

File Ref. No: BFS18/2116 (4303)
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 Contact: Station Officer Mark Castelli

23 August 2018

The Department of Planning & Environment
 C/- Emma Barnet
 GPO Box 39
 SYDNEY NSW 2001
 E: emma.barnet@planning.nsw.gov.au

Dear Ms Barnet,

**Environmental Impact Statement (EIS)
 Enirgi Battery Recycling Facility (SSD 6619)
 509 Byrnes Road, Bomen**

I refer to the above EIS which is currently on public exhibition on the NSW Department of Planning & Environment's (the Department) website. Fire & Rescue NSW (FRNSW) have reviewed Sections 11 and 12 of the EIS, the following comments and recommendations are submitted for consideration.

We note that Tables 11-1 and 11-3 of Section 11 of the EIS confirm that a number of dangerous goods proposed to be stored, processed and transported to and from the site will exceed the screening thresholds in State Environmental Planning Policy No.33 (SEPP 33). Consequently, a preliminary hazard analysis is required to be submitted with the proponent's development application.

The facility's location is within a FRNSW Fire District. FRNSW operational capability within the Bomen/Wagga locality is limited due to the amount of permanent and retained FRNSW resources assigned to the subject locality. Further, the level of operational assistance able to be provided to FRNSW during a significant fire incident by the NSW Rural Fire Service (RFS) is also limited. Therefore, it is important that the facility achieves a high level of on-site independence with respect to the suite of selected on-site fire safety systems.

Based upon FRNSW experience, the proposed firefighting strategy (which principally relies upon the facility's proposed fire hydrant system in conjunction with FRNSW intervention) is considered inadequate. It is FRNSW opinion that the proposed fire strategy relies almost exclusively upon the facility's on-site fire hydrant system, and FRNSW tactical interventions that would utilise the hydrant system, as the primary fire suppression control measure.

Due to FRNSW limited local operational capability and the nature of the dangerous goods managed on-site, there is significant potential for a fire event at the subject facility to escalate to a magnitude where it would be challenging for local FRNSW personnel to safely and efficiently resolve. This is especially the case when compared to a facility that achieves a satisfactory level of fire safety independence by selecting an appropriate suite of on-site fire safety systems.

Recommendations

1. To ensure that the facility's existing and proposed fire prevention, detection, protection and fire fighting measures are appropriate to the specific fire hazards and adequate to meet the extent of potential fires, a comprehensive fire safety study (FSS) is recommended to be undertaken.
2. That the FSS is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper No.2 (HIPAP No.2).
3. That the FSS is required to be approved by FRNSW.
4. That the development of the FSS considers the limited operational capability of local fire agencies and the need for the facility to achieve an adequate level of on-site fire and life safety independence.
5. To achieve a satisfactory level of fire safety, it is our recommendation that the FSS is developed in close consultation with FRNSW

For further information please contact the Infrastructure Liaison Unit, referencing FRNSW file number BFS18/2116. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Hawes', with a stylized flourish at the end.

A/Superintendent John Hawes
A/ Manager Fire Safety Branch
Community Safety Directorate