10 June 2016
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Reference: 200266

Richard Seddon

Level 17, 60 Castlereagh St

Sydney NSW 2000

Attn: Mr Richard Seddon

Re: Toyota SEPP33

Dear Richard,

Many thanks for your inquiry regarding the application of State Environmental Planning Policy No.33 (Hazardous and Offensive Developments) to the proposed Toyota Warehouse at the Oakdale Industrial Estate. 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 is fairly self-explanatory, however should you have any queries regarding the assessment, please do not hesitate to contact me on my mobile (0438 749 181).

Yours faithfully,

CORE Engineering

Renton Parker
Risk Engineer
BEng (Chem. Hons)
MIEAust CPEng, VPAIDGC

TOYOTA WAREHOUSE
OAKDALE INDUSTRIAL ESTATE
STATE ENVIRONMENTAL PLANNING POLICY NO.33 ASSESSMENT

1 INTRODUCTION

1.1 BACKGROUND

Toyota has proposed to develop a Warehouse within the Oakdale Industrial Estate (OIE), NSW. The warehouse will comprise a warehouse which will contains several products classified as Dangerous goods (DGs). As DGs are stored, it will be a requirement of the Development Application to assess the applicability of the State Environmental Planning Policy No. 33 (SEPP33).

To assist with the preparation of a SEPP33 assessment, Goodman, on behalf of Toyota, 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 represents CORE's assessment of Warehouse and the application of SEPP33.

1.2 OBJECTIVES

The objective of the study is to identify whether SEPP33 applies to the proposed Toyota warehouse located within the OIE.

1.3 SCOPE OF WORK

The scope of work is for a SEPP33 assessment of the proposed Toyota Warehouse storage at located within the OIE. 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 within the warehouse 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 Goodman;
- A final report was then completed incorporating changes for points of fact in the draft report.

3 DANGEROUS GOODS STORED

The warehouse 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); and
- Batteries – Class 8, Packaging Group(PG) III (1,500 kg or 1.5 tonnes),

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).

4 SEPP33 ASSESSMENT (PRELIMINARY RISK SCREENING)

4.1 SEPP33 GUIDELINES

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 SEPP33 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.

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 (Ref.1, Page 17):

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.*

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.

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 STORE	CLASS/PG	QTY STORED	SEPP33 THRESHOLD	REFERENCE
Batteries – corrosives	8/III	1.5 tonnes	50 tonnes	Appendix A

Based on the results displayed in **Table 4-1**, it can be seen that the threshold for corrosive substances is not exceeded.

5 CONCLUSIONS

Based on the analysis conducted in this SEPP33 study for the proposed Toyota Warehouse at the OIE, 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 Toyota Warehouse located within the OIE, 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

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[1])	
	10 tonne or16 m^3	if stored above ground
	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.*