



CFA Fire Safety
Fire & Emergency Management

Email: [REDACTED]
Telephone: [REDACTED]

CFA Ref: [REDACTED]

3 December 2019

[REDACTED]
EPA Victoria
200 Victoria Street
CARLTON VIC 3053

Dear [REDACTED],

***Conditional Consent to Works Approval Application
Landfill, 64 Hyland Highway LOY YANG***

Site Name: Landfill Facility (Latrobe City Council)
Site Address: 64 Hyland Highway LOY YANG 3844
Works Approval: 1003681
Proposal: Extension to landfill.

I refer to correspondence dated 25th September 2019 seeking comments in relation to the above application for a Works Approval. CFA's comments and recommendations are based on a review of the following documents:

- ***Latrobe City Council Hyland Highway Landfill Extension – Works Approval Application (including Appendices), by GHD, dated August 2019.***

CFA supports granting of the Works Approval by EPA subject to the following recommendations.

Fire Protection Systems and Equipment

CFA recommends that the fire protection system is fit-for-purpose; its design informed by a risk management process (e.g., a process that demonstrates that the installed system is suitable for the hazards and risks, including bushfire risk), including credible worst-case fire scenarios. The fire protection system is to be to the satisfaction of CFA.

Hazard and Risk Management

Temperature Monitoring

CFA recommends that procedures for temperature monitoring of active landfill cells be developed and documented. Records of monitoring tests are to be retained.

Procedures are to include:

- **A schedule of regular monitoring, including triggers for additional monitoring where required (e.g., linked to fire danger ratings or Total Fire Ban days);**
- **An evidence-based definition of 'normal' and 'elevated' temperature ratings, established through a risk management process; and**
- **Procedures in the event of 'elevated' temperatures.**

Hot Works

CFA recommends that procedures for undertaking hot works are developed and documented for the facility, informed by a risk management process. Procedures are to consider:

- **The separation of hot work activities from active cells, gas vents and the flare; (e.g., a minimum of 3m); and**
- **Provisions to ensure that hot work does not occur on days of Total Fire Ban.**

Hot Loads

CFA recommends that procedures for the management of hot loads are developed and documented for the facility, informed by a risk management process. Procedures are to consider the monitoring and management of hot loads arriving at the facility.

Gas Flare

CFA recommends that flare ignition scenarios are considered as part of risk management processes and emergency response. Risk management is to consider weather conditions; carbon build-up within the flare stack; and whether the carbon is expelled when during flaring activities. Emergency procedures related to flares are to include notification triggers for the fire brigade.

CFA recommends that an exclusion zone with a minimum ten-metre radius is established at the base of the flare. This area is to be mineral earth, crushed rock (or equivalent non-combustible materials), and no combustible materials of any sort are to be stored or handled in this area.

Vehicles and Plant

CFA recommends that vehicles, plant and equipment is regularly maintained, and that a process is in place to record, track and close-out maintenance issues identified through regular, scheduled inspections, servicing and testing of the system. Maintenance records are to be available on-site.

Emergency Management Plan

CFA recommends that the Emergency Management Plan (EMP) is reviewed and updated to reflect the changed facility operations. The EMP is to consider the requirements of AS 3745: Planning for emergencies in facilities, including but not limited to:

- **Plan revision/review details, general facility information, and testing (exercising) schedule;**
- **Detailed drawings/site plans of the facility and the surrounding area, which includes the location of (a) buildings, roads, access points; (b) fire protection**

systems and equipment; (c) dangerous goods storage areas (if applicable); (d) emergency resources (vehicles, equipment, PPE); (e) isolation valves and drainage systems;

- **Risk management, including the identification, assessment and control (treatment) of hazards and risks at the facility, that informs the EMP;**
- **The EPC structure and responsibilities, and the ECO structure;**
- **Emergency procedures, including bushfire/grassfire; management of hot loads; and fire water runoff containment;**
- **Emergency equipment and resources available at the site (equipment and PPE, and their location on-site);**
- **Training requirements and processes for on-site personnel; and**
- **On-site and off-site emergency warning systems (sirens, lights, alarms, loudspeakers, etc. their location and how to access them).**

Provision of Emergency Information

Emergency Information Book

CFA recommends the development of an Emergency Information Book (EIB). The EIB is to include the key information from the emergency management plan. Information on the structure and content for EIBs is available in CFA's 'Guideline for the Provision of Emergency Information', published March 2019.

<https://www.cfa.vic.gov.au/documents/20143/70271/160530-Emergency-Information-Book-V1.pdf/0891c8f9-72b8-bf81-2f7e-a0d18fbb3bdf>

The Emergency Information Book must be stored in the site's Emergency Information Container.

Emergency Information Container

CFA recommends that a container housing your Emergency Information Book be:

- **Located at the site entrance;**
- **Painted red and clearly labelled 'Emergency Information' in contrasting lettering at least 25mm high; and**
- **Accessible with a fire brigade standard '003' key.**

Review and Accuracy of Emergency Information

CFA recommends that EIBs be reviewed at least annually to ensure:

- **Currency and accuracy of information;**
- **The removal of any information that is superfluous, no longer relevant or that may have expired; and**
- **That the materials have not significantly degraded due to exposure or infestation.**

If you require further assistance on this matter, please contact me on [REDACTED].

Yours sincerely



Senior Dangerous Goods Officer
Fire Prevention and Preparedness
CFA Headquarters