

8th September, 2016 Level 4, Grafton Bond 201 Kent Street Sydney NSW 2000 Ph: (02) 9299 6605

Reference: R200444

Guy Smith Level 17, 60 Castlereagh St Sydney NSW 2000

Attn: Mr Guy Smith

Re: Mulford Plastics SEPP33

Dear Guy,

Many thanks for your inquiry regarding the application of State Environmental Planning Policy No.33 (Hazardous and Offensive Developments) to the proposed Mulford Plastics Warehouse at the Oakdale Industrial Estate. I have conducted the review (attached) and based on the results of the assessment I conclude that SEPP33 does not apply to the proposed warehouse; hence, the facility would not be considered potentially hazardous and no further assessment would be required under the Environmental Planning and Assessment Regulations with regards to Dangerous Goods.

The attached SEPP33 assessment for the proposed Warehouse is fairly self-explanatory, however should you have any queries regarding the assessment, please do not hesitate to contact me on my mobile (0438 749 181).

Yours faithfully,

CORE Engineering

Renton Parker

Risk Engineer

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MULFORD PLASTICS WAREHOUSE OAKDALE INDUSTRIAL ESTATE

STATE ENVIRONMENTAL PLANNING POLICY NO.33 ASSESSMENT

1 INTRODUCTION

1.1 BACKGROUND

Mulford Plastics has proposed to develop a Warehouse within the Oakdale Industrial Estate (OIE), NSW. The warehouse will comprise a warehouse which will contain predominantly non-Dangerous Goods products; however, there will be minor quantities of adhesives which are classified as Dangerous Goods (DGs) stored. As DGs are stored, it will be a requirement of the Development Application to assess the applicability of the State Environmental Planning Policy No. 33 (SEPP33).

To assist with the preparation of a SEPP33 assessment, Goodman, on behalf of Mulford Plastics, has commissioned CORE Engineering Group (CORE) to review the proposed DG storage and handling at the site and to report on the finding of the review with regards to the application of the policy.

This document represents CORE's assessment of Warehouse and the application of SEPP33.

1.2 OBJECTIVES

The objective of the study is to identify whether SEPP33 applies to the proposed Mulford Plastics warehouse located within the OIE.

1.3 SCOPE OF WORK

The scope of work is for a SEPP33 assessment of the proposed Mulford Plastics Warehouse storage at located within the OIE. The scope is for the assessment of SEPP33 application to the proposed warehouse only and does not include the preparation of additional documentation (e.g. Preliminary Hazard Analysis), should SEPP33 apply to the site.

2 METHODOLOGY

The following assessment approach was applied:

- A list of materials proposed for storage and handling within the warehouse was reviewed;
- From the materials list, a sub-list of Dangerous Goods was developed, along with the quantities
 of DGs proposed for storage at the facility;
- "Applying SEPP33 Hazardous and Offensive Developments" (Ref.1) was then reviewed to identify to which of the DGs SEPP33 applied;
- Threshold values were then listed alongside the quantities of DGs, to which SEPP33 applied, and comparisons made to determine the application of the policy;
- A draft report was then developed for review and comment by Goodman;
- A final report was then completed incorporating changes for points of fact in the draft report.

3 DANGEROUS GOODS STORED

The warehouse will be used for the storage of retail products with a minor portion of products being stored containing Dangerous Goods. **Table 3-1** provides a summary of the classes and quantities of DGs that will be stored within the warehouse.

Table 3-1: Dangerous Goods Classes and Quantities

CLASS	PG	DESCRIPTION	QUANTITY (KG OR L)
3	II & III	Flammable liquids	141 L

The DGs will be stored within the warehouse area itself following the requirements of the Work Health and Safety Regulation (2011, Ref.2) and AS3833-2007 (Ref.3).

4 SEPP33 ASSESSMENT (PRELIMINARY RISK SCREENING)

4.1 SEPP33 GUIDELINES

Due to the storage and handling of DGs, it is necessary to perform an analysis of the type of DGs and, in some cases, the quantity of DGs stored to determine whether SEPP33 applies to the site.

The DPE has issued a document "Applying SEPP33" (Ref.1) that provides guidelines on which DGs are subject to SEPP33 and the maximum permissible threshold quantities for those DGs to the policy applies. **Table 4-1** has been developed from Table 3 from "Applying SEPP33" (Ref.1), which indicates the maximum permissible threshold quantities for the various DGs.

Table 4-1: SEPP33 Thresholds for DG Classes

CLASS	THRESHOLD QUANTITY (TONNE)	
3	5*	

^{*} Above 5 tonne flammable liquids are assessed based on distance and quantity.

Provided in **Table 4-2** is a comparison of the DG quantities that will be stored in the Mulford Plastics warehouse compared to the applicable thresholds for individual DG classes. In addition, an assessment is provided indicating whether the quantity is exceeded. It is noted, that where the quantity has been expressed in litres, a density of 1000 kg/m³ has been assumed. This assumption is considered conservative as this density exceeds the true density of the materials stored.

Table 4-2: SEPP33 Assessment

CLASS	THRESHOLD QTY (TONNE)	STORED (TONNE)	ASSESSMENT
3	5	0.141	Below

A review of **Table 4-2** indicates that the quantity of flammable liquids is below the SEPP33 threshold, therefore, SEPP33 is not exceeded.

5 CONCLUSIONS

Based on the analysis conducted in this SEPP33 study for the proposed Mulford Plastics Warehouse at the OIE, NSW, it is identified that the quantities of DGs proposed for storage and handling at the warehouse do not exceed the maximum permissible threshold quantities listed in Applying SEPP33 (Ref.1).

It is therefore concluded that SEPP33 does not apply to the proposed Mulford Plastics Warehouse located within the OIE, NSW; hence, the facility is not considered potentially hazardous and no further assessment is required.

6 REFERENCES

- 1. Applying SEPP33 Hazardous and Offensive Developments (2011), NSW Department of Planning and Environment, Sydney
- 2. Work Health and Safety Regulation 2011, under the Work health and safety Act (2011), SafeWork NSW, Lisarow, NSW
- 3. AS3833-2007, The storage and handling of mixed classes of Dangerous Goods in packages and intermediate bulk containers, Standards Association of Australia, Sydney.