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ERM Reference: P00497058

Dear Guy

**Subject: SEPP33 Risk Screen for St Marys Freight Hub**

## 1 Introduction and Background

Environmental Resources Management Australia Pty Ltd (ERM) was appointed by Pacific National Pty Ltd to provide Guy Evans, a risk screening assessment via State Environmental Planning Policy 33 (SEPP33). The SEPP33 assessment has been prepared to consider whether the St Marys Freight Hub 'facility' should be considered a hazardous or potentially hazardous industry.

SITE Design + Planning and UrbanCo are preparing to lodge a Development Application and complete an Environmental Impact Statement to account for the NSW Department of Planning & Environment's requirements. The 'Department' issued a revised Secretary's Environmental Assessment Requirements (SEARs) response on 23 October 2018 that requested a SEPP33 risk screening assessment in section 17.

The risk screening methodology provided by the Department of Planning document *Hazardous and Offensive Development Application Guidelines - Applying SEPP33 (2011)*, has been applied and this report presents the details of the determination of the proposed facility.

Industries or projects determined to be hazardous or potentially hazardous will further require the preparation of a Preliminary Hazard Analysis (PHA) in accordance with Clause 12 of SEPP33. No further assessment under SEPP33 is required for projects not considered potentially hazardous following a SEPP33 risk screen.

The St Marys Freight Hub's preliminary environmental assessment has been reviewed to identify activities that involve hazardous materials on site. Additional data on site operations, traffic movements, site plans and layouts were also reviewed for the risk screening report.

## 2 Hazardous Materials used at the Facility

Hazardous materials have been classified in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (Dangerous Goods Code).

**Table 1: SEPP33 Screening Thresholds**

Material	Class	Description	Storage Quantity	Location	Distance to boundary	Threshold limit	Threshold triggered
Diesel fuel	Class 3C1	Combustible liquid: flashpoint above 61 C but not exceeding 150 C	30,000 L	Above ground bunded fuel tank	25m	100,000 kg or L	No
Lubricating oils and greases	Class 3C2	Combustible liquid: flashpoint above 150 C	1,000 kg	Workshop area	25m	10,000 kg or L	No
Engine Degreasers	Class 8	Corrosive liquids	100 kg	Washbay / workshops	40m	10,000 kg or L	No
High pressure soap/foams	NA	Surfactants	1,000 kg	Washbay	40m	NA	NA

The critical locations within the fuel storage in terms of screening for diesel are the location of the dispenser/pump positions and the tank fill points with respect to the site boundary. The shortest distance to a site boundary is 25m between a fuel dispenser and the eastern boundary. The fill point is approximately 30m from the closest boundary (eastern side) that is currently used for industrial activity.

The 2011 Guidelines specify minimum distance for potentially hazardous locations in Figure 9 for class 3PGII and 3PGIII chemicals (e.g. petrol and diesel) for screening purposes. Considering a total effective volume of 30,000 litres and a minimum distance of 25m from the adjoining property, the proposal is not considered potentially hazardous for surrounding sensitive or commercial uses.

The truck wash bay will use a range of surfactants (high pressure soaps, high foaming detergents) that will not attract a hazardous material classification. Small quantities of corrosive engine degreaser have been included and will not exceed a DG Class 8 threshold.

### 3 Information to identify other risk factors

The proposed site activities of container loading/unloading, container storage and transport, wash bay, fuel storage, workshop have been considered against the following:

#### Material Compatibility

Planned site operations have not identified any incompatible material scenarios. Hazardous materials, reactive materials and unstable substances have been considered.

#### Waste

Neither the construction or operation phases of the project have identified the production of any significant hazardous waste generation. Both the construction phase and day to day operations

will be controlled by individual waste management plans that will identify waste streams and servicing arrangements ie truck wash bay.

#### Temperature

Planned site operations have not identified any activities creating risk from high or extremely low temperatures and/or pressures.

#### Fuel Storage

The proposal details a diesel fuel storage area to support the heavy vehicle operations. The fuel storage will be a 30,000 litre above ground tank located on the eastern side of the container operations and will be contained by approved bunding. The design will not require the *Protection of the Environment (Underground Petroleum Storage Systems) Regulation 2014* to be addressed.

#### Substances within Intermodal Containers

The Traffic and Transport Assessment by Bitzios Consulting projects an operating capacity of 436 daily vehicle movements on the site for all freight types. Analysis of the previous 12 months of freight container data indicate that an average of 4 movements per day will involve a freight container transporting a material that is classified as a hazardous substance.

The 'intermodal' nature of operations conducted at the facility involves the transportation of freight in a container without actually handling the freight itself. It is merely the mode of transport itself that changes. Risks associated with transporting these substances are currently controlled by the Australian Code for the Transport of Dangerous Goods by Road and Rail (Dangerous Goods Code).

Materials already within the transport routes that enter the St Marys Freight Hub, will be required to be ADG Code compliant ensuring correct segregation, packaging, labelling and storage. Hazardous materials within intermodal containers (approx. 1%) will not be accessible by site activities as they are not opened, repacked, consolidated or re-segregated.

## **4 Offensive Industry**

The risk screening and the Preliminary Environmental Report has not identified any activities that will be potentially offensive or require pollution control licencing under Schedule 1, POEO Act.

The Environment Protection Authority (EPA) has previously reviewed the sites earlier proposal for Western Sydney Container Terminal Facility in 2015 and did not consider that that proposal would require an Environment Protection Licence (EPL) under the POEO Act. The EPA are yet to conduct their review on this proposal and will supply comment when the full Environmental Impact Statement is lodged.

## **5 SEPP33 Determination**

The quantity of diesel fuel to be transported to and stored within the facility does not trigger the threshold contained in the 2011 Guideline and therefore is not required to be considered further. The diesel fuel (Class C1) and lubricating oils and greases (Class C2) will not be stored adjacent to any other hazardous materials, also not requiring further consideration by the Guideline.

Approximately 1% of the sealed intermodal containers moving through the freight operations hub will likely be transporting a classified substance under the Australian Code for the Transport of

Dangerous Goods by Road and Rail (Dangerous Goods Code). The risk controls in place by these regulations to manage transport of these materials within intermodal containers into and out of the facility will not be compromised by the proposed sites activities of freight forwarding by changing transport modes.

A preliminary hazard analysis has not been prepared on the basis that the identified hazardous materials used at the site have not exceeded the risk screening thresh-holds.



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