



DOC17/457943-02:CP

Pamela Morales
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Morales

**Modification Application for State Significant Development Application (SSD 5544 – MOD 3)
Caltex Kurnell Refinery Conversion Works - Tank 101 Demolition**

I am writing in reply to your email to the Environment Protection Authority (EPA) dated 6 September 2017 seeking comments on the above modification application and accompanying Statement of Environmental Effects (SEE).

On the basis of a review of the information provided and taking into consideration the existing approval conditions for the conversion project (SSD 5544), the EPA provides its comments on this application in the attachment to this letter (**Attachment A**). These comments relate to noise, air quality and waste management.

The EPA may have further comments on receipt and review of any additional information provided.

If you have questions regarding the above, please phone the contact officer on (02) 4224 4100.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P. Bloem', followed by the date '21/09/17' written in a similar style.

PETER BLOEM
Manager Regional Operations Illawarra
Environment Protection Authority

Contact officer: CRAIG PATTERSON
(02) 4224 4100

Attachment

Attachment A

1. Section 4.2 states that Tank 101 has already been cleaned and is currently empty awaiting demolition. Section ES1.12 and Table 12-2 identifies the major waste streams likely to be generated during the demolition works. The identified wastes do not include any hydrocarbon residues likely to be present in the tank as described in Section 8.4.1.1. Caltex should provide additional information to clarify whether there are any hydrocarbon residues remaining in the tank and how these residues (if any) will be managed.

The presence of hydrocarbon residues in the tank could also potentially change the assessments undertaken in the Statement of Environmental Effects. Caltex should consider the management of hydrocarbons residues in relation to the following:

- a) The air quality impact assessment does not appear to have considered potential emissions from any hydrocarbon residues that may remain in the tank. Table 10-2 provides a summary of key activities and air emission likely to be generated during the works. The potential for Volatile Organic Compounds (VOC) and odour emissions has only been identified for the excavation of contaminated soil and stockpiling activities.
 - b) The hazard and risk assessment provided in Section 12.1 may need to be revised to include potentially offensive odours and community complaints from Tank 101 demolition activities.
 - c) The waste management assessment in Section 12.2 may need to be revised to include hydrocarbon residues as a waste that needs to be managed.
2. Section 1.1 states that Tank 101 is located approximately 69 meters from the closest residential property. Section 9.4.2 states that the tank demolition works have the potential to generate exceedances of the established construction noise criteria at certain residential receivers during daytime hours. Caltex has committed to completing the demolition of this tank during daytime hours only. Caltex should also provide further advice on any additional reasonable and feasible mitigation and management measures that will be implemented to ensure that the noise generated does not exceed the project approval criteria. Caltex must be able to clearly demonstrate through appropriate noise monitoring that it is complying with the project approval limits during the demolition activities.

As indicated in its management and mitigation measures, Caltex should implement appropriate respite periods during high noise generating or prolonged activities to minimise potential noise impacts.