

Technical Note

Project title Bromelton Energy and Resource Centre
Job number 293683-00
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Date 10 July 2026
Subject RFI 7 & 10 – Dangerous Goods

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No. 7	Issue: Dangerous goods near rail corridor
Information Requested The Pavement Impact Assessment report submitted as part of the application material (reference BERC-ARUBNE-ENRI-RPT-0001, revision C) has not adequately addressed dangerous goods in relation to the railway corridor or the prelodgement advice given about this matter. In particular, the report only addresses Major Hazard Facilities (under State Code 21) and Work Health and Safety requirements. Table 2 does not adequately set out the quantities and hazardous chemical types/classes as per Table 5.2 of the Model Planning Scheme Development Code. It is likely that some of the dangerous goods thresholds set out in AO26.1 of PO26 of State Code 2 – Development in a Railway Environment of the State Development Assessment Provisions will be exceeded such as for diesel. The proponent is requested to amend the Hazards and Risks Assessment to demonstrate how the proposed development will comply with PO26, Table 2.1, of State Code 2: Development in a Railway Environment of the State Development Assessment Provisions and Section 2.6 of the Guide to Development in a Transport Environment: Rail. In particular, provide details of the components or aspects of the proposed development likely to involve the storage and handling of dangerous goods. The applicant should confirm the types and quantities of dangerous goods to be stored and handled on the site and whether these are above the threshold quantities identified in AO26.1, being Table 5.2 of the Model Planning Scheme Code for Hazardous Industries and Chemicals. In particular, the classifications of hazardous chemicals and the measurement units used for quantities should allow a direct comparison with Table 5.2 of the Model Code. Where the thresholds are exceeded, the applicant is required to provide information demonstrating how the proposed development will be designed and constructed to minimise the impacts of a fire, explosion, spill, gas emission or dangerous goods incident on the railway corridor. This should consider that fire-fighting infrastructure will be limited to on-site water storage and therefore potentially limited in capacity, increasing risk. Provide a Registered Professional Engineer of Queensland (RPEQ) certified risk assessment in accordance with Chapter 2.6 – Dangerous Goods and Fire Safety and Appendix 1 – Development Risk Assessment Guide of the Guide to Development in a Transport Environment: Rail, demonstrating how measures will be incorporated into the development design to minimise the identified risks. This should address the following risks, amongst other identified risks: • minimising or controlling the outbreak of fire • controlling smoke and/or gas release dispersion	

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	• minimising heat build-up in structures • limiting the possibility of structural components being blast damaged • providing stability or contingency measures in the proposed development • providing safe emergency access and egress to and from the railway corridor • ensuring effective containment and clean-up of dangerous goods incidents. The risk assessment should consider that the railway corridor can be a source of ignition, for example, due to overhead line equipment, rollingstock wheel to rail contact and braking, exhaust sparks from locomotive engines, heat from locomotive engine parts and rollingstock wheels, and from track maintenance work such as slashing. The risk assessment should include consequence contour mapping for each type of safety incident showing the maximum hazard extent in relation to the railway corridor. The storage and handling of goods will be required to comply with relevant Australian Standards. An Emergency Response Plan (ERP) should be provided that: • identifies the emergency contact details for the railway manager (ARTC). • includes an escalation process where the railway manager is required to be immediately notified of any incident so that rail operations can be appropriately managed. establishes an emergency response procedure for the railway corridor to be applied during incidents/emergencies in agreement with the railway manager.

A Registered Professional Engineer of Queensland (RPEQ) certified Rail-Specific Risk Assessment has been prepared in accordance with Chapter 2.6 – Dangerous Goods and Fire Safety and Appendix 1 – Development Risk Assessment Guide of the *Guide to Development in a Transport Environment: Rail*. This assessment is provided as Appendix B to the Hazards and Risks Assessment Rev D.

The Hazards and Risks Assessment has been updated to identify the types and quantities of dangerous goods proposed to be stored and handled on site, including classification in accordance with relevant standards. This allows direct comparison with the threshold quantities specified in AO26.1 (Table 5.2 of the Model Code for Hazardous Industries and Chemicals). Where relevant thresholds are exceeded, these have been clearly identified and assessed. Refer to Section 4 – Table 5.

The Rail-Specific Risk Assessment identified that no credible fire scenario exists in which diesel can impact on the rail corridor. However, in response to the comment, a consequence-based risk assessment has been undertaken, including contour mapping for diesel, which further demonstrates that credible incident scenarios (including fire, explosion and spill events) do not pose an unacceptable risk to the railway corridor (refer Section 4 – Figure 3). A supporting drawing has also been prepared to illustrate the spatial separation between hazardous goods storage areas and the railway corridor (refer to Appendix C of Hazards and Risks Assessment Rev D).

As discussed and agreed with Transport and Main Road in a meeting on 26 May 2026 the Hazards and Risks Assessment (refer Section 4.1.5) has been updated to state that an Emergency Response Plan (ERP) will be prepared prior to operation, in consultation with the railway manager (ARTC). The ERP will include:

- emergency contact details for the railway manager
- an escalation and notification process for incidents with potential to impact rail operations
- emergency response procedures for incidents affecting the railway corridor

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No. 10	Issue: Hazardous substances
Information Requested The Planning and Assessment Report (dated 18 February 2026, revision 5) lists the following goods stored in quantities over 200kg/200L: hydraulic oil/lubrication oil, activated carbon, 25% aqueous ammonia solution, propane/acetylene, sodium hydroxide, hydrochloric acid, air pollution control residue (including stabilised curing/cured APCr) and diesel. The Seqwater Development Guidelines (October 2024 version), Acceptable Outcome AO28.2, requires that dangerous/hazardous substances stored in quantities above 200kg/200L maintain a minimum 100m setback to all watercourses. Although the planning and assessment report/Hazard and Risk Assessment report (reference BERC-ARU-BNE-ENRI-RPT-0001, dated 22 January 2026) denote the quantities of hazardous materials to be stored on site and the risk management measures associated with their storage, it remains unclear where these materials are proposed to be stored within the facility. The architectural plans do not clarify storage locations in relation to watercourses identified on site, nor how these materials will be stored specifically, with only general references to Australian Standards included. The proponent is requested to provide additional information to demonstrate compliance with Acceptable Outcome AO28 of the Seqwater Development Guidelines (2024), including: • Detailed drawings of storage facilities • A plan showing the specific location of diesel within the building • Building components (i.e. bunded edges, floor pad permeability rating etc) • Secondary containment methods with at least 110% spill recovery capacity, or industry standard, whichever is greatest • Product details for storage vessels • Procedures and notifications in the event of a spill • Spill kit contents, location and signage.	

Response

A detailed drawing has been prepared identifying the location of all dangerous goods storage areas within the facility, including diesel storage, and their spatial relationship to mapped watercourses (refer to Appendix C of the Hazards and Risk Report Rev D). This demonstrates that the siting of hazardous materials has been considered in the context of the Seqwater Development Guidelines, including setback requirements under AO28.2. A Site Specific Water Quality Assessment has also been prepared to review

In addition, a Site-Specific Risk Assessment –Water Quality (refer Appendix D of the Hazards and Risk Report Rev D) has been prepared address PO28 of the Seqwater Development Guidelines. The Site Specific Risk Assessment finds that the facility “is designed so dangerous goods, hazardous substances or environmentally hazardous materials are stored and handled in a manner that minimises the potential for the release of hazardous materials and chemicals to drinking water source areas during a potential contamination event”, consistent with AO28.4.

At the current stage of design, the project has not progressed to the level of detail required to confirm specific building components and storage specifications, including:

- detailed bund design (e.g. bunded edges, floor permeability ratings)
- engineered secondary containment systems and confirmed storage capacities

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- product-specific details for storage vessels
- detailed spill response procedures, including spill kit specifications, locations and signage

However, as discussed and agreed with Seqwater on 15 June 2026, these matters will be addressed during detailed design and can be secured through development conditions.

Notwithstanding this, the proposed development will be designed, constructed and operated in accordance with relevant Australian Standards and industry best practice for the storage and handling of hazardous materials.