


From: Matthew Meyerson matthew.meyerson@planning.nsw.gov.au 
Subject: Proposed Section 75W modification - Toxfree Chemical Waste Storage and Treatment Facility (MP 06_0095)
Date: 8 January 2015 2:37 pm
To: shay@sgconsulting.net.au

MM

Dear Shay,

Proposed Section 75W modification - Toxfree Chemical Waste Storage and Treatment Facility (MP 06_0095)

Thankyou for your letter dated 10 December 2014. The Department is satisfied that the above mentioned modification will not require a new set of Secretary's Environmental Assessment Requirements (SEARs) and the previous SEARs will apply to this Section 75W modification.

Please make note of the following specific environmental assessment requirements that must be addressed during the preparation of the EIS:

- waste classification and handling;
- hazards and risks;
- air quality;
- noise; and
- traffic.

Lastly, it is imperative that you consult directly with the Environment Protection Agency in regards to licencing matters.

If you have any questions or concerns please contact me on 9228 6378.

Kind Regards,
Matthew Meyerson

Matthew Meyerson

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Mr Jessie Brown
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(emailed to: j.brown@toxfree.com.au)

Contact: Kerry Hamann
Phone: 02 9228 6516
Fax: 02 9228 6466
Email: kerry.hamann@planning.nsw.gov.au

Dear Mr Brown,

Subject: Modification Request - Toxfree (MP 06_0095 MOD 3)

I refer to the submission of an Environmental Assessment (EA) prepared in support of your request to modify the Project Approval (MP 06_0095) for the Toxfree waste treatment and storage facility at St Mays.

The Department has considered the details provided within the EA and notes that the proposal would significantly increase the quantities of Dangerous Goods to be stored at the site. In addition, a new treatment process would be introduced (Acid Alkaline Neutralisation).

To assist in the assessment of your modification, it is requested that you revise the EA to include the following additional information:

- a detailed locality plan including the site, nearby watercourses, industrial buildings, shopping and employment areas, hospitals, schools and transport routes;
- a preliminary hazard analysis (PHA) prepared in accordance with *Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis*. The PHA should, in particular:
 - estimate the risks from the proposed modification, the existing site and the overall site;
 - identify the hazards, arising out of the proposed modification and the existing site as well as any external hazards (i.e. natural hazards) to determine the potential for off-site impacts;
 - provide more detailed information on the Acid Alkaline Neutralisation process and equipment;
 - critically review the chemical reaction and the chemical products (including any intermediates) related to the Acid Alkaline Neutralisation and establish the probability of formation of toxic gases;
 - evaluate the probability of a failure of the proposed scrubber and estimate the potential impacts; and
 - demonstrate that the proposed development complies with the criteria set out in *Hazardous Industry Planning Advisory Paper No 4 - Risk Criteria for Land Use Safety Planning*.
- details of the gases which would be treated within the proposed scrubbing system and potential air emissions following treatment.

Should you have any specific questions in relation to hazards and risk, please contact Ms Lilia Donkova on 9228 6110. For all other enquiries in relation to the proposal, please contact Kerry Hamann on the details provided above.

Yours sincerely



Chris Ritchie
Director
Industry Assessments
As the delegate of the Secretary

2/9/15.