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**Re: Wagga Lithium-Ion Recycling proposal**

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**From** Toni McKay <Toni.McKay@safework.nsw.gov.au>

**Date** Fri 2026-03-27 13:43

**To** Christopher Ritchie <chris.ritchie@planning.nsw.gov.au>

**Cc** Michael Lahoud <michael.lahoud@planning.nsw.gov.au>; Ellen Luu <Ellen.Luu@planning.nsw.gov.au>; Patrick Quinn <Patrick.Quinn@safework.nsw.gov.au>

Good afternoon,

SafeWork has reviewed the response to submissions report and would like to make a comment.

We raised the following regarding the LPG installation and recommended consideration of earth bunding.

(1) LPG storage vessels and/or associated equipment

a. Ensure that LPG installations comply with AS/NZS 1596.

**b. Consider mechanical protection in the event of a catastrophic incident on site (e.g. earthen mound)**

The response noted the following in relation to our issues raised stated the following:

1. The PHA has included a risk assessment for the catastrophic failure of the LPG storage vessel and the hazard identification table within the PHA contains the control of complying with AS/NZS 1596. The results of the consequence impact zone being outside any occupied building and the low frequency of a catastrophic failure event indicate that the existing controls listed in the hazard identification table are managing the risk so far as is reasonably practicable (SFAIRP) **and mechanical protection, such as an earthen mound, is not required.**

From the response, there may have been an assumption that the mechanical protection such as an earthen mound is there to protect the surroundings in the event of a catastrophic failure of the LPG storage vessel. Such protection would also protect the LPG vessels in the event of a catastrophic incident such as a fire or explosion elsewhere on the facility (and protect the tanks from being hit by flying projectiles/debris and also from radiant heat). The risk assessment may already have taken this into

consideration when determining that mechanical protection such as earth mounding is not required. If not, it should be part of the assessment.

With regards to concerns regarding the proximity of battery and LPG storage to the transmission easement, this appears to be covered in the response to submission by Transgrid. Safework has no further comments on this.

Thank you. And again, apologies for the delay in responding to your previous correspondence.

Regards,

**Toni McKay**

A / Manager | Dangerous Goods and Explosives  
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**SafeWork**

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