Appendix P: Revised SEPP 33 Assessment Report

HAZKEM
DANGEROUS GOODS CONSULTING

SEPP 33

RISK SCREENING DOCUMENTATION

Proposed Expansion works at:

BRS Resource Recovery Facility
16 Kerr Road
INGLEBURN NSW

Hazkem Pty Ltd
June 2020

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Name of Project	BRS Ingleburn
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RISK SCREENING and PRELIMINARY HAZARD ANALYSIS
BULK RECOVERY SOLUTIONS
16 Kerr Road
INGLEBURN NSW

PURPOSE AND SCOPE OF THIS DOCUMENT

For dangerous goods installation designs where there is proposed storage above minor quantities, an investigation process must be followed in order to assess whether or not a proposal is suitable for a particular site or not. Such sites should be deemed "potentially hazardous" until a detailed risk assessment determines otherwise. The process flow chart is detailed in appendix 1.

NSW State Environmental Planning Policy 33[1], (SEPP 33) is a document published by the NSW Department of Planning which provides guidelines for local government and developers for ensuring that the safety and pollution impacts of an industrial proposal are addressed at an early stage of the development application process. Through this document an assessment procedure is followed which links the permissibility of a proposal to its safety performance. SEPP 33 ensures that only those industrial proposals which are suitably located, and able to demonstrate that they can be built and operated with an adequate level of safety, can proceed[2].

As detailed in SEPP 33 a "*hazardous industry*" is one which poses a significant risk when all locational, technical, operational and organizational safeguards are included.

A "*potentially hazardous industry*" is one which, when all safeguards are operating, imposes a risk level which is significantly lower.

SEPP 33 also incorporates a screening process which will determine whether or not a site is potentially hazardous. If deemed potentially hazardous, a preliminary hazard analysis is required.

Certain activities may involve handling, storing or processing a range of substances which in the absence of locational, technical or operational controls may create an off-site risk or offence to people, property or the environment. Such activities would be defined as potentially hazardous or potentially offensive. SEPP 33 also provides guidelines to assist councils and proponents to establish whether a development proposal would fit into such definitions and hence, come under the provisions of the policy.

The purpose of a PHA is to gain a better understanding of the risks and hazards associated with the site and to provide a reasonable basis for an informed judgment to be made on the acceptability of the site for the proposed development[3]. The PHA will outline in detail possible risks and hazards associated with this site. This will assist council in reaching an informed decision for the proposal.

It is important to note also that this investigation has been carried out by a suitably qualified person who understands the properties of the dangerous goods stored on site and the possible impact they may have on equipment and structures located on and off site. Under state legislation a system must be designed by a suitably qualified person who is experienced in this type of work[4].

REFERENCE AND ASSISTANCE DOCUMENTS

This document has been compiled with guidance from:

- Hazardous Industry Planning Advisory Paper No 4 'Risk Criteria for Land Use Safety Planning'
- Hazardous Industry Planning Advisory Paper No 6. 'Guidelines for Hazard Analysis"
- Hazardous and Offensive Development Application Guideline 'Applying SEPP 33'
- NSW Dept of Planning assessment guidelines "Multi Level Risk Assessment".

SITE DESCRIPTION

LOCATION

The site is an existing Industrial Recycling Facility located at 16 Kerr Road, Ingleburn. The site is located at the end of a dead end street on the North East side of the dead end roundabout. The site is located in an industrial estate with both sites to the north west and south defined as industrial. The site backs on to Henderson Road to the North and Railway to the East.

PROPOSAL

This site is an existing Industrial Recycling Facility with its use not proposed to change. The site proposes to expand their business load by increasing their operational hours and as a result increase their processing of materials. The site plans to expand the number of waste products accepted, increase the tonnes per annum (tpa) processed on site to 225,000 tpa and increase their stockpile of materials on site to 90,000 tonnes.

ON SITE MATERIALS

The site as an Industrial Recycling Facility will store and handle numerous materials with the proposed include:

Solid Waste Types

- Fly ash
- General solid waste non-putrescible
- Grit and screening from sewage treatment systems that have been dewatered so that the grit or screenings do not contain free liquids
- Building and demolition waste
- Foundry sand
- Basalt sand
- Reclaimed asphalt
- Excavated road material
- Recovered aggregate
- Recovered fines
- Recovered glass fines
- Soils contaminated with a substance or waste referred to in Part 1 or 2 of Schedule 1 of POEO (waste)

- Recovered railway ballast
- Slag
- Soils CT1 and CT2
- Plasterboard
- Construction and demolition waste
- General or specific exempted waste (RRE)
- Excavated natural material / virgin excavated natural material (ENM/VENM) (transfer only)

Liquid and Muddy Water Waste Types

- Drilling mud and / or muddy waters
- Non-destructive drilling mud (treated and untreated)
- Fire debris and fire wash water (no PFOS and PFAS)
- Sewage sludge and residues including debris and grit
- Asbestos contaminated water with gross pollutants
- Concrete washout water
- Cement slurry
- Waste oil / hydrocarbons
- Waste waters containing organic, inorganic, and emulsified substances
- Industrial waste water putrescible and non-putrescible
- Groundwater (including M250, J100, N160, N250, F100)
- Stormwater including contaminated with gross pollutants
- Waste water system grit and screenings from projects general solid waste (putrescible)
- Leachate
- Oily waters J120
- Asbestos containing drill mud and or waters from drilling operations and non-destructive digging
- Grit Screenings including gross pollutants and free liquid
- Containers and drums containing controlled waste, oil and kerosene (transfer only)
- Anionic Polymer
- Cationic Polymer
- Poly Aluminium Chloride
- Polydadmac Inorganic Coagulant
- Hydrated Lime
- Caustic Soda Liquid 60%
- Sulfuric Acid 40%
- Sodium Hypochlorite 50%
- Diesel

ASSESSING POTENTIALLY HAZARDOUS INDUSTRY - SEPP 33 RISK SCREENING

PRELIMINARY

The screening method set out in Applying SEPP 33 (Department of Planning, 2011) provides the first step in the analysis. The screening method is based on broad estimates of the possible off-site effects or consequences from hazardous materials present on site, taking into account locational characteristics.

If the quantity/distance is less than the screening threshold, then no further analysis is necessary. The safety management regime in this case relies on observance of the requirements of engineering codes and standards.

If the quantities/distances exceed the screening threshold, further analysis is necessary.

HAZARDOUS MATERIAL STORAGE

As defined within the Department of Plannings Applying SEPP 33 documentation the Risk Screening process is based on the notion of Hazardous Materials being present on site. As outlined within this document Hazardous Materials that are covered and to be assessed under the SEPP 33 documentation must be classified as a Dangerous Good by the Australian Code for the Transportation of Dangerous Goods by Road and Rail (Dangerous Goods Code)" (otherwise known as the ADG Code).

Below summarizes an itemised classification assessment of all of the proposed storages.

Solid Waste Types

- Fly ash
  Fly ash is a by product of coal combustion and is not defined as a Dangerous Good under the ADG Code
- General solid waste non-putrescible
  General solid waste categorises an assortment of items such as glass, plastics, plasterboard, paper, bricks, garden waste just to name a few. This category of items are not defined as Dangerous Goods under the ADG Code
- Grit and screening from sewage treatment systems that have been dewatered so that the grit or screenings do not contain free liquids
  Dewatered grit and screening from sewage treatment systems are not defined as Dangerous Goods under the ADG Code
- Building and demolition waste
  Building and demolition waste will be a mixture of steel, timber, concrete and similar. These items are not defined as Dangerous Goods under the ADG Code.
- Foundry sand
  Sand is an inert material. It is not defined as Dangerous Goods under the ADG Code
- Basalt sand
  Basalt sand is an inert material. It is not defined as Dangerous Goods under the ADG Code
- Reclaimed asphalt

Reclaimed asphalt is not defined as Dangerous Goods under the ADG Code

- Excavated road material
  Excavated Road Material is not defined as Dangerous Goods under the ADG Code
- Recovered aggregate
  Recovered aggregate is not defined as Dangerous Goods under the ADG Code
- Recovered fines
  Recovered Fines is not defined as Dangerous Goods under the ADG Code
- Recovered glass fines
  Recovered glass sand is not defined as Dangerous Goods under the ADG Code
- Soils contaminated with a substance or waste referred to in Part 1 or 2 of Schedule 1 of POEO (waste)
- Recovered railway ballast
  Recovered railway ballast is not defined as Dangerous Goods under the ADG Code
- Slag
  Slag is not defined as Dangerous Goods under the ADG Code
- Soils CT1 and CT2
  Soils with a CT1 and CT2 classification are contamination grades assigned to the soil. Soils (CT1 and CT2) are not defined as Dangerous Goods under the ADG Code
- Plasterboard
  Plasterboard is not defined as Dangerous Goods under the ADG Code.
- Construction and demolition waste
  Construction and demolition waste will be a mixture of steel, timber, concrete and similar. These items are not defined as Dangerous Goods under the ADG Code.
- General or specific exempted waste (RRE)
  General or specific exempted waste (RRE) are not defined as Dangerous Goods under the ADG Code
- Excavated natural material / virgin excavated natural material (ENM/VENM) (transfer only)
  Excavated natural material/virgin excavated natural material are not defined as Dangerous Goods under the ADG Code

Liquid and Muddy Water Waste Types

- Drilling mud and / or muddy waters
  Drilling mud as a byproduct of exploration type works is not defined as a Dangerous Good under the ADG Code
- Non-destructive drilling mud (treated and untreated)
  Digging Waste as a majority will be soil is an inert material and is not defined as a Dangerous Good under the ADG Code
- Fire debris and fire wash water (no PFOS and PFAS)
  Fire debris and fire wash water (no PFOS and PFAS) is not defined as a dangerous Good under the ADG Code. The debris and water will be required to undergo any number of treatments depending on the contaminates.

- Sewage sludge and residues including debris and grit
  Sewage sludge is not defined as Dangerous Goods under the ADG Code
- Asbestos contaminated water with gross pollutants
  Asbestos contaminated water with gross pollutants is not defined as Dangerous Goods under the ADG Code. Asbestos whilst a known carcinogen is not itself a Dangerous Goods
- Concrete washout water
  Concrete is an inert material and not defined as a Dangerous Good under the ADG code.
- Cement slurry
  Cement is an inert material and not defined as a Dangerous Good under the ADG code.
- Waste oil / hydrocarbons
  There is potential that some items within this category may be defined as class 3 flammable liquids under the Dangerous Goods under the ADG Code.
- Waste waters containing organic, inorganic, and emulsified substances
  Waste water is not defined as a dangerous Good under the ADG Code. The groundwater will be required to undergo any number of treatment depending on the contaminates.
- Industrial waste water putrescible and non-putrescible
  Industrial wastewater will contain numerous pollutants but is not defined as Dangerous Goods under the ADG Code
- Groundwater (including M250, J100, N160, N250, F100)
  Groundwater is not defined as a dangerous Good under the ADG Code. The groundwater will be required to undergo any number of treatment depending on the contaminates.
- Stormwater including contaminated with gross pollutants
  Contaminated Stormwater is not defined as a dangerous Good under the ADG Code. The stormwater will be required to undergo any number of treatment depending on the contaminates
- Waste water system grit and screenings from projects general solid waste (putrescible)
  Waste water system grit and screenings from projects general solid waste (putrescible)are not defined as Dangerous Goods under the ADG Code
- Leachate
  Leachate varies widely in composition due to its nature however it is not defined as Dangerous Goods under the ADG Code
- Oily waters J120
  Oily water will contain numerous pollutants but is not defined as Dangerous Goods under the ADG Code
- Asbestos containing drill mud and or waters from drilling operations and non-destructive digging
  Asbestos although a known carcinogen is not defined as Dangerous Goods under the ADG Code
- Grit Screenings including gross pollutants and free liquid
  Grit Screenings including gross pollutants and free liquid are not defined as Dangerous Goods under the ADG Code

There is potential that some items within this category may be defined as class 3 flammable liquids under the Dangerous Goods under the ADG Code.

- Anionic Polymer
  Anionic Polymer is used during the treatment process. Anionic Polymer not defined as a dangerous Good under the ADG Code.
- Cationic Polymer
  Cationic Polymer is used during the treatment process. Cationic Polymer not defined as a dangerous Good under the ADG Code.
- Polyaluminium Chloride
  Polyaluminium Chloride is used during the treatment process. Polyaluminium Chloride is not defined as a dangerous Good under the ADG Code.
- Polydadmac Inorganic Coagulant
  Polydadmac Inorganic Coagulant is used during the treatment process. Polydadmac Inorganic Coagulant not defined as a dangerous Good under the ADG Code.
- Hydrated Lime
  Hydrated Lime not defined as a dangerous Good under the ADG Code.
- Caustic Soda Liquid 60%
  Caustic Soda Liquid 60% has a proper shipping name of Sodium Hydroxide Solution and is defined as a class 8 dangerous Good under the ADG Code
- Sulfuric Acid 40%
  Sulfuric Acid is defined as a class 8 dangerous Good under the ADG Code
- Sodium Hypochlorite 50%
  Sodium Hypochlorite 50% has a proper shipping name of Hypochlorite Solution and is defined as a class 8 dangerous Good under the ADG Code
- Diesel
  Diesel is classified as a combustible liquid C1 under the ADG Code.

As can be seen there are some Dangerous Goods proposed to be stored at this Recycling facility. Moving forward with this assessment the storages of class 3 flammable liquids, class 8 corrosive liquids and C1 combustible liquids will be reviewed. It is also noted that there are many varying and diverse products that are also proposed with the majority of the sites storage not defined as Dangerous Goods under the ADG Code.

HAZARDOUS MATERIALS SUMMARY

Product	Quantity	UN	Class and PG
Hydrocarbons	2000 litres	3295	3 PG II, III
Kerosene, Oil		1223	3 PG III
Caustic Soda Liquid 60%	2000 litres	1824	8 PG II
Sulfuric Acid 40%	2000 litres	2796	8 PG II
Sodium Hypochlorite 50%	1000 litres	2582	8 PG III
Diesel	13,000L	-	C1 Combustible Liquids

This site is proposed to store at any one time a maximum of 2000L of a mixture of Class 3 PG II and PG III flammable liquids. Due to the nature of the business, being a recycling plant the quantities are dependent on the clients/industry's needs with quantities fluctuating between differing products although the intention is to never exceed this maximum storage. Products envisaged to be stored are based on current clientele and anticipated to fall in the categories of Hydrocarbons, Kerosene and Oils. These products all maintain either a PG II or PG III classification and as such all have been treated as the higher risk of PG II for this assessment.

The class 8 products are utilised in the treatment processes associated with the recycling plant. The products are stored in 1000L IBC's, allowing for one to be utilised by the treatment system with a second on stand by. A maximum of 2000L for Caustic Soda Liquid 60% and Sulfuric Acid 40% as well as a maximum of 1000L for Sodium Hypochlorite 50% will be maintained to enable consistent supply for on site processing.

C1 Combustible liquids stored in isolation from flammable liquids are not considered to be potentially hazardous and does not require any further assessment within this SEPP screening process. Should C1 combustible liquids be stored in the same bund or storage area as Class 3 flammable liquids, then they are to be calculated as though they are Class 3 PG III. In this instance the Diesel (C1 Combustible Liquids) storage is located in a self bunded tank away from the on site dangerous goods storages, and as such does not require any further assessment and can be omitted in the calculations going forward.

CALCULATIONS

The screening method set out in Applying SEPP 33 (Department of Planning, 2011) provides the first step in the analysis. The screening method is based on broad estimates of the possible off-site effects or consequences from hazardous materials present on site, taking into account locational characteristics.

If the quantity/distance is less than the screening threshold, then no further analysis is necessary. The safety management regime in this case relies on observance of the requirements of engineering codes and standards. If the quantities/distances exceed the screening threshold, further analysis is necessary.

Table 1 outlines the Screening Methods to be used for the relevant classes stored and the minimum applicable quantities. In this instance based on the proposed storages, the following classes are applicable:

Summary of Table 1 in part:

Class	Method to Use/Minimum Quantity
3 II	figure 9 graph if greater than 5 tonne
8	table 3

As the aggregate storage of Class 3 PG II is for a maximum of 2,000L the screen thresholds of Table 1 being 5 tonne is not exceeded. As such, it is determined that the storage of class 3 II is deemed not potentially hazardous and does not require screening and or further assessment under this SEPP.

Summary of Table 3 in part:

Class	Screening Threshold	Description
8	PG II	25 tonne
	PG III	50 tonne

Application of Table 3:

Class		Screening Threshold (Description)	Maximum Quantities	Outcome
Class 8	PG II	25 tonne	4,000 litres (4 tonne)	Threshold Not Exceeded
Class 8	PG III	50 tonne	1,000 litres (1 tonne)	Threshold Not Exceeded

As can be seen by utilising Table 3, the threshold quantities applicable for class 8 storages are not exceeded. As the Table 3 screening threshold quantities for class 8 PG II remain well below 25 tonne and PG III below 50 tonne, the storage is deemed as not potentially hazardous and does not require a PHA to be completed based on the quantities stored.

TRANSPORT SCREENING THRESHOLD

SEPP 33 screening also requires a study of the transporting/delivery frequencies, for the site as outlined in table 2 (below). It is envisaged that deliveries to site, for the varying classes of dangerous goods will be well within the allowable thresholds as itemised below.

Reference from Table 2: Transport Screening Thresholds (in part)

	Vehicle Movements		Minimum quantity* per load (tonne)
Class	Cumulative Annual or	Peak Weekly	Packages
Class 3 PG II	>750	>45	10
Class 8	>500	>30	5

* If quantities are below this level, the potential risk is unlikely to be significant unless the number of traffic movements is high

There are no bulk transport movements of dangerous goods associated with this site, only packages and IBC's are associated with transport movements for this site.

For Class 3 PG II packages, given that the maximum on site storage does not exceed 2000L/2 tonne at any one time, transport movements of 10 tonne would at no stage occur. Day to day transport movements would not be anticipated to ever exceed 1000L/ 1 tonne with the majority being significantly less given they are at times one off packaged products coming from clients for recycling.

It is envisaged that Class 8 packaged dangerous goods will be delivered to this site in transport loads not exceeding 2,000L/2 tonne when product delivery is required for the treatment process. Day to day transport movements would not be anticipated to

ever exceed 1000L/1 tonne with the majority being significantly less given they are at times one off packaged products coming from clients for recycling.

In this case, as the number of expected deliveries for the varying classes of storage are well below the screening thresholds, there are no requirements to do further analysis in the form of a PHA based on the transport screening thresholds.

ALTERNATIVE ASSESSMENT PROCESSES

Whilst the SEPP 33 process covers and assesses the potential hazards associated with dangerous goods storage it must not negate that non dangerous goods may pose a risk. As such, given the nature of this site being an Industrial Recycling facility, there are numerous hazardous type materials requiring handling and processing that may pose risks. Below is a list, although not exhaustive, of department approvals and industry guidelines that must be consulted for this proposal:

- Council Approvals and Conditions
- Fire Authority Approvals and Conditions
- EPA Approvals and Conditions
- Protection of the Environment Legislation Miscellaneous Amendment Act 2017
- Protection of the Environment Operations Act 1997
- Protection of the Environment Operations (General) Regulation 2009
- Protection of the Environment Operations (Waste) Regulation 2014
- AS 1940-2017 "The Storage and Handling of Flammable and Combustible Liquids"
- AS 3780-2008 "The Storage and Handling of Corrosive Substances"

CONCLUSION

This assessment looks at the potential hazards associated with the proposed dangerous goods storage at BRS Ingleburn. Through the assessment process this proposal has been determined to not exceed any storage or transport thresholds with the assistance of the screening methods of the NSW State Environmental Planning Policy 33 (SEPP 33). As such it can be determined that this site is deemed to be "not potentially hazardous" with no further assessment required under the NSW State Environmental Planning Policy 33 (SEPP 33) nor the need for a Preliminary Hazard Analysis to be undertaken.

DOCUMENT REFERENCES

[1] State Environmental Planning Policy 33, Hazardous & Offensive Development Application Guidelines. – Department of Planning NSW, January 2011.
[2] State Environmental Planning Policy 33, Hazardous & Offensive Development Application Guidelines. – Department of Planning NSW. Page 1, 1.2 the policy, last para
[3] State Environmental Planning Policy 33, Hazardous & Offensive Development Application Guidelines. – Department of Planning NSW. Page 9, 4.2
[4] Protection of the Environment Operations (Underground Petroleum Storage Systems) regulation 2014 division 1, clause 5 and 6
[5] State Environmental Planning Policy 33, Hazardous & Offensive Development Application Guidelines. – Department of Planning NSW. Page 18, table 2
[6] State Environmental Planning Policy 33, Hazardous & Offensive Development Application Guidelines. – Department of Planning NSW. Page 15 Definition "Hazardous Materials"

OTHER REFERENCES

Australian Standards:

AS 1940-2017	"The Storage & Handling of Flammable & Combustible Liquids"
AS/NZS 1596-2014	"Storage and Handling of LPG Gas"
AS 4897-2008	"The Design, Installation and Operation of Underground Petroleum Storage Tanks"
AS 3000-2007	"Electrical Wiring Rules".
AS/NZS 60079.10.1-2009	"Classification of Areas. Explosive gas atmospheres". Annex ZA "Examples of Hazardous Area Classification".
AS 2832.2-2003	"Cathodic Protection of Metals – Compact buried structures".
AS 2239-2003	"Galvanic (sacrificial) Anodes for Cathodic Protection".
AS/NZS 3788-2006	"Pressure Equipment – In-service inspection".
AS 4037-1999	"Pressure Equipment – Examination & testing".
AS/NZS 1841.5-2007	"Portable Fire Extinguishers".
AS 2444-2001	"Portable Fire Extinguishers and Fire Blankets". Select. & location.
AS 1692-2006	"Tanks for Flammable and Combustible liquids".

Codes of Practices:

Australian Code for the Transportation of Dangerous Goods by Road and Rail, Seventh edition.
NSW Code of Practice 2005 for Storage & Handling of Dangerous Goods.
NSW Work Health and Safety Act and Regs 2011.

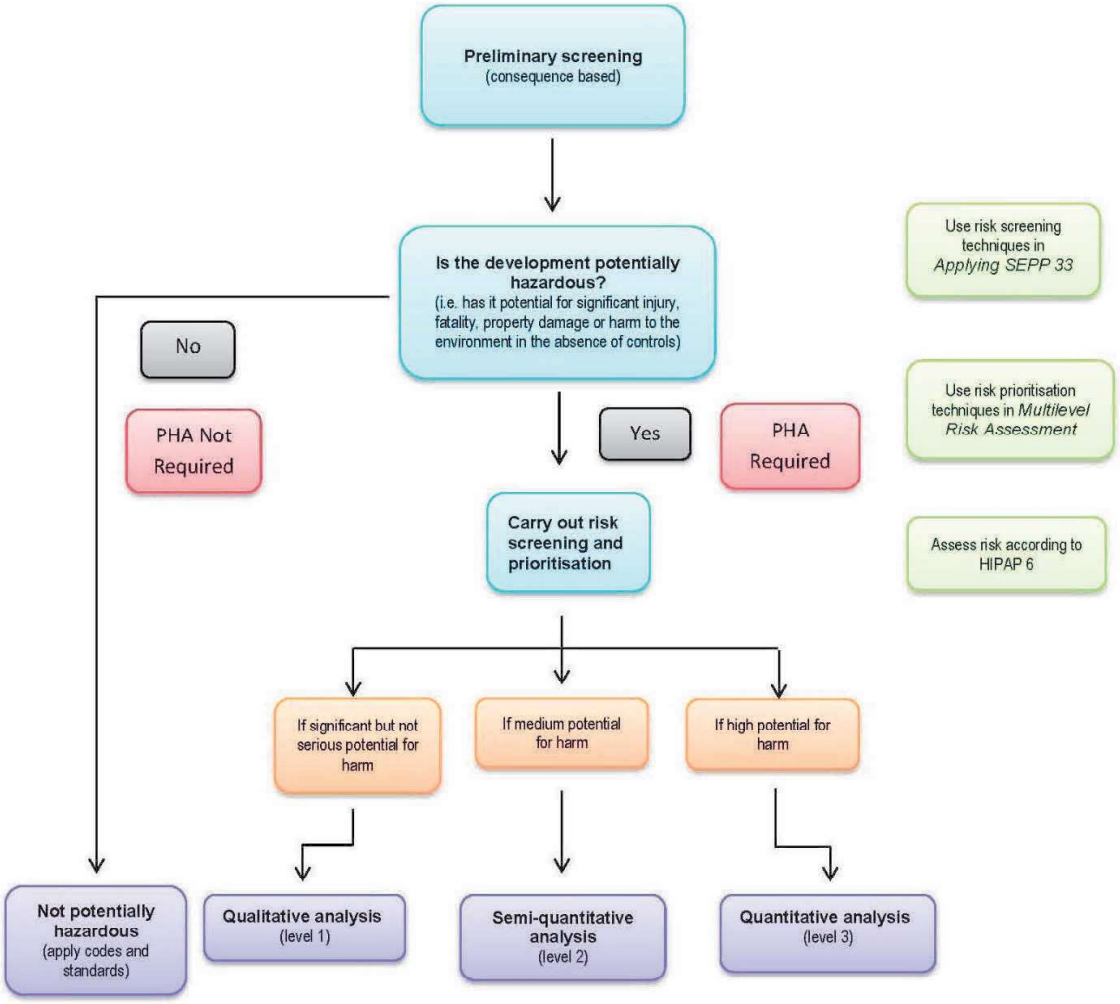
Planning NSW Guidelines:

Hazardous and Offensive Development Application Guidelines - Applying SEPP 33
Hazardous and Offensive Development Application Guidelines - Multi-Level Risk Assessment
Hazardous Industry Planning Advisory Paper No. 4 - Risk Criteria for Land Use Safety Planning
Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis
Hazardous Industry Planning Advisory Paper No. 8 - Hazard and Operability Studies

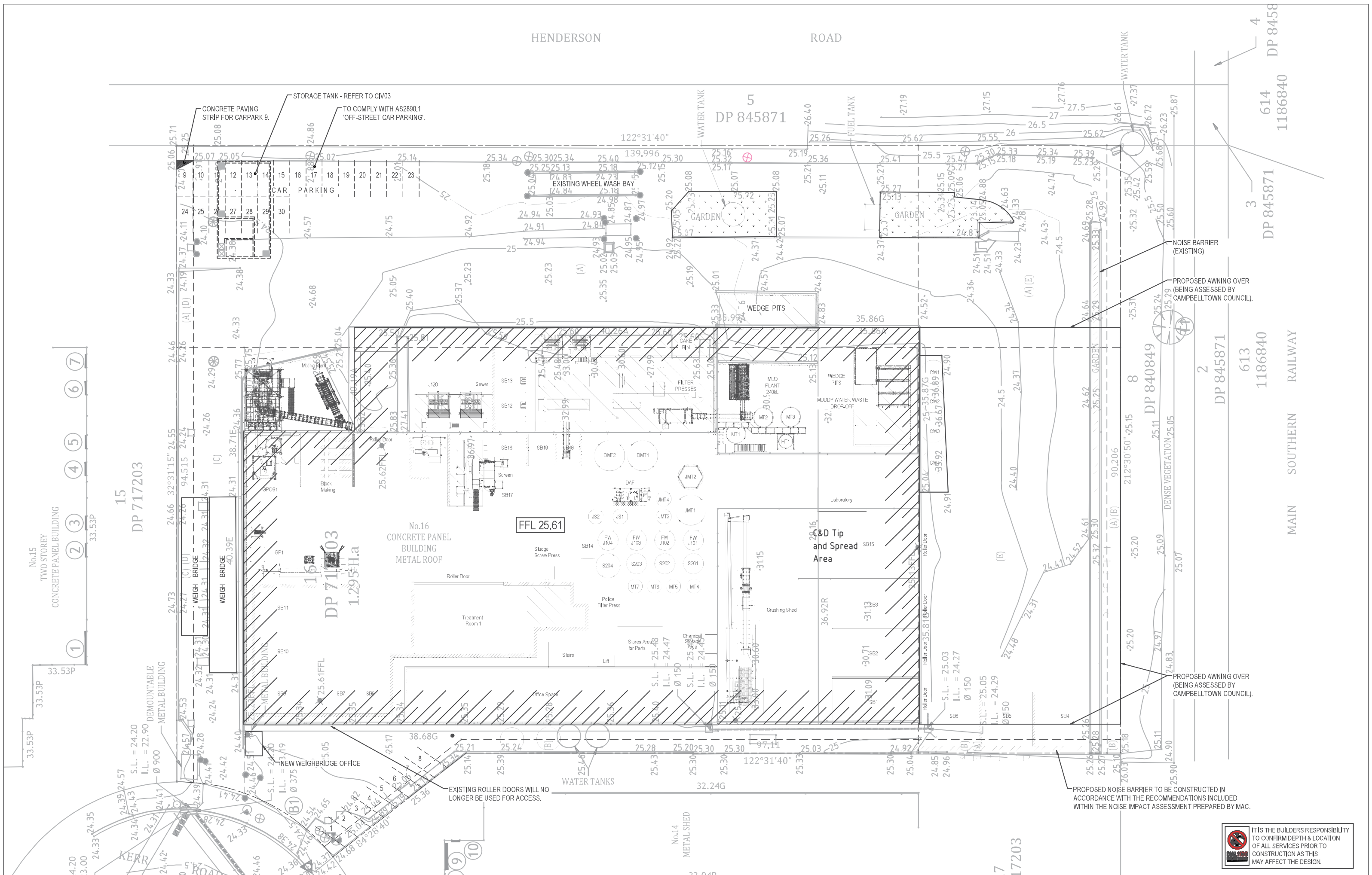
Other Documentation:

Local Authorities requirements, NSW WorkCover and EPA Acts and Regulations.
Equipment Suppliers Specifications, Requirements and Instructions.
Fuel System Specifications and Drawings.
Site Specific drawings and suppliers specifications.

APPENDIX 1
MULTI LEVEL RISK ASSESSMENT FLOWCHART


Preliminary screening
(consequence based)
Is the development potentially hazardous?
(i.e. has it potential for significant injury, fatality, property damage or harm to the environment in the absence of controls)
Use risk screening techniques in Applying SEPP 33
No
PHA Not Required
Yes
PHA Required
Use risk prioritisation techniques in Multilevel Risk Assessment
Carry out risk screening and prioritisation
Assess risk according to HIPAP 6
If significant but not serious potential for harm
If medium potential for harm
If high potential for harm
Not potentially hazardous
(apply codes and standards)
Qualitative analysis
(level 1)
Semi-quantitative analysis
(level 2)
Quantitative analysis
(level 3)

APPENDIX 2
PROPOSED SITE PLAN



REV	DATE	DRN	CHK	APP	DRAWING STATUS
P	23.10.20	R.F.	M.M.	M.M.	FINAL ISSUE - AMENDED
O	20.10.20	R.F.	M.M.	M.M.	FINAL ISSUE - AMENDED
M	09.09.20	R.F.	M.M.	M.M.	FINAL ISSUE - AMENDED
L	17.06.20	R.F.	M.M.	M.M.	FINAL ISSUE - FOR APPROVAL
K	15.06.20	R.F.	M.M.	M.M.	FINAL ISSUE - FOR APPROVAL
J	01.06.20	R.F.	M.M.	M.M.	FOR APPROVAL
I	22.05.20	R.F.	M.M.	M.M.	CLIENT REVIEW

REVISIONS

This drawing is not approved for construction unless signed.

Mathew McNamara
BEng (Civil) Hons ME (Aust)

North

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DRB CONSULTING ENGINEERS

PROPOSED SITE PLAN
16 KERR ROAD,
INGLEBURN
BRS

DRAWING STATUS	SHEET SIZE	
NOT FOR CONSTRUCTION	A1	
	SCALE 1:250	
PROJECT REF No. 180009	DRAWING No. SITE02	REVISION P