

File Ref. No: BFS14/2383 (6991)
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Contact: Senior Fire Fighter Simon Bracht

9 December 2014

Attention: Andrew Beattie
Dept. of Planning & Environment
GPO Box 39
SYDNEY NSW 2571

Email: andrew.beattie@planning.nsw.gov.au

Dear Mr Beattie,

**RE STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSD 5056 & EPBC
2011/6086) DEVELOPMENT OF MOOREBANK INTERMODAL TERMINAL
FACILITY**

I refer to your correspondence dated 17 October 2014 in regards to the above application. Fire and Rescue NSW (FRNSW) note that we have been invited by the Department of Planning & Environment (DoPE) to comment upon the above proposal (including advice on recommended conditions of consent).

The relevant details of the Environmental Impact Statement (EIS) included with the DoPE submission are:

- EIS authored by Vanessa Personnaz & Ainslie Just
- EIS dated 8 May 2014,
- EIS reviewed by Ainslie Just & Delyth Toghill.

Comment

FRNSW has reviewed the EIS for the Moorebank Intermodal Terminal (IMT, which is the acronym used throughout the EIS) and the following FRNSW comments, which form the basis of our recommendations to the DoPE, are provided for informative purposes, (please note, FRNSW does not object to our comments being forwarded to the proponent for their information should the Department so wish).

The EIS does not specifically identify and discuss some types of unplanned incidents (e.g. fire incidents and hazmat incidents) which may potentially pose risks to first responders and members of the public, some reference is made to possible areas which may



potentially be affected due to spillages or contaminant spread, but no detailed incident types are examined.

The Fire Brigades Act 1989 assigns statutory responsibility for safe resolution of fire incidents and hazardous material incidents (hazmat) to the Commissioner of FRNSW. Therefore our review is primarily concerned with potential fire scenarios and hazmat incidents which may involve the hazardous materials identified in Section 14.2.1 of the EIS and also detailed in Sections 4.6 and 5.4 of Technical Paper 9 – Health Impact Assessment, in these sections hazardous material and air pollution have been mentioned, but not in the context of a fire.

Should a fire or hazmat incident involving the rail corridor or warehouse storage areas occur (whichever of the rail options is chosen), it is important that first responders have ready access to information which enables effective control measures to be quickly implemented. Information which is recommended to be readily available to first responders should include:

- The names and quantities of the materials or dangerous goods which may be involved in a fire/hazmat incident (primarily those that are stored regularly on site).
- The properties of all fuels and documented dangerous goods (including when involved in a fire).
- The risk to health posed by identified materials or dangerous goods (especially when involved in a fire).
- The appropriate control measures which must be implemented in order to safely mitigate potential risks. Such measures would include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures, minimum evacuation zone distances and the means to bund or confine contaminated water and fire water runoff.
- Unique control measures implemented which are specific to the site, including that which will be used to prevent contaminated fire water runoff into the local waterways in the event of a protracted incident or one that occurs on the border of the IMT.
- The location of any nearby public infrastructure which may be at risk from a significant fire and its contaminated smoke plume (e.g. main train lines, flight paths, public road ways and public assembly areas).

The following potential fire hazards are highlighted by FRNSW, (please note however that the following hazards have been identified following a brief review of the EIS and the associated preliminary risk assessment (PRA) and therefore the list below may not be exhaustive). Additionally, some of the following scenarios have been identified in Table 14.6 of Chapter 14):

- a) Vehicle or train refuelling fire.
- b) Vehicle or train refuelling spill.
- c) Plant and equipment fire.
- d) Stored container fire.
- e) Stored container hazardous materials spill.
- f) Vehicle collision causing a fire or hazardous materials spill.
- g) Train collision or derailment causing a fire or hazardous materials spill.



Recommendation/s

That the Director General consider including conditions of development consent which require:

1. That appropriate emergency procedures are developed by the proponent to address and mitigate, as far as reasonably practicable, the consequences of fire and hazmat incidents and the potential health risks to firefighters undertaking emergency operations in relation to foreseeable fire/hazmat scenarios.
2. Two copies of the emergency plan (detailed in recommendation 1 above) are recommended to be stored in a prominent 'Emergency Information Cabinet' which is located in a position directly adjacent to the entry point for vehicular access off Moorebank Avenue (multiple copies if there is more than one entry point or additional control centre).
3. That warehouses be sprinkler protected in accordance with the requirements of Australian Standard (AS) 2118.1 – 1999 when such protection is required under the deemed to satisfy provisions of Clause E1.5 of the Building Code of Australia (BCA) due to the warehouses' floor areas/volumes or the nature of the contents of the building.
4. That buildings exceeding 500 m² in floor area be served by fire hydrant systems which comply with AS2419.1 – 2005.
5. That all areas of open yard storage be served by fire hydrant systems which comply with the requirements of Clause 3.3 of AS2419.1 – 2005.
6. To ensure that FRNSW personnel are able to effectively manage a fire incident located in or near the rail corridor and associated infrastructure, that consideration be given with respect to the installation of suitable fire hydrant provisions serving the rail corridor and associated infrastructure.
7. That all fire hydrant systems be designed in consultation with the Fire Safety Assessment Unit of FRNSW.
8. That perimeter access for fire fighting vehicles be provided around both the warehousing areas and container storage yards. Emergency pedestrian access provisions to the rail corridor and associated structures, suitable for use by FRNSW personnel, should also be taken into account when the development of design and response strategies are undertaken.

Conclusion

The development of an effective emergency response plan, specific to the IMT, would be significantly enhanced by the site's operators engaging and liaising with FRNSW local command management. Such enhancement would be best facilitated by ensuring that FRNSW personnel were afforded the opportunity to undertake pre-incident planning of identified hazards and to familiarise themselves with the emergency procedures developed



by the proponent. The relevant contact details of FRNSW local command management are:

Zone Office Metropolitan South 3 – Sydney South
9 Swettenham Rd, St Andrews NSW 2566
Telephone: 02 9824 6256
Business Hours: 8:00 am – 4:30 pm.

FRNSW thanks the DoPE for the opportunity to comment upon the application. For further information please contact Simon Bracht of the Fire Safety Assessment Unit, referencing FRNSW file number BFS14/2383 (6991). Please ensure that all correspondence in relation to this matter is submitted electronically to bfs@fire.nsw.gov.au.

Yours sincerely



Mark Castelli
Team Leader
Fire Safety Assessment Unit

