Our ref: 09/177-04 - Ms C McMahon



20 November 2015

Ms Joanna Bakopanos Team Leader Industry Assessments Department of Planning & Environment GPO Box 39 Sydney NSW 2001

Attention: Ms Pamela Morales

Dear Ms Bakopanos

Exhibition – EIS for the Vopak Site B4 Project

I refer to your letter dated 16 October 2015 inviting submissions on the Environmental Impact Statement (EIS) for the *Vopak Site B4 Project* which is on exhibition. The proposal is for the construction and operation of a liquid fuels storage terminal and involves the:

- construction and operation of seven liquid fuel storage tanks with a combined storage capacity of up to 200 mega litres of Class 3 flammable or combustible fuel products;
- construction of new pipelines and a culvert on Friendship Road to interconnect with the Site B manifold; and
- extension of existing fire protection systems to Site B4 and installation of new fire protection systems.

I advise that Council has reviewed the document and provides the following comments.

Environmental Health

In reviewing the proposal, several issues are apparent that may have an impact from an environmental health perspective and should be addressed in the Construction Environmental Management Plan (CEMP), including:

- 1. Construction Phase
 - Stormwater and culvert construction;
 - Contamination from imported fill; and
 - Dust and wind blow particulate matters.
- 2. Ongoing Use and Operation Matters
 - Filling and water pollution issues into the Botany Bay catchment;
 - Stormwater surface runoff into the street gutter;
 - Ground contamination around tanks; and
 - Runoff from emergency operations such as fire brigade operations.

The location of the facility gives rise to concerns regarding stormwater pollution. Accordingly, it is appropriate that the site be provided with a first flush process for rain conditions to satisfy the EPA requirements. Furthermore, during emergency situations and fire-fighting operations, appropriate measures are to be enforced by the combat authority to ensure that water and chemical runoff does not enter the watercourse.

Traffic, Transport, Hazard and Risk

The subject site is located near Denison Street, Hillsdale, which has been identified as a Dangerous Goods Route. The City of Botany Bay Council, in consultation with the Department of Planning & Environment (Major Developments, Policy and Sydney East Regional teams) have engaged a consultant to undertake the *Land Use Safety Risk Study 2015* to examine the risk along Denison Street due to the transport of dangerous goods and the proximity to the Botany Industrial Park (BIP).

It is noted that Vopak have a concurrent Section 75W modification application before the DP&E (Secretary's Environmental Assessment Requirements have been released) for modifications to the existing Site B Terminal to which the proposed Project would be connected by pipe. The Section 75W application includes the product throughput of this B4 application as the flow to/from the ships and road tankers and pipelines is via the existing Site B distribution facilities. The modification will take into consideration the additional traffic generation, gantry pump noise, air quality impacts and other potential impacts associated with the increased gantry throughput.

Whilst it is recognised that the subject application seeks approval for the operation of the proposed Site B4 tanks only, their installation and operation are dependent on the Section 75W application. Given the Section 75W modification involves the transportation of dangerous goods (i.e. liquid fuel), determination of the modification and this subject application should be deferred until completion of the *Land Use Safety Risk Study* in early 2016.

For the Section 75W modification and subject application, a detailed Construction Traffic Management Plan (CTMP) should also be submitted by the selected contractor and prepared to the satisfaction of Council and the Roads and Maritime Services (RMS) prior to works commencing.

Should you have any queries concerning this matter, please contact Stephanie Lum, Senior Strategic Planner, on 9366 3564.

Yours faithfully

MANAGER STRATEGIC PLANNING

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