

Mr Colin Reid
Director, Water
Independent Pricing and Regulatory Tribunal
Level 8, 1 Market Street
SYDNEY NSW 2000



Dear Mr Reid *Colin*

I am writing regarding Orica Pty Ltd's licence application under the *Water Industry Competition Act 2006* for network operator's and retail supplier's licences for the ground water treatment plant and supply of recycled water for industrial uses in the Botany area of Sydney.

In principle NSW Health supports Orica's application for a licence. However, NSW Health would like to see additional information in relation to health risks with the current proposal. The report provided by Orica *Groundwater Treatment Plant EIS Human Health Risk Assessment* (November 2004) indicated that there would be no additional risk to the surrounding areas from the ground water treatment plant but did not cover the uses of the treated water i.e. boiler feed, cooling tower and wash down that are listed in the application. NSW Health has on file Orica's report titled *Use of Treated Ground Water – Assessment of Risk to Human Health and Environment* dated 18 March 2008. This report would be more relevant to addressing the current risk and it is recommended that it is included as part of the application.

To be able to assess the reliability of the treatment process and to determine if the final water quality matches the assumptions made in any health risk assessment, NSW Health would like to see an outline of Orica's current treated water monitoring program. This information should include sample site code, parameters tested, required compliance value and average yearly monitoring results since the commencement of the supply of water.

Thank you for the opportunity to make a submission. Should officers of IPART require further information, please contact Dr Kaye Power at the Water Unit, NSW Department of Health on (02) 9816 0541.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Byleveld'.

Dr Paul Byleveld
A/Director, Environmental Health Branch

27 January 2011