# Department of Planning & Environment – comments on RTS, SSD 7421, 20 Hearne Street, Mortdale, 15 February 2017

The Department has provided a summary below of its items that require further information. Numbers correspond to the order of responses in the table in Section 6 of the RTS.

DPE Issue	Unresolved/outstanding issue		
no.			
Traffic			
2	Additional information provided in TIA Letter, however the information lacks any detail regarding management of trucks at the site entry. Figure 2 depicts traffic controls which are all internal - there are no proposed controls at the entrance to avoid conflict with vehicles entering and exiting. If an exiting truck takes a wide berth, an incoming truck would not be able to enter. Further details are required regarding management of vehicles entering and leaving the site to avoid queuing within the road reserve and traffic safety issues.		
3	A stacking plan has been provided which only shows the stacking of heavy rigid trucks on site. There is no plan showing the stacking of semi-trailers collecting sorted materials. There is no indication of how traffic will be controlled at the access way. In particular, how will trucks be directed to the stacking locations. Further, the stacking plan contradicts the internal turning path diagrams with vehicles stacked in areas required for manoeuvring. Further clarification is required.		
4	Exiting trucks have been placed in a location which contradicts the stacking plan diagrams (see below). This requires amendment.  Drivoway  Drivoway  Drivoway  Roof 34. 1m		

Waste			
8	No clear indication is provided as to the number of days per year that 24 hour waste delivery would be required. Would night time deliveries occur every day? Where are the 60 sites used for disposal? Is there a main buyer of the recycled product?		
Water			
11	Is there an alarm system to indicate when the leachate sump is full?		
Stockpile	S		
12	It is unclear how the information provided addresses this issue. The Department requires information regarding the dimensions of the designated stockpile areas of the site where unprocessed and processed waste material would be stored. If 10,000 tonnes of material were to be stored on the site at any one time, would there be sufficient space for this? Details of the storage capacity of the site should be provided and demonstrated to be adequate.		
Process	·		
13	The explanation provided is inadequate. Whilst the processing capacity of the machinery may be sufficient to process (more than) 300,000 tpa of waste material, the Department's concerns also relate to the size of the site and its ability to support this amount of throughput. Provide full details of the method for processing waste materials including:  • unloading procedures and timeframes, especially in relation to the situation where the site is fully "stacked" with incoming trucks. How long would it take to unload each truck and how would this affect build-up of trucks behind it given only one truck can unload at any one time?;  • storage timeframes;  • processing timeframes;  • quality control;  • outputs; and  • methods for loading and removal from the site.		
	In particular, information should be provided regarding the site's capability to store and process the waste received during night time, whilst still receiving more waste during the day without excessive build up occurring i.e. there would be no processing between 10pm and 6am while, according to Appendix A – TIA letter, 26 truckloads of waste are predicted to be delivered in this period, with another 17 truckloads between 6am and 7am.  Further details should also be provided regarding the machinery (screens etc) proposed for waste separation, as well as the method of conveyance of separated products into the material bays prior to removal.		

#### Sheelagh,

I refer to your attached e-mail dated 15<sup>th</sup> December 2016 below seeking further Council comment relating to the amended information lodged for the Waste Resource facility at 20 Hearne Street Mortdale.

Council objects to the operation of the facility between 10pm and 6am on the basis of noise impacts on nearby residential receivers.

Council objects to the excessive nature of the operation on a site that is of insufficient size to accommodate for both the site operation and vehicle queueing without placing an additional truck queueing burden on Hearne Street.

From the various addendum reports submitted in response to Council's initial concerns:

"State Significant Development Application 15\_7421 – Response to Submissions Report"

"Response to Submissions Letter – Traffic Vehicle Movements" prepared by The Transport Planning
Partnership dated 5 December 2016, TTPP REF 16222

"Noise and Vibration Impact Assessment" prepared by SLR Consulting Australia Pty Ltd

The following comments are provided:

1. MRV trucks laden with waste for processing enter the site and queue to await an available slot for unloading. Semi-trailers/truck and dog enter the site and queue awaiting an available slot for the loading of processed waste. The estimated time required for these movements is 25 minutes ("Response to Submissions Letter – Traffic Vehicle Movements" p 7). While pick up is to be limited to "outside of peak" (p7) it is unclear whether this is peak operation of the facility (during the middle of the day) or the am and pm peak traffic times.

The vehicle stacking plan "Response to Submissions Letter – Traffic Vehicle Movements" Attachment C) conflicts with many of the provided swept path arrangements for 19m vehicles indicated in ("Response to Submissions Letter – Traffic Vehicle Movements," Attachment G). The introduction of semi-trailers/truck and dog vehicles into the site has the potential to impact on the timing of queueing arrangements within the site which may increase the assumed vehicle processing turnover time of 25 minutes (as indicated on page 7). Any potential conflict between queueing and turning vehicles that leads to vehicle queueing on Hearn (or surrounding) streets is not supported.

68 semi-trailer in/out movements are stated to be required per day to "transport waste from the Mortdale site to other waste processing facilities..." ("Response to Submissions Letter – Traffic Vehicle Movements" page 19). Should 25 minutes be required for these vehicle movements ("Response to Submissions Letter – Traffic Vehicle Movements" page 7) some conflict of queueing during peak operation will be unavoidable. This would lead to vehicle queueing on the surrounding street network and this outcome is not supported.

The 68 required daily pick up movements is highly likely to result is some conflict between the large (semi-trailer/truck and dog vehicles) and the smaller drop-off MRV's as the allocated queueing spaces conflict with the required turning circles of the pick-up vehicles. This is likely to result in queuing of trucks on Hearne (and surrounding) streets. Council strongly objects to this outcome. As vehicle movements and queueing for the proposed

operation are not likely to be able to be accommodated within the boundaries of the site, Council argues that the site is of an insufficient area for the use at the tonnage proposed.

- 2. During after-hours operation (10pm 6am), processing on site is limited however the following noise generating activities are required:
  - a. Vehicle movements to and from the site; Of greatest concern are the heavily laden semitrailer/truck and dog combinations that will require braking at the Hearne Street/Boundary Road intersection (directly adjacent to residential receivers), idling while giving way and then accelerating from this stopped/idling position. Further noise issues are also likely when these heavily laden vehicles are required to accelerate up the hill along Boundary Road to the Forest Road intersection. "Noise and Vibration Impact Assessment" Table 3 identifies the corner of Boundary Road and Treloar avenue to have a maximum Truck pass-by dBA of 60 70 however no estimated maximum dBA is provided for the likely braking, stopping, idling and acceleration out of the Hearn Street/Boundary Road intersection, nor is the gradual up-grade acceleration of semitrailers/truck and dog vehicles considered on Boundary Road on the approach to Forest Road. These vehicle movements are the most likely to result in negative impacts on adjacent residential receivers and must be addressed in the supporting information.

However it is likely that these vehicle movements will generate noise that is greater than the assumed truck pass-by (i.e. movements that are presumably already under acceleration) reading of 60-70dBA. This is highly likely to affect health and wellbeing in accordance with Section 4.1.1 of "Noise and Vibration Impact Assessment" as "68 trucks are estimated to transport waste from the Mortdale site to other waste processing facilities per day" ("Response to Submissions Letter – Traffic Vehicle Movements" prepared by The Transport Planning Partnership; p19) with these movements scheduled to occur during "the later afternoon, night time and early morning." "Response to Submissions Letter – Traffic Vehicle Movements" prepared by The Transport Planning Partnership; p19). Even using a conservative linear estimate between the later afternoon (4pm) and the early morning (6am) this would result in up to 5 vehicle movements per hour at the Hearne St/Boundary Rd intersection. Chapter 4.4.4 of The "Noise and Vibration Impact Assessment" prepared by SLR Consulting Australia Pty Ltd (p11) states that "one or two noise events per night, with maximum noise levels of 65-70 dBA, are not likely to affect health and wellbeing significantly." From this it is then assumed that up to 5 such disturbances per hour during the night is likely to significantly impact on the health and wellbeing of residential receivers adjacent to the Hearne Street/Boundary Road intersection.

In summary insufficient assessment of the noise impact and noise frequency has been provided, especially at the Hearne Street and Boundary Road intersection and on the steeper up-grade on Boundary Road approaching Forest Road. On the information provided it is likely that the night-time movements of vehicles (especially heavily laden semi-trailers/truck and dog combinations) will impact significantly on residential receivers adjacent to this intersection and on Boundary Road. As such Council strongly objects to the night time (10pm – 6am) operation of the proposal.

b. MRV's will enter the site and undertake the tipping of waste. The "Noise and Vibration Impact Assessment" recommends that "the loading and unloading of heavy materials are addressed within the OEMP with protocols to ensure that such products are handled

through the use of appropriate plant to minimise vibration" (page 16). It does not appear that the OEMP has identified what this "appropriate plant" may be, however it is assumed that an excavator would be used to decrease the distance from which concrete blocks/bricks would be dropped on to the tipping floor.

The abovementioned operation is identified as resulting in the following LAMax dBA per item:

Round trip truck entry dump and exit – 111 dBA Volvo ECR145C Excavator – 110dBA

"Noise and Vibration Impact Assessment" prepared by SLR Consulting Australia Pty Ltd, Table 6.

The cumulative impact of this noise on-site has not been identified in the "Noise and Vibration Impact Assessment." Council strongly objects to any additional noise on-site between 10am and 6pm that would impact (or potentially impact) on the sleeping patterns of nearby residential receivers.

In summary, it would appear that the site is of insufficient size to accommodate both site operation/vehicle queueing and vehicle movements at the capacity proposed. The supporting information also provides insufficient assessment of the impacts of vehicle noise and cumulative night-time (10pm-6am) processing required on site and from the information provided it would appear that the proposal will have a significant impact on the health and amenity of nearby residences especially on Boundary Road. On this basis Council does not support the current proposal.

Regards,

Peter Nelson



DOC17/63534

Kelly McNicol
Team Leader
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

**EMAIL** 

#### Dear Mr McNicol

I am writing to you in relation to the proposed expansion of the Hearne St Mortdale Resource Recovery Facility (SSD 7421) located at 20 Hearne St, Mortdale ("the Premises"), from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day. The EPA notes that Mortdale Recycling Pty Ltd hold environment protection licence no. 20622 for scheduled activities at the Premises.

The EPA provided you with comments in relation to this proposal on 29 August 2016 and 2 September 2016 following the public exhibition period. The EPA was unable to provide conditions of approval at there was insufficient information provided.

The EPA has now reviewed the Proponent's response to submissions and has determined that it is now able to provide conditions of approval for the proposal. Please see the EPA's conditions of approval in Attachment A.

The Proponent should be made aware that, should approval be given for the proposal by DPE, the Proponent will need to submit a licence variation application to the EPA to amend environment protection licence no. 20622.

#### Barry Avenue

In relation to Barry Avenue, the EPA notes that predicted noise levels from the additional traffic generated by the proposal are acceptable along the simulated route. However, this route assumes that trucks **do not** access the facility via Barry Avenue.

One item which DPE may wish to consider is the inclusion of a condition on any approval that requires the Proponent to include, if possible and enforceable, clauses in any contracts with truck drivers requiring them not to use Barry Avenue. Alternatively, Council may be able to place weight restrictions on Barry Avenue. This would lessen noise from truck traffic for those residents on Barry Avenue.

The EPA notes that, while the Proponent has included a commitment to "encourage all vehicle access to the site via Boundary Road and Hearne Street" in their Statement of Commitments, Barry Avenue is a public road that any road registered vehicle is entitled to use.

If there is no enforceable method to restrict trucks associated with the proposal from accessing the facility via Barry Avenue, the EPA then strongly recommends DPE consider requiring the Proponent via conditions of approval to provide an assessment of traffic noise impacts on this route.

If you have any questions in relation to this matter, please contact Deanne Pitts on (02) 9995 5752.

Yours sincerely

**GREG SHEEHY** 

**Director Waste Compliance** 

**Environment Protection Authority** 

Att:

Attachment A – EPA's Conditions of Approval

#### **ATTACHMENT A**

The EPA has reviewed the documents placed on Public Exhibition for the expansion of the resource recovery facility at Hearne St, Mortdale from 30,000 tpa to 300,000 tpa. It is also proposed to permit waste movements in and out of the facility 24 hours per day:

The EPA provides the following conditions of approval:

### **GENERAL**

 An Operational Environmental Management Plan ("OEMP") must be submitted to DPE and the EPA for review prior to the site re-commencing waste operations. Waste is not permitted to be received at the Premises without written approval from DPE and the EPA following receipt of the OEMP.

Note: In its previous correspondence, the EPA set out requirements in relation to stormwater and leachate management that must be addressed in the OEMP. The EPA will not approve waste receipt at the premises until those requirements have been satisfactorily addressed.

#### **WASTE**

- The quantity of waste to be received and processed at the Premises must not exceed 300,000 tonnes per annum.
- The quantity of waste to be received and processed at the Premises must not exceed 20,000 tonnes per day.
- All waste processing including loading and unloading must be undertaken inside the building.
- No waste material is to be stored outside of buildings, other than in bins fitted with waterproof covers.
- No putrescible waste is to be received, stored or processed on the site
- Only the following waste types, as defined in the *Protection of the Environment Operations Act* 1997, are permitted to be received at the Premises:
  - Wood waste
  - No-chemical waste generated from manufacturing and services
  - Asphalt waste
  - Soils that meet the CT1 thresholds for general solid waste in Table 1 of the Waste Classification Guidelines (as in force from time to time)
  - Paper and Cardboard
  - o Household waste
  - Office and packaging waste
  - o Building and demolition waste
  - Virgin Excavated Natural Material
- The Proponent must manage any waste generated during demolition and construction works at the Premises in accordance with the "Construction Waste Management Plan" prepared by Dewcape and dated November 2016.
- Disposal records (such as landfill disposal dockets) for all waste disposed of under the CWMP, including asbestos waste, must be retained by the Proponent for 4 years and provided to the EPA if requested.

## AIR

- Activities must be carried out in a manner that minimises the generation of dust.
- The Premises must be maintained in a condition which prevents the emission of dust.
- The Proponent must ensure that no material, including sediment or oil, is tracked from the Premises.

- Trucks entering and leaving the Premises that are carrying loads must cover the loads at all times, except during loading and unloading.
- The building must be fitted with a dust suppression system. The system must be designed and maintained to prevent dust emissions.
- All internal haul roads are to be sealed and appropriately maintained.
- Prior to the commencement of operation, the Proponent must prepare and implement an Air Quality Management Plan that includes, but is not limited to, the following information:
  - i. Proactive and reactive management strategies;
  - ii. Key performance indicator(s);
  - iii. Monitoring method(s);
  - iv. Location, frequency and duration of monitoring;
  - v. Record keeping;
  - vi. Response mechanisms;
  - vii. Complaints handling protocol; and
  - viii. Reporting.

## **NOISE**

## Construction noise limits

Construction of the project is proposed to occur within standard hours, and not exceed the noise management levels at residences. This level of impact can be managed, on any project approval given, by requiring construction of the project to only occur within standard hours:

- **L6.8** Construction work associated with the project must be undertaken:
  - a) between 7:00 am and 6:00 pm, Mondays to Fridays;
  - b) between 8:00 am and 1:00 pm on Saturdays; and
  - c) at no time on Sundays or public holidays.
- **L6.9** Construction work associated with the project may be undertaken outside the hours specified in condition L6.8 if it is:
  - a) construction that causes L<sub>Aeq(15min)</sub> noise levels that are:
    - i. no more than 5 dB above Rating Background Level at any residence in accordance with the *Interim Construction Noise Guideline* (DECC, 2009); and
    - ii. no more than the Noise Management Levels specified in Table 3 of the *Interim Construction Noise Guideline* (DECC, 2009) at other noise sensitive land uses; or
  - b) for the delivery of materials required by the police or other authorities for safety reasons; or
  - c) required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or
  - d) approved through the process outlined in condition L6.10.
- **L6.10** The hours of construction specified under condition L6.8 may be varied with the prior written approval of the Secretary. Any request to alter the hours of construction shall be:
  - a) considered on a case-by-case or activity-specific basis;
  - b) accompanied by details of the nature and justification for activities to be conducted during the varied construction hours;
  - c) accompanied by written evidence to the Secretary that appropriate consultation with potentially affected noise sensitive receivers and notification of relevant Council(s) and other relevant agencies has been and will be undertaken:
  - d) all reasonable and feasible noise mitigation measures have been put in place; and,
  - e) accompanied by a noise impact assessment consistent with the requirements of the *Interim Construction Noise Guideline* (DECCW, 2009).

# **Operating hours**

- Waste processing activities may only occur between 6am and 10pm Monday to Saturday, with no waste processing permitted on Sundays or Public Holidays.
- Truck movements are permitted 24 hours per day Monday to Saturday, with no truck movements on Sundays or Public Holidays.
- No activities are permitted at the Premises on Sundays and Public Holidays.



File Ref. No:

BFS17/58 (12573)

TRIM Doc. No: D17/3072

Contact:

Station Officer C. Wheatley

The Department of Planning & Environment C/- Sheelagh Laguna GPO Box 39 SYDNEY NSW 2001

E: sheelagh.laguna@planning.nsw.gov.au

19 January 2017

Dear Ms Laguna

## **Response To Submissions Report** Mortdale Resource Recovery Facility (SSD 7421) 20 Hearne Street Mortdale

I refer to the above development proposal's Response to Submissions Report (RTS) which was forwarded to Fire and Rescue NSW (FRNSW) on 16 December 2016. The RTS has been prepared by Mr Anthony Williams of APP Corporation Pty. Ltd. and is dated 5 December 2016 - Revision 5.

The submission from the Department of Planning and Environment (the Department) included the following documents:

- RTS:
- Fire Safety Study (FSS): Prepared by SLR Consulting, Report Number 610.14692.00501-R01-v1.1 dated 25 October 2016 - Appendix D;
- Statement of Commitments Appendix F; and
- Drawing Number 151045 03.2/18 EIS Revision J (site plan).

FRNSW have undertaken a review of the RTS, in particular the responses provided within Section 6 - Tabulated Response to Issues Raised by Agencies and Public. Agency Submission. Item Number 4 relates to comments provided by FRNSW on the Environmental Impact Statement (EIS) in correspondence dated 22 August 2016 (TRIM Document Number: D16/64949).

FRNSW acknowledges the undertaking by the proponent to address each of the items identified by FRNSW (items 1-4) within the EIS submission. Based on the review of the RTS, FRNSW provides the following comments (items (a) - (d)) in response to the RTS:

ABN 12 593 473 110	www.fire.nsw.gov.au	
Locked Bag 12, Greenacre NSW 2190	T (02) 9742 7434 F (02) 9742 7483	
	Locked Bag 12,	



- 1. FRNSW considers the proposed storage of Dangerous Goods as detailed within detailed drawing numbers 151045 03.2/18 EIS Revision I and SY16043c101 Revision E, in conjunction with the information provided within part 6.4.1 of the EIS, to be inconsistent. FRNSW recommends that the proposed storage provisions, fuel dispensing, tank vehicle loading provisions and fire protection for the proposed stored Dangerous Goods be clarified and in accordance with Australian Standard AS 1940 2004.
  - (a) FRNSW acknowledges that the proponent has undertaken a review of the proposed storage arrangement of Dangerous Goods at the site as detailed above (see FRNSW item number 1). The initial review of the site plan is positive however a full assessment of the FSS is required to be undertaken by FRNSW, pending any specific approval requirements being imposed on the development proposal by the Department.
- 2. FRNSW considers the proposed increase in materials to be stored and processed at the facility to represent a realistic possibility for a high fire load and fire hazard with the potential for problematic firefighting operations. Such an incident at the facility would require significant resource commitment by FRNSW in order to ensure safe resolution of the fire incident.

The EIS and PHA do not provide any details or commitments to the installation of a fire hydrant system at the site in order to assist FRNSW in undertaking its statutory duty for the extinguishment of fires and protecting life and property, in case of fire at the facility.

In the event of the development proposal being approved, and due to the potential high fire load nature of the development, FRNSW recommends that any conditions of consent include a requirement that the development comply with Clause E1.10 of the National Construction Code. In particular, the fire hydrant system's performance, with respect to minimum flow rates, should be specifically addressed. With the exception that the proposed shed and awning being appropriately sprinkler protected, FRNSW would not consider Table 2.1 of AS 2419.1 – 2005 to be an appropriate methodology to determine the fire hydrant system's minimum flow rates.

(b) Given the information provided within Figure 7 of the RTS, the proponent has clearly indicated that the proposed shed and awning will be appropriately sprinkler protected, which is supported by FRNSW.

However, FRNSW has also reviewed the basic details provided within Figure 7 which relate to the fire hydrant system and do not support the locations indicated on the drawing for both the hydrant booster assembly and attack fire hydrants. Details relating to the sprinkler booster assembly, or any associated dedicated firewater storage tanks have not been provided in Figure 7 of the RTS.

Additionally, as detailed within Hazardous Industry Planning Advisory Paper Number 2 (HIPAP No.2), a crucial part of the FSS is ensuring that the hydraulic design is sufficiently satisfactory to cope with the hazards and consequences. However in an initial overview of the FSS (not a full assessment), critical information relating to fire water supply, identified worst case fire scenario firewater requirements, contaminated firewater containment quantities/site capabilities and detailed fire services drawings are yet to be provided within the study (See sections 10, 11 and 12). The FSS must be complete prior to FRNSW undertaking an assessment and subsequently providing its determination.

FRNSW acknowledges the difficulties that exist for the site relating to access from Hearne Street and the existing location of the electrical substation kiosk, however the proposed hydrant system locations as currently detailed remains problematic for FRNSW in relation to operational firefighting and Workplace Health and Safety.

Based on the above information, FRNSW does not consider that the proposed fire hydrant system meets the requirements of FRNSW or Clause E1.10 of the National Construction Code. Of particular concern is the current lack of information relating to the firewater supply which would be required to maintain the concurrent operation of both the fire hydrant and sprinkler systems in the event of a worse case fire scenario at the proposed development site.

3. As detailed above (see FRNSW item number 2), the nature of this particular development will require FRNSW personnel to pro-actively manage an incident of fire and the subsequent containment of polluted fire water runoff during/after the incident.

FRNSW recommends that the site's surface and storm water management systems be designed to provide FRNSW with an ability to contain contaminated fire water runoff. The design of the systems capacities is recommended to take into account the possibility of the concurrent operation of a sprinkler system (if incorporated) and fire hydrant system to extinguish a worst case fire scenario at the facility.

(c) As detailed within HIPAP No.2, a crucial part of the FSS is ensuring that the hydraulic design is sufficiently satisfactory to cope with the hazards and consequences. However in an initial overview of the FSS (not a full assessment), critical information relating to fire water supply, identified worst case fire scenario firewater requirements, contaminated firewater containment quantities/site capabilities and detailed fire services drawings are not yet provided within the submitted FSS. The FSS must be complete prior to FRNSW undertaking an assessment and subsequently providing its determination.

Based on the above information, FRNSW does not consider that the information provided within the RTS, stormwater detailed drawings and/or the existing FSS contain the required calculations or information to permit

FRNSW to undertake an accurate assessment of the site's containment capacities.

4. In the event of development consent being granted, it is FRNSW recommendation that a Fire Safety Study (FSS) is developed and that the FSS is undertaken in accordance with the recommendations detailed in Hazardous Industry Planning Advisory Paper No.2.

It is also recommended that the FSS be approved by FRNSW to ensure its operational requirements are met.

(d) The information provided within the RTS and various other documents contained within the submission, including the FSS and SEPP 33 – Preliminary Risk Screening & Hazard Assessment prepared by SLR Consulting, dated 12 April 2016 (Appendix L) have been taken into consideration, however FRNSW is not satisfied that our operational requirements have been met.

As detailed within the SEPP 33 – Preliminary Risk Screening & Hazard Assessment, FRNSW acknowledges that the proposed development would not be classified as a potentially hazardous or offensive industry based on the requirements of SEPP 33 and therefore would likely not require a FSS to be assessed and/or approved by FRNSW.

However, as a number of concerns relating to fire safety and/or firefighting operations associated with the development proposal remain unresolved or not to the satisfaction of FRNSW. Therefore, our preferred position remains in-line with the original recommendation as detailed above (see FRNSW item number 4).

As a result of the above information, FRNSW provides the following recommendations for the Department to consider.

## **Recommendations:**

1. In the event that development consent is granted on the proposed Facility (SSD 7421) and a specific consent condition requiring the proponent to submit a FSS to FRNSW for approval is imposed by the Department, it is recommended that the proponent request a consultation meeting with FRNSW, prior to undertaking a review of the existing FSS and lodging a revised FSS for assessment.

# Or alternatively,

2. In the event that a specific consent condition requiring the proponent to submit a FSS to FRNSW for approval **is not imposed** by the Department, it is recommended that consultation be undertaken, requiring the proponent to obtain FRNSW satisfaction in relation to the hydraulic fire systems, the associated firewater supply and provisions for the containment of contaminated firewater for the proposed Facility (SSD 7421).

#### **Unclassified**

NOTE: Application forms for both an 'Informal Consultation' and 'FRNSW Report (other)' can be located at the FRNSW website, which is <a href="www.fire.nsw.gov.au">www.fire.nsw.gov.au</a>.

For further information please contact Cameron Wheatley of the Fire Safety Assessment Unit, referencing FRNSW file number BFS17/58 (12573). Please ensure that all correspondence in relation to this matter is submitted electronically to <a href="mailto:firesafety@fire.nsw.gov.au">firesafety@fire.nsw.gov.au</a>.

Yours sincerely

Station Officer Mark Castelli

Team Leader

Fire Safety Assessment Unit