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Contact: Senior Firefighter Lachlan Haar

28 March 2022

Jeffrey Peng
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Jeffrey Peng,

Re: Advice on Response to Submissions (RTS) -Terminals Bulk Liquids Storage Expansion - MOD 4 - Second Thermal Oxidiser (DA246/96-Mod-4)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 21 March 2022, requesting advice on the RTS for Terminals Bulk Liquids Storage Expansion - MOD 4 - Second Thermal Oxidiser (DA246/96-Mod). FRNSW have reviewed the RTS along with the Quantem Combustor Preliminary Hazard Analysis (PHA) Letter and note the submission of Site A Fire Safety Study (FSS).

FRNSW make the following comments regarding the proponent's response to FRNSW agency advice on the proposed modification:

1. FRNSW note the proponent's response that an existing Fire Safety Study (FSS) has been updated and certified in accordance with Hazardous Industry Planning Advisory Paper (HIPAP) No.2 and that the updated FSS incorporates the entire site. FRNSW are aware that this proposal is a modification to an existing terminal and the existing FSS has been updated to include the second thermal oxidiser.
2. FRNSW note a new full site PHA has not been undertaken; rather a PHA for the second combustor only. The proponent has stated that due to the proposed second combustor being located in a separated area away from the main storage, and risk analysis having been undertaken specific to the second combustor showing acceptably low propagation risk, that a full site PHA was not necessary.
3. FRNSW note the Emergency Response Plan (ERP) and the Emergency Services Information Package (ESIP) are proposed to be updated as part of the project during the detailed design phase and prior to the operations phase of the new combustor.

It has been the experience of FRNSW that bulk liquid storage facilities pose special problems of firefighting and special hazards exist that may require additional fire safety and management measures. Due to these unique challenges FRNSW make the following recommendations:

1. That the updated comprehensive FSS developed in accordance with the requirements of HIPAP No.2 be submitted to FRNSW for agency review and determination as to whether it meets the operational requirements of FRNSW.
2. That the FSS be developed to satisfy the operational requirements of FRNSW as a condition of consent.
3. That the full site PHA be submitted for review along with the second combustor PHA.
4. That the updated ERP be developed in accordance with HIPAP No.1.
5. That the updated ESIP be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.¹

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS22/1092. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



Superintendent John Hawes
Manager
Operational Liaison and Special Hazards Unit

Cc: jeffrey.peng@planning.nsw.gov.au

¹ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_ESIP_and_TFP.pdf