

Mrs Joanna Bakopanos
Team Leader, Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

13 June 2016

Dear Mrs Bakopanos

Attention: Evelyn Craigie

Goodman Property Services (Aust) Pty Ltd, SSD 16 7491
Proposed Dangerous Goods Facility (Warehouse 3B) Lot 3, Oakdale Central, Horsely Park

This letter supersedes our letter sent 10 June 2016.

SafeWork NSW reviewed the Major Hazard Facilities (MHF) related sections of the EIS and PHA for the above project and our comments are set out below.

- 1) Although the proposed facility will be a Major Hazard Facility under the relevant clauses of the Work Health & Safety (WHS) Regulation, SafeWork NSW has no record of a request to provide SEARS. However, the applicant met with members of the MHF Team on 17 March 2016, when they informed us that the EIS/PHA was almost ready to be lodged with the Department. Therefore since the EIS & PHA were unlikely to refer to the Work Health & Safety (WHS) legislation, the applicant was given an outline of the MHF process under WHS and what needed to be done to comply with the legislation. The WHS legislation requires that an MHF must prepare and submit a Safety Case together with an application for an MHF licence and that the Safety Case must demonstrate that both on site and off site risks have been reduced to So Far As is Reasonably Practicable (SFARP).
- 2) Specific issues identified in the EIS/PHA are:
 - a. Inconsistencies in the quantity of LPG. EIS Table 4 shows 1984 tonnes, EIS section 6.3 shows 1000 tonnes and PHA table 3.1 shows 1000 tonnes.
 - b. Inconsistencies in the quantity of Class 3 (flammables). EIS table 4 shows 1824 m³ EIS section 6.3 shows 365 m³ and PHA table 3.1 shows 365 m³.
 - c. Section 4.3.1 of the PHA refers to explosions and concludes that there will be no significant off site impact based on the assumption that a gas leak is from a single aerosol can. The vapour cloud explosion or flash fire risk is dismissed on the basis that it is considered low (if not negligible). No justification has been provided for this conclusion. The scenario of leaks from multiple aerosol cans did happen at the Stiller aerosol storage facility in the UK resulting in an explosion that destroyed the entire building. This possibility has not been carried forward to consequence analysis and risk evaluation.
 - d. Section 4.1 states that toxic impacts are not considered on the basis that toxic materials are not planned for storage. Aerosols contain pesticides and insecticides which can produce toxic products of combustion in the event of a fire. The fire scenario has considered radiation but not considered the toxic products of combustion. The Diversey chemicals (in the Fairfield LGA) fire in the 1980s or 90s

affected residents several km away due to atmospheric inversions. Such possibilities need to be considered.

- 3) In order to ensure that adequate safety measures are identified in the Safety Case and included in the design, SafeWork NSW recommends that the risk assessment and risk controls should be carried out prior to finalising the detailed design of the control measures.

Should the Department determine to approve the modification, there are no issues from a SafeWork NSW point of view that would preclude approval, provided the following conditions are included in the consent.

Recommended conditions

1. Prior to finalising the detailed design of the safety related controls, the applicant must carry out an assessment of both on site and off site risks, particularly with regard to potential major incidents. The assessment should be developed in consultation with the Major Hazard Facilities team at SafeWork NSW and in accordance with Chapter 9 of the WHS Regulation 2011. The risk assessment must take into account, but not be limited to, explosions, toxic products of combustion and their behaviour during atmospheric inversions in the event of a fire.
2. Prior to finalising detailed design, the applicant must consult with the Major Hazard Facilities Team of SafeWork NSW with regard to the safety systems to be incorporated into the design to ensure that the risks have been reduced So Far As is Reasonably Practicable to comply with the WHS legislation.

Should you have any queries, please contact me on e mail sohan.fernando@safework.nsw.gov.au or telephone 88672747.

Yours sincerely,



Sohan Fernando
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Major Hazard Facilities Team
SafeWork NSW