Locked Bag 1837 St Leonards NSW 2065 T: 02 9921 2999 F: 02 9921 2552 www.agl.com.au

A few words.

MAGL

Energy in

action.

Department of Planning and Infrastructure

23-33 Bridge Street

Sydney NSW 2000

9 September 2012

Dear Sir/Madame,

Part 3A Approval 10_0133 - Newcastle Gas Storage Project

Section 75W Application – Washing Out of Concrete Trucks

AGL is the proponent of the Newcastle Gas Storage Project, a transitional Part 3A project, which was approved by the Planning and Assessment Commission on 10 May 2012 subject to conditions (**Part 3A Approval**).

Condition A1 of the Part 3A Approval requires the proponent to carry out the Project:

...generally in accordance with the:

- (a) Environmental Assessment;
- (b) Preferred Project Report;
- (c) Statement of Commitments; and
- (d) conditions of this approval

The final Statement of Commitments prepared for the Newcastle Gas Storage Project states that concrete mixers and pump trucks are not washed on-site. Refer to section 7.1.1 of the Preferred Project Report.

AGL has lodged this application under section 75W of the *Environmental Planning and Assessment Act 1979 (NSW)* (**EP&A Act**) to modify the Part 3A Approval so as to authorise:

- the washing out of concrete mixers and pump trucks on site;
- the construction and operation of a small temporary concrete washout pit on site for initial concrete culvert and causeway works; and
- the construction and operation of a larger temporary washout area to replace the initial washout pit for all other concrete works required during the construction phase.

This letter:

sets out the technical and operational reasons behind this modification operation;



- outlines the controls which are proposed to be included in the Waste Management Subplan forming part of the Construction Environmental Management Plan (CEMP);
- provides details of the proposed temporary concrete washout pit; and
- confirms the time by which the proposed temporary concrete washout pit will need to be in place if it is not to delay the construction of the Newcastle Gas Storage Facility, a Critical Infrastructure project.

Technical and operational reasons

It is necessary to modify the Part 3A Approval so as to authorise the washing out of concrete mixers and pump trucks on site and the construction and operation of a temporary concrete washout pit on site for the following reasons:

- a. To prevent the uncontrolled discharge of remnant concrete or slurry from the truck while travelling from the site: After the concrete truck has completed it's pour, waste concrete is left in the chute and agitator. If this waste is not cleaned it is likely to fall from the truck during transit either on the site or the public road between the batch plant and site. These dropped piles of concrete would:
 - be an illegal disposal of waste that the drivers would be liable for;
 - pose a safety risk to motorists; and
 - pose a potential contamination risk to groundwater.
- b. To prevent drying of the remaining concrete in the bowl or chute which may cause damage to the truck and/or contaminate future loads of concrete.
- c. Due to the reasons above, if this commitment is not modified and no concrete washout pit is installed on site, it may not be possible to get concrete supply companies to deliver concrete to the site.

Controls

Appendix B of the Waste Management Subplan, which forms part of the CEMP, outlines the proposed controls and is reproduced below.

APPENDIX B: CONCRETE WASHOUT AREA (CWA)

1.0 Establishment

Approximately 4000 m³ of concrete will be required to complete construction. It is estimated that there could be up to 30,000 litres of wastewater generated from washout of chutes and pump equipment. Concrete wastes will temporarily be stored in the CWA and removed from site as per waste classification set out in this Plan.

All concrete trucks will wash down their chutes and rinse their bowls before exiting the site onto public roads to prevent tracking. Wash down will be undertaken only at the CWA which will be designed to capture liquid and solid concrete washout waste produced at the end of a concrete pour. This area will be established in close proximity to the area of the largest pour, 20m from storm drains, open ditches or water bodies. It will be signposted for ease of identification and regularly checked to ensure controls are maintained, walls are not damaged and liquid level is not going to overflow.

The volume of the CWA will be 120 per cent of the estimated volume of waste for the largest concrete pour on site. The



washout area will be concrete lined to ensure that wash water and the concrete particles does not get into the ground water. The edge of the washout area will be raised to stop surface water runoff getting in. The washout will not be covered so it will have to be pumped out after rain events when it's not being used. Upstream runoff will be diverted around the washout area.

CBI will incorporate requirements for concrete waste management into material supplier and subcontractor agreements and will arrange for the subcontractors representative to enforce concrete waste management procedures.

Concrete wastes to be placed in the CWA include:

- concrete washings;
- concrete effluent;
- excess concrete delivered to site but not used for the development; and
- any other waste material containing concrete.

Concrete waste taken from the CWA will be transported to a local batching plant, disposed of at an approved landfill or by a waste concrete recycler.

2.0 Washing out Procedures

- 1. Washout of concrete trucks and other concrete –coated equipment must be performed in designated areas only; and
- 2. When leaving designated areas ensure all plant and equipment will not spread waste materials as they leave the CWA.

3.0 Inspection and Maintenance

- Inspect and verify that CWA safeguards/ control measures are in place prior to the commencement of associated activities;
- 2. Repeat step 1 after rain events;
- Maintaining CWA must include removing and disposing of hardened concrete and returning the area to the functional condition;
- 4. Hardened concrete materials should be removed and disposed of in accordance with WMP sub plan; and

4.0 Removal of Concrete Washout Area

- When the CWA is no longer required for the work, the hardened concrete must be removed and disposed of in accordance with the WMP;
- Materials used to construct the CWA should be removed from the site of the work and disposed of in accordance with the WMP procedures; and



3. Holes, depressions or other ground disturbance caused by the removed of the CWS must be backfilled and repaired.

Technical Specifications

Below is a sketch showing the indicative design of the proposed washout area that will conform to the conditions in the Waste Management Subplan.

The washout area shall be clearly sign posted and the procedure for its use will be included in the Environmental Safe Work Method Statement.



Indicative Location

The indicative location is shown below:





Note that no additional clearing will be required for the CWAs as they will be located within the existing footprint of the facility construction site.

Indicative Timing

The culverts and causeways installed as part of the civil infrastructure works are the first activity requiring concrete delivery to site. It is currently proposed that this work will begin in late September 2012.

For this work (which would require one or two trucks per pour) a small temporary washout pit shall be constructed in consultation with the civil contractor. The larger washout area including the pit shown in the above drawing, will be constructed in time for the pouring of concrete for the LNG tank foundation in January 2013.

Consultation

Both Hunter Water and NSW Office of Water have been consulted in regard to this proposal. They are satisfied that AGL will be able to manage the potential risks associated with the installation of the temporary wash out areas. Refer attachments.

Please contact me if you would like any further information in relation to this application.

Yours sincerely,

Timothy Knill

Attachment 1 – Correspondence from Hunter Water





Hunter Water Corporation

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FOR FRANK FOR
FOR FRANK FOR

Ref: HW2009-457/20/7

Ms Anna Timbrell NSW Department of Planning and Infrastructure 23-33 Bridge Street SYDNEY NSW 2000

22 August 2012

Dear Anna,

RE: Newcastle Gas Storage Facility: Modification to Part 3A Approval – Concrete Washout Area

I am writing in regard to recent correspondence from AGL (Arianna Henty 16/08/12) proposing a modification to the Part 3A Approval of the Newcastle Gas Storage Facility to allow the installation of a Concrete Washout Area (CWA).

Having reviewed the documentation provided by AGL outlining the rationale and design of the onsite CWA, Hunter Water is satisfied that AGL will be able to manage the risks posed to the Tomago Sandbed Drinking Water Catchment that are associated with the CWA's construction and operation.

If you require further clarification please contact Declan Clausen on (02) 4979 9469.

Yours sincerely

Beny.

Emma Berry Manager, Water Resources

Cc: Tim Knill, Construction Project Manager, AGL Newcastle Gas Storage Facility

www.hunterwater.com.au

Attachment 2 – Correspondence from NSW Office of Water



Hi Tim,

Apologies for the delay in responding. A review of the information provided in Arianna's email (below) supports the need for a project amendment to enable the construction of a Concrete Washout Area. Further, the information provided suggests that the construction and operation of the proposed concrete washout pit should be able to be managed without impact to water resources in the area. Accordingly, the proposed amendment is acceptable to the Office of Water.

Regards

Mark Simons

Senior Planning and Assessment Coordinator,

Major Projects, Mines and Assessment

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Department of Primary Industries