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Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Melissa Prochazka  
By email: [melissa.prochazka@planning.nsw.gov.au](mailto:melissa.prochazka@planning.nsw.gov.au)

2 February 2018

Dear Ms Prochazka

**PARK FUELS BULK LIQUID FACILITY KOORAGANG ISLAND – SECTION 75W MODIFICATION  
(07- 0066 MOD 5) – COMMENTS AND RECOMMENDED CONDITIONS**

I refer to your email to the Environment Protection Authority (EPA), dated 18 January 2018 inviting comments and any recommended conditions of consent regarding the proposed s75W Modification for the Park Fuels facility at Kooragang Island.

We understand that the modification application involves:

- Increase the maximum annual throughput from 577 million litres per annum to 980 million litres per annum;
- Increase the number of ship deliveries from 27 to 35 per year;
- Increase the number of truck movements from 64 to 96; and
- Modify the tank design for tanks T-3, T-4, T-5 and T-6 from the approved internal floating roof to either fixed or internal floating roof.

The EPA has reviewed the EIS and provides the following comments and recommendations:

**Air Quality**

The EPA has reviewed the Air Quality Assessment (Jacobs, 2017)<sup>1</sup> (the assessment) submitted for the development application. Jacobs (2017) assesses emissions of benzene, ethylbenzene, cyclohexane, hexane, cumene, toluene and xylenes for the proposed increase in capacity and assess predicted

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<sup>1</sup> Jacobs, 2017 – *Proposed Modification to PA07-0066 – Fuel Storage/Distribution Facility at Kooragang Island Air Quality Assessment*, prepared by Jacobs dated 7 December 2017.

ground level concentrations against impact assessment criteria contained in the *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*. Emissions from bulk liquid fuel storage and distribution facilities occur through tank breathing (breathing or standing losses) and unloading/loading operations (working losses).

The assessment utilises US EPA TANKS to estimate emissions of volatile organic compounds. The dispersion model CALPUFF is utilised to predict ground level concentrations of volatile organic compounds for the proposal. The assessment:

- does not predict exceedances of the impact assessment criteria for toxic compounds (benzene, ethylbenzene, cyclohexane and hexane);
- does not predict exceedances of individual odorous compounds toluene and xylene; and
- predicts ground level concentrations of cumene (odorous compound) at the impact assessment criteria at the neighbouring industrial receptor.

EPA advises there is conservatism in the assessment as the dispersion modelling assumes:

- maximum hourly pumping rates for ship unloading and truck loading; and
- assuming ship unloading and truck loading activities occur continuously during each hour throughout the modelled year.

EPA advises that there are some issues that require additional information and/or assessment to confirm the assessment outcomes. It is recommended that prior to determination the proponent provide additional information and/or revised assessment to address the issues in **Attachment 1**.

## Noise

EPA have reviewed the noise components of the modification application. We advise that EPA can support the modification application, based on there being no increase in the noise emissions on which the facility's EPL limits were based.

Should the development be modified either by the applicant prior to the granting of the consent or as a result of a condition proposed to be attached to the consent, it will be necessary to consult with the EPA about the changes before consent is granted. This will enable the EPA to determine whether a recommended condition of approval needs to be modified in light of the changes.

## Environment Protection Licence Variation

The proponent currently holds Environment Protection Licence 12977 under the Protection of the Environment Operations Act 1997 (POEO Act) for scheduled activities already being undertaken at the premises. Should DPE approve the proposal, the proponent will need to apply for and obtain a Licence Variation from the EPA prior to any increase in fuel throughput.

If you require any further information regarding this matter please contact me on 4908 6821 or by email to [hunter.region@epa.nsw.gov.au](mailto:hunter.region@epa.nsw.gov.au).

Yours sincerely

 2.2.18

**BILL GEORGE**  
**Senior Regional Operations Officer - Hunter**  
**Environment Protection Authority**

## ATTACHMENT 1

Additional information and/or assessment required to confirm the assessment outcomes. Park Fuels Kooragang Island - Section 75W Modification (07- 0066 Mod 5)

### Meteorological data for Emission Estimation

The EPA notes that Appendix A of Jacobs, 2017 provides the settings used for emission estimation utilising US EPA TANKS. Appendix A of Jacobs, 2017 states that Sydney Airport Meteorological data has been utilised for emission estimation.

***EPA recommend the proponent provide emission estimation utilising meteorological data for the site location. Where these emission estimates significantly differ from those assessed, the assessment should be revised.***

### Assess the proposed modification against Section 63 of the *Protection of the Environment Operations (Clean Air) Regulation 2010*

Section 63 of the *Protection of the Environment Operations (Clean Air) Regulation 2010* (the Regulation) outlines the requirements for large storage tanks (including requirements for floating roofs). As the proposal modification seeks to amend the current approval for internal floating roofs (for tanks T-3, T-4, T-5 and T-6) the proponent should assess the proposed modification against requirements outlined in Section 63 of the Regulation.

***EPA recommend the proponent should provide an assessment against Section 63 of the Regulation, to clarify the proposed modification to either floating or fixed roof tanks.***

