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5 Parkview Drive
Sydney Olympic Park, N.S.W, 2127

Application of SEPP 33

For

Proposed Development
5 Parkview Drive,
Sydney Olympic Park, N.S.W, 2127

State Environmental Planning Policy No.33 (SEPP 33) came into force in 1992 with a focus on the identification and assessment of potentially hazardous industry. It applies to any development proposal, which falls under the Policy's definition of "potentially hazardous industry" or "potentially offensive industry".

Certain activities may involve handling, storing or processing a range of substances which in the absence of locational, technical or operational controls may create an off-site risk or offence to people, property or the environment. These activities would be defined as potentially hazardous or potentially offensive.

For development proposals classified as 'potentially hazardous industry' the policy establishes a comprehensive test by way of a preliminary hazard analysis (PHA) to determine the risk to people, property and the environment at the proposed location and in the presence of controls.

In order to determine whether the proposed development is a Potentially Hazardous development, the risk screening method described in the Guidelines applying SEPP 33 Hazardous and Offensive Development Application Guidelines was applied to the proposed development.

A risk screening process is undertaken on the proposed development to determine whether or not it is potentially hazardous under SEPP 33. The risk screening is based on the potential for, and consequences of an explosion, fire, or release of toxic substances. It takes the following factors into account:

- The properties of the substances being handled or stored;
- The conditions of storage or use;
- The quantity involved;
- The location with respect to the site boundary; and
- The surrounding land use.

The proposed development at 5 Parkview Drive, Sydney Olympic Park, N.S.W., 2127, being identified as Lot 70, DP 818981 proposes to store 24,500 litres of diesel on the site. This diesel storage will be in seven (7) 3,500 litre tanks as day tanks for the onsite backup generators.

The Australian Code for the Transportation of Dangerous Goods by Road and Rail (Dangerous Goods Code) provides a full description of the classification of substances as dangerous goods. The material diesel is not a dangerous good under the dangerous goods code. Australian Standard 1940 defines diesel as a combustible class C1.

Hazardous and Offensive Development Application Guidelines Applying SEPP 33 (2011) Page 16 states

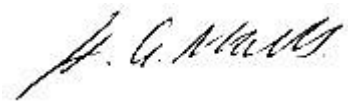
> ***"If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored they are not considered to be potentially hazardous."***

The storage of 24,500 litres of diesel at 5 Parkview Drive, Sydney Olympic Park, N.S.W., 2127, is not "Potentially Hazardous" as described by SEPP 33.

There are no dangerous goods stored at the proposed development that are above the threshold values as described in "Applying SEPP 33". The proposed development is not a "Potentially Hazardous" Industry as described by SEPP 33 and does not require a Preliminary Hazard Analysis to be conducted.

A hazard identification and risk assessment will be conducted for diesel storage in accordance with the Work Health and Safety Regulations (2011).

Regards



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Data Exchange

5 Parkview Dr, Sydney Olympic Park, NSW 2127

Generator Diesel Storage Considerations

The proposed facility will have 7 self-contained diesel generators. Each of these generators is to have a belly tank with a capacity of 3,500L, giving a site total volume of 24,500L. Individually there would be no need for mention of these as the storage would come under the Minor Storage category of AS1940-2017 but combined the on-site storage exceeds the 10,000L Minor Storage categorization.

The proposal for the self-contained diesel generators at 5 Parkview Dr, has minimal aspects which will need addressing from a fuel storage perspective due to being categorized as combustible class 1. The areas which will need to be addressed for the facility will be filling procedures, fuel storage setup/containment, statutory signage in relation to having dangerous goods on site, fire protection and a spill response plan.

Filling of the generator tanks will be conducted via nozzle from a small fuel tanker. This will be conducted by a competent operator provided by the fuel supplier. In addition, due to the locality of the fill point of these tanks, all refueling will be performed inside of a bunded area. This will contain any spills which may occurred as a result of the refueling operation.

The fuel storage for the site is split into 7 different tanks, which are located underneath their own generator, inside of their own individual compound. This significantly reduces the risk of spill as is little to no traffic and more than adequate impact protection. The main incidences where a spill may occur would be due to manufacturing fault, corrosion, generator breakdown and overfilling due to operator error. In addition, the containers where the generators will be housed will have in built bunding of 100% of the tank volume and 20mins worth of fire water in accordance with section 5.8.2 of AS1940-2017. This should mitigate the risk of spill to a very unlikely circumstance.

The statutory signage will be in compliance with AS1940-2017 section 3.8 Security, Signs and Notices. This will involve displaying Dangerous Goods Class Labeling (Combustible C1), Restricted Personnel Only, No Smoking and any other signage required to be compliant to AS1940-2017.

AS1940-2017 Section 11.11.3 & Table 11.4 requiring that each storage tank have a minimum of 2 fire extinguishers, with at least 1 being of a dry powder type (recommended all extinguishers related to the fuel storage to be dry powder). The dry powder extinguishes are to have a rating at least 2A 60B(E), with a 9kg capacity recommended. All extinguishers which are available will be within a 10m access to the tank in accordance with AS1940-2017 Section 11.7.1. This is to be considered by the fire management company involved in the development planning process. Consideration should also be given to the event of a catastrophic generator failure which may result in fire.

The spill response plan will be setout so that spills are categorized into 3 categories (Minor, Moderate and Major spills). Each of these spills will be handled differently due to the amount of product spilt. With a Minor spill consisting of less than 20L spilt, A Moderate Spill being up to 80L spilt and anything over 80L being a major spill. This should be reviewed by and demonstrated to all applicable staff on site.

In conclusion if the above-mentioned steps are implemented the risk of an incident should be reduced to a minimal, with response plans in place for the unlikely chance that an incident were to occur.