



Our Reference: DOC18/212600-01
Your Reference: MP 06_0028 MOD 7

Ms Emma Barnet
Senior Planning Officer, Industry Assessments
Department of Planning & Environment
emma.barnet@planning.nsw.gov.au

Dear Ms Barnet

Re: Orica Hexachlorobenzene Repackaging Facility Modification 7 (MP 6_0028 MOD 7)

I refer to your e-mail dated 9 April 2018 inviting the NSW Environment Protection Authority (EPA) to make a submission on Orica's request to modify its Project Approval (MP 06_0028) for the Hexachlorobenzene Repackaging Facility.

The EPA notes the inconsistencies identified between the current Project Approval and Environment Protection Licence (EPL 2148) and prefers Orica's proposed amendments (Table 2, Modification Application) over the corresponding alternative options.

The EPA routinely inspects the storage of HCB at Orica's premises, reviews licence conditions to ensure they are appropriate and evaluates environmental monitoring data for compliance. The EPA supports the amendments proposed by Orica whereby the consent would refer broadly to the conditions of the EPL. This approach allows the EPA to vary the EPL in the future (if required) to ensure continued appropriate regulation without additional modification requests and eliminates the potential for future inconsistencies in the Project Approval and EPL.

If you have any further questions, please contact Larissa Borysko on (02) 9995 6843.

Yours sincerely

Erin Barker 18/4/2018

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