

**From:** [REDACTED]  
**To:** [Rebecka Groth](#)  
**Cc:** [REDACTED]  
**Subject:** RE: Notice of Exhibition – Jalco Manufacturing Facility (SSD-21190804)  
**Date:** Thursday, 16 December 2021 12:57:48 PM

---

Hi Rebecka,

Thanks for referring this to us.

The following reports on this SSD were reviewed:

- [EIS] SSD-21190804, Jalco Manufacturing Facility, Environmental Impact Statement (dated 8 November 2021, prepared by Urbis);
- [PHA – EIS Appendix M] Preliminary Hazard Analysis, 8 Johnston Crescent, Horsley Park, Jalco Australia Pty Limited (revision 1, dated 23 September 2021, prepared by Riskcon Engineering);
- [DG report – EIS Appendix J] Dangerous Goods Design Report, 8 Johnston Crescent, Horsley Park, Jalco Group Pty Ltd (revision 3, dated 9 September 2021, prepared by Riskcon Engineering); and
- [EIS Appendix K] Fire Safety Strategy, Jalco Tenancy Fitout, 8 Johnston Crescent, Horsley Park (revision 1, dated 30 August 2021, prepared by Affinity Fire Engineering).

The SSD exceeds the DG storage thresholds in the Department's *Applying SEPP 33*, making the SSD potentially hazardous and requiring a PHA to be submitted. The DG report supplementing the PHA describes how certain aspects of the SSD design can comply with the relevant Australian Standards. As a whole, the PHA and the DG report demonstrated that the SSD can be designed to comply with the risk criteria through implementing the relevant Australian Standards. However, as some design aspects could change after consulting with Fire and Rescue NSW on specific fire safety designs, we recommend a post-approval Final Hazard Analysis to confirm that the final design can remain compliant with the relevant Australian Standards.

Having reviewed the above reports, it is considered that the PHA has been prepared in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'*, demonstrating that the SSD would be able to comply with the Department's *Hazardous Industry Planning Advisory Paper No. 4, 'Risk Criteria for Land Use Safety Planning'*.

Given the above, we recommend the following conditions be included in the consent if the SSD is approved, ensuring that risks from this SSD will be appropriately managed throughout its life:

#### **LIMIT OF CONSENT**

1. The storage of dangerous goods (DG) and combustible liquids within the development must not exceed *Table 3-1* of the *Preliminary Hazard Analysis* dated 23 September 2021 (PHA).
2. The Applicant must store and handle all chemicals, fuels and oils in accordance with:
  - a. the requirements of all relevant Australian Standards; and
  - b. the NSW EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Handbook* if the chemicals are liquids.In the event of an inconsistency between the requirements in (a) and (b), the most

stringent requirement shall prevail to the extent of the inconsistency.

## HAZARDS AND RISK

### Pre-construction

3. The Applicant must prepare the studies set out under subsections (a) and (b) (the pre-construction studies). Construction, other than of preliminary works that are outside the scope of the hazard studies, must not commence until study recommendations have been considered and, where appropriate, acted upon. The Applicant must submit the studies to the Planning Secretary no later than one month prior to the commencement of construction of the development (other than preliminary works), or within such further period as the Planning Secretary may agree.

- a. FIRE SAFETY STUDY

A Fire Safety Study for the development. This study must cover the relevant aspects of the Department's *Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study'* and the New South Wales Government's *Best Practice Guidelines for Contaminated Water Retention and Treatment Systems*. The must be prepared in consultation with Fire and Rescue NSW, taking into consideration the *Fire Safety Strategy* dated 30 August 2021.

- b. FINAL HAZARD ANALYSIS

A Final Hazard Analysis of the development, consistent with the Department's *Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'*.

### Pre-commissioning

4. Prior to commissioning, the Applicant must develop and implement the plans and systems set in (a) and (b). The Applicant must submit to the Planning Secretary documentation describing the plans and systems no later than two months prior to the commencement of commissioning of the proposed development, or within such further period as the Planning Secretary may agree.

- a. EMERGENCY PLAN

A comprehensive Emergency Plan and detailed emergency procedures for the development. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'*.

- b. SAFETY MANAGEMENT SYSTEM

A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document must clearly specify all safety related procedures, responsibilities and policies along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be developed in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'*.

**Ongoing****5. HAZARD AUDIT**

Twelve months after the commencement of operations of the development and every five years thereafter, the Applicant must carry out a comprehensive Hazard Audit of the development and within one month of each audit submit a report to the satisfaction of the Planning Secretary. The audits must be carried out at the Applicant's expense by a qualified person or team, independent of the development and approved by the Planning Secretary prior to commencement of the audit. Hazard Audits must be carried out in accordance with the Department's *Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit'*. The audit must include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.

**6. FURTHER REQUIREMENTS**

The Applicant must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 3 to 5, within such time as the Planning Secretary may agree.

Please forward any Hazards-related submissions, especially from FRNSW, and we can review and modify the conditions, if necessary.

Thanks.

Regards,

**Nicholas Hon**

Technical Specialist (Hazards)

Industry Assessments

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150



**Planning,  
Industry &  
Environment**

---