



Metroplan Services

ELGAS LIQUIFIED PETROLEUM GAS STORAGE AND DISTRIBUTION FACILITY (SSD 8448)

**130 CORMORANT ROAD KOORAGANG (LOT 1
DP 1195449)**

CONDITION B6 - POST-START UP COMPLIANCE REPORT

**Prepared on behalf of:
Sovechles Nominees Pty Ltd**

For submission to:

**NSW GOVERNMENT DEPARTMENT OF PLANNING, INDUSTRY AND
ENVIRONMENT**

Prepared by:



Metroplan Services

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EXECUTIVE SUMMARY

Metroplan Services has been engaged by Sovechles Nominees Pty Ltd to prepare this post-start up compliance report in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) to address the requirements of Condition B6 of State Significant Development (SSD) 8448 – approved by the Minister for Planning on 23 November 2018 for the construction and operation of a liquified petroleum gas storage and distribution facility at 130 Cormorant Road Kooragang (Lot 1 DP 1195449).

The now constructed facility is operated by ELGAS.

It should be noted that, separately, in accordance with the requirements of Condition C15, Operation Compliance Reports are to be carried out and submitted at intervals no greater than 52 weeks from the date of commencement of operation.

In accordance with Condition C14, a Compliance Monitoring and Reporting Program has been submitted to, and accepted by, the NSW Department of Planning, Industry and Environment.

Condition B6 of the consent sets out the following requirement:

Post-start up

Three months after the commencement of operation of the development, the Applicant must submit to the Planning Secretary a post-start up compliance report verifying that:

- (a) the Emergency Plan required under Condition B4(a) is effectively in place and that at least one emergency exercise has been conducted; and*
- (b) the Safety Management System required under Condition B4(b) has been fully implemented and that records required by the system are being kept.*

Condition B4 is set out as follows:

Pre-commissioning

No later than two months prior to the commencement of commissioning of the development, or within such further period as the Planning Secretary may agree, the applicant must submit for the approval of the Planning Secretary plans and systems as set out under subsections (a) and (b) below. Commissioning must not commence until approval has been given by the Planning Secretary.

- (a) a consolidated comprehensive Emergency Plan and detailed emergency procedures for all developments within Lot 1 DP 1195449. The plan must address evacuation procedures for neighbouring facilities occupying Lot 1 DP 1195449. The Plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No 1 Emergency Planning and in consultation with neighbouring facilities occupying Lot 1 DP 1195449.*
- (b) a document setting out a comprehensive Safety Management System, covering all on site operations and associated transport activities involving hazardous materials. The safety management system must be developed in accordance with the Department's Hazardous Industry Planning Advisory Paper No 9 Safety Management*

A consolidated comprehensive Emergency Plan and comprehensive Safety Management System have been submitted to, and accepted by, the NSW Department of Planning, Industry and Environment in accordance with B4.

1. INTRODUCTION

1.1 Project name and application number

Liquefied petroleum gas storage and distribution facility (SSD 8448).

1.2 Project address

130 Cormorant Road Kooragang.

1.3 Project Phase

Post-start up.

1.4 Compliance Reporting Period

Three months - post-start up

1.5 Project Activity Summary

The development commenced operation on 23 October 2020. On 9 December 2020 an inspection of the site was carried out by Andrew Biller of Metroplan Services with Patrick Egan (ELGAS) and Mitchell Sovechles (Sovechles Nominees) also present.

This report has been prepared by Metroplan Services as per the requirements of Condition B6 to verify that:

(a) that the Emergency Plan required under Condition B4(a) was effectively in place and that at least one emergency exercise has been conducted; and

(b) the Safety Management System required under Condition B4(b) has been fully implemented and that records required by the system are being kept.

Emergency Plan

The Emergency Plan includes a general arrangement drawing showing key elements across the site including fire hose reels, fire extinguishers, emergency stop devices, safety showers, first aid facilities, eye wash facilities, gas detectors, armco barriers, emergency information boxes, and lighting. During the site inspection, the Regional Depot Operations Manager for Northern New South Wales pointed out where each of these elements was on site.

An emergency safety exercise was conducted on site on 3 December 2020. Evidence of the exercise is included at **Appendix A**.

Fire and Rescue NSW have also reviewed the Emergency Plan and is satisfied that the plan is consistent with the requirements of Australian Standard AS 3745-2010 *Planning for emergencies in facilities*. Relevant correspondence is included at **Appendix B**.

Safety Management System

Appendix C includes a letter from ELGAS confirming that the ELGAS Safety Management System (ELGAS SMS) has been implemented at the site.

The ELGAS SMS is the primary means of ensuring safe operation of all ELGAS sites and:

- Ensures control of all safety critical business processes;

- Achieves compliance with legislative and elected management system requirements, and
- Addresses Workplace Health, Safety and Environment management.

To ensure ELGAS Newcastle has implemented the ELGAS SMS, two key internal audits have been conducted.

1.6 Key Project Personnel

The names and contact details of key personnel who are responsible for the environmental management of the development are:

Patrick Egan - Regional Operations Manager Northern NSW

Tel: 02- 49158500

E-mail: patrick.egan@elgas.com.au

Chris Beston – Health Safety Environment Manager ELGAS Region South Pacific

10 Julius Avenue

North Ryde NSW 2113

2. COMPLIANCE STATUS SUMMARY

The status of each applicable compliance requirement during the reporting period is set out in the table below:

Table 1 Compliance Status

Unique ID	Compliance Requirement	Status	Description
B6	<i>Post-start up Three months after the commencement of operation of the development, the Applicant must submit to the Planning Secretary a post-start up compliance report verifying that: (a) the Emergency Plan required under Condition B4(a) is effectively in place and that at least one emergency exercise has been conducted; and</i>	Compliant	The proponent has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with
	<i>(b) the Safety Management System required under Condition B4(b) has been fully implemented and that records required by the system are being kept.</i>	Compliant	The proponent has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with

3. NON-COMPLIANCES

There are no non-compliances in relation to the requirements of Condition B6.

4. PREVIOUS REPORT ACTIONS

There are no previous report actions.

5. INCIDENTS

There are no previous incidents to report in relation to Condition B6.

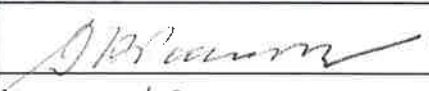


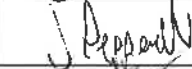

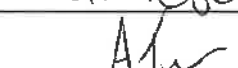
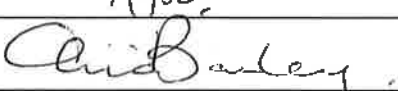

6. COMPLAINTS

There are no complaints in relation to Condition B6.

Appendix A – Evidence of Emergency Exercise

Safety Exercise Record

Activity:	<p>CONDUCT EMERGENCY SAFETY EXERCISE UTILISING NEWCASTLE (KOORAGANG) EMERGENCY PLAN VI.3 SEPTEMBER 2020.</p> <ul style="list-style-type: none"> • SCENARIO - UNCONTAINED GAS LEAK AT FILLPOINT (BULK) • REVIEWED AND ALLOCATED KEY ROLES AND TASKS • SOUGHT FEEDBACK FROM PARTICIPANTS • SEE ATTACHED MEETING MINUTES.
Team Leader:	DAVID RUSSELL
Location:	ELGAS KOORAGANG DEPOT.
Date:	3RD DECEMBER 2020

Name (Print)	Job Title	Signature
DARREN PEALOCK	HEAD OF LEGAL	
KAREN CROSS	REGIONAL MANAGER	
DAVID RUSSELL	CSO	
JAKE PEPPERALL	CSO	
TOBY TRAVALOS	CSO	
ADAM BRADY	TRANSPORT MANAGER	
ASHLEY MIDSON	CSO	amidson
AINSLEY BO TRITTON	CSO	
OLIVIA MORGAN-BAILEY	SCHEDULER	
Adam Brady	Tom	

SAFETY EXERCISE – DECEMBER 3RD, 2020

EMERGENCY EVACUATION EXERCISE – UNCONTAINED GAS LEAK AT BULK FILL POINT

Location: Elgas Depot 130 Cormorant Road, Kooragang

PARTICIPANTS: Site visitor - Darren Peacock (Head of Legal), Karen Cross, Adam Brady, David Russell, Ainsley Tritton, Olivia Bailey, Jake Pepperall, Toby Travalos, Ashley Midson.

Roles allocated to team members for the exercise.

Walked through and discussed actions to be taken by each role. Reviewed resources available during emergency and determined best method of co-ordination of activities as below.

- Bookshelf to be located at front office exit. Bookshelf to contain all resources required in the event of evacuation.
 - Hard Hats
 - Laminated Role Cards detailing responsibilities
 - Laminated Emergency Response cards for the 6 different Emergency types
 - First Aid Kit
 - Visitor sign-in book
 - Copy of full emergency plan
 - Attached to Communications Officer Laminated role card is a laminated copy of Neighbours telephone numbers, Driver Mobile Phone Numbers.
 - Next of Kin contact details discussed in the event of hospitalisation for quick notification to family members. Contact numbers to be obtained and attached to Communications Officer card.

- Additional lock to be daisy chained to rear depot gate to provide exit for team members working at rear of the yard.

- Reviewed benefit of putting witches hats on driveway to warn incoming traffic not to enter site.

Appendix B – Correspondence from NSW Fire and Rescue



File ref. no: BFS20/2163 8000012251
Doc. ref. no: D20/78788
Contact: MHF Liaison Officer Station Officer Lynden Moyes

Patrick Egan
Elgas Limited
PO Box 1009
Warners Bay NSW 2282

24 September 2020

Dear Sir

Re: Review of emergency plan for Elgas Newcastle, 130 Cormorant Road, Kooragang Island (SafeWork Ref. no. NDG2000406)

We are writing in reference to your emergency plan on the above premises, received by Fire and Rescue NSW (FRNSW) on 11 September 2020. On behalf of the FRNSW Commissioner we have reviewed this document and provide the following comments:

1. FRNSW is satisfied that the emergency plan is consistent with the requirements of Australian Standard *AS 3745-2010 Planning for emergencies in facilities*.
2. Lodging this emergency plan satisfies your obligations under Clause 631 of the *Work Health and Safety Regulation 2017*.
3. If the emergency plan is revised at any future date, a copy of the new version of the emergency plan is to be submitted to FRNSW to update our records.

The emergency plan should be implemented and immediately made available to staff. An electronic copy of this emergency plan will be retained by FRNSW as a record and may be referred to in the event of fire or emergency incident.

Should you have any further enquiries regarding any of the above matters please do not hesitate to contact the Fire Safety Branch.

Yours faithfully

A handwritten signature in black ink, appearing to read "John Hawes".

Superintendent John Hawes
Manager
Fire Safety Infrastructure Liaison
cc: Patrick.egan@elgas.com.au

Appendix C – Correspondence from ELGAS in relation to Safety Management System

16 December, 2020

Planning Secretary
Department of Planning, Industry and Environment
New South Wales

Development Consent Requirements - Elgas Facility
Part Lot 1 DP 1195449
130 Cormorant Road, Kooragang NSW.
SSD 8448

Dear Secretary,

Re: ELGAS Safety Management System

The ELGAS Safety Management System (ELGAS SMS) has been implemented at ELGAS Newcastle (Kooragang) site. Operation commenced on 23 October, 2020.

The ELGAS SMS is the primary means of ensuring safe operation across all ELGAS operations and:

- Ensures control of all safety critical business processes,
- Achieves compliance with legislative and elected management system requirements, and
- Addresses Workplace Health, Safety and Environment management

The following has been implemented at ELGAS Newcastle:

- ELGAS Safety Management Plan for LPG Delivery (May 2019)
- ELGAS Safety Management System Reference Guide

To ensure ELGAS Newcastle has implemented the ELGAS SMS, two key internal audits have been conducted as per:

- SMS Element 15B – Auditing (*Document: ELGGEN-HSE-119 - Audits V2.0*). This is the key mechanism to assess site compliance to the ELGAS SMS and includes
 - a. As per section 5.0 Internal Audits:
5.1 Major Hazard Review Program (MHRP)

An MHRP Audit was conducted on 17 November 2020. The Major Hazard Review Program (MHRP) is a LINDE Global assurance program to ensure safety systems and operational practices are active to minimise societal risk. A process for identifying and assessing large-scale site hazards that may pose risks to our employees or the off-site public.

- b. As per Section 5.0 Internal Audits
Section 5.3 ELGAS Depot Audits

An Internal Depot Audit was conducted on 12 December 2020. The Internal Depot Audit is conducted annually to assess compliance and conditions of ELGAS Depots. The Internal Depot Audit is conducted by personnel who are not involved in the development or day-to-day implementation of the site's SMS

Yours sincerely



Chris Beston
HSE Manager ELGAS
Region South Pacific


Appendix D – Compliance Report Declaration Form

COMPLIANCE REPORT DECLARATION FORM

Project Name:	ELGAS Liquefied Petroleum Gas Storage and Distribution Facility
Project application Number	SSD 8448
Project Address	130 Cormorant Road Kooragang (Lot 1 DP 1195449
Proponent	Sovechles Nominees Pty Ltd
Title of Compliance Report	Compliance Monitoring and Reporting Program Report – Commencement of Operations
Date	12 January 2021

I declare that I have reviewed relevant evidence and prepared the contents of this Compliance Report and to the best of my knowledge:

- the Compliance Report has been prepared in accordance with all relevant conditions of consent;
- the Compliance Report has been prepared in accordance with the Compliance Reporting Post Approval Requirements;
- the findings of the Compliance Report are reported truthfully, accurately and completely;
- due diligence and professional judgement have been exercised in preparing the Compliance Report; and
- the Compliance Report is an accurate summary of the compliance status of the development.

Name of Authorised Reporting Officer	Andrew Biller
Title	Director
Signature	
Qualification	BSoc Sci, Master of City and Regional Planning
Company	Metroplan Services Pty Ltd
Company Address	265 King Street Newcastle NSW 2300