

Mr Stephen Richardson
Director
Cowman Stoddart Pty Ltd
Suite 14, 31 Kinghorne Street
NOWRA NSW 2541

21/10/2021

Dear Mr Richardson,

**Shoalhaven Starches - Gas Pipeline (MP10_0144-Mod-1)
Request for Additional Information**

I refer to the modification request for Shoalhaven Starches – Gas Pipeline (MP10_0144-Mod-1). The Department of Planning, Industry and Environment (Department) has reviewed the modification request. After careful consideration, the Department is requesting that you provide additional information that effectively addresses the issues in **Attachment 1**.

At the time of writing, the Department has not received responses from Shoalhaven City Council (Council), Department of Primary Industries, Natural Resources Access Regulator, Transport for NSW and Sydney Trains. Any advice received from Council and the aforementioned public authorities will be forwarded to you upon receipt.

The Department requests you provide a response to any issues raised in the advice expected from Council and the abovementioned government agencies.

You are requested to provide the information, or notification that the information will not be provided, to the Department by **Thursday 18 November 2021**. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Thomas Bertwistle, who can be contacted on 02 8275 1025 or at Thomas.Bertwistle@planning.nsw.gov.au.

Yours sincerely,



Joanna Bakopanos
Team Leader
Industry Assessments

Attached: Attachment 1 – Department's Comments

ATTACHMENT 1
Department's Comments

Hazards

1. The maximum release rate of natural gas in section 5.1 of the Preliminary Hazard Analysis (PHA) is evaluated at 256 kg/s. However, in Table 3, a natural gas flowrate of 287 kg/s is used. Furthermore, the Hazard Analysis performed in 2011 (Hazard Analysis, Manildra Bomaderry Pipeline, URS Australia, Pinnacle Risk Management, Revision B, 7 March 2011) estimated the release rate at 286 kg/s for a smaller pipe diameter. Please clarify the assumptions and methodology used to estimate the release rate for the modification and confirm whether appropriate release rate has been considered for the consequence analysis.
2. In reviewing Table 7 of the PHA, it appears that the intent is to establish maximum individual risk from the pipeline and verify it would comply with the risk criteria for surrounding land uses. However, the methodology adopted could potentially under-estimate the risk as it only considers larger hole sizes. In addition, the directional consideration assumption may be optimistic. The Department suggests identifying a residence that is closest to the pipeline with assessment of the potential individual risk at this point. This approach should consider all hole sizes of releases that may reach to this residence.
3. In addition to point 2 above, the directional consideration may be difficult to establish using a spreadsheet model. The Department considers that the analysis should adopt a conservative assumption by not using directional considerations. If directional consideration is required, a realistic and conservative assumption that is relevant for the event should be adopted.
4. The relocation of the Gas Pressure Reduction Facility (GPRF) closer to Bolong Road decreases the separation distances to surrounding areas. Noting that the GPRF is now closer to the distillation plant, the PHA must demonstrate that the consequence of events associated with the GPRF meet the risk criteria in Hazardous Industry Planning Advisory Paper No.4 and that propagation risks are met.