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Contact: Qualified Firefighter Nathan Everett

13 December 2018

Department of Planning and Environment  
C/- Luisa Maguire  
GPO Box 39  
Sydney NSW 2001

E: [Luisa.Maguire@planning.nsw.gov.au](mailto:Luisa.Maguire@planning.nsw.gov.au)

Dear Ms Maguire,

**Environmental Assessment Exhibition  
Regain Spent Potlining Processing Facility  
638 Tomago Road, Tomago (Port Stephens Council)  
Ref MP06\_0050 MOD 2 – Lot 3 in DP808004**

I refer to your submission and request for comment from Fire + Rescue NSW (FRNSW) regarding the Exhibition of Modification for Regain Spent Potlining Processing Facility as referenced above dated 13 November 2018. A Report has been prepared in support of an application by Regain Services Pty Ltd (the proponent) to increase Spent Pot Lining (SPL) processing capacity at their site located within the footprint of the Tomago Aluminium Smelter.

Details of the report submitted and reviewed are as follows:

- Environmental Assessment, prepared by Aecom Australia Pty Ltd, report title: Capacity Increase at the Regain Spent Potlining Facility, Tomago, dated 13 November 2018, report ref. number 60512726, Revision 3.

It has been the experience of FRNSW that processing facilities such as SPL processing pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. It is often necessary to give special consideration to the provision of additional fire safety measures in order to address such factors and mitigate the risks they pose. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

The following notes and comments are provided following a review of relevant parts of the Report.

- It is noted that the main works to be undertaken in order to achieve the increase in processing capacity include:
  - Installation of an additional thermal treatment plant.
  - Rationalisation of plant configuration to take advantage of improvements in technology.
  - Installation of additional stormwater controls.
- It is noted that there is to be no significant increase in the volume of processed material stored on site.
- The development has previously been assessed against the requirements of State Environmental Planning Policy 33 – Hazardous and Offensive Development (SEPP 33) and a subsequent Preliminary Hazard Analysis (PHA) completed (SKM, 2007). A preliminary screening analysis undertaken for the modification including a gap analysis against the existing PHA has found that the existing risk profile would not change.
- It is noted that the SPL facility is operated in accordance with the Tomago Aluminium Emergency Response Plan and that a number of key firefighting aspects are provided within section 7.2.1 of the Report.
- It is noted that Safety Data Sheets (SDS) have been provided for materials at the SPL facility.
- FRNSW are unable to determine whether the existing fire safety systems are adequate for the SPL facility as no relevant information regarding these has yet been provided.

The following recommendations are provided following a review of the relevant parts of the Report.

- That a Fire Safety Study (FSS) be undertaken for the site in accordance with HIPAP 2. The study should be developed in consultation with and to the satisfaction of FRNSW. In the case where a FSS for the Tomago Aluminium Smelter site exists, it should be updated to include the SPL facility operations. Consideration shall be given to the requirements of HIPAP 2 whereby:  
*“Where development involves the extension or substantial modification of an existing facility, the study should be set in the context of the fire hazard and systems for the entire site”* (HIPAP 2, 2011).
- FRNSW recommend that prior to the submission of a Fire Safety Study, consultation with FRNSW (via a meeting) shall be undertaken to determine firefighting requirements and operational expectations.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/3407. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "Mick Henly". The signature is fluid and cursive, with the first name "Mick" and last name "Henly" clearly distinguishable.

Superintendent Mick Henly  
**Manager Infrastructure Liaison Unit**  
**Community Safety Directorate**