

**Phil Jones**

---

**Subject:** Sydney Business Park - Stage 3 SSD Risk

---

**From:** Renton Parker <[renton.parker@riskcon-eng.com](mailto:renton.parker@riskcon-eng.com)>  
**Sent:** Monday, 19 October 2020 12:39 PM  
**To:** Owen Walsh <[owen.walsh@sydneybusinesspark.com.au](mailto:owen.walsh@sydneybusinesspark.com.au)>  
**Subject:** RE: Sydney Business Park - Stage 3 SSD Risk

Hi Owen,

DPIE Comments:

*The individual lots are each subject to SEPP 33 if storing materials classified as Dangerous Goods (DGs) and as such, each site has its own assessable transport limit based upon the product to be stored. Each of the warehouses have been subject to a transport assessment (Sections 3,2,3, 3.3.3, 3.4.3, and 3.5.3) which assesses the likely transport movements based upon product stored. The conclusion in each section is that for the transport limits to be exceeded for each individual warehouses the turnover within the warehouse would be impractically high (i.e. product is being shipped to and from the warehouse with negligible storage time) which is not how warehouses typically work. Therefore, the transport movements for each individual warehouse would be below the SEPP 33 limits and thus transport limits would not be exceeded.*

*Aerosols are classified as Class 2.1 – Flammable Gases and hand sanitiser is classified as Class 3 – flammable liquids. From the perspective of SEPP 33 which does not review individual quantities the detail of the products, outside of them being flammable gases or liquids is essentially irrelevant. The only deviation for this would be for aerosol products which the assessment is based upon the percentage of propellant in the product rather than the total weight of the product. Furthermore, the designation of pallets isn't particularly relevant as it doesn't provide details around how full those pallets are. It is not uncommon for a pallet to only contain 50% of a full pallet load which still takes up one pallet space despite having less than the full storage capacity.*

*It has been assumed that the ethanol products are 100% ethanol and does not take into account a modification factor (i.e. as occurs with aerosols). Furthermore, SEPP 33 doesn't take into account the use of a product only the class, quantity, and location of the product. Therefore, how the ethanol is actually used at the site is irrelevant for the purposes of the SEPP 33 assessment.*

Endeavour Energy Comments

*The warehouses have been assessed to store DGs at quantities less than the State Environmental Planning Policy No. 33 (SEPP 33) therefore SEPP 33 isn't exceed and therefore a Preliminary Hazard Analysis (PHA) is not required to be prepared as part of the submission. A review of each warehouse storage indicates a separation distance to a site boundary is required to ensure SEPP 33 isn't exceeded for flammable liquids. The separation distance for Warehouse 3 to the site boundary to maintain below SEPP 33 is 5 m to the site boundary. A review of the location of the pad mounted transformer indicates it is approximately 7 m from the warehouse and thus would not be impacted by a fire arising within the warehouse based upon the SEPP 33 tables which are based upon radiant heat impact. It is considered that the presence of DGs in either Warehouse 3 would be insufficient to result in an impact to the infrastructure and thus no additional safeguards or assessment would be required.*

*With respect to the generators and the diesel refuelling area, these locations are further from the warehouse 3 than the pad mounted transformers and thus are impacted by less of a risk than the pad mounted substations which are further than the 5 m minimum separation distance as discussed above. Subsequently, it is considered the risks to the infrastructure are minimal and no further assessment is required.*

Regards,  
Renton

**Renton Parker**  
Director

+61 438 749 181  
[Renton.parker@riskcon-eng.com](mailto:Renton.parker@riskcon-eng.com)  
[www.riskcon-eng.com](http://www.riskcon-eng.com)

**Riskcon**  
engineering