

Subject: FW: SSD-6619-Mod-1 Enirigi Battery Recycling Facility

From: Abe Lau <abe.lau@safework.nsw.gov.au>

Sent: Friday, 20 December 2019 3:47 PM

To: Katelyn Symington <Katelyn.Symington@planning.nsw.gov.au>

Cc: Nicholas Hon <Nicholas.Hon@planning.nsw.gov.au>; Ellen Luu <Ellen.Luu@planning.nsw.gov.au>; Bruce Zhang <Bruce.Zhang@planning.nsw.gov.au>; Phillip Cantrell <Phillip.Cantrell@safework.nsw.gov.au>; Aklesh Nand <Aklesh.Nand@safework.nsw.gov.au>

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Re: SSD-6619-Mod-1 Enirigi Battery Recycling Facility

Hello Katelyn,

Thank you for inviting SafeWork NSW to comment on the development proposal submission. Please find some specific comments as follows:

- The documents provided described processes involving lead which provide feasible risk of lead exposure to workers. With little further detail to describe the proposed controls to manage this risk SafeWork would take this opportunity to highlight several legal duties under the Work Health and Safety legislation:
 - o [Part 7.2 \(clauses 392-418\) of the Work Health and Safety Regulation 2017](#) (WHS Reg) is dedicated specifically to Lead processes in the workplace and legal duties of the PCBU (person conducting a business or undertaking) to manage these risks. These include (but is not limited by):
 - Provision of health monitoring to workers undertaking Lead Risk Work
 - Duty to remove worker from lead risk work, and
 - Control of lead risk by applying the [Hierarchy of control measures](#)
 - o Other WHS matters which may require more clarification in the future include:
 - The storage, use and production of flammable gases (eg LPG, hydrogen) means a thorough Hazardous Area Assessment should be development by a competent person, which will produce recommendations for appropriate controls.
 - The storage and handling of sulphuric acid should be reviewed carefully and appropriate control measures and safety devices be considered for implementation.

This is by no means an exhaustive list, rather some broad areas of concern from our perspective which did not appear to be addressed in the documentation provided. Should we be able to provide any further assistance, please do not hesitate to contact us.

Regards,

Abe Lau

Principal Inspector | Hygiene and Toxicology

Hazard Chemical Facilities and Safety Management Audits

SafeWork NSW, Better Regulation

Department of Customer Service

p 02 8867 2754 | **m** 0408 162 635

e abe.lau@safework.nsw.gov.au | www.safework.nsw.gov.au

Level 4, 2 Burbank Place, Baulkham Hills, NSW 2153



SafeWork NSW

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