



File ref. no: FRN18/2421 BFS18/3335 (5471)
Doc. ref. no: D18/89084
Contact: Brendan Hurley

Rose-Anne Hawkeswood
Department of Planning & Environment
320 Pitt Street
SYDNEY NSW 2001

11 December 2018

Dear Madam

Re: HPRM: Port Kembla Gas Terminal (CSSI 9471) - Invitation to Comment

Fire & Rescue NSW (FRNSW) would like to make the following comment;

1. FRNSW recommend a Fire Safety Study be prepared in accordance with the Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 – Fire Safety Study Guidelines and be submitted as part of the required consultation process with Fire and Rescue NSW (FRNSW).
2. Further details of the following measures should be detailed as part of the Fire Safety Study, to demonstrate the effectiveness of these measures in mitigating the risks associated with the major hazards and scenarios on site:
 - The proposed Safety Management System and the Computerised Maintenance Management System (CMMS)
 - Systems used to prevent loss of containment, which have been noted to include:
 - + Fire and gas detection
 - + Process control ESD system
 - + Emergency disconnection system for ship to shore transfer
 - + Blowdown system
 - + Active and passive fire protection systems
 - Compliance and standards for meeting the relevant hazardous area classification requirements

3. Isopleth diagrams be provided in the Fire Safety Study to illustrate all consequence analysis presented in the PHA which could affect the activities of the emergency services, including radiant heat flux and overpressure distances.

Note: This will assist Emergency Services in assessing the appropriate exclusion zones for the members of the public.

4. Table 10-1 of the PHA concludes that the development could potentially impact on the nearest identified active open spaces, which includes sporting complexes. It is recommended that the consequence analysis for this scenario (including the appropriate isopleth diagrams) be included as part of the consequence analyses presented in the Fire Safety Study. Additional fire safety measures should also be provided as far as is reasonably practicable to address the risk to these spaces.
5. Details of the safety and operating conditions for the addition of odourant to NG after regasification be made available.
6. Further details on the review of Port Kembla firefighting service with relation to Berth firefighting capacity and Fire Fighting Tugs (FFT) be made available.

Yours faithfully,



Michael Henly
Manager Infrastructure Liaison Unit
Community Safety