the Project will be construction phase stormwater quality and operational phase management of potential contaminants through appropriate controls.

In addition, the assessment will also:

- consider the potential impacts of the Project on hydrology and groundwater and determine the need for further hydrological investigations;
- review the onsite and offsite effects of the project on surface water, through understanding water demands and supplies, water management measures, water reuse and recycling and water treatment;
- assess flood risks and floodwater interaction with the WSSC;
- identify and quantify sources of water required during construction and operation of the Project; and
- determine whether any water access licences under the Water Management Act 2000 will be required. All required licences and approvals will be obtained prior to the commencement of construction activities.

The Water Impact Assessment will be generally undertaken in accordance with the following guidelines and resources:

- Managing Urban Stormwater; Soils & Construction (Landcom, 2004);
- Floodplain Risk Management Guidelines (Department of Environment and Climate Change, 2016); and
- Floodplain Development Manual: The management of flood liable land (NSW Government, 2005).



6.9 Land Resources

6.9.1 Existing Environment

Soils

The 1:100,000 Soil Landscape Map for Penrith (DPIE, 2010) indicates that the site and surrounding area fall within a large area of the Blacktown Soil Group, which is generally associated with the Bringelly Shale geological unit. Blacktown soil group comprises residual soils most commonly associated with gently undulating rises on Wianamatta Group Shales (of which the Bringelly Shale unit is a part). The soils are typically shallow to moderately deep, hardsetting mottled texture soils, with red and brown podsolic soils occurring on crests and yellow podsolic soils downslope and in drainage lines. The soils of the Blacktown group generally display moderate reactivity and are highly plastic with low fertility and poor drainage.

A preliminary review of the Soil and Land Capability Mapping data for NSW (OEH, 2012) suggests there are two land and soil capability (LSC) classes within the WSSC. The eastern sections of the WSSC are classified as *Class 4 – Moderate to severe limitations*, whilst the western sections of the WSSC are classified as *Class 6 – Very severe limitations*. To the west of the WSSC, the Erskine Park Landfill site across an area of approximately 13 ha is classified as Disturbed Terrain with a Capability Score of 98.

A search of the Australian Soil Classification (ASC) Soil Type Map of NSW (OEH, 2017), reveals that the WSSC is dominated by Kurosols (KU) soils. Kurosols have strong texture contrast between the surface (A) horizons ad the clay subsoil (B) horizons. Kurosols have a strong texture contrast with a strongly acid B horizon that may or may not be sodic. Kurosols form from parent materials that are highly siliceous, siliceous to intermediate in composition and where rainfall is from 50 to 1350 mm in poorly drained sites or 750 to 1300 mm on well-drained sites. The surface of Kurosol soils are often acidic. They generally have very low agricultural potential with high acidity (pH < 5.5) and low chemical fertility. Kurosols commonly have low water-holding capacity and are often sodic. A map of land and soil capability classes in the vicinity of the WSSC is provided in **Figure 6-6**.

Geology and Surrounds

The Penrith 1:100 000 Geological Map Sheet (GSNSW, 1991) indicates that the Bringelly Shale is the primary lithological unit in the Erskine Park area. The Bringelly Shale unit is a subgroup of the Wianamatta Shale Group, and is comprised of claystone, siltstone and laminate with sporadic sandstone bodies throughout. The formation is defined by a persistent sandstone horizon (the Minchinbury Sandstone), and the Bringelly Shale unit is generally overlain by residual clay soils of medium to high plasticity.

As noted previously, the Erskine Park Landfill is located to the west of the WSSC. The Erskine Park Landfill site and surrounds to the west of the WSSC contain the remains of an outcrop of the Erskine Park Diatreme, which is comprised of a typical volcanic breccia covering an area of approximately 12 hectares. The diatreme was subject to quarrying at a site immediately to the west of the WSSC.

6.9.2 Assessment Approach

An assessment of the soil and landform of the WSSC will be undertaken for the EIS. The assessment will consider the impacts of soil disturbance and erosion from excavation works and propose mitigation measures during construction and operation of the Project. The assessment will also incorporate the following:

- Geotechnical Assessment; and
- Landfill Gas Assessment.

The aim of the Geotechnical Assessment will be to assess the subsurface soil and groundwater conditions across the WSSC, in order to determine:

- an appropriate site classification in accordance with the requirements of AS2870-2011 (Residential Slabs and Footings);
- an appropriate foundation system for the Project's footing options;
- suitable parameters for the design of new pavements; and
- site preparation measures for buildings and pavements together with any earthworks requirements.

The aims of the Landfill Gas Assessment will be to assess the potential risk to the Project resulting from the possible presence of landfill gas or other hazardous ground gas, and recommend appropriate mitigation measures. The scope of works is likely to involve:

- review of available relevant information relating to Project;
- review of available information on the ground conditions beneath and adjacent to the WSSC;
- consideration of available landfill gas monitoring data; and
- qualitative assessment of risk and development of mitigation recommendations.

The assessments will be undertaken in accordance with the following guidelines and resources:

- Soil and Landscape Issues in Environmental Impact Assessment (OEH, 2000);
- AS 2870-2011: Residential Slabs and Footings; and
- Assessment and Management of Hazardous Ground Gases: Contaminated Land Guidelines (EPA, 2020).



6.10 Air Quality

ERM prepared an air emission review to support the consideration of establishing the Project at the existing WSSC. The air emission review is contained as Attachment B of the OIDM (**Appendix D**) and is summarised within this section.

The following scope of works were undertaken for the air emission review:

- a review and comparison of existing emissions from the WSCC and nearby industry;
- a review and comparison of existing and future WSCC emissions (i.e. inclusive of MCL7);
- commentary on the process of air quality impact assessment and licencing in the avoidance of adverse impacts in the locality; and
- a summary of key findings and relevant conclusions.

6.10.1 Existing Environment

ERM has undertaken a review of emissions from the existing WSSC operations and other facilities in close proximity. The following sections provide National Pollutant Inventory (NPI) reported substances and emissions (in kg per reporting year) and further information on emissions for existing and proposed BlueScope operations.

6.10.1.1 Existing Operations at WSSC

The existing operations at the WSSC include CPL8 operations. Emissions from the operations are vented via three point sources (stacks). The EPA identifiers (IDs) for these stacks are as follows:

- EPA ID #1 Chemical Coater Drier and Coater Room Stack;
- EPA ID #2 Oven Exhaust (RTO) Stack; and
- EPA ID #3 Air Quench Exhaust Stack.

Table 6-12 presents the NPI reported substances and emissions (in kg) for 2019/2020 for the WSSC operations. The key pollutants of focus for this review have been nominated as oxides of nitrogen (NO_x) and volatile organic compounds (VOCs), as they are considered useful in qualifying prospective changes to the WSSC emission profile with introduction of MCL7.

Table 6-12 WSSC NPI reported substances and emissions- 2019/2020 (kg)

Substance	Air total (kg)	Air fugitive	Air point
Acetone	460	-	460
Arsenic & compounds	0	-	0
Beryllium & compounds	0.13	-	0.13
Cadmium & compounds	1.2	-	1.2
Carbon monoxide (CO)	5700	-	5700
Chromium (III) compounds	2.9	-	2.9
Chromium (VI) compounds	0.22	-	0.22
Copper & compounds	1.4	-	1.4
Cumene (1-methylethylbenzene)	180	-	180
Fluoride compounds	210	-	210
Hydrochloric acid	520	-	520
Lead and compounds	4.2	-	4.2
Mercury and compounds	0	-	0
Methyl isobutyl ketone	570	-	570

Substance	Air total (kg)	Air fugitive	Air point
Nickel & compounds	1.1	-	1.1
Oxides of nitrogen (NO _x)	6400	-	6400
Particulate matter (PM10)	3300	-	3300
Particulate matter (PM2.5)	410	-	410
Polychlorinated dioxins and furans (TEQ)	5.20 x 10 ⁻⁰⁷	-	5.20 x 10 ⁻⁰⁷
PAhs (B[a]Peq)	0.05	-	0.05
Sulfur dioxide (SO2)	63	-	63
VOCs	8400	-	8400
Xylenes (individual or mixed isomers)	1200	-	1200

Note: key pollutants for this review are shown in **bold italic** font.

Source: NPI, 2021a

Table 6-13 presents the existing stack parameters and emission characteristics for each stack as derived from emission monitoring data.

Parameter	EPA ID#1	EPA ID#2	EPA ID#3	Units
Stack locations	295 793, 6255 675	295 791, 6255 681	295 772, 6255 690	MGA94
Stack height	30	30	30	m
Stack diameter	1.92	2.22	1.82	m
Temperature*	42	241	33	°C
Velocity*	15	11	9	m/s
Flow*	21	15	13	Nm³/s (dry)
Concentration*				
VOC as n-propane	8.0	1.5	2.4	
NO _x as NO ₂	-	21.3	-	mg/inm ³
Estimated Emission rate*				
VOC as n-propane	5,298	710	984	kahur
NO _x as NO ₂	-	10,076	-	ку/уг

Table 6-13 Existing stack parameters for the WSSC

Source: BlueScope Steel Limited, 2021a,b. Note: *Average value from testing data.

6.10.1.2 Surrounding Industry

A search of the NPI website has shown that there are three facilities within 2 km of the WSSC that reach activity thresholds for reporting of emissions under the NPI, and these are provided in **Table 6-14** below. Details for the reported substances and emissions are provided in the following sections.

Table 6-14Industry within 2 km of WSSC with NPI reported substances and
emissions

Name	Address	Industry type	Distance and bearing from the WSSC
Goodman Field Consumer Foods	16 Templar Road, Erskine Park	Other food product manufacturing (119)	~200 m (north east)
Enviroguard Erskine Park Landfill	50 Quarry Road, Erskine Park	Waste treatment, disposal and remediation services (292)	~1 km (west)
Saputo Dairy Australia	111-113 Quarry Road, Erskine Park	Dairy Product Manufacturing (113)	~1.5 km (west)

The reported NOx and total VOC emissions have been compared for each of the three surrounding facilities and WSSC and are presented in **Table 6-15** and **Table 6-16**. It is noted that the existing WSSC has higher NOx and total VOC emissions than the other facilities.

Table 6-15 Comparison of NPI reported VOC emissions - 2019/2020

Site	Total VOCs (kg)			
Sile	Air total	Air fugitive	Air point	
Goodman Fielder Consumer Foods	140	40	100	
Enviroguard Erskine Park Landfill	880	-	880	
Saputo Dairy Australia	61	-	61	
BlueScope WSSC	8,400	-	8,400	

Table 6-16 Comparison of NPI reported NOx emissions - 2019/2020

Site	NOx (kg)			
Site	Air total	Air fugitive	Air point	
Goodman Fielder Consumer Foods	1,800	19	1,781	
Enviroguard Erskine Park Landfill	1,600	230	1,370	
Saputo Dairy Australia	320	-	320	
BlueScope WSSC	6,400	-	6,400	

6.10.1.3 Background Air Quality

DPE operate two air quality monitoring stations (AQMS) in the local area of Erskine Park. **Table 6-17** presents a summary of the nearby AQMS locations, with proximity to Erskine Park. Monitoring data from 2017 to 2021 has been summarised in the following sections. For the purposes of the assessment, the key pollutant for background concentrations is nitrogen dioxide (NO₂).

Table 6-17 Summary of nearby AQMS with proximity to Erskine Park

AQMS location	Easting (kmE, MGA94)	Northing (kmE, MGA94)	Distance and bearing from the WSSC
St Marys	293 170	6258 083	3.5 km north west
Prospect	306 745	6258 645	11.5 km north east

NO₂ concentrations have been measured at both DPE AQMS locations mentioned in **Table 6-17**. Measured concentrations at all sites are within the NSW EPA impact assessment annual average criterion of 62 μ g/m³ and below the NEPM AAQ standards of 31 μ g/m³. The maximum 1-hour average concentrations are also well below the NSW EPA impact assessment criterion of 246 μ g/m³ and below the NEPM AAQ standard of 164 μ g/m³.

Higher NO₂ concentrations are recorded at Prospect compared with St Marys. There is no clear trend for St Marys; however, for Prospect it can be seen that both annual averages and maximum 1-hour average NO₂ concentrations have been reducing year on year since 2017.

There are no recorded background concentrations for total VOCs. It is noted that VOCs are assessed on an incremental basis, in the absence of background.

6.10.1.4 Proposed Operations at WSSC

MCL7 is being considered to the south of BlueScope's existing paint line at the WSSC. The proposed operations will include three point sources. **Table 6-18** presents the proposed stack parameters.

		1		1	
Parameter	Heating Furnace	Passivation Drying Oven	Resin Curing Oven	Units	
Stack locations	295 777, 6255 601	295 833, 6255 580	295 852, 6255 581	MGA94	
Stack height	39.2	31.1	31.1	m	
Stack diameter	2.5	0.6	0.3	m	
Temperature	473	119	354	°C	
Velocity	7	15	17	m/s	
Flow	5.1	2.5	2.8	Nm³/s	
Concentration*	Concentration*				
VOC as n- propane	0.6	0.6	1.1	mg/Nm³	
NO _x as NO ₂	39	22	-	J	
Estimated Emission rate*					
VOC as n- propane	97	47	94	kg/yr	
NO _x as NO ₂	6,273	1,734	-		

 Table 6-18
 Indicative stack parameters for MCL7

Source: BlueScope Steel Limited (2021a). *Average value from testing data.

Table 6-19 provides a summary of existing WSSC and potential MCL7 NO_x and VOC emissions, as based on averages of emission monitoring and flow data. Also shown is the total including MCL7, and the percentage increase that introduction of MCL7 would represent over the existing WSSC emissions.

Table 6-19 Summary of existing WSSC and MCL7 NOx and VOC emissions

Substance	Existing	MCL7 Estimate	Total	% Increase with addition of MCL7
VOC	6,992	241	7232	3%
NOx	10,076	8,007	18,083	79%

As shown in **Table 6-19**, the introduction of MCL7 at the WSSC would result in an increase in VOC and NOx emissions. For VOC, the magnitude of change is not considered to constitute a material change to the existing emission profile for the WSSC site. For NOx, there is a more substantial percentage increase, the potential impacts of which will be subject to further assessment within the EIS.

6.10.2 Assessment Approach

Air emissions from the existing and proposed operations at WSSC would be assessed within an Air Quality Impact Assessment (AQIA) that is conducted in accordance with *The Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA, 2017).

The AQIA will be required to demonstrate compliance with ambient air quality criteria that are applied in NSW as being protective of adverse air quality impacts. Where compliance is not demonstrated, the proponent is required to review emission control measures, and subsequently demonstrate that compliance is achieved. The EIS will include a qualitative assessment of potential air quality impacts for the construction phase of the project and propose appropriate management and mitigation measures. The EIS will also include a quantitative assessment of potential air quality impacts for operational air emissions.

Air emission limits developed within the AQIA are commonly carried into the EPL for the site, to ensure that adverse air quality impacts are not generated during the operational phase.

6.11 Waste Management

The EIS will quantify and classify the likely waste streams to be generated during construction and operation and describe measures to manage, reuse, recycle and dispose of this waste in accordance with the Waste Classification Guidelines (NSW EPA, 2014).

6.12 Cumulative Impacts

6.12.1 BlueScope Steel Paintline & Service Centre

The WSSC is situated within the Erskine Park industrial precinct and is surrounded by existing industrial uses and warehousing. The Project Site is located within the WSSC.

The BlueScope Steel Paintline & Service Centre was originally approved on 3 December 2004 under SSD Approval DA206-8-2004-I, and has been subject to six further modifications, as detailed in **Table 6-20**. The most recent modification (MOD 6) was approved on 12 September 2017, which increased the night-time sleep disturbance limit from 47dB to 54dB and removed operational noise limits.

Modification	Approval Date	Description
MOD 1	06 July 2005	Improved the stormwater drainage from the roof to the rainwater tanks and amend the development staging into two stages.
MOD 2	12 July 2006	Amended the size and design of buildings and associated facilities on the site.
MOD 3	25 July 2006	Corrected an administrative error.
MOD 4	02 April 2012	Amended conditions relating to noise and air monitoring and annual reporting requirements, and removing conditions referring to the construction phase of the development.
MOD 5	07 July 2014	Reduced the frequency of noise monitoring and removing the monitoring and reporting duplication between the consent and the EPL.
MOD 6	12 September 2017	Increased the night-time sleep disturbance limit from 47dB to 54dB and removed operational noise limits.

Table 6-20	Modifications to DA-206-8-2004-i
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The existing CPL8 has a total production capacity of 160 ktpa, however currently only produces approximately 120 ktpa of painted products due to its current 24/5 operations. The Project will increase the overall capacity of the WSSC by 80 ktpa to approximately 240 ktpa. Increasing the operational capacity and throughput volumes of the WSSC may have the potential to have cumulative impacts on the local environment. The potential cumulative impacts of the Project in relation to the operational features at the WSSC and key environmental aspects are discussed in **Table 6-21**.

Aspect	Potential Cumulative Impacts
Air Quality	Emissions from the operations at the existing CPL8 are vented via three point sources (stacks). As noted in Section 6.10 , the introduction of MCL7 at the WSSC would result in an increase in VOC of NOx emissions, however the magnitude of this change is not considered to constitute a material change to the existing emission profile for the WSSC. The potential cumulative impacts of the Project on air quality will be assessed within the AQIA prepared for the EIS.
Hazards	A Hazardous and Offensive Industry Screening Assessment (HOISA) was completed for the Project, comprising the Offensive Industry Development Memorandum (Appendix D) and Hazard Assessment (Appendix E). The HOISA concluded that, following a Preliminary Hazard Assessment (PHA) prepared to support the DA, the Project could be deemed as 'potentially hazardous and/or offensive industry'. Hazards have been identified as a key environmental aspect of the Project. As such, the potential cumulative impacts of the Project in relation to hazards will be assessed within the PHA prepared for the EIS.
Noise	 The existing noise compliance requirements for the WSSC under DA-206-8-2004-i (MOD 6) include: 35 dBA during the day, evening and night; and 54 dBA at night (night-time sleep disturbance). As noted in Section 6.2.2, the operation of MCL7 is expected to comply with these existing noise requirements at the WSSC. The Project is predicted to have an insignificant impact in the locality and on the existing and future development on nearby land zones in the locality, and is unlikely to result in significant cumulative impacts.
Traffic	 Current traffic movements at the WSSC comprise an average of 144 truck movements per week including: 58 inbound truck movements; 86 outbound truck movements; and Seven (7) backload truck movement. The Project, involving the placement of MCL7 on site will result in a net increase of: 49 inbound feed truck movements per week; and 103 outbound truck movements has the potential to have cumulative impacts on local traffic. Potential cumulative impacts of the Project on traffic will be subject to detailed assessment within the TIA prepared for the EIS.
Visual	 Three (3) exhaust stacks proposed for the Project, which would have potential to create visual impacts for nearby receivers. These include: a furnace stack at a height of approximately 39 m agl; a passivation stack at a height of approximately 33 m agl; and a resin stack at a height of approximately 31 m agl. MCL7 will be visually integrated within the existing industrial character of the WSSC and its surrounding areas, and will therefore minimise visual impacts on the built form resulting from the Project. The potential cumulative impacts on the visual landscape from the Project will be subject to further assessment within the LVIA prepared for the EIS

Table 6-21 Potential cumulative impacts associated with existing operations

6.12.2 Cumulative Impact Assessment Approach

The Cumulative Impact Assessment Guidelines for State Significant Projects (DPIE, 2021c) provides a framework for assessing and managing project-level cumulative impacts. The guideline defines six key steps in cumulative impact assessment, as detailed in **Figure 6-7**.



Figure 6-7 Key steps in cumulative impact assessment

Source: (DPIE, 2021c)

The cumulative impact assessment to be undertaken as part of the EIS is scoped during the Scoping Report phase, and is to include consideration of key questions, as detailed in **Table 6-22**. The potential cumulative impacts during each stage of the Project are outlined in **Table 6-23**.

Scoping Questions	Considerations	Commentary
What to assess	Government strategic planning framework for the area having regard to any relevant legislation, plans, policies or guidelines The Project and other potentially relevant future projects that may be developed over the same time period or similar timeframes as the Project Potentially material impacts on features including National Parks and other protected areas, environmentally sensitive areas, threatened species and ecological communities, important natural resources, culturally significant resources, key infrastructure and industries, sensitive landuse zones, population centres, settlements and residential areas. The likely scale and nature of the cumulative impact of these projects.	 Consideration of key legislation, plans, policies or guidelines is provided in Section 4. Site setting and features from a regional and local context are discussed in Section 2.1, which notes: The WSSC contains the existing CPL8 facility operated by BlueScope. The key land uses and economic activities within the immediate vicinity of the WSSC are industrial. The nearest residential receptors are located approximately 780 m north of the WSSC in Erskine Park The Erskine Park Landfill Site is located to the west of the WSSC. Local watercourses include South Creek 2.4 km west of the WSSC. The WSSC is located in the Erskine Park industrial precinct and is surrounded by a number of industrial developments as detailed in Section 2.1.3. There is potential for the impacts of these proposed projects to combine with the potential visual and environmental impacts of the Project, generating cumulative impacts that are greater than the impact of each project individually.
What study area	Study area selected for the cumulative impact assessment of each matter will vary depending on the specific characteristics of the assessment matter and the scale and nature of the potential impacts on the matter resulting from the project with other relevant future projects.	The study area for each matter will be subject to cumulative assessment, and will be guided by the relevant technical assessments and locality features.
Over what time period	Like the study area, the time period selected for the cumulative impact assessment on each matter will vary depending on the characteristics of the matter and the scale and nature of the potential impacts on the matter. In most cases, the period selected is likely to match the life of the project (e.g. 25 years). However, in some cases the period selected may be much shorter than this and cover a single phase of the project, or much longer.	 The proposed timeframe for the development of the Project is: Planning and Approvals: completion early 2023 Construction: 2023-2024 (two years) Operation: from 2025 (minimum 30 years) Various levels of cumulative impacts may occur during the various Project phases, as detailed in Table 6-23.
What projects to include	Build upon past and current operating project assessments by considering the cumulative impacts of the proposed project on key matters when other future proposed projects are included in the assessment.	The WSSC is located in the Erskine Park industrial precinct and is surrounded by a number of industrial developments as detailed in Section 2.1.3 . There is potential for the impacts of these proposed projects to combine with the potential visual and environmental impacts of the Project, generating cumulative impacts that are greater than the impact of each project individually. There may also be cumulative benefits to local communities from these projects, through the creation of new employment opportunities and through their contribution to the local and regional economies.

Table 6-22 Scoping Cumulative Impacts – Key Questions

Project Phase	Estimated Timeframe	Likely Scale of Impact	Duration of Impact	Potential Cumulative Impacts
Assessment	By late 2022	Minor	Temporary	Social – community health and wellbeing
Approval	Early 2023	Minor	Temporary	Social - community health and wellbeing
Construction	2023 - 2024	Moderate	Temporary	Amenity – noise Transport and traffic Air Quality Other environmental (biodiversity, heritage)
Operation	2025 - 2055	Moderate	Ongoing during operations	Amenity – noise Transport and traffic Air Quality
Decommissioning	Post 2055	Moderate	Temporary	Social – community health and wellbeing Amenity – noise Transport and traffic

Table 6-23 Cumulative Impacts and Timeframes

Consideration of cumulative impact is provided in the Scoping Summary Table (**Appendix A**). In addition, a cumulative assessment will be undertaken as a component of the EIS in accordance with the Cumulative Impact Assessment Guidelines for State Significant Projects (DPIE, 2021c).

7. CONCLUSION

A preliminary environmental assessment was undertaken to identify the potential matters associated with the proposed construction and operation of the Project that will require further assessment in the EIS. This preliminary assessment considered:

- the scale and nature of the likely impacts of the Project and the sensitivity of the receiving environment;
- whether the Project is likely to generate cumulative impacts;
- the ability to avoid, minimise and/or offset the impacts of the Project, to the extent known at the scoping stage; and
- the complexity of the technical assessment of the Project.

Detailed assessments will be undertaken for environmental aspects that present a potential high constraint to the development, and other aspects which require detailed assessment, but do not pose a high risk constraint. The assessments will include:

Level of Assessment	Aspect
Detailed	Access – Traffic and Transport Hazards and Risks - Preliminary Hazard Analysis Air Quality
Standard	Amenity – Visual Amenity – Noise Biodiversity Heritage – Aboriginal Cultural and Historic Social Hazards and Risks – Airspace Hazards and Risks – Contamination Hazards and Risks – Bushfire Water Resources Land Resources

Table 7-1 Proposed Assessment

The EIS will be prepared in accordance with the SEARs to be issued by DPE in response to this Scoping Report. All assessments (including specialist assessments) will be completed by taking into consideration consultation with stakeholders and industry best practice guidelines.

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APPENDIX A SCOPING SUMMARY TABLE

Scoping Summary Table

Level of Assessment	Matter	Scale of Impact ³	Nature of Impact ⁴	Sensitivity of receiving environment ⁵	Mitigation Measures Required	Cumulative Impact Assessment	Engagement	Relevant government plans, policies and guidelines	Scoping Report Reference
Detailed	Access - Traffic and Transport	High	Direct Indirect Cumulative	Sensitive (disturbance to other road users)	Likely	Yes	Specific	 Guide to Traffic Generating Developments (RTA, 2002) Austroads <i>Guide to Road Design</i> Austroads Guide to Traffic Management 	Section 6.5
Detailed	Hazards and Risks – Preliminary Hazard Analysis	Moderate	Direct Indirect Perceived	Sensitive (safety)	Likely	Yes	General	 Hazardous and Offensive Development Application Guidelines: Applying SEPP 33 (Department of Planning, 2011) Assessment Guideline: Multi-level Risk Assessment (Department of Planning and Infrastructure, 2011) Hazardous Industry Planning Advisory Paper No 6: Hazard Analysis (Department of Planning, 2011) Hazardous Industry Planning Advisory Paper No 7: Construction Safety (Department of Planning, 2011) 	Section 6.7.1
Detailed	Air Quality	Moderate	Direct Indirect Cumulative Perceived	Sensitive (local air quality)	Likely	Yes	General	 The Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2017). National Greenhouse Accounts Factors (Australian Government, 2021) NSW Climate Change Policy Framework (Office of Environment and Heritage, 2016) 	Section 6.10
Standard	Amenity – Landscape and Visual	Moderate	Direct Cumulative Perceived	Sensitive (receptors)	Likely	Yes	General	 Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment Third Edition (2013) 	Section 6.2.1
Standard	Amenity – Noise and Vibration	Moderate	Direct Cumulative Perceived	Sensitive (receptors)	Likely	Yes	General	 EPA NSW Noise Policy for Industry (NPI) 2017 The NSW Department of Environment and Climate Change, Interim Construction Noise Guideline (ICNG) (DECC, 2009) NSW Road Noise Policy (RNP) (DECCW, 2011) NSW Department of Environment and Conservation, Assessing Vibration: a technical guideline (DEC, 2006). 	Section 6.2.2
Standard	Hazards and Risks - Airspace	Moderate	Direct	Sensitive (impacts to aviation activities)	Likely	No	Specific	 The Civil Aviation Regulation 1988 The Civil Aviation Safety Regulations 1998 	Section 6.7.2
Standard	Biodiversity	Low	Direct Indirect	Sensitive (ecological values)	Likely	No	General	 Biodiversity Assessment Methodology (DPIE, 2020) Commonwealth EPBC 1.1 Significant Impact Guidelines – Matters of National Environmental Significance (Commonwealth of Australia, 2013) Commonwealth Department of the Environment – Survey Guidelines for Nationally Threatened Species (various) 	Section 6.3
Standard	Heritage – Aboriginal Cultural and Historic	Low	Direct Indirect	Sensitive (heritage values, cultural values)	Likely	No	Specific	 Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010) The NSW Heritage Manual (NSW Heritage Office, 1996) The Australia ICOMOS Charter for Places of Cultural Significance (The Burra Charter, 2013) 	Section 6.4
Standard	Social	Low	Direct Indirect Cumulative Perceived	Sensitive (social, environmental and economic values)	Likely	Yes	Specific	 Social Impact Assessment Guideline for State Significant Projects (DPIE, 2021b) Technical Supplement: Social Impact Assessment Guideline for State Significant Projects (Technical Supplement) (DPIE, 2021e) 	Section 6.6

 ³ Scale of Impacts – based on the severity of the impact, the geographical location and the duration of the impact as detailed in Appendix C of State Significant Development Guidelines – Preparing a Scoping Report (DPIE, 2021).
 ⁴ Nature of Impact - type of impact, i.e. direct, indirect, cumulative, perceived, as detailed in Appendix C of State Significant Development Guidelines – Preparing a Scoping Report (DPIE, 2021).

⁵ Sensitivity of the receiving environment – expressed in legislation, societal values, or vulnerability to change, as detailed in Appendix C of State Significant Development Guidelines – Preparing a Scoping Report (DPIE, 2021).

Level of Assessment	Matter	Scale of Impact ³	Nature of Impact ⁴	Sensitivity of receiving environment ⁵	Mitigation Measures Required	Cumulative Impact Assessment	Engagement	Relevant government plans, policies and guidelines	Scoping Report Reference
Standard	Hazards and Risks - Contamination	Low	Direct Indirect	Sensitive (safety)	Likely	No	General	 Managing Land Contamination: Planning Guidelines SEPP 55 - Remediation of land (Department of Urban Affairs and Planning and Environment Protection Authority, 1998) 	Section 0
Standard	Hazards and Risks – Bushfire	Low	Direct Indirect	Sensitive (safety)	Likely	No	General	 Planning for Bushfire Protection 2019 – NSW Rural Fire Service (RFS, 2019) 	Section 6.7.4
Standard	Water Resources (flooding and hydrology)	Low	Direct Indirect	Sensitive (local hydrology and water quality)	Likely	No	General	 Managing Urban Stormwater; Soils & Construction (Landcom, 2004) Floodplain Risk Management Guidelines (Department of Environment and Climate Change, 2016) Floodplain Development Manual: The management of flood liable land (NSW Government, 2005) 	Section 6.8
Standard	Land Resources (soils, landfill gas, geotechnical)	Low	Direct Indirect	Sensitive (environmental values, landuse)	Likely	No	General	 Soil and Landscape Issues in Environmental Impact Assessment (OEH, 2000); AS 2870-2011: Residential Slabs and Footings; and Assessment and Management of Hazardous Ground Gases: Contaminated Land Guidelines (EPA, 2020). 	Section 6.9
Standard	Waste Management	Low	Direct Indirect	Sensitive (environmental values, safety)	Likely	No	General	 Waste Classification Guidelines (DECCW, 2009) 	Section 6.11

APPENDIX B STAKEHOLDER ENGAGEMENT STRATEGY



DRAFT Stakeholder Engagement Strategy (SES)

Western Sydney Service Centre MCL7 Project

1 May 2022



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1. Project Overview

BlueScope produces a wide range of steel products with operations located in Australia and across the world. The Western Sydney Service Centre (WSSC), located at Erskine Park's Industrial Precinct, opened in 2008 and is a renowned world-class painted steel facility.

The demand for essential steel components used in building and construction is increasing and to meet this strong demand BlueScope is proposing to install a new Metal Coating Line (MCL7) adjacent to the existing paintline at the WSSC site.

MCL7 will complement the existing paintline operations at WSSC by providing up to 240,000 tonnes of additional capacity to feed production across COLORBOND®, ZINCALUME®, and TRUECORE® steel products, used for roofs, house frames and fencing.

The Project will require approval from the NSW Government. To formally initiate this process, BlueScope will prepare a Scoping Report to submit to the NSW Government signally the start of the approval process.

The purpose of the Project Stakeholder Engagement Strategy (SES) is to provide an overview of the communication and engagement activities and timing including key engagement during each phase of the regulatory approvals process.

1.1 Objectives

The MCL7 SES documents the communications and consultation framework and activities that will be undertaken by BlueScope during the Project lifecycle spanning across development, construction and operational phases.

The strategy is intended to establish proactive communication and engagement with stakeholders in the community and help ensure that their concerns or issues are clearly understood and resolved.

The objectives of this strategy are to:

- Identify stakeholders with an interest in the Project;
- Develop a clear action plan for future engagement approaches across all stakeholder groups;
- Outline communications tools and channels;
- Provide clear, consistent and compelling messages about the benefits of the development;
- Identify opportunities for stakeholders and the community to raise concerns and provide feedback; and
- Identify opportunities to build positive sentiment across local media, businesses and other stakeholders.

The current version of the SES was prepared based on the information available at the time, and as part of the Scoping Report to be submitted to the NSW Government Department of Planning and Environment (DPE) in support of an application for Secretary's Environmental Assessment Requirements (SEARs) for the Project. The SES is a working document and will be updated over the project lifecycle.

1.2 Background

The engagement approach recognised that Erskine Park is a unique area with the location of the Project positioned in an industrial precinct on the southern outskirts of the town. The existing Western Sydney Service Centre operation was commissioned 15 years ago, and at the time, was one of the first industrial facilities located in the Erskine Park Business Park. Today, the precinct is sprawling with light to heavy industrial users and is a key business amenity with easy access to a broad range of Western Sydney markets.

Erskine Park, along with Colyton, are the easternmost suburbs in the City of Penrith, located 42 kilometres west of the Sydney central business district in the Mulgoa State electorate and McMahon Federal division. The residential area of Erskine Park is located approximately 1 kilometre from the Project location (at the closest receiver point) and has a population of approximately 6,500 residents.



The Erskine Business Park was gazetted for industrial purposes under the Western Sydney Employment Area State Environmental Planning Policy (2009). Most development has taken place subsequent to 2009 and the area has grown to be an important regional logistics and distribution centre with strategic links to the M4 and M7 Motorways. The precinct covers approximately 721 ha, of which approximately 105 ha is vacant (as of 2021). The 99 businesses in residence employed 5,805 people (as of 2016). Of these jobs, 67% were industrial (including transport, warehousing, and manufacturing), 18% were in services, 8% were knowledge intensive, and 7% were in health and education (Penrith City Council, 2021).

2. Stakeholder Identification and Mapping

This SES has been designed to enable community members (especially those who may experience impacts) to be part of the Project planning and development process with the opportunity to ask questions and engage in a meaningful way. The following stakeholder groups have been identified as part of the SES, as identified in Table 2.1.

Table 2.1: Stakeholders

MCL7 Project Stakeholders	Specific Parties	Potential Interests / Concerns
Government		
Federal and State Members of Parliament NSW Ministers (and Shadows) Key agencies / departments Local Council (Penrith) Panels	Department of Planning and Environment, Member for Western Sydney, Member for Mulgoa, Member for McMahon, Environmental Protection Agency, Penrith City Council, Transport for NSW, Civil Aviation Safety Authority, emergency services departments.	Community wellbeing local employment Project updates product use / (domestic) distribution regulatory compliance environmental impact
Adjacent landowners		
Businesses / Organisations	13 commercial premises – EHI Australia, CBRE, Orafol Australia, Cleanaway, Digital Realty, Bevchain, Darley Aluminium Trading, Coles – retail ready operations, Goodman Fielder, Icehouse logistics, Regen Global, Samsung SDS and Scott's Refrigeration Logistics.	Individual consultation, access and impact to business, noise impacts, governance and ownership of the developing entity, construction traffic and environmental impact
Nearby landowners	-	
Businesses / Organisations	Erskine Park Business Park businesses and organisations (a further 13 commercial premises)	Access and impact to business, noise impacts, governance and ownership of the developing entity, construction traffic and environmental impact



Surrounding communities		
Erskine Park Kemps Creek St Clair	Community members who live outside of the Erskine Park Business Park (approximately 1km from the proposed Project location)	Community consultation, community wellbeing, economic benefits, governance and ownership of the developing entity, impacts of construction traffic and environmental impact
Educational Institutions		
Schools located within 1km of the proposed Project location	Emmaus Catholic College Mamre Anglican School Trinity Primary School	Property impacts, visual impacts, access changes, environmental changes, community benefits, governance and ownership of the developing entity and transport access impacts or changes
Media		
Local Metro	(Local) The Western Weekender, Penrith 9News, Penrith Press, The National Tribute (Metro) The Australian, The Australian Financial Review, Sydney Morning Herald, The Age, Herald Sun, Daily Telegraph, Courier Mail, ABC TV,	Community wellbeing, local employment, Project updates and product use / (domestic) distribution.
BlueScope stakeholders		
Internal stakeholders	WSSC employees WSSC Contractors Broader Australian Steel Products (ASP) workforce	Assessment process, community benefit, regional economic development, operational considerations (i.e. hours of operations and rostering)

3. Key Messages

The following messages aim to ensure a consistent and coordinated approach by the Project team when liaising with various stakeholder groups and will be used as the basis for public communication. An initial response or



'holding message' is recommended to acknowledge the submission of the scoping report and any community interest.

The key messages listed below are relevant for all stakeholder groups listed in Table 2.1.

Holding Message

- BlueScope is currently preparing a submission for the NSW Department of Planning and Environment to support development consent to construct a new metal coating line at its Western Sydney Service Centre, located at Erskine Park.
- As part of this process BlueScope is engaging with the local community including local businesses in the Erskine Park Business Park.
- The Project is proposed to be located adjacent to the existing paintline at the Western Sydney Service Centre site.
- The Project provides a growth opportunity for BlueScope's existing operations in Western Sydney to meet the strong demand of key building and construction building components, producing up to 240,000 tonnes of COLORBOND®, ZINCALUME® and TRUECORE® steel products.
- The Project is an estimated capital investment of \$250 million and will create approximately 300 jobs including 250 during construction and 45 full time permanent roles once operational.
- Maximum local participation by contractors and suppliers will continue throughout the life of the Project.
- The indicative timeframe for commissioning the Project is 2025 following a two-year construction period.
- The Project consultation is in its early stages and community members will be given the opportunity to be involved throughout the approval process. We will be conducting a range of studies to inform the Project, including environmental assessments, a social impact and economic assessment, and will continue to keep the community informed as we progress through this work.
- If you would like more information, please get in touch via our dedicated Project website at <u>www.bluescopewssc.com.au</u>

4. Engagement Matrix - sequence

Risk	Mitigation	Tools / Channels
Impacts of construction on the community: construction noise, dust and traffic impacts, poor worker behaviour or influx of works in the area.	Provide proactive updates to the community on upcoming construction work, its potential impacts and duration. Provide avenues for complaints and feedback. Seek to continually improve processes and show community where we have responded to their concerns.	Recommended: Project website, newsletters, targeted email, construction notices, complaints and feedback channels.
		Optional: Face to face visits, phone calls, information sessions, site tours and briefings.


Access to information: community members do not have access to adequate and accurate information on the Project to keep themselves informed on the progress and potential impacts to health, safety, and the local environment	Provide extensive, clear and easy-to-understand information across a range of readily accessible mediums.	Recommended: Project website, social media, fact sheets, media releases, newsletters, targeted mail and emails, information sessions, sponsorships and in person briefings. Optional: social media, site tours and workshops.
Environmental management: community members object to environmental aspects of the Project including GHG emissions	Provide extensive information on the environmental aspects of the Project and proposed management systems / mitigation measures.	Recommended: Project website, fact sheets, targeted email, newsletters, information sessions, complaints and feedback channels. Optional: site tours and briefings.
Approval process and timing: Delays with approval timelines for the Project	Ensure that Project teams provide accurate forecast of the timing for Project development and construction and update affected parties if any variations occur.	Recommended: Project website, fact sheets, newsletters, targeted mail and emails, complaints and feedback channels Optional: in person briefings and social media.
Visual amenity: community members object to the visual amenity	Early engagement with nearby businesses to provide open and honest information on the visual impact (being minimal or equivalent to the existing WSSC operations).	Recommended: Project website, fact sheets, targeted email, newsletters, information sessions, complaints and feedback channels. Optional: site tours and briefings.



5. General Communication

5.1 Media Strategy and Protocols

Local media will potentially have interest in the Project at different stages throughout the Project lifecycle. Media (including local and national interest) will be managed by BlueScope, and benefits will be highlighted through key messaging outlined in this SES.

5.2 Complaints Management and Recording

Complaints, feedback and enquiries can be made through an established dedicated phone number (to be commissioned during the 'Planning and approvals' phase of the Project), by email or through the website.

All public enquiries, feedback and complaints regarding the Project will be recorded and case managed in a central Customer Relations Management Database (CRMD). The CRMD will capture contact details and record information about the enquiry or complaint. Cases will be assigned in the CRMD to the staff responsible for responding and all responses, actions arising, and closure of enquiries and complaints will be recorded.

The CRMD will also be used to collect a contact database of community members and businesses that can be used for email and mail updates and direct communications to local schools or interest groups in the area. Response time for responding to enquiries and complaints are provided in Table 5.3.

Type of complaint	Response timeframe
Complaints concerning safety of worker behaviour	Within 24 hours
Other complaints	Within 2 business days
Enquiries and feedback	Within 2 business days

Table 5.3 Complaint Response Timeframes

6. Communication and Engagement Action Plan

BlueScope will continue to consult and engage with the local community and other stakeholders throughout the course of the Project, as outlined in Table 6.1.

International Association for Public Participation (IAP2) uses a spectrum of communications and engagement, ranging from low to high stakeholder impact on decision making (inform, consult, involve, collaborate, empower). This SES mostly sits in the 'inform' and 'consult' categories.

Appendix A of this SES explains the IAP2s Public Participation Spectrum in more detail.

A list of proposed collateral recommended for the planned activities above can be found in Appendix B of this SES.

Table 6.1 Communication and Engagement Action Plan

Project Phase	Objectives	Planned activities
Project feasibility	Finalise site selectionFormalise engagement processes	Establish Project website, 1800 number, dedicated email contact



In progress – Q2 2022	 Define relevant engagement processes Inform community about the Project Level of influence: inform 	 Gather phone numbers, addresses and emails Introductory phone calls Doorknocks for face-to-face briefings Development of Project overview flyer and briefing pack Targets all stakeholder groups
Planning and approvals Q2 2022 - 2023	 Provide ongoing communications and engagement Proactively seek feedback from the community to inform the Project construction activities / considerations Level of influence: inform, consult and engage 	 Face to face visits Phone calls Newsletters Updates on the Project website Information sessions and site tours <i>Targets all stakeholder groups</i>
Construction Planned for 2023	 Proactively keep community informed about the Project construction activities Actively address concerns by responding to complaints and enquiries in a timely manner Using community feedback, seek to minimise or avoid impacts Maximise the opportunities for community members and businesses within the Project Level of influence: inform and consult 	 Face to face visits Phone calls Complaints management processes Newsletters Updates on the Project website Site open day / tour Develop community partnerships Targets all stakeholders
Commissioning and operations Planned for mid-2025	 Intensive engagement as MCL7 commences operation Build ongoing trust and confidence with the community and neighbouring businesses Level of influence: inform, consult and involve 	 Face to face visits Site tours and briefings Complaints management processes Media releases Updates on the Project website Targets all stakeholders

7. Version Control

Version Control	Name and Position	Date	Signature
Author	Amber Waldron Manager Community and Government Relations	26 May 2022	
Endorsed by			
Approved by			



Appendix A: IAP2's Public Participation Spectrum

The IAP2 Federation has developed the Spectrum to help groups define the public's role in any public participation process. The IAP2 Spectrum is quickly becoming an international standard.

Table A.1 IAP2's Public Participation Spectrum

	Inform	Consult	Involve	Collaborate	Empower
Public Participation Goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and / or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
Promise to the Public	We will keep you informed	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.



Appendix B: Collateral

Table B.1 provides a list of recommended collateral that can be used to facilitate stakeholder and community engagement, to meet the needs of a diverse audience throughout the life of the Project.

Table B.1	Recommended	Collateral

Collateral type	Recommended collateral
Letters	Letter of introduction
	Letters to impacted residents (immediate neighbours and surrounding businesses)
	Invitations to community open days / site tours
Newsletters	Introductory newsletter
	Regular newsletter updates about the Project development and construction
Media releases	Major Project milestones
	Responses to any issues
Emails	Regular targeted emails outlining upcoming construction impacts
(Email database to be gathered	E-copies of newsletter and invites
Fact sheets / posters	Generic metal coating line fact sheet
	Project overview including architectural drawing of building
	Project environmental impacts and management techniques
	Approval process (NSW/ Government)
VVebsite	Project documentation
	News stories and videos of the Project in the community
	Construction undates
	Fact sheets
	Work with us
	Contact details
	Feedback and complaint contact details
Social media – LinkedIn,	Updates
Facebook, YouTube, Twitter	Good news stories
	Community photos
Podcasts	Project overview
	Process and product overview
	Meet and greet with WSSC employees
Workplace (Facebook for	Project overview
workplace)	Project updates
	Key contact details
	Internal Project communications



APPENDIX C ENGAGEMENT MATERIALS

Company	Boundary/Location	Notes/Feedback
Bevchain	Northern Boundary	 Contact made 17 May 2022 and no concerns raised to date. Interested in having a site briefing once the studies have been completed.
Bevchain (Kellet Cl)	700m East	 Conversation captured as per above contact.
Brandlink	200m North West	 TBC - Unable to get in contact.
CBRE	Southern Boundary	 Immediate neighbour to the proposed location. No concerns raised at this stage and expressed interest in being kept informed following the Scoping Report/SEARs. Briefing organised for 5 June 2022.
Cleanaway	Western Boundary	 Only concern raised was potential for the project to impact the aquifer. A site visit was organised on 10 May 2022.
CMC Coil Steels	320m North West	 Expressed interest in being kept informed via email as the project progresses.
Coles - Retail Ready Operations	South Eastern Boundary (Across Templar Road)	 No concerns raised at this stage. Expressed desire to holding a briefing after studies have been undertaken.
Coles - Retail Ready Operations	South Eastern Boundary (Across Templar Road)	 Same business as above. No further contact required.
Darley Aluminium Trading	Western Boundary	 Expressed interest in understanding the size and scale of the project as it progresses.
Darley Aluminium Trading	Western Boundary	 Same business as above. No further contact required.
DHL Warehouse [LSA]	200m South East	■ TBC – Unable to get in contact.
Digital Realty	Northern Boundary	 Contact made on 17 May 2022 with a security contact. An email was sent to the Business Manager on 17 May 2022. Briefing organised for 18 May 2022.
EHI Australia (CBRE Tenant)	Southern Boundary	 Briefing held on 17 May 2022.
EHI Australia (CBRE Tenant)	Southern Boundary	 Same business as above. No further contact required.
FedEx	80m North East	 TBC – Unable to get in contact.

BlueScope – MCL7 – Consultation Log – Neighbouring Plants



Company	Boundary/Location	Notes/Feedback
Goodman Fielder	Eastern Boundary (Across Templar Road)	 Got in touch on 17 May 2022 and was advised they would get us in contact with their legal team. Most interested in emissions and construction traffic associated with the project.
Icehouse logistics (CBRE Tenant)	100m from Southern Boundary	 No concerns raised at this stage. Would like to be kept informed as the process continues and once the studies have been undertaken for the EIS.
Independent Liquor Group	200m North West	Spoke with a member of the team who did not have any concerns with the project, however requested any further information be passed on to the general reception email.
Koorong Books	190m North West	No answer and no voicemail.
Midway Metals Sydney	594m North East	 Asked to try calling again when the Manager is back.
Murray Goulburn Co-operative Co / Suputo	485m South West	No answer and no voicemail.
Orafol Australia (CBRE Tenant)	Southern Boundary	 No concerns raised at this stage. Would like to be kept informed as the process continues and once the studies have been undertaken for the EIS.
Regen Global	100m from Southern Boundary	 No immediate concerns raised. The property is leased and they would like to notify the owners at an appropriate time. Communications to be sent through at a later stage.
Samsung SDS (CBRE Tenant)	Southern Boundary	 Asked to provide further information via email.
Scotts Refrigerated Logistics/RAND	South Eastern boundary (Across Templar Road)	 TBC – Tried calling on 17 May 2022. No voicemail available.
SCT Logistics	250m North West	■ TBC – Unable to get in contact.
Strandbags Distribution Centre	700m East	 TBC – Unable to get in contact.
WINC Australia Warehouse	850m East	 TBC – Unable to get in contact.
Keith Engineering	550m East	 TBC – Phoned and left message on 3 May 2022.



MCL7 Stakeholder Engagement – Project Briefings (meeting invites)

	Inviteor
This appointment occurs in the past.	invices
Aviation Safeguarding	Organiser
Tuesday 2 May 2022 from 10:45 am to 11:15 am	
30 minutes	1 Accepted
You accepted Edit RSVP	Required
Microsoft Teams Meeting	
i Join Teams Meeting	
None ~	

Stakeholder: Western Sydney Aerotropolis

• •	Western Sydney International Airport Experience Centre - Calendar - amber.waldron@bluescopesteel.com
Busy 🛱 Mark as Private 🗠 Reply	$ ightarrow$ Forward $\stackrel{\Rightarrow}{\leftarrow}$ Options
C ⁸ This appointment occurs in the past.	
99 Western Sydney Internatio	nal Airport Experience Centre
Tuesday, 10 May 2022 from 1:00 pm to 1 hour	2:00 pm
 Western Sydney International Airport Experier Join Teams Meeting 	ice Centre
Q None ~	
Veeting Details	
Microsoft Teams meeting Join on your computer or mobile app Click here to join the meeting	
Join with a video conferencing device	
teams@vc.bluescope.com	
Alternate VTC instructions	
Or call in (audio only)	
+1.816-406-3971,699348794# United States, #	lansas City
(833) 543-3672, 699348794# United States (Tol	I-free)
Phone Conference ID: 699 348 794#	
Find a local number Reset PIN	
Learn More Meeting options	

Stakeholder: Western Sydney Aerotropolis

Western Sydney Service Centre proposal • Calendar • amber.waldron@bluescopesteel.co	m
Busy 🖞 Mark as Private ← Reply → Forward 💝 Options …	
Q ^b This appointment occurs in the past.	Invitees
99 Western Sydney Service Centre proposal	Organiser
© Tuesday, 10 May 2022 from 11:30 am to 11:45 am 15 minutes	2 Accepted Rayner, Joel Required
S5 Templar Rd Western Syndey Service Centre	Williams, Heath Required
None Vesting Details O Meeting Insights (1)	1 Not Responded Required Required
Hi Constrained by the proposed expansion plans at our Western Sydney Service Centre. If you can meet me at the front of house area of the Centre we can then take a walk to proposed site to discuss the plans and work through any any shave. Many thanks, There There Waldron Manager Community and Government Relations BusScope Manager Community and Wednesday. Please note my work days are Monday, Tuesday and Wednesday.	

Stakeholder: Cleanaway

Placeholder - Meeting with Tanya Davles - Calendar - amber.waldron@bluescopesteel.com	
Busy	
Q ^N This appointment occurs in the past.	Invitees
99 Placeholder - Meeting with Tanya Davies	Organiser Waldron, Amber
 Thursday, 12 May 2022 from 10:30 am to 11:30 am 1 hour 	Required 2 Accepted Required Required
AU-NSW-PK-Sirius-C-Dirawong	AU-NSW-PK-Sirius-C-Dirawong
lĝi Join Teams Meeting	1 Not Responded
Q None ~	Reay, Michael R Required
Meeting Details 🛛 🖓 Meeting Insights (4)	
Join meeting More ways to join: Join from the meeting link https://nswph.webex.com/nswph/j.php?/MTID=me35750f398b9e30c95d8da71f5067b94	
Join by meeting number Meeting number (access code): 265 137 94996 Meeting password: QmDNWpp6313 (76369776 from phones)	
Tap to join from a mobile device (attendees only) <u>+61-2-9338-2221.265137/949667/63697/63</u> Australia Toll Some mobile devices may ask attendees to enter a numeric meeting password.	
Edit Event Cancel Meeting	

Stakeholder: Member for Mulgoa, Tanya Davies

TEAMS Penrith City Council & Blue Scope Steel re; Proposed Developments at the Western Sydney Service Centre, Erskine Park	• Calendar • amber.waldron@bluescopesteel.com
Busy 🖞 Mark as Private ← Reply → Forward 😴 Options …	
Ω^k This appointment occurs in the past.	Invitees
77 TEAMS Penrith City Council & Blue Scope Steel re; Proposed Developments at the Western Sydney Service Centre, Erskine Park	Organiser E E Executive Office Required
Monday, 16 May 2022 from 3:30 pm to 4:00 pm 30 minutes	1 Accepted Waldron, Amber Required
G You accepted Edit RSVP	4 Not Responded
Microsoft Teams Meeting Join Teams Meeting	Repared Repared Staff, Wayne WR
Q None ~	Reay, Michael R Required
Download All • Preview All	
Meeting Details Q Meeting Insights (2)	
Meeting between Penrith City Council and Blue Scope Steel regarding proposed developments at the Western Sydney Service Centre, Erskine Park. Invitees Son, Director – Development and Regulatory Compliance (Penrith City Council) Development Services Manager (Penrith City Council)	
wayne start, wanager wanutacturing towe scope steen) Michael Reay, Head of Corporate Affairs (Blue Scope Steel) Amber Waldron, Manager Community and Government Relations (Blue Scope Steel)	
If there is pre-reading available prior to this meeting, Amber has advised she will distribute it to those listed above.	
Kristy Johnson Executive Assistant	
E seletu lohuennitteusnitte nitu	
Delete Meeting	

Stakeholder: Penrith City Council

Invitees Organiser Weight Waldron, Amber Required 3 Accepted a Required a Required b Req
Invites Organiser Waldron, Amber Regund 3 Accepted Rayner, Joel Prequired Williams, Heath Reguired
Organiser Waldron, Amber Regurde 3 Accepted Regure Regure Williams, Heath Regured
3 Accepted a Required Required W Williams, Heath Required
Williams, Heath Required

Stakeholder: EHI

☐ ○ BlueScope Western Sydney Service Centre development proposal - Calendar - amber.waldron@blu	escopesteel.com
🛢 Busy 🖞 Mark as Private 🕤 Reply 🄿 Forward 😴 Options …	
C ¹ This appointment occurs in the past.	Invitees
99 BlueScope Western Sydney Service Centre development proposal	Organiser Maldron, Amber
 Wednesday, 18 May 2022 from 1:30 pm to 2:00 pm 30 minutes 	4 Accepted () @digitalrealty.com
Western Centre Service Centre, Templar Road, Erskine Park Join Teams Moeting	Williams, Heath Required Rayner, Joel Resulted
Q None ~	PT Paul Theodore Optional
Meeting Details	
It was great to talk with you just now regarding our Western Sydney Service Centre (WSSC) operations. As discussed, I've locked in this time for you to meet with the BlueScope team including Heath Williams, Joel Rayner and myself regarding the proposed expansion plans at WSSC. The Teams link is provided below for you to share with your Director.	
If you can meet Heath and Joei at the front of house area of the Centre at 1.30pm that would be greatly appreciated. You are more than welcome to take a walk to proposed site to discuss the plans and work through any questions you may have after the briefing.	
Many thanks,	
Amber	
Amber Waldron Manager Community and Government	
Edit Event Cancel Meeting	

Stakeholder: Digital Reality

BlueScope MCL7 briefing with CBRE • Calendar • an	nber.waldron@bluescopesteel.com
Busy 📩 Mark as Private ← Reply → Forward 😴 Options …	
99 BlueScope MCL7 briefing with CBRE	Invitees
 Friday, 10 June 2022 from 10:30 am to 11:00 am 30 minutes 	Waldron, Amber Required
[55 Templar Road, Erskine Park (BlueScope Western Sydney Service Centre)	R) Rayner, Joel Required Williams, Heath
 Join Teams Meeting 15 minutes before ~ 	Required
Veeting Details	
HI	h Williams and Joel Rayner
HI It was great to talk with you just now. As discussed, I've locked a 30-minute window of time for you to meet with Heatl regarding the proposed expansion plans at our Western Sydney Service Centre. If you and your colleagues can come to the front of house (reception area) of the Centre, the team will then take you ti well as a walk to proposed site to discuss the plans and work through any questions you may have. Many thanks, Amber	h Williams and Joel Rayner hrough the project briefing as
HI	h Williams and Joel Rayner hrough the project briefing as
Hi	h Williams and Joel Rayner hrough the project briefing as
Hi	h Williams and Joel Rayner hrough the project briefing as
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Hi Constraints of the proposed expansion plans at our Western Sydney Service Centre. If you and your colleagues can come to the front of house (reception area) of the Centre, the team will then take you ti well as a walk to proposed site to discuss the plans and work through any questions you may have. Many thanks, Amber Microsoft Teams meeting Join on your computer or mobile app Click here to join the meeting Join with a video conferencing device teams@vc.buescope.com Video Conference ID: 116 595 766 0 Alternate VIC instructions.	h Williams and Joel Rayner hrough the project briefing as
Hi Constraints of the proposed expansion plans at our Western Sydney Service Centre. If you and your colleagues can come to the front of house (reception area) of the Centre, the team will then take you the add is a walk to proposed site to discuss the plans and work through any questions you may have. Many thanks, Amber Microsoft Teams meeting Join on your computer or mobile app Click here to join the meeting Join with a video conferencing device teams@w.bluescope.com Video Conference ID: 116 595 766 0 Alternate VIC instructions	h Williams and Joel Rayner hrough the project briefing as

Stakeholder: CBRE

• • •	MCL7 Line - Project Update - Calendar - amber.waldron@bluescopesteel.com	
BI	isy 🖞 Mark as Private 🦴 Reply → Forward 💝 Options …	
D4	This appointment occurs in the past.	Invitees
99	MCL7 Line - Project Update	Organiser Sammut, Cherie L
٩	Tuesday, 24 May 2022 from 1:30 pm to 2:00 pm 30 minutes	5 Accepted Waldron, Amber
6	You accepted Edit RSVP	GN
0	Mellor Centre - Flame Tree Conf Room - 28 People	CK 38
Q Meet	None v ting Details Q Meeting Insights (2)	1 Declined Mellor Centre - Flame Tree Corf Room - 28 Pe
Hi, Can We The This Reg	we please meet- either at the Mellor Centre or on Microsoft Teams. (I will be at the Mellor Centre). would like to discuss the Metal Coating Line 7 (MCL7) project that is planned for Erskine Park at the current CPL8 Western Sydney Paintline site. Scoping Report Is on track for submission on 30° May. will only be 20-30minutes and is basically just an information session with an opportunity for discussion and any questions. ards,	Required Not Responded Porteous, Natasha Required
E	Cherie Sammut Senior Environment Advisor - Slabmaking & MCL7 Australian Steel Products	
De	elete Meeting	

Stakeholder: EPA

APPENDIX D OFFENSIVE INDUSTRY DEVELOPMENT MEMORANDUM



Level 15 309 Kent Street Sydney NSW 2000 Locked Bag 3012 Australia Square NSW 1215

www.erm.com

Resilience and Hazards SEPP Offensive Industry Development - Memorandum



То	BlueScope Mr Robert Parisi, Capital Portfolio and Governance Manager, Australian Steel Products	
From	ERM	
Date	18 March 2022	
Reference	0628175	
Subject	Resilience and Hazards SEPP Offensive Development Memo – Erskine Park	

Dear Robert,

The following memorandum (memo) provides an assessment of the Metal Coating Line 7 (MCL7) Project located at Erskine Park, to determine the potential for the Project to be classified as an offensive or potentially offensive development under *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP), and ultimately to determine the permissibility of the Project if deemed as potentially offensive industry. It is noted that as of 1 March 2022, the provisions of the former *State Environmental Planning Policy No. 33* (SEPP 33) were transferred to Chapter 3 of the Resilience and Hazards SEPP. This memo has been prepared to support the overarching Hazardous and Offensive Industry Development Screening Assessment for the Project.

The hazardous and/or potentially hazardous industry has been addressed within a stand-alone assessment completed by Arriscar in March 2022 (*Hazard Assessment of Proposed BlueScope Steel Metal Coating Line at Erskine Park, NSW*). Any details of the Hazard Assessment have not been outlined within this memo, however, the conclusion/s from the Hazard Assessment have been noted in **Section 5** of this Memo. It is therefore recommended that the Hazard Assessment (Arriscar, 2022) be read in conjunction with this memo.

1. EXISTING ENVIRONMENT

The proposed Project will be located within the existing Bluescope Western Sydney Service Centre (WSSC) in Erskine Park, NSW, immediately south of the existing coil paint line to the north (CPL8) currently operated by BlueScope. The Project site and area surrounding the WSSC is zoned as IN1 General Industrial pursuant to the provisions of *State Environmental Planning Policy (Industry and Employment) 2021* (Industry and Employment SEPP). It is noted that as of 1 March 2022, the provisions of the former *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP) were transferred to Chapter 2 of the Industry and Employment SEPP.

The nearest sensitive receptors are approximately 780 metres to the north of the Project site and are identified as residential.

2. OFFENSIVE DEVELOPMENT OVERVIEW

Chapter 3 of the Resilience and Hazards SEPP applies to all industries that are considered to be potentially hazardous industry or potentially offensive industry. Chapter 3 aims to ensure that industrial proposals only proceed if they are suitably located and are able to demonstrate that they can be built and operated with an appropriate level of safety. 'Potentially offensive industry' and 'offensive industry' are defined under Section 3.2 of the Resilience and Hazards SEPP as follows:

- **potentially offensive industry** means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely or on the existing or likely future development on other significant adverse impact in the locality or on the existing or likely future development.
- offensive industry means a development for the purposes of an industry which, when the development is in operation and when all measures proposed to reduce or minimise its impact on the locality have been employed (including, for example, measures to isolate the development from existing or likely future development on other land in the locality), would emit a polluting discharge (including, for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land in the locality.

Before a proposal can be identified as offensive industry, it must first be identified as being potentially offensive industry and subject to the assessment and exhibition requirements of the Resilience and Hazards SEPP. The assessment should demonstrate that the offence can be controlled to a level which is not significant. The key consideration is for DPE (as the consent authority) to be satisfied that there are adequate safeguards to ensure emissions from a facility can be controlled to a level at which they are not significant.

The level of offence would not typically be considered to be significant if a licensing authority (e.g. NSW EPA) is willing to issue a pollution control licence or permit. If the proposal does not require such a licence or permit, the SEPP 33 Guidelines encourages DPE to use its judgement as to whether the level of offence can be controlled to a level which is not significant. If it is considered that the licence requirements can be met, then the proposal is not likely to be 'offensive industry' and in most cases, compliance with DPE requirements is sufficient to demonstrate that a proposal is not an offensive industry.

2.1 Assessment of Potentially Offensive Development

The former Department of Industry *Applying SEPP 33 Guidelines* (DoP, 2011) recommends that the following be considered when assessing whether a development is potentially offensive:

- Does the proposal require a licence under any pollution control legislation administered by the EPA? If so, the proposal should be considered potentially offensive;
- Does the proposal require any pollution control approval pursuant to any legislation or by law administered by the Council?; and



If a pollution control licence or approval is not required, does the proposal cause offence having regards to the sensitivity of the receiving environment?

If the Department of Planning and Environment (DPE) considers that the level of offence will not be significant after considering these matters, then the proposal should not be refused for reasons due to offence.

The proposed MCL would be defined as a "Scheduled Activity" under Schedule 1, Clause 26 of the *Protection of the Environment Operations Act 1997* (POEO Act) as the proposed MCL would be developed with capacity to process more than 10,000 tonnes of metal per year. An Environment Protection Licence (EPL) is required for premises at which scheduled activities are carried on.

The Project would require an EPL and would therefore be considered as a 'potentially offensive development'. However, the Applying SEPP 33 Guidelines also state that if an EPL can be obtained for a development, and the requirements of the EPL can be met, the development is not considered to be an 'offensive industry' and would be permissible under the Resilience and Hazards SEPP.

Usually, the scope of matters likely to be regulated by an EPL for a development of this nature would include air quality and odour, and noise, among other environmental components that may emit a polluting discharge. An EPL of this nature would be consistent with the EPL currently in place for the existing CPL8 operations within the WSSC.

In order to understand the potential for Project-related air and noise to emit a polluting discharge in line with the definition of offensive and/or potentially offensive industry above, qualitative assessments for air quality and noise, respectively, have been undertaken to support this memo. The results of these qualitative assessments are summarised below.



3. AIR QUALITY

A qualitative air quality memo has been prepared to understand the potential air quality constraints in relation to offensive development at MCL7. The assessment is summarised below and included in this memo as *Attachment A*.

The qualitative air quality memo has been prepared to contextualise the potential risk of the Project to constitute 'offensive industry' with regard to routine air emissions, and corresponding ambient air quality considerations. The qualitative air quality memo has considered air emission profiles for the WSSC and surrounding industry, as well as changes in the profile associated with the introduction of MCL7 at the Site, and has identified the following:

- There are three facilities within 2 km of the WSSC that have National Pollutant Inventory (NPI) reported emissions, including oxides of nitrogen (NO_x) and volatile organic compounds (VOCs). Existing emissions of NOx and VOC from these facilities are lower than from the existing WSSC, but are of a similar scale.
- It has been identified that there are three existing stack sources at the WSSC and a further three proposed stack sources as part of MCL7. When adding MCL7 to the WSSC, point source NOx and VOC emissions were estimated to increase by 3% and 79% (respectively), which whilst representing an increase in emissions, is not considered a significant change in overall emission profile for the Site.
- A review of local background ambient air quality data indicates that annual average and maximum 1-hour nitrogen dioxide (NO2) concentrations are below both the NSW EPA impact assessment criteria and National Environment Protection Measures Ambient Air Quality (NEPM AAQ) standards.
- An Air Quality Impact Assessment (AQIA) will be required to support the EIS in order to demonstrate compliance with ambient air quality criteria that are applied in NSW as being protective of adverse air quality impacts. The consistency of the AQIA with operational emissions is assessed through development and monitoring against corresponding licence conditions.

Based on this review, as WSSC already carries licenced emission sources with a similar air emission profile, and that the impact assessment and operational monitoring processes will collectively be used to mitigate the potential impact of air emissions, it is not considered that the proposal would be consistent with the definition of 'offensive industry' as outlined in the Standard Instrument. As such, the Project is likely to be classified as 'potentially offensive industry' and permissible pursuant to the provisions of the Resilience and Hazards SEPP.



4. NOISE AND VIBRATION

A qualitative noise and vibration assessment has been prepared to understand the potential noise and vibration constraints in relation to offensive development at MCL7. The assessment is summarised below and included in this memo as *Attachment B*.

Section 2.8 of the BlueScope Steel Paintline & Service Centre modified Conditions of Approval (DA-206-8-2004-i MOD 6) outlines noise limits which are considered applicable for the purposes of understanding any offensive and/or potentially offensive characteristics associated with the MCL7 Project. The noise limits are reproduced in **Table 1** below.

Time of day	Descriptor	Acoustic quality objectives (measured at the receptor)
Day, Evening and Night	LAeq,15min	≤35 dBA
Night	LA1,1min or LA max	≤54 dBA

Table 1: CPL8 Noise Limits (DA-206-8-2004-i MOD 6)

The nearest sensitive receptor is approximately 780 metres from the boundary of the BlueScope site, and 900 metres from the MCL building. Based on this distance, the predicted noise levels at the nearest residential community are presented in **Table 2**. Predictions are noted to be conservative and based on the operation of MCL7, compliance is predicted to be achieved.

Table 2: Predicted Noise Levels (MCL7)

Descriptor	Predicted level at nearest receptor	
LAeq,15min	≤29 dBA	
LA1,1min	≤39 dBA	

4.1 Traffic Noise

The proposed MCL7 is predicted to result in an additional 49 inbound truck movements per week, and 103 outbound truck movements per week, as compared to the current traffic flows. Assuming truck movements are uniformly distributed during the day, the increase is the equivalent of less than one additional truck movement per hour, which will result in a negligible increase to traffic noise levels.

4.2 Noise Summary

Based on the conservative assumption of this assessment, the Project is not considered an offensive industry in terms of noise pollution at residential receptors. Compliance is predicted for the proposed operations of MCL7.

The Project will not have a significant adverse impact in the locality, or on the existing or likely future development on other land in the locality, and as such does not result in a significant level of offence.

5. CONCLUSION

Based on the results of the qualitative air quality and noise assessments, it is expected that the Project would not be deemed as an 'offensive' industrial development, but is likely to be deemed as a 'potentially offensive' development in line with the Resilience and Hazards SEPP. The inclusion of the MCL7 development is also unlikely to contribute to significantly increase cumulative impacts on the existing CPL8 and surrounding industrial developments.

Following the outcomes of the Hazardous and Offensive Industry Screening Assessment, it would be reasonable to conclude that, following a Preliminary Hazard Assessment (PHA) prepared to support the DA for the Project, the proposed Project could be deemed as 'potentially hazardous and/or offensive industry'.

Therefore, in light of the prohibition of 'hazardous and/or offensive industry' within the IN1 General Industrial zoning pursuant to the provisions of the Industry and Employment SEPP, the proposed Project could be deemed as 'potentially hazardous and/or offensive industry', resulting in the permissibility of the Project within the IN1 General Industrial zoning.

Should you require any further information, please contact the undersigned.

Hompil She

Danyil Skora Principal Consultant



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Attachment A – Qualitative Air Quality Assessment





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BlueScope Steel Limited

3 March 2022

ERM Reference: 0628175

Subject: BlueScope Steel Offensive Industry – Air Quality Memo

1. INTRODUCTION

ERM Australia Pty Ltd (ERM) has been engaged by BlueScope Steel Limited ('BlueScope') to prepare an air emission review to support the consideration of establishment of a Metal Coating Line (MCL7) at its existing Western Sydney Service Centre (WSSC) located at 55 Templar Road, Erskine Park, NSW (the Site). The objective of this work is to contextualise the potential risk of the Project to constitute 'offensive industry' with regard to routine air emissions, and corresponding ambient air quality considerations.

Offensive industry is defined in the former *State Environmental Planning Policy No.* 33 – *Hazardous and Offensive Development* (SEPP 33) ('the Standard Instrument') as per the following:

'Offensive industry means a building or place used to carry out an industrial activity that would, when carried out and when all measures proposed to reduce or minimise its impact on the locality have been employed (including, for example, measures to isolate the activity from existing or likely future development on other land in the locality), emit a polluting discharge (including, for example, noise) in a manner that would have a significant adverse impact in the locality or on existing or likely future development on other land in the locality.'

Accordingly, this review has included the following:

- A review and comparison of existing emissions from the WSCC and nearby industry.
- A review and comparison of existing and future WSCC emissions (i.e. inclusive of MCL7).
- Commentary on the process of air quality impact assessment and licencing in the avoidance of adverse impacts in the locality.
- A summary of key findings and relevant conclusions.

2. EXISTING AND SURROUNDING INDUSTRY

ERM has undertaken a brief review of emissions from the existing WSSC operations and other facilities in close proximity. The following sections provide National Pollutant Inventory (NPI) reported substances and emissions (in kg per reporting year). Section 3 provides further information on emissions for existing and proposed BlueScope operations.



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2.1 BlueScope WSCC

The existing operations at the WSSC include Coil Paint Line operations (CPL8). Emissions from the operations are vented via three point sources (stacks). Table 2.1 presents the NPI reported substances and emissions (in kg) for 2019/2020 for the WSSC operations. The key pollutants of focus for this review have been nominated as oxides of nitrogen (NO_x) and volatile organic compounds (VOCs), as they are considered useful in qualifying prospective changes to the WSSC emission profile with introduction of MCL7.

Substance	Air total (kg)	Air fugitive	Air point
Acetone	460	-	460
Arsenic & compounds	0	-	0
Beryllium & compounds	0.13	-	0.13
Cadmium & compounds	1.2	-	1.2
Carbon monoxide (CO)	5700	-	5700
Chromium (III) compounds	2.9	-	2.9
Chromium (VI) compounds	0.22	-	0.22
Copper & compounds	1.4	-	1.4
Cumene (1-methylethylbenzene)	180	-	180
Fluoride compounds	210	-	210
Hydrochloric acid	520	-	520
Lead and compounds	4.2	-	4.2
Mercury and compounds	0	-	0
Methyl isobutyl ketone	570	-	570
Nickel & compounds	1.1	-	1.1
Oxides of nitrogen (NO _x)	6400	-	6400
Particulate matter (PM ₁₀)	3300	-	3300
Particulate matter (PM _{2.5})	410	-	410
Polychlorinated dioxins and furans (TEQ)	5.20 x 10 ⁻⁰⁷	-	5.20 x 10 ⁻⁰⁷
PAhs (B[a]Peq)	0.05	-	0.05
Sulfur dioxide (SO ₂)	63	-	63
VOCs	8400	-	8400
Xylenes (individual or mixed	1200	-	1200

Table 2.1: WSSC NPI reported substances and emissions- 2019/2020 (kg)

Note: key pollutants for this review are shown in *bold italic* font. Source: NPI, 2021a

2.2 Surrounding industry

The WSSC is located in western Sydney in a predominately industrial area. To the north of the WSSC is Darley Aluminium Trading P/L which is an aluminium supplier and Bevchain warehouse. To the east of the WSSC is Goodman Fielder - a food products supplier, Scotts Refrigerated logistics – a transportation service and Orrcon Steel Sydney – a steel distributor. To the south of the WSSC is EHI Australia - an industrial equipment supplier, and ORAFOL

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Australia - a distribution service. To the west of the WSSC is the Enviroguard Erskine Park Landfill.

A search of the NPI website has shown that there are three facilities within 2 km of the WSSC that reach activity thresholds for reporting of emissions under the NPI, and these are provided in Table 2.2 below. Details for the reported substances and emissions are provided in the following sections. Figure 2.1 shows the locations of these facilities relative to the WSCC.

Table 2.2: Industry within 2 km of WSSC with	h NPI reported substances and emissions
--	---

Name	Address	Industry type	Distance and bearing from the WSSC
Goodman Field Consumer Foods	16 Templar Road, Erskine Park	Other food product manufacturing (119)	~200 m (north east)
Enviroguard Erskine Park Landfill	50 Quarry Road, Erskine Park	Waste treatment, disposal and remediation services (292)	~1 km (west)
Saputo Dairy Australia	111-113 Quarry Road, Erskine Park	Dairy Product Manufacturing (113)	~1.5 km (west)



Source: Google Earth Pro

Figure 2.1:Location of NPI reporting facilities near to the WSSC

2.2.1 Comparison and summary

The reported NOx and total VOC emissions have been compared for each of the three surrounding facilities and WSSC and are presented in Table 2.3 and Table 2.4, whilst Figure 2.2 and Figure 2.3 provide a visual representation of these data. It is noted that the existing WSSC has higher NOx and total VOC emissions than the other facilities.

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Table 2.3: Comparison of NPI reported VOC emissions - 2019/2020

Sito	Total VOCs (kg)			
Sile	Air total	Air fugitive	Air point	
Goodman Fielder Consumer Foods	140	40	100	
Enviroguard Erskine Park Landfill	880	-	880	
Saputo Dairy Australia	61	-	61	
BlueScope WSSC	8,400	-	8,400	



Figure 2.2: Comparison of NPI reported VOC emissions - 2019/2020

Table 2.4: Comparison of NPI reported NO_x emissions - 2019/2020

Site	NO _x (kg)			
Site	Air total	Air fugitive	Air point	
Goodman Fielder Consumer Foods	1,800	19	1,781	
Enviroguard Erskine Park Landfill	1,600	230	1,370	
Saputo Dairy Australia	320	-	320	
BlueScope WSSC	6,400	-	6,400	



Figure 2.3: Comparison of NPI reported NO_x emissions - 2019/2020

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3. EXISTING AND PROPOSED WSCC OPERATIONS

This section provides general context on emission sources for the existing and proposed BlueScope operations at WSSC.

3.1 Existing operations

As mentioned in Section 2, WSSC operations currently include a Coil Paint Line (CPL8). There are three existing point sources (stacks) at the WSSC. The EPA identifiers (IDs) for these stacks are as follows:

- EPA ID #1 Chemical Coater Drier and Coater Room Stack
- EPA ID #2 Oven Exhaust (RTO) Stack
- EPA ID #3 Air Quench Exhaust Stack

Table 3.1 presents the existing stack parameters and emission characteristics for each stack as derived from emission monitoring data.

Parameter	EPA ID#1	EPA ID#2	EPA ID#3	Units	
Stack locations	295 793, 6255 675	295 791, 6255 681	295 772, 6255 690	MGA94	
Stack height	30	30	30	m	
Stack diameter	1.92	2.22	1.82	m	
Temperature*	42	241	33	°C	
Velocity*	15	11	9	m/s	
Flow*	21	15	13	Nm³/s (dry)	
Concentration*					
VOC as n-propane	8.0	1.5	2.4		
NO _x as NO ₂	-	21.3	-	mg/Nm ³	
Estimated Emission	rate*	1	·		
VOC as n-propane	5,298	710	984		
NO _x as NO ₂	-	10,076	-	kg/yr	

Table 3.1: Existing stack parameters for the WSSC

Source: BlueScope Steel Limited, 2021a,b. Note: *Average value from testing data.

3.2 **Proposed operations**

MCL7 is being considered for location to the south of BlueScope's existing WSSC. The proposed operations will include three point sources. Table 3.2 presents the proposed stack parameters.

Parameter	Heating Furnace	Passivation Drying Oven	Resin Curing Oven	Units
Stack locations	295 777, 6255 601	295 833, 6255 580	295 852, 6255 581	MGA94
Stack height	39.2	31.1	31.1	m
Stack diameter	2.5	0.6	0.3	m
Temperature	473	119	354	°C

Table 3.2: Indicative stack parameters for MCL7

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Parameter	Heating Furnace	Passivation Drying Oven	Resin Curing Oven	Units
Velocity	7	15	17	m/s
Flow	5.1	2.5	2.8	Nm³/s
Concentration*				
VOC as n-propane	0.6	0.6	1.1	ing at /N log 3
NO _x as NO ₂	39	22	-	mg/inm ³
Estimated Emission rate*				
VOC as n-propane	97	47	94	1
NO _x as NO ₂	6,273	1,734	-	кg/yr

Source: BlueScope Steel Limited (2021a). *Average value from testing data.

3.3 Summary

Table 3.3 provides a summary of existing WSSC and MCL7 NO_x and VOC emissions, as based on averages of emission monitoring and flow data. Also shown is the total including MCL7, and the percentage increase that introduction of MCL7 would represent over the existing WSSC emissions.

Table 3.3: Summary of existing WSSC and MCL7 NO_x and VOC emissions

Substance	Existing	MCL7 Estimate	Total	% Increase with addition of MCL7
VOC	6,992	241	7232	3%
NOx	10,076	8,007	18,083	79%

Figure 3.1 shows a summary of these estimated quantities as a sum of the existing (blue shading) and proposed MCL7 (orange shading).





As shown in Table 3.3 and Figure 3.1, the introduction of MCL7 at the WSSC would result in an increase in VOC of NOx emissions, however the magnitude of this change is not considered to constitute a material change to the existing emission profile for the Site.

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4. BACKGROUND AIR QUALITY

The NSW Department of Planning and Environment (DPE) operate two air quality monitoring stations (AQMS) in the local area of Erskine Park. Table 4.1 presents a summary of the nearby AQMS locations, with proximity to Erskine Park.

Monitoring data from 2017 to 2021 has been summarised in the following sections. For the purposes of this assessment the key pollutant for background concentrations is nitrogen dioxide (NO₂).

AQMS location	Easting (kmE, MGA94)	Northing (kmE, MGA94)	Distance and bearing from the WSSC
St Marys	293 170	6258 083	3.5 km north west
Prospect	306 745	6258 645	11.5 km north east

Table 4.1: Summary of nearby AQMS with proximity to Erskine Park

4.1 Nitrogen dioxide (NO₂)

NO₂ concentrations have been measured at both DPE AQMS locations mentioned in Table 4.1. Figure 4.1 and Figure 4.2 present annual average NO₂ concentrations and maximum 1-hour average NO₂ concentrations, respectively, for the last five years from 2017 to 2021. Measured concentrations at all sites are within the NSW EPA impact assessment annual average criterion of 62 μ g/m³ and below the NEPM AAQ standards of 31 μ g/m³, as shown in Figure 4.1. The maximum 1-hour average concentrations are also well below the NSW EPA impact assessment criterion of 246 μ g/m³ and below the NEPM AAQ standard of 164 μ g/m³, as shown in Figure 4.2.

The figures show that higher NO₂ concentrations are recorded at Prospect compared with St Marys. There is no clear trend for St Marys; however, for Prospect it can be seen that both annual averages and maximum 1-hour average NO₂ concentrations have been reducing year on year since 2017.

There are no recorded background concentrations for total VOCs. It is noted that VOCs are assessed on an incremental basis, in the absence of background.



Figure 4.1: Annual average NO₂ concentrations measured at DPE St Marys and DPE Prospect from 2017 to 2021

Figure 4.2: Maximum 1-hour average NO₂ concentrations measured at DPE St Marys and DPE Prospect from 2017 to 2021

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5. AIR QUALITY MANAGEMENT

Air emissions from the existing and proposed operations at WSSC would be assessed within an Air Quality Impact Assessment (AQIA) that is conducted in accordance with *The Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA, 2017). The AQIA will be required to demonstrate compliance with ambient air quality criteria that are applied in NSW as being protective of adverse air quality impacts. Where compliance is not demonstrated, the proponent is required to review emission control measures, and subsequently demonstrate that compliance is achieved.

Air emission limits developed within the AQIA are commonly carried into the Environment Protection Licence (EPL) for the site, to ensure that adverse air quality impacts are not generated during the operational phase. In this respect, the proposal would not be consistent with the definition of 'offensive industry' as outlined in Section 1.

6. SUMMARY

This review has considered air emission profiles for the WSSC and surrounding industry, as well as changes in the profile associated with the potential introduction of MCL7 at the Site and has identified the following:

- There are three facilities within 2 km of the WSSC that have NPI reported emissions, including NO_x and VOCs. Existing emissions of NOx and VOC from these facilities are lower than from the existing WSSC, but are of a similar scale.
- It has been identified that there are three existing stack sources at the WSSC and a further three proposed stack sources as part of MCL7. When adding MCL7 to the WSSC, point source NOx and VOC emissions were estimated to increase by 3% and 79% (respectively), which whilst representing an increase in emissions, is not considered a significant change in overall emission profile for the Site.
- A review of local background ambient air quality data indicates that annual average and maximum 1-hour NO₂ concentrations are below both the NSW EPA impact assessment criteria and NEPM AAQ standards.
- The air quality impact assessment would be required to demonstrate compliance with ambient air quality criteria that are applied in NSW as being protective of adverse air quality impacts. The consistency of the AQIA with operational emissions is assessed through development and monitoring against corresponding licence conditions.

Based on this review, as WSSC already carries licenced emission sources with a similar air emission profile, and that the impact assessment and operational monitoring processes will collectively be used to mitigate the potential impact of air emissions, it is not considered that the proposal would be consistent with the definition of 'offensive industry' as outlined in the Standard Instrument.

We hope that this review addresses your requirements. Please do not hesitate to contact the undersigned, should you have any queries.

Yours sincerely,

Karie Bradfield ERM Lead Partner Russ Francis Senior Consultant – Air Quality

7. LIMITATIONS

- This report is based solely on the scope of work described in email proposal to BlueScope (dated 14 February 2022) performed by Environmental Resources Management Australia Pacific Pty Ltd (ERM) for BlueScope Steel Limited (the Client). The Scope of Work was governed by a contract between ERM and the Client (Contract).
- 2. No limitation, qualification or caveat set out below is intended to derogate from the rights and obligations of ERM and the Client under the Contract.
- 3. The findings of this report are solely based on, and the information provided in this report is strictly limited to that required by, the Scope of Work. Except to the extent stated otherwise, in preparing this report ERM has not considered any question, nor provides any information, beyond that required by the Scope of Work.
- 4. This report was prepared between February 2022 and March 2022 and is based on conditions encountered and information reviewed at the time of preparation. The report does not, and cannot, take into account changes in law, factual circumstances, applicable regulatory instruments or any other future matter. ERM does not, and will not, provide any on-going advice on the impact of any future matters unless it has agreed with the Client to amend the Scope of Work or has entered into a new engagement to provide a further report.
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- 7. Only the environmental conditions and or potential contaminants specifically referred to in this report have been considered. To the extent permitted by law and except as is specifically stated in this report, ERM makes no warranty or representation about:
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 - c. has not been prepared nor is intended for the purpose of advertising, sales, promoting or endorsing any Client interests including raising investment capital, recommending investment decisions, or other publicity purposes;
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 - e. does not purport to provide, nor should be construed as, legal advice.

8. **REFERENCES**

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Attachment B – Qualitative Noise and Vibration Assessment

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SEPP 33 Offensive Development Screening Assessment - Noise & Vibration

То	BlueScope Mr Robert Parisi, Capital Portfolio and Governance Manager, Australian Steel Products
From	ERM
Date	18 March 2022
Reference	0628175 BSL Offensive Development Noise Memo
Subject	SEPP 33 Offensive Development Memo

This qualitative noise and vibration assessment has been prepared to understand the potential noise and vibration constraints in relation to offensive development at MCL7.

This memorandum presents a qualitative noise and vibration assessment to understand the potential noise and vibration constraints in relation to offensive development at MCL7. The assessment also provides recommendations for mitigation measures, where necessary.

The assessment is based on information provided by BSL including the following drawings, and applicable noise standards and guidelines:

- MCL7 Project BSL RFI Response, BlueScope, dated 11 February 2022;
- Western Sydney Service Centre Paint Line Noise Compliance Monitoring 2021, SLR Consulting, March 2021;
- Determination of Development DA-206-8-2004-I (MOD 6),12 September 2017; and
- Protection of the Environment Operations Act (POEO Act) 1997.

1. SITE INFORMATION

The proposed MCL7 is located within the existing BlueScope site at 25-55 Templar Road, Erskine Park, NSW. The facility is surrounded by other industrial developments. The nearest sensitive receptors are 780 metres to the north of the site and are identified as residential. MCL7 and the nearest sensitive receptors are shown in Figure 1.2.
ERM

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Figure 1.1: Site location and surrounding area (Drawing Ref.: SLR Report)

2. ASSESSMENT METHOD

This section summarises the assessment criteria, prediction method and assumptions used to assess the potential noise impact of the proposed MCL7.

2.1 Assessment Criteria

Section 2.8 of the Determination of the DA outlines noise limits applicable to the development, as reproduced in **Table 2.1**.

Time of day	Descriptor	Acoustic quality objectives (measured at the receptor)		
All	LAeq,15min	≤35 dBA		
Night	LA1,1min	≤54 dBA		

Table 2.1: Determination of DA noise limits

2.2 Assumed Source Noise Levels

A reverberant sound pressure level of 85 dBA L_{eq} is expected within the MCL facility to meet the SafeWork Code of Practice under section 274 of the Work Health and Safety Act (the WHS Act). For this assessment, based on ERM's experience at similar facilities, the L_{A1} parameter has been assumed to be no greater than 10 dB higher than the L_{Aeq} level, resulting into a maximum level of 95 dBA L_1 .

2.3 Prediction Method and Assumptions

The noise impact of the dust extractor has been predicted at the nearest receptor using conservative noise propagation formulae as applied to a vertical plane source. No adjustments have been made for ground factor, meteorological conditions, or building shielding (either within site or externally).

The MCL has been assumed to be an enclosed space surrounded by solid walls, with 10% of the façade comprised of non-acoustic louvres or openings.

3. PREDICTED NOISE LEVELS

The nearest sensitive receptor is approximately 780 metres from the boundary of the BlueScope site, and 900 metres from the MCL building. Based on this distance, the predicted noise levels at the nearest residential community are presented in **Table 2.2**. Predictions are noted to be conservative, thus based on the operation of the MCL, compliance is predicted to be achieved.

Descriptor	Predicted level at nearest receptor		
LAeq,15min	≤29 dBA		
LA1,1min	≤39 dBA		

Table 2.1: Predicted Noise Levels

3.1 Predicted Traffic Noise Impact

The proposed MCL7 is expected to generate an additional 49 inbound truck movements per week, and 103 outbound truck movements per week, as compared to the current traffic flows.

Assuming truck movements are uniformly distributed during the day, the increase is the equivalent of less than one additional truck movement per hour. Peak hour truck movements may result into less than five truck movements per hour.

Based on the above assumption, compared to existing traffic flows on the non-residential road network, this will result into negligible increase to traffic noise levels.

4. SUMMARY

Based on the conservative assumption of this assessment, the Project is not considered an offensive industry in terms of noise pollution at residential receptors. Compliance is predicted for the proposed operations of MCL7.

The Project will not have a significant adverse impact in the locality, or on the existing or likely future development on other land in the locality, and as such does not result in a significant level of offence.

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APPENDIX E

HAZARD ASSESSMENT

Hazard Assessment of Proposed BlueScope Steel Metal Coating Line at Erskine Park, NSW

For Environmental Resources Management

10 March 2022

Doc. No.: J-000524-BSL-001

Revision: 0



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1 SUMMARY

BlueScope Steel Ltd (BSL) is proposing to construct a new metal coating line (MCL-7). One possible site is at its Western Sydney Service Centre (WSSC) in Erskine Park, NSW, where BSL currently operates a Coil Paint Line (CPL-8).

The BSL site at Erskine Park is zoned IN1 Industrial, where 'Hazardous' and 'Offensive' industries are prohibited. Given that MCL-7 will store and process dangerous goods, BSL sought advice regarding the potential permissibility of the proposal at the Erskine Park site.

To evaluate permissibility, an assessment was undertaken to determine the potential extent of offsite effects and to qualitatively assess whether risks to surrounding land uses are likely to meet the land use safety risk criteria in Hazardous Industry Planning Advisory Paper (HIPAP) No.4 1. Demonstrating compliance with the risk criteria can provide assurance that the proposal would be 'Potentially Hazardous' rather than 'Hazardous'.

NSW State Environmental Planning Policy No.33 (SEPP 33) 2 applies to the proposed development, the main contributors being:

- Total DG Class 8 PG II corrosive substances, which exceed the 25 tonne threshold quantity.
- Hydrogen storage, as the distance to boundary may trigger the screening criteria in the Applying SEPP 33 guidelines 3.
- Molten metal, which is a specifically referenced in the Applying SEPP 33 guidelines 3.

A list of potentially hazardous incidents was developed from the minutes of a hazard identification workshop held on February 16th 2022 and include events with the potential to cause a fire, explosion and/or release of toxic gas or vapour.

Based on the findings of the preliminary consequence analysis, the hazards identified are expected to be mainly contained within the site boundaries. The incidents where offsite effects may occur, such as a hydrogen explosion or stack emissions from process failures, are likely to be contained within the industrial area and injury and irritation consequences from emissions are not expected to reach sensitive land uses which are more than 500m away.

The conclusion of the present review is that a Preliminary Hazard Analysis (PHA) that will be undertaken to accompany the Environmental Impact Statement (EIS) will be able to demonstrate that the land use safety risk criteria can be met. Hence the proposed MCL-7 development at Erskine Park is likely to be a 'potentially hazardous' rather than a 'hazardous' industry.



Notation

Abbreviation	Description		
AEGL	Acute Exposure Guideline Limit		
Arriscar	Arriscar Pty Limited		
BSL	BlueScope Steel Ltd		
со	Carbon Monoxide		
CO ₂	Carbon Dioxide		
DG	Dangerous Good		
EIS	Environmental Impact Statement		
ERM	Environmental Resources Management Australia Pty Ltd		
H ₂	Hydrogen		
HAZID	HAZard IDentification		
НІРАР	Hazardous Industry Planning Advisory Paper		
HNO₃	Nitric Acid		
IBC	Intermediate Bulk Container		
ktpa	kilo tonnes per annum		
MCL	Metal Coating Line		
N ₂	Nitrogen		
Nm ³	Normal metres cubed		
NO ₂	Nitrogen Dioxide		
CPL	Coil Paint Line		
PG	Packing Group		
РНА	Preliminary Hazard Analysis		
PPE	Personal Protective Equipment		
TNT	Trinitrotoluene		
SEPP 33	State Environmental Planning Policy No.33		
VOC	Volatile Organic Compounds		
WSSC	Western Sydney Service Centre		



2 INTRODUCTION

2.1 Background

BlueScope Steel Ltd (BSL) is proposing to construct a metal coating line (MCL-7). One possible site is at its Western Sydney Service Centre (WSSC) in Erskine Park, NSW, where BSL currently operates a Coil Paint Line (CPL-8).

The BSL site at Erskine Park is zoned IN1 Industrial, where 'Hazardous' and 'Offensive' industries are prohibited. Given that MCL-7 will store and process dangerous goods, BSL wishes to evaluate the permissibility of the proposal at the Erskine Park site.

The evaluation of permissibility requires an assessment of the proposal under NSW State Environmental Planning Policy No.33 (SEPP 33) 2, and a hazard assessment to determine the extent of offsite effects. If there are offsite effects, it is necessary to ensure that any risk to surrounding land uses would meet the risk criteria in Hazardous Industry Planning Advisory Paper (HIPAP) No.4 1. Demonstrating compliance with the risk criteria can provide assurance that the proposal would be 'Potentially Hazardous' rather than 'Hazardous'.

A Potentially Hazardous or Potentially Offensive development is permissible in land Zoned IN1 at Erskine Park, under SEPP 33.

Arriscar Pty Ltd (Arriscar) was commissioned by Environmental Resources Management Australia Pty Ltd (ERM) to undertake the SEPP 33 evaluation of the MCL-7 proposal on behalf of BSL.

This report describes the study and findings.

2.2 Scope of Systems Covered

The scope of the study covers the following:

- Proposed Metal Coating Line (MCL-7) at Erskine Park.
- Existing Coil Paint Line (CPL-8) at Erskine Park.
- Associated dangerous goods storage.



3 SITE LOCATION AND SURROUNDS

The WSSC site is located at 25-55, Templar Road, Erskine Park, NSW 2759. It occupies Lot 3/ DP 1094504, in the local government area of the City of Penrith.

A site location map is shown in Figure 1.

Figure 1: WSSC Site Location



The site is located in an industrial area (zone IN1) and is surrounded by warehouses and a Cleanaway landfill facility to the west.

The existing development on the site is CPL-8. The vacant area to the south of CPL-8 is proposed for MCL-7, as shown in Figure 2.

The nearest meteorological station is at Horsley Park, 6 km away.

The residential areas and sensitive land uses closest to the site include:

Residential area:	Tippani Place, Erskine Park (950 m)		
Schools:	Erskine Park High School (1520 m)		
	Mamre Anglican School (1660 m)		
Child-Care Centres:	Little Smarties early Education Centre (1600 m)		
	Pepper Tree Early Education Centre (1700m)		
Aged care Centre:	Emmaus Retirement Village, Kemps Creek (500 m)		



Figure 2: MCL-7 Location on Site





4 BRIEF DESCRIPTION OF FACILITY

4.1 MCL-7

Coils are delivered to the site from BSL's Port Kembla Steelworks by trucks. They are unloaded by cranes and stored in a yard.

The metal coating process consists of the following steps:

- 1. Uncoiling of the coils received.
- 2. Strip shearing and seam welding of the uncoiled strip.
- 3. The strip is passed through an accumulator, a vertical equipment with sufficient inventory to feed coating section of plant.
- 4. The strip is heated to 720°C and cleaned in a gas fired furnace. Combustion air is controlled to maintain reducing conditions. This results in carbon monoxide in the flue gases.
- 5. The cleaned strip is next passed through an annealing furnace which is an electric induction heated furnace. The strip is subject to annealing temperature cycles and cooled to 600°C. The characteristic of this furnace is to remove all traces of oxygen by using a mixture of hydrogen and nitrogen, where the hydrogen reacts with any residual oxygen and the nitrogen maintains an inert atmosphere. Hydrogen and nitrogen are piped and premixed.
- The next step is metal coating in a refractory lined metal coating pot containing molten Zinc/Aluminium alloy at ~600°C. Molten alloy is applied by passing the strip through the pot. Alloy is melted in a separate pre-melt pot via electrical induction. Ingots are added to the pre-melt pot.
- 7. The coated strip is subject to air jets stripping to remove excess molten alloy coating to give desired coating mass to the product.
- 8. The strip is the cooled by air jets and immersing in a water quench tank.

Up to this point the process is common to all the coil. The strip is then directed to one of the following streams depending on the end product. The process is continuous.

Stream 1: Product to Coil Paint Line

9. Metal coated strip is subject to a Skin Pass Mill to suppress surface spangle and to a Tension Leveller for strip shape control and flatness. It is then sent to the Paint Line.

Stream 2: Product to Resin Coating (not painted)

- 10. The coated strip is applied with passivation chemicals via roller coater. Strip is then dried in a gas fired / hot air recirculation oven.
- 11. In the next step, an acrylic resin is coated on the strip via roller coater. The strip is cured via electric induction oven. Volatile organics are vented to stack.
- 12. The strips exit the process via a strip accumulator (similar to Step 3).
- 13. The strip undergoes strip shearing (mechanical process).
- 14. The sheared strip is re-coiled into rolls for despatch.

The process is supported by chemical storage (additives), and a cooling tower system to recover and recycle process water.

Other utilities include:



- Natural gas for gas fired furnaces (piped from street distribution line through a pressure regulating station).
- Hydrogen gas (supplied from pressurised tube trailer). The hydrogen supply trailer is replaced periodically by the supplier.
- Nitrogen gas from a liquid nitrogen storage and vapouriser. This equipment is installed and maintained by the vendor company.
- Electricity supply from grid. Swich gear and substations for high voltage supply to induction furnaces.
- Process water from towns water supply to make up for cooling tower losses.

The process operates on a 24/7 basis with a design throughput of 240 ktpa (160 ktpa painted product and 80 ktpa resin coated product).

A schematic diagram of the process is shown in Figure 3.

4.2 CPL-8

The CPL consists of the following:

- 1. Feed of metal coated strips from MCL-7 or received from Port Kembla Steelworks.
- 2. CPL surface preparation by treating with caustic.
- 3. CPL primer application via roller coater and curing. The exhaust gases from the dryer containing VOCs are passed through a thermal oxidiser before venting to atmosphere. Emissions will be monitored.
- 4. Paint coating via roller coater and curing. The curing step is similar to the primer application.
- 5. Paint and chemicals storage.



Figure 3: Schematic Diagram of Metal Coating Line





4.3 Chemicals Storage

The following Chemicals are stored on site.

4.3.1 MCL-7

Table 1 lists the proposed chemicals storage for MCL-7.

Chemical	UN No.	DG Class	PG	Quantity, kL	Type of storage	Usage
Nitric acid		8	11	1.25	IBC	
Hydrochloric acid	1789	8	II	0.2	Plastic drum	Laboratory
Biosperse 250 & 550 (biocide)	3265	8	II	0.2 each	Plastic Drum	Cooling Tower
Acrocryl 63-932	-	Non- hazardous	-	2.4	Packaged	Resin Coat
Acrocryl 63-988	-	Non- hazardous	-	48	Packaged	Resin Coat
Chemkote F2		8		7	IBCs	Passivation
Bonderite Passivant (Potassium hydroxide)	1814	8	II	10	IBCs	Passivation
Resin A4 & A3	-	Non- hazardous	-	8	Packaged	Resin Coat
Diesel fuel	1202	C1		1	Drums	Emergency generator
Hydrogen	1049	2.1	N/A	5000 Nm ³ (4.5 t)	Tube trailer	Furnace conditioning
Nitrogen (Cryogenic liquid)	1977	2.2	N/A	Not known	Bulk storage	Furnace conditioning
Molten metal Zn/Al	3257	9		8t (pre- melt pot)	In process	Metal coating
				23 t (coating pot)		

Table 1: Chemicals used in MCL-7



4.3.2 CPL-8

Table 2 lists the proposed chemicals storage for CPL-8.

Chemical	UN No.	DG Class	PG	Quantity, kL	Type of storage	Usage
Paint related material	1263	3	111	205	Packaged	Paint coating
Paint	1263	3	111	60	Above ground tank	Paint coating
Chromic acid solution	1755	8	II	18 (SafeWork notification)	IBC	Typical quantity 3 kL
Potassium hydroxide	1814	8	II	6	IBC	Surface preparation
Hydrochloric acid	1789	8	II	4	IBC	Typical quantity 3 kL
Sodium hydroxide	1824	8	II	4	IBC	Typical quantity 3 kL
Caustic alkali liquid n.o.s.	1824	8	II	15	Process vessel	Typical quantity 7 kL

Table 2: Chemicals used in CPL-8

4.4 Screening for SEPP 33 Applicability

A summary of chemicals to be considered for SEPP 33 screening 3 is provided in Table 3.

Table 3: Chemicals for SEPP 33 Screening

Chemical	DG Class	PG	Total Quantity, kL	Threshold distance to boundary, m	SEPP 33 applies?
Corrosives	8	II	58.65	-	Yes. Total > 25 tonnes
Flammable liquids	3	111	265	18	No. Distance to boundary > 18 m
Compressed flammable gas	2.1	N/A	0.45	25	Possible, depending on location of H ₂ on site
Molten metal	9	-	31 t	-	Class 9 is excluded except molten metals. SEPP 33 applies.

SEPP 33 applies on three counts: (a) Corrosives storage exceeds 25 tonnes; (b) Molten metals processing is considered potentially hazardous; and (c) Hydrogen storage may reach threshold distances.



5 HAZID METHODOLOGY

5.1 HAZID Technique

The HAZID was based on a "what if" technique, using a set of guideword checklist. The main features of the approach are:

- Focus on the causes in depth.
- Interactive workshop.
- On-line recording of minutes.

5.2 HAZID Guidewords

The HAZID was based on the checklist of guidewords listed in Table 4. These guidewords were used as prompts.

No.	Hazard Description	Sources				
1	Furnace Operations					
1.1	Gas fired furnaces	Furnace explosions, toxic flue gas releases				
1.2	Dryers	Explosion in dryers, VOCs in stack emissions				
1.3	Hydrogen	Hydrogen releases, Hydrogen-nitrogen mixture releases, fires and explosions				
2	Molten Metal Operations	5				
2.1	Metal coating pot	Molten metal spills, metal-water explosions				
2.2	Ingots addition	Wet ingot and explosion in pot				
3	Utilities					
3.1	Cooling towers	Legionella exposure				
3.2	Cooling towers	Exposure to dosing chemicals				
3.3	Natural gas	Gas release and fire/ explosion				
3.4	Electrical	Transformer fire/ explosion				
4	Paint Line					
4.1	Flammable liquids	Fire				
4.2	Paint curing	Emission of VOCs				
5	Chemical Storage					
5.1	Corrosive liquids	Spill, exposure, reactions				
5.2	Flammable liquids	Spill, ignition and fire				
5.3	Tanks	Tank overfill, transfer hose failure				
6	Asphyxiates					
6.1	Nitrogen	Release, accumulation, exposure				
7	On-site DG Transport					
7.1	Traffic accident	DG spill and exposure				

Table 4: HAZID Checklist



5.3 Workshop Sessions

A HAZID study team was selected with each team member having specific skills relating to the design and operation of the facility. The following steps were followed in the HAZID process:

- Select each applicable guideword in the checklist.
- Identify sources of the hazard (systems/ subsystems).
- Construct a table to include the following:
 - ° Hazard No.
 - ° Description
 - ° Source(s) of hazard
 - ° Causes
 - ° Consequences
 - ° Safeguards
 - ° Recommendations

5.4 Workshop Team

The workshop team is listed in Table 5.

Table 5: Workshop Participants

Name	Organisation	Title			
Danyil Skora	ERM	Principal Consultant/Team Lead			
Thomas Buchan	ERM	Environmental Scientist			
Robert Parisi	BSL	Capital Portfolio and Governance Manager			
Cherie Sammut	BSL	Senior Environment Advisor -Slabmaking & Western Sydney Service Centre			
Matt White	BSL	Graduate Mechanical Engineer			
Gary Meta	BSL	Operations Manager MCL7			
Richard Ainsworth	BSL	Senior Engineer Process and Technical Safety			
Lauren North	BSL	Process Engineer - Midstream			
Geoff Tapsell	BSL	Senior Process Engineer			
Murray Ackers	BSL	Process Engineer			
Raghu Raman	Arriscar	Facilitator			
John Paul Maiorana	Arriscar	Principal Consultant			

5.5 Workshop Sessions

Workshop sessions were held on February 16th 2022 (all day session).

Sessions were held online through Microsoft Teams.



5.6 Workshop Minutes

Minutes of the workshop were recorded online using the software PHA-Pro v.8. The minutes are included in Appendix A.

5.7 List of Hazardous Incidents

From the HAZID minutes, a set of hazardous incidents were extracted for the WSSC. The list is provided in Table 6.

No.	Hazard Description
MCL-7	
1	Gas explosion in gas fired furnaces and dryers
2	Flue gas leak from furnaces into workplace and CO exposure
3	High pressure H ₂ release from pipework
4	H ₂ /N ₂ release from pipework
5	H ₂ -air explosion in furnace
6	Vent fire (excess H ₂)
7	Molten metal spill outside pot
8	Molten metal-water explosion of spilt metal
9	Wet ingot fed to molten coating pot and explosion
10	Exposure to legionella bacteria in cooling tower
11	Release of corrosive liquids during passivation application
12	Gas explosion in passivation dryer
13	Resin spill and dry resin residue fire
14	Fire in resin curing dryer from overheating
15	Chemicals release from tank storage (tank failure or overfill)
16	Nitric acid spill and exposure to NO ₂ fumes
17	Release of natural gas from pipework and jet/ flash fire
18	Release of high-pressure hydrogen from tube trailer and jet/flash fire / Vapour cloud explosion
19	Transformer coolant release and fire
20	Transformer explosion
CPL-8	
21	Exposure to corrosive alkaline material in CPL surface preparation
22	Flammables external storage fire (Class 3 liquids)
23	Flammables internal storage fire (Class 3 liquids)

Table 6: List of Hazardous Incidents



BSL MCL-7 at Erskine Park Hazard Assessment Study

No.	Hazard Description
24	Gas explosion in CPL dryer
25	VOC emission from stack due to thermal oxidiser trip
26	Loss of containment from corrosive chemicals storage and exposure



6 HAZARD CONSEQUENCE ANALYSIS

This section describes the consequence analysis of the hazards listed in Table 6.

Detailed consequence analysis has not been carried out, the focus being to determine whether or not the hazard will have off-site consequences that affect surrounding land uses.

6.1 Gas Explosion in Gas Fired Furnaces and Dryers

One of the common reasons for an explosion is attempting to light the furnace with inadequate purging. This is normally addressed by the burner management system that conducts a purge cycle to pre-determined period to purge any residual gas before start up.

The second reason is typically failure of the combustion air and failing to stop fuel gas flow. This is also managed by the burner management system where loss of air triggers a furnace trip by closing two gas valves in series (gas code requirement).

In furnaces producing CO, accumulation of CO in pockets in the furnace arch may result in inadequate removal of CO. When the CO reaches flammability limits, an explosion may result.

The consequences of a furnace explosion are:

- Structural damage
- Refractory damage
- Damage to adjacent equipment
- Potential for serious injury or fatality to personnel nearby

In the explosion incidents reported 4, there have been severe equipment damage, but this damage was confined to the vicinity of the furnace and did not impact offsite.

In many designs, explosion venting panels are provided, designed to NFPA 86 to vent the explosion and minimise the damage.

6.2 Flue Gas Leak from Furnace Exhaust Duct

The gas fired furnace is operated at near stoichiometric air (no excess air) and hence the flue gases would contain carbon monoxide (CO). In the event a leak from the flue gas duct within the MCL-7 building, the following consequences may result:

- 1. Exposure of nearby personnel to CO and toxic impact
- 2. Emission of CO through the building roof ventilation and dispersion to atmosphere

Effect 1 can be mitigated by installing CO monitor, wearing personal CO monitors and alarm, warning personnel to evacuate. Subsequent response will be with the assistance of breathing apparatus.

Effect 2 may have offsite impact. However, since the release is diluted with ambient air before roof discharge, and the gas is neutrally buoyant, ground level concentration of CO is expected to be low. In the Preliminary Hazard Analysis, this incident will be modelled to estimate impact distances.

The frequency of a flue gas duct failure is reported as 1.0E-6/ hour 5. The size of the leak is not reported. This is equivalent to 8.76E-03 per annum.

Based on combustion rates and CO content in the flue gas, gas dispersion modelling would need to be conducted to determine the offsite effect.



6.3 Hydrogen Release from Storage or Pipework

The hydrogen tube trailer would contain up to 10 or 12 tubes, manifolded for supply. The supply pressure is of the order of 200 bar, but would slowly depressure as H_2 is consumed.

The total inventory of hydrogen is approximately 350 kg. A leak from the manifold would result in hydrogen release. On ignition, a jet fire would occur.

A hydrogen release from a 25mm pipework was modelled in Phast 8.4. The jet fire consequences are shown in Figure 4.



Figure 4: Hydrogen Release Jet Fire Radiation Profiles

The distance to 4.7 kW/m² extends to only 14m from the release point and this distance would fall within the site boundary. There is no offsite effect from jet fires of hydrogen. Radiation intensities of 12.5 kW/m² did not occur at ground level.

Depending on the degree of congestion, a delayed ignition would result in an explosion. The explosion overpressure contour (using the TNT model) is shown in Figure 5.

The distance to an explosion overpressure of 7 kPa is 34m. This distance is either contained within the site, or within the industrial area.

The distance to 14 kPa overpressure is 24m. This distance would fall within the site boundary. The HIPAP 4 risk criteria would be satisfied.





Figure 5: Hydrogen Release Explosion Profiles

6.4 Hydrogen Vent Fire

An excess flow of hydrogen to the annealing furnace would result in hydrogen being vented through the stack. If ignited, this would result in a stack fire. There is a potential for flash back to the furnace and furnace explosion.

The thermal radiation from a torch fire on the vent stack would not impact ground level offsite, as the fire is elevated, and fraction radiated from a hydrogen-air flame is much lower than a hydrocarbon flame.

6.5 Molten Metal-Water Explosions

Steam explosions occur when molten metal and water are mixed together producing a violent vaporisation of the water, which results in an overpressure wave. In the case of molten aluminium and zinc, it is not just a steam explosion, but hydrogen is generated by an electrochemical reaction which contributes to the intensity of explosion.

Main causes of a potential explosion at MCL-7 are:

- 1. Molten metal overflow or spill from pre-melt or coating pot onto the ground that contains moisture (damp concrete).
- 2. Accidental water ingress into coating pot.
- 3. Wet ingot added to the pre-melt pot.

The intensity of explosion depends on the quantity of water involved. TNT explosion models are used for modelling molten metal-water explosions.

The overpressure produced by a steam explosion is modelled using the hemispherical TNT equivalence model 6. This model accounts for reflection of the explosion overpressure from the ground and is more conservative that the spherical version of the model. The overpressure as a function of distance is shown in Table 7 below for steam explosion with molten iron.



Quantity of	Explosion	Distance to Overpressure (m)							
Premixed Water	Efficiency	70 kPa	35 kPa	21 kPa	14 kPa	7 kPa	3.5 kPa		
100 mL	5%	<1	<1	1.2	1.4	3	5		
1 L	5%	1.3	2	2.8	3.3	6.2	11		
10 L	5%	3.2	4.5	6	7.3	13	22		
100 L	5%	7	10	12	14	30	50		
1000 L	5%	13	21	28	32	61	110		

Table 7: Overpressure Generated by Metal-Water Explosions

The explosion consequences are summarised in Table 8.

Table 8: Metal-Water explosion Consequences

No.	Quantity of water	Explosion Consequence
1	100 mL	Damage equipment immediately adjacent to the explosion as well as ejecting material from the pot
2	1L	Pot significantly damaged or overturned (35 kPa) and damage to plant (14 kPa) for a distance of 3.3 m around the centre of the explosion. This explosion could also cause injuries due to the overpressure (7 kPa) at a distance of 6 m around the pot, but the injury potential from ejected metal is higher.
3	10 L	Significant damage, including complete destruction of the pot and other items (70 kPa) in a 3 m radius, distortion of reinforced structures (21 kPa) for distance of 6 m and injuries due to overpressure (7 kPa) for a distance of 13 m. This shows the highly destructive force associated with a relatively small quantity of water in a steam explosion.
4	100 L – 1000L	Catastrophic explosion causing plant destruction and damage for a significant distance.

Given the strict control of water in the plant, and housekeeping, it is unlikely that significant quantity of water would be present in the vicinity of the pre-melt and coating pots. Even at the worst case of 10L water, the consequences of an explosion would be confined within the site.

The possible scenario is wet ingot and 100 mL water, resulting in localised damage.

It should be noted that the overpressure-distances in Table 8 have been calculated on the basis of steam explosions with molten iron. The explosion mechanism for Zn/Al is different, which is through hydrogen evolution. This will be addressed in the PHA, once design details are available.

6.6 Resin Fire

The acrylic resin is non-hazardous, but combustible. It needs an external fire to ignite. The fire effects would be localised, with a smoky flame containing toxic combustion products such as CO and CO₂.

A source of fire is resin dust accumulation in the plant. Diligent housekeeping can eliminate this problem.

A resin fire would have localised effect and offsite effect is not expected.





6.7 Release of Chemicals from Containment

6.7.1 Tank Storage

The only tank storage contains paint related material, which is Class 3 flammable, PG III. Loss of containment can occur from:

- (a) Overfill during product receival.
- (b) Hose failure during product transfer.
- (c) Paint tanker drive away while still connected.

The prevention measures include tank level monitoring, inventory management for product receival, hose testing and maintenance and driver training.

The tank is bunded to contain the full tank capacity. Hazardous area classification and ignition controls apply.

If a spill is ignited, a pool fire would result. The consequences of the fire are thermal radiation impacting areas likely to be within the site boundary as the tank size is small. A buoyant smoke plume may affect neighbouring industrial facilities.

6.7.2 Packaged Storage

Most of the corrosive chemicals are kept in IBCs in a roofed store. The store is bunded to AS 3780-2008 to contain spill. Acidic and alkaline materials are kept in separate bunds to prevent reaction between incompatible materials.

Spill cleanup kits are available, and all personnel handling the materials wear appropriate PPE.

The consequences are localised and offsite effects are not expected.

Fire hazards exist for the packaged flammable store. Loss of containment can occur from damaged IBCs, or forklift caused damage. The flammable packaged store is bunded to the requirements of AS 1940, and the store it a classified hazardous area with control of ignition sources.

A flammable liquids storage fire is likely to cover the entire store and potentially impact on other adjacent plant areas on the site. Firefighting facilities are provided, and site emergency response plan is initiated. Once again, offsite impact is unlikely.

Dosing chemicals for the cooling tower are non-flammable. They are handled wearing relevant PPE for toxic materials.

6.7.3 Nitric Acid Spill

Nitric acid quantity of storage is small (1.25 kL) in one IBC. At 30% concentration, a spill would result in evolution of toxic nitrogen dioxide. Breathing apparatus is required for emergency response.

Spill cleanup kits are available.

Nitric acid gas and fumes may cause eye, throat, respiratory and skin irritation. Because of its toxicity, nitric acid vapour generation from a pool of nitric acid spill has been modelled to determine potential offsite effects.

The Acute Exposure Guideline Limits (AEGL) for nitric acid are listed in Table 97.



	Conc	entration,	ppm		
Classification	10 min	30 min	1 h	End Point	
AEGL-1 (non- disabling)	0.16	0.16	0.16	No-effect level for notable discomfort in humans	
AEGL-2 (disabling)	43	30	24	No-effect level for inability to escape	
AEGL-3 (lethal)	170	120	92	No-effect level for lethality	

Table 9: AEGL Values for Nitric Acid

The vapour pressure of nitric acid over a pool of 40% nitric acid at 25^oC is reported as 0.0133 kPa 8. For a spill of full inventory (conservative), and a pool thickness of 6mm (concrete), a pool diameter of 16m results.

 HNO_3 vapour rate = k_G . A. (CO-C)

Where k_G = mass transfer coefficient, taken as 0.2 m/s

A = pool area $,m^2$

And C0 = interface concentration (2.86E-04 kg/m³)

C = ambient concentration, taken as zero.

The acid vapour generation rate is calculated as 0.012 kg/s.

Dispersion calculations were carried out in Phast 8.4 using dangerous dose as the endpoint. This is justified because the nitric acid AEGL technical support document (9) shows that AEGL-2 and AEGL-3 values for exposure times less than 4 hours were obtained using a dose relationship, $c^{N}t = dose$, ppm^N.hr, where N = 3 for both AEGL-2 and AEGL-3. The following methodology was used:

- 1. The AEGL-2 and AEGL-3 doses were obtained from the literature [9] in ppm³.h and converted to ppm³.min
- 2. These dose values were entered into Phast as endpoints for the dispersion calculations
- 3. The exponent N = 3 was provided to Phast for dose calculations.

To confirm the above approach, the dose as converted to ppm³.min was used to estimate equivalent dose concentrations at 10 minute, 30 minute and 1 hour exposures. These were then compared to the AEGL-2 and AEGL-3 values for the same exposure times, as shown in Table 10.

Exposure	Dose Dose		Calculate	Documented AEGL Values (ppm)				
Level	(ppm.n) [9]	(ppm.min)	10 min	30 min	60 min	10 min	30 min	60 min
AEGL-2	12977.875	778672.5	43	30	24	43	30	24
AEGL-3	776151.559	46569093.54	170	120	92	170	120	92

 Table 10
 Comparison of Calculated and Documented AEGL values

As the calculated values for AEGL-2 and AEGL-3 up to 1 hour exposure duration are consistent with the documented AEGL values, this approach is justified.



The results of dispersion footprints for AEGL 2 are shown in Figure 6.

The following observations can be made from Figure 6.

- The maximum distance to AEGL-2 is 187m, and occurs under weather condition F1.5.
- For weather condition 3B, the distance is 100m.
- AEGL-2 concentration can occur outside the site boundary for the above to weather conditions.
- For all weather conditions, AEGL-2 concentration does not reach residential areas and sensitive land uses, and hence will satisfy the 'irritation' criteria in HIPAP No.4.
- The toxic plume is narrow, with maximum width of only 25m. One can readily escape from exposure by moving cross-wind.



Figure 6: Toxic Dispersion Footprints for Nitric Acid AEGL-2

The results of dispersion footprints for AEGL 3 are shown in Figure 7.

Figure 7: Toxic Dispersion Footprints for Nitric Acid AEGL-3





The following observations can be made from Figure 7.

- The maximum distance to AEGL-3 is 63m, and occurs under weather condition F1.5.
- For weather condition 3B, the distance is 54m.
- AEGL-3 concentration is unlikely to reach beyond the site boundary for the above to weather conditions.
- For all weather conditions, AEGL-3 concentration does not reach residential areas and sensitive land uses, and hence will satisfy the 'injury' criteria in HIPAP No.4.
- The toxic plume is narrow, with maximum width of only about 10m. One can readily escape from exposure by moving cross-wind.

It can be concluded that spills of nitric acid within the bunded area would not cause an adverse impact at residential and sensitive land uses.

6.8 Stack Emissions of VOCs in Paint Curing

In the paint curing area, volatile organics from the coated paint would vapourise and be sent to the stack. They pass through a thermal oxidiser first to oxidise the VOCs to CO_2 before stack discharge. The emissions are expected to be regularly monitored as typically required by an EPA licence.

In the event of a thermal oxidiser trip. Unburnt VOCs would be emitted to atmosphere. The paint dryer is interlocked with the thermal oxidiser in that in the event of thermal oxidiser trip, the dryer also trips, and the emissions stop.

Any emissions are expected to be of a very short duration and not expected to impact on offsite facilities. Further, they would be contained within the industrial area.

The PHA will conduct dispersion modelling of this event, with the design details available at that time.





7 COMPLIANCE WITH RISK CRITERIA

The SEPP 33 screening in Section 4 and consequence assessment in Section 5 indicates the following:

- 1. SEPP 33 applies to the proposed development, the main contributors being:
 - Total Class 8, PG II materials exceeding 25 tonnes.
 - Hydrogen storage and distance to boundary may trigger SEPP 33.
 - Molten metal inventory. Even though Class 9 DGs are exempt from SEPP 33, molten metals are made an exception in the Applying SEPP 33 guidelines 3.
- 2. The consequences of hazards identified are expected to be mainly contained within the site boundaries.
- 3. The incidents where offsite effects may occur, such as a hydrogen explosion or stack emissions from process failures, are likely to be contained within the industrial area.
- 4. Injury and irritation consequences from emissions are not expected to reach sensitive land uses which are more than 500m away.

The conclusion of the present review is that a Preliminary Hazard Analysis that will be undertaken to accompany the Environmental Impact Statement (EIS) will be able to demonstrate that the risk criteria can be complied with, and hence the proposed MCL-7 development at Erskine Park is a "potentially hazardous" rather than a "hazardous" industry. Any additional safeguards that may be required will be identified in the PHA.

Therefore, the proposed development becomes permissible in the Zone IN1 industrial area.



8 **RECOMMENDATIONS**

The following recommendations arose in the hazard identification workshop.

	Recommendations	Place(s) Used
1.	Consider fixed CO monitoring and alarm near furnace area	Causes: 1.1.2.1
2.	Ensure H2 line is fully welded as far as possible with no fittings	Causes: 1.2.2.1
3.	Locate the H2/N2 blending station outside the MCL building and bring in only the lower pressure dilutes hydrogen.	Causes: 1.2.2.1
4.	Consider providing pre-heat to H2/N2 mixture to promote excess H2 combustion in the vent before stack emission	Causes: 1.2.4.1
5.	Consider excluding passivation dryer vent emission VOC monitoring during EPA licensing process	Causes: 4.1.2.1
6.	Ensure that a tank level gauge is available near the truck unloading point that is readily visible to the driver.	Causes: 7.1.1.2
7.	Review chemical spill emergency response plant to determine if nitric acid spills need separate procedure.	Causes: 7.2.1.1
8.	Review code requirements, considering the site constraint on preventing water in process areas	Causes: 8.4.1.1



BSL MCL-7 at Erskine Park Hazard Assessment Study

9 **REFERENCES**



Appendices



BSL MCL-7 at Erskine Park Hazard Assessment Study

Appendix A

Minutes of HAZID Workshop


System	What if	Causes	Consequence	Safeguard	Recommendations
1. Furnaces 1	1. Gas explosion in furnace	1. Incorrect gas/air mixture in premixing	1. Furnace damage	1. Designed to gas code	
				2. Burner management system control	
				3. Furnace trip on incorrect air/fuel ratio	
			 Potential for injury/ fatality to personnel in the vicinity 		
		2. Gas present in furnace during startup	1.	 Air purging prior to startup as part of burner management system 	
	2. Leakage of flue gas in the work place and exposure to personnel	1. Leaks from fittings	 Higher CO content in flue gas (no excess air), and potential for CO exposure, and injury 	 Personal monitor to be carried by people working in the area 	 Consider fixed CO monitoring and alarm near furnace area
	3. Toxics in flue gases	 Higher oil content in the coil received and VOCs vapourised in the furnace 	 Amount of oil present is negligible. 	1. Oil is controlled in the coil manufacturing at Spring Hill as part of quality control	
			2	 No formal limits for VOC set by EPA in the Spring Hill plant as oil is not normally present 	
			 Flue gas has high level of inerts and is non-combustible 		
		2. NOx from combustion	1. Emissions in stack	1. Monitored as part of EPA licensing	
		3. CO from no excess air	1. Emissions in stack	1. Monitored as part of EPA licensing	
	1. Strip overheated	1. Electrical control malfunction	1. Strip breakage and production interruption	1. Plant trip	
				2. Detailed procedure for re-start of Line	
				3. Temperature monitoring and TAH	
			 Strip quality problems and shape distorted 		
			No safety issues. Strips contained within the Line.		
	2. Hydrogen release from pipework to furnace (pure H2 or N2/H2 mixture)	1. Fittings leak	1. Potential for hydrogen vapour cloud explosion near the furnace	 Hydrogen pressure is let down closer to storage and LP H2 brought to blending (assume 100 kPa) 	 Ensure H2 line is fully welded as far as possible with no fittings
			 Jet fire of hydrogen and impingement on surrounding equipment 	1. Low pressure supply. Below sonic discharge pressure.	 Locate the H2/N2 blending station outside the MCL building and bring in only the lower pressure dilutes hydrogen.

Table 11: HAZID Workshop Minutes



System	What if	Causes	Consequence	Safeguard	Recommendations
			 Equipment damage and potential fatality 		
		2. Pipework failure	1.	1. H2 pipework designed to EIGA standards	
	3. Air present in pipework/ furnace during startup and H2/Air	1. Formation of H2/Air mixture. H2 has a flammability range of 4-74%	1. Equipment damage.	 H2 line is nitrogen purged prior to start up. Startup procedure 	
	explosion in pipework/ turnace		2. Personnel injured	 Furnace is purged with N2 gas prior to start up prior to admission of H2/N2 mixture 	
				 O2 measurement in the furnace atmosphere and dew point monitors (monitors H2O vaporised from strip) 	
			 Potential for blast pressure in annealing furnace to transfer to coating pot via the snout resulting in molten metal ejection locally with serious injury/ fatality potential. 	 Same safeguards that prevent an explosion 	
	 Excess hydrogen burnt off on the vent stack (vent fire) 	 H2 has a flammability range of 4- 74%, and the vent gas is above the auto-ignition temperature. 	 Potential flare at the vent stack and localised roof heating 	 Air injection into the vent to promote combustion within the vent line and no flame at the actual vent point. 	 Consider providing pre-heat to H2/N2 mixture to promote excess H2 combustion in the vent before stack emission
	1. Molten metal spill	1. Leak from the pot (refractory failure)	 Molten metal on ground. Equipment damage. 	 Maintenance re-lining of pot at scheduled intervals 	
				2. Operator surveillance	
				 High level condition monitoring of pre-melt pot 	
	2. Overfill of pot	 High rate of Zn/Al ingot addition, automatic addition maloperation 	1. Molten metal spill outside pot.	 First point of overflow is from pre-melt pot to coating pot, and spill is avoided. 	
				Coating pot level is monitored by sensors as well as visual monitoring by camera	
				 Calibration of ingot addition rate based on production rates, if operated automatically 	
	3. Molten metal ejection	1. Water ingress	1. Molten metal-water explosion.	1. Strict control of potential for water ingress - safe work practices and guidelines	
				2. No sprinklers in the building in the pot area	
				3. No firewater supply in the pot area	-
			 Serious injury/ fatality potential. 		
	 Ingot unloading and storage - may contain moisture 	1. Wet ingot fed to pre-melt pot	1. Molten metal-water explosion.	1. Ingots received in covered trucks	
				2. Ingots stored in building under cover	



System	What if	Causes	Consequence	Safeguard	Recommendations
				Ingots inspected for moisture and dried if found to be wet, prior to adding to pot	
				 Ingots inspected at supplier end for any moisture before loading on the trucks 	
			 Serious injury/ fatality potential. 		
	5. Induction heating failure	1. Potential for metal to freeze	1. Production interruption	 Back up emergency diesel generator with sufficient capacity to keep metal in molten condition. 	
	1. Molten metal spill	1. Leak from the pot (refractory failure)	 Molten metal on ground. Equipment damage. 	1. Maintenance re-lining of pot at scheduled intervals	
				2. Operator surveillance	
				 High level condition monitoring of pre-melt pot 	
	2. Overfill of pot	 High rate of Zn/Al ingot addition, automatic addition maloperation, and displaced into the coating pot 	1. Molten metal spill outside pot.	1. Coating pot level is monitored by sensors	
				2. Visual monitoring by camera	
	3. Molten metal ejection	1. Water ingress (rain water)	1. Molten metal-water explosion.	 Strict control of potential for water ingress - safe work practices and guidelines 	
				2. No sprinklers in the building in the pot area	
				3. No firewater supply in the pot area	
				 Building roof maintenance to ensure pot is in fully covered area 	
			 Serious injury/ fatality potential. 		
		 Splashing from dropped equipment in the pot 	 Potential for serious injury if sprayed on 	 Maintaining separation distance during lifting of equipment from pot - SOP 	
		 Strip snapped in pot in the submerged part 	1. As above	 Initial startup and post-trip restart procedure. 	
	4. Induction heating failure	1. Potential for metal to freeze	1. Production interruption	 Back up emergency diesel generator with sufficient capacity to keep metal in molten condition. 	
2. Cooling Towers	1. Cooling tower discharges	1. Cooling tower added chemicals to	1. Potential to exceed trade	1. Dosing rates controlled	
		nade waste discharge	waste agreement	2. Periodic cleaning and maintenance	
				3. Sampling and monitoring	
	2. Exposure to legionella bacteria	1. Build up in cooling tower circulation		1. Chemicals dosing	



System	What if	Causes	Consequence	Safeguard	Recommendations
			1. Health issues to exposed	2. Sampling and monitoring	
			personner	3. Regular cleaning of towers	
			2. No offsite impact		
3. Passivation Application	1. Release of hazardous	1. Blockage in circulation line	1. Overflow of material and spill	1. Area bunded to contain spill	
	chemicals during coating			2. Flow measurement and FAL	
			 Injury from corrosive substances (acids, alkali) 	1. PPE for corrosive liquids	
		2. Blockage in return line to the tank	1. As above		
		3. Overfill of coating tray	1. As above	1. Coating tray overflows back to the storage tank	
			 Localised impact. No offsite effect. 		
	2. Inadequate coating	1. Low chemicals in circulation	1. Quality problems	1. Level of chromium in coating is controlled	
			2. No safety issues		
4. Passivation drying	1. Gas explosion in dryer	1. Incorrect gas/air mixture in premixing	1. Furnace damage	1. Designed to gas code	
				2. Burner management system control	
				3. Dryer trip on incorrect air/fuel ratio	
			 Potential for injury/ fatality to personnel in the vicinity 		
		2. Gas present in dryer during startup	1.	1. Air purging prior to startup as part of burner management system	
	2. Toxics in flue gases	1. VOCs vapourised in the dryer	1. VOCs are not generated from Passivation dryer		 Consider excluding passivation dryer vent emission VOC monitoring during EPA licensing process
		2. NOx from combustion	1. Emissions in stack	1. Monitored as part of EPA licensing	
		3. Metal particulates	1. Release to environment	1. There are no metal particulates in the exhaust and no monitoring is required.	
5. Resin Coating	1. Release of resin during coating	1. Blockage in circulation line	1. Overflow of material and spill	1. Area bunded to contain spill	
				2. Flow measurement and FAL	
			 No injury from exposure expected as material is non- hazardous 	1. PPE liquids	
		2. Blockage in return line to the tank	1. As above		
		3. Overfill of coating tray	1. As above	1. Coating tray overflows back to the storage tank	



System	What if	Causes	Consequence	Safeguard	Recommendations
			 Localised impact. No offsite effect. 		
	2. Inadequate coating	1. Low resin levels in circulation	1. Quality problems	1. Level of resin in coating is controlled	
			2. No safety issues		
	3. Build-up of dry resin in the	1. Dead pockets			
	circulation system	 Spills on ground and dry resin residue 	1. Resin fire if ignited	1. Housekeeping. Can use water for washdown in this area	
				 Smouldering fire that can be controlled by hand held fire extinguishers (dry chemical type) 	
			2. Toxic fumes from fire	1. PPE required for firefighting	
			3. Injury potential		
6. Resin Curing Dryer	1. Exposure to VOC generated in	1. VOC vapours released from resin coating released from flue duct in work area	1. Personal exposure and injury	1. PPE worn	
	dryer during curing		2	2. Monitoring personnel for exposure	
	2. Fire in dryer	 Loss of control of induction heating and overheating 	1. Fire in induction oven and equipment damage		
			2. Excessive VOCs in the vent and potential for offsite effect. May exceed environmental exposure limit.	 Temperature monitoring and high temperature cutout 	
			3. Product damage		
7. Chemicals Storage	1. Resins Release from bulk	1. Tank failure	1. Spill to ground	1. Tanks bunded	
	storage		 Injury on exposure not expected (non-hazardous) 		
		2. Tank overfill from tanker	1. As above	 Tank level indicator. May not be visible to the driver. 	6. Ensure that a tank level gauge is available near the truck unloading point
				2. Tank bunded, but may not contain the spill depending on duration of overfill.	that is readily visible to the driver.
			2. Chemical flow to environment	 Bund drains isolated and opened only manually. Can be drained to a retention basin. 	
		 Bulk tanker driveway while still connected 	1. Spill to ground	1. Ground around tank storage area sealed to prevent escape to groundwater system	
	2. Chemical reaction in bund	 Incompatible liquids in the same bunded area 	1. Only materials lower than pH 7 will be stored in bunded area for MCL-7. No alkalis present.	1. Hazard eliminated	



System	What if	Causes	Consequence	Safeguard	Recommendations
	1. Release from drum or IBC	1. Forklift tynes damage	1. Exposure to corrosive liquids	1. Ticketed forklift operator	7. Review chemical spill emergency
	storage		and injury (50% filtric acid)	2. PPE worn by operator	spills need separate procedure.
				3. Forklift driver carries gas mask	
			 Exposure to NO2 fumes from nitric acid spill and potential for serious injury, fatality. May have offsite impact. 		
		2. Corroded drums	1.	 Drums are turned around routinely and not kept indefinitely 	
				 Neutralisation and spill adsorption kits on site 	
				3. New drums each time	
		3. Dropped load 1	1. 1	1. Forklift speed limits	
				2. Site traffic management system	<u> </u>
8. Utilities	 Release of natural gas from pipework 	1. Fittings/ flange leak	1. Jet fire	 New upgraded installation design to gas code 	
				 Hazardous area classification around metering station 	
				3. Control of ignition sources on site	
				 Gas [pipework condition monitoring and maintenance 	
			2. Flash fire		
			3. Vapour cloud explosion	1. Metering station in well ventilated area	
	1. Release of hydrogen from trailer truck	r1. Nozzle damage	1. Jet fire	 Construction to hydrogen standards by vendor 	
				2. Maintenance by vendor	-
				3. Hazardous area classification	
				4. Control of ignition sources	
			2. Flash fire		
			3. Vapour cloud explosion	1. Located in well ventilated area	
		2. Leak from fittings			
	 H2/N2 blending station malfunction 	1. Control failure	1. Incorrect H2/N2 ratio. Product quality issues if H2 is inadequate.	 H2/N2 ratio monitoring and trip on high H2 content. 	



System	What if	Causes	Consequence	Safeguard	Recommendations
	1. No offsite safety issues identified				
	1. Transformer fire	1. Coolant leak and ignition	1. Pool fire and thermal radiation. Escalation to other equipment	1. To be designed	8. Review code requirements, considering the site constraint on preventing water in process areas
			2. Toxic fumes from fires		
		2. High inductance			
	2. Transformer explosion	1. High inductance	1. Damage to surrounding	1. Relief valve in transformer coolant tank	
			equipment	2. High inductance trip	
		2. Overheating and pressure buildup	1.	1. High pressure trip	
	3. Switchboard fire	1. Short circuit	1. Electrical fire	 Fire extinguishers approved for electrical fires 	
			2. Toxic fumes in switch room and injury on exposure	1. PPE for firefighting	
	1. Hydraulic fluid hose burst	1. Degraded hose	1. Spray fire if ignited (behaves like propane torch fire)	1. Hose maintenance and replacement	
				2. Fire retardant hydraulic fluid	
		2. Overpressuring	1.	1. Pressure relief	
	2. Hydraulic fluid loss of	1. Tank leak	1.	1. Level sensor and LAL	
	containment in power unit	2. Fittings leak	1.	1. Inspections	
9. CPL surface preparation	1. Release of alkali from pipework	t 1. Fitting failure	 Exposure to corrosive liquid and injury 	1. PPE worn by operator	
				2. Installation integrity management	
				3. Safety shower/ eyewash station	
	2. Excessive alkali dosing	1. Control failure	1. Caustic carried over with strip.	1. Strip rinsed after alkali treatment	
			Product quality issues	2. pH monitoring in alkali solution	
	1. Chemicals release from	1. Fitting failure	1. Exposure to corrosive liquid	1. PPE worn by operator	
	containment		and injury	2. Installation integrity management	
				3. Safety shower/ eyewash station	
	2. post-caustic coating rinse failure	1. Water pump failure	 Residual alkali on strip reacts with chemicals in the chemicals coating step 	1. Pump failure alarm	
			2. Causes product quality problems	1. Quality monitoring of strips (paint sticking)	
		2. Water make-up failure			



System	What if	Causes	Consequence	Safeguard	Recommendations
10. CPL Primer application and	1. Inadequate coating	1. Low primer levels in circulation	1. Quality problems	1. Level of primer in coating is controlled	
cuning			2. No safety issues		
	2. Primer spill on ground	1. Overflow	1. Primer fire if ignited	 Housekeeping. Can use water for washdown in this area 	
				 Smouldering fire that can be controlled by hand held fire extinguishers 	
			2. Injury potential		
	1. Gas explosion in dryer	1. Incorrect gas/air mixture in premixing	1. Furnace damage	1. Designed to gas code	
				2. Burner management system control	
				3. Dryer trip on incorrect air/fuel ratio	
			 Potential for injury/ fatality to personnel in the vicinity 		
		2. Gas present in dryer during startup	1.	1. Air purging prior to startup as part of burner management system	
	2. Toxics in flue gases	 Excessive paint application and VOCs vapourised in the dryer 	1. Potential to form a flammable mixture of VOCs vent vented through stack	1. LEL monitoring in stack gases	
				 Dryer exhaust gases pass through thermal oxidiser to burn the VOCs prior o stack discharge 	
				 VOCs in stack monitored as part of EPA licence conditions 	
		2. NOx from combustion	1. Emissions in stack	1. Monitored as part of EPA licensing	
	3. Thermal oxidiser trip	1. Burner management system trips the plant	 VOCs directly to stack. May exceed EPA requirement. 	1. CPL stopped if thermal oxidiser fails	
11. CPL Finish coat application	1. Inadequate coating	1. Low paint levels in circulation	1. Quality problems	1. Level of paint in coating is controlled	
and curing			2. No safety issues		
	2. Paint spill on ground 1.	1. Overflow	1. Paint fire if ignited	 Housekeeping. Can use water for washdown in this area 	
				 Smouldering fire that can be controlled by hand held fire extinguishers 	
			2. Injury potential		
	1. Gas explosion in dryer	1. Incorrect gas/air mixture in premixing	1. Furnace damage	1. Designed to gas code	
				2. Burner management system control	
				3. Dryer trip on incorrect air/fuel ratio	
			 Potential for injury/ fatality to personnel in the vicinity 		



System	What if	Causes	Consequence	Safeguard	Recommendations
		2. Gas present in dryer during startup	1.	1. Air purging prior to startup as part of burner management system	
	2. VOCs in flue gases	1. Excessive paint application and	1. Potential to form a flammable	1. LEL monitoring in drying furnace	
		VOCs vapourised in the dryer	through stack	 Dryer exhaust gases pass through thermal oxidiser to burn the VOCs prior o stack discharge 	
				 VOCs in stack monitored as part of EPA licence conditions 	
		2. NOx from combustion	1. Emissions in stack	1. Monitored as part of EPA licensing	
	3. Thermal oxidiser trip	1. Burner management system trips the plant	 VOCs directly to stack. May exceed EPA requirement. 	1. CPL stopped if thermal oxidiser fails	
12. Paint storage	1. Fire in outdoor paint storage	1. Spill of paint or thinner and ignition	1. Pool fire in drums storage area	 Paint storage area has a firewater protection system initiated by fusible plug 	
				2. Hazardous area classification	
				3. Flame proof diesel forklift	
	2. Fire in indoor paint storage	1. Spill of paint or thinner and ignition	1. Pool fire in drums storage area	 Indoor paint storage area has a sprinkler protection system initiated by fusible plug 	
				2. Hazardous area classification	
				3. Flame proof diesel forklift	
13. CPL Chemical storage	1. Chemical tank overflow	1. Overfill from supply tanker	1. Spill on ground	1. Level monitoring	
		2. Transfer hose failure	1. Exposure to personnel and injury	1. Hose testing and maintenance	
		3. Tanker drive away while connected	1. Local effect.	1. Spill cleanup kit	
	2. Spill from packaged store	1. Forklift tyne damages IBC	1. Exposure to personnel and	1. Forklift speed limits	
			injury	2. Ticketed operator	
			2. Potential for fire if material is flammable	1. Hazardous area classification and ignition control	
	3. Incompatible chemicals in store	1. Human error. Stored in wrong	1. No immediate consequence.	1. Operating procedures	
		iocation.	containment occurs.	2. Operator DG training	
				3. Stores inspections	

APPENDIX F BDAR WAIVER



Metal Coating Line (MCL7)



BDAR Waiver Request

3 May 2022 Project No.: 0628175



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3 May 2022

Metal Coating Line (MCL7)

BDAR Waiver Request

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Acronyms and Abbreviations

BC Act	NSW Biodiversity Conservation Act 2016
BDAR	Biodiversity Development Assessment Report
CPL8	Coil Paint Line 8
DA	Development Application
DPE	NSW Department of Planning and Environment
EIS	Environmental Impact Statement
EPBC Act	Environmental Protection and Biodiversity Conservation Act 1999
ERM	Environmental Resources Management
Ktpa	kilo tonnes per annum
LSPS	Local Strategic Planning Statement 2020-2040
LGA	Local Government Area
MCL7	Metal Coating Line 7
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
The Project	construction and operation of Metal Coating Line 7
The Proponent	BlueScope Steel Limited
WSSC	Western Sydney Service Centre

1. INTRODUCTION

BlueScope Steel Limited (the Proponent) proposes to construct and operate Metal Coating Line 7 (MCL7) (the Project), an industrial development located within the Western Sydney Service Centre (WSSC) in Erskine Park, NSW. The Project is a proposed metal coating line that will produce Zincalume, which is a zinc/aluminium coated steel. The Proponent is seeking State Significant Development (SSD) consent under Part 4, Division 4.7 of the *Environmental Planning & Assessment Act 1979* (EP&A Act) for the Project.

The Proponent has engaged Environmental Resources Management Australia Pty Ltd (ERM) to prepare a Scoping Report for the Project, as a first step in the SSD consent process. The Scoping Report supports an application to the Secretary of the NSW Department of Planning and Environment (DPE) for Secretary's Environmental Assessment Requirements (SEARs). The SEARs will guide the preparation of an Environmental Impact Statement (EIS) for the Project as part of a broader Development Application (DA).

A desktop and site assessment of the Project site has determined that there are limited biodiversity values that could be impacted by the proposal. The Biodiversity Values Map also does not identify the land as having high biodiversity value. It is therefore concluded that a Biodiversity Development Assessment Report (BDAR) should not be required and it is requested that this requirement be waived.

This request is also based on the following assessment against the relevant biodiversity values contained within the *Biodiversity Conservation Act 2016* (Sections 1.5 and 6.3) and the *Biodiversity Conservation Regulation 2017* (Clauses 1.4 and 6.1) (refer to Table 3-1).

2. **PROJECT DETAILS**

The Project site is located at 25-55 Templar Road, Erskine Park, and consists of the following legal lot description: Lot 3 of DP 1094504. The Project site is located within a section of BlueScope's existing Western Sydney Service Centre (WSSC) across an area of 1.25 hectares to the south and east of an existing coil paint line to the north (CPL8). It is located within the City of Penrith Local Government Area (LGA).

BlueScope proposes to develop the Metal Coating Line 7 (MCL7) Project, which will be integrated into the existing WSSC facility and located to the south and east of the existing Coil Paint Line 8 (CPL8). The Project has a total capital investment value of approximately \$250 – 300 million.

MCL7 will produce Zincalume, which is a zinc-aluminium coated steel that is produced through the coating of coils with a zinc-aluminium alloy. The total combined plant throughput of MCL7 and CPL8 will be approximately 240 kilo tonnes per annum (ktpa).

Table 2-1 below details the BDAR waiver request information required for the Project.

Table 2-1 BDAR waiver request information	Table 2-1
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Requested Information						
Proponent Name	BlueScope Steel Limited					
Project Name	Metal Coating Line 7 (MCL7)					
Name and Ecological qualifications of person completing Table 3-1	Matt Davis BAM Accredited Assessor (BAAS18090) Bachelor of Science (Ecology and Conservation Biology), 2007 Master of Environment (Conservation Biology)					
Site street address, lot and DP, local government area	The Project site is located at 25-55 Templar Road, Erskine Park, and consists of the following legal lot description: Lot 3 of DP 1094504 It is located within the City of Penrith Local Government Area (LGA)					
Location map showing the development site in the context of surrounding area and landscape features	Refer to Figure 2.1.					
Site Map	Refer to Figure 2.1.					
Project Description	The proponent proposes to develop the Metal Coating Line 7 (MCL7) Project, which will be integrated into the existing WSSC facility and located to the south and east of the existing Coil Paint Line 8 (CPL8). The Project has a total capital investment value of approximately \$250 – 300 million. MCL7 will produce Zincalume, which is a zinc-aluminium coated steel that is produced through the coating of coils with a zinc-aluminium alloy. The throughput of MCL7 will be up to 240 kilo tonnes per annum (ktpa) of which up to 160 ktpa will be processed by the existing CPL8. The total throughput of the facility (MCL7 plus CPL8) will be up to 240 kilo tonnes per annum (ktpa). MCL7 will be generally produce two types of products from Cold Rolled feed coils:					
	Resin coated "bare" products such as TRUECORE® and Zincalume®					
	Zincalume® Feed Coils for CPL8 which will be painted to produce products such as COLORBOND® The Project will involve the construction of the following buildings and facilities that will be integrated into the broader WSSC site:					
	Two new MCL buildings including:					
	 A MCL Main Building located to the south of CPL8 containing the proposed MCL7 within the central portion of the building; and 					
	 A MCL Dispatch Building located to the east of CPL8 to allow for the dispatching of finished products; One new MCL7 chemical/material storage area through an expansion of the existing CPL8 paint and chemical storage area; and Three new stacks consisting of a furnace stack, passivation area stack, and a resin coating area stack. 					
Proposed Site Plan	Refer to Figure 2.2					





3. SITE CONTEXT

The Project site is in Erskine Park, NSW, wholly within the City of Penrith Local Government Area (LGA). The Penrith LGA contains a diverse range of land uses including residential, commercial, industrial, and agricultural. Rural and rural-residential land uses currently comprise 80 percent of the LGA, with the remaining 20 percent considered urban. In addition, the LGA contains 9,830 ha of land zoned nature reserves and national parks, including 17 percent of the remaining bushland of the Cumberland Plain. According to the LSPS, 58 percent of the workforce within the Penrith LGA are local residents.

The Project site is located within a historically cleared landscape within the Erskine Park Industrial Estate and is surrounded by existing light industrial and warehousing. The Project Area is zoned as *IN1 – General Industrial*, pursuant to the provisions of *State Environmental Planning Policy (Western Sydney Employment Area) 2009*.

The Project site is contained within BlueScope's existing Western Sydney Service Centre (WSSC), which currently contains:

- The Coil Paint Line 8 (CPL8) facility;
- Offices;
- A car park; and
- Grassed areas.

The Project site covers 1.25 hectares on one parcel of land. <u>The site has been previously cleared and</u> <u>does not contain any native vegetation (refer to Figure 3.1)</u>. Manicured non-native hedges are present along the site boundary.

The nearest treed vegetation is located immediately adjacent to the site on both the south western boundary, and south eastern boundary. The vegetation adjacent to the south eastern boundary is characterised by a narrow patch of non-native vegetation plantings that act as a screen between the site and Templar road (Figure 3.2).

The vegetation adjacent to the south western boundary is remnant patch of a mix of *Eucalyptus moluccana* and *Melaleuca spp*. likely to make up the NSW Class 'Coastal Valley Grassy Woodlands' (Figure 3.3). The project is unlikely to have an impact on surrounding vegetation, with no direct or indirect impacts to areas of native vegetation and habitat located on the adjacent property to the south-west.

A search of the NSW BioNet database for threatened species records within the last 50 years was undertaken on 4th March 2022. No threatened species are recorded within the Project site. The nearest threatened species records are of the Juniper-leaved Grevillea (*Grevillea juniperina subsp. Juniperina*), Grey-headed Flying Fox (*Pteropus poliocephalus*), Cumberland Plains Land Snail (*Meridolum corneovirens*), Southern Myotis (*Myotis aelleni*), Large Bent-winged Bat (*Miniopterus orianae oceanensis*). Habitat for these species are not present within the Project site, however highly mobile species may forage within the modified grasses or fly over the Project site as part of their generalist habitat requirements however they would not be dependent on the limited resources present. Threatened species records and vegetation mapping completed by the Department of Planning, Industry and Environment (2013) are presented in Figure 3.4.

An assessment against the relevant biodiversity values contained within the *Biodiversity Conservation Act 2016* (Sections 1.5 and 6.3) and the *Biodiversity Conservation Regulation 2017* (Clauses 1.4 and 6.1) has been completed and is present below (Table 3-1).



Aerial Photograph showing the Project site dated 1947

Source: Historical Imagery accessed 24 Feb 2022. https://portal.spatial.nsw.gov.au

Aerial Photograph showing the Project site dated 1978

Source: Historical Imagery accessed 24 Feb 2022. https://portal.spatial.nsw.gov.au

Aerial Photograph showing the Project site dated 2005

Source: Historical Imagery accessed 24 Feb 2022. https://portal.spatial.nsw.gov.au

Aerial Photograph showing the Project site dated 2020

Source: Historical Imagery accessed 24 Feb 2022. https://portal.spatial.nsw.gov.au

Figure 3.1 Historical Imagery



Figure 3.2Vegetation on south east boundary and adjacent road verge.Note: This vegetation will not be impacted by the proposal.



Figure 3.3Vegetation on adjacent lot to the south-west boundary.Note: This vegetation will not be impacted by the proposal.



			シリハ
	Legend	2	Ī
	Logona	Project Site	3
	4	Frekine Business Park Boundary	1
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	Flora Fauna	Juniper-leaved Grevillea	
		Cumberland Plain Land Snail	1
	•	Dusky Woodswallow	
1		Eastern False Pipistrelle	
and and		Greater Broad-nosed Bat	
Ritton		Grey-headed Flying-fox	-
illinni		Large Bent-winged Bat	
		Little Eagle	
1 1	*	Southern Myotis	- 4
-	₩ ☆	White-bellied Sea-Eagle	-
120	РСТ		-0
		Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	
and)		Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	8
	-	Grey Box - Forest Red Gum grassy woodland on shale of the southern Cumberland Plain, Sydney Basin Bioregion	
	Source: Bionet 20, NSW DCI Nearmap	22, Cumberland Plain West E_4207 DB, DTDB 2022 Imagery Feb 2022	A IN
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Drawing Size: A3 Reviewed By: SE Client: BlueScope Steel

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This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.



0.4Km

Biodiversity Value	Meaning	Potential Impact	Explain and document potential impacts including additional impacts prescribed under the Biodiversity Conservation Regulation 2017 (BC Regulation)*
Threatened species Abundance 1.4(a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat at a particular site	No	The Project site is situated in the Erksine Park Industrial Estate and is surrounded by existing light industrial and warehousing developments. The Project site is contained within BlueScope's existing Western Sydney Service Centre (WSSC) consisting of CPL8, offices, a car park and grassed areas. The site has been previously cleared and does not contain any native vegetation communities. Manicured non-native hedges are present along the site boundary. The nearest treed vegetation is located immediately adjacent to the site on both the south western boundary, and south eastern boundary. The vegetation adjacent to the south eastern boundary is characterised by a narrow patch of non-native vegetation plantings that act as a screen between the site and Templar road (Figure 3.1). The vegetation on the south western boundary is remnant patch of a mix of <i>Eucalyptus moluccana</i> and <i>Melaleuca spp.</i> likely to make up the NSW Class 'Coastal Valley Grassy Woodlands' (Figure 3.2). The project is unlikely to have an impact on surrounding vegetation, with the nearest element of the Project (internal access road hardstand) being approximately 18m from areas of native vegetation on the adjacent south-west property. The Project will not impact on any Threatened Ecological Communities.
			No threatened species have been recorded on site and no significant habitat features are available within the Project site. The nearest threatened species records are of the Cumberland Plains Land Snail (<i>Meridolum corneovirens</i>), habitat for this species of grassy open woodland with a ground layer of bark, leaves and logs is absent from the development footprint.
Vegetation Abundance 1.4(b) BC Regulation	The occurrence and abundance of vegetation at a particular site	No	The Project site is within BlueScope's existing Western Sydney Service Centre (WSSC), which has been previously cleared of native vegetation. The site has been previously cleared and does not contain any native vegetation communities. Manicured non-native hedges are present along the site boundary.
			The nearest treed vegetation is located immediately adjacent to the site on both the south western boundary, and south eastern boundary. The vegetation adjacent to the south eastern boundary is characterised by a narrow patch of non-native vegetation plantings that act as a screen between the site and Templar road (Figure 3.1). The vegetation on the south western boundary is remnant patch of a mix of <i>Eucalyptus moluccana</i> and <i>Melaleuca spp</i> . likely to make up the NSW Class 'Coastal Valley

Table 3-1 Assessment of Biodiversity Values

Biodiversity Value	Meaning	Potential Impact	Explain and document potential impacts including additional impacts prescribed under the Biodiversity Conservation Regulation 2017 (BC Regulation)*
			Grassy Woodlands' (Figure 3.2). The project will not directly impact on any native vegetation communities is unlikely to have an indirect impact on surrounding vegetation on adjacent properties.
Habitat connectivity 1.4(c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	No	The Project site has been previously cleared and does not contain any trees or native shrubs. The Project site is within BlueScope's existing Western Sydney Service Centre (WSSC), which has been previously cleared of native vegetation. As such, the site does not provide habitat features that contribute to habitat connectivity. It is noted that highly mobile species may forage within the modified grasses or fly over the Project site as part of their generalist habitat requirements however they would not be dependent on the limited resources present.
Threatened species movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	No	The Project site has been previously cleared and does not contain any trees or native shrubs. The development footprint is within BlueScope's existing Western Sydney Service Centre (WSSC), which has been previously cleared of native vegetation. It is noted that highly mobile species may forage within the modified grasses or fly over the Project site as part of their generalist habitat requirements however they would not be dependent on the limited resources present.
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protective animals over a particular site and free from interference	No	Highly mobile species (including migratory birds and bats) may forage within the adjacent vegetated areas or fly over the Project site as part of their generalist habitat requirements, however they would not be dependent on the limited resources present and the Project would not alter or disturb any species movement patterns across this highly disturbed landscape.

Biodiversity Value	Meaning	Potential Impact	Explain and document potential impacts including additional impacts prescribed under the Biodiversity Conservation Regulation 2017 (BC Regulation)*
Water sustainability 1.4 (f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	No	The Project site is situated within the Wianmatta South Creek catchment, however, no streams, estuaries, wetlands, creeks or hydrolines are located within the development footprint. It is unlikely that the Project will impact water sources that sustain threatened species and threatened ecological communities.
Vegetation integrity 1.5(2)(a) BC Regulation	the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state	No	The Project site is located within the Erskine Park Industrial Estate and is surrounded by existing light industrial and warehousing. The Project site is contained within BlueScope's existing Western Sydney Service Centre (WSSC) which has been previously cleared and does not contain any native vegetation communities. Manicured non-native hedges are present along the site boundary. The nearest treed vegetation is located immediately adjacent to the site on both the south western boundary, and south eastern boundary. The vegetation adjacent to the south eastern boundary is characterised by a narrow patch of non-native vegetation plantings that act as a screen between the site and Templar road (Figure 3.2). The vegetation on the south western boundary is remnant patch of a mix of <i>Eucalyptus moluccana</i> and <i>Melaleuca spp.</i> likely to make up the NSW Class 'Coastal Valley Grassy Woodlands' (Figure 3.3). The project is unlikely to have an impact on the integrity of surrounding vegetation.
Habitat suitability 1.5(2)(b) BC Regulation	the habitat needs of threatened species are present at a particular site	No	The Project site is contained within BlueScope's existing Western Sydney Service Centre (WSSC) which has been previously cleared and does not contain any trees or native shrubs. Manicured non-native hedges are present along the site boundary. No threatened species have been recorded on site. No

Biodiversity Value Meani	ing F	Potential Impact	Explain and document potential impacts including additional impacts prescribed under the Biodiversity Conservation Regulation 2017 (BC Regulation)*			
			There are no karst, caves, crevices, cliffs or other areas of geological significance within the Project site or the BlueScope Steel. It is unlikely the grass and manicured shrubs within the Project site provide habitat needs for threatened species.			

4. CONCLUSION

The Project site does not support any threatened species or ecological communities and no significant habitat features have been identified. Based on the long history of vegetation clearance and disturbance, it is unlikely that the Project would result in any significant impacts on ecological values listed under the BC Act or the EPBC Act. For the reasons provided above it is considered that the proposed development will not result in any significant impact on biodiversity values of the site, and that a waiver to the provision of a BDAR is requested.

5. **REFERENCES**

- DPIE (2013) Remnant Vegetation of the western Cumberland subregion, 2013 Update. VIS_ID 4207. Retrieved online <u>https://datasets.seed.nsw.gov.au/dataset/remnant-vegetation-of-the-</u> western-cumberland-subregion-2013-update-vis_id-4207fd1f4
- MRC. (2020). Local Strategic Planning Statement 2020-2040. Murray River Council . Retrieved from https://yoursay.murrayriver.nsw.gov.au/lsps
- NSW BioNet (2022) Species Sighting Search. Online resource retrieved from https://www.environment.nsw.gov.au/atlaspublicapp/UI_Modules/ATLAS_/AtlasSearch.aspx

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APPENDIX G DRAWINGS



 NOMINAL DIMENSIONS AS SHOWN ON DRAWING, SUBJECT TO CHANGE AS DESIGN PROCEEDS.

NEW MCL7 BUILDING

- LENGTH = 228.5m
- WIDTH = 25m
- FLOOR AREA = 5710 m^2

• NEW MCL7 WAREHOUSE (DESPATCH BUILDING)

- LENGTH = 108m WIDTH = 27.5m
- FLOOR AREA = 2970m^2

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ELEVATION A-A



ELEVATION VIEW LOOKING NORTH-EAST

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