

24 August 2017

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Re: Mayfield West Recycling Facility SSD 7698 - Fire & Rescue NSW submission

Dear Kate,

We have reviewed Fire & Rescue NSW's (FRNSW) letter of 4 August 2017 regarding the Mayfield West Recycling Facility.

This letter responds to the FRNSW letter and provides:

- further responses to the matters raised by FRNSW; and
- comments on the conditions proposed by FRNSW.

1 FRNSW comments

The FRNSW letter appears to express the agencies general concerns about recycling facilities and does not appear to provide specific comments about the Mayfield West Recycling Facility.

There are a many recycling facilities in NSW handling a range of different wastes. The fire risk depends on a range of factors including the types of materials accepted, the volumes of materials stockpiled, the layout of the site and application of management measures. The majority of material accepted by the Mayfield West Recycling Facility is non-flammable excavated material and there are large external open areas to form segregated timber stockpiles and an open shed for stockpiling co-mingled light waste (which includes plastics and paper). On this basis, the fire risk at the Mayfield West Recycling Facility site is considered to be lower than at many recycling facilities.

FRNSW state that they "do not believe that the RtS has adequately addressed the six points [below] or the concerns expressed in [the FRNSW] letter dated 16 March 2017." The matters raised in the 16 March 2017 letter are addressed in RTS Table 4.1 Items H.1 to H.5. FRNSW do not explain how the responses provided are inadequate. Responses to the six items in FRNSW's 4 August 2017 letter are provided below.

1. Inappropriate stockpile sizes (i.e. pile area, height and total volume).

Information on individual stockpile volumes and heights is provided in EIS Table 2.2. The maximum total volume of flammable material stockpiled on site is provided in RTS Table 4.1, Item H.2. We would welcome FRNSW's views on appropriate maximum stockpile sizes.

2. Insufficient separation of stockpiles (which hinders first responder vehicle access and increases the likelihood of fire expansion).

Stockpiles containing flammable materials will be separated to allow access for fire fighting. We would welcome FRNSW's views on minimum separation distances.

3. The capacity of the fire hydrant system and its water supply is insufficient for the fire load kept on site.

It is unclear how FRNSW reach this conclusion. Should FRNSW have information on the capacity of the water supply, we request that this is provided.

4. Buildings are often not served by a sprinkler system.

This appears to be a generic comment regarding facilities in general.

With the exception of timber, flammable waste will be stored in the main processing building. The building is about 14 m tall. It is unclear whether sprinklers installed in the roof would be effective. The building is served by hydrants specifically designed for the activities in the building (see RTS Appendix A), noting that it is not proposed to change the total volume of material on site at any one time.

5. Buildings not usually provided with smoke hazard management systems that facilitate safe firefighting operations.

This appears to be a generic comment regarding facilities in general. It does not appear to take into account that the main processing shed is large, open-sided and has a vented roof (see EIS Photograph 2.3).

6. On-site provisions to contain contaminated fire water runoff are not usually in place.

This is addressed in RTS Table 4.1, Item H.4.

2 FRNSW recommended condition

As stated above, we do not agree with much of the basis for FRNSW's conclusions regarding the Mayfield West Recycling Facility. However, we also understand that DPE need to take advice from NSW's lead agencies on specific issues. On this basis, the recommended condition is acceptable with the following exceptions:

- a) That Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) be complied with to the satisfaction of FRNSW.

This would make FRNSW the de facto approval authority. We believe that these matters need to be addressed to the satisfaction of the Secretary of DPE. This accords with discussions with DPE regarding other projects.

- v) If deemed necessary, by virtue of applying Clauses E1.10 and E2.3 to the development, that any significant building used to process recyclable material is provided with an appropriate automatic fire suppression system.

We believe that specification of an "appropriate automatic fire suppression system" presupposes the outcomes of the application of Clauses E1.10 and E2.3 which may be achieved in a number of ways that may not require an automatic fire suppression system. It is requested that "automatic" is therefore removed from this condition.

3 Closing

We trust the information provided above is of assistance and we look forward to working with DPE to resolve any residual issues.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'PT' followed by a long horizontal flourish.

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