

Consultants Advice Notice

Project:	Ardex Australia SEPP 33	Ref No.:	RCE-21117
From:	Lucy Jimenez	Date:	9/02/2022
	Steve Sylvester	Revision:	0
Attention	Company	Email	
To:	Cameron Gray	Willow Tree Planning	cgray@willtp.com.au
RE: ARDEX Warehouse and Manufacturing Facility (SSD-25725029)			

1.0 Response to Comments from DPIE

No.	Comment	Response
1.a.	The Department highlights that there were inconsistencies in separation distances used for preliminary risk screening of flammable liquids in the SEPP 33 Report. On page 6 of the SEPP 33 Report, describes 9 metres separation for risk screening of flammables. In Figure 3-1 of the SEPP 33 Report, the smallest distance is 12 metres to site boundary and in Figure 3-4, 16 meters separation is applied for preliminary risk screening. As such the Department is unclear on validity of the preliminary risk screening of flammable liquids given the smallest separation from the warehouse to the site boundary is 12 metres.	The report has been corrected such that the assessment of flammable liquids has been conducted using a separation distance of 12 m. Please note that in the review process, the quantity of Class 3 DGs to be stored has been reduced. The original DG storage quantities were based on Ardex acquiring a business which required the storage of a range of DGs similar to the DGs stored, handled and processed by Ardex. This business venture is no longer being pursued and, hence, the quantities of DGs have been reduced to those listed in the updated SEPP33 study.
1.b.	From Table 3-1 of the SEPP 33 Report the DG Class 8 are listed as two (2) packing groups. Packing Group II (13,302kg) and Packing Group III (21,297kg). As per "Applying SEPP33", page 16, where a DG class of differing packing groups are "kept on site in the same general location" then the most hazardous packing group is applied to total class storage. As such the DG Class 8 material should be totalised as Packing group II (34,599 kg) and would exceed the threshold quantities in "Applying SEPP 33"	The report has been updated such that PG II and PG III Class 8 substances are assessed together. Please note that in the review process, the DG quantities to be stored at the facility have been reduced, therefore the SEPP 33 thresholds are not exceeded (see 1a above).

No.	Comment	Response
1.c.	The Department seeks clarification on whether any of the Class 9 or other hazardous materials are defined as a combustible liquid C1 (as classified by AS 1940) and stored at the proposed development. We request the Applicant provide any quantity of combustible liquid C1 to be stored at the proposed development. As per “Applying SEPP33”, page 16, where combustible liquids C1 are kept within a store with flammable liquids they are treated as DG Class 3 PGIII and must be added to the flammable liquids’ quantity when undertaking the preliminary risk screening	A review of the SDS of the Class 9 DGs indicates that no combustible liquids (C1) will be stored.
2	The proposed development will incorporate an office space. The Department highlights that these offices would be classified as an on-site protected place by Australian Standards for the handling of DGs. The Department seeks information on separation of the warehousing areas (containing DGs) to the offices, noting the requirements of Australian Standards for storage and handling DGs.	<p>DGs will be stored in the Class 3 Store, in the Raw Materials (RM) warehouse and in the Finished Goods (FG) warehouse. The required separation distances are as follows:</p> <ul style="list-style-type: none"> • <u>Class 3 DG Store</u>: 10 m separation is required as per Table 4.1 of AS 1940–2017. • <u>FG/RM Warehouse</u>: As only manufactured products in retail-size packages are stored in this area, it has been classified as a retail distribution centre (RDC) under AS/NZS 3833:2008. RDCs do not have specified separation distances to protected places. However, as per Clause 3.2.5(e) of the standard, the walls of the warehouse adjacent to offices shall be constructed of fire walls with an FRL of 60/60/60. <p>As shown in Figure 1-1, these separation distances have been met.</p>

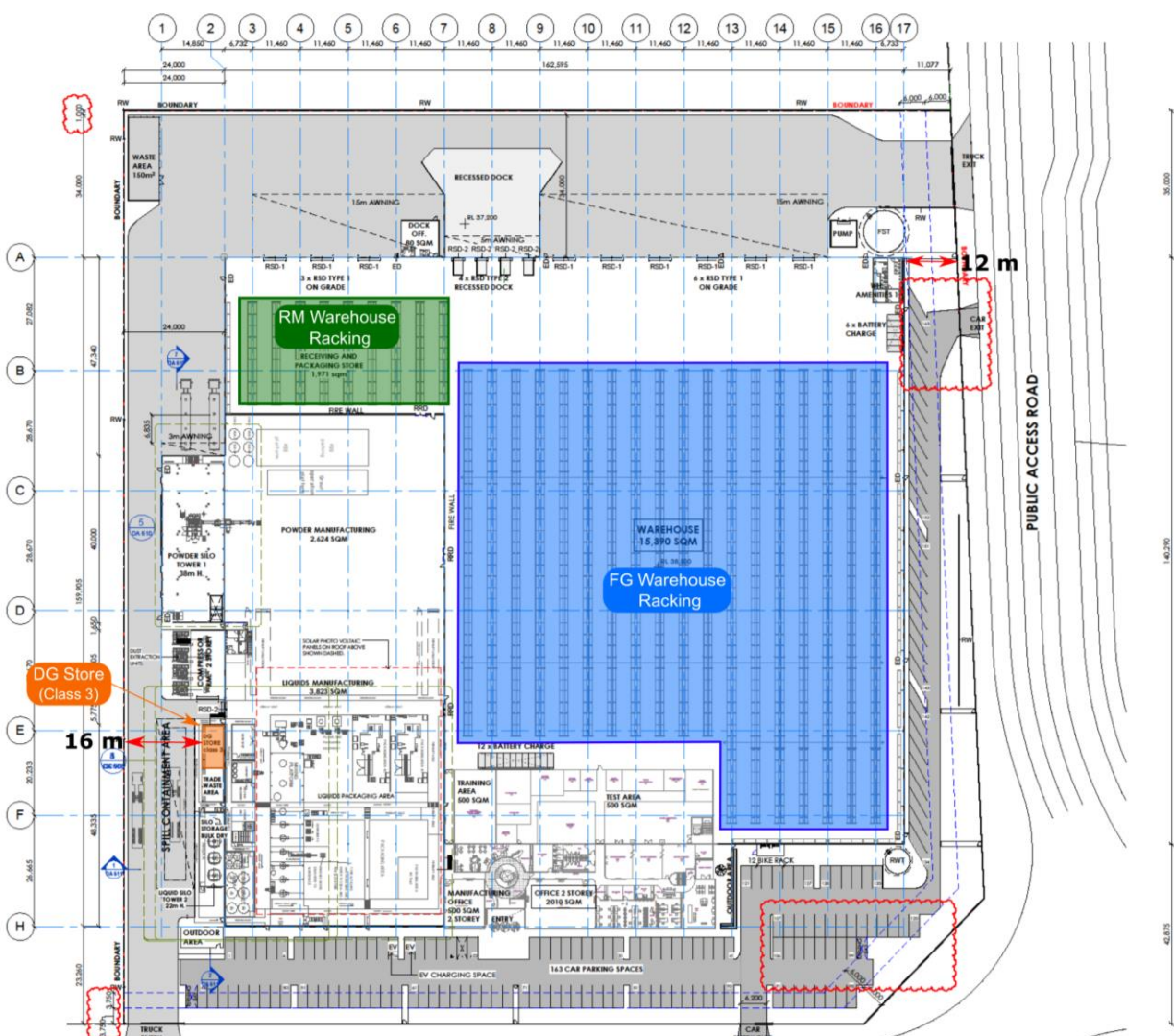


Figure 1-1: Proposed Site Layout