

Date: 30 October 2012
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Your Ref: 10/14333

Mr Chris Ritchie
Manager – Industry
Major Projects Assessment
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: Andrew Hartcher

Dear Mr Ritchie

**Orica AN Emulsion Project, Richmond Vale
Proposed Modification (09_0090 MOD 1)**

Thank you for your letter dated 15 October 2012, inviting WorkCover's submission on the project, including advice on recommended conditions of approval.

The proposed modification works do not involve scheduled materials relevant to Major Hazard Facilities. However, given that the modification will be carried out while the facility is operating, there is the possibility of the construction activities impacting on the normal facility operations and leading to an incident and also, an incident in the operations area impacting on the construction works and personnel.

WorkCover considers that Orica should be required, through the suggested conditions of approval, to address the above concerns and manage the activities safely.

Should the Department determine to approve the proposal, the suggested conditions of approval are:

1. Prior to commencement of the works associated with the proposal, the proponent must carry out a risk assessment with particular attention to the impact on and from the normal activities on the site, and ensure that measures are in place to reduce the risks to as low as reasonably practicable.
2. The modification works must be carried out in accordance with the site safety management system. In particular, management of change procedures must be followed and documented.

Should you have any queries, please contact me on telephone (02) 8281 6485 or email sohan.fernando@workcover.nsw.gov.au.

Yours sincerely



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WorkCover Authority of NSW