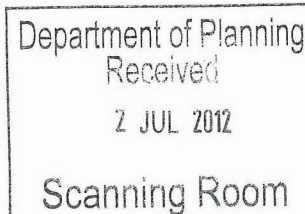




Your reference 06_0037 MOD 3
Our reference: DOC12/25870
Our contact: Dana Alderson 9995 6851

Mr David Rohloff
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001



Dear Mr Rohloff

Response to Submissions

Modification Request for Marine Refuelling and Supply Facility, White Bay Berth 6 (06_0037 MOD 3)

I refer to the response to submissions received for the modification request for the approved marine refuelling and supply facility located at White Bay Berth 6 (the site) received by the Environment Protection Authority (EPA) on 15 June 2012.

The EPA has reviewed the *White Bay Berth 6 – Modification 3 (06_0037 MOD 3) – Response to Submissions* prepared by AECOM and dated 14 June 2012 (Response to Submissions) and provides the following comments.

Water treatment

With respect to water treatment, the EPA notes that water from the wash down bay would not be processed by the existing water treatment facility, rather water would be collected in holding tanks beneath the wash down bay and filtered and settled before being discharged to sewer under a trade waste agreement with Sydney Water. The details of the existing water treatment facility for the site were not provided in the Response to Submissions.

The Response to Submissions does not include information about the capacity of the water treatment system for the wash down bay or the existing waste water treatment system to treat water containing contaminants associated with antifouling activities including marine organisms and antifouling paint residues and flakes, as requested in the EPA's letter dated 7 June 2012.

However, the applicant has indicated that they will enter into a trade waste agreement with Sydney Water for the discharge of waste water associated with antifouling activities to the sewer system. Therefore, the EPA recommends that the Department of Planning and Infrastructure (DOPI) consider imposing a condition of consent requiring the applicant enter into a trade waste agreement with Sydney Water prior to discharge of wastewater to the sewer.

Air and odour

In relation to air and odour emissions from the proposed antifouling activities, the EPA notes that the applicant has provided additional information which indicates that the extent of paint removal and painting activities will be limited and low Volatile Organic Compound (VOC) paints will be utilised. As outlined in the

EPA's letter dated 7 June 2012, the EPA considers that best practice for new facilities is represented by a dedicated enclosed workshop for spray painting and sanding activities with an appropriate ventilation, filtration and extraction system. Notwithstanding this, the additional information provided indicates that the scale of antifouling activities proposed will be limited and as such, the EPA considers that impacts from antifouling activities can be managed by way of the controls and limitations outlined in the Response to Submissions. Consequently, the EPA recommends that the DOPI considers including conditions of consent which place limitations on the scale of paint removal and painting activities to ensure the impacts of the activities are consistent with the levels considered in the revised information.

Environment Protection Licence

The EPA has received an application for an Environment Protection Licence (EPL) for the site and is currently processing this application. It would be appreciated if the DOPI could provide a copy of the amended conditions of consent promptly after consent is given in order for any relevant changes to the consent conditions to be reflected in the EPL for the site.

Please contact Dana Alderson on 9995 6851 if you have any queries regarding this letter.

Yours sincerely



27/6/12

ROSS FOX
A/Manager Sydney Industry
Environment Protection Authority