



State Environmental Planning Policy No. 33

11 & 13 Percy Street, Auburn

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11 & 13 Percy Street, Auburn

Woolworths Limited

Prepared by

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Quality Management

Rev	Date	Remarks	Prepared By	Reviewed By
A	1 July 2020	Draft issue for comment	Renton Parker	Steve Sylvester
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1	3 December 2020	Included other DG classes		

Executive Summary

Background

Woolworths Limited (Woolworths) has proposed to occupy a warehouse located at 11 & 13 Percy St, Auburn to house a range of beverage products including beer, wine and spirits. The site has been issued Secretary Environmental Assessment Requirements (SEARs) which require the site to have a State Environmental Planning Policy No. 33 (SEPP 33) assessment performed to determine whether the facility is potentially hazardous and whether additional risk assessment is required.

Woolworths has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 13 Percy St, Auburn.

Conclusions

A review of the quantities of DGs stored at the proposed warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

Recommendations

Notwithstanding the above conclusions, the following recommendations have been made:

- The DG storages shall be subject to a DG assessment against AS 1940-2017 to ensure compliance with the standard as required by the Work Health and Safety (WHS) Regulation 2017.
- The flammable liquid storage shall be subject to a hazardous area classification per AS/NZS 60079.10.1:2009 to ensure ignition sources are not introduced into a hazardous area as required by the WHS Regulation 2017.
- All operational documentation required by the WHS Regulation 2017 (i.e. risk assessment, manifest, register, emergency response plan, notification, etc.) shall be prepared for the site prior to occupation.

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Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
DA	Development Application
DGs	Dangerous Goods
DPE	Department of Planning and Environment
SEPP	State Environmental Planning Policy

1.0 Introduction

1.1 Background

Woolworths Limited (Woolworths) has proposed to occupy a warehouse located at 11 & 13 Percy St, Auburn to house a range of beverage products including beer, wine and spirits. The site has been issued Secretary Environmental Assessment Requirements (SEARs) which require the site to have a State Environmental Planning Policy No. 33 (SEPP 33) assessment performed to determine whether the facility is potentially hazardous and whether additional risk assessment is required.

Woolworths has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 13 Percy St, Auburn.

1.2 Scope of Services

The scope of work is to prepare a SEPP 33 assessment for the site located at 11 & 13 Percy St, Auburn. The assessment does not include any other sites or the preparation of any additional planning studies should they be required.

2.0 Methodology

2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [1]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33 (Ref. [1]).
- Report on the findings of the SEPP 33 assessment.

2.2 Data taken from “Applying SEPP 33”

Figure 2-1, extracted from “Applying SEPP 33” provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold (Ref. [1]).

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
LPG (underground)	table 3
2.3	table 3
3PGI	Figure 8 graph if greater than 2 tonne
3PGII	Figure 9 graph if greater than 5 tonne
3PGIII	Figure 9 graph if greater than 5 tonne
4	table 3
5	table 3
6	table 3
7	table 3
8	table 3

Figure 2-1: Screening Method to be Used

Table 3 from “Applying SEPP 33” has been extracted and is shown in **Figure 2-2**.

Class	Screening Threshold	Description
1.2	5 tonne	or are located within 100 m of a residential area
1.3	10 tonne	or are located within 100 m of a residential area
2.1	(LPG only — not including automotive retail outlets ¹)	
	10 tonne or 16 m ³	if stored above ground
	40 tonne or 64 m ³	if stored underground or mounded
2.3	5 tonne	anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale
	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
	2.5 tonne	chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg
	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
4.2	1 tonne	
4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Figure 2-2: General Screening Threshold Quantities

Transportation screen thresholds have been provided in **Figure 2-3**.

Class	Vehicle Movements		Minimum quantity*	
	Cumulative	Peak	per load (tonne)	
	Annual	or Weekly	Bulk	Packages
1	see note	see note	see note	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	10	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	2	5
6.1	all	all	1	3
6.2	see note	see note	see note	
7	see note	see note	see note	
8	>500	>30	2	5
9	>1000	>60	no limit	

Figure 2-3: Transportation Screening Thresholds

3.0 SEPP 33 Review

3.1 Proposed Storage Details

Initial review of the site operations indicated minimal quantities of DGs would be stored at the facility; however, to ensure any changes to future operations which may include additional DGs being stored are fully captured, quantities have been specified in excess of what is currently being stored. Provided in **Table 3-1** is an assessment of whether the Class is subject to SEPP 33.

Table 3-1: DG Classes or Materials Stored and Maximum Quantities

Class	Description	PG	Quantity (kg)	Class Subject to SEPP 33 (Y/N)
2.1	Aerosols, flammable	n/a	3,500 / 875^	Y
2.2	Aerosols, non-flammable	n/s	150	N
3	Flammable liquids	III	45,000	Y
4.1	Flammable solid	III	75	Y
5.1	Oxidising Agent	III	75	Y
8	Corrosive substance	II	770	Y
9	Miscellaneous DGs	III	20	N

^Based upon 25% of the package weight being flammable propellant

*Density has been calculated based upon spirits containing 40% ethanol by volume resulting in a density of 915 kg/m³

3.2 Application of State Environmental Planning Policy No.33 – Hazardous and Offensive Developments

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) has been developed under the Planning and Assessment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning and Environment in the conditions of consent.

3.3 Data taken from “Applying SEPP 33”

Figure 2-1, extracted from “Applying SEPP 33” provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold.

- Flammable liquids are classified as Class 3 DGs; hence, Figure 9 shall be used.

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
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6	table 3
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Figure 3-1: Screening Method to be Used

Table 3 from “Applying SEPP 33” has been extracted and is shown in **Figure 3-2**.

Class	Screening Threshold	Description
1.2	5 tonne	or are located within 100 m of a residential area
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2.1	(LPG only — not including automotive retail outlets ¹)	
	10 tonne or 16 m ³	if stored above ground
	40 tonne or 64 m ³	if stored underground or mounded
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	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
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	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
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4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Figure 3-2: General Screening Threshold Quantities

3.3.1 Storage

Threshold limits for the application of SEPP 33 are presented in **Table 3-2** along with maximum DG quantities that will be stored. The only Class assessable is Class 3 which is based upon distance from the storage to the site boundary. Based upon **Figure 3-3** the distance required from the storage to the site boundary is 8 m. A review of the boundaries at the site indicates the closest boundary is 10 m away on the north eastern side. Therefore, the storage is less than the SEPP 33 threshold; hence, no further assessment is required.

Table 3-2: Quantities Stored and SEPP 33 Threshold

Class	Description	PG	Quantity (kg)	SEPP Threshold (kg)	Does SEPP 33 (Y/N)
2.1	Aerosols, flammable	n/a	3,500 / 875^	10,000	N
3	Flammable Liquids	III	45,000	Distance based (refer to Figure 3-3)	N
4.1	Flammable solid	III	75	5,000	N
5.1	Oxidising Agent	III	75	5,000	N
8	Corrosive substance	II	770	25,000	N

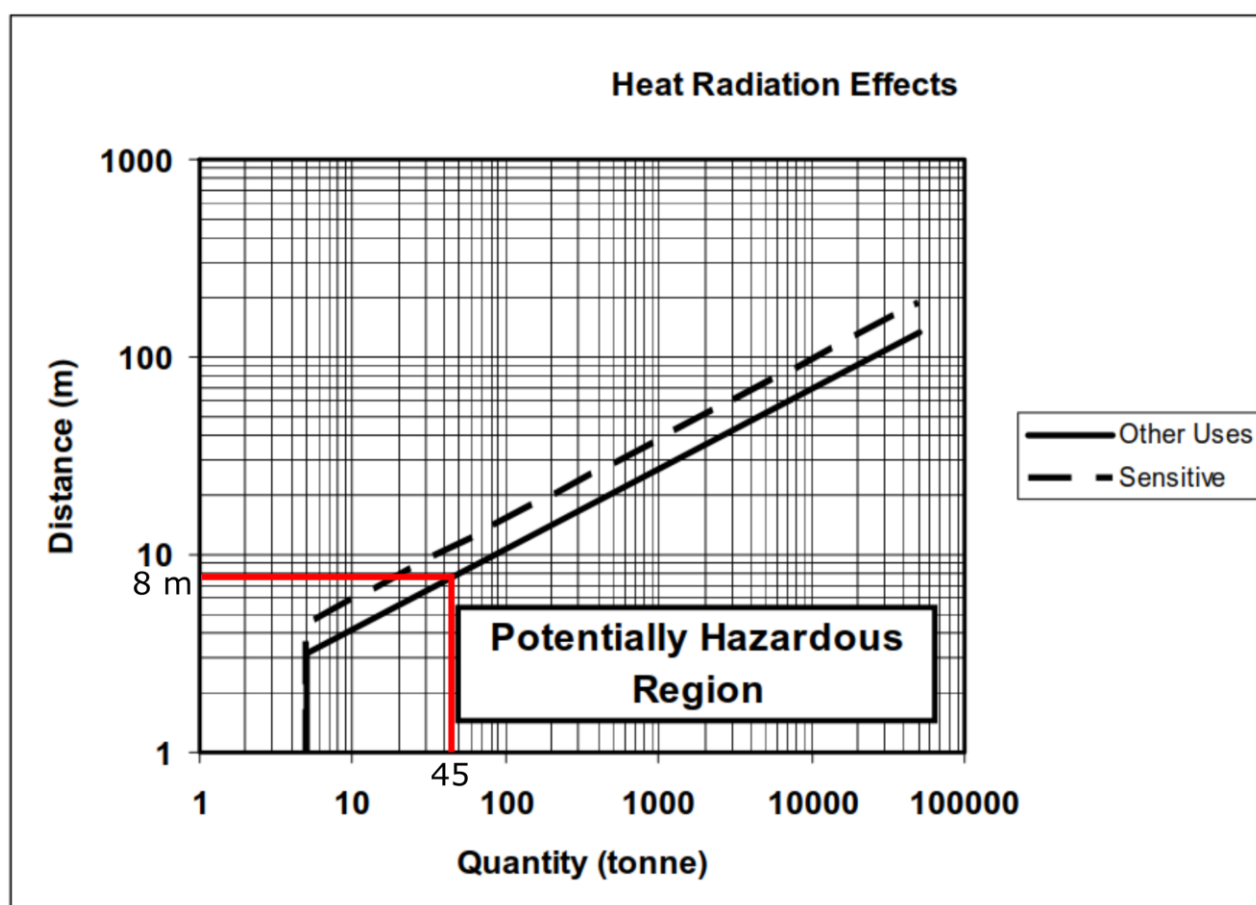


Figure 3-3: Class 3 SEPP 33 Distance

3.3.2 Transport

Table 2 from Applying SEPP 33 has been extracted and reproduced in **Figure 3-4**. The flammable liquids stored are in packages and are PG III which indicates there is no limit on the number of deliveries which can occur. However, the other DG classes do have limits which far exceed the actual quantity stored at the site. Therefore, the site would not exceed the SEPP 33 transport limits.

Class	Vehicle Movements		Minimum quantity*	
	Cumulative	Peak	per load (tonne)	
	Annual	or Weekly	Bulk	Packages
1	see note	see note	see note	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	10	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	2	5
6.1	all	all	1	3
6.2	see note	see note	see note	
7	see note	see note	see note	
8	>500	>30	2	5
9	>1000	>60	no limit	

Figure 3-4: Transportation Screening Thresholds

4.0 Conclusion and Recommendations

4.1 Conclusions

A review of the quantities of DGs stored at the proposed warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

4.2 Recommendations

Notwithstanding the above conclusions, the following recommendations have been made:

- The DG storages shall be subject to a DG assessment against AS 1940-2017 to ensure compliance with the standard as required by the Work Health and Safety (WHS) Regulation 2017.
- The flammable liquid storage shall be subject to a hazardous area classification per AS/NZS 60079.10.1:2009 to ensure ignition sources are not introduced into a hazardous area as required by the WHS Regulation 2017.
- All operational documentation required by the WHS Regulation 2017 (i.e. risk assessment, manifest, register, emergency response plan, notification, etc.) shall be prepared for the site prior to occupation.

5.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] NSW Department of Planning and Environment, "Applying SEPP33 – Hazardous and Offensive Developments," NSW Department of Planning and Environment, Sydney, 2011.