

## Bianca Thornton

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**From:** Coote, David <David.Coote@safework.nsw.gov.au>  
**Sent:** Tuesday, 6 September 2016 5:58 PM  
**To:** Bianca Thornton  
**Cc:** Fernando, Sohan  
**Subject:** Botany Industrial Park Subdivision (DA 30/98 MOD 3) - Notification

### Security Classification: UNCLASSIFIED

Dear Bianca,

Comments as requested from SWNSW:

1. The plan attached to the Orica letter dated 4/8/16 shows that Orica intends to separate out some lots. In this case, any new occupant(s) of the separated out lots may potentially be much closer to the CAP, GTP and HCB, than any third parties previously have. The risks posed by activities of any new occupant to current BIP operations (and vice versa) will potentially be higher than that between the current sites within the BIP.  
This would potentially include the security risks of addition occupants.  
The current BIP arrangement appears to be that the risks posed from one operator to another within the BIP do not have to comply with the HIPAP 4 individual fatality risk criteria at boundary of industrial site of 50E-6.  
It is suggested that planning give consideration as to how these risks are to be addressed and how a potential new occupant will be made aware of the risks posed by activities within the BIP.
2. We note that the BIP QRA, on the DoP website, has an apparent inconsistency.  
Table 7.2 shows the failure rate for a catastrophic failure of a single drum (of approx. 1 tonne capacity). However Table 7.5 does not show the corresponding scenario. Ixom have stated by email that the scenario is included in the QRA. SWNSW will wish to sight the relevant documents.

Comments already given to planning by email on 31 Aug 2016:

Issues that you may wish to consider and then possibly include a condition that the subdivision must not result in:

1. the blocking of any existing internal BIP access and egress paths for access by the emergency services such as the fire brigades, and escape paths for employees, or
2. placing of anything in the way of emergency response, eg, storing shipping containers adjacent to the MHF site (which would limit emergency response)

without the agreement of the emergency services and other relevant agencies.

If you have any questions please contact us.

Regards,  
David

**David Coote**

**Senior Safety Analyst | Hazardous Chemical Services | Work Health & Safety Division**  
SafeWork NSW  
Level 1, 2 Burbank Place, Baulkham Hills NSW 2153  
T 02 8867 2816 E [David.Coote@safework.nsw.gov.au](mailto:David.Coote@safework.nsw.gov.au)



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