

Appendix 4

Fire and Hazard Preliminary Risk Assessment



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Fire and Hazard Preliminary Risk Assessment

Glenfield Materials Recycling Facility

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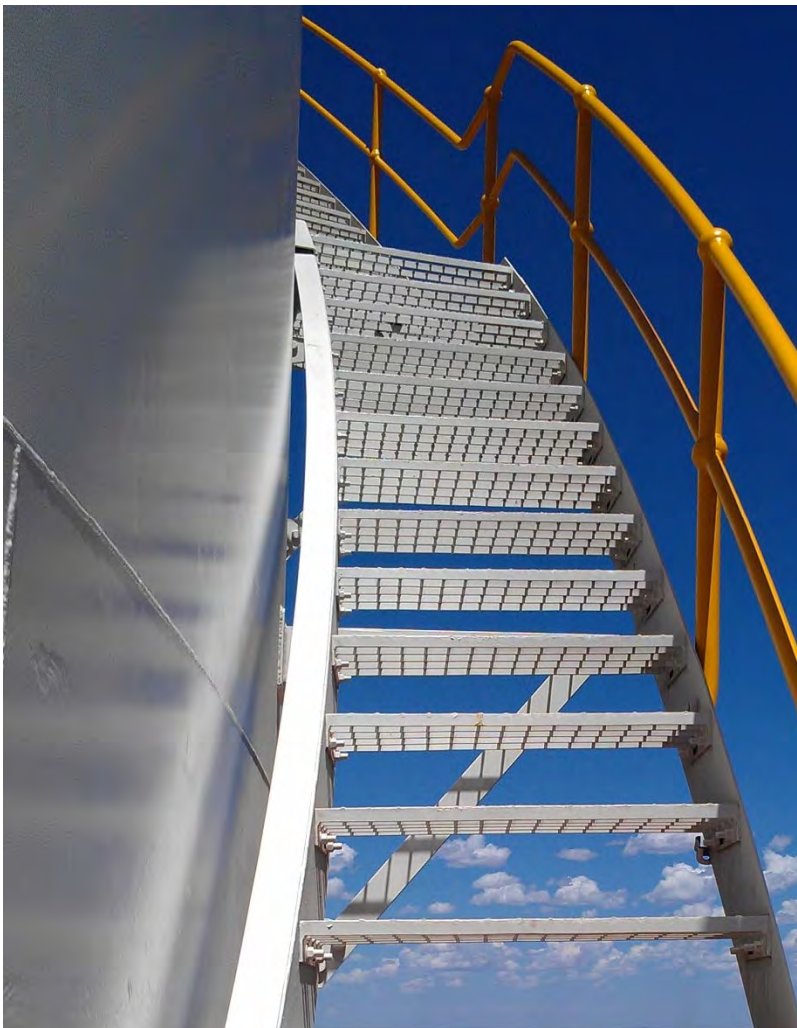
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Unless otherwise advised, the parties who have undertaken the Review and Endorsement confirm that the information contained in this document adequately describes the conditions of the Waste storage, handling and site located at Glenfield Waste Services.

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1 Executive Summary

ACOR MCE was asked to prepare a report for the proposed Glenfield Waste Services (GWS) Materials Recycling Facility to address these requirements by 'Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines'.

The proposed Materials Recycling Facility at Glenfield in the City of Campbelltown Local Government Area has been identified as a 'State Significant Development'. The Director-General Environmental Assessment Requirements (as per section 78A (8A) of the Environmental Planning and Assessment Act) requires;

- A Preliminary Hazard Analysis (PHA) of the development; and
- An assessment of the potential fire risks of the development.

The preliminary hazard analysis was conducted as per the guidelines in HIPAP No.6 – Hazard Analysis. After reviewing the materials stored and processed on the site it was found; the site does not have hazardous materials as defined in the Australian Dangerous Goods Code or NSW Planning – Storage and Handling of Dangerous Goods – Code of Practice 2005.

A list of the materials and products processed on site are summarised in Table 1 and Table 2. Some of the raw materials and products stored at this site have been classified as 'combustible material'.

A hazard identification and assessment of the potential fire risks of the development was completed and is presented in Table 3.

Based on the PHA and fire assessment; recommendations were developed to reduce the potential risk and improve safety at the facility.

1.1 Recommendations

The following recommendations were developed during the hazard identification and assessment of the potential fire risks of the development.

1. Develop a stockpile management plan for the facility.
2. Develop an Emergency Response Plan specific to the MRF.
3. Implement a hot work permit system.
4. Implement formal site 'close-down' procedures to inspect the site for smouldering fires.
5. GWS should consult with the local fire brigade before selecting and installing fire equipment to ensure compatibility.
6. Prepare and annually review a fire risk assessment.
7. GWS should provide an emergency tipping area for waste loads identified to be on fire or otherwise deemed to be an immediate risk.

2 Glossary and Abbreviations

Abbreviation	Definition
VENM	Virgin Excavated Natural Material
ENM	Excavated Natural Material
ACOR MCE	ACOR MCE Pty Ltd
AS	Australian Standard
AS /NZS	Australian/ New Zealand Standard
C&D	Construction and Demolition
C&I	Commercial and Industrial
DG	Dangerous Goods
SEPP	State Environmental Planning Policy
GWS	Glenfield Waste Services
ERP	Emergency Response Plan
NSW	New South Wales
MRF	Materials Recycling Facility
H ₂ S	Hydrogen sulphide
n/a	Not Applicable
PHA	Preliminary Hazard Analysis
PPE	Personal Protective Equipment

3 Introduction

The proposed Glenfield Waste Services (GWS) Materials Recycling Facility at Glenfield in the City of Campbelltown Local Government Area has been identified as a 'State Significant Development'. The Director-General Environmental Assessment Requirements (as per section 78A (8A) of the Environmental Planning and Assessment Act) require;

- A Preliminary Hazard Analysis (PHA) of the development; and
- An assessment of the potential fire risks of the development.

ACOR MCE was asked to prepare a report to address these requirements by 'Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines'.

3.1 Scope

GWS is proposing to develop a Materials Recycling Facility (MRF) within the southern portion of the Glenfield site on land owned by the GWS Group within the bounds of the current landfill site at Glenfield, NSW. The facility will have a capacity to process 450,000 tonnes of recycling per annum of non-putrescible waste, primarily C&I and C&D waste for reuse in secondary markets. The MRF will be located across approximately five (5) hectares in four differentiated but contiguous areas and positioned to avoid existing landfill cells. Site entry and egress for transport of material will utilise existing site access locations along Cambridge Avenue and Railway Parade respectively.

The scope of this report excludes existing landfill facility. The existing GWS operations are licensed as a non-putrescible landfill operation. Therefore, any material that cannot be recycled is forwarded directly to the GWS landfill operations and as such landfill operations do not form part of this report.

3.2 Methodology

SEPP 33 specifies that a PHA must be prepared in accordance with *Hazardous Industry Planning Advisory Paper (HIPAP) No. 6 – Hazard Analysis*. The potential fire risks of the development must be prepared using the *Hazardous Industry Planning Advisory Paper (HIPAP) No.2. – Fire Safety Study Guidelines*.

The purpose of this report is to address both the PHA and potential fire risks of the development implementing the following process;

1. Identification of the hazardous incidents with the proposal;
2. Analyse the consequences of the hazardous incidents previously identified and examine in terms of consequences for operating personnel, neighbours, and their likelihood of occurrence;
3. Identification of existing controls and protection measures;
4. Analysis of existing controls against requirements and industry best practice; and
5. Development of recommendations for additional safety and compliance.

4 Description of Facilities

Glenfield Waste Services (GWS) is proposing to develop a Materials Recycling Facility on land owned by the GWS Group within the bounds of the current landfill site at Glenfield, NSW. The facility is proposed to recycle a maximum of 450,000 tonnes of material per year.

Comprising an area of approximately 100 hectares, the GWS site has been operated by L.A Kennett Enterprises Pty Ltd as a non-putrescible landfill and resource recovery centre for in excess of 30 years. Straddling two local Government areas, consent for the site's use as a waste depot was obtained from Campbelltown Council in June 1979 and from Liverpool Council in January 1991.

GWS propose to intensify current recycling operations and to relocate recycling activities to unfilled (virgin) land in order to facilitate effective environmental licensing. It is proposed that onsite recycling will be primarily sourced from commercial and industrial (C&I) and construction and demolition (C&D) waste. The C&I waste will be limited to natural and manufactured timbers, green waste, metals, plastics (hard and soft) and glass. The C&D waste will predominantly consist of concrete, brick, asphalt, terracotta etc. as well as virgin excavated natural material (VENM) and excavated natural material (ENM).

The existing GWS operations are licensed as a non-putrescible landfill operation. Therefore, any material that cannot be recycled is forwarded directly to the GWS landfill operations and as such landfill operations do not form part of this SSD proposal.

4.1 Site Layout

The proposed MRF will be located within the existing GWS site. The following key features characterise the overall Glenfield waste site:

- The site is triangular in shape and covers a total area of approximately 100ha;
- The site is bounded to the east by the Georges River;
- The site is bounded to the west by the Southern Rail & South Sydney Freight Lines;
- The site is bounded to the south by an existing residential area;
- The site has a relatively flat topography with undulating slopes due to the current waste activities in the northern portion of the site; and
- The site directly fronts Cambridge Avenue to the south, which is the main entrance to the site.

Figure 1 shows the location of the overall GWS site.

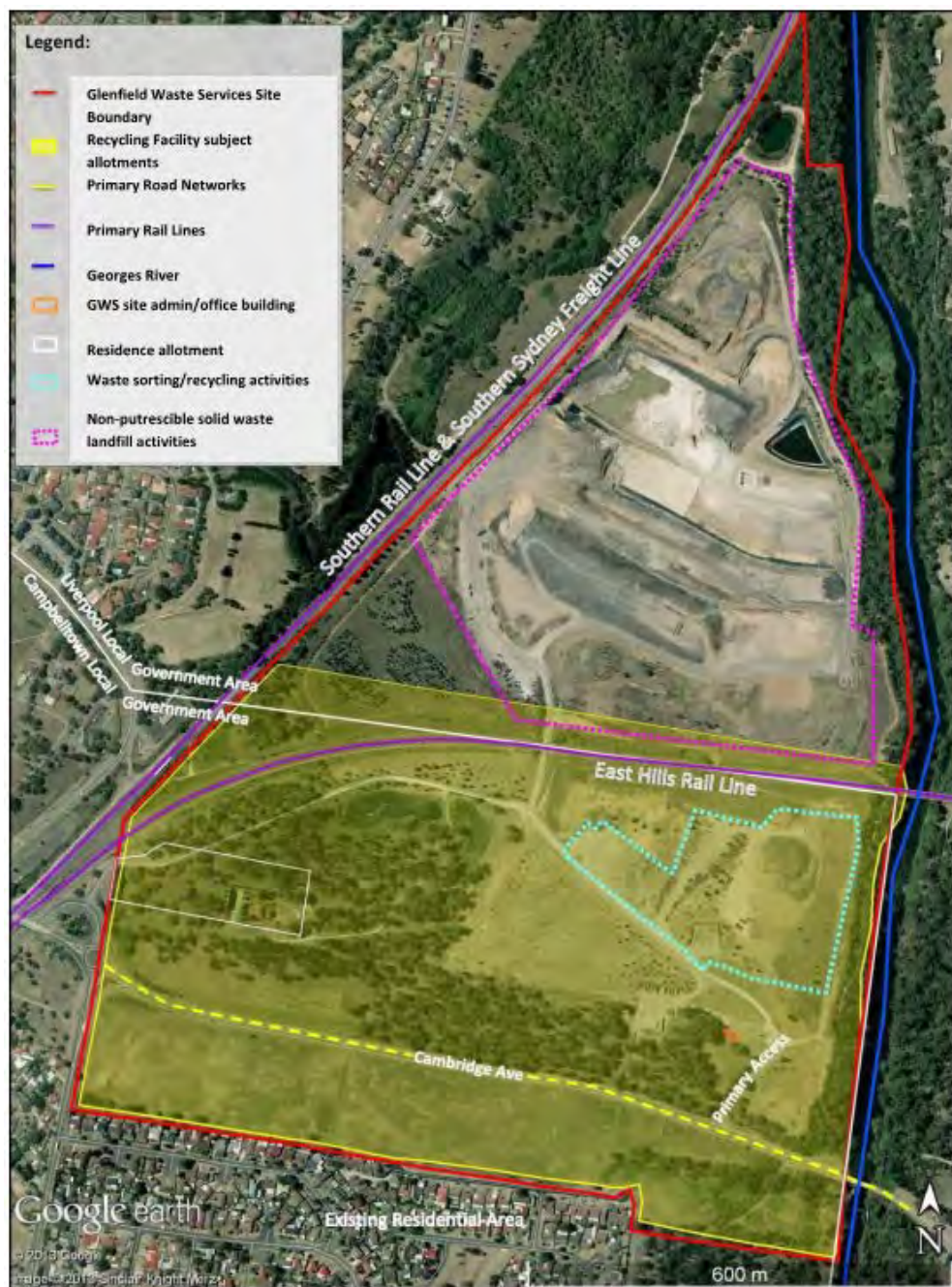


Figure 1 Overall GWS site overview

4.2 Site Location

The proposed facility is located within the boundaries of the existing GWS site at Cambridge Avenue, Glenfield. This land is currently zoned 1(a) – Rural A as per Campbelltown (Urban Area) Local Environmental Plan 2002. A planning proposal is in place to re-zone the land as IN1 General Industrial.

The MRF is proposed to be located within the southern portion of the GWS site, across the following parcels of land:

- Lot 1 DP 113201 (0.4148ha) Owner: JC & FW Kennett Pty Ltd

- Lot 2 DP 333578 (1.346ha) Owner: JC & FW Kennett Pty Ltd
- Lot 3 DP 736881 (25.31ha) Owner: Figela Pty Ltd
- Lot 91 DP 1155962 (29.49ha) Owner: JC & FW Kennett Pty Ltd

Figure 2 shows the location of the MRF within the boundary of the existing GWS site.



Figure 2 Location of proposed MRF within the GWS site

4.3 Surrounding Land Use

The portion of the GWS site north of the East Hills Rail Line consists of sand and sandstone extraction activities and a non-putrescible solid waste landfill. The portion of the site south of the East Hills Rail Line contains completed landfill cells, the principal site access, office and administration buildings and the current waste sorting (recycling) operations.

Figure 2 shows the proposed MRF is located within the existing GWS site, hence there site is surrounded by land already used for industrial activities.

4.4 Hours of operation

The proposed operating hours of the MRF will be concurrent to the existing GWS site operating hours. It is proposed that the facility will operate from 6.30am to 4.30pm Monday to Friday and 8am to 4pm Saturdays. Access until 6pm Monday to Friday will be required for maintenance. Occasional out-of-hour access will be required to cater for night road works and similar operations. It is expected that any such out-of-hours' work will be infrequent and unobtrusive.

4.5 Operational Process

The MRF intends to recycle and process waste produced by the Construction and Demolition (C&D), and Commercial and Industrial (C&I) sectors to produce goods for resale to the construction markets.

Strict quality controls will be used to ensure the quality of the incoming materials, and this in turn will underpin the quality of the final saleable product.

Anticipated waste classifications which are to be accepted and processed on site are:

- C&I waste (typically paper/ cardboard, plasterboard, ceramics, natural and manufactured timbers, metal, green waste, plastics (hard and soft) and glass);
- C&D waste (asphalt, concrete, brick, crushed concrete, concrete plant washout, concrete waste from batching plants);
- Foundry sand;
- Virgin Excavated Natural Material (VENM) – including sandstone; and
- Excavated Natural Material (ENM).

The operations carried out on site will follow these operational steps:

- 1 Receipt of waste materials.
 - a Materials are first evaluated by undertaking source checks prior to arrival on site, and spot checks upon arrival at the site.
 - b Materials received will be charged based on vehicle Gross Vehicle Mass. The addition of a weighbridge for future operations is included in the development application.
- 2 C&I materials are separated into different waste streams and stockpiled in relevant areas on site. Mechanical or manual sorting and processing is then undertaken.
 - c Green waste and timber is stockpiled for mulching and sale.
 - d Paper/cardboard and plastics are separated for baling and recycling.
 - e Metals and glass are separated for recycling.
- 3 C&D materials are processed by the following methods depending on the type of treatment required:
 - a Breakdown/ pre-processing — material that is delivered to the site in large sections (over 600mm) is first broken down into manageable sizes using a pulveriser attached to a 40 tonne excavator;
 - b Initial processing (pulverising) to remove reinforced steel, this is done using a standard type excavator. The steel, once removed is separated and stored until taken off-site for recycling;
 - c The pulverised material is then crushed using mobile plant;
 - d The crushed material will then be blended into the finished product and stockpiled for sale. This function will be carried out using a front-end wheel loader;
 - e The finished product will be loaded and weighed for dispatch using machinery buckets with weighing capabilities that connect via Wi-Fi back to the administration office for purchase invoicing; and
 - f A water cart equipped with spray nozzles will be kept onsite permanently to be used systematically and/ or in periods of high wind for dust management.

GWS will implement a MRF Management Plan as part of their continued commitment to ensuring the safety and well-being of all employees, contractors and visitors at all times. Strict quality controls will be used to ensure the quality of the incoming materials, and thus in turn underpin the quality of the final saleable product. Quality control management will include:

- Ensuring the quality of incoming materials;
- Avoiding raw material stockpile cross contamination; and
- Tracking of the materials source and progress through the facility.

In line with the current process adopted at GWS, the Recycling Facility will not accept hazardous materials such as asbestos and chemical waste. Additionally all personnel will be required to undertake asbestos awareness training as part of the site induction process and ongoing training program.

Figure 3 presents the proposed process flow path for the MRF.

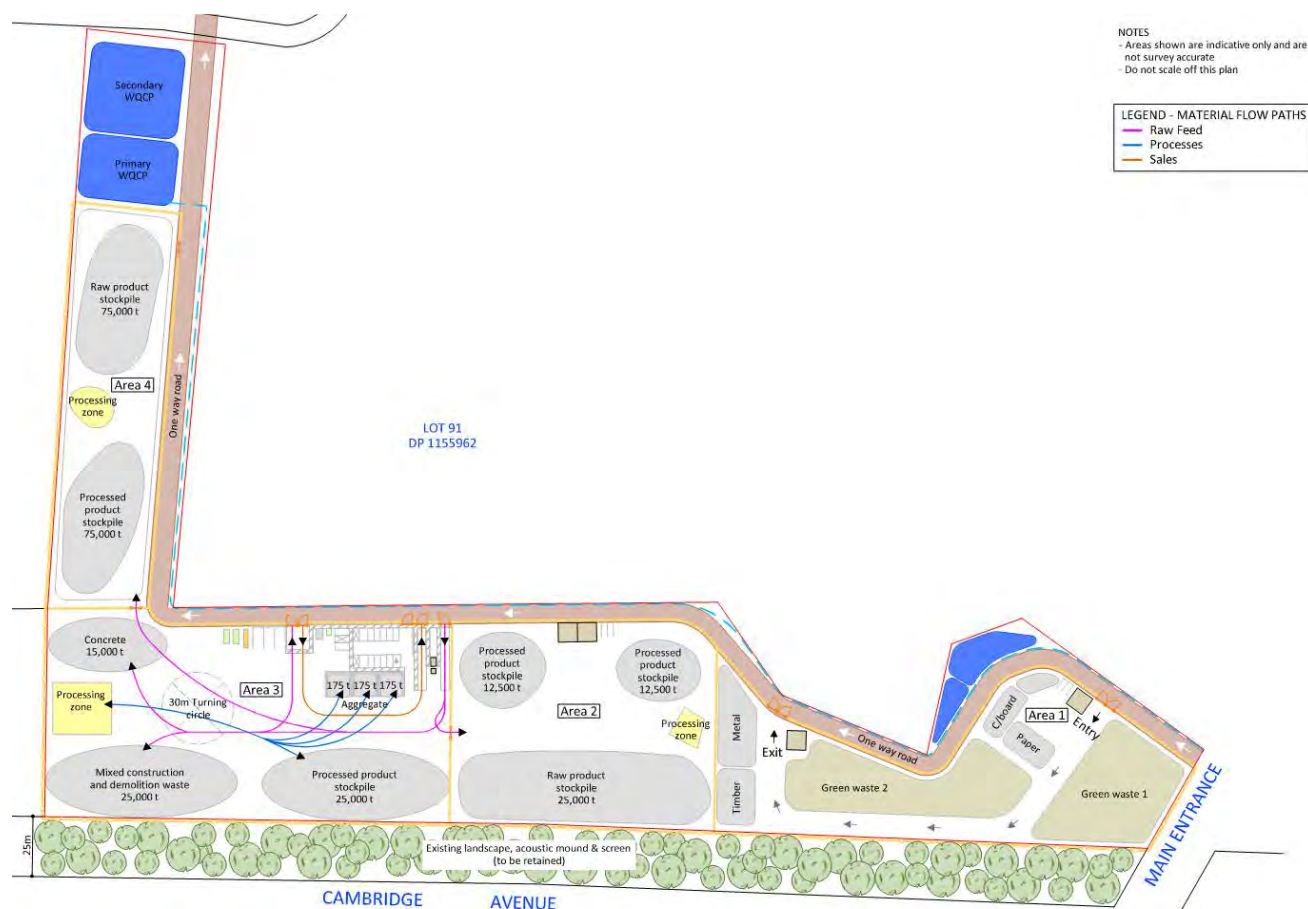


Figure 3 Process Flow Path for proposed MRF

4.6 Materials on Site

Based on the experience of GWS existing operations, the quantity of waste generated by the proposed facility that cannot be reused or recycled is considered to be minimal. This is because all impurities removed in the crushing process (for example, wood and scrap metal) will be sorted and re-distributed to the appropriate recycling section of the facility. The proposed MRF layout and storage capacity has been carefully considered. In total, the facility is expected to process a maximum volume, in the order of 450,000 tonnes of material per annum, distributed across the four areas.

It is anticipated the maximum material and quantity stored at the facility at any given time is presented in Table 1.

Table 1 Storage Capacity of MRF

Material	Quantity (tonnes)	Classification
Mixed C&D waste	25,000	Inert
Green waste 1 and 2	2,000	Combustible material
Timber	2,000	Combustible material
Paper	1,000	Combustible material
Cardboard	1,000	Combustible material
Glass and Plastic	2,000	Glass is Inert Plastic is combustible material
Metal	2,000	Inert
Raw product stockpile	25,000	Inert
Processed product stockpile 1	12,500	Inert
Processed product stockpile 2	12,500	Inert
Processed product stockpile 3	25,000	Combustible material
Processed product stockpile 4	75,000	Inert
Concrete	15,000	Inert
Raw product stockpile	75,000	Inert

4.6.1 Materials Produced

The aim of the MRF is to recycled products produced on site and sell back into the construction market. The products produced at the proposed MRF are listed in Table 2.

Table 2 MRF Products for Re-sale

Material/ Product Type	Applications	Classification
Recycled Aggregates	Landscaping, filter material, concrete products, pipes manufacture, asphalt products, road applications, backfill, concrete blocks, and drainage materials.	Inert
Recycled Pipe Bedding	For the application of and not limited to bedding sand and fill under concrete slabs.	Inert
VENM/ ENM	Engineered and non-engineered fill applications such as subgrade replacement, reinforced earth wall fill, pavement applications.	Inert
Recycled General Fill	Filter material, select fill, re-enforced earth wall select fill, fill for structural applications.	Inert
Road base	Engineered and non-engineered applications. This includes is not limited to local roads, highways, hardstand and car parks.	Inert
Timber Mulch	Landscaping, chicken bedding for agriculture purposes, council use.	Combustible material
Green Waste	Erosion control, composting.	Combustible material

5 Hazards Identification

The raw materials and products produced at the MRF listed in Table 1 and Table 2 are classified as combustible materials according to NSW Planning – Storage and Handling of Dangerous Goods – Code of Practice 2005. 'Combustible material' is defined as 'any type of combustible material, and includes without limitation C2 combustible liquids and empty combustible containers, such as paper bags, fibre board drums and boxes, plastic containers and liners for containers, and wooden boxes and barrels'.

Any material at the MRF site that contains wood, paper, fibre, cardboard, plastic or organic material has been classified as 'Combustible material'. Combustible materials have the potential to ignite, burn, support combustion, or release flammable vapours. Wood is by far the most common combustible material used for structural purposes in building construction.

A high level hazard identification desktop workshop was conducted by ACOR MCE. Table 3 presents the results of the hazard identification workshop. The table includes all identified occupational health and safety hazards that may present a risk to the public, employees and contractors working on the proposed development.

Table 3 Hazard Scenarios

Hazard Scenario	Potential Consequence	Existing Controls	Comment/ Recommendations
Spontaneous combustion of green waste piles	On-site fire and smoke generation that could have off-site effects.	Prohibit smoking and naked flame to designated smoking areas. Employee induction and education. Regular inspection of waste piles. Plant maintenance. Management of vegetation and debris. Management of stockpile moisture content.	Develop an Emergency Response Plan specific to the MRF. Implement a hot work permit system. Implement formal site 'close-down' procedures to inspect the site for smouldering fires.
Hydrogen sulphide (H ₂ S) gas generation in C&D debris landfills has been associated with the biodegradation of compounds containing sulphur.	H ₂ S is a toxic gas with a very unpleasant odour. The odour threshold is lower than the toxic threshold Long term exposure can cause injury to on-site personnel.	Pile located in open space with natural air circulation, no confined spaces. Pile size will be minimised. Pile is moved or processed at a consistent rate. If the pile isn't moved or undergone processing, the pile will be turned over.	The existing landfill has not experienced any odour issues with neighbouring land owners; the proposed MRF is expected to have negligible odour impact. Develop a stockpile management plan for the facility.

Hazard Scenario	Potential Consequence	Existing Controls	Comment/ Recommendations
Methane generation from biodegradation of green waste, C&D piles.	Methane is a flammable gas and can ignite resulting in a localised explosion or fire.	<p>Prohibit smoking and naked flame to designated smoking areas.</p> <p>Employee induction and education.</p> <p>Regular inspection of waste piles.</p> <p>Pile located in open space with natural air circulation, no confined spaces.</p> <p>Pile size will be minimised.</p> <p>Pile is often tossed, watered and monitored.</p> <p>If the pile isn't moved or undergone processing, the pile will be turned over.</p>	<p>Develop a stockpile management plan for the facility.</p> <p>Develop an Emergency Response Plan specific to the MRF.</p> <p>Implement a hot work permit system.</p>
Fire in glass and plastics pile.	A plastic fire can create toxic smoke with potential off-site impact.	<p>Pile size will be minimised.</p> <p>Prohibit smoking and naked flame to designated smoking areas.</p> <p>Employee induction and education.</p>	<p>Develop an Emergency Response Plan specific to the MRF.</p> <p>Implement a hot work permit system.</p>

Hazard Scenario	Potential Consequence	Existing Controls	Comment/ Recommendations
Use of the pulveriser, mulcher, baling of various organic materials, processing on site has the potential to generate a combustible dust.	Combustible dust can ignite (in the presence of an ignition source*) and result in a localised explosion or fire.	<p>Water cart used to reduce dust generation.</p> <p>Processing conducted in open, well-ventilated area.</p> <p>One dump truck rigged as a dual water cart with sprayers on the back and a fire hose on the front.</p> <p>Spark proof/ well maintained machinery and equipment designed for crushing.</p> <p>Fire extinguishers located near equipment.</p> <p>Sprinkler systems in permanent locations will control dust to the point where potential for fire is minimised.</p>	<p>Develop an Emergency Response Plan specific to the MRF.</p> <p>Implement a hot work permit system.</p> <p>Ensure regular maintenance of equipment removes dust accumulation.</p>
External fire threats, lightning, arson (intruders) and bush fire.	Burning embers from an external fire threat can ignite combustible material stored at the site.	<p>Neighbourhood watch, a fire in this area would be reported and controlled by local fire brigade.</p> <p>Maintain fire breaks and reduce vegetation around the facility.</p> <p>Water carts at the facility used to keep piles moist and reduce fire potential.</p>	<p>Develop an Emergency Response Plan specific to the MRF.</p> <p>Prepare and annually review a fire risk assessment</p>

Note: 'ignition source' means any source of energy sufficient to ignite combustible dusts, combustible fibres, flammable vapours, flammable gases or flammable or combustible fumes and includes the following: naked flame, exposed incandescent material, hot surfaces, radiant heat, spark from mechanical friction, spark from static electricity, electrical arc, or any electrical, electronic, mechanical or other equipment.

5.1 Results

A qualitative Level 1 assessment was conducted for the proposed MRF. Level 1 assessment is a qualitative assessment based on comprehensive hazard identification to demonstrate that the facility does not pose a significant threat.

The level of assessment was based on;

- No major off-site consequences an societal risk is negligible;
- The necessary technical and management safeguards are well understood and readily implemented; and
- There are no sensitive surrounding land uses.

6 Fire Assessment

The identification of hazardous materials and incidents has been identified in the previous section. This section addresses the fire prevention strategies and measures in place at the proposed MRF. An Emergency Response Plan needs to be developed for the MRF in co-ordination with the existing GWS operations.

6.1 Prevention and Detection

The first element of fire safety is prevention. Suitable design and layout of the facility and operating procedures and arrangement are important aspects of fire prevention. GWS plans to prevent fire at the proposed MRF by;

- Eliminating ignition sources near dusts and combustible material;
- Prohibit smoking and naked flame to designated smoking areas (no smoking policy for employees and signage for visitors);
- Employee induction and education on fire prevention;
- Regular inspection of piles;
- Sprinkler systems will be installed in permanent locations to control dust to the point where potential for fire is minimised;
- Site security (fencing, locked gates when facility is closed, gate houses for visitors);
- Plant maintenance;
- Keeping maintenance and activities that can produce sparks such as welding conducted away from combustible material piles;
- Avoiding conditions that can lead to spontaneous combustion (e.g., moisture between 25 – 45 percent and temperatures above about 93°C);
- Keeping stock piles low and turning them when the temperature exceeds 60°C;
- Management of vegetation and debris; and
- Designing the facility for access by fire fighting equipment, including clear aisles among piles and access to an adequate water supply.

6.2 Fire Suppression and Control

Fire suppression and control is an essential element of preventing escalation of the risks of combustible material. All fire protection and detection equipment should conform to appropriate Australian Standards.

Equipment such as couplings, fire fighting media, hose reels, hydrants and monitors should be selected and installed in consultation with the fire brigade to ensure compatibility. Fire fighting equipment at the premises should be capable of being used with the equipment used by the local fire brigade, without adaptation or modification (e.g. all fittings and couplings need to be compatible).

Sufficient spacing between stockpiles will be maintained to allow access in case of emergency and to help prevent the spread of fire. This spacing should at least be equal to the height of the stockpile or adequate for emergency vehicle access, whichever is the greater.

It is recommended GWS provide an emergency tipping area for waste loads identified to be on fire or otherwise deemed to be an immediate risk.

6.2.1 Portable Fire Extinguishers

Portable fire extinguishers should be installed around the facility near operating machinery and entry/exit points to the site, processing areas and sheds. Fire extinguishers are to be installed and maintained in conformance with appropriate Australian Standards.

Fire protection systems and equipment should be inspected, pressure tested, serviced and recharged as necessary at regular intervals to ensure that it is always fully operational.

6.2.2 Location

Fire extinguishers should be wall mounted on a hook or bracket, or an unlocked cabinet, at a suitable height and with signage. Where the extinguisher could be subject to unauthorised interference, the cabinet may be locked providing it has a glass panel that can be broken to remove the extinguisher in the event of a fire.

Fire fighting equipment should be located to achieve the following:

- All personnel, storage areas (including sheds and processing zones), equipment and other items being protected can be directly reached by the fire fighting medium;
- It is readily accessible and unobstructed in the event of an incident, preferably adjacent to exit doors or on exit routes;
- It is in a conspicuous position (all fire fighting equipment should be clearly marked and labelled in conformity with the relevant Australian Standards);
- All mobile plant is fitted with an appropriate type and size fire extinguisher consistent with its operation;
- All vehicles are fitted with an appropriate type and size fire extinguisher consistent with its operation
- It is protected from damage (e.g. from vehicle collision and deterioration from the weather);
- All operators/ site fire crew are trained in the use of fire protection equipment.

6.3 Fire Water

GWS will have a water cart which will be used to reduce dust generation at the MRF. One dump truck rigged as a dual water cart with sprayers on the back and a fire hose on the front. The water cart can provide approx. 20,000-40,000 litres of water. This volume would minimise escalation of fire until the local fire brigade arrive.

6.3.1 Arrangements for containing contaminated fire fighting water

Hydrological impacts of the development, groundwater, flood management, accident spill management measures will be completed as part of the Flood and Stormwater Management Assessment. Consequently contaminated fire fighting water will be managed similarly to spill management and stormwater. The site will be graded to ensure that stormwater run-off is directed to stormwater treatment devices, capturing all rainfall across the development footprint, passing through appropriate sedimentation and water quality controls and piped into a retention pond on site.

The site will be surrounded by a 0.5m earth bund. All stormwater and hence fire fighting water will be captured and maintained on-site. This prevents off-site contamination. The stormwater treatment devices will have the capability of treating contaminated fire fighting water.

7 Recommendations

The following recommendations were developed during the hazard identification and fire assessment.

1. Develop a stockpile management plan for the facility.
2. Develop an Emergency Response Plan specific to the MRF.
3. Implement a hot work permit system.
4. Implement formal site 'close-down' procedures to inspect the site for smouldering fires.
5. Consider purchasing a thermal imaging camera to detect compost pile hot spots.
6. GWS should consult with the local fire brigade before selecting and installing fire equipment to ensure compatibility.
7. Prepare and annually review a fire risk assessment.
8. GWS should provide an emergency tipping area for waste loads identified to be on fire or otherwise deemed to be an immediate risk.

8 References

- [1] National Transport Commission - Australian Dangerous Goods Code (ADG) Seventh edition, 7.3 August 2014
- [2] NSW Department of Planning – Storage and Handling of Dangerous Goods – Code of Practice 2005
- [3] NSW Department of Planning – Hazardous and Offensive Development Application Guidelines Applying SEPP 33; January 2011
- [4] NSW Department of Planning – Hazardous Industry Planning Advisory Paper (HIPAP) No.2. – Fire Safety Study Guidelines; January 2011
- [5] NSW Department of Planning – Hazardous Industry Planning Advisory Paper (HIPAP) No. 6 – Hazard Analysis; January 2011
- [6] EPS, Glenfield Waste Disposal Pollution Incident Response Management Plan; July 2012
- [7] EPS, Glenfield Recycling Facility State Significant Development Support Documentation; November 2013
- [8] Environmental Services Association (endorsed by EA, HSE, CFOA, ESA & WISH) – Reducing Fire Risk at Waste management Sites – Draft Fire Control Guidance; 27 June 2014 (Consultation Draft)