

15 March, 2016
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Reference: 200213(SEPP33)-RPTFinal(Rev0)-15Mar16

Altis Property Partners
GPO Box 4456
SYDNEY NSW 2001

Attn: Mr. Luke Wilson

Re: Warehouse and Logistics Estate (SSD 7173)

Dear Luke,

Many thanks for your inquiry regarding the application of State Environmental Planning Policy No.33 (Hazardous and Offensive Developments) to the proposed Warehouse and Logistics hub at Orchard Hills, NSW. I have conducted the review (attached) and based on the results of the assessment I conclude that SEPP33 does not apply to the proposed warehouse.

The attached SEPP33 assessment for the proposed Warehouse and Logistics hub is fairly self-explanatory, however should you have any queries regarding the assessment, please do not hesitate to contact me on my mobile (0411 659 309).

Yours faithfully,

CORE Engineering



Steve Sylvester
Associate Director
MAIDGC, FS Engineer (TUV 2203/10, EEHA
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ALTIS PROPERTY PARTNERS

WAREHOUSE & LOGISTICS HUB (SSD7173) STATE ENVIRONMENTAL PLANNING POLICY NO.33 ASSESSMENT

1 INTRODUCTION

1.1 BACKGROUND

Altis Property Partners (APP) has proposed to develop a Warehouse and Logistics Hub at 585-649 Mamre Road, Orchard Hills, NSW (the Hub). The hub will comprise 3 warehouse buildings, of which one (Warehouse 7) will contain a number of Dangerous goods (DGs). As part of the development process, APP requested that the Department of Planning and Environmental (DPE) issues the Secretary's Environmental Assessment Requirements (SEARs) so that the appropriate assessments can be conducted and submitted with the Development Application (DA).

As it is proposed to store DGs in warehouse 7, the SEARs (SSD7173) include a requirement to conduct an assessment of the site in accordance with State Environmental Planning Policy No.33 (SEPP33), Hazardous and Offensive Developments. To assist with the preparation of a SEPP33 assessment, APP has commissioned CORE Engineering Group (CORE) to review the proposed DG storage and handling at the site and to report on the finding of the review with regards to the application of the policy.

This document provides CORE's assessment of Warehouse 7 at the Warehouse and Logistics Hub, Mamre Road, Orchard Hills, NSW.

1.2 OBJECTIVES

The objective of the study is to identify whether SEPP33 applies to the proposed Warehouse 7 storage at the Warehouse and Logistics Hub, Mamre Road, Orchard Hills, NSW.

1.3 SCOPE OF WORK

The scope of work is for a SEPP33 assessment of the proposed Warehouse 7 storage at Warehouse and Logistics Hub, Mamre Road, Orchard Hills, NSW. The scope is for the assessment of SEPP33 application to the proposed warehouse only and does not include the preparation of additional documentation (e.g. Preliminary Hazard Analysis), should SEPP33 apply to the site.

1.4 QUALIFICATIONS OF THE ASSESSOR

The SEPP33 assessment was conducted by Mr. Steve Sylvester, Associate Director at CORE. Steve is a mechanical engineer (BEng.) with over 45 years engineering experience, including 20 years in marine and chemical plant operations and over 25 years in engineering consultancy. Steve has conducted over 500 risk and safety engineering studies during his time as a risk engineering consultant, including over 100 SEPP33 related studies. He is a founding member of the Australasian Institute of Dangerous Goods Consultants (www.aidgc.org.au), an internationally accredited Functional Safety Engineer (FSE TÜV 2203/10) and has completed the Electrical Engineering Hazardous Areas (EEHA) competency courses for Hazardous Area Classification. Based on his qualifications, training

and experience, Steve would be classified as a “Competent Person” under the Planning and Assessment Act to review SEPP33 applications.

2 METHODOLOGY

The following assessment approach was applied:

- A list of materials proposed for storage and handling at the Warehouse and Logistics Hub was reviewed;
- From the materials list, a sub-list of Dangerous Goods was developed, along with the quantities of DGs proposed for storage at the facility;
- “Applying SEPP33 – Hazardous and Offensive Developments” (Ref.1) was then reviewed to identify to which of the DGs SEPP33 applied;
- Threshold values were then listed alongside the quantities of DGs, to which SEPP33 applied, and comparisons made to determine the application of the policy;
- A draft report was then developed for review and comment by APP;
- A final report was then completed incorporating changes for points of fact in the draft report.

3 BRIEF DESCRIPTION OF THE WAREHOUSE FACILITY

3.1 LOCATION OF THE PROPOSED APP WAREHOUSE AND LOGISTICS HUB

The proposed Warehouse and Logistics Hub will be located in Mamre Road, Orchard Hills, NSW. **Figure 3-1** shows the regional location of the location proposed site in Orchard Hills. **Figure 3-2** shows the location of the site on Mamre Road.

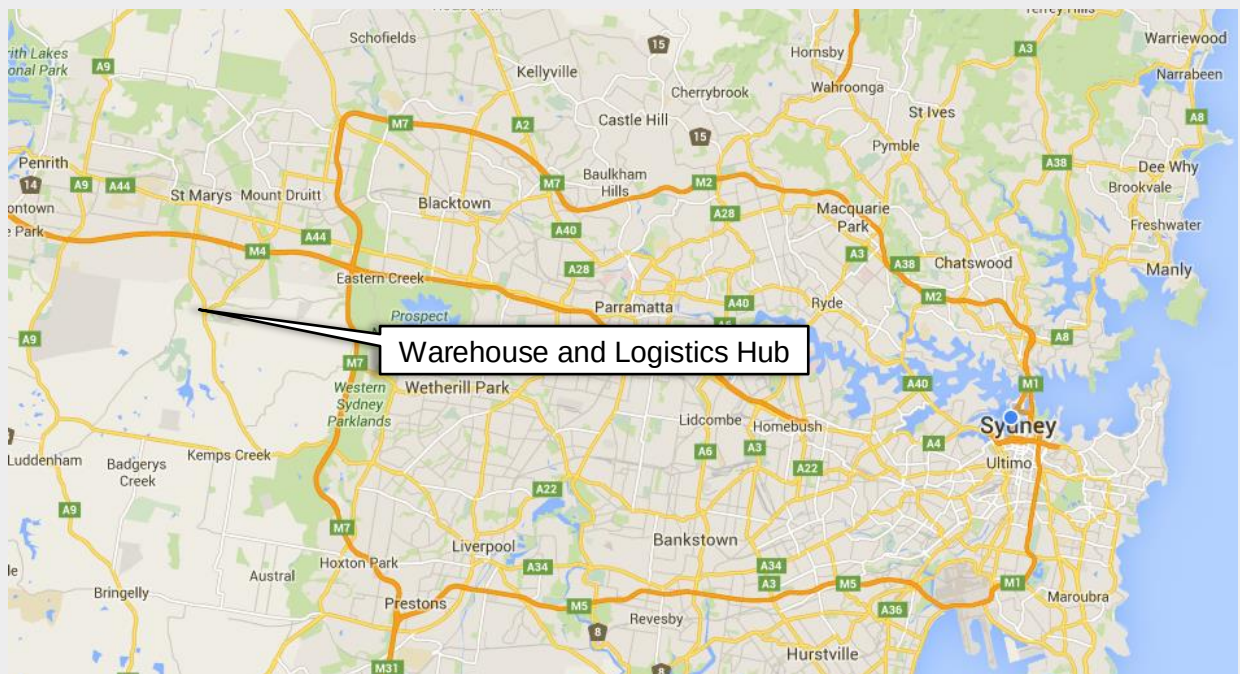




Figure 3-2: Location of the Proposed Warehouse and Logistics Hub – Mamre Road

3.2 BRIEF DESCRIPTION OF THE WAREHOUSE FACILITY

The warehouse complex will be constructed in the location shown in **Figure 3-2** and will consist of three separate warehouse buildings as shown in **Figure 3-3**. As part of operations in the Warehouse on Lot 7 (Warehouse 7), shown on **Figure 3-3**, it is proposed to store a number of Dangerous Goods (see Section 3.3 for details), which will be stored in a separate DG store (see **Figure 3-3**) in accordance with Chapter 7 of the Work Health and Safety Regulation 2011 and the relevant Australian Standard (AS3833-2007, Ref.3). It can also be seen from **Figure 3.3** that Warehouse 7 (Lot 7) faces directly on to Mamre Road.

The warehouse will be “dado” type construction, consisting of concrete walls to 2.4m height and steel frame with sheet steel cladding for the remaining wall height. The roof will also be of steel frame and sheet steel cladding. Floors will be concrete throughout and a two storey office area will be located in the south western corner of the building.

3.3 DANGEROUS GOODS STORAGE

Warehouse 7 (Lot 7) will be used for the storage of a number of motor vehicle spare parts, some of which are classified as Dangerous Goods (DGs), these include:

- Air bag, seat belt tensioner activation devices, Injector Cleaner – Class 9 (not subject to SEPP33, see **Section 4.1** of this document);

- Batteries – Class 8, Packaging Group(PG) III (1,500 kg or 1.5 tonnes),
- Touch Up Paints, radiator reinforcing kit, carpet repair kits - Class 3 PGII (200 L);
- Air-conditioning re-gas kits (Freon Gas) – Class 2.2 (not subject to SEPP33, see **Section 4.2** of this document); and
- Air-conditioning sanitiser - Class 2.1 Aerosols (60 kg) [Note: aerosols are classified as PGIII for the assessment criteria in various codes, standards and regulations (Ref.3)]

As noted earlier, the DGs will be stored within the warehouse area itself following the requirements of the Work Health and Safety Regulation (2011, Ref.2) and AS3833-2007 (Ref.3).

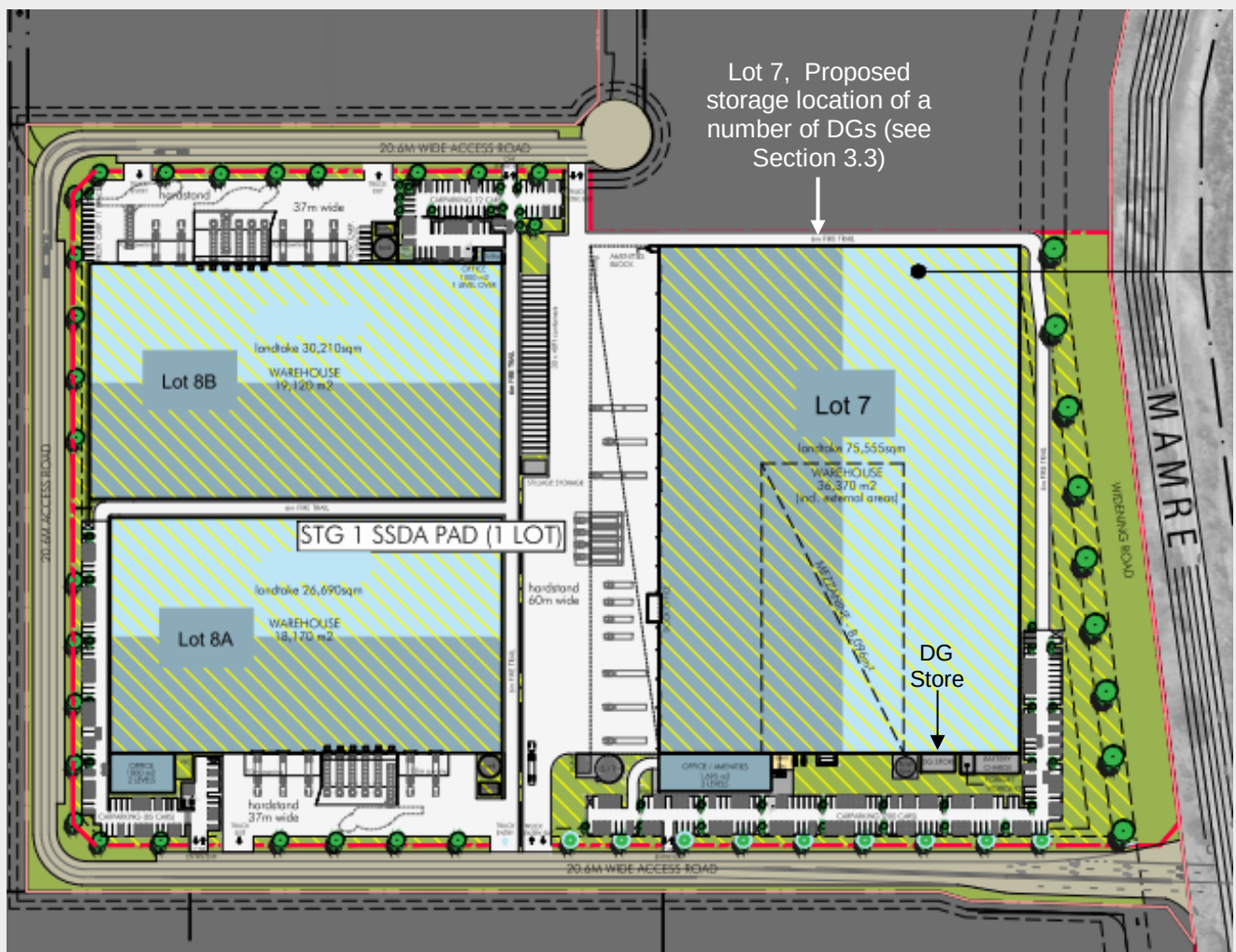


Figure 3-3: Warehouse and Logistics Hub Layout – Mamre Road, Orchard Hills

4 SEPP33 ASSESSMENT (Preliminary Risk Screening)

4.4 SEPP33 GUIDELINES

As noted in the SEARs, due to the storage and handling of DGs, it is necessary to perform an analysis of the type of DGs and, in some cases, the quantity of DGs stored to determine whether SEPP33 applies to the site.

The DPE has issued a document “Applying SEPP33” (Ref.1) that provides guidelines on which DGs are subject to SEPP and the maximum permissible threshold quantities for those DGs to the policy applies. **Appendix A** provides a table, extracted from “Applying SEPP33” (Ref.1), which indicates the maximum permissible threshold quantities for the various DGs. In addition, a graph is provided for flammable liquids (Class 3, PGII & III) against which the storage quantity can be compared to determine whether SEPP33 applies, this graph has also been included at **Appendix A**.

It can be seen from the table in **Appendix A** that Class 9 DGs are not listed and therefore are not subject to SEPP33. This is supported in the note to Table 1 in “Applying SEPP33”, which states:

Applying SEPP 33 | January 2011

Note: Classes 1.4, 1.5, 1.6, 2.2, 7 and 9 are excluded from the risk screening. Classes used are those referred to in the Dangerous Goods Code and are explained in appendix 6.

(Ref.1, Page 17)

Hence, an unlimited quantity of Class 9 materials may be stored on site without triggering SEPP33. Based on this, Class 9s are eliminated from further assessment.

It is also noted that Class 2.2 gases are not subject to SEPP33 (see above), hence, these DGs are also screened out from further analysis.

The remaining DGs, subject to the SEPP33 analysis, are listed in **Table 4-1**, along with the maximum permissible threshold level before SEPP33 applies to the storage.

Table 4-1: DG Storage Quantities and SEPP33 Threshold Quantities

DG Stored	Class/PG	Qty. Stored	SEPP33 Threshold	Reference
Batteries – corrosives	8/III	1.5 tonnes	50 tonnes	Table 3, see Appendix A
Paint, reinforcing kits, carpet repair kits - flammables	3/II	0.175 tonnes	5 tonnes	Figure 9, see Appendix A
Air-conditioning Sanitiser (Aerosols, LPG propellant)	2.1	0.06 tonnes	10 tonnes	Table 3, see Appendix A

Based on the results displayed in **Table 4-1**, three DGs stored at the Warehouse 7 (Lot 7) site are **not** subject to SEPP33. The quantities stored are all below the maximum threshold level permitted for storage before SEPP33 applies.

5 CONCLUSIONS

Based on the analysis conducted in this SEPP33 study for the Warehouse and Logistics Hub, Mamre Road, Orchard Hills, NSW, it is identified that the quantities of DGs proposed for storage and handling at the warehouse do not exceed the maximum permissible threshold quantities listed in Applying SEPP33 (Ref.1).

It is therefore concluded that SEPP33 does not apply to the proposed Warehouse and Logistics Hub at Mamre Road, Orchard Hills, NSW.

6 REFERENCES

1. Applying SEPP33 – Hazardous and Offensive Developments (2011), NSW Department of Planning and Environment, Sydney
2. Work Health and Safety Regulation 2011, under the Work health and safety Act (2011), SafeWork NSW, Lisarow, NSW
3. AS3833-2007, The storage and handling of mixed classes of Dangerous Goods in packages and intermediate bulk containers, Standards Association of Australia, Sydney.

APPENDIX A – SEPP33 THRESHOLD LEVELS

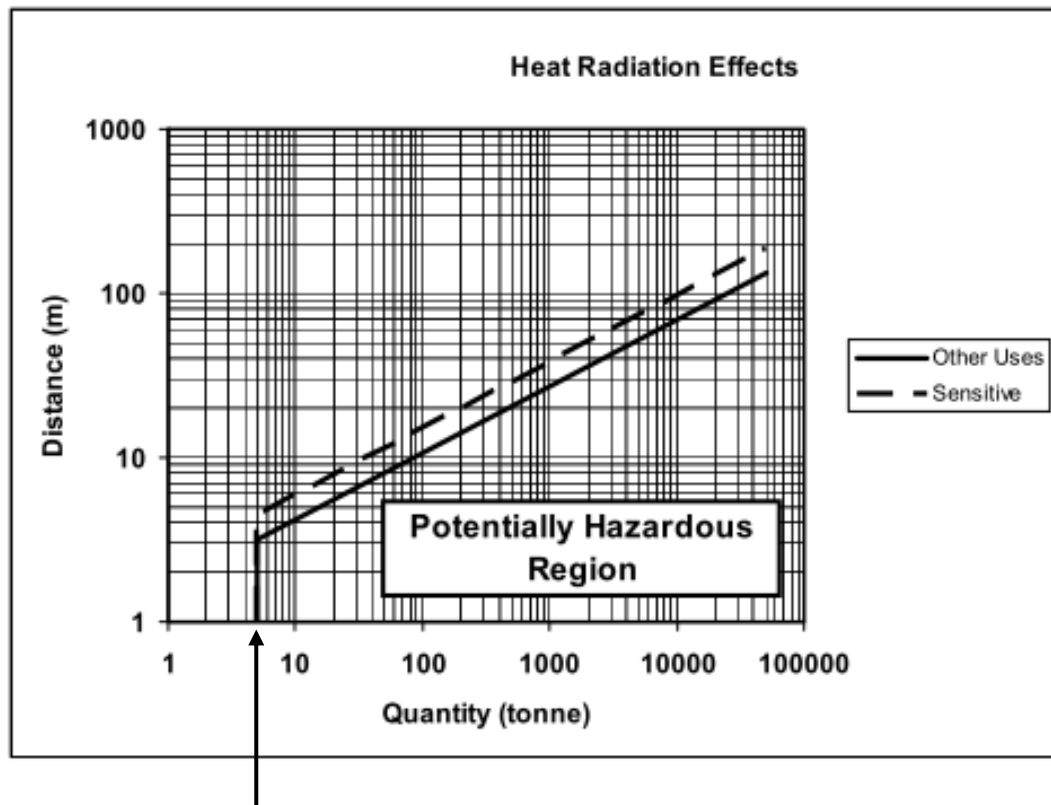
Applying SEPP 33 | January 2011

Table 3: General Screening Threshold Quantities

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')	
	10 tonne or 16 m ³	if stored above ground ← AEROSOLS (LPG)
	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 ← BATTERIES

Note: The classes used are those referred to in the Australian Dangerous Goods Code and are explained in Appendix 7.

Applying SEPP 33 | January 2011

Figure 9: Class 3PGII and 3PGIII Flammable Liquids**FLAMMABLE LIQUIDS**

Potentially hazardous region commences at 5 tonnes, after this separation requirements apply.