



COMMUNITY SAFETY DIRECTORATE  
STRUCTURAL FIRE SAFETY UNIT  
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NSW Planning and Infrastructure  
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Cc: [Chris.Ritchie@planning.nsw.gov.au](mailto:Chris.Ritchie@planning.nsw.gov.au)

Attention: Chris Ritchie

Dear Sir

Re: Jet Fuel Pipeline Upgrade Project (11\_0004).

I refer to your recent correspondence regarding the Caltex Jet Fuel Pipeline Upgrade Project (11\_0004).

The current submission consists of a request for the Fire and Rescue NSW (FRNSW) to comment on an Environmental Assessment (EA), prepared by Michael Chilcot of URS Australia Pty Ltd and dated April 2011, conducted on the above project. The EA includes matters referred to in the Director General's Requirements under Section 75F of the Environmental Planning and Assessment Act (EP & A) 1979. FRNSW notes that a Preliminary Hazard Analysis (PHA) has also been included in the submission as appendix 8.

The project is subject to the assessment processes and requirements of Part 3A of the EP & A Act. Also, as the site deals with significant quantities of a dangerous good (jet fuel) it meets the criteria of a potentially hazardous development as defined by Part 1, Clause 3 of the State Environmental Planning Policy (SEPP) No 33 – Hazardous and Offensive Development.

FRNSW has reviewed the submitted EA and the following comments are provided:

1. FRNSW expect any new building proposals and substantial alterations to existing buildings would comply with the current Building Code of Australia and relevant Australian Standards.
2. FRNSW believes that the site's operators may be required to prepare and submit to the NSWFB an Emergency Plan (EP) to ensure compliance with clauses 174ZC and 175P of the Occupational Health & Safety Regulations 2001, as applicable. It is recommended

that the EP follow FRNSW Policy No 1: *Guidelines for Emergency Plans at Facilities Having Dangerous Goods, Explosives and Major hazard facilities.*

3. The submitted Preliminary Hazard Analysis outlines possible fire scenarios in section 3 but lacks detail regarding installed fire protection, proposed mitigation methods and possible consequences relating to the worst case fire. FRNSW notes that section E3 of the Executive Summary (Recommendations) states in part: "Depending on the results of the Fire Safety Study, further risk reduction may need to be considered".
4. In addition to the previous point 3 and the fact that the project could be classified as hazardous or offensive under SEPP No 33, FRNSW believes that a Fire Safety Study should be prepared in accordance with Hazardous Industry Planning Advisory Paper (HIPAP) No. 2 and if deemed appropriate by the consent authority, submitted to FRNSW for review and comment.

Should you have any further enquiries regarding any of the above matters, please do not hesitate to contact the Structural Fire Safety Unit.

Yours faithfully

Electronically approved for release

For Commissioner