RiskCon Engineering

State Environmental Planning Policy No. 33

Lot 8 Skyline Crescent Horningsea Park

Steel Force
Document No. RCE-18056_SteelForce_FinalSEPP33_20Dec18_Rev(0)
Date 20/12/2018

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Rev	Date	Remarks	Prepared By	Reviewed By
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0	20 December 2018	Issued final		

Executive Summary

Introduction

Steelfore Pty Ltd (Steelforce) has proposed to lease a warehouse within the Bringelly Road Business Hub. As Part of the Secretary Environmental Assessment Requirements (SEARS) a State Environmental Planning Policy No. 33 (SEPP 33) report is required for the facility as it will store materials classified as Dangerous Goods (DGs). If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Commercial & Industrial Property (CIP) and Charter Hall, on behalf of Steelforce, has engaged RiskCon Engineering Pty Ltd to prepare the SEPP 33 for the site.

Conclusions

A review of the quantities of DGs stored at the proposed Steelforce warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facilty as SEPP 33 does not apply.

Recommendations

No recommendations have been made for the site

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1.0 Introduction

1.1 Background

Steelfore Pty Ltd (Steelforce) has proposed to lease a warehouse within the Bringelly Road Business Hub. As Part of the Secretary Environmental Assessment Requirements (SEARS) a State Environmental Planning Policy No. 33 (SEPP 33) report is required for the facility as it will store materials classified as Dangerous Goods (DGs). If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Commercial & Industrial Property (CIP) and Charter Hall, on behalf of Steelforce, has engaged RiskCon Engineering Pty Ltd to prepare the SEPP 33 for the site.

1.2 Scope of Work

The scope of work is to prepare the SEPP 33 assessment for the Steelforce warehouse located within the Bringelly Business Park. Should any additional studies be required (i.e. PHA) these are not included within the scope of works. No other sites are included within the scope of works.

2.0 Methodology

2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs the threshold quantities listed in "Applying SEPP 33 – Hazardous and Offensive Development" (Ref. [1]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements involving DGs and compare against the applicable thresholds detailed in Applying SEPP 33 (Ref. [1]).
- Report on the findings of the SEPP 33 assessment.

2.2 Data taken from "Applying SEPP 33"

Figure 2-1, extracted from "Applying SEPP 33" provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold.

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
LPG (underground)	table 3
2.3	table 3
3PGI	Figure 8 graph if greater than 2 tonne
3PGII	Figure 9 graph if greater than 5 tonne
3PGIII	Figure 9 graph if greater than 5 tonne
4	table 3
5	table 3
6	table 3
7	table 3
8	table 3

Figure 2-1: Screening Method to be Used

Table 3 from "Applying SEPP 33" has been extracted and is shown in **Figure 2-2**.

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')	
	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

Note: *The classes used are those referred to in the Australian Dangerous Goods Code and are explained in Appendix 7.*

Figure 2-2: General Screening Threshold Quantities

Transportation screen thresholds have been provided in **Figure 2-3**.

Class	Vehicle Movements: Cumulative Annual	*or*	Vehicle Movements: Peak Weekly	Minimum quantity* per load (tonne): Bulk	Minimum quantity* per load (tonne): Packages
1	see note		see note	see note	
2.1	>500		>30	2	5
2.3	>100		>6	1	2
3PGI	>500		>30	1	1
3PGII	>750		>45	3	10
3PGIII	>1000		>60	10	no limit
4.1	>200		>12	1	2
4.2	>100		>3	2	5
4.3	>200		>12	5	10
5	>500		>30	2	5
6.1	all		all	1	3
6.2	see note		see note	see note	
7	see note		see note	see note	
8	>500		>30	2	5
9	>1000		>60	no limit	

Figure 2-3: Transportation Screening Thresholds

3.0 SEPP 33 Review

3.1 Proposed Storage Details

Provided in **Table 3-1** is a summary of the DGs and materials proposed to be stored at the facility as part of the site operations.

Table 3-1: DG Classes or Materials Stored and Maximum Quantities

Class	Description	PG	Quantity (kg)
2.1	Liquefied Petroleum Gas (LPG)	n/a	18
2.1	Aerosols	n/a	12.5*
2.1	Acetylene	n/a	16.8
2.2	Agroshield	n/a	29
2.2(5.1)	Oxygen	n/a	23.4
C2	Lubricating oils	n/a	20

*Assumed LPG is 25% of product weight

3.1.1 Classification of Stored Products

The Australian Dangerous Goods Code (ADG, Ref. [2]) provides a list of materials which are classified as DGs under the requirements of the code. The goods to be stored are classified as DGs by the ADG. Therefore, the materials classified as DGs are subject to the assessment requirements of SEPP 33. Combustible liquids and Class 2.2 gases are not subject to SEPP 33; hence, the lubricating oils and agroshield have been removed from further assessment. Oxygen has a subrisk Class 5.1; hence, this component is still assessed.

3.2 Application of State Environmental Planning Policy No.33 – Hazardous and Offensive Developments

State Environmental Planning Policy No. 33 – Hazadous and Offensive Developments (SEPP 33) has been developed under the Planning and Assesment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a faclity to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning and Environment in the conditions of consent.

3.2.1 Storage

Threshold limits for the application of SEPP 33 are presented in **Table 3-2** along with maximum DG quantities that will be stored. The results summarised in the table indicates the SEPP 33 criteria is not exceeded; hence, no further assessment would be required.

Table 3-2: Quantities Stored and SEPP 33 Threshold

Class	Description	PG	Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	LPG	n/a	18	10,000	No
2.1	Aerosols	n/a	12.5*	10,000	No
2.1	Acetylene	n/a	16.8	10,000	No
5.1	Oxygen	n/a	23.4	5,000	No

3.2.2 Transport

The quantities to be stored are less than SEPP 33; hence, a high turnover of stored product would be required to exceed the transport movements associated with this storage. This rate of turnover isn't credible; hence, it is considered that the transport screening thresholds shown in **Figure 2-3** would not be exceeded; hence, SEPP 33 would not apply.

The transport limits for each class stored at the site would not exceed SEPP 33; hence, no further analysis is required based on transport movements.

4.0 Conclusion and Recommendations

4.1 Conclusions

A review of the quantities of DGs stored at the proposed Steelforce warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facilty as SEPP 33 does not apply.

4.2 Recommendations

No recommendations have been made for the site

5.0 References

[1] Department of Planning, “Applying SEPP 33,” Department of Planning, Sydney, 2011.

[2] National Transport Commission (NTC), “Australian Code for the Transport of Dangerous Goods by Road & Rail, 7th Edition,” 2011.