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1 Executive Summary

1.1 The following approvals are currently held or operated under by the Ixom Botany ChlorAlkali Plant

Table 1: Current approvals and licences

Approval No.	Date last varied	Details of any changes made during reporting period
DA 35/98	10-09-2018	No Change
EPL 20547	10-10-2019	Variation Notice number 1564734 to update the site map. No change to conditions.
MHF 10358-01	11-02-2014	No change. Work in progress for renewal.
DG 35/03500 07-07-2019 (held by Botany Industrial Park)		No change. Renewal

IXOM Operations Pty Ltd, Botany ChlorAlkali Plant (CAP) is required to provide an Annual report to DPIE as per condition 47 and 48 of DA 35/98. The last variation of the DA 35/98 was on 10 September 2019, MOD 5 – Repack Facility. CAP is located within the Botany Industrial Park (BIP) in Sydney, New South Wales.

MOD 5 of the DA 35/98 was included in the Independent Environmental Audit (IEA) conducted by AECOM in October 2019 and the findings of the final report will be discussed in this annual report.

This Annual report covers the period between 1 December 2019 to 30 November 2020 and is following the CRPAR guidelines issued June 2018. The report presents those relevant conditions pertaining to the current operations of the plant.

There was a variation update of the EPL 20547 issued on 10 October 2019, in relation to the lot number updates for the operators on the BIP site. The updated site map is attached as Appendix C.

In summary, the self-assessment Annual report as follow;

- There were no non-conformances identified during the reporting period.
- One complaint was received from a community member regarding noise from contractor trucks during a high traffic period of operation, a discussion was had with the transport company and the high traffic period was strictly for one week which the community member was pleased with as a resolution
- No issues were identified or raised in relation to environmental performance.
- Production was very close to the forecasted value (in 100% Caustic) increasing on the previous year however, truck movements have slowed down significantly offsetting it from the forecasted value.
- Effluent discharge has increased on the previous year however remained below the target. The higher effluent discharge is largely contributed to by heavy rainfall events particularly in February
- AECOM conducted an independent environmental audit in October of 2019, among the findings were three non-compliances against DA 35/98 related to traffic management, Noise and handling of excavated material. AECOM have provided 4 recommendations to resolve the non-compliances as well as 16 additional opportunities for improvement.

2 Introduction

2.1 Site Overview

Table 2: Site Details

Decided Names and DA	
Project Name and DA	Replacement of Chlor-Alkali Plant at Botany, DA35/98 (Ref.
number	R98/00010)
Site Address	16-20 Beauchamp Road, Matraville NSW 2036
Industrial Complex	Botany Industrial Park (BIP)
Local Government Authority	City of Sydney
Site Area	BIP – 70 hectares
	Site – 23 hectares
Locality Map	Appendix A
Site Plan	Appendix A
Current Use	Botany ChlorAlkali Plant
Lot No.	LOT 1101 DP 1227173, LOT 1102 DP 1227173, LOT 1103 DP
	1227173, LOT 1104 DP 1227173, PART LOT 1115 DP 1227173
Site Owner	Orica Limited owns approximately 40% of land at the BIP, including
	the area specific to this EMP
Reporting Period	1 December 2019 – 30 November 2020

The facility manufactures chlorine and caustic soda from the electrolysis of salt. Hydrogen is produced as a by-product. The four main products produced are sodium hypochlorite (referred to as 'Hypo'), hydrochloric acid, caustic soda and ferric chloride.

The chlorine produced on site is used in the manufacture of hydrochloric acid, hypo and ferric chloride, with these downstream processes being collectively referred to as product plants. All chlorine produced at Ixom Botany ChlorAlkali facility is consumed in the product plants.

The plant can produce 31,200 tonnes per annum (TPA) of chlorine assuming 95% uptime. All chlorine is reacted to produce the following product range:

- HCI (~35,000 TPA)
- Hypo (~55,000 KLPA)
- Ferric chloride (~21,200 TPA)
- Sodium hydroxide (Caustic ~36,000 TPA as 50%) (co-product of chlorine manufacturing process).

2.2 Key Contacts for Environmental Management

Table 3: Environmental Contacts for Ixom Botany ChlorAlkali Plant

Name	Position	Contact Details	
lan Parker	NEA Regional Manager	02 9352 2254	
		0400 686 047	
		lan.Parker2@ixom.com	
Ben Pagarigan	Compliance Manager NEA	02 9352 2123	
		0476 410 458	
		Benedick.Pagarigan@ixom.com	
Lauren Sibigtroth	BIP Environmental Advisor	02 8336 1339	
		lauren.sibigtroth@qenos.com	

3 Compliance Status Summary

Compliance Status Descriptors

Compliant Sufficient verifiable evidence to demonstrate that all elements of the requirements have been

complied with.

Non-compliant A non-compliant with one or more elements of the requirements

Not triggered A requirement has an activation or timing trigger that has not been met at the phase of the

development when the compliance assessment is undertaken, therefore an assessment of

compliance is not relevant.

Table 4: current relevant approvals and licences

Approval No.	Date last varied	Details of any changes made during reporting period
DA 35/98	10-09-2018	Mod 5, Repack Facility
EPL 20547	10-10-2019	Variation Notice #1564734, site lot numbers updated

3.1 Compliance Table

Table 5: Status of compliance (Relevant Conditions)

Approval No.	Conditions	Monitoring Methodology	Evidence and Comments
DA 35/98	11	Ongoing Hazards Management – Hazard Analysis due every 3 years	Compliant – due In 2021
	12	Incident Reporting	Compliant - Refer to Section 6
	13	Hazard Audit – Required 3 every 3 years	Compliant – Scheduled for March 2021 last completed 2018
	24	Independent Environmental Audit – Required every 3 years	Compliant – Completed in Dec 2019 next due 2022
	47	Annual report - commercial traffic Movements	Compliant - See Appendix A
	48	Annual report - Environmental performance	Compliant - See Appendix B
	48	Annual report - Community Complaints	Compliant - Refer to section 7

4 Non-Compliances

3 non-compliances were identified during the reporting period, 1 December 2019 - 30 November 2020.

Table 6: non-compliances during the reporting period

Approval No./ Conditions	Conditions	Comments
DA 35/98	15	Identified in IEA of 2019.
DA 35/98	21	Identified in IEA of 2019.
DA 35/98	35	Identified in IEA of 2019.

All non-compliances identified in the IEA have since been rectified using the recommendations of the AECOM IEA Auditors.

5 Previous report actions

Previous report actions which have been undertaken during the reporting period.

Table 7: Actions required from previous Annual Review

Progress	Comments

6 Incidents

During the reporting period there were no incidents or non-compliances against the conditions of any relevant permit, license or approval for the Ixom Botany ChlorAlkali Plant.

The table below list incidents which occurred during the reporting period which are related to conditions in DA35/98. However, no incidents were found to constitute a non-compliance against DA 35/98.

6.1 Incidents Register

Table 8: Incidents Register

Nature of incident	Relevant conditions	Date of incidents	Status of Report
Chlorine detectors triggered by probable tanker product incompatibility	Condition 25 DA 35/98 – Pollution control	11/05/2020	Resolved, procedures have been updated, does not constitute a non-compliance
Chlorine Compressor Recycle Valve found to have pinhole chlorine leak in the valve body triggering SRA Boundary Detector.	Condition 25 DA 35/98 – Pollution control	21/05/2020	Resolved, Valve replaced with Stainless steel body and Preventative Maintenance routine put in place on a 2-yearly cycle
Hole in impulse line at HCl burner	Condition 25 DA 35/98 – Pollution control	25/10/2020	Line has been replaced and external inspection has been put in place on a 2-yearly cycle

7 Complaints

During the reporting period there were no incidents or non-compliances against the conditions of any relevant permit, license or approval for the Ixom Botany ChlorAlkali Plant

The Botany Industrial Park (BIP) maintains an up to date website for the public that provides the following information:

- Minutes of the BIP Community Consultative Committee (BIPCC)
- Community Hotline
- Contacts for Regulators
- Items of interest including updates where appropriate.
- Commitments to Safety

Ixom maintains an up to date public website that provides the following information:

- Information about the Botany ChlorAlkali plant
- Details of Licence conditions
- Contact details for more information on the facility
- Map of licensed discharge points
- Results of monthly air quality monitoring
- Safety Management system
- Emergency Response including PIRMP
- Actions for the public to take in the event of an emergency
- Pollution Notification Process

There were two BIPCCC meetings held in the reporting period, on 4 December 2019 and 18 November 2020. Steven Barclay, Botany Site Manager (formerly) attended the meeting in December 2019 as representative for Ixom, and Ian Parker, NEA Regional manager and site manager for Ixom CAP Botany attended as representative for Ixom in November 2020. The number of BIPCCC meetings held during the reporting period was reduced due to COVID-19 restrictions.

There was one public complaint recorded against Ixom via the community hotline during the reporting period.

7.1 Complaints Register

Table 8: Complaints Register

Nature of complaints	Relevant conditions	Date of complaint	Status of Report
Community member complaint about excessive air braking noise	Condition 35 - Noise management	14 th August	Noise was identified as the salt delivery trucks moving to and from site from the 14 th – 22 nd of august. Ian Parker contacted transport company to avoid excessive use of airbrakes along Denison street and Lauren Sibigtroth advised the community member that the trucks would stop coming to site as of the 22 nd of august. The complainant was satisfied that the noise would end soon and that the company had been contacted.

8 AECOM IEA Review

A three yearly Independent Environmental Audit was conducted at the Botany CAP site by AECOM on the 16th and 18th of October 2019 in accordance with condition 24 of DA 35/98. The report was not generated until December of 2019 and hence will be discussed in this report.

3 non-compliances against DA 35/98 were found in the audit and are listed below:

- Inadequate detail included in the traffic management plan with regards to ensure trucks use the routes outlined in the plan, as required by condition 15 of DA 35/98.
- The management of contaminated material during the excavation process of MOD 5.
 Material was managed in accordance with MOD 5 Construction Environmental
 Management Plan, however was not compliant with condition 21 of DA 35/98.
- Evidence that the noise management plan was approved by the EPA was not provided, as required by condition 35 of DA 35/98

In response to the non-compliances, the following recommendations were provided by AECOM to comply with the respective conditions of DA 35/98

Condition	Recommendation Number	Recommendation	Comments
15	2019 IEA REC 001	Include reference to the requirements of condition 15 in the traffic management plan. Specific mention should be made to the allocated entry to the site via the main arterial roads	Done
15	2019 IEA REC 002	Endeavor to enter into contractual arrangements with transport companies to require their trucks to use the routes outlined in the traffic management plan	Done
21	2019 IEA REC 003	Consult with the DPIE on how best to resolve this discrepancy. Consider removing / rewording this Condition in the next Modification to the Development Consent.	Prompt added to the compliance matrix to update DA 35/98 during next modification, Consultation meeting with DPIE to occur at this point.
35	2019 IEA REC 004	IXOM to seek approval of the noise management plan from the EPA.	Done

In Addition to the recommendations, the auditors identified 16 items as opportunities for improvement (OFI). These are not considered non-compliances against DA 35/98. The OFI's are tabulated below:

OFI Number	Opportunity for improvement	Comments
2019 IEA OFI 001	Consider options for reducing the	Will consider implementing
	impacts of spills / leaks from	impervious barrier to prevent
	pipelines to land. This could include	contamination of soil
	systematically replacing sections	
	beneath the pipelines with hard stand	Due: Apr 2021
	on a risk-based approach.	
2019 IEA OFI 002	Improve housekeeping to prevent	Done. – Included in the daily checks
	iron chips from entering stormwater	to ensure good housekeeping
	drain	to ondere good nouseneeping
2019 IEA OFI 003	Include a brief discussion of the	Update EMP to reflect OFIs
	Development Consent and each of the	opulio 2001 to Tolloct OT 15
	Modifications 1-5 and what they	Done
	approve in Section 3.2.	Done
2019 IEA OFI 004	Include the requirements of the	Update EMP to reflect OFIs
2017 12/1 011 004	relevant Development Consent	opulate Elvir to reflect Of is
	Conditions to each significant	Done
	environmental aspect and discuss	Done
	how they will be addressed.	
2019 IEA OFI 005	Include the Work Health and Safety	Lindata EMD to reflect OEIs
2019 IEA OFI 003	Act 2011 and the relevant	Update EMP to reflect OFIs
		Dana
	requirements (in particular relating to	Done
	Major Hazard Facility Licence and	
	Dangerous Goods Notification) to	
	Table 1 General Requirements	
2010 YEAR OFF 006	Register	
2019 IEA OFI 006	Include the NGER Act and relevant	Update EMP to reflect OFIs
	requirements to Table 1 General	
	Requirements Register	Done
2019 IEA OFI 007	Consider including energy use as a	Update EMP to reflect OFIs
	significant environmental aspect and	
	including specific discussion of how	Done
	the Botany CAP is managing this	
_	aspect.	
2019 IEA OFI 008	Update the 'Noise and Amenity'	Include in the noise section of the
	aspect to make it more specific to	EMP the monitoring location that
	noise. In particular, ensure that the	Ixom is impacted
	Development Consent Conditions	_
	relevant to noise are included as	Done
	'Requirements' and that these are	i i
	addressed in the plan. Also include	
	further discussion of the noise	
	monitoring program undertaken by	
	the BIP including the monitoring	
	locations and which receivers are	
	impacted by the Botany CAP.	
	mparter of the Dounty Of H.	

2019 IEA OFI 009	Update the Waste Generation aspect (Section 6.2.4) to include further detail. Specifically, consider including the following: Outline of the Development Consent Conditions relevant to waste Outline the key legislative requirements relating to waste, in particular, the requirements of the POEO Act 1997 and POEO (Waste) Regulation 2014 Include discussion of the potential impacts to resource depletion from inappropriate waste management Include mitigation measures for solid waste management, including the prevention / minimisation of waste generation. Include mitigation measures for solid waste management, including the prevention / minimisation of waste generation. Identify the waste streams generated by the Botany CAP and include discussion of the management of each waste stream.	Update Waste Management plan to include recommendations Provide further detail on the different waste streams generated by the Botany CAP and the management measures (include measures to reduce generation, storage, collection and disposal) for each waste stream. Included waste management details in the waste section of the EMP document Done
2019 IEA OFI 010	Consider developing a Waste Register (similar to the Materials Tracking Register prepared for MOD 5) to better track all waste generated and removed from site. This is also a requirement of IXOM's Global Waste Management Procedure (SHE- GBL-PRO-ENV-003 – Waste Generation)	Developed waste tracking register and implement as part of the Waste management procedure Done
2019 IEA OFI 011	Include reference to the requirements of Condition 15 in the Traffic Management Plan. Specific mention should be made to the allocated entry to the site, via the main arterial roads.	Done
2019 IEA OFI 012	Seek confirmation from the DPIE that the 2017 Hazard Audit had been provided and if not, re-submit report to the DPIE	Email to compliance@DPIE and find out Done. Submitted 4/2/2020. Approved letter received 28/2/2020

2019 IEA OFI 013	Include in the sites Traffic Management Plan a description of the process in place and location of storage should a road tanker of chlorine be required to be parked on site. Also ensure it reflects the requirement that the time the full road tanker spends on site does not exceed 4380 hours in any 12-month period and how this would be tracked.	Done
2019 IEA OFI 014	Consult with the property landlord to request general maintenance of the	Done. Request for maintenance and rectification has been made to Orica,
	visitor car park.	who is considering the request
2019 IEA OFI 015	Request to have Conditions 32 and 33 removed / updated in the next Modification to reflect the noise limits set out in the EPL.	Prompt added to the compliance matrix to update DA 35/98 during next modification, Consultation meeting with DPIE to occur at this point.
2019 IEA OFI 016	Provide further detail on the different waste streams generated by the Botany CAP and the management measures (including measures to reduce generation, storage, collection and disposal) for each waste stream.	Done. Included in waste management plan. Waste management plan work instruction has been made available in Sharepoint Document management System, short version is included in the EMP

9 Appendices

9.1 Appendix A – Production and Truck Movements

9.1.1 Production Metrics

The period covered by this report saw an increase in production compared to the previous year and slightly above forecast. The traffic movements have decreased likely due to increased use of B-doubles by carriers. The plant achieved an uptime rate of approximately 93% which indicates consistent operation throughout the year.

Truck movements (figures reported below include both inwards and outwards movements – i.e. one truck entering the facility to load then exiting is counted as two truck movements), the number of truck movements has decreased in 2020 despite increasing in production in the 2020 reporting period. Table 9 and Figure 1 show a summary of key metrics for the facility over this reporting period compared to previous years.

Table 9: Production Metrics Summary

Reporting Requirement	Limit	Previous reporting period (2019 actual))	This reporting period (2020 actual)	Next reporting period (forecast)
Traffic movements into and out of site	N/A	19,146	17,392	19,200
Hours spent by loaded chlorine road tankers on site	4,380	0	0	0
Production (100% caustic)	N/A	27,418	28,460	27,751

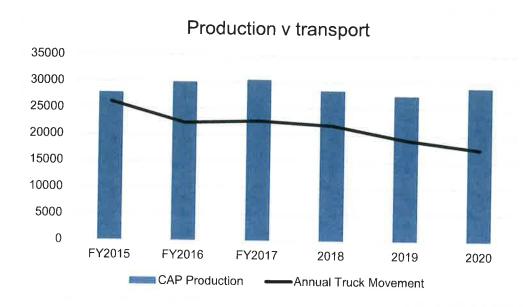


Figure 1: Truck Movements vs Production

Note: Financial year (FY) data provided in Figure 1 is for the October to September period each year. However, data for 2018, 2019 and 2020 are for reporting period between 1 December and 30 November in the year.

9.2 Appendix B – Environment performance

9.2.1 Environmental Performance table

Table 10 details the key environmental performance parameters for the Ixom Botany ChlorAlkali Plant.

Table 10: Environmental Performance

Aspect	Approval criteria / EIS prediction	Performance during the reporting period	Trend / key management implications	Implemented/proposed management actions
Noise	Day – 65 LAeq Evening – 55 LAeq Night - 50 LAeq (Limits from EPL 20547, Section L4.2). Monitoring location 8 in the noise report, is the only location the receiver is impacted by Ixom Operations	Compliant. Noise monitoring from December 2019 to November 2020 was undertaken by Wolfpeak Pty Ltd From the reports, the samplings at location 8 recorded high readings between 58.4 – 66.4, higher than 50 db (A).	Based on the report comments the high results were dominated by sources not related to Ixom site operations. The main contributors were passing traffic (mostly dominant) – between 50 – 86.	No action required
Air quality	There are 3 licenced discharge points at the Ixom Botany ChlorAlkali plant: Point 1 (Figure 2) Hypochlorite Backing Tower. Discharge limit = 200mg/m³ Chlorine, Monitored Continuously Point 2 Absorption Tail Tower. Discharge limit = 30mg/m³ Hydrogen Chloride. Measured quarterly Point 3 (Figure 3) Emergency Chlorine Vent. No discharge limit in EPL, statutory limit from Schedule 4 of the POEO act of 200mg/m³ used for reference. Monitored Continuously	Compliant. Air quality data is reported on the Ixom website each month and is included as the weblink in this section of the report.	Results are consistent with that of previous years. See graphs below. Monitoring results for Point 2 have been consistently below monitoring thresholds, and therefore have not been graphed.	No action required
Vater	See Section 9.2.3 of this re	eport		
Biodiversity	The EIS identified that there was no expected impact on Biodiversity from the operation of the Ixom Botany ChlorAlkali Plant	No impact	None identified	No action required

Heritage	The EIS identified that there was no expected impact on Aboriginal, Natural or Urban Heritage items, relics or places from the operation of the Ixom Botany ChlorAlkali Plant	No impact	None identified	No action required
Flora and Fauna	The EIS indicated that no flora or fauna were expected to be directly affected by the operation of the Ixom Botany ChlorAlkali Plant	No impact	None identified	No action required
Amenity	The premises and operations shall be conducted in such a manner as not to interfere with, or materially affect, the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, vapour, steam, soot, ash, dust, waste water, waste products, grit, oil, or otherwise. The occupier of the premises shall not cause, permit, or allow the emission of any odorous air impurity from the development such that it can be detected outside the property boundaries by its odour. (DA 35/98 conditions 37 and 38)	Compliant. There were no instances of material harm affecting the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, vapour, steam, soot, ash, dust or waste products. There were no reports of odorous material from the development detected outside the property boundaries. There were no community complaints received in the reporting period related to the Ixom Botany ChlorAlkali Plant or its operation.	None identified	No action required

9.2.2 Air Monitoring

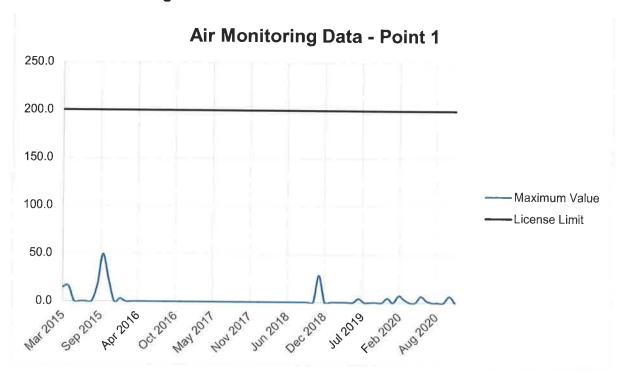


Figure 2: Point 1 Air Monitoring Data March 2015 - November 2020

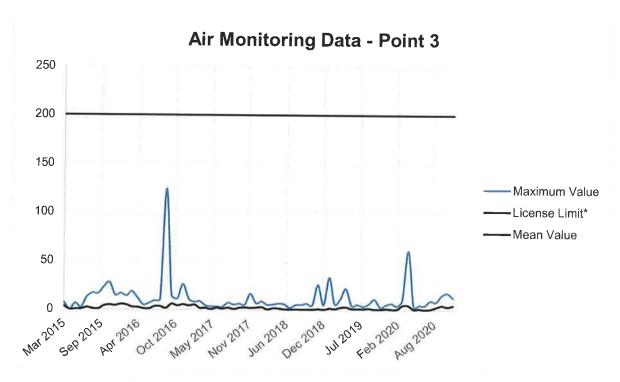


Figure 3: Point 3 Air Monitoring Data March 2015 - November 2020 * Statute limit as per Schedule 4 of POEO (Clean Air) Regulation

Note: Historical data is available through the Ixom website: https://www.ixom.com/being-responsible/environmental-monitoring-data/botany

9.2.3 Water Usage

Potable water is supplied to the Ixom Botany site through the BIP Site Utilities. Water usage for the reporting period is shown in Table 11.

Potable and recycled water consumption was higher over this reporting period than the last, likely due to the higher production and plant demand.

Table 11: Water Usage

	Previous Reporting Period (Dec 2018 – Nov 2019)	Current Reporting Period (Dec 2019 – Nov 2020)
Potable Water Consumed (KL)	67,640	98,564
Recycled Water Consumed (KL)	145,808	162,683
Water Incorporated in Product (KL)	128,959	136,735
Effluent Discharged to BIP Trade- Waste System (KL)	63,203	69,192

The Site Stormwater and Effluent System are managed by BIP Site Utilities.

Effluent from the Ixom ChlorAlkali Plant is collected and processed in one of two automated effluent treatment tanks. These tanks each accumulate the plant effluent then dose acid or caustic into the tanks to control the pH to a consistent and acceptable level. When the target pH is achieved, the tanks are discharged to the EP6 effluent collection pit where flow and pH are continuously measured and recorded. The effluent then joins the other effluent streams from the other facilities at the Botany Industrial Park and flows to the Site Utilities effluent system. In this facility, the effluent is monitored, and the pH adjusted where required to achieve permissible effluent standards before discharge from site.

The stormwater from the facility is collected through clearly labelled stormwater drains and flows to the Site Utilities stormwater system. The stormwater is continuously monitored for flow and pH. If the pH of the stormwater exceeds the permissible limits, the stormwater is automatically diverted to the Site Utilities effluent system where is it further treated through a pH adjustment in order to meet the required specifications prior to discharge.

Figure 4 shows the monthly effluent discharge for the reporting period. There were 3 spikes of the line which were due to number of days having heavy rainfalls. It shows a slight increase in average by month however this is largely contributed to by the three spikes in discharge caused by heavy rain events.

9.2.4 Effluent Discharge

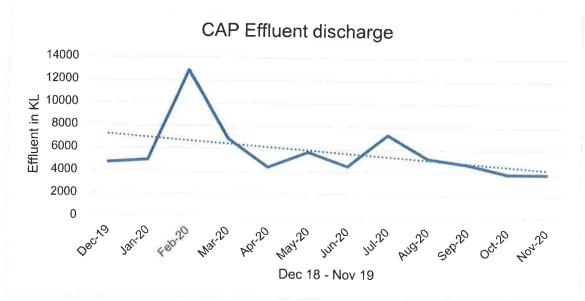


Figure 4: Effluent Discharged from Ixom CAP - Monthly

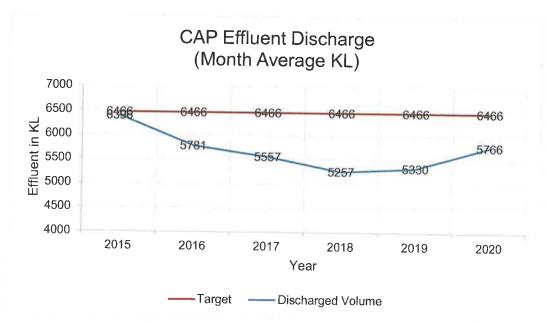
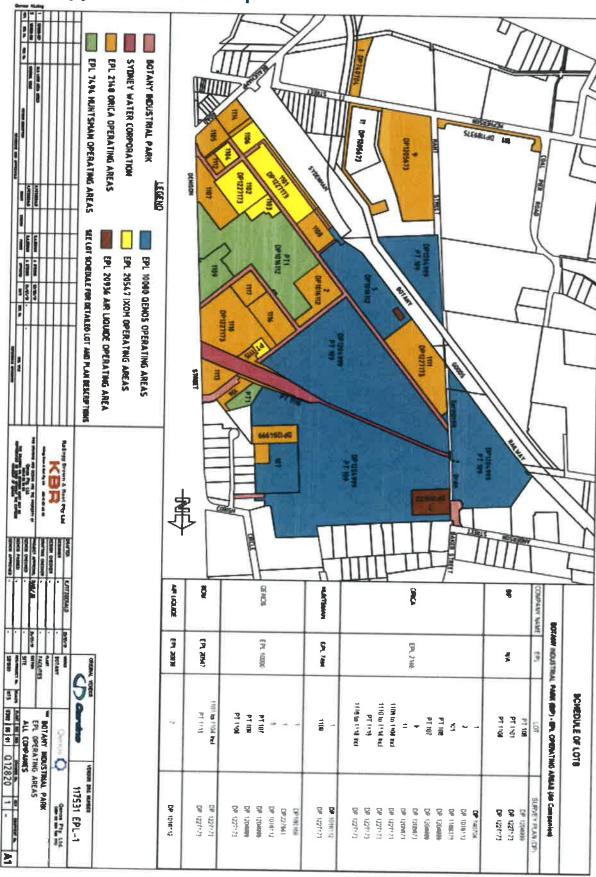


Figure 5: Year on year change in effluent discharged from site

9.3 Appendix C - Site Map



9.4 Appendix D - Declaration

Compliance Report Declaration form

Table 12: Declaration	
Name of operation/ project	Ixom Botany ChlorAlkali Plant
Development consent / project approval #	DA35/98 (ref R98/00010)
Description of consent/ project	Replacement of Chlor-Alkali plant at Botany
Development consent / project address	16-20 Beauchamp Road, Matraville NSW 2036
Name of Operator	Ixom Operations Pty Ltd
Compliance Report	Annual Report 2020
Annual Review End Date	30 November 2020

I declare that I have reviewed relevant evidence and prepared the contents of the attached Compliance Report and to the best of my knowledge:

- the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- the Compliance Report has been prepared in accordance with the Compliance Reporting Post Approval Requirements;
- the findings of the Compliance Report are reported truthfully, accurately and completely;
- due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- the Compliance Report is an accurate summary of the compliance status of the development. Note.
- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information maximum penalty 2 years' imprisonment or 200 penalty units, or both).

Name of Authorising reporting officer	Ian Parker
Title of Authorised Reporting Officer	North East Australia Regional Manager
Signature of Authorised Reporting Officer	lan Porker
	Ixom Operations Pty Ltd
Company and Address	1 Nicholson Street, East Melbourne, VIC 3002