



State Environmental Planning Policy No. 33

600 Woodstock Avenue, Glendenning

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600 Woodstock Avenue, Glendenning

Cleanaway Pty Ltd

Prepared by

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Quality Management

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Executive Summary

Background

Cleanaway Pty Ltd (Cleanaway) has proposed to develop a new facility to process recyclable wastes including glass, plastic and cardboard at 600 Woodstock Avenue, Glendenning. Secretary Environmental Assessment Guidelines (SEARs) have been issued for the development which requires the preparation of a State Environmental Planning Policy No. 33 (SEPP 33) to assess the hazards and risks associated with the development.

Charter Hall, on behalf of Cleanaway, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 600 Woodstock Avenue, Glendenning.

Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project. Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

As the facility is not classified as potentially hazardous or offensive, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

Provided in **Table E-1** is a summary of the SEARs issued for the development the location they have been addressed within this report.

Table E-1: SEARs Table

| ID | Requirement | Location Addressed within Report |
|-----------------|---|---|
| Hazards & Risks | <ul style="list-style-type: none"> a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development | This report |
| | <ul style="list-style-type: none"> Should preliminary screening indicate that the 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) | SEPP 33 was not exceeded; hence, a Preliminary Hazard Analysis is not required. |

Recommendations

No recommendations have been made as a result of the assessment.

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Abbreviations

| Abbreviation | Description |
|--------------|--|
| ADG | Australian Dangerous Goods Code |
| DA | Development Application |
| DGs | Dangerous Goods |
| DPE | Department of Planning and Environment |
| SEPP | State Environmental Planning Policy |

1.0 Introduction

1.1 Background

Cleanaway Pty Ltd (Cleanaway) has proposed to develop a new facility to process recyclable wastes including glass, plastic and cardboard at 600 Woodstock Avenue, Glendenning. Secretary Environmental Assessment Guidelines (SEARs) have been issued for the development which requires the preparation of a State Environmental Planning Policy No. 33 (SEPP 33) to assess the hazards and risks associated with the development.

Charter Hall, on behalf of Cleanaway, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to prepare a SEPP 33 assessment for the facility to determine whether the risk profile is acceptable for the location. This document represents the SEPP 33 assessment for the site at 600 Woodstock Avenue, Glendenning.

1.2 Scope of Services

The scope of work is to prepare a SEPP 33 assessment for the facility located at 600 Woodstock Avenue, Glendenning. The assessment does not include any other sites or the preparation of any additional planning studies should they be required.

2.0 Methodology

2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs the threshold quantities listed in “Applying SEPP 33 – Hazardous and Offensive Development” (Ref. [1]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33 (Ref. [1]).
- Report on the findings of the SEPP 33 assessment.

2.2 Data taken from “Applying SEPP 33”

Figure 2-1, extracted from “Applying SEPP 33” provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold (Ref. [1]).

| Class | Method to Use/Minimum Quantity |
|--|--|
| 1.1 | Use graph at Figure 5 if greater than 100 kg |
| 1.2-1.3 | Table 3 |
| 2.1 — pressurised (excluding LPG) | Figure 6 graph if greater than 100 kg |
| 2.1 — liquefied (pressure) (excluding LPG) | Figure 7 graph if greater than 500 kg |
| LPG (above ground) | table 3 |
| LPG (underground) | table 3 |
| 2.3 | table 3 |
| 3PGI | Figure 8 graph if greater than 2 tonne |
| 3PGII | Figure 9 graph if greater than 5 tonne |
| 3PGIII | Figure 9 graph if greater than 5 tonne |
| 4 | table 3 |
| 5 | table 3 |
| 6 | table 3 |
| 7 | table 3 |
| 8 | table 3 |

Figure 2-1: Screening Method to be Used

Table 3 from “Applying SEPP 33” has been extracted and is shown in **Figure 2-2**.

| Class | Screening Threshold | Description |
|-------|--|---|
| 1.2 | 5 tonne | or are located within 100 m of a residential area |
| 1.3 | 10 tonne | or are located within 100 m of a residential area |
| 2.1 | (LPG only — not including automotive retail outlets ¹) | |
| | 10 tonne or 16 m ³ | if stored above ground |
| | 40 tonne or 64 m ³ | if stored underground or mounded |
| 2.3 | 5 tonne | anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale |
| | 1 tonne | chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg |
| | 2.5 tonne | chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg |
| | 100 kg | liquefied gas kept in or on premises |
| | 100 kg | other poisonous gases |
| 4.1 | 5 tonne | |
| 4.2 | 1 tonne | |
| 4.3 | 1 tonne | |
| 5.1 | 25 tonne | ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary |
| | 5 tonne | ammonium nitrate — elsewhere |
| | 2.5 tonne | dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg |
| | 1 tonne | dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg |
| | 5 tonne | any other class 5.1 |
| 5.2 | 10 tonne | |
| 6.1 | 0.5 tonne | packing group I |
| | 2.5 tonne | packing groups II and III |
| 6.2 | 0.5 tonne | includes clinical waste |
| 7 | all | should demonstrate compliance with Australian codes |
| 8 | 5 tonne | packing group I |
| | 25 tonne | packing group II |
| | 50 tonne | packing group III |

Figure 2-2: General Screening Threshold Quantities

Transportation screen thresholds have been provided in **Figure 2-3**.

| Class | Vehicle Movements | | Minimum quantity* | |
|--------|-------------------|-----------|-------------------|----------|
| | Cumulative | Peak | per load (tonne) | |
| | Annual | or Weekly | Bulk | Packages |
| 1 | see note | see note | see note | |
| 2.1 | >500 | >30 | 2 | 5 |
| 2.3 | >100 | >6 | 1 | 2 |
| 3PGI | >500 | >30 | 1 | 1 |
| 3PGII | >750 | >45 | 3 | 10 |
| 3PGIII | >1000 | >60 | 10 | no limit |
| 4.1 | >200 | >12 | 1 | 2 |
| 4.2 | >100 | >3 | 2 | 5 |
| 4.3 | >200 | >12 | 5 | 10 |
| 5 | >500 | >30 | 2 | 5 |
| 6.1 | all | all | 1 | 3 |
| 6.2 | see note | see note | see note | |
| 7 | see note | see note | see note | |
| 8 | >500 | >30 | 2 | 5 |
| 9 | >1000 | >60 | no limit | |

Figure 2-3: Transportation Screening Thresholds

3.0 Project Description

3.1 Site Location and Layout

The proposed warehouse is located at 600 Woodstock Avenue, Glendenning which is approximately 42 km west of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to the Sydney CBD.

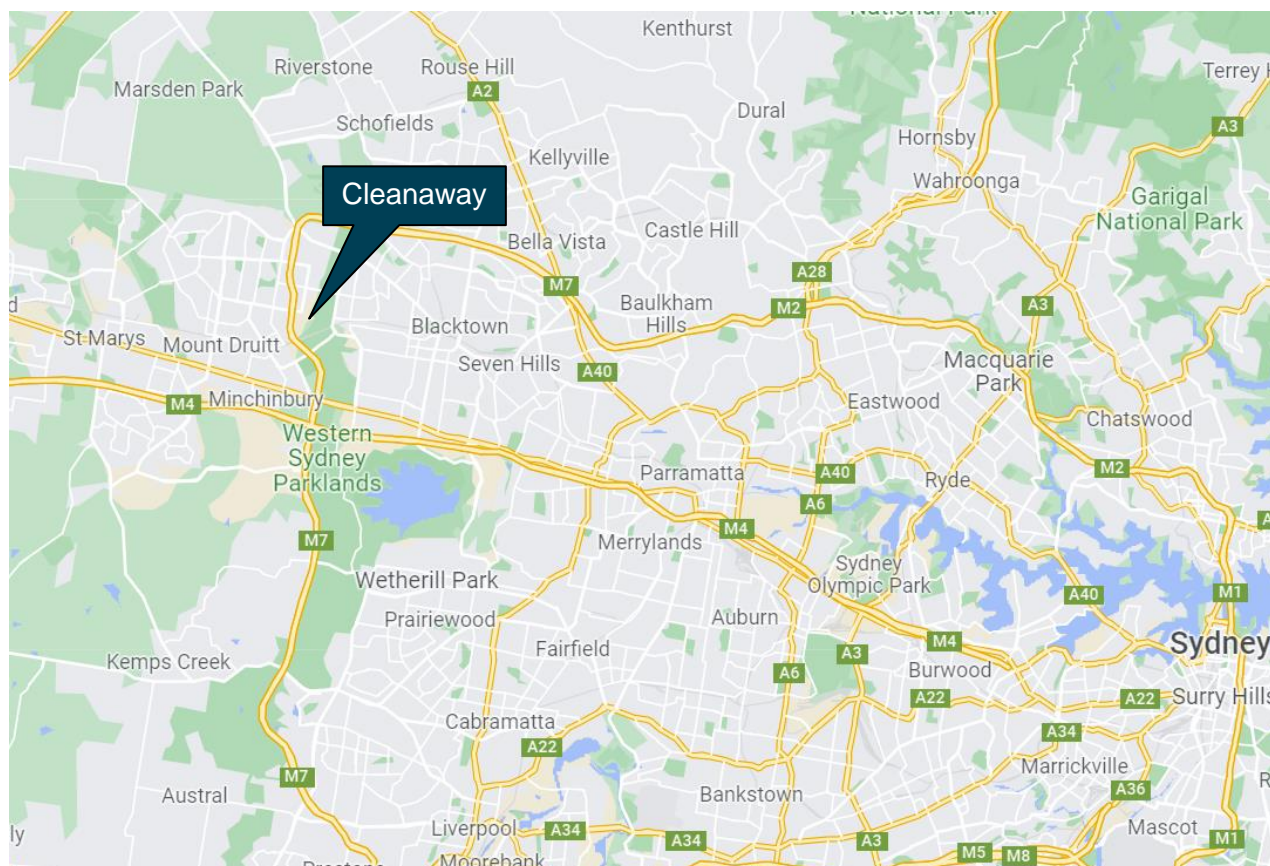


Figure 3-1: Site Location (source Google Maps)

3.2 Project Overview

Cleanaway seeks to design, construct, install and commission a state significant infrastructure-Material Recovery Facility (MRF) plant in a brand new purposed built building and office space. The delivery of the plant is to ensure Cleanaway meet sits commitment to Blacktown City Council for a facility to be online by early 2023. The material to be processed at the MRF will include, paper, cardboard, glass, aluminium, plastics, steel etc. The scope includes (but is not limited to):

- A materials recovery facility with the latest Materials Recovery technology and building a new plant that has the capacity of sorting 120, 000 TPA.
- The MRF will be designed for yellow lidded bins, Container Deposit scheme (CDS). Comingle Materials to be processed to include paper, cardboard, glass, aluminium, plastic, steel etc
- Development of concept designs for the MRF plant, ancillary office, minimum 2 x weigh bridges, truck parking, visitor sand staff car parking.

- The MRF will be designed with the capability of 24/7 operation with also CCTV system, thermal scanners, MDB, MCC, Air room and SCADA control plant.
- The facility will be design and constructed according to Australian Standards (National Codes, Building codes, Compliance with NSW Fire Rescue guidelines and EPA waste facility environmental management guidelines for waste facilities.
- Construction or redevelopment of an old industrial standalone site within the Blacktown local government area (Western Sydney Area).
- Initially the MRF will ramp up to service the (Western Sydney Area) Blacktown Council Recyclables Materials-Yellow lidded bins–Recycling Bins collected from Municipal Council recyclables with the capacity to service additional contracts within the Greater Sydney region. Ultimately, adding to NSW remanufacturing/ recycling overall capacity.
- This plant will be designed to also able to accommodate additional cardboard and recyclables materials from our Commercial and Industrial Customers as well.

3.3 Proposed Dangerous Goods Storage

Table 3-1 provides a summary of the Dangerous Goods (DGs) which will be stored and handled within the facility.

Table 3-1: Proposed DGs Stored and Handled

| Class | Description | Packing Group | Quantity (kg) |
|-------|--|---------------|---------------|
| 2.1 | Liquefied Petroleum Gas (LPG) – Forklift cylinders | n/a | 540 |

4.0 SEPP 33 Review

4.1 Proposed Storage Details

The maximum quantities of products and DGs that are to be stored at the facility, are shown in **Table 4-1**. The data has been taken from existing site operations provided by the client. Provided in **Table 4-1** is an assessment of whether the Class is subject to SEPP 33.

Table 4-1: DG Classes or Materials Stored and Maximum Quantities

| Class | Description | PG | Quantity | Class Subject to SEPP 33 (Y/N) |
|-------|-------------------------|-----|----------|--------------------------------|
| 2.1 | Liquefied Petroleum Gas | n/a | 540 kg | Y |

4.2 Application of State Environmental Planning Policy No.33 – Hazardous and Offensive Developments

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) has been developed under the Planning and Assessment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning and Environment in the conditions of consent.

4.3 Assessment of Hazards

4.3.1 Storage

Threshold limits for the application of SEPP 33 are presented in **Table 4-2** along with maximum DG quantities that will be stored. The results summarised in the table indicates the SEPP 33 criteria is not exceeded; hence, no further assessment would be required.

Table 4-2: Quantities Stored and SEPP 33 Threshold

| Class | Description | PG | Quantity | SEPP Threshold (kg) | Does SEPP 33 (Y/N) |
|-------|-------------|-----|----------|---------------------|--------------------|
| 2.1 | LPG (U/G) | n/a | 540 kg | 10,000 | N |

4.3.2 Transport

The DGs stored and handled are for use at the facility and would not require high turnover; hence, the transport limits would not be exceeded and SEPP 33 would not apply to the transport of DGs at the site.

4.4 Assessment of Offense

SEPP 33 also contains a requirement for review of operations that may cause offense in the form of odour, environmental impact, nuisance (noise), etc. An indication of whether “offensiveness” may occur at the facility is whether an Environmental Protection Authority (EPA) licence is required for specific operations at the site. A review of the facilities operations indicates that there are no processes that would result in the manufacture, production, or transfer of materials in a form that may result in the release of bulk materials at the site or that could result in odour generation or excessive noise. An EPA licence would not be required for this site.

Further, there would be no unusual operations that would cause potential odours, or noise at the closest residential area which is approximately 300 m away on the other side of the M7 motorway. Therefore, it is considered that noise generated from the site operations would not exceed the background noise already exposed at residential areas.

In summary, there is no potential for “offensive” operations at the site and therefore SEPP 33 does not apply in this case.

5.0 Conclusion and Recommendations

5.1 Conclusions

A review of the quantities of DGs stored at the proposed facility and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project. Furthermore, a review of the potential to cause offense was conducted which indicated the site operations would be unlikely to result in noise or odour to occur at levels which would cause offense.

As the facility is not classified as potentially hazardous or offensive, it is not necessary to prepare a Preliminary Hazard Analysis for the facility as SEPP 33 does not apply.

Provided in **Table 5-1** is a summary of the SEARs issued for the development the location they have been addressed within this report.

Table 5-1: SEARs Table

| ID | Requirement | Location Addressed within Report |
|-----------------|---|---|
| Hazards & Risks | <ul style="list-style-type: none">a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development | This report |
| | <ul style="list-style-type: none">Should preliminary screening indicate that the 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) | SEPP 33 was not exceeded; hence, a Preliminary Hazard Analysis is not required. |

5.2 Recommendations

No recommendations have been made as a result of the assessment.

6.0 References

- [1] Department of Planning, "Applying SEPP 33," Department of Planning, Sydney, 2011.
- [2] NSW Department of Planning and Environment, "Applying SEPP33 – Hazardous and Offensive Developments," NSW Department of Planning and Environment, Sydney, 2011.