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BRISBANE QLD 4000

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14/12/2023
APPLICATION REF
A006129295

14 December 2023

The Assessment Manager
Brisbane City Council
266 George Street
Brisbane QLD 4000

Attention: Clifford Shoesmith – A/Principal Urban Planner
Delivery via email: Clifford.Shoesmith@brisbane.qld.gov.au

Dear Clifford,

RESPONSE TO OUTSTANDING MATTERS ADVICE FOR DEVELOPMENT APPLICATION AT 282 PARINGA RD MURARRIE QLD 4172 (COUNCIL REFERENCE: A006129295)

We write to you on behalf of *Incitec Pivot Limited* ('the Applicant'), in response to the 'status update' letter dated 9 November 2023 issued by Brisbane City Council in relation to the abovementioned development application (Council Ref.: A006129295).

The outstanding matters noted in Council's abovementioned letter are provided in italics. Responses to each of these matters is provided further below.

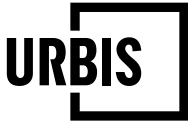
FLARE SELECTION

- a) *On finalisation of the flare selection, provide the parameters for the ammonia plant flare and ammonia storage tank BOG compressor flare including actual stack height and diameter (not the modelled effective parameters), and manufacturer's/supplier's specification on NOX emissions (such as being 2% by weight of the ammonia flared).*

Response:

The flare modelling undertaken by Katestone Environmental utilise industry accepted methodology with conservative assumptions on flare performance. The choice of specific supplier and the final flare design has not yet been undertaken and will not be for some time with the final selection dependent on commercial procurement issues, equipment availability and bespoke design modifications that may be required to meet performance parameters.

The modelled outcomes are functional and conservative and will be able to be achieved based on similar plant performance – but as yet, Incitec Pivot cannot nominate a specific equipment provider. It is notable that the modelled emission outcomes shown in Tables 11 – 13 of the Katestone Environmental IPL Ammonia Plant Air Quality Assessment report (17 March 2023) are well below the nominated limits stipulated by City Plan 2014 *Table 9.3.12.3.B—Air quality (planning) criteria* – both in isolation and cumulative.



Accordingly, it is advised that Incitec Pivot will accept an approval condition that requires the final flare section to be compliant with modelled and accepted emission criteria.

A suggested approval condition is:

“Flare emissions are to be consistent with the modelling outcomes as contained within the Katestone Environmental IPL Ammonia Plant Air Quality Assessment report (17 March 2023). An updated air quality assessment demonstrating compliance with City Plan 2014 Table 9.3.12.3.B based on emission performance of the actual plant equipment shall be provided to Development Services.

Timing: Prior to commencement of use.

- b) *Confirmation whether the modelled effective flare parameters are still representative estimates of the actual stack parameters.*

Response:

It is confirmed that the modelled effective flare parameters are still representative estimates of the actual stack parameters. This is to be confirmed via condition compliance documentation as per the suggested condition as outlined above.

State Assessment and Referral Agency (SARA) referral agency response dated 30 August 2023 given under section 56 of the Planning Act 2016 includes reference to the drawing numbered “GI-QO3-40350 prepared by CB&I dated 17 May 2023, reference 251780-000-PI-01-000001, Revision E”.

Response:

It is confirmed that the plan as referenced in the SARA referral response remains the current design commitment for the project.

IPL remains in current negotiation with BAC and federal aviation regulators to resolve the plume emission PANS -Ops incursion issue. Further advice on the agreed outcome will be provided in due course as the final issue to resolve prior to BCC deciding the application.

If you have any questions regarding this material or wish to discuss the application further, please do not hesitate to contact the undersigned or Sam Robinson on +61 7 3007 3844.

Yours sincerely,

A handwritten signature in black ink, appearing to read "SB", with a long horizontal flourish extending to the right.

Steve Buhmann
Associate Director
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sbuhmann@urbis.com.au