

File Ref. No: BFS15/1786 (9105)
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Contact: Station Officer Mark Castelli

11 November 2015

Attention: Pamela Morales

Dept. of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

E: Pamela.Morales@planning.nsw.gov.au

Dear Madam,

**RE: STATE SIGNIFICANT DEVELOPMENT APPLICATION
VOPAK SITE, B4 PROJECT (SSD 7000)**

I refer to your correspondence dated 15 October 2015 in regards to the above project. Fire and Rescue NSW (FRNSW) note that we have been invited by the Department of Planning & Environment (DPE) to comment upon the above proposal (including advice on recommended conditions of consent).

The relevant details of the Environmental Impact Statement (EIS) FRNSW assessed are:

- EIS prepared by Simon Murphy of AECOM;
- EIS dated 9 October 2015; and
- EIS reviewed by Mr Scott Jeffries.

FRNSW has reviewed the EIS and within the context of participating in an integrated assessment process for safety assurance of the development the following recommendations are submitted for consideration.

Recommendations

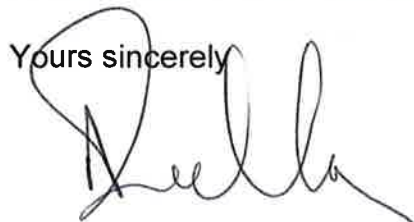
1. That the project proponents be required to undertake a fire safety study (FSS) of the proposed development and that the study is developed in accordance with the requirements of Hazardous Industry Planning Advisory Paper Number 2 (HIPAP No.2).
2. That the FSS is required to be approved by FRNSW.
3. To ensure efficient assessment and cost effective project management efficiencies it is important that the FSS be developed in consultation with FRNSW prior to the FSS being finalised. Therefore it is recommended that the proponent consultants be required to liaise with FRNSW prior to the FSS being commenced.
4. That the scope of the FSS be widened to not only include the analysis of hazards associated with the B4 Project but also expansion works associated with the provision of extra road tanker bays at Site B, the proposed increased discharge rates from berths BLB 1 & BLB 2 and interfacing of services with the existing Site B arising as a consequence of the development.
5. That the recommended fire protection control measures arising from the FSS analysis be developed from first principle evaluation rather than reliance on Australian Standard (AS) 1940, (i.e. as required by Section 2.1 of HIPAP No.2).
6. That the FSS assessment be undertaken concurrently to assess hazards and risks associated with both stages of the project, (i.e. a holistic analysis of Stage 1 [B4A] and Stage 2 [B4B] rather than two separate FSS being developed for each stage).
7. That fire detection/protection systems requirements arising from the FSS analysis for Stage 1 [B4A] of the development and which will be common to Stage 2 [B4B] are implemented as part of Stage 1 works, (e.g. the hydraulic performance of on-site fire service pumps).
8. It is noted that the site will be a 24/7 operation, it is FRNSW experience that on-site staff numbers for similar sites reduce significantly outside of normal business hours. FRNSW therefore recommends that the analysis of required fire protection systems includes substantiation of effective and timely system initiation/activation with regard to the number of on-site personnel available at all hours of business operations.



FRNSW notes that Section 9.2 and Table 14 of the EIS states that FRNSW did not provide a response during the agency consultation process undertaken as required by the SEARs. FRNSW highlights that we do not have a record of any such request being received. For future reference FRNSW advises that all requests for similar consultation should be made through FRNSW Fire Safety Assessment Unit (bfs@fire.nsw.gov.au).

FRNSW thanks the DPE for the opportunity to comment upon the EIS. For further information please contact Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS15/1786 (9105). Please ensure that all correspondence in relation to this matter is submitted electronically to bfs@fire.nsw.gov.au.

Yours sincerely



Superintendent Mark Reilly AFSM CMIFireE
Manager
Fire Safety Assessment Unit

Copies to:

Superintendent Darryl Dunbar
Zone Commander MS2
CC: Darryl.Dunbar@fire.nsw.gov.au

Station Officer Kathryn Barnes
FRNSW Major Hazard Officer
SafeWork NSW
CC: Kathryn.Barnes@safework.nsw.gov.au

