FAIRFIELD CITY COUNCIL

STATE ENVIRONMENT PLANNING POLICY (SEPP) 33- PRELIMINARY SCREENING AND HAZARD ASSESSMENT

FAIRFIELD SUSTAINABLE RESOURCE CENTRE EXPANSION

MAY 2020



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State Environment Planning Policy (SEPP) 33- Preliminary Screening and Hazard Assessment

Fairfield Sustainable Resource Centre Expansion

Fairfield City Council

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1 INTRODUCTION

Fairfield City Council covers 102 km² in the south-western Sydney metropolitan area and serves approximately 205,000 residents. The Fairfield Sustainable Resource Centre (SRC) is a Council-operated recycling centre which accepts waste building material comprising terracotta, brick, concrete and asphalt and supplies aggregate, sand, topsoil and crushed concrete for construction and landscaping. The SRC has been in operation since 1997 and processes more than 180,000 tonnes of material per year.

It is understood that the Council intends to expand the SRC into an area covering approximately 2 hectares (ha) to the east of the currently licensed SRC area, including constructing a road (Canal Road) between the current facility and the proposed expansion by filling in a gully (located on Lot 100 in Deposited Plan (DP) 1220637).

It is understood that the purpose of the work is to confirm inventory and types of dangerous goods that will be stored and handled on-site during the proposed expansion works and undertake a preliminary risk screening and, if required, a preliminary hazard analysis (PHA) in accordance with NSW State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) criteria.

The proposed expansion works on-site is subject to the *Work Health and Safety Regulation 2017* (NSW) and the *Work Health and Safety Act 2011* (NSW). It is noted that the proposed expansion works is the holder of a variation to NSW environment protection licence, requiring the SRC to assess for waste management, air and noise pollution, soil and water pollution impacts. The proposed expansion is required to fulfil Secretary's Environmental Assessment Requirements (SEARs – SSD 8184) by the NSW Department of Planning (reissued on 6 May 2019).

Since the 1980s, the New South Wales Department of Planning has adopted an integrated assessment process for safety assurance of development proposals that are potentially hazardous.

The current facility and the proposed expansion of SRC will be storing and handling 10,000 litres of diesel (Class C1/Category 4 Class 3 liquid), a combustible liquid. As diesel fuel is not listed on the SEPP 33 screening threshold, *Work Health and Safety Regulation 2017* (NSW), Chapter 7 Hazardous Chemicals) manifest quantity - notification threshold (maximum of 100,000 litres), is applied.

The proposed SRC expansion works is of a low risk hazardous and/or offensive operation because there are no dangerous goods other than 10,000 litres of diesel fuel (C1 or Category 4 Flammable Liquid) currently stored and handled on-site. Other potential pollution impacts are addressed as part of Environmental Impact Statement (EIS) required under the SEARs and variation of the site Environment Protection Authority (EPA) licences.

2 SCOPE OF REPORT

2.1 SEPP 33

This Preliminary Risk Screening assessment forms part of the supporting documentation for the Development Application (DA) for the Proposal in accordance with Secretary's Environmental Assessment Requirements (SEARs), reissued in May 2019, which required the following in relation to Land Use Safety:

A preliminary risk screening completed in accordance with Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines (DoP 2011). Should the screening indicate that the development is "potentially hazardous", a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011). The PHA should estimate the cumulative risks from the existing and proposed development.

The purpose of this report is to provide a screening assessment of the hazards associated with the storage of dangerous goods on the site in accordance with SEPP 33. The purpose of the initial SEPP 33 risk screening is to exclude from more detailed studies those developments which do not pose significant risk.

Where SEPP 33 identifies a development as potentially hazardous and/or offensive, developments are required to undertake a PHA to determine the level of risk to people, property and the environment at the proposed location and in the presence of controls.

If the risk levels exceed the criteria of acceptability and/or if the controls are assessed as inadequate, or unable to be readily controlled, then the development is classified as 'hazardous industry'. Where it is unable to prevent offensive impacts on the surrounding land users, the development is classified as 'offensive industry'. Both of these classifications may not be permissible within industrial zones in NSW.

A development may also be considered potentially hazardous with respect to the transport of dangerous goods. A proposed development may be potentially hazardous if the number of generated traffic movements (for significant quantities of hazardous materials entering or leaving the site) is above the cumulative annual or peak weekly vehicle movements. Table 2 in the document *Applying SEPP 33: Hazardous and Offensive Development Application* (Department of Urban Affairs and Planning (DUAP; now Department of Planning and Environment), 1994) and Guidelines (NSW Planning) 2011, outlines the screening thresholds for transportation.

This report presents information on hazardous materials, flammable substances, and compressed or liquefied gases proposed to be stored or handled in the Development Site, including on site or transported to or from the site, including any associated risk issues.

This report forms part of an Environmental Impact Statement which will be submitted to the Department of Planning and Environment as a State Significant Development.

3 SURROUNDING LANE USES AND ZONING

Under the provision of the *Fairfield Local Environmental Plan 2013* (LEP), the Development Site is zoned IN1 General Industrial as is the land surrounding the site (see Figure 1). The proposed site use is as a recycling centre and internal roadway.

The surroundings are characterised by a mix of industrial developments including factories, automotive servicing, quarrying, recreational sports fields, hardware and general supplies, manufacturing and warehousing (refer to Table 1). The industrial nature of the surrounding developments means they would not be considered as sensitive in the way that an office, school or hospital would be. The nearest residential receivers are located 1.13 km to the south-east. Measurement are taken from the centre of the existing building on site.

Table 3.1 Neighbouring properties and land uses

DIRECTION	DISTANCE (APPROX)	OPERATION	USE OF LAND
West	111 m	Steel and wood manufacturing,	Industrial
South	132 m	Manufacturing, driving school	Industrial
North	763 m	Boral Quarries	Quarrying
East	938 m	Gipps Road Sporting Complex	Recreational
	1.12 km	Manufacturing, vehicle repair	Industrial
North-east	829 m	Transgrid Substation	Infrastructure
	1.15 km	Housing (Chifley Street, Wetherill Park)	Residential
South-east	291m	Laboratories, manufacturing	Industrial
	1.13 km	Housing (Munro Street, Greystanes)	Residential
South-west	162 m	Metromix Concrete Batching Plant	Industrial
North-west	150 m	Sterilisation/recycling processor	Industrial

4 PRELIMINARY RISK SCREENING

4.1 OVERVIEW

Preliminary risk screening of the proposed development is required under SEPP 33 to determine the need for a PHA. The preliminary screening assesses the storage of specific dangerous goods classes that have the potential for significant off-site effects. Specifically, the assessment involves the identification of classes and quantities of all dangerous goods to be used, stored or produced on site with respect to storage depot locations as well as transported to and from the site.

4.2 DANGEROUS GOODS STORAGE

The proposed inventory of dangerous goods (DG) in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Code) is provided in Table 2 below. The information contained in the table compares the total storage quantity of the required dangerous goods classes against the storage screening threshold in Table 3, and Figure 9 of Applying SEPP 33 (DUAP (1994), and updated guidelines, NSW Planning, 2011). The dangerous goods to be stored on the site were grouped into their respective ADG classes. If more than one packaging group was present in an ADG class, it was assumed that the total amount for that class was the more hazardous packing group.

Table 4.1 Dangerous goods classes in storage (current and proposed)

SUBSTANCE	HAZARD CLASS	PACKING GROUP	TOTAL STORAGE ON SITE		QUANTITY	SEPP 33 THRESHOLD FINDING
Diesel	3*	III*	10,000 L (tank)	0 L	Not applicable if stored separately	BELOW

^{*}Diesel is a class C1 combustible liquid and considered to be not potentially hazardous if stored in a separate bund or within a storage area where it is the only combustible liquid present.

The current and proposed dangerous goods planned to be stored on site are below the screening thresholds or are not applicable and therefore not considered potentially hazardous.

4.3 DANGEROUS GOODS TRANSPORT

In applying SEPP 33 a proposed development may be deemed potentially hazardous if the numbers of generated traffic movements for significant quantities of dangerous goods entering and leaving the site, are above the cumulative vehicle movements shown in Table 2 of the SEPP 33 guideline. The levels of maximum proposed movements at the site per week are provided below in Table 3. Note that the annual levels directly reflect the weekly vehicle movements.

Table 4.2 Dangerous goods vehicle movements (current and proposed)

SUBSTANCE	ADG CLASS	MAXIMUM DGS VEHICLE MOVEMENTS (PER WEEK)	SEPP 33 THRESHOLD VEHICLE MOVEMENTS (PER WEEK)	THRESHOLD	TYPE (RELEVANT TO	SEPP 33 THRESHOLD LEVEL FINDINGS
Diesel	N/A	<1	N/A	N/A	Bulk (tank)	BELOW

The site needs are substantially below any SEPP 33 thresholds on both load quantity and weekly movement thresholds.

Note: Diesel is not a dangerous good for the purposes of transport (AU02 - ADGC 3.3.3) however for reporting purposes vehicle movements will be ≤ 1 per week.

5 CONCLUSIONS

5.1 RISK MITIGATION MEASURES (DEVELOPMENT)

The following risk mitigation measures are recommended:

- Storage and handling of diesel fuel on-site compliant with dangerous goods storage and handling requirements (refer to Appendix A for a detailed risk assessment)
- Exposure to dust: respiratory protection for construction and operation workers
- Exposure to hazardous materials such as lead and asbestos, respirable/inhalable lead and other dusts hazardous
 materials survey register will be prepared by the construction and demolition contractors, baseline occupational
 hygiene monitoring and appropriate respiratory protection for workers during demolition and construction and water
 spraying to control off-site migration of dusts as required
- Off-site migration of soil and groundwater pollutants construction environmental management plan will adequately address contamination risks
- Appropriate air quality, noise and vibration and waste management mitigation and control measures to be identified and implemented as part of the EIS.

5.2 FINDINGS

The proposed expansion of SRC by the Fairfield City Council does not trigger SEPP 33 threshold criteria for potentially hazardous industry with regards to the type and quantity of dangerous goods being stored and handled during the expansion works or transport of dangerous goods to and from site. Therefore, the proposed expansion does not require a PHA to be undertaken.

The proposed expansion of SRC will continue to store and handle 10,000 litres of diesel (Class C1/Category 4 Class 3 liquid), a combustible liquid. As diesel fuel is not listed on the SEPP 33 screening threshold, *Work Health and Safety Regulation 2017* (Chapter 7 Hazardous Chemicals) manifest quantity - notification threshold (maximum of 100,000 L) is applied. The site currently holds 10,000 L is this is not expected to change for the new development.

The proposed SRC expansion works is of a low risk hazardous and/or offensive operation because there are no dangerous goods other than the existing 10,000 L of diesel fuel (C1 or Category 4 Flammable Liquid) stored and handled on-site and other potential pollution impacts are addressed as part of the EIS required under the SEARs and variation of the site EPA licences.

The proposed SRC expansion may fall under potentially offensive category due to emissions to air, water and soil/wastes if uncontrolled, however this is outside the SEPP 33 reporting requirement. For developments identified as 'potentially offensive industry', the minimum test for such developments is meeting the requirements for licensing by the NSW EPA or other relevant authority, which is being achieved by providing an EIS to meet SEARs requirements.

Therefore, a qualitative hazard and risk assessment has been undertaken and presented in Appendix B and the residual risks are demonstrated to be as low as reasonably practicable (ALARP).

The risk assessment process is intended to be continuous, carried forward throughout the different phases of the Project. This preliminary risk assessment has provided a framework for further detailed hazard identification and risk analysis, evaluation and treatment.

6 LIMITATIONS

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The scope of services did not include any assessment of the title to nor ownership of the properties, buildings and structures referred to in the report, nor the application or interpretation of laws in the jurisdiction in which those properties, buildings and structures are located.

WSP have qualitatively assessed the hazards and control measures based on the information provided by remediation consultants and specialist studies in relation to storage and handling of dangerous goods for the proposed expansion works at Fairfield SRC. Please note that the report and findings are not a substitute for full compliance with Australian Standards and Codes of Practice. Fairfield SRC as the owner and operator of the facility shall ensure that they maintain their duty of care and consult the relevant legislation and guidelines. Should the remediation conditions or treatment volumes change, the contents and findings in the report shall be reviewed, and the risks associated with any change assessed and controlled.

BIBLIOGRAPHY

NSW Work Health and Safety Regulation, 2017

Commonwealth Government, 2018, Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Number 7.6).

Department of Urban Affairs & Planning, 1994, State Environmental Planning Policy No.33- Hazardous and Offensive Development, New South Wales Government.

Planning NSW, 2011, Guidelines in Applying SEPP 33, New South Wales Government.

Planning NSW, 2011 Risk Criteria for Land Use Safety Planning – Hazardous Industry Planning Advisory Paper No 4, New South Wales Government

Planning NSW, 2011 Hazard Analysis – Hazardous Industry Planning Advisory Paper No 6, New South Wales Government

APPENDIX A

RISK ASSESSMENT – DIESEL STORAGE AND HANDLING



A1 DIESEL HANDLING AND STORAGE

Risk Assessment Do	etails							
ChemAlert Colour								
Rating:	Amber							
Sub-Category, if								
necessary: (e.g.	Combustible Liqui	id C1 Catagory 1	Elammable Liquid as nor					
aerosols, paints,	Globally Harmoni		Flammable Liquid as per					
solvents, adhesives) Product Name(s):	Globally Harriottis	Work Activity:	Location of Fairfield SRC					
Product Name(s):		(list typical	Expansion Site					
		work activities	Expansion Site					
		associated						
		with each						
		product name)						
Diesel Fuel - Autom	notive Diesel Oil	Two Above	Corner of Hassall Street					
Dieserraer-Auton	lotive Dieser On	Ground	and Widemere Road,					
		Storage Tanks	Wetherill Park, New South					
		- each 5,000	Wales 2164					
		Litres fill	770.63 220 1					
		capacity - total						
		10,000 Litres						
		20,000 2.0.03						
Date of								
Assessment:	20 October 2017							
Assessor(s):	Name: V.	Position: Associa	ate, WSP Australia Pty Ltd					
, ,	Narayanaswamy		,					
Name: Nathan		Position: Techni	cal Executive, EHS (2020					
	Redfern	revision)	. ,					
Committee or	Name: Mr Ross	Position: Manag	er Waste and Sustainability					
HSR Review:	Smith	at Fairfield City	Council					

etrieved from SDS)	
Liquid	Note: consider how the chemical is going to
Yes	be used, in what work environment, what
Yes	kind of processes will it be exposed to (heat,
Yes	pressure), will smaller volumes reduce the
	risk, what kind of tooling and equipment will
Yes	be nearby, what kind of outside elements
V	may be exposed to the chemical
Yes	If no, explain: Stable under normal
	conditions of storage and handling.
Yes	If yes, explain: Reacts with incompatible
	materials such as organic peroxides and
	strong oxidising agents
Yes	If yes, explain: Reacts with incompatible
	materials such as organic peroxides and
	strong oxidising agents to produce toxic and
	irritating gases such as sulphur dioxide,
	oxides of nitrogen, and suffocating gases
	such as carbon monoxide and carbon dioxide
Yes	If yes, explain: Avoid heat, sparks, open
	flames and other ignition sources.
Yes	If an addition Change Of Mining Assessed
	If yes, explain: Strong Oxidising Agents
Yes	If yes, explain: Under fire conditions this
	product may emit toxic and/or irritating
	fumes, smoke and gases including carbon
	monoxide, carbon dioxide and oxides of
	nitrogen.
	Yes

Ref	TASK	Initial Risk Assessment	IDENTIFIED CONTROL(S)	Residual Risk Assessment

		HEALTH & SAFETY RISKS AND ENVIRONMENTAL IMPACTS	Likelihood	Consequence	Risk Rating		Likelihood	Consequence	Risk Level
1 Storage (new and waste material)	Release of diesel vapours from the vent, flanges, seals, etc. due to exposure to high ambient temperatures during summer days	4. Probable	2. Minor	Medium	Keep the tanks under a roof, or under a shade avoiding direct sunlight Hazardous Area Classification for Electrical Equipment in and around the diesel storage; Flange or/Valve wrappings; Routine Inspection and Maintenance; Locating the height of the vents higher enough in the open environment for quicker dispersion and dilution of vapours.	2. Unlikely	2. Minor	Low	
	combustibles near t due to hot works or other ignition sourc	Fire due to ignition of combustibles near the tanks due to hot works or due to other ignition sources such as electrical sparks, etc.	4. Probable	3. Moderate	High	Vegetation clearing around 3-5 m from the tanks; Segregation from combustibles comply with AS 1940; Approved storage tanks with 1 powder/foam type extinguisher for each storage tank; Permit to Work system for Hot Works; Hazardous Area Classification or Electrical Equipment in and around the diesel storage; Lightning protection for the tanks; Earthing of the tanks and the pipework to prevent static discharges; Warning Signs for No-Smoking and No Open Flames within 3m from the tanks.	1. Rare	3. Moderate	Medium
		Spills, leaks, and accidental releases	3. Possible	2. Minor	Medium	Self bunded diesel tank; OR concrete bunding comply with AS 1940; double walled pipework OR pipework within the bunded area/spill collection tray	2. Unlikely	2. Minor	Low
		Inadequate Segregation of Diesel Tanks from incompatible	4. Probable	2. Minor	Medium	Clearance distance of 3 m surrounding the diesel storage	2. Unlikely	2. Minor	Low

materials and other combustible materials				tanks; clearing of vegetation around the tanks			
Stability of diesel due to tanks subjected to abnormal storage conditions	3. Possible	2. Minor	Medium	Routine Inspection and Testing; Emergency Response Procedures; Trained Staff and Fuel Suppliers	2. Unlikely	2. Minor	Low
Vehicular impact on the tanks	4. Probable	2. Minor	Medium	Bollards around the tanks; one- way loading vehicle entry and exit (no reversing of vehicles on-site); restricted motor vehicle access near the tanks	2. Unlikely	2. Minor	Low
Ignition sources in hazardous areas	4. Probable	2. Minor	Medium	Placarding and warning signage; Hazardous Area Classification in accordance with AS/NZS 60079.10.1; All electrical equipment in hazardous zones rated; No smoking and open flames area; Hot Work Permit system; Restricted Access	2. Unlikely	2. Minor	Low
Inadequate design, build, maintenance and location of the two above ground diesel storage tanks	4. Probable	2. Minor	Medium	AS 1940 compliant tanks - design and installation; API 653 compliant tanks inspection and maintenance regime	2. Unlikely	2. Minor	Low
Poorly designed and installed pipework	3. Possible	2. Minor	Medium	AS 1940 compliant tanks' pipework - design and installation; API 570/ASME B31.1 compliant pipework inspection and maintenance regime	2. Unlikely	2. Minor	Low
Inadequate separation distance from on-site and off-site protected places	4. Probable	2. Minor	Medium	Minimum separation distance of 3 m to other stores/offices on-site and property boundary	2. Unlikely	2. Minor	Low
Inadequate lighting causing impairment of sight and vision	4. Probable	2. Minor	Medium	Day time operations; Portable lights (intrinsically safe) for inspection and testing crew at night time	2. Unlikely	2. Minor	Low

		Inadequate access and egress space around the tanks	4. Probable	2. Minor	Medium	Above ground tanks located in open space under the shed. Plenty of space to move around; dedicated walkways and emergency exit pathways	2. Unlikely	2. Minor	Low
		Lack of dangerous goods labels, warning signs	4. Probable	2. Minor	Medium	Placarding and warning signage to comply with NSW WHS Regulation 2011; No smoking and no naked flames signage Hot Work Permit system; Restricted Access	2. Unlikely	2. Minor	Low
		Lack of preparedness for dangerous goods related emergencies	4. Probable	2. Minor	Medium	Site Emergency Response Plan; Trained Staff; Emergency Mock Drills and Exercises; Usage of Fire Protection Equipment Training	2. Unlikely	2. Minor	Low
		Dangerous goods incidents	4. Probable	3. Moderate	High	FCC-SRC Dangerous Goods and Hazardous Chemicals Incidents Investigation and Reporting and Corrective Actions Procedure; Near Miss Reporting; Dangerous Goods/Hazardous Chemicals Safety Observation; Routine DG/HAZ Chem audits and inspections	2. Unlikely	3. Moderate	Medium
		Unsecured sites - risk of vandalism	4. Probable	2. Minor	Medium	Secured site with restricted access; trained staff; site security and emergency response plan	2. Unlikely	2. Minor	Low
2	Decanting (accessing material transferring from larger to smaller container	Inhaling vapours (Inhalation of product vapours may cause irritation of the nose, throat and respiratory system)	4. Probable	2. Minor	Medium	Tanks located in an open naturally ventilated area, Face Mask and Full Face Air Respirator. Trained Staff. Decanting or diesel transfer with appropriate mechanical equipment (no manual handling allowed)	2. Unlikely	2. Minor	Low
	before use)	Explosion	3. Possible	3. Moderate	Medium	Earthing of pipework, and appliances, decant away from naked flame/spark, hazardous area protected equipment	1. Rare	3. Moderate	Medium

		Skin contact	3. Possible	3. Moderate	Medium	Appropriate PPE with long sleeve shirts and pants, impervious gloves (nitrile, viton), safety goggles, respiratory protection; Safety Shower and Eye Wash; Safe Operating Procedures; on the job training for raising awareness on hazards due to chemicals.	2. Unlikely	3. Moderate	Medium
		Static electric charges accumulation	5. Almost certain	3. Moderate	High	Anti-static additives to diesel; earthing and bonding of nozzles and containers whilst decanting; decanting in metal containers that are earthed.	2. Unlikely	3. Moderate	Medium
3	Use (mixing, method of application, and environment, for example: workshop, warehouse,	Chemical burn (not applicable) - Repeated exposure may cause skin dryness and cracking and may lead to dermatitis.	3. Possible	3. Moderate	Medium	Use in small amounts, nitrile viton gloves, face-shield, over-alls.	2. Unlikely	3. Moderate	Medium
		Injection (not applicable)	3. Possible	3. Moderate	Medium	Application tool with no sharp edges/points, cover sharp surfaces, wear cut and chemical-resistant gloves of suitable rating	2. Unlikely	3. Moderate	Medium
	confined space, outside)	Ingestion (May be fatal if swallowed and enters airways. Small amounts of liquid aspirated into the respiratory system during ingestion or from vomiting may cause severe pulmonary injury that may lead to death. May cause irritation to the mouth, throat, oesophagus and stomach with symptoms of nausea, abdominal discomfort, vomiting and diarrhoea.)	3. Possible	5. Catastrophic	Extreme	Appropriate PPE (face-shield/mask), On-site SOS, No manual handling (mechanical decanting or transfer); Operator Awareness and Training; On-site First Aid and Cardio Pulmonary Resuscitation (CPR) Trained emergency responders	2. Unlikely	3. Moderate	Medium

4	Clean-Up (collection of wasted material and transporting for disposal)	Slips and falls	3. Possible	3. Moderate	Medium	Clean as you go, use small amounts, barricade areas, safety shoes with oil/slip resistant soles.	2. Unlikely	3. Moderate	Medium
		Pollution	4. Probable	3. Moderate	High	Housekeeping, limit to indoor environment, spill containment, spill kits to clean up minor and major spills; barriers/filters.	2. Unlikely	3. Moderate	Medium
5	Disposal (proper disposal in waste container, for example: drum, bin, tank)	Chemical reaction	3. Possible	4. Major	High	ChemAlert reports, SDS review, training/instruction, segregation barriers, appropriate PPEs	2. Unlikely	4. Major	Medium
		Spill - loss of primary containment during fuel transfer or tank loading due to rupture of hoses, pipe burst/leaks, tank leaks	4. Probable	2. Minor	Medium	Disposal using funnels, pump system with hose, fill indicator, secondary containment tray, self bunded tanks, double walled pipes and collection tray underneath hoses, dry-break coupling; tanker loading area secondary contained with a sump for collecting spills; Large spills: full body suit of chemical resistant, antistatic material is recommended.	2. Unlikely	2. Minor	Low
		Uncleared decommissioned tanks and pipework	4. Probable	2. Minor	Medium	Tanks decommissioning plan to comply with FCC-SRC/ standards (AS 1940/API standard minimal); Empty Container Warning Labels and Instructions	2. Unlikely	2. Minor	Low
6	Transport	Chemical reaction	3. Possible	2. Minor	Medium	ChemAlert reports, proper hazardous waste labelling/containment, transportation to and from site by a licenced and registered contractor.	2. Unlikely	2. Minor	Low

Spill - transfer point diesel; transportatio	-	3. Moderate	Medium	Transportation to and from site by a licenced and registered contractor, spill kits available on site and with transporter. Camlock (dry break) coupling for the transfer points; supervised loading operation; dangerous goods safety trained and accredited driver; transport emergency response plan; Small spills: normal antistatic work clothes are usually adequate. Large spills: full body suit of chemical resistant, antistatic material is recommended.	1. Rare	3. Moderate	Medium
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