



DGS PLANNING REPORT

ADVERTISED PLAN

**Dangerous Goods Storage and Planning
Legacy Project Management Pty Ltd
165 Williamson Road, South Morang – Data Centre**

Job number F0004061
12th August 2026

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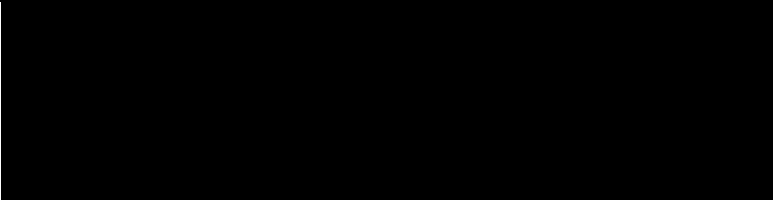
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APPENDICES

A Figures and Site Images

- Figure 1 Site Location Plan
Figure 2 Proposed Site Development Plan

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1.0 INTRODUCTION

Focus Environmental Pty Ltd (Focus) was engaged by Legacy Project Management Pty Ltd (the client) to complete an initial review and high level compliance advice to assist with proposed works including above and below ground fuel storage tanks, internal uninterrupted power supplies (UPS) and backup generators and associated day-tanks located at the proposed South Morang Data Centre, 165 Williamsons Road, South Morang (the site).

1.1 PURPOSE

The purpose of this document is to provide high-level, strategic planning advice around key items as identified specifically in relation to fuel storage, battery storage, overall dangerous goods regulatory strategic planning:

- Development Facilitation Program for Data Centre: 165 Williamsons Road, South Morang.
- Requirements within Clause 53.22 of the Whittlesea Planning Scheme
- A referral to WorkSafe pursuant to Clause 66.02-7 is required, as the storage of fuel will exceed the fire protection quantity of 100KL mandated by the Dangerous Goods (Storage and Handling) Regulations 2022.

1.2 REGULATORY FRAMEWORK

The following regulatory framework and guidelines / codes of practice were considered during the preparation of this document:

- *Environment Protection Act, 2017;*
- *Occupational Health and Safety Act, 2004;*
- *Publication 1698, Liquid Storage and Handling Guidelines, June 2018, Victoria EPA;*
- *Publication 1700, Preventing liquid leaks and spills from entering the environment (fact sheet), June 2018, Victoria EPA;*
- *AS1940:2017 The storage and Handling of Flammable and Combustible Liquids;*
- *Dangerous Goods (Storage and Handling) Regulations 2022;*
- *Dangerous Goods Act, 1985;*
- *Code of Practice for the Storage and Handling of Dangerous Goods, 2022, WorkSafe Victoria; and*
- *AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles.*

1.3 EXECUTIVE SUMMARY

The site based on the volume of fuel and battery storage exceeds the following:

- Placarding Quantities
- Manifest Quantities
- Fire Protection Quantities

2.0 PROPOSED DEVELOPMENT

The proposed development plans assessed here are in specific reference to the fuel and battery storage only. We note the plans are currently of an indicative nature only in relation to specific items and their locations.

The site is currently proposed to house 16 x 110,000L tanks within the basement / lower ground level floor. The site layout plan is yet to be finalised. These tanks are for the purposes of supplying back-up generators within the data centre building plant room(s).

Underground product supply lines will connect the tanks to the plants room day tanks, likely to be one day-tank (per generator, 84 in total) of 1,000 L capacity. Each day tank will have a return product line to the main tanks in the event of over filling or an emergency.

Regional Setting

The sites groundwater is at approximately 5 – 10 m below ground level, with notable surface (seasonal) water features including the Great Eastern Way Drain, located approximately 230 m north west of site, which flows into the Henderson Wetlands.

Particular attention needs to be paid to these in planning the fuel tank bunding, stormwater control and surface elevation and contours of the final landscaping. This would include sufficient elevation to avoid any ingress of water into the general truck turnaround area used for refuelling.

We note that as per the attached planning report, the site, nor surrounds, are within the 'land subject to inundation' overlay.

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3.0 FUEL STORAGE TANKS

Tank types

Sixteen tanks, each of 110,000 L volume for a total potential capacity of 1,650,000 L. Please note regulatory volumes are based on capacity, not actual real time volumes.

Product

- Diesel
- Combustible liquid C1 (flashpoint above 60°C and below 93 °C)

The diesel product proposed to be storage is classified as a combustible liquid (not flammable) based on the flash point, as per AS1940-2017.

Volumes / Notification

- *Dangerous Goods Regulations 2022* – Schedule 2 Quantities of dangerous goods, Item 7 - Column 6, exceeding total capacity of 100,000 L – *fire protection quantity*.

Based on the volume exceeding the fire protection quantity, Item 7 in Column 6 of Schedule 2, the following below requirements are triggered, including placarding, manifest and fire protection.

Requirements

- Establish a fire protection system for the premises
- Referral to fire engineer
- Notification to emergency services authority
- Emergency (incident) management plan and risk assessment
- Bunding
- Dangerous goods register / manifest quantity / placarding

The emergency management plan, risk assessment, dangerous goods register, manifest and placarding are items which may be addressed in more detail later in the construction phase, as the specifics of these are linked to items on final endorsed plans and completed as build's drawings. Referral to the fire engineer should be undertaken at the early planning stage.

Manifest

- Quantity, location and type of dangerous goods stored (general information)
- How are the Dangerous Goods stored (IBC or other)
- Plan of Premises
- Manifest storage information kept at entrance to site, accessible by emergency services.
- Site emergency contact information including after hours (2 persons minimum)

Manifest requirements may be dealt with subject to endorsed plans and final as built plans.

Placarding

- As per Schedule 4, *Dangerous Goods Regulations 2022*
- Includes at site entry (outer warning placarding) and placarding for dangerous goods stored in bulk

Placarding requirements may be dealt with subject to endorsed plans and final as built plans.

Fire Protection Quantity

The following additional requirements are also triggered:

- (a) Initial design: You must obtain written advice from the emergency services authority in relation to the initial design of the fire protection system and have regard to that written advice when developing the system.
- (b) Altering design: You must obtain written advice from the emergency services and have regard to that written advice before altering the fire protection system.
- (c) Modifications to premises: You must also obtain written advice from the emergency services authority in relation to any proposed modifications to the:
 - buildings or structures on the premises
 - types or quantities of dangerous goods stored or handled at the premises, or
 - plant or processes associated with the storage or handling of dangerous goods on the premises — that will require a review of the risk control measures. You must have regard to that written advice when undertaking the proposed modifications.

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Additional Duties

Consultation

An occupier of premises where dangerous goods are stored and handled, so far as is reasonably practicable, must consult with persons engaged by the occupier to work at the premises whose health or safety is likely to be affected by the dangerous goods, and any health and safety representative of those persons, regarding—

- (a) induction, training, information provision, hazard identification and risk control; and
- (b) any proposed alteration to structures, plant, processes or systems of work that are likely to increase the risk to those persons.

Induction, information, training and supervision

- (1) An occupier of premises where dangerous goods are stored and handled must ensure that a person involved with the storage and handling of dangerous goods at the premises, and any health and safety representative of that person, is provided with induction, information, training and supervision that is—
 - (a) in a language or manner appropriate to the person; and
 - (b) relevant to the tasks undertaken by the person and the risks associated with those tasks.

- (2) An occupier of premises where dangerous goods are stored and handled must ensure that the induction, information and training provided under subregulation (1) includes instruction in relation to—
- (a) the nature of the hazards and properties of the dangerous goods; and
 - (b) the processes used for the identification and control of the risks associated with the person's tasks; and
 - (c) the purpose, use and maintenance of the measures for the control of those risks; and
 - (d) the systems of work and the conduct of persons at the premises, in so far as the systems of work and conduct of persons may affect safe storage and handling of dangerous goods; and
 - (e) the operation of the emergency plan for the premises and any procedures and equipment that may be required for use in the event of an emergency; and
 - (f) the proper use and fitting of personal protective equipment.

Incidents

Response to emergencies

- (1) An occupier of premises where dangerous goods are stored and handled must respond to an emergency at the premises by ensuring that—
- (a) immediate action is taken to assess and control any risk associated with the emergency, including making any plant or equipment associated with the emergency safe so far as is reasonably practicable; and
 - (b) only persons essential to carrying out the action referred to in paragraph (a) remain in the vicinity of the emergency; and
 - (c) the risk to each person engaged by the occupier at the premises to carry out the action referred to in paragraph (a) is reduced so far as is reasonably practicable.

Considerations During Planning should include, but no limited to the following:

- Working pressures and structural stresses
- Site conditions such as topography, usage of adjoining areas, or the risk of natural disasters, e.g. flood prone
- Design of plant. Equipment, and operating methods, so far as to minimize fire and accident risks and the possibility of errors or misunderstanding by staff
- Specific design for emergencies, particularly firefighting facilities. Needs to take into account the nature and quantity of liquids stored, the layout of the storage area, access through or around walls or other barriers, type of construction of the buildings, the type and means of operation of any fire protection system
- Safe access to and egress from all working locations
- Avoidance of ignition sources
- Ventilation for vapour dispersal, taking into account the possible effect of nearby structures, excavations, embankments, and the like
- Points of vapour relief
- Spill control measures to avoid contamination of soil and water

- Tank refuelling points located within bunded area
- Truck parking area adjacent within general bunded area of carpark
- In-tank leak detection systems
- Capability to release any tank bund water post validation as required

Separation distances (including distances between internally stored dangerous goods and protected places), refuelling points, bunding structure (roof / unroofed) are items to be considered within early planning as these may have permitting implications and are required on endorsed plans.

In-tank leak detection, bunded water-testing capabilities for example are items that should be installed and considered pre-primary construction.

Primary Tank Bunding for External Tanks Option (not likely)

- Minimum of 110% of the volume of the largest container for bulk storage. If two or more tanks are operated as a single unit, then the capacity of all such tanks should be considered when calculating the volume. A minimum additional volume of 10% of the second largest tank is suggested or 25% or both whichever is greater.
- Consideration to the distance between tank side and height of bund, minimum distances apply.
- Roofed structure with overhang to exclude rainwater (not walled aside from bunding)
- Open, with consideration of the secondary containment area is not undercover then additional volume will be required to deal with estimated rainfall in the event that a leak or spill occurs during a rain event or before rainwater has been removed from the secondary containment area. In sizing the volume required by rain a 1 in 20-year, 24-hour storm event could be used or 95th percentile 5-day rainfall depth (mm).
- Fire water capture within bund with provision for testing and release of uncontaminated water, capture and disposal of contaminated waters.
- Stormwater isolation valves in event of spill, including from fuelling truck parked outside of primary tank bunded area.

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In general, a roofed structure overhanging the bunded sides to exclude rainwater from the bund is the simplest to manage in an operational facility. Bunds that are open to rainwater are therefore subject to filling during significant rain events, requiring monitoring of water prior to discharge. They also require larger bunds in order to accommodate product loss and potential rainwater at the same time.

General Operational Maintenance

- Daily / weekly / Monthly / Annual check lists

Post construction and prior to initial commissioning.

Underground / Basement Fuel Storage Tanks Option (preferred)

- Access Pits for in Tank Maintenance.
- Cathodic Corrosion Protection.
- Tank Pit Monitoring Wells if Below Ground

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- Leak detection system as per EPA Publication 888.4,
- Specifically, which is rated to detect a release of 0.76 L/hour (or a release of 18 L/day), with greater than 95% confidence (and less than 5% false positive);

Remote Filling Point Considerations

The remote fill point location for the proposed basement fuel tanks will need to consider the following:

- Adequate access for tank trucks to access.
- Bunding to the refuelling zone.
- Stormwater isolation valves in event of spill including from fuelling truck parked outside of primary tank bunded area.
- The volume of the expected tanker truck is to be considered within the bunding calculations.

Basement Plant Room

- 84 x backup diesel generators, each requiring 17,000 L of on-site storage, plus redundancy
- 84 x 1,000 L day tanks fed from primary tanks
- Self-bunded and each likely to be fire-separated from each other
- Leak detection and overfill alarms, including product lines servicing the plant room
- External to building fabric vent lines and exhausts

Diesel Generators are likely to be located on north east facade, containing generators and day tanks. Day tanks will require pumps which return fuel to the primary tanks in the event of overfilling or emergencies.

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4.0 UNINTERRUPTED POWER SUPPLIES (BATTERY)

The proposed development will also house uninterrupted power supply units to automatically operate between any power failures and generator start-ups. The final location of these units is yet to be determined, however, likely to be located on the floor between generators, with each in their own fire-rated room. Each UPS is to provide five minutes of backup and is intended to comprise lithium ferro phosphate batteries. Total quantities of UPS batteries are estimated at 154, totalling 1.25 MVA.

Consideration will be given to the particular risks and storage requirements of each type pending final decisions on number and location. These units will fall under *Class 9: Miscellaneous dangerous substances and articles including environmentally hazardous substances*.

Will require compliance with AS/NZS 3000:2018 and 3000.2 and local government regulations when installing lithium ferro phosphate batteries.

- **Location:** Store batteries in a dedicated area away from flammable materials, heat sources, and direct sunlight.
- **Ventilation:** Ensure good ventilation in the storage area to prevent gas buildup and heat accumulation.

- **Temperature / Humidity Management:** Monitoring temperature is important. The location should maintain temperatures within the limits specified by the manufacturer and control humidity levels to prevent condensation.
- **Emergency Plan:** manage potential emergencies such as a battery fire
- **Accessibility:** access point to access batteries for management and emergencies
- **Fire-Resistant Storage:** Dedicated, fire-resistant storage cabinets. The enclosure should have ventilation to prevent the accumulation of gases. Ensure the system is equipped with a fire suppression system.
- **Emergency Shutdown:** Provide an accessible emergency shutdown switch. Ensure clear labelling and instructions for emergency procedures. Documentation should include detailed installation, operation, and maintenance instructions, along with clear labelling for emergency shutdown procedures
- **Regular Inspections:** Conduct regular inspections to ensure the system remains in good condition. Check for signs of wear, corrosion, or damage.

Site Sub-Station

- General consideration in sub-station location in a location not directly adjacent to the tank farm /fuelling area, product supply lines and vent lines.
- This would also include electrical switch rooms within the building.

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5.0 SITE RISK ASSESSMENT

A site risk assessment should be conducted prior to the submission of final plans for endorsement and construction issue. This will serve to identify any potential issues that would require final adjustment. Risk assessment process should apply to each segment of the development.

The risk assessment can help to detect and correct any potentially hazardous situations and is best carried out using systematic methods including safety studies and check lists.

Risk Format

The following section provides an example risk assessment matrix that may be used when determining risk aspects for the site and for particular activities, most specifically fuel storage above fire protection quantities.

Identify the environmental aspects relevant to the site such as the adjacent waterway and retarding basin. Generic construction related aspects including noise, dust, erosion and sediment, waste and chemicals will be covered in the general construction environmental management plan.

Based on the issues, document the likelihood and consequence of an aspect occurring.

Likelihood: What is the likelihood that the aspect will have an impact on the environment?

Certain: Will occur at a frequency greater than every week if preventative measures are not applied.

Likely: Will occur more than once or twice but less than weekly if preventative measures are not applied.

Unlikely: May occur once or twice during the project if preventative measures are not applied.

Rare: Unlikely to occur during a project even if controls are missing.

Potential Impact: How severe will the potential impact be?

Catastrophic:

- Significant damage or impact on environment or community
- severe and/or persistent waterway/ stormwater quality pollution
- deaths of fauna/ flora
- widespread and/or significant changes to ecosystems
- soil contamination over an area $>10 \text{ m}^2$, contamination of off-site soil or contamination of soil with prescribed or hazardous materials
- widespread community impact resulting in illness, injury or inconvenience
- loss or destruction of archaeological/heritage places, sites or objects
- receiving fine(s) is a certainty or works will be halted

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Major:

- Major adverse environmental or social impacts
- medium-term, noticeable / measurable change in waterway / stormwater quality
- isolated deaths of non-vulnerable fauna / flora species
- noticeable, localised changes to ecosystems
- soil contamination over an area 1 m² – 10 m² (excluding contamination of off-site soil or contamination of soil with prescribed or hazardous materials)
- annoyance or nuisance to community
- frequent, partial damage or off site movement of archaeological/heritage places, sites or objects
- fining likely or works may be halted

Moderate:

- Moderate undesirable environmental or social impacts
- localised, short term noticeable/measurable change in waterway/ stormwater quality
- short term, minor changes to ecosystems
- soil contamination over an area <1 m² (excluding contamination of off-site soil or contamination of soil with prescribed or hazardous materials)
- some annoyance or nuisance to community
- isolated, partial disturbance or movement of archaeological/heritage places, sites or objects
- fines unlikely

Minor:

- No or minimal adverse environmental or social impacts
- no measurable / unlikely effect on waterway / stormwater quality and ecosystems
- no or isolated community complaints
- no or isolated events where areas of soil <1 m² is contaminated (excluding contamination of off-site soil or contamination of soil with prescribed or hazardous materials)
- no or unlikely impact on archaeological/heritage places, sites or objects
- no likelihood of being fined

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Using the table below determine the level of risk based on the likelihood of occurrence and the potential consequence.

Risk Consequence and Likelihood

	Consequence			
Likelihood	Rare	Unlikely	Likely	Certain
Catastrophic	Medium	Significant	Significant	Significant
Major	Medium	Significant	Significant	Significant
Moderate	Low	Medium	Significant	Significant
Minor	Low	Low	Medium	Medium

6.0 PRELIMINARY RISK ASSESSMENT

A Preliminary Hazard Assessment (PHA) for the site should take into consideration the potential risks associated with underground fuel storage tanks and internal uninterrupted power supplies (UPS).

Key points potential risk sources:

- Potential hazards associated with the fuel storage tanks, such as leakage or explosion, and measures to mitigate these risks.
- Risks associated with the UPS, such as electrical hazards or fire, and steps to minimise these risks.
- Emergency response procedures in the event of an accident or incident.
- Compliance with relevant regulations and standards for fuel storage and electrical systems.
- Regular maintenance and inspection schedules to ensure the safety of the systems.
- This assessment should be regularly reviewed and updated regularly to ensure ongoing safety.

The following are potential hazards that the fuel storage infrastructure and uninterrupted power supplies (UPS) at the site that may pose to the human health and the environment:

1. **Soil Contamination:** Fuel leakage from the storage tanks / battery storages may contaminate the soil, which can lead to long-term environmental damage. This could also affect local flora and fauna, potentially leading to loss of biodiversity.
2. **Groundwater Contamination:** Leaked fuel could also seep into the groundwater, impacting water quality and potentially making it unsuitable for human consumption or agricultural use.
3. **Air Pollution:** Fuel leaks can release volatile organic compounds (VOCs) into the air, leading to poor local air quality. In addition, emissions from backup generators, if not properly managed, could also contribute to air pollution.
4. **Noise Pollution:** Backup generators can generate noise, potentially affecting local wildlife and human communities.
5. **Disruption of Local Ecosystems:** The construction and operation of the data centre could disrupt local ecosystems, affecting habitat availability for local wildlife.
6. **Climate Change Impact:** Data centres consume a significant amount of energy, which could contribute to greenhouse gas emissions and climate change if renewable energy sources are not used.

These potential hazards should be carefully considered and mitigated through appropriate design, construction, and operational practices.

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Risk table of potential hazards associated with fuel storage infrastructure and UPS at the site:

Table 1: Hazard Table

Hazard	Potential Consequence	Likelihood	Risk Rating
Fuel Leakage from Storage Tanks / UPS	Soil & Groundwater Contamination	Low	Medium
Fuel Storage Tank or UPS Explosion	Injury/Loss of Life, Property Damage	Low	Medium
Backup Generator Emissions	Air Pollution, Health Impacts	Low	Medium
Noise Pollution from Generators	Disturbance to Wildlife & Local Community	Low	Low
Disruption to Local Ecosystems	Loss of Biodiversity	Medium	Medium
Climate Change Impact	Long-term Environmental Damage	Medium	Medium

In the table above:

- *"Likelihood" refers to the probability of the hazard occurring. It is typically categorised as Low, Medium, or High.*
- *"Risk Rating" is determined by a combination of the severity of the potential consequences and the likelihood of the hazard occurring. It is used to prioritise risks and determine appropriate mitigation measures.*

This table provides a starting point for identifying and assessing potential hazards and should be expanded upon and regularly reviewed as part of a comprehensive environmental risk management strategy.

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Additional points to consider:

1. **Waste Management:** Consider the potential hazards associated with the disposal of waste materials from the data centre, including electronic waste and hazardous materials.
2. **Construction Hazards:** If the site is still in the construction phase, consider potential hazards associated with construction activities, such as noise, dust, and traffic.
3. **Natural Hazards:** Consider potential natural hazards in the area, such as flooding or bushfires, and how these might impact the data centre and the surrounding environment.
4. **Socio-economic Impacts:** Consider potential impacts on the local community, such as changes to property values, traffic congestion, or impacts on local businesses.
5. **Energy Use and Efficiency:** Evaluate potential hazards associated with energy use and efficiency, including the potential for power outages, energy waste, and greenhouse gas emissions.
6. **Regulatory Compliance:** Ensure that all operations are compliant with relevant local, state, and federal regulations and standards, including environmental protection laws and occupational health and safety standards.

It is important to note that a detailed preliminary hazard assessment should be considered and is a living document that should be updated regularly to reflect changes in operations, new information about potential hazards, or changes in regulatory requirements.

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7.0 STATEMENT OF LIMITATIONS

This report has been prepared for Legacy Project Management Pty Ltd for the purpose set out herein. The services performed by Focus Environmental Pty Ltd have been conducted with the level of quality and expertise generally associated with activities of this nature by an environmental consulting practice.

Responsibility is disclaimed for any loss or damage other than to Legacy Project Management Pty Ltd. Focus Environmental Pty Ltd does not accept any responsibility suffered by any other party whatsoever including, but not limited to, negligence on the part of Focus Environmental Pty Ltd.

This report is for the use of Legacy Project Management Pty Ltd and its appointed agents. Focus Environmental Pty Ltd does not intend that any other person accept or rely upon it. This report shall only be presented in full, except where written approval with comments is provided by Focus Environmental Pty Ltd.

The information contained in this report is considered accurate on the date of issue in accordance with the current conditions of the site. Whilst the report is accurate to the best of our knowledge and belief, Focus Environmental Pty Ltd cannot guarantee completeness or accuracy of any descriptions or conclusions based on supplied information, including but not limited to, information provided by previous site assessors and data arising from investigations by any other third party.

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AS1940:2017 The storage and Handling of Flammable and Combustible Liquids

Dangerous Goods (Storage and Handling) Regulations 2022

Dangerous Goods Act, 1985

EPA Publication 888.4 The design, installation and management requirements for underground petroleum storage systems (UPSS), August 2015.

Code of Practice for the Storage and Handling of Dangerous Goods, 2013, WorkSafe Victoria

AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles

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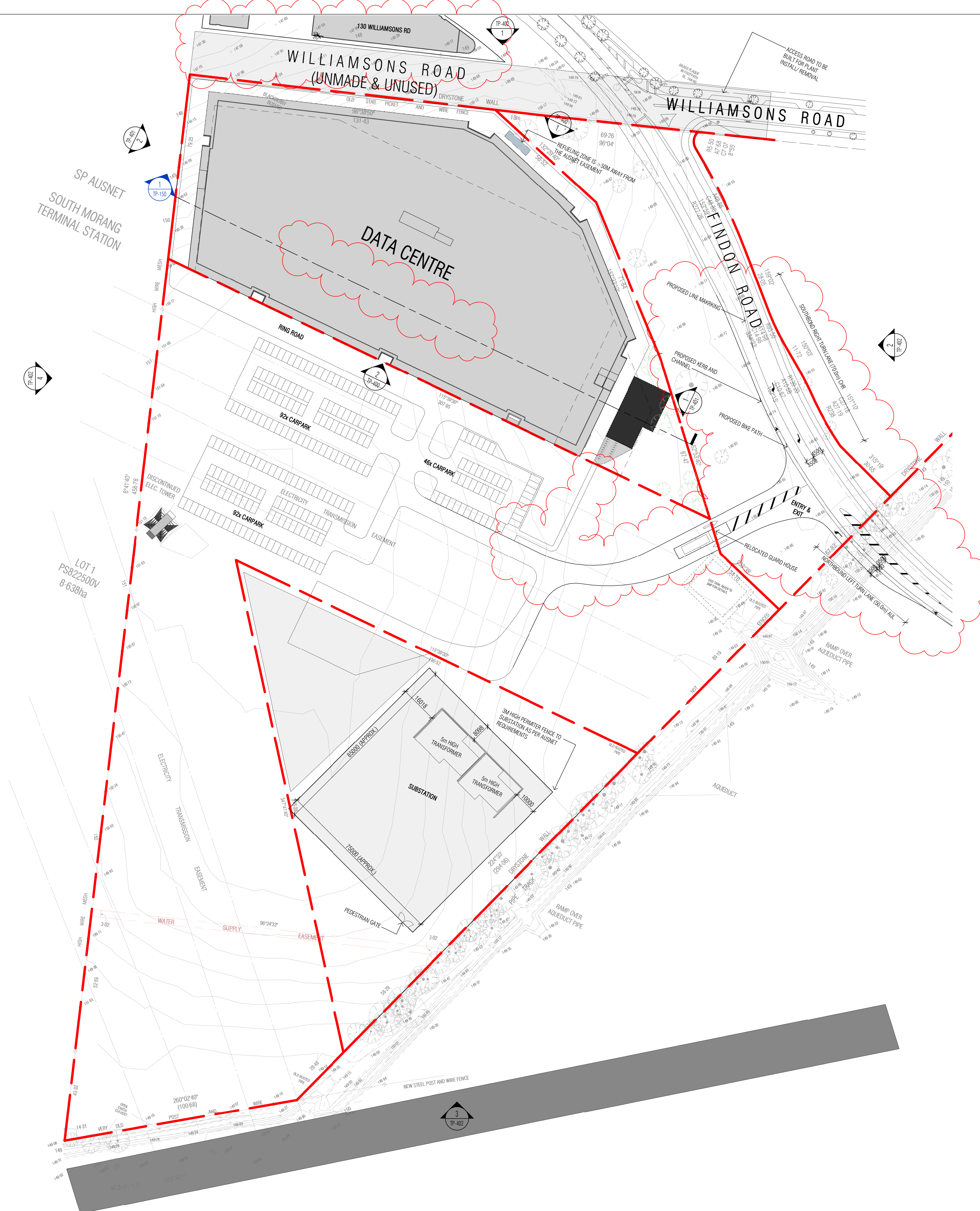
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AREA SCHEDULE

<u>BUILDING A</u>	
	GFA
BASEMENT	18098 m ²
GROUND FLOOR	18098 m ²
LEVEL 1	18098 m ²
LEVEL 2	18098 m ²
LEVEL 3 ROOF PLANT	16365 m ²
BUILDING A TOTAL GFA	88757 m²

E W E R T —
— L E A F

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PRELIMINARY - NOT FOR CONSTRUCTION

PROJECT
165 WILLIAMSON'S ROAD
South Morang, Vic 3752

DRAWING TITLE
SITE PLAN

SCALE: As indicated
PAGE: A1
DRAWN: JY

DATE: 04/15/25
PROJECT NO:
M24062

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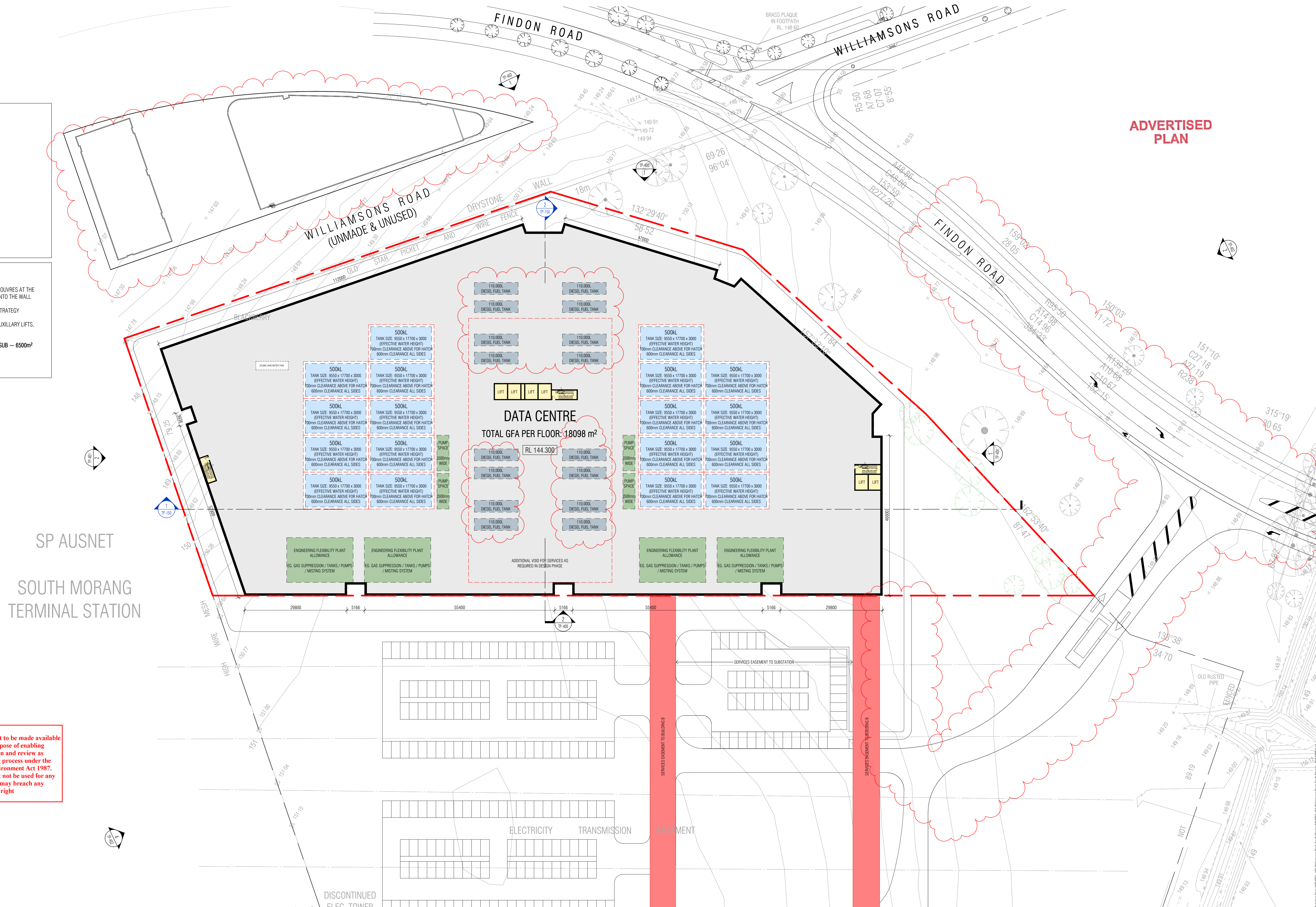
Journal of Interpersonal Violence 26(10) 1978-1994
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GENERAL NOTES

1. FACADES TO BE SEALED - WITH LOUVRES AT THE END OF EACH GENERATOR - FIXED INTO THE WALL PANEL.
2. RETICULATION TBC WITH FINAL STRATEGY
3. TIER 4/IV
4. CIRCULATION SPACES, ADMIN, AUXILIARY LIFTS, ACCESS IS TBC
5. TEST FIT ONLY
6. AREA FOR AIS - TRANSMISSION SUB ~ 6500m²
7. DC IT LOAD - 192MW

200-250 (MVA) DC SITE

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— L E A F

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PROJECT

165 WILLIAMSONSONS ROAD

South Morang, Vic 3752

DRAWING TITLE
BASEMENT FLOOR PLAN

SCALE: As indicated
PAGE: A1
DRAWN: JY

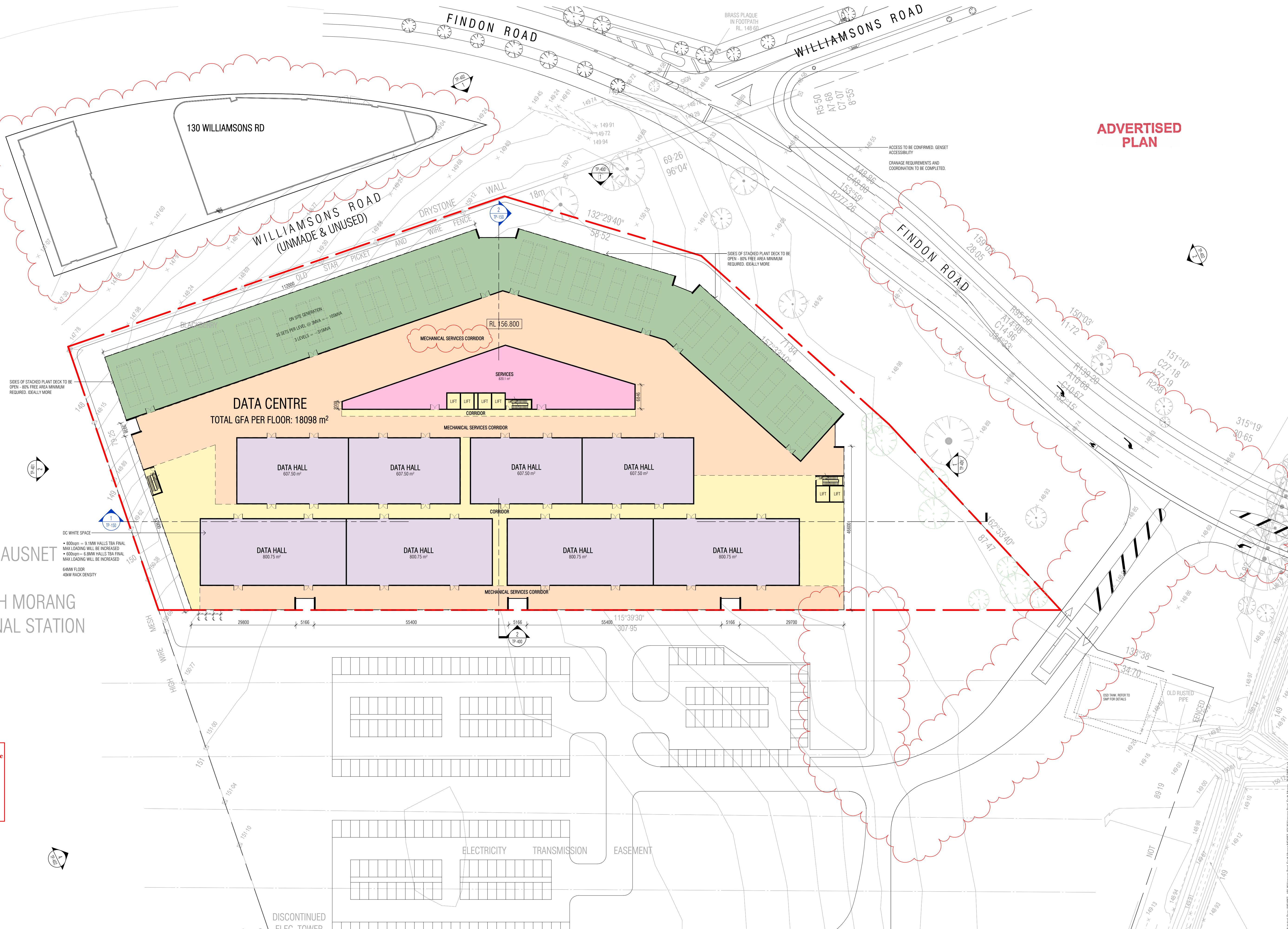
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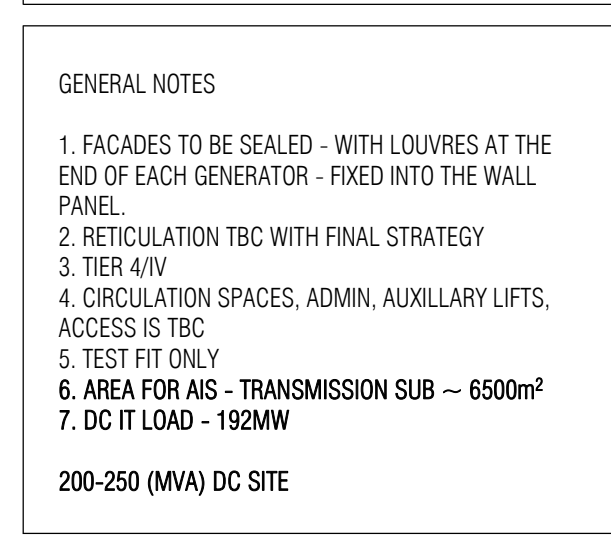
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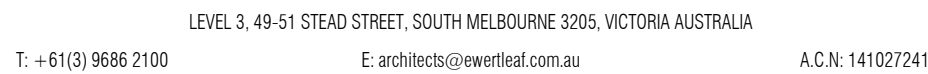


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