

Date: 21 February 2019
Our Ref: 2019/005599

Ms Rose-Anne Hawkeswood
Senior Environmental Officer, Resource & Energy Assessments
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Hawkeswood

SafeWork NSW response to EIS submissions – Port Kembla Gas Terminal (CSSI 9471)

SafeWork NSW has reviewed the responses to the issues we raised with the subject EIS. Some issues need further attention and we have suggested conditions of consent in the enclosure to this letter, should the Department determine to approve the proposal.

Since the proposed facility will be an MHF, the applicant, Australian Industrial Energy (AIE), referred to as “the Operator” under the work health and safety legislation, must notify SafeWork of the quantities of scheduled chemicals at the facility. Based on the proposed quantities, SafeWork will determine the facility as an MHF. Within 2 years of determination, the Operator must apply to SafeWork for an MHF licence and submit a Safety Case. The Safety Case must demonstrate that both on-site and off-site risks have been reduced to so far as is reasonably practicable (SFARP).

The issues summarised in the enclosure will be addressed through the recommended conditions at the Safety Case preparation stage.

Should you have any queries, please contact Sohan Fernando on telephone (02) 88672747, sohan.fernando@safework.nsw.gov.au or Joe Lim on (02) 88672722, joe.lim@safework.nsw.gov.au.

Yours sincerely,



Michael Wright
Manager Major Hazard Facilities

Outstanding issues following submissions by applicant

Numbers within [] brackets refer to the item number of the original question raised and the number used by the applicant in their responses.

- a. [2]: The applicant's response that the odourant will be non-toxic, is noted. However, since most odourants are flammable, the odourant will be an MHF scheduled material and therefore associated incident scenarios will need to be addressed in the Safety Case. SafeWork will require the applicant to address this issue in the Safety Case.
- b. [3]: SafeWork will require, via the Safety Case preparation process, that the applicant eliminate or reduce ignition sources in the fire pump house and plant areas. Gas detectors will be required to be installed in the pumphouse. and plant areas.
- c. [6]: The Safety Case will be required to address the release of a gas cloud from a spill into water during transfer and other operations
- d. [8]: The applicant's response was "escalation has not been considered". On 30 January 2019, the applicant was asked to review and respond, particularly regarding jet fires impinging on equipment & escalation. The addendum to the PHA dated 15 February 2019 addressed the glycol pool fire in the machinery room. Further analysis will be required to be included in the Safety Case.
- e. [16] The applicant's response did not provide the requested information - *the relevant heat radiation and explosion overpressure isopleth diagrams*. The Applicant appears to rely on the possibility of the road being closed to the public, to satisfy HIPAP4. However, since this road may be one of the access routes for emergency services, any closure should not restrict access by the emergency services.

Suggested Conditions

1. Within 28 days of this consent, the proponent must consult with the Major Hazard Facilities Team of SafeWork NSW with regard to the requirements for the preparation of a Safety Case under the Work Health and Safety (WHS) legislation and the safety related controls to be included in the design of the facility.
 2. Prior to completion of the detailed design of the facility, the proponent must consult with the Terrorism Protection Unit and the Major Hazard Facilities Unit of the Counter Terrorism and Special Tactics Command with the NSW Police Force in relation to the ongoing security of the facility. The proponent must ensure that regard is taken of any advice received from the Terrorism Protection Unit and the Major Hazard Facilities Unit of the Counter Terrorism and Special Tactics Command of the NSW Police Force.
 3. Prior to completion of the design of the fire protection and emergency response systems, the proponent must consult with the NSW Fire & Rescue officer attached to the Major Hazard Facilities Team of SafeWork NSW with regard to fire and emergency related matters that are to be included in the *Fire Safety Study* and the *Emergency Plan and Detail Emergency Procedures* to be prepared under conditions XX and YY of this consent. Matters to be addressed will include, but not be limited to:
 - a. the effectiveness of control measures in mitigating the risks associated with major incidents on site;
 - b. Isopleth diagrams including radiant heat flux and overpressure distances;
 - c. The effectiveness of the Safety Management System(SMS) in ensuring the ongoing integrity of the emergency related systems and controls;
 - d. Outcome of the review of the Port Kembla firefighting service in relation to Berth firefighting capacity and Fire Fighting Tugs (FFT).
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