From:	Nathan Everett
To:	Jessica Fountain
Cc:	Shaun Williams; John Hawes; Fire Safety
Subject:	RE: Notice of Exhibition – Girraween Waste Recycling Transfer Facility (SSD-9766)
Date:	Tuesday, 24 December 2019 11:11:24 AM
Attachments:	image013.png image014.png image015.png image016.png image017.png

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Dear Jess,

Notice of Exhibition
Girraween Waste Recycling Transfer Facility (SSD 9766)

Thank you for your submission of the Environmental Impact Statement (EIS) for the above development to Fire & Rescue NSW (FRNSW) for agency review and comment.

It is understood that the EIS has been prepared by EMM Consulting Pty Ltd on behalf of Benedict Recycling Pty Ltd (the Applicant) to address matters identified in the Secretary's Environmental Assessment Requirements (SEARs) relating to the operation of a waste recycling and transfer facility with a processing capacity of 220,000 tonnes per annum (tpa) at 224-232 Toongabbie Road, Girraween.

It has been the experience of FRNSW that waste recycling facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

The following comments and recommendations are provided following a review of relevant parts of the EIS and associated appendices.

- It is understood that the Applicant is seeking to construct and operate a waste recycling and transfer facility that will accept; general solid waste (non-putrescible), commercial and industrial waste, uncontaminated soils, vegetation, excavated natural materials, metals, rail ballast and spoil. It is identified within Table 2.4 the expected daily throughputs and maximum stockpile volumes, with an associated maximum stockpile height of 5m. FRNSW would consider a significant portion of such waste streams to be combustible in nature and would require the provision of fire safety systems and measures commensurate with a worst credible fire scenario.
- It is noted under Section 5 of the EIS that the development has been assessed against the requirements of State Environmental Planning Policy No. 33 - Hazardous and Offensive Development (SEPP 33) and deemed to be not potentially hazardous or offensive.
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Emergency Vehicle Access* be addressed. This is required such that FRNSW are able to safely access all parts of the site where an incident may occur.

- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Fire safety in waste facilities* be addressed. Advice and recommendations contained within the guideline have been developed to enable FRNSW to adequately manage an incident at such facilities.
- It is recommended that provisions be made for the containment of contaminated fire water run-off based on the worst credible fire scenario for the site. Any system(s) provided is to be automatic in nature and should not rely upon on-site staff or emergency services personnel to access or activate provided systems or valves in the event of fire.
- It is recommended that if the development proposes to incorporate a fire engineered solution (FES), whether a building design having a performance solution in accordance with the *National Construction Code* (*NCC*) or other infrastructure where building codes are not applicable, FRNSW should be engaged in the fire engineering brief (FEB) consultation process at the preliminary design phase, post approval of the development application. FRNSW also recommend that clauses E1.10 and E2.3 be addressed where a FES is required.
- It is recommended that a Condition of Consent be included that would require the fire and life safety measures for the development to be reassessed for adequacy in the event that either; significant changes are made to the site configuration, processing capacity is increased from 220,000 tpa, or there are changes to either the accepted waste streams or a significant increase in streams that are combustible in nature.
- It is recommended that the an emergency plan for the waste facility in accordance with *AS 3745–2010 Planning for emergencies in facilities* be prepared for the development. An external consultant should be engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS19/3816. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards,
Nathan

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From: Jessica Fountain <Jessica.Fountain@planning.nsw.gov.au>
Sent: Wednesday, 13 November 2019 3:08 PM
To: Fire Safety <FireSafety@fire.nsw.gov.au>
Cc: Shaun Williams <Shaun.Williams@planning.nsw.gov.au>
Subject: Notice of Exhibition – Girraween Waste Recycling Transfer Facility (SSD-9766)

Dear Sir/Madam

The Department of Planning, Industry and Environment has received an Environmental Impact Statement EIS for the Girraween Waste Recycling Transfer Facility (SSD-9766).

The EIS will be publicly exhibited from 20/11/2019 to 18/12/2019.

The EIS can be viewed on the Department's Major Projects site at https://www.planningportal.nsw.gov.au/major-projects/project/11566 from 20/11/19. If you wish to view the documents prior to this date, you will need to register an account on the Major Projects website. A User Guide is attached for you reference.

The Department invites you to advise on the proposal, including advice on recommended conditions by the due date.

If you have any enquiries, please contact Shaun Williams on (02) 8275 1345 or shaun.williams@planning.nsw.gov.au.

Regards

Jess Fountain
DA Coordinator

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The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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