



RiskEng

State Environmental Planning Policy No. 33

97-103 Bowral St, Bowral

Bowral Hospital
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Quality Management

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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

Bowral Hospital is undergoing and upgrade at the site where an additional building is to be developed. As Part of the Secretary Environmental Assessment Requirements (SEARS) a State Environmental Planning Policy No. 33 (SEPP 33) report is required. If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Capital Insight, on behalf of Bowral Hospital, 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 facility 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 facility as SEPP 33 does not apply

1.0 Introduction

1.1 Background

Bowral Hospital is undergoing and upgrade at the site where an additional building is to be developed. As Part of the Secretary Environmental Assessment Requirements (SEARS) a State Environmental Planning Policy No. 33 (SEPP 33) report is required. If the assessment determines SEPP 33 to be exceeded, a Preliminary Hazard Analysis (PHA) is required to be submitted with the Development Application. Capital Insight, on behalf of Bowral Hospital, 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 Bowral Hospital. Should any additional studies be required (i.e. PHA) these are not 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 involving DGs and compare 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 3-3**.

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 or 16 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

3.0 SEPP 33 Review

3.1 Proposed Storage Details

The maximum quantities of products and DGs that are to be stored at the site, are shown in **Table 3-1**. The data has been taken from existing site operations.

Table 3-1: DG Classes or Materials Stored and Maximum Quantities

Class	Description	PG	Quantity (kg)
2.1	Flammable Gases	n/a	13.4
2.2	Non-flammable, non-toxic gases	n/a	260
3	Flammable Liquids	II & III	196
4.1	Flammable Solids	III	25
5.1	Oxidising Agent (gases)	n/a	250
5.2	Organic Peroxide	II	7.8
6.1	Toxic Substances	II	64
8	Corrosive Substances	II & III	183
9	Miscellaneous	III	10
C1	Combustible Liquid	n/a	5,000

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. The goods to be stored are classified as DGs by the ADG. Therefore, the materials classified as DGs are subject to the assessment requirements of SEPP 33. Class 2.2, 9 and combustible liquid are not subject to SEPP 33; hence, these items have been eliminated from further assessment.

3.2 Application of State Environmental Planning Policy No.33 – Hazardous and Offensive Developments

State Environmental Planning Policy No. 33 – Hazardous and Offensive Developments (SEPP 33) has been developed under the Planning and Assessment Act 1979 to control potentially hazardous and offensive developments and to ensure appropriate safety features are installed at a facility to ensure the risks to surrounding land uses is minimised.

The policy includes a guideline that assists government and industry alike in determining whether SEPP 33 applies to a specific development. The guideline, “Applying SEPP 33 - Hazardous and Offensive Developments” (Ref. [1]) provides a list of threshold levels, for the storage of DGs, above which the regulator considers the DG storage to be potentially hazardous. In the event the threshold levels are exceeded, SEPP 33 applies and a Preliminary Hazard Analysis (PHA) is required, followed by a series of hazard analysis studies stipulated by the Department of Planning and Environment in the conditions of consent.

3.2.1 Storage

Threshold limits for the application of SEPP 33 are presented in **Table 3-2** along with maximum DG quantities that will be stored. The results summarised in the table indicates the SEPP 33 criteria is not exceeded; hence, no further assessment would be required.

Table 3-2: Quantities Stored and SEPP33 Threshold

Class	Description	PG	Quantity (kg)	SEPP 33 Threshold (kg)	Does SEPP 33 Apply?
2.1	Flammable Gases	n/a	13.4	10,000	No
3	Flammable Liquids	II & III	196	2,500	No
4.1	Flammable Solids	III	25	5,000	No
5.1	Oxidising Agent (gases)	n/a	250	5,000	No
5.2	Organic Peroxide	II	7.8	10,000	No
6.1	Toxic Substances	II	64	2,500	No
8	Corrosive Substances	II & III	183	25,000	No

3.2.2 Transport

The facility only stores minor quantities of DGs and which are well below the minimum transport threshold for SEPP 33 assessment. Therefore, the transport movements would not be exceeded; hence, hence, no further analysis is required based on transport movements.

4.0 Conclusion and Recommendations

4.1 Conclusions

A review of the quantities of DGs stored at the proposed facility 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 facility 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.