



File Ref. No: BFS16/1540 (11099)
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 Contact: Station Officer C. Wheatley

The Department of Planning & Environment
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22 August 2016

Dear Ms Appleton

**Environmental Impact Statement
 Mortdale Resource Recovery Facility (SSD 7421)
 20 Hearne Street Mortdale**

I refer to the above development proposal's Environmental Impact Statement (EIS) which is currently on public exhibition (from Friday 22 July until Monday 22 August 2016). The EIS has been prepared by Mr Anthony Williams of APP Corporation Pty. Ltd. and is dated 29 June 2016 – Revision 1.

Fire and Rescue NSW (FRNSW) have reviewed the EIS, including various Appendices, in particular, Appendix L – Preliminary Hazard Analysis (PHA), *SEPP 33 Preliminary Risk Screening & Hazard Assessment*. The PHA has been prepared by SLR Consulting Australia Pty. Ltd. Reference 610.14692.-R0 – Revision 0, dated 12 April 2016. FRNSW note that the primary purpose of the facility is for waste storage and processing of general mixed waste.

With regard to waste and resource management facilities, it is FRNSW experience that due to the processes undertaken and the nature of the products stored and processed, they are subject to more frequent and significant fire incidents (often of long duration) that require the deployment of considerable FRNSW resources in order to be safely resolved.

In addition, due to the nature of materials being stored and processed at the facility, there is significant potential for large volumes of contaminated fire water runoff to pollute off-site storm water management systems and water courses, such as ecosystems within Lime Kiln Bay (as detailed within Appendix J – Soil and Water Assessment dated 5 May 2016). Due to the significant potential there is an increased likelihood that FRNSW personnel would need to actively manage the containment of polluted fire water runoff during a fire incident (n.b. a specific function imposed upon



the Commissioner of FRNSW by virtue of Section 10A of the Fire Brigades Act 1989).

Based on our review, the following comments and recommendations are submitted to the Department of Planning and Environment (the Department) for consideration:

Comments/Recommendations

1. FRNSW considers the proposed storage of Dangerous Goods as detailed within detailed drawing numbers 151045 – 03.2/18 EIS – Revision I and SY16043c101 – Revision E, in conjunction with the information provided within part 6.4.1 of the EIS, to be inconsistent. FRNSW recommends that the proposed storage provisions, fuel dispensing, tank vehicle loading provisions and fire protection for the proposed stored Dangerous Goods be clarified and in accordance with Australian Standard AS 1940 – 2004.
2. FRNSW considers the proposed increase in materials to be stored and processed at the facility to represent a realistic possibility for a high fire load and fire hazard with the potential for problematic firefighting operations. Such an incident at the facility would require significant resource commitment by FRNSW in order to ensure safe resolution of the fire incident.

The EIS and PHA do not provide any details or commitments to the installation of a fire hydrant system at the site in order to assist FRNSW in undertaking its statutory duty for the extinguishment of fires and protecting life and property, in case of fire at the facility.

In the event of the development proposal being approved, and due to the potential high fire load nature of the development, FRNSW recommends that any conditions of consent include a requirement that the development comply with Clause E1.10 of the National Construction Code. In particular, the fire hydrant system's performance, with respect to minimum flow rates, should be specifically addressed. With the exception that the proposed shed and awning being appropriately sprinkler protected, FRNSW would not consider Table 2.1 of AS 2419.1 – 2005 to be an appropriate methodology to determine the fire hydrant system's minimum flow rates.

3. As detailed above, the nature of this particular development will require FRNSW personnel to pro-actively manage an incident of fire and the subsequent containment of polluted fire water runoff during/after the incident.

FRNSW recommends that the site's surface and storm water management systems be designed to provide FRNSW with an ability to contain contaminated fire water runoff. The design of the systems capacities is recommended to take into account the possibility of the concurrent operation of a sprinkler system (if incorporated) and fire hydrant system to extinguish a worst case fire scenario at the facility.

4. In the event of development consent being granted, it is FRNSW recommendation that a Fire Safety Study (FSS) is developed and that the FSS

is undertaken in accordance with the recommendations detailed in Hazardous Industry Planning Advisory Paper No.2.

It is also recommended that the FSS be approved by FRNSW to ensure its operational requirements are met.

For further information please contact Cameron Wheatley of the Fire Safety Assessment Unit, referencing FRNSW file number BFS16/1540 (11099). Please ensure that all correspondence in relation to this matter is submitted electronically to bfs@fire.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'W. Isemonger', written in a cursive style.

Superintendent Warwick Isemonger
Acting Manager
Fire Safety Assessment Unit