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Contact: Station Officer Mark Castelli

18 November 2014

Attention: Pamela Morales
Dept. of Planning & Environment
GPO Box 39
SYDNEY NSW 2571

Email: Pamela.Morales@planning.nsw.gov.au

Dear Madam,

**SECTION 96(2) MODIFICATION APPLICATION (SSD-5544 MOD)
CALTEX KURNELL REFINERY
DEMOLITION AND REMOVAL OF REDUNDANT INFRASTRUCTURE**

I refer to your email submission dated 27 November 2014 in regards to the above application. Fire and Rescue NSW (FRNSW) note that we have been invited by the Department of Planning & Environment (DPE) to comment upon the above proposal (including advice on recommended conditions of consent).

The relevant details of the Statement of Environmental Effects (SEE) reviewed by FRNSW and accessed from the DPE website are:

- SEE prepared by Nicole Brewer, William Miles and Rachel O'Hara of URS Australia Pty Ltd ,
- SEE dated November 2014,
- SEE Declaration signed by William Miles, November 2014.
- SEE Appendix 'B', Hazard and Risk Analysis, prepared by Karin Nilsson of Planager (Document No. URS\26-B388, Revision 0).

FRNSW has reviewed the SEE and the following FRNSW comments have been derived from specific review of Appendix 'B' of the SEE, (i.e. Hazard and Risk Analysis).

Comment

The following comments form the basis of our recommendations to the DPE and are provided for informative purposes, (please note, FRNSW does not object to our comments being forwarded to the proponent for their information should the Department so wish).

The Fire Brigades Act 1989 assigns statutory responsibility for safe resolution of fire incidents and hazardous material incidents (hazmat) to the Commissioner of FRNSW. Therefore our review is primarily concerned with the hazard incident scenarios identified and discussed in Appendix 'B' of the SEE.

FRNSW considers that the following hazard scenarios (detailed in Table 3 of Section 4 of the Hazard & Risk Analysis) will require FRNSW involvement:

- Process Safety Related Hazards: Scenarios 1 to 5 inclusive.
- General Health & Safety Related Hazards: Scenario 13.
- Other Risk to the Biophysical Environment: Scenario 19.

Should a fire or hazardous material (hazmat) incident occur during the refinery demolition works, it is important that first responders have ready access to information which enables effective control measures to be quickly implemented. Information which should be readily available to first responders should include:

- The names of chemicals and heavy metals which may be involved in a fire/hazmat incident,
- The properties of each chemical and heavy metal (including when involved in a fire).
- The risk to health posed by identified chemicals (especially when involved in a fire).
- The appropriate control measures which must be implemented in order to safely mitigate potential risks. Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and the means to bund or confine contaminated water and fire water runoff.
- Unique control measures implemented which are specific to the demolition works.
- The location of any nearby public infrastructure which may be at risk from a significant fire and its contaminated smoke plume, (e.g. shipping corridors, flight paths, public road ways and public assembly areas).

Further, FRNSW notes that Scenario 5 (i.e. Introduction of Ignition Sources into Classified Hazardous Areas) is recognised as being potentially difficult to mitigate. Table 4 of the Hazard & Risk Analysis states: *"demolition contractors may not be well versed with the requirements for control of ignition sources at the site"*. The safeguard discussed in Table 4 recommends that *"hazard area classification be reviewed and updated, particularly in locations where demolition activities are to be undertaken in parallel with an operating terminal"*. FRNSW is concerned that the proposed safeguard is insufficient to satisfactorily minimise the likelihood of the identified hazard occurring. It is FRNSW experience that in instances where either insufficient safeguards/control measures are developed and implemented or where appropriate risk control measures are wilfully or unintentionally ignored significant fire events often occur, (see recommendation below).



Recommendation/s

That the Director General consider including conditions of development consent which require:

1. That appropriate emergency procedures are developed by the proponent to address and mitigate, as far as reasonably practicable, the consequences of fire and hazmat incidents and the potential health risks to firefighters undertaking emergency operations in relation to foreseeable fire/hazmat scenarios.
2. That two copies of the emergency plan (detailed in recommendation 1 above) be stored in each 'Emergency Information Cabinet/s'. Emergency Information Cabinet/s' are to be located in positions directly adjacent to each entry point which provide vehicle access into the demolition zone.
3. That appropriate first aid fire fighting equipment be provided to all plant during the demolition works. In addition, that all operators of plant and other equipment be trained to undertake first aid fire fighting operations using the equipment provided.
4. That comprehensive and specific risk control measures be developed and implemented for Scenario No. 5 of Table 3 of Section 4 of the Hazard & Risk Analysis, i.e. Appendix 'B' of the SEE, (i.e. Scenario No. 5 being the "Introduction of Ignition Sources into Classified Hazardous Areas"). The control measures developed must incorporate comprehensive training of demolition contractors in regards to the requirements for the control of ignition sources at the site.

Conclusion

The development of an effective emergency response plan, specifically developed for the demolition works, would be significantly enhanced by the site's operators engaging and liaising with FRNSW local command management. Such enhancement would be best facilitated by ensuring that FRNSW personnel were afforded the opportunity to undertake pre-incident planning of identified hazards and to familiarise themselves with the emergency procedures developed by the proponent. The relevant contact details of FRNSW local command management are:

Zone Office Metropolitan South 2
Cnr Kensington and Gray Streets
Kogarah NSW 2217
Telephone: 02 9588 2833
Business Hours: 8:00 am – 4:30 pm.



FRNSW thanks the DPE for the opportunity to comment upon the modification application. For further information please contact Station Officer Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS14/3402 (7185). Please ensure that all correspondence in relation to this matter is submitted electronically to bfs@fire.nsw.gov.au.

Yours sincerely



Station Officer Jon Black
Team Leader
Fire Safety Assessment Unit

