BARKER RYAN STEWART
TOTAL PROJECT SOLUTIONS

Sims Group Australia Holdings Limited T/A Sims Metal Management

Preliminary Risk Screening

Scrap Metal Transfer Station (max. 25,000 per annum)

21 Tathra Street, West Gosford

September 2019

ENGINEERING
PLANNING
PROJECT MANAGEMENT
SURVEYING
CERTIFICATION

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1 Introduction

Barker Ryan Stewart was commissioned by Sims Metal Management to undertake a Preliminary Risk Screening in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP33) for the scrap metal processing facility, located at 21 Tathra Street, West Gosford (the "subject site"). This development seeks approval for a waste transfer station that will receive up to 25,00 tonnes of scrap metal per annum.

Sims Metal Management Pty Ltd (SMM) currently operates a waste metal transfer station at 354 Manns Rd, West Gosford to 21 Tathra Street, West Gosford. The facility receives up to 25,000 tonnes of scrap metal per annum. There is no processing of scrap metal undertaken at the transfer station, other than of metal sizing to enable efficient transporting, with all scrap metal transported to a SMM facility at St Marys or Milperra in Sydney for processing.

It is proposed to relocate the waste metal transfer station to 21 Tathra Street, West Gosford. The transfer station includes a weighbridge, storage areas, shed, amenities, offices and car parking. There is no change in the receiving capacity of 25,000 tonnes per annum and all scrap metal will continue to be transported to the SMM facility at St Marys or Milperra for processing.

The relocation of the facility to 21 Tathra Street, West Gosford is designated development in accordance with the provisions of clause 32(1)(d) Schedule 3 to the Environmental Planning & Assessment Regulation 2000, due to the subject land being located in an area of high water table.

Equipment used at the current site and expected to be used at the new site include:

- 1 x 32 tonne excavator / material handler; and
- 1 x 5 tonne forklift.

All equipment is used and maintained as per OEM recommendations and the equipment is fitted with OEM noise and emission suppression systems.

The scrap metal is unloaded by a magnet, tipped on to the ground or manually unloaded by hand. The bins are loaded/unloaded by truck mounted equipment. The scrap metal is inspected and sorted with the excavator / material handler (ferrous) and by hand (non-ferrous).
The separated metals are stockpiled and loaded on to transfer vehicles using the excavator or forklift. Normal working stockpile size will be 15m (w) x 30m (l) x 4m (h). There is the capacity to move the stockpile to other locations within the site.

Current operations see waste metal stockpile turned daily. The volume of scrap metal transported out each day is roughly the same as daily purchases. This is expected to remain the same at the proposed site.

The proposed development incorporates an end-of-life vehicle (ELV) de-pollution area where oil, fuel and used lead acid batteries (ULABs) are removed. ULABs will be stored undercover in the non-ferrous shed, bound and wrapped on spill trays. ULABs will be removed from the site by a licensed contractor.

Fuel and oil drained from ELVs will be stored in 2 x 500 litre self bunded cube tanks. The self bunded cubes are fabricated from high grade mild steel (inner tank) and mild steel (outer tank). The bunded tank is fully baffled and has a capacity of 110% of volume. All pumps, connections and hoses are housed and can be locked within the bund.

The onsite refuelling of fixed plant and mobile plant will undertaken using a mobile contractor.

This report assesses the quantities of chemicals for the existing approved vehicle workshop and the proposed scrap metal processing facility in concurrence to ensure quantities of chemicals are adequately assessed in accordance with SEPP33.

By providing a Preliminary Risk Screening in accordance with SEPP 33 and Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 (NSW Department of Planning 2011) this report would be able to demonstrate that the proposed development would not trigger 'SEPP33 – Hazardous and Offensive Development' and that a Preliminary Hazard Analysis (PHA) is not required.

1.1 Scope of Works

The scope of this screening report is limited to the following:

- Site inspection;
- Determining type, quantity and storage of chemicals and fuels that will be stored at the site;
- Determining the transportation details of the chemicals and fuels used at the site including, quantities, frequency of transport, transportation load details;
- Undertaking and compiling a Preliminary Risk Screening in accordance with SEPP33; and
- Advising on the need for further assessments (i.e. PHA).

2 Site and Project Information

The subject site is located at 21 Tathra Street, West Gosford. Site identification and land use information are summarised in Table 1. The site and lot boundaries are shown in Figure 1.

Table 1: Site Identification

Site Identification Details	
Lot/Plan No.	Lot 2 / DP 809109
Local Government Area	Central Coast Council
Approximate site area	0.95 hectares
Current Land Zoning	IN1 – General Industrial

Notes: Source: https://www.planningportal.nsw.gov.au/

The type and quantities of chemicals and fuels stored at the site have been inspected, recorded and used as the basis for the preliminary screening as they reflect the nature of chemical storage that will be in place for the proposed development.

The approximate chemical storage locations are shown on the site plan in figure 1 below.

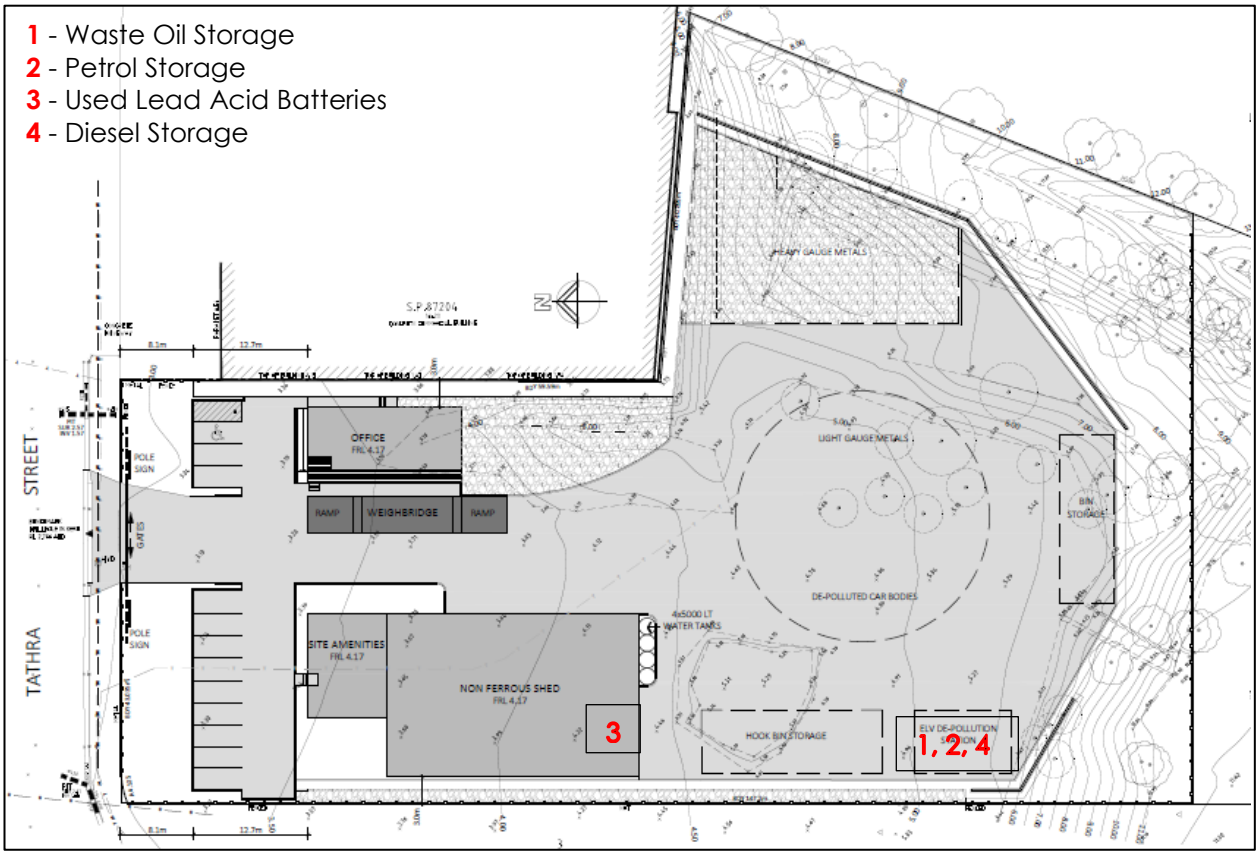

Figure 1 : Site Aerial –Chemical Storage

3 Chemical Storage

All waste oils and fuel removed from the vehicles is transferred to 2 x 500 litre self-bunded cube tanks and is removed offsite once per month by licenced waste contractor.

Used lead acid batteries (ULAB) are also removed from the vehicles and stored undercover, bound and wrapped on spill trays. ULABs are removed by a licenced contractor for reuse.

Table 2 – Chemical Storage

Chemical Name	DG Class	UN Number	Onsite Maximum Quantity	Storage Type
Unleaded Petrol	Class 3 PGII	1203	500 litres	Self-bunded cube tank
Waste Oil	C2 Combustible liquid (Non-Dangerous good)	-	500 litres	Self-bunded cube tank
ULAB	Class 8 PGIII	2794	10 tonnes	10 x 1 tonne spill pallets
Diesel	C1 Combustible liquid / Class 9 PGIII	3082	500 litres	1 x 500 litre tank

4 Preliminary Risk Screening

4.1 Onsite Storage

A preliminary risk screening of the proposed development in accordance with State Environment Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) has been undertaken, with results provided below in table 3. The quantities of dangerous goods do not exceed the threshold quantities for applying SEPP 33. Therefore, a Preliminary Hazard Analysis (PHA) is not required.

Table 3 - SEPP 33 Preliminary Risk Screening

Class	Screening Threshold	Description	Site Specific Description	Quantity to be Stored	Triggers SEPP 33
Class 1.2	5 tonne	Explosives	None	None	No
Class 1.3	10 tonne	Explosives	None	None	No
Class 2.1	10 tonne or 16 m3 if stored above ground 40 tonnes or 64 m3 if stored underground or mounded	Flammable Gases			No
Class 2.2	Not relevant	Non–flammable, non-toxic gases			
Combustible Liquid C1	Not relevant	Combustible liquid with flashpoint of 150^{0}C or less	Diesel	None	Not Relevant
Combustible Liquid C2	Not relevant	Combustible liquid with flashpoint exceeding 150^{0}C	Waste Fuel / Oil (hydraulic oil, engine oil, lubricant oil, drained diesel fuel)	500 litres	Not applicable
Class 2.3	5 tonne	Anhydrous ammonia	None	None	No
	1 tonne	Chlorine and sulphur dioxide stored as liquefied gas in contains <100 kg	None	None	No
	2.5 tonne	Chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg	None	None	No
	100 kg	Liquefied gas kept in or on premises	None	None	No
	100 kg	Other toxic gases	None	None	No
Class 3	Assessed by reference to figures 8 & 9 of applying SEPP 33	Flammable liquids PG I, II and III	Petrol (Class 3 PGII)	500 litres	No
Class 4.1	5 tonne	Flammable Solids	None	None	No
Class 4.2	1 tonne	Substances liable to spontaneous	None	None	No

Class	Screening Threshold	Description	Site Specific Description	Quantity to be Stored	Triggers SEPP 33
		combustion			
Class 4.3	1 tonne	Substances which, in contact with water, emit flammable gases	None	None	No
Class 5.1	25 tonne	Ammonium nitrate – high density fertiliser grade	None	None	No
	5 tonne	Oxidising substances	None	None	No
	2.5 tonne	Dry pool chlorine – in containers <30 kg	None	None	No
	1 tonne	Dry pool chlorine – in containers >30 kg	None	None	No
	5 tonne	Any other Class 5.1	None	None	No
Class 5.2	10 tonne	Organic peroxides	None	None	No
Class 6.1 PGI	0.5 tonne	Toxic substances	None	None	No
Class 6.1 PGII & PGIII	2.5 tonne	Toxic substances	None	None	No
Class 6.2	0.5 tonne	Infectious substances	None	None	No
Class 7	All	Radioactive Material	None	None	No
Class 8 PGI	5 tonne	Corrosive substance	None	None	No
Class 8 PGII	25 tonne	Corrosive substance	None	None	No
Class 8 PGIII	50 tonne	Corrosive Substance	ULAB	10 tonnes	No

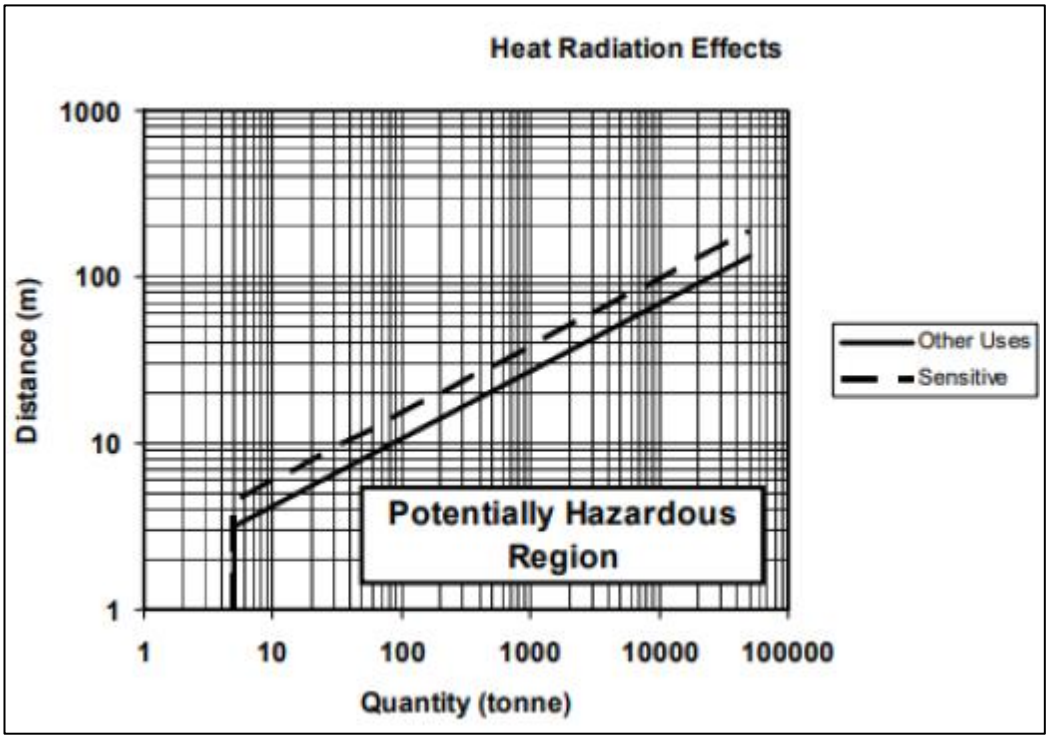

Figure 2: Class 3 PGII and 3PGIII Flammable Liquids Heat of Radiation

The quantity of petrol on site at any one time is 4,000 L or less corresponding to approximately 3 tonnes which is outside of the potentially hazardous region of the heat of radiation effects graph shown in Figure 4.

As seen in the table above the quantities of chemicals required for both the proposed processing of 30,000 T of scrap metal and the existing approved vehicle workshop do not exceed the SEPP 33 threshold and therefore a preliminary hazard analysis is not required.

4.2 Transport Quantities

The proposal has been assessed against the transportation screening threshold stipulated in the SEPP 33 guidelines. The proposed load details and frequency of delivery for the proposed dangerous goods to be stored and used at the site is described in the table.

Table 4: Transportation details of loads of dangerous goods

Dangerous Good Name	Dangerous Goods Class	Load Details		Transportation Frequency
		Quantity per Load	Load Type	
Diesel	C1 Combustible liquid / Class 9 PGIII	500 litres	Bulk	1 per month
Petrol	Class 3 PGII	500 litres	Bulk	1 per month
Waste Oil	C2 Combustible liquid (Non-Dangerous good)	500 litres	Bulk	1 per month
ULAB	Class 8 PGIII	5 tonnes	Package	1 per week

As staff members use the petrol within their personal cars, small quantities of petrol are effectively transported off site, which would be the most frequent chemical transport movement.

Table 5 is an excerpt of Table 2 – "Transportation Screening Thresholds" from *Hazardous and Offensive Development Application Guidelines: Applying SEPP 33, NSW Government Department of Planning(2011)* and provides the transportation screening thresholds for dangerous goods classes of relevance to the site.

Table 5: Transportation Screening Thresholds

Dangerous Goods Class	Vehicle Movements		Minimum Quantity per Load	
	Cumulative Annual	Peak Weekly	Bulk	Packages
Class 3 PGII	>750	>45	3	10
Class 8 PGIII	>500	>30	2	5
Class 9	>1000	>60	No limit	-

The transport screening thresholds for the dangerous goods classes are not exceeded. Therefore, the transport of dangerous goods for the proposed development will not trigger SEPP33 and a preliminary hazard analysis is not required.

5 Concluding Remarks

Barker Ryan Stewart was commissioned by Sims Metal Management to undertake a Preliminary Risk Screening for the metal transfer facility, located at 21 Tathra Street, West Gosford NSW 2250.

The preliminary risk screening was undertaken in accordance with State Environment Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33). The quantities of chemicals and dangerous goods do not exceed the threshold quantities for applying SEPP 33. Therefore, a Preliminary Hazard Analysis (PHA) is not required.

This concludes the report.

Darryl Fitzgerald | Senior Town Planner
Barker Ryan Stewart Pty Ltd

6 Limitations

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Sims Metal Management, as per our agreement for providing environmental services. Only Sims Metal Management are entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Sims Metal Management for the purposes of preparing this report. Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

Appendix A – Safety Data Sheet

SYNTHECOL XL FOAMER
Revision Date: 19 October 2012
Version : 1 – 1
Material Safety Data Sheet in accordance with NOHSC:2011/HSNOCOP 8-1

1. Identification of the substance/preparation and of the company/undertaking
Trade name: SYNTHECOL XL FOAMER
Identification of the company
Chemcolour Industries Australia Pty Ltd
Monash Business Park
20-22 Gardiner Road
Notting Hill, VIC 3168
Australia
Telephone no. : +61 (3) 9538 0300
Chemcolour Industries (NZ) Ltd
24-26 Poland Road
Wairau Valley
North Shore, 0627
New Zealand
Telephone no. : +64 (9) 444 4650
Information about the substance/preparation
Regulatory Department
Tel: +61 (3) 9538 0300 (Australia); +64 (9) 444 4650 (New Zealand)
e-mail: ProductSafety@chemcolour.com
Emergency telephone numbers : 1800 127 406 (24 h, Australia)
0800 243 622 (24 h, New Zealand)
+64 3 353 0199 (24 h, Worldwide)
2. Hazards identification
Hazard Classification
Not classified as hazardous according to the criteria of ASCC.
Classified as hazardous according to the criteria of GHS
Classified as hazardous according to the criteria of HSNO Minimum degrees of hazard regulations.
Not classified as dangerous goods according to the Australian Code for Transport of Dangerous Goods (ADG).
Not classified as dangerous goods according to the Transport of Dangerous Goods on Land (NZS5433).
Risk phrase(s) :
None
Safety phrase(s) :
S24 Avoid contact with skin
S25 Avoid contact with eyes
S61 Avoid release to the environment.
Classification:
GHS HSNO SIGNAL Hazard Statement
Class Class WORD
Skin corr/irr't:
Cat 2
6.3A Warning H315 Causes skin irritation
Eye damage/
irr't: Cat 2A
6.4A Warning H320 Causes eye irritation

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Aquatic Toxicity
(Chronic) Cat 4
9.1D -- H402 Harmful to aquatic life.
3. Composition/information on ingredients
Hazardous ingredients
Component CAS # EINECS # Proportion
2-Methylpentane-2,4-diol 107-41-5 203-489-0 <10%
Blend of surfactants -- -- >10-<30%
Non Hazardous
components
-- -- Balance
4. First aid measures
If on skin
Wash with plenty of soap and water. If skin irritation occurs: Get medical advice/ attention. Take off contaminated clothing and wash before re-use.
If in eyes
Immediately rinse eyes with running water. Remove contact lenses (if present) and continue flushing. If eye irritation persists, get medical advice/attention.
If inhaled
If breathing is difficult, remove to fresh air and keep at rest in a position comfortable for breathing. Call a POISON CENTER or doctor/ physician if you feel unwell.
If swallowed
Call a POISON CENTER or doctor/ physician if you feel unwell.
5. Fire-fighting measures
Suitable extinguishing media
Compatible with all usual extinguishing media
Extinguishing media that must not be used for safety reasons
No restrictions
Special hazards from the substance itself, its combustion products or from its vapours
In the event of fire toxic fumes are emited.
Special protective equipment for firefighting
In case of combustion use a suitable breathing apparatus.
6. Accidental release measures
Methods for cleaning up/taking up
Do not allow the product to enter drains, sewers or waterways. Remove leaking containers to a detached area. Bund spill area and recover – consider recycling. Absorb spilled product with inert material (e.g. sand, earth etc.)
Additional information
Floors will become slippery.
Must not be released into sewers, drains or wells.
Take up as such and consider recycling.
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7. Handling and storage
Advice on safe handling
Ensure adequate ventilation
Read label before use.
Advice on protection against fire and explosion
No special measures necessary
8. Exposure controls / personal protection
National exposure standards
NZ Workplace Exposure Standards
2- Methyl-2,4-pentanediol CAS: 107-41-5 TWA Ceiling 25ppm (121mg/m3)

AU HSIS Exposure Standards
2- Methyl-2,4-pentanediol CAS: 107-41-5 TWA mg/m3 121 Peak limitation
Occupational exposure controls
Hygiene measures
Observe the usual precautions when handling chemicals.
Eye protection: Safety glasses/ goggles
Hand protection: PVC gloves
Skin and body protection: Protective clothing, PVC apron and boots.
9. Physical and chemical properties
Form : liquid
Colour : Slight yellow
Odour : Mild
Boiling point : ~100°C
Flash point (°C) : Not applicable expected >93°C
Solubility in water: Miscible
Ph : 6-8
10. Stability and reactivity
Stability : Stable at normal temperatures
Incompatible materials : Mild steel. Copper. Copper alloys. Strong acids.
Conditions to Avoid : Temperatures above 40°C
Hazardous reactions
No hazardous reactions when stored and handled according to prescribed instructions.
Hazardous decomposition products
None expected under normal use conditions.
SYNTHECOL XL FOAMER
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11. Toxicological information
Acute oral toxicity : LD50 >5000 mg/kg
Irritant effect on eye : Direct contact may cause severe damage
Irritant effect on skin : Irritating to skin.
12. Ecological information
Ecotoxicity : Harmful to the environment
13. Disposal considerations
Product
Dispose of in accordance with local authority regulations
Uncleaned packaging
Consider recycling.
14. Transport information
Land : ADG not restricted
Land : NZS5433 not restricted
Air : IATA not restricted
Sea : IMDG not restricted
15. Regulatory information
HSNO Approval Number: HSR002503 - Additives, Intermediates, Process Chemicals and Raw Materials (Subsidiary Hazard) Group Standard 2006
Tracking: Not required
Approved Handler: Not required
Poison Schedule (SUSMP): None allocated
National Chemical Inventories
AICS : All components are listed on the Australian Inventory of Chemical Substances
NZIoC : All hazardous components are listed on the New Zealand Inventory of Chemicals
16. Other information
This MSDS summarises our best knowledge of the health and safety hazard information of the product

and how to safely handle and use the product in the workplace. Each user should read this MSDS and consider the information in the context of how the product will be handled and used in the workplace, including in conjunction with other products.
If clarification or further information is needed to ensure that an appropriate risk assessment can be made, the user should contact this company.
Our responsibility for products sold is subject to our standard terms and conditions, a copy of which is sent to our customers and is also available on request.
SYNTHECOL XL FOAMER
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Since the actual use of this product is beyond the control of Chemcolour Industries, we make no warranty, expressed or implied, concerning the use of this product. It is the responsibility of users to ascertain that the product is suitable for intended applications.