

Section 7.15 List of Proponent Commitments

EIS Section	Context	Commitment
3.5.3	In relation to spill management on site during the operational phase of the project	The chemical storage and handling areas will be bunded and emergency spill kits will be present on site and staff trained in their use. This measure will reduce the mobility of chemical contaminants. Should a major spill event occur, the spilled chemical will be tankered from site by a licensed contractor for disposal. Stormwater collected in each bunded area will be collected in a sump and pumped to the UFRO plant. The collection of the stormwater will not be automated (i.e. it will not drain by gravity) to the pond to ensure that major spills are contained within the bund.
3.5.3	In relation to water supply for the project	The water used during the construction period will be sourced from a third party and outside of the water supply provided to Moranbah. The supply of water for the project will therefore not reduce or impact on the supply to the Moranbah township and will provide for the workforce in both the construction and operational phases of the project.
4.1	Table 1, Outcomes of <i>State</i> <i>Planning Policy 1/03: Mitigating</i> <i>the Adverse Impacts of Flood,</i> <i>Bushfire and Landslide</i> (SPP 1/03): Mitigating the Adverse Impacts of Flood, Bushfire and Landslide	 The proposed ammonium nitrate plant will be designed appropriately to maintain the safety of people and property by mitigating bushfire risk through: allotment design and the sitting of buildings; including firebreaks providing adequate setbacks between buildings/structures and hazardous vegetation; providing adequate road access for fire-fighting/other emergency vehicles and safe evacuation; and providing an adequate and accessible water supply for fire fighting purposes.
4.1	Table 2, (SPP 1/03): Mitigating the Adverse Impacts of Flood, Bushfire and Landslide	The proposed ammonium nitrate plant will minimise, as far as practicable, the adverse impacts from natural hazards. Management practices will be employed during operation of the plant, to ensure risks to people or property are minimised.
4.1.2	Table 6, Mitigation measures	DN will undertake all reasonable and practicable measures to minimise contamination of land or waters.



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4.3.1	Water quality monitoring	Water quality monitoring will be undertaken during Grosvenor Creek flow events prior to and during construction activities.
4.5	Waste minimisation	The project will comply with all regulatory requirements and aim to adopt best waste management practices and go beyond compliance where economically feasible options are identified. DN accepts the principals outlined in the <i>Environmental Protection (Waste Management)</i> <i>Policy</i> , specifically the "polluter-pays principal" which illustrates that the company will take responsibility for the management of wastes generated from the facility and/or as part of the manufacturing process. To best manage waste DN will adopt the waste management hierarchy as outlined in the <i>Environmental Protection (Waste Management) Policy (2000)</i> .
4.5	Waste	DN intends to comply with all regulations outlined in the <i>Environmental Protection (Waste Management)</i> <i>Regulation (2000)</i> , and adopt the objectives of the legislation into the plants waste management practices. Specifically "minimising the impact of waste on the environment" and "…manage waste under principals of ecologically sustainable development".
4.5	Waste	The waste management methodology adopted by DN is to follow the principles provided in the Environmental Protection (Waste Management) Policy 2000. Waste will be managed in the following order of preference: 1. waste avoidance;
		2. waste re-use;
		3. waste recycling;
		4. energy recovery from waste, and
		5. waste disposal
4.5.2	Waste	Construction wastes will be divided into hazardous or non-hazardous in accordance with applicable Queensland regulations.
4.5.2	Waste	A waste management plan will be included in the Construction Environmental Management Plan and clearly identify waste streams, storage and final disposal

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		point. All attempts will be made to recycle materials where services area available.
4.5.2	Waste	The construction wastes (approximately 30 ³ m) will be removed from the proposed project site on a weekly basis with the regulated waste disposed of through an appropriately licensed contractor a number of which operate in the area.
4.5.2	Waste	DN will ensure all chemicals are stored and handled in compliance with the relevant Dangerous Goods Codes and Australian Standards for storage (e.g.: AS1940). The chemical storage will be bunded in accordance with AS1940, emergency spill kits will be provided and staff will be trained in their use.
4.5.2	Waste	Stormwater collected in each bunded area will be collected in a sump and diverted to the proposed evaporation pond through an oil water/separator, as the rainwater will be potentially contaminated. The collection of the stormwater will not be automated (i.e. it will not drain by gravity) to the pond to ensure that major spills are contained within the bunded areas on site.
	Waste	Oil/water separators will be used to treat contaminated stormwater from the compressor and turbine bunded area and oil /diesel storage areas prior to draining towards the evaporation pond.
	Waste	The domestic sewage for the site is treated by on-site sewage systems utilising septic tanks as the primary settling process unit. These systems shall be designed, constructed and operated according to relevant regulations
4.12	Safety	Whilst the risk of significant fire or explosion is low onsite, fire-fighting facilities such as hydrants with hoses will be provided consistent with normal practice. Fire fighting equipment will be fitted to ensure that the plant operators are able to fight fires and rapidly provide cooling water to at risk equipment.
		Safety equipment including firewater monitors with fogging nozzles, hydrants, mobile and portable fire extinguishers, protective clothing and self-contained



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		breathing apparatus will be provided where required. The management procedures for dealing with fires from the facility will be developed with the Rural Fire Brigade operating around Moranbah to ensure an integrated approach to fire fighting.
		Staff will be trained in emergency response procedures including in the event of a fire at the AN Plant or nearby.
4.12	Mosquito abatement	DN will minimise the number of potential mosquito breeding sites created on-site by preventing water from ponding. Strategies to minimise the potential impacts from mosquitoes will be based on "Guidelines to Minimise Mosquito and Biting Midge Problems in New Development Areas" (Queensland Health, 2002) and include the following:
		 Ground surface preparation and earthworks will prevent the ponding of water;
		 Pools of stagnant water will be drained and/or the areas filled;
		 Storage containers capable of ponding water will be either discarded after use or stored in an inverted position (care will be taken to ensure that ponding does not occur in rubbish storage areas);
		 All sedimentation dams, ponds and on-site excavations filled with water will be inspected for the presence of mosquito larvae on a regular basis;
		 Erosion and washdown practices will be controlled to prevent sediment and debris forming standing water pools in natural water courses adjacent to the site. (Mosquitoes will not breed in flowing water); and
		 If larvae are detected in large numbers, the SH&E representative will contact the Queensland Health and Belyando Shire Council for assistance in selecting and implementing suitable control methods.
4.13.3	Air Pollution and Greenhouse Gas emission reduction (Note	» The most significant air pollutants associated with the plant are oxides of nitrogen in the nitric acid and



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	that NO and NO ₂ are not GHG; N ₂ O is a GHG). If this section is about GHG's, don't mention pollutants. There is CO_2 from the ammonia plant and N ₂ O from the Nitric Acid Plant	ammonia plant emissions, although these may be insignificant as greenhouse gas. The oxides of nitrogen emissions from the Nitric Acid Plant are expected to contain significant amount of nitrous oxide. However, well-established catalysts are used to minimise these emissions. The activity of the catalysts will be closely monitored to ensure that emission levels are kept to a minimum. Catalysts will be regenerated as required and replaced during the operation of the plant with best available catalysts to improve NOx reduction;
		» Plants will be operated by DN in accordance with best available practice. DN is a major supplier and manufacturer of ammonium nitrate prill and emulsion and operates a number of plants in Australia to international standards.
		In order to monitor and minimise greenhouse gas emissions from the plant, DN will:
		 Maintain an inventory of greenhouse gas emissions for the project once operation starts, by monitoring use of electricity, liquid and gaseous fuels and other direct and indirect emissions;
		 Publicly report greenhouse emissions and progress on greenhouse mitigation measures; and
		 Obtain and maintain membership of the Commonwealth Government Greenhouse Challenge Program.
4.13.8	In relation to ammonia storage on site	Dyno Nobel will use double walled tanks for the ammonia storage.
4.13.8	In relation to management of SSAN	DN will use management plans it developed for the management of SSAN at its operation in Moura.
4.13.8	In relation to management of AN	The following recommendations will be adopted by DN for incorporation into the final AN Plant design:
		 The largest explosive/flammable consequence distance from the project is from an AN Prill explosion. Given an explosion event involving 6,000 T of Prill, the overpressure impacts conservatively reach a distance of 792 m at 21 kPa overpressure. As the Emulsion Plant is



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		directly adjacent to the AN and Ammonia Facilities, the potential for knock-on effects needs to be further explored at the detailed analysis phase.
		2. Dyno Nobel Asia Pacific Limited will introduce a minimisation program to reduce, by engineering design, the number of small-bore fittings, valves, and flanged joints on equipment operating with toxic chemicals, as these items constitute the greatest proportion of leaks likely to affect offsite areas. This reduces the volume stored and potential leaks. This matter should also be addressed in the development of the piping material specification. Screwed joints will not be used.
		3. The Quantitative Risk Analysis will be updated once the facility design is finalised and the Safety Management System (SMS) modified via the Major Hazard Facility Safety Case. The update will incorporate onsite risks and any potential changes to the population in the area since the PRA was completed.
		4. Undergo further investigation into the World's best practice will be adopted for the storage of Ammonia – considering the filling points, pumps and their location and the level of integrity required (material specification, double/single walled tanks), in order to ensure the risks associated with the Ammonia Storage are reduced to a level as low as reasonability practical.
		 The AN Prill Storage location, design and layout will be optimised for safety wherever practical. Factors that will be included in this optimisation are type of storage (drums, shed, domes) and separation between stockpiles.
		All security measures will be put in place to prevent theft or loss of inventory.
5	Environmental management	Dyno Nobel Asia Pacific Limited shares the community's desire to protect and preserve the environment. DN is committed to facilitating material recycling, waste



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		minimization, energy conservation and pollution prevention. DN has an Environmental Management System (EMS) in place. The EMS is summarised in Section 5 of this EIS.
	Environmental management	Dyno Nobel Asia Pacific Limited will give due consideration to the likely environmental impacts of the project under various Commonwealth, State and Local government legislation, guidelines and policies.
	Environmental management	All personnel directly involved in environmental management will be appropriately qualified and experienced to undertake their relevant tasks. All employees will receive environmental induction training prior to commencement of work on this project
	Environmental management	Commitments and responsibilities for the Environmental Management Plan are detailed in Section 5 of this EIS.