

Environmental Remediation

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30 October 2015

Ms Penny Armytage
Chairperson
Ministerial Advisory Committee
Inquiry into the Environmental Protection Authority
P.O. Box 21428
Little Lonsdale Street, VIC 8011
(by email: info@epa-inquiry.vic.gov.au)

Dear Ms Armytage

**RE: SUPPORT OF SUBMISSION FROM ENVIRONMENTAL AUDITORS –
STREAMLINING PROCESSES FOR DECLARATION OF A GQRUZ AND
DETERMINATION OF CUTEP**

Orica Limited (Orica) has been made aware of a submission by the Environmental Auditors for Contaminated Land on improvements to groundwater policy application by EPA Victoria for declaration of a Groundwater Quality Restricted Use Zone (GQRUZ) and determination of Clean Up to the Extent Practicable (CUTEP).

Orica has a number of sites (directly or through joint venture companies) that have been through, or are part-way through, environmental audits under Section 53V of the Environment Protection Act and consequent clean up under Clean Up Notices. These sites are:

1. 295 Whitehall Street, Yarraville¹;
2. Pigment Manufacturers of Australia Ltd, Leakes Road, Laverton²;
3. Mt Derrimut, Deer Park nitrate plume; and
4. Altona Properties Pty Ltd³, Kororoit Creek Road, Altona⁴.

¹ Now 325 Whitehall Street, Yarraville

² 50:50 joint venture with BASF Australia. Orica manages environmental remediation for the JV

³ Joint venture with PolyOne Corporation.

⁴ Auseon Limited is the responsible party for environmental remediation.

Orica strongly supports the submission from the Environmental Auditors seeking amendments to EPA Victoria's administration of groundwater policy to enable:

- a) determination of CUTEP and declaration of GQRUZ as outcomes available from the Section 53V Audit process;
- b) declaration of a GQRUZ from information made available to EPA Victoria from all sources.

Orica also notes that State Environmental Protection Policy (Groundwaters of Victoria) clause 9.1(2)(d) allows the EPA to determine that certain groundwater beneficial uses in Table 2 may not apply where a GQRUZ has been determined. The lack of declared GQRUZs and an easily accessible database system means that the existence and impact of contamination from other "off-site" sources is not being adequately recognised, which can in turn lead to wasted effort in repeat investigation of contamination issues, and/or consideration of restoration of beneficial uses when this is inappropriate.

Orica would be pleased to discuss these matters further with the Ministerial Advisory Committee if you feel that would be of benefit to its deliberations.

Yours sincerely



James Fairweather
Manager Environmental Projects, Environmental Remediation

copies (by email):

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