

Pre-Start Up Compliance Report

ELGAS

National Technical

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Contents

Scope of Report	. 3
Summary of Submission/Approval/Construction & Commissioning:	. 3
Building Works to be Completed:	. 4
The following Hazop recommendations have been implemented:	. 4
The following Fire Safety Report recommendation has been implemented:	. 4
The following Elgas essential works are now completed:	. 4
Elgas Fit-off Works in Progress:	. 4
Final Commissioning:	. 5
Proposed Actions prior to Start-up:	. 5
Additional requirements imposed by the Planning Secretary under Condition A2(b) – Applicant	. 5
Additional requirements imposed by the Planning Secretary under Condition A2(b) – Elgas	. 5
Conclusion	5

Scope of Report

This report summarises the following:

- Works completed and in progress
- Any outstanding actions
- Any additional works
- Details relating to compliance with conditions B3 & B4 as outlined in the *Development Consent SSD 8448*, dated 18 November 2018.

The report details that Elgas has already provided to the applicant, *Sovechles Nominees Pty Ltd*, for submission to the *Department of Planning, Industry and Environment*, evidential documentation of a number of complying actions as part of Pre-Installation, Pre Commissioning and Pre-Operation requirements as detailed in *Sections B3 & B4* of the above mentioned document and the Department's responses.

This document seeks to ensure that Elgas has not overlooked any item that would delay the start of operations of the depot as planned and it constitutes the "Pre-start Up Compliance Report" as required and detailed in **Development Consent Condition B5**.

Summary of Submission/Approval/Construction & Commissioning:

Please find below a list in chronological order of completed actions and significant dates relating to this project:

- 23/11/2018 Development Consent SSD8448 was issued.
- 01/11/2019 Applicant sent to DPIE, Elgas' Pre-construction Reports as per **Consent Condition B3.** The following specific reports were sent:
 - > Fire Safety Study
 - > Fire Hazard and Operability Study
 - > Final Hazard Analysis
 - Construction Safety Study
- 05/12/2019 Construction Certificate was issued.
- 12/12/2019 Applicant received approval letter from DPIE for Elgas' Pre-construction Reports.
- 16/12/2019 Construction started.
- 06/04/2020 Applicant sent to DPIE, Elgas' Pre-commissioning Reports as per **Consent Condition B4**. The following specific reports/documents were sent:
 - Newcastle (Kooragang) Emergency Plan
 - ➤ ELGAS Safety Management Plan for LPG Delivery
 - > ELGAS SMS Reference Guide
- 05/05/2020 Applicant received approval letter from DPIE for Elgas' Pre-commissioning Reports.
- 13/05/2020 Practical Completion reached. All building and construction work including main building, loading dock, LPG gas tank installation, fire equipment and associated hardware, impact protection (around tank and fire equipment), lighting, security, fencing, and all hardstand areas have been completed on the site.

Works to be Completed:

- Commissioning of power supply.
- Final fit-off & commissioning electrical supply to equipment within the hazardous zones of the depot.
- Issue of hazardous dossier to Electrical Supply Authority.

The following Hazop recommendations have been implemented:

- The main LPG tank filling and withdrawal line were reduced from 80 mm to 50 mm (now reflected in updated P&ID).
- Install overpressure protection on LPG vapour compressor VC-20-01 with an interlock to trip the compressor below tanker PRV set pressure and VC-20-01 PRV (PRV-20-05) set pressure.
- Consider providing a knock out pot on the LPG recovery system vent line.
- Consider the scenario of liquid LPG venting through the cylinder recovery manifold vent line in the FHA.
- All P& I recommendations completed (as per attached P&ID).

The following Fire Safety Report recommendation has been implemented:

• Fire system was upgraded with 2 additional monitors...(This was previously communicated to DPIE).

The following Elgas essential works are now completed:

- Liquid traps on all storm water drains in hazardous areas
- Impact protection and line marking around the site
- Security provisions around the site
- Installation and pressure vessel inspection and certification of the 50 T LPG storage tank
- Completion of installation of the LPG pipework Pump, Vapour Compressor and Scales

Elgas Fit-off Works in Progress:

- Purging the 50 T bulk tank into service with LPG.
- Purging of the pipework with LPG.
- Introducing Liquid LPG into the installation and testing critical safety systems.
- DG Electrical Power Certification for introduction of power to the electrical equipment in the
- Final Hazardous zone.
- Calibration of the scales.

All these works listed above will be closed out using Elgas SOP and accredited contractors. These contractors will be the same who have already completed earlier installation work. Namely, Town & Country Electrical & LPG Services and Monaghan Electrical Pty Ltd. These are experienced contractors and duly accredited and all works will be completed under the strict supervision of Elgas Senior Project Engineer. Completion of these items will ensure that the installation is ready for normal depot operations.

Final Commissioning:

- Obtain Certification to introduce power and LPG to site
- Ensure all DG signage and instructions are installed

Proposed Actions prior to Start-up:

- 1. Induct and train all Depot Personnel
 - Drivers
 - Office staff
 - Contractors
 - Cylinder Fillers

2. Carry out Functionality Tests

- ESD Functionality
- Loading & Unloading LPG
- Scale & Cylinder Filling
- Test Station Area Functionality Test

3. Performance testing

Ongoing performance monitoring and testing will be required.

Additional requirements imposed by the Planning Secretary under Condition A2(b) – Applicant

Nil.

Additional requirements imposed by the Planning Secretary under Condition A2(b) – Elgas

Nil.

Conclusion

This report detailed that the applicant, Sovechles Nominees Pty Ltd, has submitted to the Department of Planning, Industry and Environment, evidential documentation as required, complying to all requirements relating to the Pre-Construction, Pre-Installation, Pre-Commissioning and Pre-Startup requirements as detailed in **Sections B3**, **B4** & **B5** of the relevant development consent and any additional requirements set by the Department.

This document also confirms that the Applicant and Elgas have met all other development consent conditions as detailed in Development Consent SSD 8448 and that the current development is built and will be operated as it was designed and within all the perimeters set in the current development consent.