State Environmental Planning Policy No. 33

Lot 8, 585-649 Mamre Road

IMCD Australia Limited
Document No. Q17-111_IMCD_FinalSEPP33_12Jun18_Rev(0)
Date 12/06/2018

State Environmental Planning Policy No. 33

Lot 8, 585-649 Mamre Road

IMCD Australia Limited

Prepared by

RiskEng Pty Ltd
19/5 Pyrmont Bridge Road
Camperdown NSW 2050
www.riskeng.com.au
ABN 26 611 315 792

Quality Management

Revision	Date	Remarks	Prepared By	Reviewed By
A	8 June 18	Issued draft for comment	Renton Parker	Steve Sylvester
0	12 June 18	Issued Final		

Table of Contents

Figures

Abbreviations

Abbreviation	Description
ADG	Australian Dangerous Goods Code
DG	Dangerous Goods
PHA	Preliminary Hazard Analysis
SEPP 33	State Environmental Planning Policy No. 33

Executive Summary

Background

IMCD Australia Limited (IMCD) has proposed to develop a new site at Lot 8 585-649 Mamre Road, Orchard Hills. The facility will store and handle a range of materials with some classified as Class 9 Dangerous Goods. As part of the Development Application, it is necessary to prepare a State Environmental Planning Policy No. 33 (SEPP 33) report as DGs may be stored at the site. If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Austral has engaged RiskEng Pty Ltd to prepare the SEPP 33 for the site.

Conclusions

A review of the quantities of DGs stored at the proposed warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facilty as SEPP 33 does not apply

1.0 Introduction

1.1 Background

IMCD Australia Limited (IMCD) has proposed to develop a new site at Lot 8 585-649 Mamre Road, Orchard Hills. The facility will store and handle a range of materials with some classified as Class 9 Dangerous Goods. As part of the Development Application, it is necessary to prepare a State Environmental Planning Policy No. 33 (SEPP 33) report as DGs may be stored at the site. If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Austral has engaged RiskEng Pty Ltd to prepare the SEPP 33 for the site.

1.2 Scope of Work

The scope of work is to prepare the SEPP 33 assessment for the IMCD site. Should any additional studies be required (i.e. PHA) these are not included, nor are any other IMCD sites included within the scope of work.

2.0 Methodology

2.1 General Methodology

The methodology used in this assessment is as follows:

- Review the types and proposed quantities of DGs to be stored at the site.
- Compare the quantities of DGs the threshold quantities listed in "Applying SEPP 33 – Hazardous and Offensive Development" (Ref. [1]) to identify whether the storage location or quantity triggers SEPP 33.
- Review the likely vehicular movements as a result of DGs being stored and compared against the applicable thresholds detailed in Applying SEPP 33 (Ref. [1]).
- Report on the findings of the SEPP 33 assessment.

2.2 Data taken from "Applying SEPP 33"

Figure 2-1, extracted from "Applying SEPP 33" provides details on the application of Figures or Tables from the same document to determine the applied screening Threshold.

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
LPG (underground)	table 3
2.3	table 3
3PGI	Figure 8 graph if greater than 2 tonne
3PGII	Figure 9 graph if greater than 5 tonne
3PGIII	Figure 9 graph if greater than 5 tonne
4	table 3
5	table 3
6	table 3
7	table 3
8	table 3

Figure 2-1: Screening Method to be Used

Table 3 from "Applying SEPP 33" has been extracted and is shown in **Figure 2-2**.

Class	Screening Threshold	Description
1.2	5 tonne	or are located within 100 m of a residential area
1.3	10 tonne	or are located within 100 m of a residential area
2.1	(LPG only — not including automotive retail outlets')	
	10 tonne or16 m^3	if stored above ground
	40 tonne or 64 m^3	if stored underground or mounded
2.3	5 tonne	anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale
	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
	2.5 tonne	chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg
	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
4.2	1 tonne	
4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated
		pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Note: *The classes used are those referred to in the Australian Dangerous Goods Code and are explained in Appendix 7.*

Figure 2-2: General Screening Threshold Quantities

Provided in **Figure 2-3** is the transport thresholds relevant to each of the classes.

	Vehicle Movements		Minimum quantity* per load (tonne)	
	Cumulative	Peak		
Class	Annual *or*	Weekly	Bulk	Packages
1	see note	see note	see note	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	10	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	2	5
6.1	all	all	1	3
6.2	see note	see note	see note	
7	see note	see note	see note	
8	>500	>30	2	5
9	>1000	>60	no limit	

Figure 2-3: Transport Thresholds

3.0 SEPP 33 Review

3.1 Proposed Storage Details

The site will store a range of products including Non-DG, combustible liquids and Class 9 DGs. The storage information provided does not identify each component; however, the total mass of all products stored is 1,750,000 kg.

3.1.1 Classification of Stored Products

The Australian Dangerous Goods Code (ADG, Ref. [2]) provides a list of materials which are classified as DGs under the requirements of the code. A review of the individual components indicates the only DG classification present is Class 9; however, these products are only classified as DGs during transport.

While combustible liquids and Class 9 DGs are stored, these are not subject to SEPP 33. In addition, non-DG products are not subject to SEPP 33. Therefore, these products are not carried forward for further analysis. As no additional analysis is required, SEPP 33 does not apply; hence no further assessment is required.

3.1.2 Transport

The facility will store DGs as part of their operations and quantities stored are far below SEPP 33 limits. The site will distribute products; hence, it is necessary to review the potential transport may have on the risk profile of the site.

Conservatively assuming transport occurs in single trucks capable of storing 20 tonnes of product, exceeding the SEPP 33 threshold for Class 9s of 60 movements per week would result in turnover of 1,200 tonnes each week. The warehouse has an absolute maximum storage of product of 1,750 tonnes of which, Class 9s are a minor component when compared the bulk of non-DG products. Therefore, it is considered unlikely that in the most conservative case, sufficient turnover would occur to exceed the SEPP 33 transport thresholds.

Therefore, the transport limits defined in SEPP 33 would not be expected to be exceeded based on the site operations; hence, transport as not been considered further.

4.0 Conclusion and Recommendations

4.1 Conclusions

A review of the quantities of DGs stored at the proposed warehouse and the associated vehicle movements was conducted and compared to the threshold quantities outlined in Applying SEPP 33. The results of this analysis indicates the threshold quantities for the DGs to be stored and transported are not exceeded; hence, SEPP 33 does not apply to the project.

As the facility is not classified as potentially hazardous, it is not necessary to prepare a Preliminary Hazard Analysis for the facilty as SEPP 33 does not apply

5.0 References

[1] SafeWork NSW, “Work Health and Safety Regulation,” SafeWork NSW, Lisarow, 2017.

[2] Department of Planning, “Applying SEPP 33,” Department of Planning, Sydney, 2011.

[3] National Transport Commission (NTC), “Australian Code for the Transport of Dangerous Goods by Road & Rail, 7th Edition,” 2011.