



SEPP 33 Assessment

Skyline Crescent, Horningsea Park NSW

DHL Supply Chain (Australia) Pty Limited
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Skyline Crescent, Horningsea Park NSW

DHL Supply Chain (Australia) Pty Limited

Prepared by

Riskcon Engineering Pty Ltd

Unit 618/159 Ross Street

Forest Lodge, NSW 2037

www.riskcon-eng.com

ABN 74 626 753 820

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A	8 th February 2021	Draft issued for comment	Sarah Torrington	Renton Parker
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Executive Summary

Background

DHL Supply Chain (Australia) Pty Limited (DHL) have entered into a lease agreement for a warehouse at Skyline Crescent, Horningsea Park NSW. Their operations require the storage and handling of Dangerous Goods (DGs); specifically, Class 2.2 non-toxic non-flammable gases (some with subrisk 5.1), Class 3 flammable liquids, Class 8 corrosive substances and Class 9 miscellaneous substances. As DGs are being stored, the site is subject to the State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33, Ref. [1]). Prime Constructions Pty Ltd (Prime), on behalf of DHL, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to review the proposed storage and to prepare a SEPP 33 assessment for submission with the development application (DA).

This document provides Riskcon's assessment of the applicability of SEPP 33 to the proposed DHL site at Skyline Crescent, Horningsea Park NSW.

Conclusions

The proposed DHL site at Skyline Crescent, Horningsea park NSW has been assessed for the application of the State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) based on the proposed storage of DGs at the facility. The NSW Department of Planning and Environment (DPE) has published a guideline to assist regulators in determining the application of SEPP 33, which contains threshold levels of DGs above which SEPP 33 would apply.

The analysis conducted in this study has identified that the proposed quantities of DGs to be stored at the DHL site do not exceed any SEPP 33 thresholds. Further, the transport of DGs does not exceed the threshold levels published in Applying SEPP 33, nor do any offensive operations occur at the site which may result in environmental emissions. Therefore, it is concluded that the SEPP 33 policy does not apply to this site.

Recommendations

The following recommendations have been made:

- DHL shall re-assess their site against SEPP 33 in the event that storage quantities of DGs increase.
- Documentation required by the Work Health and Safety Regulation 2017 (Ref. [3]) specific to the site classification based upon the quantity of goods stored shall be prepared for the site prior to occupation.

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Abbreviations

Abbreviation	Description
CBD	Central Business District
DA	Development Application
DGs	Dangerous Goods
EPA	Environmental Protection Agency
RDC	Retail Distribution Centre

1.0 Introduction

1.1 Background

DHL Supply Chain (Australia) Pty Limited (DHL) have entered into a lease agreement for a warehouse at Skyline Crescent, Horningsea Park NSW. Their operations require the storage and handling of Dangerous Goods (DGs); specifically, Class 2.2 non-toxic non-flammable gases (some with subrisk 5.1), Class 3 flammable liquids, Class 8 corrosive substances and Class 9 miscellaneous substances. As DGs are being stored, the site is subject to the State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33, Ref. [1]). Prime Constructions Pty Ltd (Prime), on behalf of DHL, has commissioned Riskcon Engineering Pty Ltd (Riskcon) to review the proposed storage and to prepare a SEPP 33 assessment for submission with the development application (DA).

This document provides Riskcon's assessment of the applicability of SEPP 33 to the proposed DHL site at Skyline Crescent, Horningsea Park NSW.

1.2 Objectives

The objectives of the study are to:

- Determine whether SEPP 33 applies to the proposed DHL site at Skyline Crescent, Horningsea Park NSW based on the quantity of DGs being stored; and
- Report on the findings of the study in support of the DA.

1.3 Scope of Work

The scope of work is for a SEPP 33 assessment of the quantities of DGs proposed for storage within the DHL distribution centre being developed at Skyline Crescent, Horningsea Park NSW to determine whether the SEPP 33 policy applies to the site. Additionally, a review of the quantity of vehicle movements as a result of the DGs being stored will be assessed to determine whether additional traffic assessment is required. The scope does not include any other sites, nor the preparation of any other planning studies should they be required.

2.0 Methodology

2.1 General Methodology

The methodology used in this study is that which is recommended in Applying SEPP 33 – Hazardous and Offensive Developments (Applying SEPP 33, Ref. [2]). The methodology used is summarised below:

- A review of the proposed types and quantities of DGs to be stored at the site was conducted.
- The quantities of DGs were compared to the threshold quantities listed in Applying SEPP 33 to determine whether the storage triggers the SEPP 33 policy.
- Vehicular movements as a result of DGs being stored were reviewed and compared against the applicable thresholds detailed in Applying SEPP 33.
- The findings of the SEPP 33 assessment were documented within this report.

3.0 Site Description

3.1 Site Location and Layout

The DHL site is located at Skyline Crescent Horningsea Park, approximately 35 km south west of the Sydney Central Business District (CBD). **Figure 3-1** shows the regional location of the site in relation to the Sydney CBD. Provided in **Figure 3-2** is the proposed layout of the warehouse within the site, with the DG storage areas marked on the image.

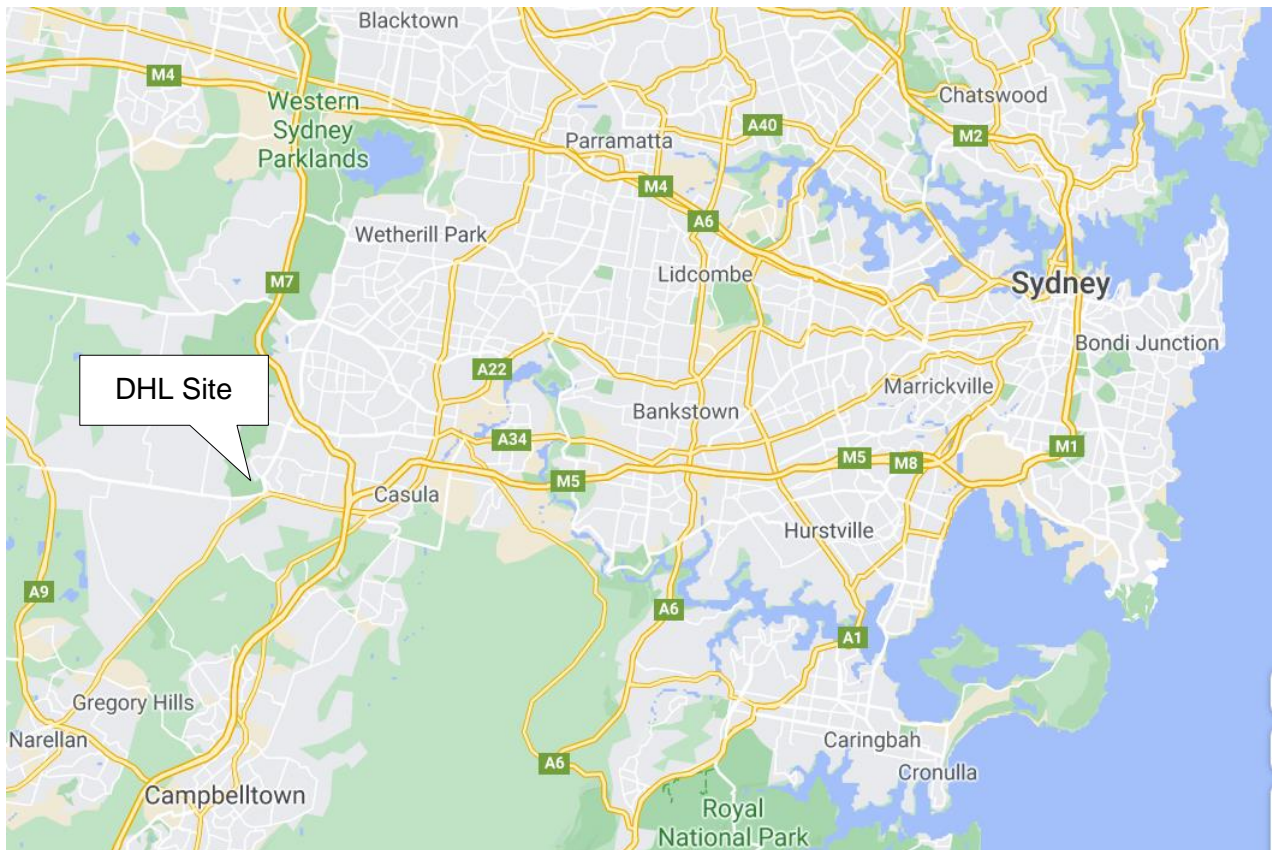


Figure 3-1: DHL Site Location

3.2 General Description

The DHL warehouse operates as a retail distribution centre. Packages are unloaded from trucks and stored at the site on racking until they are required to be dispatched to a client. The site stores non-DG and DG packages, which are kept in separate storage areas.

The warehouse contains an office, two loading docks, and internal warehouse storage area. The facility will operate as a Retail Distribution Centre (RDC) meaning the packages stored and handled at the site are all small retail sized packages. The DG storages will comply with the RDC section of AS/NZS 3833:2007 (Ref. [2]).

3.3 Quantities of Dangerous Goods Stored and Handled

A combination of different classes and packing groups of DGs are proposed to be stored at the site. These are all small (retail) package sizes and are a combination of solids and liquids. The Class 8 and 9 DGs are batteries which form part of a larger packaged good (i.e. the battery quantity

within the package is only a minor quantity). A breakdown of the DGs proposed to be stored at the site is provided in **Table 3-1**.

Table 3-1: Quantities of DGs Stored and Handled

Class	PG	Description	Quantity (L or kg)
2.2	n/a	Non-flammable, non-toxic gas	399
2.2 (5.1)	n/a	Non-flammable, non-toxic gases with oxidising sub-risk	80
3	II	Flammable liquids	2,605
8	II	Corrosive substances (primarily in batteries)	173
9	III	Miscellaneous DGs	4,695

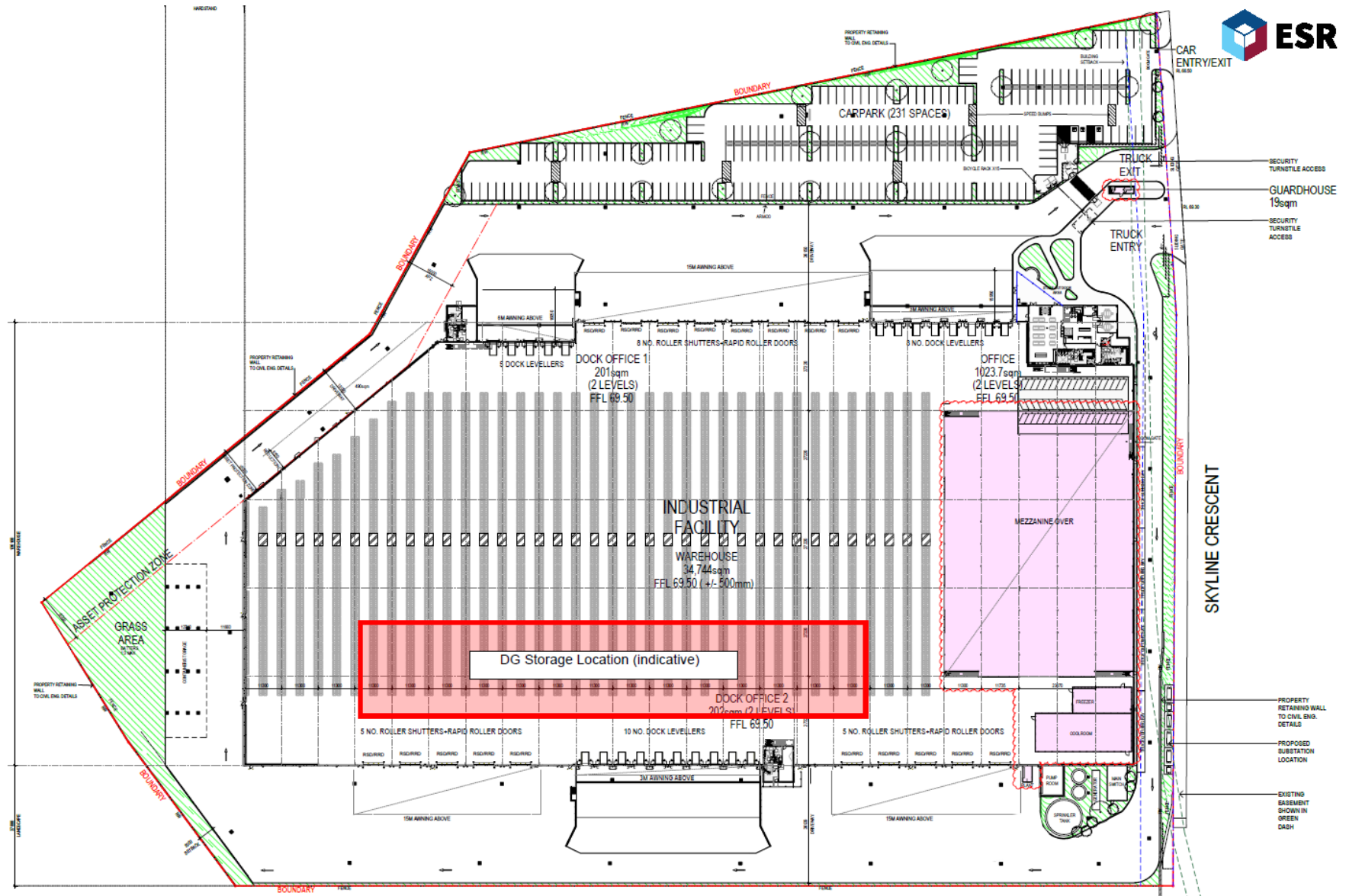


Figure 3-2: Proposed Warehouse Layout

4.0 SEPP 33 Assessment

4.1 DG Storage SEPP 33 Application

The proposed DHL site will store Class 2.2, Class 2.2 (5.1), Class 3, Class 8 and Class 9 substances. Of these, only the Class 2.2 (5.1), Class 3 and Class 8 substances are assessable against SEPP 33. **Table 4-1** lists the quantities of DGs to be stored and an assessment against their SEPP 33 thresholds.

The assessment demonstrates that no storage quantity exceeds the SEPP 33 threshold and therefore, the site is not regarded as being potentially hazardous and the SEPP 33 policy does not apply.

Table 4-1: SEPP 33 Assessment of DG Storage Quantities

Class	PG	Qty Stored (L or kg)	SEPP 33 Qty (kg)	SEPP 33 Assessment
2.2 (5.1)	n/a	80	5,000	Not potentially hazardous
3	II	2,605	5,000	Not potentially hazardous
8	II	173	25,000	Not potentially hazardous

4.2 DG Transport Assessment

In addition to the storage of DGs, SEPP 33 also requires a review of the transport of DGs to the site. **Table 4-2**, extracted from Applying SEPP 33 (Ref. [1]), lists the threshold levels for transport of each class of DG.

Table 4-2: Transportation Screening Thresholds, Extracted from Applying SEPP 33 (Ref. [1])

Class	Vehicle Movements		Minimum Quantity per Load (tonnes)*
	Cumulative Annual	Peak Weekly	
2.2 (5.1)	>500	>30	5
3PGII	>750	>45	10
8	>500	>30	5

*All loads will be transported as packages, not as bulk transport.

The DHL site does not exceed these transport limits due to the low quantities of DGs within each package. Hence, the traffic movements and quantities transported to and from the site do not exceed the thresholds listed in Applying SEPP 33 (Ref. [1]) and the site is considered to be low risk.

4.3 Offensive Operations Assessment

Applying SEPP 33 (Ref. [1]) also contains a requirement for review of operations that may cause offense in the form of emissions, odour or other environmental impact. An indication of whether “offensiveness” may occur at the facility is whether an Environmental Protection Authority (EPA) licence is required for specific operations at the site. A review of the DHL site operations indicates that there are no processes that would result in the manufacture, production or transfer of materials in a form that may result in the release of bulk materials at the site. Hence, an EPA licence would not be required for this site.

The total quantity of chemicals stored at the DHL warehouse is 8,416 kg (approx. 8 kL). The Protection of Environmental Operations Act and Regulations (Ref. [2]) indicates that chemical storage facilities that exceed 5,000 kL would trigger an administrative fee unit. As there is only 8 kL of chemicals stored, an administrative fee unit is not triggered, and a licence is not required for the site.

Further, as noted above, there would be no unusual operations that would cause potential emissions, odours, or noise outside of normal warehouse type operations. Therefore, there is no potential for offensive operations at the site and SEPP 33 does not apply.

5.0 Conclusions and Recommendations

5.1 Conclusions

The proposed DHL site at Skyline Crescent, Horningsea park NSW has been assessed for the application of the State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) based on the proposed storage of DGs at the facility. The NSW Department of Planning and Environment (DPE) has published a guideline to assist regulators in determining the application of SEPP 33, which contains threshold levels of DGs above which SEPP 33 would apply.

The analysis conducted in this study has identified that the proposed quantities of DGs to be stored at the DHL site do not exceed any SEPP 33 thresholds. Further, the transport of DGs does not exceed the threshold levels published in Applying SEPP 33, nor do any offensive operations occur at the site which may result in environmental emissions. Therefore, it is concluded that the SEPP 33 policy does not apply to this site.

5.2 Recommendations

The following recommendations have been made:

- DHL shall re-assess their site against SEPP 33 in the event that storage quantities of DGs increase.
- Documentation required by the Work Health and Safety Regulation 2017 (Ref. [3]) specific to the site classification based upon the quantity of goods stored shall be prepared for the site prior to occupation.

6.0 References

- [1] NSW Department of Planning and Environment, "Applying SEPP33 – Hazardous and Offensive Developments," NSW Department of Planning and Environment, Sydney, 2011.
- [2] SafeWork NSW, "Work Health and Safety Regulation," SafeWork NSW, Lisarow, 2017.
- [3] Standards Australia, "AS/NZS 3833:2007 - Storage and Handling of Mixed Classes of Dangerous Goods, in Packages and Intermediate Bulk Containers," Standards Australia, Sydney, 2007.
- [4] NSW Government, "Protection of the Environment Operations Act," NSW Legislation, Canberra, Australia, 1997.