Memorandum

To	Kerry Hamann
cc.	Lilia Donkova
From	Irene Martin
Date	15/09/2016

Subject: Joe White Malting, Minto (MP 08-0157, MOD4)

Background:

MOD 4 - Proposal to increase the road ***import*** by an additional 103,000 tonnes of barley and other grain per annum on site.

Original approval was granted in May 2009, with Condition 6 stipulating 'The proponent shall not – ***import*** more than 270,000 tonnes of malting grain and barley per annum on site" and Condition 7 stipulated that "all delivery of grain and barley to and all dispatch of product from site to be by rail".

On April 2012, MOD 1 was approved for the transport of some goods by road rather than rail, Condition 7 of the approval was amended to "The proponent shall ensure that the project does not ***import*** more than 54,000 tonnes per annum of grain and barley by road…"

With the current proposed modification (MOD 4), the total import by road will stand at 157,000 tonnes per annum. Overall, this is a 58% increase in frequency of road imports against the original approval for rail deliveries only.

Issue

The initial approved development outlined the utilisation of rail for grain movements into the plant. Barley was received in purpose built, reusable rail containers through the rail siding on the adjoining MIST (Qube) site. The containers are offloaded and emptied via a special inverter unloader, a device that will elevate and tip the container into a receiver pit. From this pit the barley is elevated and conveyed into barley silos.

The Preliminary Environmental Assessment (PEA) July 2008 for proposed Malting Plant (Lot 201 DP813362) for JWM, included a statement that there will be design capability to receive barley by road in an emergency situation (PEA, p36 S6.9.2). An emergency situation is an infrequent occurrence. Since this PEA, MOD 1 was undertaken and now MOD 4 will further increase receiving barley by road trucks, the operation will no longer be operating in an emergency situation.

(*Dust concentrations within the explosive range and the presence of an ignition source, static electricity, truck exhaust backfire at start up are potential sources of ignition).*

MOD4 does not provide detail or information around the truck transfer process or operation. The original approved structure was for a container grain transfer station to receive rail containers. The proposed change in mode to predominately truck deliveries, requires re-assessment to ensure there are adequate controls in place to accommodate the higher frequency of truck imports.

There is insufficient information on the proposed road truck delivery operation, the time taken to unload, the number of truck movements on site, to determine if there are adequate controls in place to prevent site congestion and potential sources of ignition around the transfer operations.

Recommendations

Require:

1. Further information is sought around the proposed road truck importation method of transfer, duration of truck transfers, operational safeguards, preventative and mitigating controls and the current adequacy of facility to accommodate and prevent dust cloud emissions and fires in the unloading bay.
2. Original plant design included an option to receive barley by road in an emergency situation. The MOD 4 proposal, will now increase the overall frequency of importing by road. The plant design should be reviewed to ensure that hazards and risks from grain dust fires and explosions are assessed and necessary safeguards in place.
3. Since the original consent, May 2009, there have been three modifications that have been approved; MOD1 (importation of some goods by road rather than rail), MOD 2 included the installation of 12 additional storage silos on site and MOD 3 was the approval for an office expansion. With the potential approval of MOD 4, the site may become more congested, with more vehicle movements throughout the site including road trucks entering and egressing. It is recommended that a hazard and risk assessment is undertaken to ensure that the proposed road importing will not introduce any new risks associated with grain dust and fire risks, and any identified additional safeguards to be implemented to minimise or control these risks.