



Planning & Infrastructure

Contact: Andrew Hartcher
Phone: 02 9228 6503
Fax: 02 9228 6466
Email: andrew.hartcher@planning.nsw.gov.au

Our ref: SSD-4953
File: 11/18423

Mr Nathaniel Murray
Planning Consultant
McKenzie Group Consulting Planning (NSW) Pty Ltd
Level 6, 189 Kent Street
SYDNEY NSW 2000

3 November 2011

Dear Mr Murray

State Significant Development - Director General's Requirements Erskine Park Chemical Storage Facility (SSD-4953)

I have attached the Director General's requirements (DGRs) for the proposed Erskine Park Chemical Storage Facility.

These requirements have been prepared in consultation with the relevant government agencies (see attachment 2), and are based on the information you have provided to date. Please note that the Director-General may alter these requirements at any time, and that these requirements will expire if you do not lodge a development application (DA) and environmental impact statement (EIS) for the proposed facility within the next two years.

The Department will review the EIS for the proposed facility carefully before putting it on public exhibition, and will require you to submit an amended EIS if it does not adequately address the DGRs.

If the proposed facility is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval would be in addition to any approvals required under NSW legislation and it is your responsibility to contact the Department of Sustainability, Environment, Water, Population and Communities to determine if an approval under the EPBC Act is required for your development (<http://www.environment.gov.au> or 6274 1111).

I would appreciate it if you would contact the Department at least two weeks before you propose to submit the DA and EIS for the proposed facility.

If you have any enquiries about these requirements, please contact Andrew Hartcher on 02 9228 6503 or via email at andrew.hartcher@planning.nsw.gov.au.

Yours sincerely

David Kitto
Director
Mining & Industry Projects
as delegate of the Director-General

Director General's Environmental Assessment Requirements

Section 78A(8A) of the *Environmental Planning and Assessment Act*

State Significant Development

Application Number	SSD-4953
Development	The Erskine Park Chemical Storage Facility which includes the proposed use of an approved warehouse building for the storage and distribution of chemicals including some classified as dangerous goods. The proposal specifically includes including ancillary fit-out, signage and associated infrastructure.
Location	Building B1, 23-107 Erskine Park Road, Erskine Park (Lot 1 DP 1128233) in the Penrith local government area.
Applicant	Prime Constructions
Date of Issue	3 November 2011
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>
Key issues	The EIS must address the following specific matters: • Hazards and Risks – including an assessment of the hazards and risks associated with the proposal and the existing operations on site (and the potential for off site impacts) including details of hazardous materials used or kept on the premises during operation. The EIS shall also include a screening of potential hazards on and off site to determine the potential for off site impacts and any requirement for a Preliminary Hazard Analysis (PHA). Should potential off-site impacts be identified, a PHA must be prepared in accordance with the Department's <i>Hazardous Industry Planning Advisory Paper No. 6 Hazard analysis and Multi-level Risk Assessment</i>. The PHA should: – consider the risks from the facility (including traffic risks and cumulative risks, see below); and – demonstrate that the proposal would comply with the criteria set out in <i>Hazardous Industry Planning Advisory Paper No 4 Risk Criteria for Land Use Safety Planning</i>. • Strategic and Statutory Context – including: – detailed justification for the proposal and suitability of the site to be developed; and – demonstration that the proposal is generally consistent with all relevant environmental planning instruments (e.g. the NSW State Plan, Metropolitan Strategy and draft subregional strategy), development control plans (DCPs), and justification for any inconsistencies. • Infrastructure – demonstrating that suitable arrangements are in place to provide the necessary local and regional infrastructure for the proposal; • Transport, Access and Parking – including: – predictions of the traffic volumes likely to be generated during fit-out and operation;

	– an assessment of the impacts of this traffic on the safety, capacity and efficiency of the surrounding road network, including details of truck routes and modelling of key intersections; – detailed plans of any proposed road upgrades; – access, including detailed consideration of various access options and justification for the proposed location of the main access points; – details of the availability of non-car travel modes and measures to encourage greater use of these travel modes; and – parking. • Air – including odour during operations and measures to reduce greenhouse gas emissions on-site; • Noise – during fit-out and operations including traffic noise; • Water – details of water supply, wastewater disposal (if any) and stormwater management during operation; • Waste – including: – identification of the quantity and type of waste that would be handled, stored, processed or disposed of at the facility; and – a description of how this waste would be stored and handled on site, and transported to and from the site. • Design – including details of building design and fit-out for handling of chemicals (e.g. bunding and tanker loading/unloading areas); • Fire and incident management – including technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill cleanup equipment and fire management and containment measures; and • Cumulative impacts – particularly in relation to hazards and risk associated with other nearby dangerous goods storage/major hazards facilities, air, noise and traffic.
Consultation	During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: • Office of Environment and Heritage; • Roads and Traffic Authority; • Penrith City Council; and • WorkCover NSW. The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, the following attachment contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this project.

ATTACHMENT 1

Technical and Policy Guidelines

The following guidelines may assist in the preparation of the Environmental Impact Statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:

<http://www.planning.nsw.gov.au>

<http://www.bookshop.nsw.gov.au>

<http://www.publications.gov.au>

Policies, Guidelines and Plans

Aspect	Policy /Methodology
Hazard and Risk	AS/NZS 4360:2004 Risk Management HB 203:2006 Environmental Risk Management – Principals and Process State Environmental Planning Policy No 33– Hazardous and Offensive Development (SEPP 33) Planning Advisory Paper No. 6 – Guidelines for Hazardous Analysis (DUAP) Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning (DUAP) Planning Advisory Paper No. 10 – Land Use Safety Planning (DUAP) Planning Advisory Paper No. 11 – Route Selection (DUAP)
Transport	Guide to Traffic Generating Development (RTA) Road Design Guide (RTA)
Air Quality	Protection of the Environment Operations (Clean Air) Regulations 2010 Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (DEC) Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC)
Odour	Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (DEC) Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
Greenhouse Gas	National Greenhouse Accounts (NGA) Factors
Noise	NSW Industrial Noise Policy (DECC) NSW Road Noise Policy (OEH) Interim Construction Noise Guideline (DECC)
Water	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ) National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)

Surface Water

	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) (EPHC, NRMMC & AHMC)
	Managing Urban Stormwater: Council Handbook. Draft (EPA)
	Managing Urban Stormwater: Treatment Techniques (EPA)
	Managing Urban Stormwater: Source Control. Draft (EPA)
	Managing Urban Stormwater: Soils & Construction (Landcom)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (DEC)
	Floodplain Risk Management Guideline: Practical Consideration of Climate Change (DECC)
<i>Groundwater</i>	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	NSW State Groundwater Policy Framework Document (DLWC)
	NSW State Groundwater Quality Protection Policy (DLWC)
	NSW State Groundwater Quantity Management Policy (DLWC) Draft
	The NSW State Groundwater Dependent Ecosystem Policy (DLWC)
	Guidelines for the Assessment and Management of Groundwater Contamination (DECC) Draft
Waste	
	Waste Avoidance and Resource Recovery Strategy (Resource NSW)
	Waste Classification Guidelines (DECC)
	Protection of the Environment Operations (Waste) Regulations 2005

ATTACHMENT 2
Government Authority Responses to Request for Key Issues



1 November 2011

Your Reference: 8996
Our Reference: 11M2366 SYD11/00890

The Director
Major Development Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Attention: Andrew Hartcher

**REQUEST FOR KEY ISSUES FOR DIRECTOR-GENERALS REQUIREMENTS – STATE
SIGNIFICANT DEVELOPMENT – CHEMICAL STORAGE FACILITY, ERSKINE PARK**

Dear Sir/Madam,

Reference is made to the Department's correspondence dated 11 October 2011, requesting the Roads and Traffic Authority (RTA) to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the Director General's Environmental Assessment (EA) requirements.

The RTA would like the following issues to be included in the transport and traffic impact assessment of the proposed development:

1. Details of the anticipated route of trucks through the local road network, if any;
2. An assessment of the potential increase in toxicity levels of loads transported on arterial and local roads and consequently, the preparation of an incident management strategy for accidents, if relevant.

If you wish to discuss this matter further, please contact the undersigned on (02) 8849 2012.

Regards,

Owen Hodgson
Senior Land Use Planner
Land Use Planning and Assessment Unit
Transport Planning, Sydney Region

Roads & Maritime Services

Andrew Hartcher - State Significant Development Proposal - Chemical Storage Facility at 23-107 Erskine Park Road, Erskine Park

From: "Shephard Tania" <tshephard@penrithcity.nsw.gov.au>
To: <andrew.hartcher@planning.nsw.gov.au>
Date: 10/31/2011 10:26 AM
Subject: State Significant Development Proposal - Chemical Storage Facility at 23-107 Erskine Park Road, Erskine Park

Hi Andrew,

Re: Key Issues and Assessment Requirements

State Significant Development Proposal – Chemical Storage Facility at 23-107 Erskine Park Road, Erskine Park

I refer to your letter 11 October 2011. I note the draft DGRs provided by the Department and attached to your letter. Generally, Council is satisfied that the draft DGRs address key issues. However, Council provides the following additional comments with respect to key issues and assessment requirements:

- The site is zoned General Industrial IN1 under the provisions of SEPP 2009 – Western Sydney Employment Area. The application is to address the relevant provisions of this plan.
- The site is affected by the provisions of SREP 20 – Hawkesbury Nepean River. The application is to address the relevant provisions of this plan.
- The proposed development triggers the provisions of SEPP 33 – Hazardous and Offensive Development. The application is to demonstrate, through a Preliminary Hazard Analysis, that the development is neither "hazardous" nor "offensive" as defined under SEPP 33.
- The site is affected by the provisions of Penrith DCP 2006. The application is to address the relevant sections of this DCP. (Section 2.9 – Waste Planning and Section 6.10 – Erskine Business Park)
- Noise impacts from the development will need to be addressed, including noise generation from truck movements. The site is in close proximity to existing residential development to the north and details as to the hours of operations, the nature of operations and all truck movements (including loading/unloading operations) are to be addressed. An acoustic report is required in this regard.
- A consideration of traffic impacts both on site and off site will be undertaken.
- As noted, the potential for any air impacts, including odours is to be addressed. Again, the proximity of nearby residential areas is noted.
- The site is located adjoining the bio-diversity corridor which contains a watercourse. Any potential impacts on this watercourse should be considered. Impacts may result from chemical spills and clean-up operations and details as to the management of spills is to be provided.
- Details as to the type of waste generated by the development, and the method of waste storage and collection, are to be provided. A waste management plan is to accompany the application.
- The site is identified as being affected by bushfire risk. This is of relevance when considering safety measures for the storage of hazardous goods.

I can be contacted on 47327960 should you have any further enquiries.

Regards,

Tania Shephard

Principal Planner

Penrith City Council

T: (02) 4732 7960

E: tshephard@penrithcity.nsw.gov.au



**Office of
Environment
& Heritage**



Your Reference
Our reference : FI08/189-03
Contact : Rod Fox on 9995 6839

Ms F Greenway
Team Leader - Industry
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Ms Greenway

**RE: Request for Key Issues and Assessment Requirements
State Significant Development Proposal – Erskine Park Chemical Storage Facility at 23-
107 Erskine Park Road, Erskine Park NSW**

I refer to your request for the Office of Environment and Heritage's (OEH's) requirements for the Key issues and Assessment Requirements' in regard to the above proposal dated 11 October 2011.

OEH has considered the details of the proposal as provided by the Department of Planning and Infrastructure and has identified the information it requires to issue its general terms of approval in Attachment A. In summary, OEH's key information requirements for the proposal are:

1. potential air quality impacts on neighbouring properties,
2. potential impacts of noise over the life of the development,
3. water pollution implications,
4. waste generation, storage and management on site,
5. bunding design specifications for the storage and handling, of all chemicals on the premises,
6. bunding design specification for tanker/vehicle unloading/loading areas for chemicals,
7. details of all pollution control equipment to minimise water, air and noise pollution,
8. cumulative impacts on sensitive receivers from existing and proposed activities, and
9. cumulative impacts of similar activities locally and regionally.

Notwithstanding the above, and provided that the proposal is approved by the determining authority, the proponent must apply for and obtain Environment Protection Licence (licence) from OEH to operate the facility.

The Department of Environment, Climate Change and Water is now known as the Office of Environment and Heritage, Department of Premier and Cabinet

I hope the above information is helpful to you, however, if you wish to discuss the matter further, please contact Mr Rod Fox on (02) 9995 6839.

Yours sincerely

 17 Oct 2011

KIERAN HORKAN
Unit Head Sydney Industry
Environment Protection and Regulation

Attachment A

**OEH's Recommended Director
General's Requirements**

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1 Environmental impacts of the project

1. Impacts related to the following environmental issues need to be assessed, quantified and reported on:
 - Air Issues
 - air quality
 - greenhouse gas
 - Noise and vibration
 - Waste including hazardous materials and radiation
 - Waste DGRs for waste facilities
 - General waste – any proposal
 - Chemicals subject to Chemical Control Orders
 - Hazardous materials and radiation
 - Water and Soils
 - Acid sulfate soils
 - Contaminated sites
 - Soils - general
 - Water quality

Environmental Impact Assessments (EISs) should address the specific requirements outlined under each heading below and assess impacts in accordance with the relevant guidelines mentioned. A full list of guidelines is at **Attachment B**.

2 Licensing requirements

1. On the basis of the information submitted to date, it appears that the proposal is a scheduled activity under the *Protection of the Environment Operations Act 1997* (POEO Act) and will therefore require an Environment Protection Licence (EPL) if approval is granted. The EIS should address the requirements of Section 45 of the POEO Act determining the extent of each impact and providing sufficient information to enable OEH to determine appropriate limits for the EPL.
2. Should project approval be granted, the proponent will need to make a separate application to OEH for an EPL. The Proponent cannot carry out its operation on the premises until the EPL is granted. Additional information is available through the *OEH Guide to Licensing* document (www.environment.nsw.gov.au/licensing/licenceguide.htm).

SPECIFIC ISSUES

3 Air issues

3.1 Air quality

The EIS should include a detailed air quality impact assessment (AQIA). The AQIA should:

1. Assess the risk associated with potential discharges of fugitive and point source emissions for all stages of the proposal. Assessment of risk relates to environmental harm, risk to human health and amenity.
2. Justify the level of assessment undertaken on the basis of risk factors, including but not limited to:
 - a. proposal location;
 - b. characteristics of the receiving environment; and
 - c. type and quantity of pollutants emitted.
3. Describe the receiving environment in detail. The proposal must be contextualised within the receiving environment (local, regional and inter-regional as appropriate). The description must include but need not be limited to:
 - a. meteorology and climate;
 - b. topography;
 - c. surrounding land-use; receptors; and
 - d. ambient air quality.
4. Include a detailed description of the proposal. All processes that could result in air emissions **must be identified and described, including all air pollution control equipment**. Sufficient detail to accurately communicate the characteristics and quantity of all emissions must be provided.
5. Include a consideration of 'worst case' emission scenarios and impacts at proposed emission limits.
6. Account for cumulative impacts associated with existing emission sources as well as any currently approved developments linked to the receiving environment.
7. Include air dispersion modelling where there is a risk of adverse air quality impacts, or where there is sufficient uncertainty to warrant a rigorous numerical impact assessment. Air dispersion modelling must be conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2005)
<http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf>.
8. Demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations (POEO) Act* (1997) and the *POEO (Clean Air) Regulation* (2010).
9. Provide an assessment of the project in terms of the priorities and targets adopted under the NSW State Plan and its implementation plan Action for Air.
10. Detail emission control techniques/practices that will be employed by the proposal.

3.2 Greenhouse gas

1. The EIS should include a comprehensive assessment of, and report on, the project's predicted greenhouse gas emissions (tCO₂e). Emissions should be reported broken down by:
 - a) direct emissions (scope 1 as defined by the Greenhouse Gas Protocol – see reference below),
 - b) indirect emissions from electricity (scope 2), and
 - c) upstream and downstream emissions (scope 3)

before and after implementation of the project, including annual emissions for each year of the project (construction, operation and decommissioning).

2. The EIS should include an estimate of the greenhouse emissions intensity (per unit of production). Emissions intensity should be compared with best practice if possible.
3. The emissions should be estimated using an appropriate methodology, in accordance with NSW, Australian and international guidelines (see below).
4. The proponent should also evaluate and report on the feasibility of measures to reduce greenhouse gas emissions associated with the project. This could include a consideration of energy efficiency opportunities or undertaking an energy use audit for the site.

Guidance Material

- The Greenhouse Gas Protocol: Corporate Standard, World Council for Sustainable Business Development & World Resources Institute
<http://www.ghgprotocol.org/standards/corporate-standard>
- National Greenhouse Accounts (NGA) Factors, Australian Department of Climate Change (Latest release),
<http://www.climatechange.gov.au/publications/greenhouse-acctg/national-greenhouse-factors.aspx>
- National Greenhouse and Energy Reporting System, Technical Guidelines (latest release) <http://www.climatechange.gov.au/en/government/initiatives/national-greenhouse-energy-reporting/tools-resources.aspx>
- National Carbon Accounting Toolbox
<http://www.climatechange.gov.au/government/initiatives/ncat.aspx>
- Australian Greenhouse Emissions Information System (AGEIS)
<http://ageis.climatechange.gov.au/>

4 Noise and vibration

1. In relation to noise, the following matters should be addressed (where relevant) as part of the EIS.

General

2. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (OEH, 2009).
<http://www.environment.nsw.gov.au/noise/constructnoise.htm>
3. Vibration from all activities (including construction and operation) to be undertaken on the premises should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (OEH, 2006).
<http://www.environment.nsw.gov.au/noise/vibrationguide.htm>
4. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990).
<http://www.environment.nsw.gov.au/noise/blasting.htm>

Industry

5. Operational noise from all industrial activities (including private haul roads and private railway lines) to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Industrial Noise Policy* (EPA, 2000) and *Industrial Noise Policy Application Notes*.
<http://www.environment.nsw.gov.au/noise/industrial.htm>

Road

6. Noise on public roads from increased road traffic generated by land use developments should be assessed using the guidelines contained in the *Environmental Criteria for Road Traffic Noise* (EPA, 1999).
<http://www.environment.nsw.gov.au/noise/traffic.htm>
7. Noise from new or upgraded public roads should be assessed using the *Environmental Criteria for Road Traffic Noise* (EPA, 1999).
<http://www.environment.nsw.gov.au/noise/traffic.htm>

5 Waste, chemicals and hazardous materials/radiation

5.1 General waste – any proposal

The EIS should:

1. Include a detailed plan for in-situ classification of waste material, including the sampling locations and sampling regime that will be employed to classify the waste, particularly with regards to the identification of contamination hotspots.
2. Identify, characterise and classify all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste.

Note: All waste must be classified in accordance with *OEH's Waste Classification Guidelines*.

3. Identify, characterise and classify all waste that is proposed to be disposed of to an offsite location, including proposed quantities of the waste and the disposal locations for the waste. This includes waste that is intended for re-use or recycling.
Note: All waste must be classified in accordance with *OEH's Classification Guidelines*.

4. Include a commitment to retaining all sampling and classification results for the life of the project to demonstrate compliance with *OEH's Waste Classification Guidelines*.

5. Provide details of how waste will be handled and managed onsite to minimise pollution, including:

a) Stockpile location and management

- Labelling of stockpiles for identification, ensuring that all waste is clearly identified and stockpiled separately from other types of material (especially the separation of any contaminated and non-contaminated waste).
- Proposed height limits for all waste to reduce the potential for dust and odour.
- Procedures for minimising the movement of waste around the site and double handling.
- Measures to minimise leaching from stockpiles into the surrounding environment, such as sediment fencing, geofabric liners etc.

- b) Erosion, sediment and leachate control including measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site during works. The EIS should show the location of each measure to be implemented. The Proponent should consider measures such as:

- Sediment traps
- Diversion banks
- Sediment fences
- Bunds (earth, hay, mulch)
- Geofabric liners

- Other control measures as appropriate

The Proponent should also provide details of:

- how leachate from stockpiled waste material will be kept separate from stormwater runoff;
 - treatment of leachate through a wastewater treatment plant (if applicable); and
 - any proposed transport and disposal of leachate off-site.
6. Provide details of how the waste will be handled and managed during transport to a lawful facility. If the waste possesses hazardous characteristics, the Proponent must provide details of how the waste will be treated or immobilised to render it suitable for transport and disposal.
 7. Include details of all procedures and protocols to be implemented to ensure that any waste leaving the site is transported and disposed of lawfully and does not pose a risk to human health or the environment.
 8. Include a statement demonstrating that the Proponent is aware of OEHL's requirements with respect to notification and tracking of waste.
 9. Include a statement demonstrating that the Proponent is aware of the relevant legislative requirements for disposal of the waste, including any relevant Resource Recovery Exemptions, as gazetted by OEHL from time to time.
 10. Outline contingency plans for any event that affects operations at the site that may result in environmental harm, including: excessive stockpiling of waste, volume of leachate generated exceeds the storage capacity available on-site etc.

5.2 Chemicals subject to Chemical Control Orders

1. The EIS must demonstrate how the Proponent will manage all materials and wastes containing scheduled chemical waste, dioxin and/or polychlorinated biphenyls (PCBs) in accordance with the applicable Chemical Control Order, National Management Plan or in accordance with a licence under the EHC Act.
2. Where a project involves any processing or treatment of scheduled chemicals, the proponent must provide OEHL with sufficient and appropriate documentation for a technology assessment to be undertaken by the OEHL, in accordance with the following:
 - 'National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994'; and
 - 'National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994'.

6 Water and soils

6.1 Acid sulfate soils

1. The potential impacts of the development on acid sulfate soils must be assessed in accordance with the relevant guidelines in the *Acid Sulfate Soils Manual* (Stone *et al.* 1998) and the *Acid Sulfate Soils Laboratory Methods Guidelines* (Ahern *et al.* 2004).
2. Describe mitigation and management options that will be used to prevent, control, abate or minimise potential impacts from the disturbance of acid sulfate soils associated with the project and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

6.2 Water

Describe Proposal

1. Describe the proposal including position of any intakes and discharges, volumes, water quality and frequency of all water discharges.
2. Demonstrate that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.
3. Where relevant include a water balance for the development including water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

Background Conditions

4. Describe existing surface and groundwater quality. An assessment needs to be undertaken for any water resource likely to be affected by the proposal.
5. State the Water Quality Objectives for the receiving waters relevant to the proposal. These refer to the community's agreed environmental values and human uses endorsed by the NSW Government as goals for ambient waters (<http://www.environment.nsw.gov.au/ieo/index.htm>). Where groundwater may be impacted the assessment should identify appropriate groundwater environmental values.
6. State the indicators and associated trigger values or criteria for the identified environmental values. This information should be sourced from the ANZECC (2000) Guidelines for Fresh and Marine Water Quality (http://www.mincos.gov.au/publications/australian_and_new_zealand_guidelines_for_fresh_and_marine_water_quality).

7. State any locally specific objectives, criteria or targets which have been endorsed by the NSW Government.

Impact Assessment

8. Describe the nature and degree of impact that any proposed discharges will have on the receiving environment.
9. Assess impacts against the relevant ambient water quality outcomes. Demonstrate how the proposal will be designed and operated to:
 - o protect the Water Quality Objectives for receiving waters where they are currently being achieved; and
 - o contribute towards achievement of the Water Quality Objectives over time where they are not currently being achieved.
10. Where a discharge is proposed that includes a mixing zone, the proposal should demonstrate how wastewater discharged to waterways will ensure the ANZECC (2000) water quality criteria for relevant chemical and non-chemical parameters are met at the edge of the initial mixing zone of the discharge, and that any impacts in the initial mixing zone are demonstrated to be reversible.
11. Assess impacts on groundwater and groundwater dependent ecosystems.
12. Describe how stormwater will be managed both during and after construction.

Monitoring

13. Describe how predicted impacts will be monitored and assessed over time.

Bunding Specifications

14. Details/specifications of all bunded areas to store, blend and process liquids or chemicals to contain spillages.
15. Details/specifications of all tanker loading/unloading areas. It should be noted that these areas must be designed such that they are not impacted upon by rainwater.

Attachment B – Guidance Material

Title	Web address
<u>Relevant Legislation</u>	
<i>Contaminated Land Management Act 1997</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+140+1997+cd+0+N
<i>Environmentally Hazardous Chemicals Act 1985</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+14+1985+cd+0+N
<i>Environmental Planning and Assessment Act 1979</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
<i>Protection of the Environment Operations Act 1997</i>	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
<u>Licensing</u>	
OEH Guide to Licensing	www.environment.nsw.gov.au/licensing/licenceguide.htm
<u>Air Issues</u>	
Air Quality	
Approved methods for modelling and assessment of air pollutants in NSW (2005)	http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf
POEO (Clean Air) Regulation 2010	http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+428+2010+cd+0+N
Greenhouse Gas	
The Greenhouse Gas Protocol: Corporate Standard, World Council for Sustainable Business Development & World Resources Institute	http://www.ghgprotocol.org/standards/corporate-standard
National Greenhouse Accounts (NGA) Factors, Australian Department of Climate Change (Latest release),	http://www.climatechange.gov.au/publications/greenhouse-acctg/national-greenhouse-factors.aspx
National Greenhouse and Energy Reporting System, Technical Guidelines (latest release)	http://www.climatechange.gov.au/en/government/initiatives/national-greenhouse-energy-reporting/tools-resources.aspx
National Carbon Accounting Toolbox	http://www.climatechange.gov.au/government/initiatives/ncat.aspx
Australian Greenhouse Emissions Information System (AGEIS)	http://ageis.climatechange.gov.au/
<u>Noise and Vibration</u>	
Interim Construction Noise Guideline (OEH, 2009)	http://www.environment.nsw.gov.au/noise/constructnoise.htm
Assessing Vibration: a technical guideline (OEH, 2006)	http://www.environment.nsw.gov.au/noise/vibrationguide.htm
Australian and New Zealand Environment Council – Technical basis	http://www.environment.nsw.gov.au/noise/blasting.htm

Title	Web address
for guidelines to minimise annoyance due to blasting overpressure and ground vibration (ANZEC, 1990)	
Industrial Noise Policy Application Notes	http://www.environment.nsw.gov.au/noise/traffic.htm
Environmental Criteria for Road Traffic Noise (EPA, 1999)	http://www.environment.nsw.gov.au/noise/traffic.htm
<u>Waste, Chemicals and Hazardous Materials and Radiation</u>	
Waste	
Environmental Guidelines: Solid Waste Landfills (EPA, 1996)	http://www.environment.nsw.gov.au/resources/waste/envguidlns/solidlandfill.pdf
Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.environment.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
Waste Classification Guidelines (OEHL, 2008)	http://www.environment.nsw.gov.au/waste/envguidlns/index.htm
OEHL Resource recovery exemption	http://www.environment.nsw.gov.au/waste/RRecoveryExemptions.htm
Chemicals subject to Chemical Control Orders	
Chemical Control Orders (regulated through the EHC Act)	http://www.environment.nsw.gov.au/pesticides/CCOs.htm
National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
<u>Water and Soils</u>	
Acid sulphate soils	
Acid Sulfate Soils Planning Maps	http://canri.nsw.gov.au/download/
Acid Sulfate Soils Manual (Stone et al. 1998)	Manual available for purchase from: http://www.landcom.com.au/whats-new/the-blue-book.aspx Chapters 1 and 2 are on DoP's Guidelines Register at: Chapter 1 Acid Sulfate Soils Planning Guidelines: http://www.planning.nsw.gov.au/rdaguidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Planning%20Guidelines.pdf Chapter 2 Acid Sulfate Soils Assessment Guidelines: http://www.planning.nsw.gov.au/rdaguidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Assessment%20Guidelines.pdf
Acid Sulfate Soils Laboratory Methods Guidelines (Ahern et al. 2004)	http://www.derm.qld.gov.au/land/ass/pdfs/lmg.pdf This replaces Chapter 4 of the Acid Sulfate Soils Manual above.
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.mincos.gov.au/publications/australian_and_new_zealand_guidelines_for_fresh_and_marine_water_quality

Title	Web address
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf



WorkCover NSW – Major Hazard Facilities Team
Level 4 1 Oxford Street, Darlinghurst, NSW 2010
PO Box 429, Darlinghurst, NSW 1300
mhf@workcover.nsw.gov.au
WorkCover Assistance Service 13 10 50
workcover.nsw.gov.au

Date: 17 October 2011
Our Ref: 2011/020004

Ms Felicity Greenway
Team Leader – Industry
Mining and Industry Projects
Department of Planning and Infrastructure
GPO Box 39
Sydney 2001



Dear Ms Greenway

State Significant Development Proposal – Erskine Park Chemical Storage Facility

Thank you for your letter dated 11 October 2011 requesting key issues and assessment requirements to be included in the Director-General's Requirements (DGRs) for the above proposal.

Based on information available to the Major Hazard Facilities Team, the proposed facility will be a Major Hazard Facility (MHF) under the Occupational Health and Safety Regulation 2001. Therefore the proponent is required to notify WorkCover of the intended maximum quantities of MHF related dangerous goods that may be stored on site. Upon reviewing the notification, WorkCover may provisionally register the MHF and issue conditions for registration. The amounts of MHF-related dangerous goods must not exceed MHF thresholds unless the facility is provisionally registered.

Given that the warehouse is nearing completion and this proposal is for the introduction of dangerous goods, it is essential that the proponent consults with WorkCover as early as possible to obtain the requirements.

It is noted that the "consultation requirements" in your draft DGRs require the proponent to consult with WorkCover NSW during the preparation of the EA. Subject to this requirement remaining in the final version of the DGRs, we do not have any additional requirements at this stage.

Should you have any queries, please contact Sohan Fernando on telephone 8281 6485 or e mail sohan.fernando@workcover.nsw.gov.au.

Yours sincerely

Jan Douglas
Manager
Major Hazards Facilities Team
WorkCover NSW