

Your reference s06/00303
Our reference : LICENCE 2148
Contact : Bob Marr (02) 9995 6825

Mr Chris Ritchie
Manager Industry – Major Projects Assessment
Department of Planning
23-33 Bridge St
SYDNEY NSW 2001

Dear Mr Ritchie

**Orica HCB Repackaging Plant
Modification Application 06_0028 MOD 5**

I refer to the email transmission of 28 February 2011 from your Emma Barnet seeking a submission from the Department of Environment and Climate Change and Water (DECCW) on the above matter. DECCW apologises for the delay in replying but has now considered the Department of Planning's (DoP) request for a submission regarding the application and offers the following comments:

- As you will be aware in addition to the above request to modify the Project Approval relating to the HCB Repackaging Plant, Orica is also seeking a modification to the Carpark Waste Remediation project to allow suitable wastes (lower HCB concentration) from store E to be treated in the Direct Thermal Desorption Plant. DECCW has made a separate submission on this issue.
- DECCW had significant involvement with the Pt 3A *Environmental Planning and Assessment Act* (EPAA) application by Orica to install and operate the HCB repackaging plant. DECCW supported the application as a positive step in managing this waste prior to its removal from the site to its destination for destruction. As you will be aware subsequent to Project Approval, DECCW attached conditions to Orica's Environment Protection Licence (EPL) to regulate this activity, particularly air emissions;
- As you may also be aware, Orica holds a Licence (No 26) under the *Environmentally Hazardous Chemicals Act* (EHCA) which permits Orica to keep, convey and process scheduled chemical wastes on-site. Both of the above licences have conditions attached which are framed to appropriately regulate environmental impacts associated with management and storage of HCB wastes; and

The Department of Environment and Climate Change NSW is now known as
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Department of **Environment and Climate Change** NSW



- On the basis of the information available, DECCW considers that providing Orica implements appropriate environmental controls during the store E waste re-location activity, the new HCB waste processing arrangements should pose no new or significant environmental impacts. On that basis DECCW has no objection to Orica's proposal to relocate suitable wastes stored at store E and process these in store J with the following provisos:
 - Prior to commencement of the store E waste relocation activities, the applicant must prepare and provide to DECCW a report which details including, but not limited to, how dust, vapours, odours and any contaminated drainage will be dealt with during the waste disturbance and relocation process. The report must include details on the environmental controls associated with vehicular movements; and
 - The applicant must at all times ensure compliance with the conditions attached to EPL Number 2148 and EHC Act Licence number 26.

If you have any queries regarding this matter please contact Bob Marr on 9995 6825.

Yours sincerely,

 14/3/11

JAMES GOODWIN
Unit Head, Metropolitan Regulatory Projects & Programs
Environment Protection and Regulation