From:	Brendan.M Hurley
To:	Lander Robinson
Cc:	Fire Safety
Subject:	Dunedoo Solar Farm (SSD-8847) - Request for Advice on EIS. BFS20/3275
Date:	Tuesday, 17 November 2020 12:31:52 PM
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Dunedoo Solar Farm (SSD-8847) - Request for Advice on EIS

Dear Lander,

I refer to the submission of the request for agency input into development of Environmental Impact Statement (EIS), dated September 2020, for the Dunedoo Solar Farm (SSD-8847) to Fire & Rescue NSW (FRNSW). The relevant parts of the proponent's EIS have been reviewed and the following comments are submitted for consideration.

Large scale solar farm developments are usually located within NSW Rural Fire Services' (RFS) fire districts. Notwithstanding, in the event of either a significant fire event or hazardous material incident (hazmat), FRNSW will be responded to either assist the RFS or to fulfill the role of the designated hazmat combat agency.

It is FRNSW experience that large-scale photovoltaic installations present unique hazards and risks to our personnel when fulfilling their emergency duties. It is highlighted that the Fire and Rescue NSW Act 1989 (the Act) imposes specific statutory functions and duties upon the Commissioner of FRNSW. Clause 5A of the Act requires the Commissioner to take all practicable measures for preventing and extinguishing fires and protecting and saving life and property within a FRNSW fire district. Clause 5A of the Act also requires the Commissioner to protect and save life and property endangered by hazmat incidents and for confining a hazmat incident and for rendering the hazmat site safe.

In addition, the Work Health and Safety (WHS) Act 2011 (and its subordinate Regulation) classify FRNSW as a person (entity) conducting a business or undertaking (PCBU). Clauses 34 and 35 of the WHS Regulation impose specific obligations upon a PCBU to identify hazards and manage risks at workplaces. A site involved in fire or hazmat incident is deemed to be a FRNSW place of work.

Due to the electrical and fire hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

In the event of a fire or hazardous material incident, it is important that first responders have ready access to information which enables effective hazard control measures to be quickly implemented. Without limiting the scope of the emergency response plan (ERP) requirements of Clause 43 of the Work Health and Safety Regulation 2011 (the Regulation), the following matters are recommended to be addressed:

1. That a comprehensive Emergency Response Plan (ERP) is developed for the site.

2. That the ERP specifically addresses foreseeable on-site and off-site fire events and other emergency incidents (such as fires involving solar panel arrays, battery energy storage systems, bushfires in the immediate vicinity) or potential hazmat incidents.

3. That the ERP details the appropriate risk control measures that would need to be implemented to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards).

   Such measures will include the level of personal protective clothing required to be worn, the minimum level of respiratory protection required, decontamination procedures to be instigated, minimum evacuation zone distances and a safe method of shutting down and isolating the photovoltaic system (either in its entirety or partially, as determined by risk assessment).

4. Other risk control measures that may need to be implemented in a fire emergency (due to any unique hazards specific to the site) should also be included in the ERP.

5. That two copies of the ERP (detailed in recommendation 1 above) be stored in a prominent 'Emergency Information Cabinet' located in a position directly adjacent to the site's main entry point/s.

6. Once constructed and prior to operation, that the operator of the facility contacts the relevant local emergency

management committee (LEMC). The LEMC is a committee established by Section 28 of the State Emergency and Rescue Management Act 1989. LEMCs are required to be established so that emergency services organisations and other government and non-government agencies can proactively develop comprehensive inter agency local emergency procedures for significant hazardous sites within their local government area. The contact details of members of the LEMC can be obtained from the relevant local council.

7. FRNSW further recommends that as a Condition of Consent a Fire Safety Study (FSS) be prepared for the Battery Energy Storage (BESS) *(page 34 of the EIS report)* part of the site and submitted to FRNSW for review and determination. The FSS should be developed in consultation with and to the satisfaction of FRNSW.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/3275. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards
Brendan

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