

From: Brendan.M Hurley
Sent: Tuesday, 24 March 2020 11:19 AM
To: Bianca Thornton
Cc: Fire Safety; John Hawes
Subject: Request for input to SEARs - Chullora Materials Recovery Facility (SSD-10443). BFS20/825

**Chullora Materials Recovery Facility (SSD-10443)
21 Muir Road Chullora, (Lot 2 Deposited Plan (DP) 1227526)**

Dear Bianca,

Thank you for your submission for the above development to Fire + Rescue NSW (FRNSW) for review and comment.

It is understood that SUEZ Recycling & Recovery Pty Ltd (the proponent) is proposing to develop and operate the second phase of the Chullora RRP as a Resource Processing Facility (RPF) (the Proposal) to process waste including household furniture, timbers and textiles, to recover recyclables, remove any contaminants and produce alternative fuel (Processed Engineered Fuel (PEF)); with a material processing capacity of up to 250,000 tonnes per annum (tpa).

It has been the experience of FRNSW that waste recycling facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

FRNSW submit the following general comments and recommendations for consideration:

- It is understood that a SEPP 33 assessment will be undertaken as part of the development of the Environmental Impact Statement (EIS).
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Fire safety in waste facilities* be addressed. Advice and recommendations contained within the guideline have been developed to enable FRNSW to adequately manage an incident at such facilities.
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Emergency Vehicle Access* be addressed. This is required such that FRNSW are able to safely access all parts of the site where an incident may occur.
- It is recommended that provisions be made for the containment of contaminated fire water run-off based on the worst credible fire scenario for the site. Any system(s) provided is to be automatic in nature and should not rely upon on-site staff or emergency services personnel to access or activate provided systems or valves in the event of fire.
- It is recommended that if the development proposes to incorporate a fire engineered solution (FES), whether a building design having a performance solution in accordance with the *National Construction Code (NCC)* or other infrastructure where building codes are not applicable, FRNSW should be engaged in the fire engineering brief (FEB) consultation process at the preliminary design phase, post approval of the development application. FRNSW also recommend that clauses E1.10 and E2.3 be addressed where a FES is required.
- It is recommended that a Condition of Consent be included that would require the fire and life safety measures for the development to be reassessed for adequacy in the event that either; significant changes are made to the site configuration, processing capacity is increased from 250,000 tpa, or there are changes to either the accepted waste streams or a significant increase in streams that are combustibile in nature.
- It is recommended that the an emergency plan for the waste facility in accordance with *AS 3745–2010 Planning for emergencies in facilities* be prepared for the development. An external consultant should be

engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/825. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards
Brendan



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