

NEXTDC

SC2 Data Centre

Hazardous Goods Report

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Executive Summary

This hazardous goods report has been prepared by Arup on behalf of NEXTDC Limited to accompany a Development Application (DA) for the data centre development at Lot 10, South Sea Islander Way, Maroochydoore, QLD, 4558.

The Queensland Government and Sunshine Coast Council require all developments to be assessed against various codes and regulations to ensure that the regulatory requirements are met regarding the use and storage of hazardous goods. As a result of the assessment on the SC2 data centre, this hazardous goods report concludes the following:

- Required actions:
 - As the manifest quantities of diesel and Class 2.2 gases in Schedule 11 of the Work Health and Safety Regulation (WHS) are exceeded, a manifest must be prepared and stored in the appropriate locations. Additionally, an emergency plan must be prepared.
 - As the placard quantities of diesel and Class 2.2 gases in Schedule 11 of the WHS are exceeded, the placarding requirements outlined in the WHS must be complied with.
 - Workplace Health and Safety Queensland (WHSQ) must be notified of the hazardous chemicals (diesel and Class 2.2 gases) that exceed the manifest quantities in Schedule 11 of the WHS.
 - Under the Environmental Protection Act 1994 (EP Act) the criteria for notification of chemical and petroleum product storage have been met and so notification is required as described in Division 2 of the EP Act.
 - The design shall comply with the relevant hazardous goods storage requirements per the attached compliance assessment workbook in Appendix A.1.
- No further actions required:
 - No hazardous goods thresholds have been exceeded for State Code 21.
 - The design complies with the PO5 requirements per the Sunshine Coast Planning Scheme.

1. Introduction

1.1 Purpose

Arup has produced the following hazardous goods report on behalf of NEXTDC Limited as a part of the DA submission for the SC2 data centre located at Lot 10, South Sea Islander Way, Maroochydore, QLD, 4558.

NEXTDC is an established and growing data centre developer and operator. Since its inception thirteen years ago, NEXTDC has developed multiple premium quality data centres nationally, all certified to the industry's highest standards. NEXTDC continues to grow their pipeline of world-class, next-generation data centres in Australian cities, with the latest expansion being the SC2 facility at Lot 10, South Sea Islander Way, Maroochydore QLD 4558 Australia, directly adjacent to the existing SC1 facility. The SC2 facility is to comprise a multi-level data centre with a total capacity of 6MW IT, as well as collaboration and mission critical (MCX) office space.

The development will house dangerous goods (i.e. lithium-ion batteries, diesel and gaseous cylinders) that must be assessed against the relevant codes, regulations, standards, and good practice recommendations to ensure the safety of on and offsite populations. The relevant documents used for this assessment are listed below:

- Planning Guideline State Code 21: Hazardous Chemical Facilities;
- Sunshine Coast Planning Scheme;
- Work Health and Safety Regulation 2011 (WHS Regs);
- Environmental Protection Act 1994 (EPA Act);
- AS 1940:2017 *The storage and handling of flammable and combustible liquids*;
- AS 4214:2018: *Gaseous fire-extinguishing systems*;
- AS 4681:2000 *The storage and handling of Class 9 (miscellaneous) dangerous goods and articles*;
- FM Global Data Sheet 5-32 – *Data Centres and Related Facilities*;
- FM Global Data Sheet 5-33 – *Lithium-Ion Battery Energy Storage Systems*; and
- NFPA 855-2023 – *Standard for the Installation of Stationary Energy Storage Systems*.

This report assesses the storage of:

- Diesel;
- Lithium-ion batteries; and
- Gaseous fire suppression cylinders.

The relevant recommendations and requirements are outlined in the sections below that will ensure the safe storage of dangerous goods within the facility.

1.2 Stakeholder Engagement

This report will be provided to all relevant stakeholders for review.

1.3 Assumptions & Limitations

The outcomes of this report are based on the following assumptions and limitations:

- That information, reports, drawings and specifications provided by others, upon which this assessment is based, are accepted as accurate.

- At this stage of the project there are a number of elements of the design that have not yet been finalised, as such this does not constitute a comprehensive compliance review and compliance will need to be determined as the design progresses.
- The relevant designers/ suppliers/ contractors are responsible for the compliance of their systems against the relevant clauses of the Standards and Guidelines.
- Arup recommends compliance to the relevant clauses of these standards and guidelines be verified prior to commencement of construction.

2. Hazardous Goods Storage

The relevant Australian Standards and international guidelines have been used to specify the storage requirements for the various types of dangerous goods stored on site.

The standards and guidelines referenced in this report are listed below and shall be consulted for the full requirements and clauses as required.

- AS 1940:2017 *The storage and handling of flammable and combustible liquids*;
- AS 4214:2018: *Gaseous fire-extinguishing systems*;
- AS 4681:2000 *The storage and handling of Class 9 (miscellaneous) dangerous goods and articles*;
- FM Global Data Sheet 5-32 – *Data Centres and Related Facilities*;
- FM Global Data Sheet 5-33 – *Lithium-Ion Battery Energy Storage Systems*; and
- NFPA 855-2023 – *Standard for the Installation of Stationary Energy Storage Systems*.

Note a detailed compliance assessment against the relevant Australian Standards and international guidelines for the hazardous goods to be stored at SC2 is attached in Appendix A.1 of this document.

2.1 Diesel Storage

2.1.1 Diesel Storage Tanks

The diesel storage for SC2 comprises 2 x 65kL above-ground tanks, each located on Lower Ground Level (the level with direct street access), in individual fire-rated rooms. The total available fuel for SC2 is estimated to be ~128kL across both tanks, including 6kL for gen day tanks at Roof Level. Figure 1 shows the location of these bulk storage tanks, highlighted in green.



Figure 1: Location of the diesel storage tanks highlighted in green (Source: SC2-ARC-ARC-DRG-A-0100-3000, Rev 21)

2.1.2 Backup Generators and Day Tanks

Backup generators (6 x 1kL) will be installed in internal packaged enclosures in the Level 4 services space. Figure 2 below shows this proposed arrangement.



Figure 2: Proposed generator locations on Level 4 highlighted green (Source: SC2-ARC-ARC-DRG-A-0100-3040, Rev 19)

While diesel is not classified as a dangerous good by the Australian Dangerous Goods Code (ADGC), it is a Class C1 combustible liquid. If there is a pre-existing fire, then diesel will be an additional source of fuel for that fire.

Mitigation of this potential loss of control is achieved by compliance with AS 1940:2017, which covers combustible liquids as well as flammable liquids (refer to Appendix A.1).

2.2 Lithium-Ion Batteries

Lithium-ion batteries are proposed to be installed in 6 designated battery rooms located on Level 4 of the development. Figure 3 below shows the proposed locations of the lithium-ion batteries highlighted green.



Figure 3: Proposed lithium-ion battery rooms highlighted in green (Source: SC2-ARC-ARC-DRG-A-0100-3040, Rev 19)

It is proposed that eight 800kg battery cabinets are to be installed within each battery storage room on-site, totalling 6,400kg per cabinet room and 38,400kg between all battery rooms. Lithium-ion batteries (LIBs) have the potential for thermal runaway and the following controls are considered sufficient to mitigate this risk so far as is reasonably practicable (SFAIRP). Each storeroom storing LIB units is to be provided with the following measures in addition to the relevant requirements documented in Appendix A.1:

- The rooms the batteries are stored within must have a FRL of 120/120/120;
- Adequate ventilation to relieve the off gassing of combustible gases from thermal runaway or a gas detection system;
- Adequate standoff distances of batteries from walls, floor, ceiling and other batteries (as defined by manufacturer);
- Smoke detection;

- Provision for complete flooding of individual battery cabinets and/or battery storage room in event of uncontrolled thermal runaway event;
- High pressure misting system; and
- The inclusion of lithium-ion batteries is to be incorporated into the overall fire safety strategy by the project fire engineer.

2.3 Cylinder Storage (Gaseous Fire Suppression System)

The gaseous fire suppression cylinder stores are proposed to be located on the ground level in the gas suppression plant rooms. A total of 24,000L of IG-541 (an inert gas mixture of 52% nitrogen, 40% argon and 8% carbon dioxide) gas cylinders are to be stored across the two rooms. The location of the stores can be seen in Figure 4.

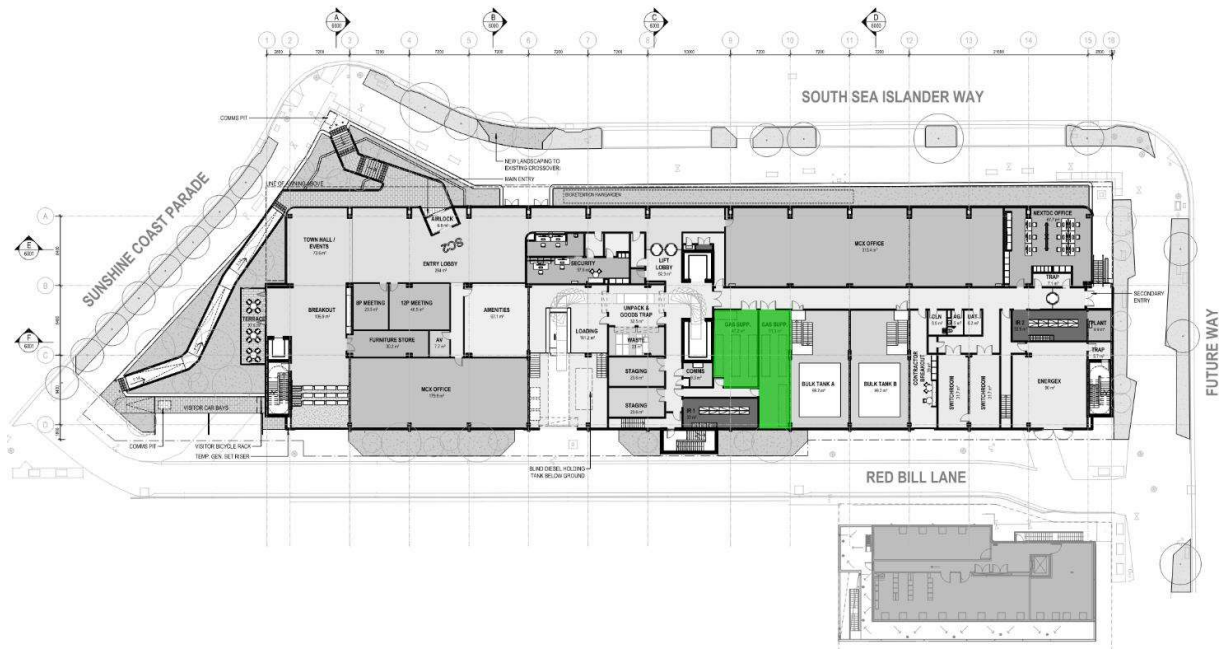


Figure 4: Gas suppression storerooms highlighted in green (Source: SC2-ARC-ARC-DRG-A-0100-3001, Rev 21)

AS 4332:2004 is the standard for the storage and handling of gases in cylinders. It should be noted that this standard is not applicable to cylinders that form part of a fire suppression system as proposed on the site. As such, the proposal will not be assessed against AS 4332:2004.

The gas suppression system is required to comply with AS 4214:2018: *Gaseous fire-extinguishing systems*. Clause 6.2.3 notes that: *where storage containers are located in areas where their leakage could lead to the development of a concentration greater than the NOAEL (no observed adverse effect level), a warning notice shall be provided to identify the potential hazard together with adequate ventilation to minimize the hazard*. Appendix N3 Table N8 provides the physiological information for IG-541. The NOAEL for IG-541 is 43% by volume which corresponds to 12% minimum oxygen for the no effect level.¹

To achieve compliance with this standard, the following measures are required to be implemented:

- Signage in accordance with AS 4214:2018, and
- Mechanical ventilation sufficient to maintain the IG-541 volume below the NOAEL in the event of a cylinder release.

It is recommended the following controls to be implemented in the cylinder stores to further reduce the risk associated with accidental discharge of a cylinder:

¹ These values are based on the physiological effects in human subjects in hypoxic atmospheres

- Locked entries with access restrictions;
- Cylinder leak detection equipment;
- Oxygen depletion alarms (audible and visual) be fitted in each cylinder store; and
- Interlocks on doors to prevent entry in the event of oxygen depletion alarm triggering.

2.4 Hazardous Goods Summary

Table 1 below summarises the total amounts of hazardous goods on site at SC2.

Table 1: Hazardous goods summary

Hazardous Good	Quantity
Diesel	~128,000 L (128 kL)
Lithium-ion Batteries	~38,400 kg
Gaseous Fire Suppression Cylinders (IG541)	24,000 L

3. Relevant State Planning Codes, Regulations and Legislation

The following section outlines SC2's compliance requirements with the various state and city codes, regulations and legislation.

3.1 Planning Guideline State Code 21

The Queensland Department of Infrastructure, Local Government and Planning (DILGP) requires all developments to be assessed through the State Assessment and Referral Agency (SARA). State Development Assessment Provisions (SDAP) provide an outline for applicants to demonstrate how the development conforms with applicable state codes. Hazardous chemical facilities need to be assessed against State Code 21: Hazardous Chemical Facilities².

A hazardous chemical facility is classified as a facility where a prescribed hazardous chemical is or is likely to be present in quantities exceeding 10 per cent of the threshold for major hazard facilities (MHF). Prescribed materials and quantities can be found in Schedule 15 of the WHS Regs. Lithium-ion batteries (Class 9 dangerous goods (DG)), diesel (C1 combustible liquid) and the gaseous fire suppression cylinders (Class 2.2 DG) are not prescribed hazardous chemicals under Schedule 15 of the WHS and therefore have no threshold.

As a result, the facility is not classified as a hazardous chemical facility under Queensland regulations, as such **does not require any further assessment against State Code 21.**

3.2 Sunshine Coast Planning Scheme

Developments that include the storage of hazardous materials, chemicals, dangerous goods and flammable/combustible substances must be assessed against performance outcome 5 (PO5) of the Sunshine Coast Planning Scheme 2014³, Part 9.3.9 Industry Uses Code (Development Codes).

Compliance with PO5 is required as the acceptable outcome (AO5) is not provided for this part of the code. PO5 outlines that a development that involves the use, storage and disposal of hazardous materials, hazardous chemicals, dangerous goods and flammable or combustible substances must demonstrate that the substances do not cause:

- a. a public health or safety hazard; or
- b. environmental harm or nuisance.

The following points are highlighted in the current proposed design of SC2 to demonstrate achievement of PO5:

- The design shall be compliant with all relevant Australian Standards, international guidelines and state/city planning codes and regulations regarding the storage of hazardous materials, chemicals, dangerous goods and flammable/combustible substances.
- The loading dock is to be equipped with a rollover bund to contain a spill/ leak during diesel loading operations at Fill Point A, preventing environmental harm to the surrounding waterways and environment.

² <https://www.worksafe.qld.gov.au/safety-and-prevention/hazards/hazardous-chemicals/Working-with-large-quantities-of-hazardous-chemicals/are-you-a-possible-major-hazard-facility>

³ <https://www.sunshinecoast.qld.gov.au/development/planning-documents/sunshine-coast-planning-scheme-2014/view-the-sunshine-coast-planning-scheme-2014-text/part-9-development-codes>

- The building design will adopt fire protection measures commensurate to the identified risk to mitigate the risk of fire spread in the event of a LIB battery fire in the battery rooms, as specified by the fire engineer.
- The storage room for the fire suppression cylinders shall be designed to mitigate negative impacts in the event of a leak or malfunction of the gaseous fire suppression cylinders.

3.3 Work Health and Safety Regulation

Part 7.1 of the WHS Regulation⁴ sets the requirements for the use, handling and storage of hazardous chemicals in a workplace. This report assesses the storage requirements for the dangerous goods stored on site and the requirements should the chemicals exceed the placard and manifest quantities within Division 3 and 4 of Part 7.1.

Regulation 328(4) sets out the exclusions from Part 7.1 for hazardous chemicals in certain circumstances. Regulation 328(4)(a) excludes “hazardous chemicals in batteries when incorporated in plant”. As such, the use of Li-ion batteries at the facility are excluded from the requirements of Part 7.1.

It should be noted that Regulation 328(4)(b) excludes “fuel, oils or coolants in a container fitted to a vehicle, vessel, aircraft, mobile plant, appliance or other device, if the fuel, oil or coolant is intended for use in the operation of the device”. This also excludes diesel stored in tanks with connecting pipework to the generators from the requirements of Part 7.1. However, due to the large total quantity of diesel present at the facility, it is considered good practice to follow the requirements of Part 7.1. Recommendations are therefore made for the storage of diesel as a C1 combustible liquid, equivalent to C4 flammable liquid, in line with Part 7.1 of the WHS Regulation.

The storage of IG-541 gas compressed in cylinders as part of the fire suppression system will be assessed as a Class 2.2 non-flammable and non-toxic gas.

The assessment against the WHS Regulation applies to the total quantity of hazardous chemicals on the site.

3.3.1 Manifest Quantities

Regulation 347 sets out the requirements for maintaining a manifest of hazardous chemicals if they exceed the specific manifest quantities. Regulation 348 sets out the requirements for the notification of the regulator if these are exceeded. Additionally, Regulation 361 requires an emergency plan to be prepared if quantities are exceeded.

Gases under pressure (cylinders) (not stated elsewhere in Schedule 11 of the WHS) have a manifest quantity of 10,000 L (10kL). A total of approximately 24,000 L (24kL) of gases under pressure is currently or proposed to be stored across the site, which **exceeds the manifest quantity**.

In addition to the gases under pressure, the manifest quantity for diesel (category 4 flammable liquid⁵) as per Schedule 11 of the WHS Regs is 100,000 L (100kL). There is ~128kL of diesel proposed to be stored on site, which **exceeds the manifest quantity**.

As result of these quantities, the following recommendations are made:

- A manifest of all Schedule 11 chemicals shall be prepared in accordance with Regulation 347 and Schedule 12 of the WHS Regs.
- WHSQ shall be notified of diesel and gases under pressure storage exceeding manifest quantities in accordance with Regulation 348 of the WHS Regs.
- An emergency plan shall be prepared for the Site and provided to the Queensland Fire and Emergency Services as per the requirements of Regulation 361 and Division 4 of Part 3.2 of the WHS Regs.

⁴ <https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2011-0240>

⁵ Note that the WHS refers to combustible liquids as flammable liquid category 4

3.3.2 Placard Quantities

Regulation 349 sets out the requirements for placards of hazardous chemical facilities if they exceed the specific quantities outlined by schedule 11 of the WHS Regs.

The total storage of gasses under pressure of 24,000L exceeds the placard quantity of 1000 L stated in Schedule 11 of the WHS Regs.

Additionally, the storage of ~128kL of diesel exceeds the placard quantity of 10,000 L (10kL) stated in Schedule 11 of the WHS Regs.

The following recommendations are made:

- Outer warning placards regarding quantities of diesel and gases under pressure stored shall be displayed at any entrance where emergency services may enter the workplace in accordance with Regulation 349 and Schedule 13 of the WHS Regs.
- Placards shall be displayed on or near the diesel and gases under pressure storage in accordance with Regulation 350 and Schedule 13 of the WHS Regs.

3.3.3 Managing Spills

Regulation 357 requires a person conducting a business or undertaking to ensure, so far as is reasonably practicable, that provision is made for a spill containment system where there is a risk of a leak or spill of a hazardous chemical. The WorkSafe Queensland *Managing risks of hazardous chemicals in the workplace* Code of Practice further details how spills should be managed⁶.

Fill Point A for the diesel tanks is located in the loading dock. A drive-over bund is to be provided at the loading dock to allow for the containment of a diesel spill during the tank filling procedure. Fill Point B is provided only as a redundancy in the event of an emergency situation whereby it is necessary to refill the diesel tanks and Fill Point A is inaccessible. In this way, adequate spill containment is provided.

3.4 Environmental Protection Act

The EP Act (1994)⁷ sets out the activities for which notification to the EPA is required. Table 2 below shows the criteria for relevant chemical storage to be declared a notifiable activity as per Schedule 3 of the EP Act and therefore requires compliance with Division 2 (Duty to notify of environmental harm) of the Act.

Table 2: Criteria for notifiable activity under the EP Act 1994, Schedule 3 Part 7 & 29

Activity	Criteria
Chemicals storage (other than petroleum products and gases under pressure)	Storage of greater than: 10 t
Petroleum products storage (flammable and combustible)	Above ground tank capacity greater than: 25 000 L (25kL) Underground tank capacity greater than: 200 L

Chemical storage is defined to include all chemical substances classified as dangerous goods by the ADGC.

The assessment against the EP Act considers the chemical storage on the SC2 site, comprising:

- Class 9 DGs; and
- Combustible petroleum products.

⁶ https://www.worksafe.qld.gov.au/__data/assets/pdf_file/0027/72639/managing-risks-of-hazardous-chemicals-cop-2021.pdf

⁷ <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1994-062>

Lithium-ion batteries are classified as Class 9 DG by the ADGC; therefore, notification is required if more than 10t (chemical storage) of lithium-ion batteries are stored onsite. Additionally, diesel is classified as a C1 combustible liquid by the ADGC; therefore, notification is required if the material is stored in above ground tanks with a capacity of greater than 25,000 L (25kL) (petroleum product storage).

The SC2 storage quantities are shown in Table 3.

Table 3: Chemical storage assessment (EP Act)

Chemical	Quantity	Notification Required?
Chemicals storage		
Class 9 (Lithium-ion batteries)	38.4t	Yes
Petroleum products storage		
C1 (diesel)	~128kL	Yes

As the criteria for general chemicals storage and petroleum products storage that are declared to be a notifiable activity under the EP Act 1994 have been met, **notification is required for the storage of lithium-ion batteries and diesel.**

4. Findings and Requirements

4.1 Planning Guideline State Code 21

None of the prescribed hazardous chemicals stored on-site exceed 10 per cent of the threshold for a MHF as outlined in Schedule 15 WHS Regs 2011.

The facility is not classified as a hazardous chemical facility under Queensland regulations, and as such does not require any further assessment against State Code 21.

4.2 Sunshine Coast Planning Scheme

SC2 is compliant with PO5 per the Sunshine Coast Planning Scheme as detailed in Section 3.2 and does not require any further assessment against the scheme.

4.3 Work Health and Safety Regulation

The legislative requirements of the WHS Regs have been assessed.

- The manifest quantity thresholds for diesel and gases stored under pressure as set out by Schedule 11 of the WHS Regs are exceeded. A manifest of all Schedule 11 chemicals must be prepared.
- The placard quantity thresholds for diesel and gases under pressure as set out by Schedule 11 of the WHS Regs are exceeded. Placards in accordance with Schedule 13 of the WHS Regs will be required to be displayed.

4.4 Environmental Protection Act

The criteria for notification of chemical and petroleum product storage under the EP Act 1994 have been met and so notification is required as described in Division 2 of the EP Act.

4.5 Other Findings

Recommendations have been provided to mitigate the risks associated with the gaseous fire suppression stores (Section 2.3).

4.6 Key Requirements

Per the analysis above, the following is required for the hazardous stores at SC2:

- The hazardous goods stored on site shall comply with the relevant requirements per the compliance check document in Appendix A.1.
- A manifest of all Schedule 11 chemicals shall be prepared in accordance with Regulation 347 and Schedule 12 of the WHS.
- WHSQ shall be notified of diesel and gases under pressure storage exceeding manifest quantities in accordance with Regulation 348 of the WHS.
- An emergency plan shall be prepared for the Site and provided to the Queensland Fire and Emergency Services as per the requirements of Regulation 361 and Division 4 of Part 3.2 of the WHS Regs.
- Outer warning placards regarding quantities of diesel and gases under pressure stored shall be displayed at any entrance where emergency services may enter the workplace in accordance with Regulation 349 and Schedule 13 of the WHS Regs.
- Placards shall be displayed on or near the diesel and gases under pressure storage in accordance with Regulation 350 and Schedule 13 of the WHS Regs.

- Under the Environmental Protection Act 1994 (EP Act) the criteria for notification of chemical and petroleum product storage have been met and so notification is required as described in Division 2 of the EP Act.

References

- FM Global, Property Loss Prevention Data Sheet 5-32 - Data Centres and Related Facilities (2024).
- FM Global, Property Loss Prevention Data Sheet 5-33 - Electrical Energy Storage Systems (2024).
- NFPA 855-2023 – *Standard for the Installation of Stationary Energy Storage Systems* (2023).
- Queensland Government, Queensland Environmental Protection Act (1994).
- Queensland Government, State Code 21: Hazardous Chemical Facilities (2022).
- Queensland Government, Queensland Work Health and Safety Regulation (2011).
- Standards Australia, AS 1940-2017: The storage and handling of flammable and combustible liquids (2017).
- Standards Australia, AS 4214-2018: Gaseous fire extinguishing systems (2018).
- Standards Australia, AS/NZS 4681-2000: Storage and handling of Class 9 (miscellaneous) dangerous goods and articles (2000).
- Sunshine Coast Council, Sunshine Coast Planning Scheme (2014).

Appendix A

Compliance Check

A.1 Relevant Australian Standards and International Guidelines Compliance Check