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Attention: David Schwebel

NSW Environment Protection Authority Advice
DHL Supply Chain (Australia) Pty Ltd Dangerous Goods Facility (Application 4953-Mod-2)
23 –107 Erskine Park Road, Erskine Park (Lot 1 DP 1128233).

Dear Mr Schwebel

Thank you for providing the NSW Environment Protection Authority (EPA) an opportunity to review DHL Supply Chain (Australia) Pty Ltd Dangerous Goods Facility (Application 4953-Mod-2) at 23 – 107 Erskine Park Road, Erskine Park (Lot 1 DP 1128233) (“the Premises”).

DHL Supply Chain (Australia) Pty Ltd (“DHL”) currently hold an environment protection licence No. 20163 (the Licence) which permits the storage of chemicals (0-5000 kL) at the Premises. The EPA has reviewed the proposal within the context of the Licence.

The EPA has reviewed the following document:

- Application for Modification to SSD-4953 Dangerous Goods Facility 23 – 107 Erskine Park Road, Erskine Park Lot 1 DP 1128233. Prepared by Willowtree Planning Pty Ltd on behalf of DHL Supply Chain (Australia) Pty Ltd February 2021

The EPA understands the proposal is for a modification to accommodate additional classes and quantities of dangerous goods (“DG”) at the Premises. The EPA notes it does appear that the proposal is to significantly increase the quantities of DG stored at the Premises.

Based on the information provided, if the modification is approved, DHL will be required to lodge an application for a Licence variation in accordance with section 58 of the *Protection of the Environment Operations Act 1997* (POEO Act). DHL will need to apply for a variation for scale and type of chemicals (DG) stored at the Premises.

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To assist the EPA provides the following comments:

A. Stormwater isolation valves

In accordance with conditions E1.1 – E1.3 all stormwater isolation valves are required to be maintained. The EPA expects a review of the current preventive maintenance program (PMP) for stormwater isolation valves, including, but not limited to:

- I. the frequency of testing of the stormwater isolation valves to assure functionality;
- II. up to date details on how the stormwater isolation system operates along with the location of the stormwater isolation valves depicted on site maps;
- III. outline measures that have been taken to ensure all employees are trained and understand the stormwater isolation system in the event of an incident occurring.

B. Aerosol cages

The EPA expects confirmation that;

- I. aerosol cages are fitted with automatic closing doors to confine aerosols either as a matter of course, or in the event of a fire;
- II. the aerosol cages are included in a PMP to ensure functionality in the event of an incident.

C. Storage & handling of chemicals (DG)

The EPA expects the following specific information to be provided;

- I. details of the type and quantity of all chemical (DG) to be stored and any specific controls in place for that specific chemical (DG);
- II. confirmation that off-loading, handling and loading of chemicals (DG) is carried out in an area that is isolated from stormwater in the event an incident occurred;
- III. a diagram detailing the location of all bunding walls and blind pits in and around the Premises:
 - a. Detail measures in place to prevent overflows from pits and tanks (such as high-level alarms);
 - b. Information on plant and equipment:
 - The number, type, capacity of each significant item of plant;
 - The vessels/containers/methods used to store the chemicals (DG).

D. Spill mitigation and firewater containment

The EPA expects the following specific information is provided;

- I. a review of spill mitigation measures to prevent and mitigate leaks and spills from the storage area and other project operations and activities considering the proposed increased quantity of chemical (DG) to be stored;
- II. are appropriate primary and secondary containment systems adequate considering the proposed increase in quantity of chemical (DG) to be stored;
- III. details of bunding, isolation, overflow prevention and other controls to demonstrate spill and leak related risks have been appropriately considered and addressed;
- IV. details of fire water containment and fire mitigation systems.

E. Pollution Incident Response Management Plan (PIRMP)

The EPA expects that the 'Pollution Incident Response Management Plan' (PIRMP) is developed in compliance with Part 5.7A of the Protection of the Environment Operations Act (1997) in relation to the activity and considers the additional type and quantity of chemical (DG) proposed to be stored at the Premises.

If you have any questions about this request, please contact Rhys Inez on (02) 9995 6359 or via email at info@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Playford', written over a faint circular stamp.

11 March 2021

Danielle Playford
Unit Head
Regulatory Operations Metro West