From: Lynden Moyes
To: Shaun Williams
Cc: Fire Safety
Subject: BFS21/2052 - Major Projects – New Request for Advice - MOD 6 - Ammonia Storage Improvement (MP08_0129-Mod-6) (Newcastle City)
Date: Monday, 28 June 2021 1:06:06 PM

Dear Shaun,

RE: BFS21/2052

Request for advice
MP08_0129-Mod-6 Ammonia Storage Improvement Project – Orica Kooragang Island

Thank you for your submission of the scoping report for the above development to Fire and Rescue NSW (FRNSW) for agency review and comment.

It is understood that the modification application will be lodged under Section 4.55 2) of the EP&A Act (other modification). The purpose of the scoping report is to seek the Secretary's environmental assessment requirements (SEARs) from the Secretary of the NSW Department of Planning, Industry and Environment (DPIE) for an environmental assessment (EA) to accompany the application to modify the development consent.

FRNSW submit that the Orica Kooragang Island site, being a large chemical production facility, already presents unique hazards and risks to our personnel when fulfilling their emergency duties. It is highlighted that the Fire and Rescue NSW Act 1989 (the Act) imposes specific statutory functions and duties upon the Commissioner of FRNSW. Part 1, Section 5A of the Act requires the Commissioner to take all practicable measures for preventing and extinguishing fires and protecting and saving life and property within a FRNSW fire district. Part 1, Section 5A of the Act also requires the Commissioner to protect and save life and property endangered by hazmat incidents and for confining a hazmat incident and for rendering the hazmat site safe.

The following comments and recommendations are provided following a review of relevant parts of the scoping report.

- The proposed modification and addition of a new 30,000t ammonia tank would increase the ammonia storage of the facility in excess of 400%. It is recommended that a Preliminary Hazard Analysis (PHA) be undertaken to ensure the proposed development satisfies criteria provided within Hazardous Industry Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning. Whilst the PHA is generally intended to assess and determine the permissibility of development, it serves to inform FRNSW of potential hazards and risks associated with a site. Should an approval be granted, it is recommended that the PHA be progressed to a Final Hazard Analysis (FHA) once the design of the development has been finalised.
- It is noted that the applicant considers the proposed modification to be “substantially the same” as the existing development. While it is acknowledged that the proposed modification is not a new process or an addition of different chemical storage, it is a significantly large increase in storage and the modification should be properly considered for the quantitative difference from the existing development.
- Due to the large explosive risk posed by other chemicals stored at the Orica Kooragang Island site, it is recommended that any risk analysis conducted in the environmental assessment should consider the potential off site risks of a loss of containment of the entire contents of a storage vessel of the proposed size storing ammonia. The risk analysis should examine all potential on site and off site risks including life risk, economic risk, societal risk, environmental risk etc.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS21/2502. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards,

Lynden

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