

Michele Nettlefold

Subject: FW: SSD 6617 Exhibition of application for remediation works, part Hickson Road, Barangaroo
Attachments: placarding-for storage-of-hazardous-chemicals-4630[1].pdf

From: Battye, Andrew [mailto:Andrew.Battye@safework.nsw.gov.au]
Sent: Friday, 20 November 2015 12:17 PM
To: Michele Nettlefold
Cc: Nikolovski, Steven; Finlay, Mary Ann; Sukara, Zoran; Robinson, Peter
Subject: SSD 6617 Exhibition of application for remediation works, part Hickson Road, Barangaroo

Security Classification:UNCLASSIFIED

Hi Michele,

I am writing in response to your request for comment re SSD 6617 at Barangaroo.

Therefore, please find following comments that relate specifically to the **storage and handling of the hazardous chemicals** that will be brought on site in the event of in-situ remediation work taking place.

We have paid particular attention to the Preliminary Hazards Analysis document.

1. The report would benefit from a consideration of all the hazardous chemicals rather than a focus on those that are dangerous goods so that a comprehensive chemical management plan can be implemented to mitigate risks during the lifecycle of all the chemicals on the site.
2. As the hazardous chemicals will be on site for an extended time consideration needs to be given to the following:-
 - a. The quantities of hazardous chemicals proposed to be used handled and stored exceed the thresholds for manifest quantities (as per Schedule 11 of the Work Health & Safety Regulation 2011 [Regulation]). The site is therefore a manifest quantity workplace (MQW). For example:-
 - i. The quantity of class 5.1 PG11 (oxidant and peroxide) of 11,000L exceeds the manifest level of 2,500L.
 - ii. The quantity of class 8 PG 11 (Sodium hydroxide and hydrochloric acid) also exceed the manifest quantity.
 - b. As a MQW the following is required:
 - i. Development and maintenance of a site manifest in accordance with clause 347 and Schedule 12 of the Regulation to be kept in a place that is readily acceptable to emergency services and available for inspection. Preferably this would be kept in a red waterproof cabinet secured with a 003 key and with white lettering HAZMAT.
 - ii. Notification to SafeWork NSW using the on-line notification form.
 - iii. Develop and maintain a site emergency plan and lodge this with FRNSW on their website. A copy of the confirmation needs to be kept as evidence this has been submitted.
 - c. Other requirements relating to hazardous chemicals at the site:
 - i. Placards: An outer warning placard will be required



- ii. Bulk placards will be required for all bulk storages of hazardous chemicals. Placards for packaged stored above placard levels. Refer to the guide. Placarding for Hazardous Chemicals Guide Catalogue No. WC04630 (Attached)
- iii. Hazardous chemical register and up to date Safety Data Sheet for all hazardous chemicals including waste.

Hazardous_Chemical_
Register_factsheet[1].

- d. **Packaging** - all dangerous goods must be transported and stored in approved packages including IBC. Bulk plastic tanks used to store hazardous chemicals must comply with the relevant standards.
- e. **Labelling**- all hazardous chemicals including those in any pipe works during the remediation process will need to be appropriately labelled.
- f. **Spill containment** - bulk storage spill containment bunds need to be designed so that they have the appropriate capacity, can capture the spill (consideration of crest locus requirements) and do not allow incompatible chemicals to come together. Spill kits need to be appropriate for chemicals used, maintained and workers need to be trained in their use.
- g. **Separation distances**- need to be maintained not only to the boundary but also between incompatible chemicals as per the SDS and relevant Australian Standards.
- h. **Hazardous areas**- (Surfactant) A hazardous area diagram needs to be developed to clearly show all hazardous areas (stage and transfer). Consideration of the prevention of ignition sources from on and off site need to be considered and procedures implemented. It is not sufficient to consider only the introduction of ignition sources from cigarette butts from the rock wall.
- i. **Transfer operations**- As well as the controls described, there should be consideration of overfill protection/systems. Where safety showers have been provided they will need to be inspected tested and maintained in accordance with the Australian standard or equivalent level of safety.
- j. **Protection from damage**- all storage of hazardous chemicals need to be protected from damage such as vehicular impact. It is recommended a traffic management plan be developed and consideration given to impact protection in particular for bulk storage.
- k. **Contaminants**- consideration of the possible worker exposure to other hazardous chemicals in particular the toxic and potentially carcinogenic compounds typically found during gas work remediation such as benzene, naphthalene, PAH etc. However it is noted this may be covered in other documentation.

I trust that these comments are helpful, should you require any further clarification or assistance please feel free to contact me in the first instance.

Kind regards

Andrew

Andrew Battye

A/Team Manager

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