

From: [John Marks](#)
To: [Rebecka Groth](#)
Cc: [Doris Yau](#)
Subject: 3683 HAZARDS Review EIS, ARDEX Warehouse and Manufacturing Facility (SSD-25725029)
Date: Monday, 13 December 2021 2:06:50 PM

Dear Rebecka,

Thanks for forwarding the Environmental Impact Statement (EIS) for the ARDEX Warehouse and Manufacturing Facility (SSD-25725029). The proposed development is for the construction, internal fit out and operation of a manufacturing facility and warehouse. The facility is proposed to comprise manufacturing areas, warehousing, offices, powder silo and liquid tank storage. The proposal will have a capacity of 48,000 tonnes of powder products and 25,000 kilolitres of liquid products. Dangerous goods will be handled and stored at the proposed development.

Documents Reviewed

The following documents were reviewed.

1. Environmental Impact Statement, Proposed Manufacturing Facility and Associated Warehouse, Willowtree Planning, Version No.7, 09 November 2021;
2. State Environmental Planning Policy No. 33, 657-769 Mamre Road, Kemps Creek, Riskcon Engineering, Revision 1, 21 September 2021; and
3. Letter, Affinity Fire Engineering to Paul Solomon, RE DA Support, Ardex Facility, 657-769 Mamre Road, Kemps Creek, 08 November 2021.

Following a review of the EIS the following comments are made and we request further information from the Applicant.

1. The State Environmental Planning Policy No. 33 Report (SEPP 33 Report) presents the quantities of Dangerous Goods (DGs) in Table 3-1 and undertakes a preliminary risk screening in section 3.3. We make the following comments on the preliminary risk screening.
 - a. The Department highlights that there were inconsistencies in separation distances used for preliminary risk screening of flammable liquids in the SEPP 33 Report. On page 6 of the SEPP 33 Report, describes 9 metres separation for risk screening of flammables. In Figure 3-1 of the SEPP 33 Report, the smallest distance is 12 metres to site boundary and in Figure 3-4, 16 meters separation is applied for preliminary risk screening. As such the Department is unclear on validity of the preliminary risk screening of flammable liquids given the smallest separation from the warehouse to the site boundary is 12 metres.;
 - b. From Table 3-1 of the SEPP 33 Report the DG Class 8 are listed as two (2) packing groups. Packing Group II (13,302kg) and Packing Group III (21,297kg). As per "*Applying SEPP33*", page 16, where a DG class of differing packing groups are "kept on site in the same general location" then the most hazardous packing group is applied to total class storage. As such the DG Class 8 material should be totalised as Packing group II (34,599 kg) and would exceed the threshold quantities in "*Applying SEPP 33*"; and
 - c. The Department seeks clarification on whether any of the Class 9 or other hazardous materials are defined as a combustible liquid C1 (as classified by

AS 1940) and stored at the proposed development. We request the Applicant provide any quantity of combustible liquid C1 to be stored at the proposed development. As per “*Applying SEPP33*”, page 16, where combustible liquids C1 are kept within a store with flammable liquids they are treated as DG Class 3 PGIII and must be added to the flammable liquids’ quantity when undertaking the preliminary risk screening.

Given the above, the Applicant has not demonstrated that the quantities of DGs to be stored at the proposed development are below the threshold screening quantities in “*Applying SEPP 33*”. As such, the Applicant must undertake a preliminary risk screening in accordance with *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011)*, given points (a) to (c) above. The Applicant, as per the SEARs, should provide a layout, clearly indicating the location of the dangerous goods to be stored for the proposed development.

Should the risk screening indicate that the proposed development is “potentially hazardous” a Preliminary Hazard Analysis (PHA) must be prepared in accordance with *Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011)* and *Multi-Level Risk Assessment (DoP, 2011)*.

2. The proposed development will incorporate an office space. The Department highlights that these offices would be classified as an on-site protected place by Australian Standards for the handling of DGs. The Department seeks information on separation of the warehousing areas (containing DGs) to the offices, noting the requirements of Australian Standards for storage and handling DGs.

Furthermore, in section 3.2.12 of the EIS, future batching and packaging of flammable liquids is described. As such, the Department seeks information regarding the application of AS 1940 Appendix L regarding separation of the liquid processing area to the offices (on-site protected place) and other areas.

If you have any further queries do not hesitate to contact me

Regards

John Marks
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