

Sally Munk

From: Troy Stephens <Troy.Stephens@safework.nsw.gov.au>
Sent: Thursday, 22 May 2025 2:49 PM
To: Sally Munk
Cc: MHF; Andrew Battye
Subject: RE: Notice of Exhibition – Rural Supplies Building, Moree (DA25/5067)

Good afternoon Sally,

Please find the following comments from SafeWork NSW regarding this development application for the Rural Supplies Building, Moree (DA25/5067).

- a) Before finalisation of the facility's design, the proponent to discuss with Safework NSW the arrangements for minimising health and safety risk SFARP, particularly on-site.
- b) SafeWork requires the proponent to consider the following prior to finalising the design:

To minimise risk to people's health and safety so far as is reasonably practicable (SFARP) the following should be considered as part of the design process.

1. Provision of smoke and / or fire detection and sprinkler system (to address the risk of from fire and from a potential toxic plume identified in the PHA).
2. Minimising the quantity of any combustibles in class 6.1 stores
3. Minimising the risk of exposure to class 6.1's, e.g., by storing IBC's of class 6.1's at grade (ie, not elevated) to reduce risk of a possible release onto people, e.g., if a FLT tyne pierced an IBC
4. How the risk of water contacting Fumitoxin tablets will be minimised
5. Provision of access around stored IBC's to inspect for leaks. This would help to prevent the risk from a potential leak drying out and forming crystals that could be blown about resulting in ingestion or inhalation".

Also of note:

Reducing the quantity of a Schedule 15 chemical will not remove the requirement of being considered an MHF, there are multiple considerations.

The quantities and types of Schedule 15 chemicals are only one measure when being classed as / or being determined as an MHF. Please pay particular attention to Clause 541 (2)(a-c) from the WHS Regulation 2017, Please note the following:

- Clause 535 - A facility at which Schedule 15 chemicals are present or likely to be present in a quantity that exceeds their threshold quantity must be licensed under Part 9.7.
- Clause 541 –
 - (1) This clause applies if an inquiry discloses that the quantity of Schedule 15 chemicals present or likely to be present at a facility or proposed facility exceeds 10% of their threshold quantity, but does not exceed their threshold quantity.
 - (2) The regulator may determine the facility or proposed facility to be a major hazard facility if the regulator considers that there is a potential for a major incident to occur at the facility or proposed facility having regard to all relevant matters, including—
 - (a) the quantity and combination of Schedule 15 chemicals present or likely to be present at the facility, and
 - (b) the type of activity at the facility that involves the Schedule 15 chemicals, and
 - (c) land use and other activities in the surrounding area.

When determining sites and particularly when in the planning phase clause 541 (2)(b&c) are looked at in detail. At present SafeWork NSW, where products are a mixture, considers the whole quantity of the mixture not just the active ingredient.

Regards,

Troy Stephens

Manager | Major Hazard Facilities (MHF)

SafeWork NSW

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