

10 April 2026

Brisbane City Council
City Planning and Economic Development Services
Development Services
GPO Box 1434
Brisbane QLD 4001
Att: Ryan Casey - Senior Urban Planner - Planning Services South
Submitted via Email: DSPlanningSupport@brisbane.qld.gov.au

Dear Ryan

Re: Change Application (s78 of Planning Act 2016) - Industry - Schedule 2 (Regulated Waste Recycling, Reprocessing, Storage and Treatment; Waste Transfer Station and Storage of Dangerous Goods) - 15 Production Street Wacol QLD 4076 - L736 SL.9615 – Council Ref: A003336440

On behalf of the applicant, Pure Environmental Qld Regional Pty Ltd, please find below and attached the following response to Council's Further Advice Request dated 05 March 2026. The following is a response **all of the further advice** requested:

Further Advice:

Industrial Hazard and Risk

1) *The Dangerous Goods Report prepared by Riskcon Engineering (document RCE-25301_PE_DG_Final_17Nov25_Rev (0), dated 17/11/2025) has been reviewed. The report is identified as a chemical audit rather than a hazard and risk analysis, which does not assess the industrial hazard and risk implications of the proposed changes.*

It is acknowledged that the site has an approved storage quantity of combustible liquids (Class C1/C2) of approximately 2,000 tonnes, which exceeds the 500-tonne threshold in AO3 of the Industry code in Brisbane City Plan 2014, and that no change is proposed to C1/C2 storage volumes. Notwithstanding, the application proposes changes to other chemical storages on the site. These changes trigger the need for a hazard analysis report, as Council must understand the cumulative impact of the new storage non-combustible chemicals in combination with the existing on-site storage.

Accordingly, submit a hazard analysis report demonstrating compliance with PO3 of the Industry code and Council's Industrial hazard and risk assessment planning scheme policy. The report must assess the cumulative impacts of the total combination of existing and proposed chemical storage and include the type, quantity, location, class, and packaging group of all existing and proposed dangerous goods.

The following matters are to be addressed when preparing the hazard analysis report:

a) *Ensure the report is clear in describing storage levels VS maximum tank capacity storage levels. The report is to be based on the quantity of the chemical product stored.*

- b) Confirm whether Table 3-1 of the submitted chemical audit report is accurate having regard to the information presented in Table 4-2 of the report.
- c) Assess the waste streams identified in Table 3.1 of the air quality report and include these in the quantity of chemical products stored.
- d) Provide an accurate calculation for the threshold quantity of more than one hazardous chemical, to assess Schedule 15 of the Work Health and Safety Regulation 2011 to determine whether the activity is a Hazardous Chemical Facility under Part 7, Schedule 10 of the Planning Regulation 2017.
- e) Correct the error in Table 3-2 of the chemical audit report relating to Class 6.1 product storage, where inconsistent calculation results are presented.
- f) Ensure that all quantities in the report are consistently described, noting that Table 4-16 of the chemical audit report should be provided tonnes and not kilograms.

Response:

Combustible liquid storages had been proposed by the previous occupant of the site (JJ Richards & Sons Pty Ltd) and approved by Council as part of the originating development approval (BCC Ref: A003336440).

The applicant acknowledges that the ‘approved’ storage quantity at that time (approx. 2,000 tonnes - Class C1/C2) exceeds the current 500-tonne threshold in Acceptable outcome AO3 of the current Industry code under Brisbane City Plan 2014.

Pure Environmental has further reviewed the onsite ‘approved’ storages and quantity of combustible liquids (2,000 tonnes of Class C1/C2) and determined that the level of ‘approved’ combustible liquids (Class C1/C2) storages is **not** representative of onsite storages nor required by Pure Environmental for the ongoing development.

The ‘actual’ onsite storages for combustible liquids (Class C1/C2) has therefore been revised accordingly, with a revised **Table 4-2: C2 Combustible Liquid Storage Tank Installations and Capacities** now provided in the Dangerous Goods Report prepared by Riskcon (Rev 3, dated 1 April 2026 - refer to **Attachment 1**), as reproduced below:

Table 4-2: C2 Combustible Liquid Storage Tank Installations and Capacities

Location	Tank ID	Chemical	Orientation	Tank capacity (L)	Stored (T)*
TF1	T4	Oil	Vertical	67,000	50
	T5	Oil	Vertical	67,000	50
	T6	Wet oil	Vertical	67,000	44
	T7	Oil	Vertical	91,000	69
	T8	Oil	Vertical	91,000	69
Total:					282

*Based on liquid density of 790 kg/m³



Total combustible liquid storages have therefore been significantly reduced from the 'approved' volume of around 2,000 tonnes - to the revised storage of 282 tonnes in Tank Farm 1 (tanks T4 to T8), as well as being limited to Class C2 storages only. No Class C1 storages are now required or proposed.

The revised inventory has additionally been updated in **Table 1-1: Existing Hazardous Goods Inventory and Modified Inventory** and **Table 4-1: Storage Capacity Assessment Against Table 9.2.12.3.H of BCC Planning Scheme** in the revised Dangerous Goods Report prepared by Riskcon (Rev 3, dated 1 April 2026) – refer to **Attachment 1**.

The Dangerous Goods Report further states that:

*A threshold assessment against Table 9.3.12.3.H of the BCC Planning Scheme 2014 (Ref. [2]) was undertaken and it was determined the site does **not** exceed the chemical storage thresholds requiring a Preliminary Hazard Analysis.*

In consideration of the above and that the development no longer includes the storage of dangerous goods and combustible liquids above the volumes/quantities identified in Table 9.3.12.3.H of the Industry Code (Acceptable outcome AO3), the applicant and their consultants consider a Preliminary Hazard Analysis (PHA) no longer required.

The facility is below the Major Hazard Facility (MHF) threshold. Additionally, as the AQR (Aggregate Quantity Ratio) is less than 10% of the MHF threshold, the facility is not considered a hazardous chemical facility – as provided for in s.3.4 of the Dangerous Good Report – **Attachment 1**.

Matters a), b) and d) to f) of the Further Advice request have been incorporated into the revised Dangerous Goods Report, prepared by Riskcon (Rev 3, dated 1 April 2026) - refer to **Attachment 1**.

Item c) of Councils request (i.e. *Assess the waste streams identified in Table 3.1 of the air quality report and include these in the quantity of chemical products stored*) is **not** considered required, given that the Dangerous Goods Report does not require inclusion of regulated waste that is not a dangerous good.

Waste acceptance criteria is otherwise regulated via the site's environmental authority, subject to Condition W2.4 i.e.

Waste Acceptance Criteria

Only the following waste materials are permitted to be accepted for storage and/or treatment and transfer at this facility:

- (i) *waste oil (storage and treatment);*
- (ii) *oil and water mixtures or emulsions, or hydrocarbons and water mixtures or emulsions (storage and treatment);*
- (iii) *industrial oily water (storage and treatment);*
- (iv) *industrial sludge and solids (storage and treatment);*
- (v) *solid regulated waste (storage and treatment);*
- (vi) *package waste (storage and treatment);*

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- (vii) *organic liquid waste (storage and transfer);*
 - (viii) *PFAS contaminated wastewater (storage and transfer);*
 - (ix) *organic solvents (storage and transfer);*
 - (x) *paint wastewater (storage and transfer);*
 - (xi) *waste ethylene glycol (storage and transfer);*
 - (xii) *wastewaters (storage and treatment) in accordance with criteria provided in Table 2.1 – Wastewater Acceptance Criteria.*

Any component of the above regulated waste streams that is a DG has otherwise been included in the Dangerous Goods Report and need not be cross referenced to regulated wastes as defined under Schedule 9 of the *Environmental Protection Regulation 2019*.

Further Advice:***Staging***

- 2) *The proposed staging outcome is not clearly defined.*
 - a) *Submit a staging plan that provides clear delineation in red (or similar) of the extent of all changes that are proposed as part of Stage 2.*

Response:

As stated in the change application, Stage 1 and Stage 2 had been completed, in accordance with the approved plans – refer to **Attachment 2** for the approved / completed Stage 1 and Stage 2.

No changes are required to Stage 1 of the development conditions and / or plans, given that Stage 1 had been completed by the previous occupant (JJ Richards & Sons Pty Ltd) and subsequently superseded by the completion of Stage 2 works - which primarily included the addition of the new Bulk Products Building #2¹; additional tank storages in Tank Farm #1 and Tank Farm #2; and new Tank Farm #3².

The intent of the change application is to amend the operating hours for the Industrial Oily Water Treatment Plant (Condition 43); amend the Hazardous Goods Inventory(Conditions 50 and 51); and *replace* the approved Stage 2 drawings with the drawing set submitted with the application (refer to **Attachment 3**) to reflect:

- Repurposing storage / use areas and tank farm configurations to reflect the revised DG inventory and Pure Environmental current operations – including removal of the (former) G Force³ equipment from plans;

¹ It is understood that building footprint for Bulk Products Building #2 was reduced to meet fire safety requirements.

² Tank Farm #3 was not constructed and was replaced with the Class 3 Flammable storages to the north eastern part of the site for separation distances.

³ G force equipment was previously used to optimise recovery of oil from oily waste streams and to maximise feedstock available to the re-refinery (offsite) however has since been decommissioned

- Minor demolition works and a new firewall for Building - BLD. 4 – refer to Figure 4.21 Rev A;
- An additional screen wall (with FRL 240/240/240) adjacent to the flammable gases storage to the north of existing Tank Farm #1.

Changes to Stage 2 are otherwise all contained in Figure 4.4 Rev B, with key changes otherwise indicated in red-dashed lines, with building use areas and DG storages as indicated, noting that:

- The proposed changes do **not** involve any new buildings, additional GFA or additional impervious areas; and
- The proposed changes do **not** involve any new ERAs or changes to existing ERA Thresholds.

Changes to waste acceptance criteria and processes under the site's environmental authority have otherwise been separately approved by DETSI – see response to item 5 of Council's Further Advice request below.

Further Advice:

Air Quality Report

- 3) *The information provided is insufficient to fully identify the types of emissions generated on-site and to confirm that all potential emission sources have been fully considered in the assessment.*
 - a) *Submit an amended report to provide detailed information on both the existing and proposed activities undertaken on-site, including a description of any waste treatment processes.*

Response:

Trinity Consultants have liaised with Council's environmental officers in the preparation of a revised Air Quality Assessment (Report 247401.0137.R01V02) provided at **Attachment 4**, in response to the above request.

Further Advice:

Industrial Activities

- 4) *It is unclear whether the proposal involves changes to industrial processes or only changes to the type of waste received.*
 - a) *Clarify whether the application seeks to alter any existing industrial processes, or whether the proposal is limited to changes in the type of waste received on-site.*

Response:

Council's originating development permit was for a material change of use for *Regulated Waste Recycling, Reprocessing, Storage and Treatment; Waste Transfer Station; and Storage of Dangerous Goods*. Those approved uses currently operate from the site, with no new uses proposed as part of this change application.

The proposed change application relates to changes to the site inventory for DGs and operating hours for Stage 2 of the development, as well as associated amendments to Stage 2 approved plans, as previously discussed in item 2 above. Refer also to Air Quality Assessment (Report 247401.0137.R01V02) provided at **Attachment 4** with regard to current processes on site.

The proposed changes do **not** involve any new ERAs or changes to existing ERA Thresholds.

Site processes are otherwise regulated by DETSI under the site's environmental authority - EPPR01050513. See response to item 5 below concerning concurrent changes to the environmental authority, consistent with this change application.

Further Advice:

State Government Referral

- 5) *The proposed changes to waste streams may result in changes to Environmentally Relevant Activity (ERA) Material Change of Use approvals, Environmental Authorities, or permit conditions. While the applicable ERAs may remain unchanged, the proposed changes may not align with existing operational limitations under current permits.*
- a) *Refer the application to the State Government or provide evidence that this has occurred.*

Response:

At the time of lodgement of this minor change application, a separate and concurrent application was lodged with DETSI on 18 December 2025 - for a minor amendment (threshold) to the site's environmental authority (EA EPPR01050513), reflecting the proposed minor change application and supported with the same Air Quality assessment and same Relevant Plans, as submitted in support of this current minor change application.

The amendment to the environmental authority was determined by DETSI on 11 February 2026 – Ref: EPPR01050513.

A copy of the Amended (Project) EA is provided at **Attachment 5** for Council's information, with the current EA available on DETSI Public Register⁴. The amended EA additionally includes the submitted Stage 2 Proposed Site Layout (Figure 4.4 REV B).

End of Further Advice response.

⁴ <https://apps.des.qld.gov.au/public-register/search/ea.php>

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours Faithfully

Michael McMahon
Convergent247 Pty Ltd

Encl. Attachments

- Attachment 1** Dangerous Goods Report prepared by Riskcon - Document No. RCE-25301_PE_DG_Final_1Apr26_Rev(3) dated 1 April 2026
- Attachment 2** Approved Site Plans State 1 and Stage 2 – BCC Ref: A003336440
- Attachment 3** Relevant Plans (10.12.2025) (annotated in Red)
- Attachment 4** Air Quality Assessment, prepared by Trinity Consultants Australia – Report 247401.0137.R01V02 dated 7 April 2026
- Attachment 5** Amended Environmental Authority – EPPR01050513