Preliminary Risk Screening Report

UPSS Tank Replacement Works at the Existing Service Station
228 Comur Street, Yass, NSW 2582

Ampol Australia Petroleum Pty Ltd

Level 24, 2 Market Street, Sydney NSW 2000, Australia

Prepared by:

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Basis of Report

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Ampol Australia Petroleum Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

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1.0 INTRODUCTION

SLR Consulting Australia Pty Ltd (SLR Consulting) has been engaged by Ampol Australia Petroleum Pty Ltd (Ampol) to assess the potential impacts for proposed underground fuel tank replacement works at 228 Comur Street, Yass, 2582.

The site is within the suburb of Yass in the Yass Valley Council Local Government Area (LGA). The site is located on land zoned E1: Local Centre pursuant to the Yass Valley Local Environmental (LEP) 2013.

1.1 Development Application RE: Applying SEPP Resilience and Hazards

This Preliminary Risk Screening assessment forms part of the supporting documentation for the Development Application (DA) for the Proposal in accordance with Council's Requirements, which included 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) as the guidelines have not changed since the release of the State Environmental Planning Policy (Resilience and Hazards) 2021 [Resilience and Hazards SEPP]. 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 the newly released Resilience and Hazards SEPP. The purpose of the preliminary risk screening is to exclude from more detailed studies those developments which do not pose significant risk.

Where Resilience and Hazards SEPP identifies a development as potentially hazardous and/or offensive, developments are required to undertake a Preliminary Hazard Analysis (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'.

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 3 in the document Applying SEPP 33: Hazardous and Offensive Development Application Guidelines (NSW Department of Planning, 2011), outlines the screening thresholds for transportation.

This report presents information pertaining to the presence of any hazardous materials, flammable substances, and compressed or liquefied gases proposed to be stored or handled in relation to the Development Site, including on site storage, or transported to or from the site.

2.0 PROPOSED DEVELOPMENT

2.1 Overview

In terms of this Preliminary Risk Screening, Ampol Australia Petroleum Pty Ltd is seeking approval through a Development Application (DA) for the purposes of *UPSS tank replacement works.*

Within this application, the works subject being assessed under this Preliminary Risk Screening Report comprises of the following:

- Removal of three (3) Underground Petroleum Storage System (UPSS) tanks;
- Removal of (1) aboveground LPG storage tank;
- Installation of two (2) 60kL compartmentalised UPSS tank;
- Installation of an underground oil-water separator (SPEL) which will capture, treat and discharge the site's stormwater into Councils stormwater network. This approach has been discussed with and agreed, in principle, with Yass Valley Council;
- Replacement of fuel dispensers, hoses, and pipework;
- Installation of new vent pipes and bollards around the fuel dispensers;
- Resurfacing the fuel forecourt and hard stand areas post UPSS tank installation; and
- Other minor works as identified on the Architectural Plans at **Appendix A.**

Refer to **Section 3** of the Statement of Environmental Effects for complete detailing of the proposal.

2.2 Surrounding Land Uses and Zoning

The surrounding area is predominantly characterised by other commercial activities including an 'Outdoor Power Centre' to the southeast and a real estate agency to the northwest. The nearest sensitive land uses are dwellings located at 53 Polding Street (east) and 68 Lead Street (north)

Details of neighbouring properties and approximate distance to residential properties have been set out in **Table 1.**

Table 1 Neighbouring Properties and Distance

Direction	Approximate Distance of Residence from Lot Boundary
North	47 m
East	58 m

3.0 PRELIMINARY RISK SCREENING

Preliminary risk screening of the proposed development is required under the Resilience and Hazards SEPP to determine the need for a Preliminary Hazard Analysis (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.

3.1 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 discussed below.

Regarding fuel tank storage onsite on site, SLR has been advised that the new underground will comprise three compartments and contain the following fuels of the following underground fuel storage tanks as set out in **Table 2**.

Table 2 Underground Fuel Storage

Tank No.	Contents	Volume (L)	Hazardous Class	Packing Group
1	Premium 98	15,000	3	II
1	Premium 95	25,000	3	II
2	E10	20,000	3	II
2	Diesel*	60,000	3*	III

* Diesel, as a CI fuel is considered as a Hazardous Class 3 flammable liquid when stored in proximity to other Class 3 flammable liquids.

The exact compartment size and type of fuel may be subject to change. The capacities of the proposed tanks however will remain unchanged.

The locations of fuel storage tanks have been set out in the site plan in **Appendix A**.

The total inventory of proposed dangerous goods to be stored on site has been set out in **Table 3**.

Table 3 Classification of Dangerous Goods Classes in Storage & Total Storage*

Substance	Hazardous Class	Packing Group	Total Storage on Site Volume (L)	Quantity (tonnes)
Petroleum spirits*	3	II	60,000	45.1
Diesel#	3	III	60,000	51
Total	3	II/III	120,000	96.1

* Specific gravity = 752kg/m^3; # Specific gravity = 850kg/m^3 ,

3.2 Screening Criteria

The screening criteria is set out in *Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines*. The following instructions relevant to the proposed development are the following:

> *Class 3 PGII / III in qualities greater than 5 tonnes the relevant screening criteria to be compared against are the separation distance to receivers determined from Figure 9: Class 3PGII and 3PGIII Flammable Liquids in the guidelines.*

Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines further states:

> "*For class 3 materials only, if storage is underground, the capacity of the tank should be divided by five prior to assessing it against the screening threshold*."
>
> "*For materials stored in underground tanks, the distance from the above ground filling/dispensing point is measured*."

In the current proposal, the total storage of Class 3 materials is 96.1 tonnes in underground tanks. Dividing this amount by 5 gives a Class 3 total screening storage of 19.2 tonnes (1dp).

Table 4 sets out the relevant Separation Distances for sensitive users, for example residential properties and other users for example commercial properties. As previously mentioned, the separation distance is measured from the above ground filling / dispensing point to the boundary.

Table 4 Dangerous Goods Classes in Storage & Screening Criteria

Substance	Hazardous Class	Packing Group	Screening Storage on Site (tonnes)	SEPP 33 Separation Distance - Sensitive Users	SEPP 33 Separation Distance - Other Users
Petroleum spirits & diesel	3	II / III	19.2 tonnes	8 m	6 m

Comparing the Separation Distance (Sensitive Users) with the distance from the above ground filling / dispensing point to the site boundary found the separation distances exceeded the SEPP 33 Separation Distance (Sensitive Users). Therefore, the site would not be considered hazardous under these guidelines.

Table 5 sets out the distance from the above ground filling / dispensing point to the site boundary.

Table 5 Distance from Above Ground Filling Point to Site Boundary & Screening Criteria

Direction (when north oriented)	Distance from filling point to boundary	Distance from nearest bowser to boundary	SEPP 33 Separation Distance - Sensitive Users	SEPP 33 Separation Distance – Non-Sensitive Users	SEPP 33 Screening Threshold Findings
North	106 m	102 m	8 m	6 m	Greater than Separation Distance - All Users
East	103 m	101 m	8 m	6 m	Greater than Separation Distance - All Users*

* When measured in conjunction with the distance between the site boundary and the most proximate sensitive user thereto.

3.3 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 guideline. These levels are provided below in **Table 6**. It is not expected that the delivery of dangerous goods will exceed the screening guidance for annual or weekly deliveries of bulk fuels.

Table 6 Dangerous Goods Vehicle Movements

ADG Class	Substance	Threshold Vehicle Movements (per annum)	Threshold Vehicle Movements (per week)	Threshold Minimum Quantity (per load)	Load Type	Threshold Level Findings
3 PGII	Petroleum spirits & diesel	>750	>45	3 tonnes	Bulk	**Below threshold**

4.0 CONCLUSION

This report has reviewed and applied the requirements of the Resilience and Hazards SEPP in order to determine whether the policy applies to the Project.

The Resilience and Hazards SEPP screenings for storage of dangerous goods indicated the replacement of UPSS infrastructure at the abovementioned site would not be classified as a hazardous or offensive industry.

5.0 REFERENCES

Commonwealth Government, 2020, Australian Code for the Transport of Dangerous Goods by Road and Rail (ADG Number 7.7).

Department of Planning NSW, 2011, Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines.

State Environmental Planning Policy (Resilience and Hazards) 2021