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28 July, 2020

Mr. Chris Ritchie
Director – Industry Assessments
Department of Planning Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Chris

**RE: SHOALHAVEN STARCEHS EXPANSIO PROJECT MOD 17
(06_0228-MOD 17)**

I refer to the Department's letter dated 23rd July 2020 in which the Department in effect sought clarification as to whether the above Modification Application proposes additional bulk chemical storage, or relocation of existing caustic soda, hydrochloric acid and cationic reagent storage.

The Department seeks this clarification given inconsistent descriptions between our firms submission dated 19th June 2020 and the Preliminary Hazard Analysis prepared by Pinnacle Risk management which supported that submission.

I can confirm that the description outlined in Section 2.3 of our firms submission is correct, that is the proposal does involve the provision of additional chemical storage to the south of the Product Dryer Building (also called GD8 in the PHA).

Please find attached a revised PHA prepared by Pinnacle Risk Management. The PHA has been revised by removing the reference to the relocation of the chemical storage to rather referring to the provision of additional chemical storage consistent with Section 2.3 of our firm's submission. In this regard it is noted that the revised PHA states:

"...Also, additional chemical storage tanks (caustic soda, hydrochloric acid and cationic reagent) are to be located to the south of the GD8 building (i.e. further away from Bolong Road). As there are no fire, explosion or toxic gas emission risks from these tanks that can affect off-site users and the tanks are to be bunded as per AS3780 to prevent environmental impact then no further analysis is warranted."

The PHA has been modified to reflect this situation. I would request that the Department takes the attached revised PHA into its consideration of this Modification Application.

If you require any further information in relation to this matter please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "Stephen Richardson." The signature is written in a cursive style with a large initial 'S' and a trailing period.

Stephen Richardson
COWMAN STODDART PTY LTD

Enc.