FIRE RISK ANALYSIS OF THE WORKED-OUT AREAS OF MORWELL OPEN CUT

JUNE 1992

Richard Oliver International Pty Ltd (ACN 006 256 908)

71 Queens Road, Melbourne Vic. 3004

Telephone: (03) 529 5122 Facsimile: (03) 521 1634

TABLE OF CONTENTS

- Wit	ITI	EM		PAGE NO.
	EX	ECUTI	VE SUMMARY	i
	1.	INT	RODUCTION	1
The state of the s		1.1 1.2 1.3	Purpose of this Project Scope and Assumptions Background and Context	1
	2.	MET	THODOLOGY	2
		2.1 2.2 2.3	Definition of Risk and Risk Analysis Key Risk Issues Data Collection and Analysis	2 2 3
.*	3.	- FINI	DINGS	: 3
		3.1 3.2	Current Status of the Worked-Out Areas and Batters Current Status of the Fire Protection Available to the	3
			Worked-Out Areas	5
		3.3	Fire History and the Likelihood of Fires	5 7
		3.4 3.5	Exposures and Vulnerabilities Potential Consequences of Severity	8
		3.5 3.6	Potential Consequences of Severity Mandatory Requirements and Legal Liability	9
		3.7	SECV Insurances	· 10
	4.	CON	CLUSIONS	10
		4.1	Risk of Fire in the Worked-Out Areas and Batters	10
`		4.2	Legal Liability	10
ر ن		4.3	Policy Exemption	10
		4.4	Improvement to Fire Protection	11
	5.	REC	OMMENDATIONS	11
		5.1	Fire Protection Systems	11
		5.2	Fire Prevention	12
		5.3	Policy Revision	13
		REFE	ERENCES	
		FIGU	RES	
		TABL	LES	

APPENDICES

· AND A

EXECUTIVE SUMMARY

1. <u>INTRODUCTION</u>

1.1 PURPOSE OF THIS PROJECT

This project aims to assess the fire risk of the worked-out areas of the Morwell Open Cut ("MOC") and ascertain whether an exemption from the Latrobe Valley Open Cuts Fire Protection Policy 1984 (hereinafter "LVOCFPP"), and specifically its sections 1.1.4 and 1.1.5, would be appropriate and justifiable.

1.2 SCOPE AND ASSUMPTIONS

1.2.1 Definition of the worked-out areas

The worked-out areas and batters considered in this study cover the mine area extending eastwards from No. 4 groyne and including the north-eastern and eastern batters.

1.2.2 Assumptions

Unless stated otherwise, it has been assumed in this study that the fire protection policy for the open cuts ("LVOCFPP") is appropriate and reasonable and that presently all fire protection systems at M.O.C. comply with the requirements of this policy.

1.3 BACKGROUND AND CONTEXT

With finite resources to be allocated to fire protection of the whole open cut, M.O.C. considers it best to direct these resources to protection of personnel and assets in operating areas of the cut on the basis that these represent a greater fire risk than the worked-out areas of the mine.

The fire risk of worked-out areas may perhaps be better mitigated by restricting access to worked-out areas and removing power poles from here, maintaining several charged water lines, and by upgrading fire protection systems for the cut as a whole (e.g. more tanker filling points).

2. CONCLUSIONS

· titeat.

2.1 Risk of Fire in the Worked-out Areas and Batters

The risk of fire in the worked-out areas is not minimal, because:

- there are about 20 fires a year in these areas.
- on average, their severity is similar to those fires in working areas of the mine in terms of usual extinction effort.
- these fires are located near key vulnerabilities, mostly in the dirty coal dump near the 260 series conveyors and around the production area in the North-East corner of the pit where a critical bore pump (M 2055) is placed.

2.2 Legal Liability

The CFA Act overshadows LVOCFPP, imposing a stringent requirement upon M.O.C. to adhere to practicable fire prevention and control measures. LVOCFPP is practicable.

Issues of cost and cost-benefit are not relevant to M.O.C.'s considerations of its fire protection responsibilities. Practicability is.

2.3 Policy Exemption

Exemption from sections 1.1.4 and 1.1.5 would increase fire risk in the worked-out areas and would increase SECV, and M.O.C., liability in this regard. Presently this risk is not minimal. An exemption is thus not appropriate.

Moreover, any such policy exemption or modification should not proceed until there has been a demonstrable reduction in fire risk.

2.4 Improvement to Fire Protection

Our inspections and calculations indicate the present fire water service system is quite adequate for the worked-out areas, in accordance with the policy.

M.O.C. are correct in directing their thinking towards restricting vehicle access to worked-out areas, removing assets, increasing the number of tanker filling points and so on. These strategies do focus on the fire exposures of the worked-out areas.

This suggests implementation of these preventative and control measures, reinforced where necessary by addition or modification to LVOCFPP accordingly, is the appropriate strategy.

Policy development can thus proceed following evidence of reduction in risk.

3. <u>RECOMMENDATIONS</u>

. . .

3.1 Fire Protection Systems

We would suggest the following recommendations based on this study:

- i. Undertake a detailed engineering survey of the fire water system, and include assessment of the North-East corner coal production area in this. This survey should cover maintenance, design and pump performance aspects of the fire water system.
- ii. Update the reticulation drawing and its hydraulic analysis, and ensure all appropriate personnel as necessary (eg. Fire Services) are advised of updates.
- iii. Use both old clean water tanks for fire water storage and fit a tanker filling point to these (refer Figure 14). This will make a substantial quantity of water readily available for fire suppression in the worked-out areas.

3.2 Fire Prevention

- i. Keep all M.O.C. fire reports on a P.C. data base and regularly review this data for causes and trends. This data analysis will assist to systematically reduce fire risks.
- ii. Examine restrictions to roadways in the worked-out areas. For example, a permit system could be adopted to control access to specified roads and incorporate a check or control upon vehicle exhaust systems, at the same time.
- iii. Stop dumping of dirty coal adjacent to the 260 series conveyors. Look to relocate such dumping.
- iv. Relocate power feeders 15 and 16. We understand a relocation to near the 260 series conveyors is already proposed.
- v. Commence a pole replacement programme for the 4, 5 and 16 power feeders, replacing timber poles with concrete ones.

3.3 Policy Revision

Suggested revisions to LVOCFPP would be:

- (i) Specify number, distance, capacity requirements for Tanker Filling Points.
- (ii) Automatic monitoring for fire pumps and other critical fire protection equipment, for example, by having a light and hooter alarm at the pump station to indicate loss of water pressure. This alarm would be visible from the fire detection points like Fire Service office and Production Control.

FIRE RISK ANALYSIS OF THE WORKED-OUT AREAS AND BATTERS IN MORWELL OPEN CUT

1. <u>INTRODUCTION</u>

- K

شاعوم مه

1.1 PURPOSE OF THIS PROJECT

This project aims to assess the fire risk of the worked-out areas of the Morwell Open Cut ("MOC") and ascertain whether an exemption from the Latrobe Valley Open Cuts Fire Protection Policy 1984 (hereinafter "LVOCFPP"), and specifically its sections 1.1.4 and 1.1.5, would be appropriate and justifiable.

1.2 SCOPE AND ASSUMPTIONS

1.2.1 Definition of the worked-out areas

The worked-out areas and batters considered in this study cover the mine area extending eastwards from No. 4 groyne and including the north-eastern and eastern batters. These areas are shown pictorially in figures 1 to 6 inclusive.

The southern batters and the "200 series" conveyors, the power lines and feeders adjacent these on 7 level, the "20 series" conveyors along the eastern batters, and grass level outside the pit are excluded from the scope of this study. Note however that any detrimental impact on these assets that could result from fire spreading from the worked-out areas is considered.

1.2.2 Assumptions

Section 1.1.4 and 1.1.5 of LVOFCPP are reprinted opposite for ready reference.

Unless stated otherwise, it has been assumed in this study that the fire protection policy for the open cuts ("LVOCFPP") is appropriate and reasonable and that presently all fire protection systems at M.O.C. comply with the requirements of this policy.

1.3 BACKGROUND AND CONTEXT

Morwell Open Cut considers that the worked-out areas of the pit may represent a low fire risk. With finite resources to be allocated to fire protection of the whole open cut, it appears best to direct these to protection of personnel and assets in operating areas of the cut on the basis that these represent greater fire risk.

The fire risk of worked-out areas may perhaps be better mitigated by restricting access to worked-out areas and removing power poles from here, maintaining several charged water lines, and by upgrading fire protection systems for the cut as a whole (e.g. more tanker filling points).

2. METHODOLOGY

Our methodology is outlined below. It should be noted that this risk analysis provides an initial appraisal only, given the timeframe for work of 19 days. Where further work would be warranted, this has been indicated.

2.1 DEFINITION OF RISK AND RISK ANALYSIS

Three elements making up the fire risk are considered, as follows:

- the likelihood of fire occurrence in worked-out areas.
- the exposure of SECV assets such as personnel, plant and equipment within the mine as well as outside its boundaries to fire or its immediate consequences, either
 - a) within the worked-out areas, or
 - b) as a result of fire spreading from or through these areas.
- the consequences of any fire in worked-out areas for
 - property/asset loss
 - personnel safety
 - liabilities to SECV or its officers
 - interruption to SECV operations
 - corporate image
 - other community impact outside the mine.

The severity of potential consequences is appraised in terms of both normal loss expectancy and maximum foreseeable loss.

2.2 KEY RISK ISSUES

In summary, the following are included in consideration:

- the mandatory requirements upon M.O.C. for fire protection and suppression.
- the history of fires at M.O.C. and their consequences, and what implications they may have for the current M.O.C. fire risk.

- the current status of the worked-out areas, the nature, size and location of any specific fuels or fire hazards, like exposed coal.
- the susceptibility of key assets like conveyors and pumps to fire in or from worked-out areas.
- the current status of fire protection in these areas in terms of
 - fire prevention
 - fire detection
 - fire suppression, both for extinguishment and for restricting potential spread of fire.

2.3 DATA COLLECTION AND ANALYSIS

2.3.1 Data Collection

Data collection was based largely on review of available documentation and engineering drawings (see reference), site inspections and discussions with a number of SECV personnel. These personnel are listed in Appendix 1.

2.3.2 Data Analysis

A qualitative assessment has been made of overall fire risk and the appropriateness of policy exemption.

Quantitative evaluation has been made of -

- fire reports, obtained for the period November 1989 to April 1992.
- hydraulic performance of the fire water drenching system as applicable to the worked-out areas.
- potential frequency and severity predictions of M.O.C. fire, using a Pareto simulation technique.

3. FINDINGS

No. 16.

3.1 CURRENT STATUS OF THE WORKED-OUT AREAS AND BATTERS

The current status of these areas is illustrated pictorially in figures 3-13 inclusive. In particular, it was noted:

(i) there are critical assets in the worked-out areas, notably -

- 6.6 kV power feeder lines to bore pumps, clean water pumping station, fire pumps and the 20 series conveyors. These are generally on timber poles.
- critical artesian bores, especially

for M1 aquifer

44. A

M 2055 and M 3455

for M2 aquifer

M 3284, M 2443, M 3079,

M 2979 and M 2196

- (ii) there are critical assets (key vulnerabilities) adjacent the workedout areas, notably the 260 series production-coal conveyors and the 20 series conveyors to MPS and briquette plant.
- (iii) there is exposed coal. From site visits and after review of an aerial photograph (scale 1:2500 approx) there appear to be several sections of the worked-out area where clay covering has not yet been applied.

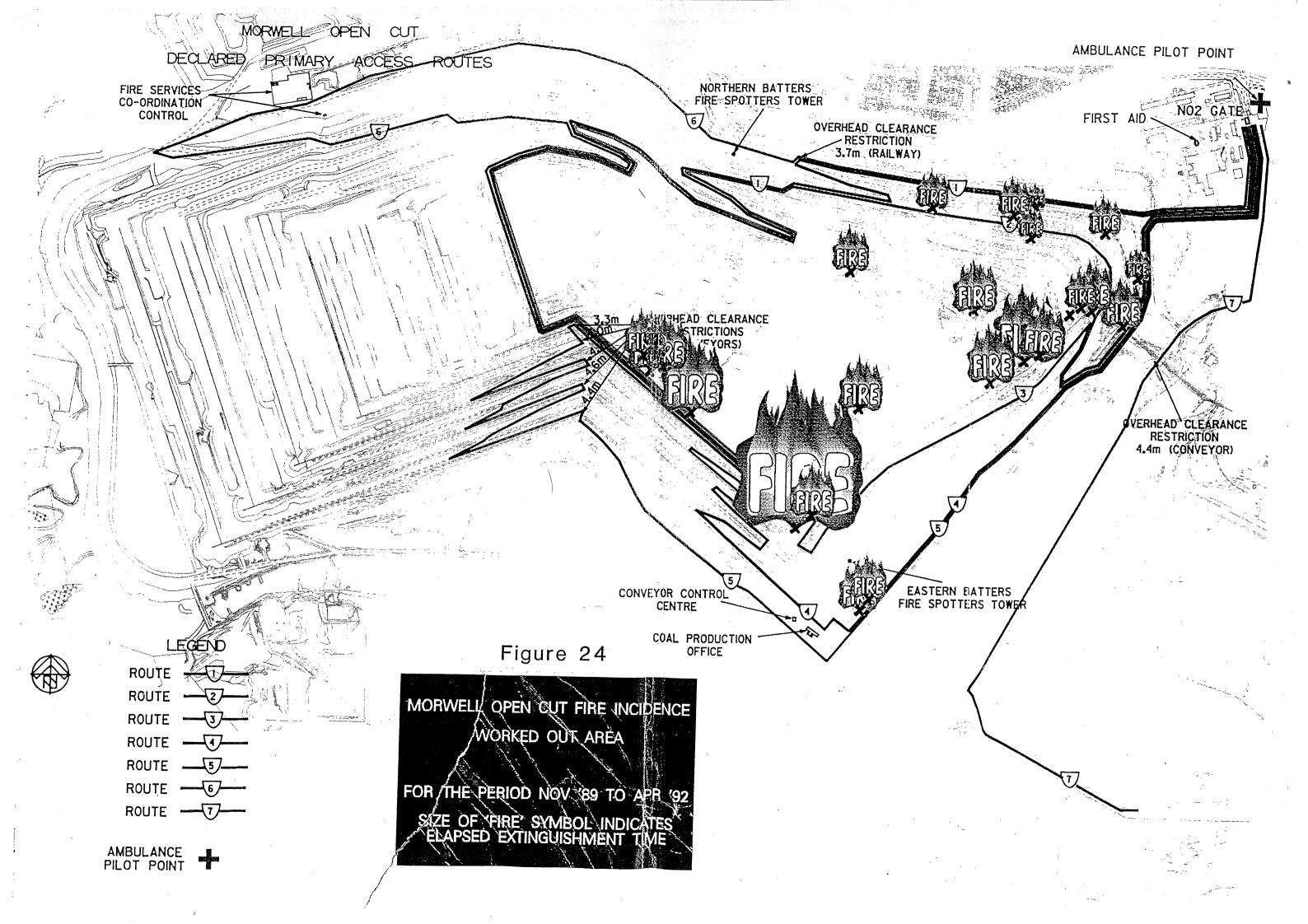
Our estimates of area are:

400m	X	200	=	80,000
250m	X	200	=	50,000
200m	X	375	=	84,375
250m	X	250	=	62,500
200m	X	300	=	60,000

TOTAL <u>336,875m²</u>

or around 8% of the total plan area of the worked-out areas.

- (iv) there are specific activities which could represent a fire hazard, notably -
 - traffic of vehicles without protected exhausts.
 - a coal production operation (refer figure 3), providing coal quantities equivalent to MPS requirements. Note that risk appraisal of this operation was considered as outside the terms of reference for this study.
 - a dirty coal dump near the southern pivot (refer figure 4).



(v) the predominant winds are directed from the south-west and west across the mine towards the key vulnerabilities on the southern and eastern batters. Appendix 2 summarises wind details.

3.2 CURRENT STATUS OF THE FIRE PROTECTION AVAILABLE TO THE WORKED-OUT AREAS

Similarly, figures 15-20 inclusive generally indicate the present nature and scope of the fire protection, and the fire water service system in particular.

A detailed appraisal of this system's state of readiness was not made, this being outside our terms of reference.

The performance of the fire water service for the worked-out area was assessed however in terms of the policy, and details are given in Appendix 3. In summary, our findings are that the water supply to the worked-out areas appears satisfactory at present. In fact, our limited calculations suggest water supply could be, a little greater (perhaps 20% more) than policy requirement for the worked-out areas and batters. This water requirement is for the exposed coal (see 3.1 iii previous).

Table 2 opposite summarises our understanding of the fire/water tanker resources available to M.O.C. for fire control.

3.3 FIRE HISTORY AND THE LIKELIHOOD OF FIRES

3.3.1 General Overview

The broad history of fires in the Latrobe Valley and at the open cuts in particular, places SECV, and thus M.O.C., in a position of high public and political profile where fire is concerned. This context must be considered a risk factor. We have briefly summarised the outcomes of the 1944 Yallourn and 1977 M.O.C. fires and compared these with M.O.C. fire protection status as at present. This summary is given in Table 1 and "profiles" current risk in these historical/political terms. It would appear that the potential effectiveness of current fire countermeasures is somewhat greater than in 1977, based on improved communications and coordination (Displan), fire fighting technology and techniques.

Other implications from our table would appear self-evident.

3.3.2 Fire History of the M.O.C. Worked-out Areas

The results of analysis of all M.O.C. fire reports for the period 11/89 to 4/92 inclusive are illustrated in figures 21 and 22 (opposite page) and figure 23 overleaf.

Summarising these results:

- (i) there have been 28 fires reported in the worked-out areas in this period. This suggests occurrence of around 11 fires per year.
- (ii) primary causes are motor vehicles and burning/welding.
 "Unknown" causes could include bushfire spotting,
 lightning, electrical causes like conductor clashing on
 power feeders, falling power poles, etc. These have
 occurred in the worked-out areas.
- (iii) loose coal was primarily the material burnt.
- (iv) piped water was the major means of fire suppression.
- (v) in terms of manhours and equipment hours reported for extinguishment, the fires in the worked-out areas are of similar severity on average to those occurring in the working areas of the mine.
- (vi) the fires are most frequently located in the dirty coal dump and the coal production operation in the North East corner of the pit. Figure 24 overleaf shows locations of all fires and also indicates their relative severity.

Appendix 4 provides a summary of the fires in the worked-out areas.

3.3.3 Fire Trends

Data analysis shows -

- (i) the number of fires per year increased through 1984 1989. Fires in 1990/91 were substantially fewer than for 87/88 and 88/89, though this may be an artefact of reporting.
- (ii) as could be expected, fires are most numerous in summer (January).

Figures 25 and 26 also overleaf illustrate these trends.

Morwell Open Cut Fire Report

Method Used for Fires in the Worked Out Area

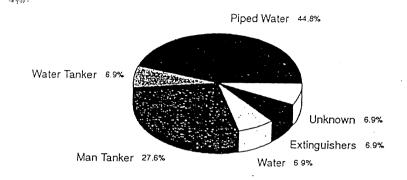
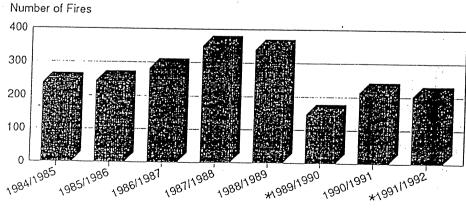


Figure 23

Morwell Open Cut Fire Report

Number of Fire Incidents



Financial Year

*Incomplete years

3.4 EXPOSURES AND VULNERABILITIES

3.4.1 Personnel Safety

This would appear a minimal risk. We understand fires at M.O.C. have not caused loss of life previously. This would not be anticipated from fire in worked-out areas.

3.4.2 Loss of Assets and Business Interruptions

As previously indicated, conveyors are vulnerable to spread of fire from the worked-out areas.

Loss of power to pumping stations or 20 series conveyor, through damage to feeders 4, 5, 15 and 16, is an evident exposure as are electrical cubicles, transformers and associated power supply cables linked to bores located in the worked-out areas.

Fire could possibly progress along the northern batters into operating levels or more likely be blown into working areas, but this would seem less likely than the abovementioned risk exposures.

3.4.3 Spread of Fire

3.4.3.1 From or Through the Worked-Out Areas

With all but about 8% of the plan area of the worked out areas and batters covered by water or clay, significant general spread of fire through the worked-out areas does not appear to be a key threat.

Rather, spread of fire may be:

- i quite localised. Thus, fire immediately adjacent the conveyors, at or near pump or pole locations is relatively the greatest exposure.
- ii through the worked-out batters. The policy addresses this.
- iii from embers of coal or foliage fires blown by the wind.
- iv from mechanical means like vehicle traffic or other work activity.

3.4.3.2 Vulnerabilities Outside the Pit

Again, the risk here is for fire to potentially spread to grass level from its initiation within the workedout areas of the pit.

However there is substantial combustible foliage within the worked-out area and this could possibly "spot" a grass level fire. Relative to 3.4.2 above, risk of this seems less as we are led to believe fire progress from within to outside the pit has never occurred.

3.5 POTENTIAL CONSEQUENCES OF SEVERITY

3.5.1 Normal Loss Expectancy

TE T

() ·

From the results of analysis of fire reports available to this study, normal loss expectancy from fire in the worked-out areas would appear to be of order:

• average 2 manhours, 1 equipment hour per fire; maximum 18 manhours, 5 equipment hours per fire.

These averages are similar to those for fires in the operating areas of the mine. However, for perspective, maxima reported there are 154 and 23 "hours" respectively.

• no reported asset \$ loss. No reports of actual cost were found in our analysis.

On average, fire report data indicates total duration (elapsed time) of <u>all</u> fires at M.O.C. could be expected to be around 75 hours per year. This duration represents the time from initial attendance at the fire through to its extinction.

Some 255 fires per annum can also be expected on average.

3.5.2 Maximum Foreseeable Loss

An initial simulation from the available data for the whole mine suggests there is -

• about a 1% chance of fire severity around 3 times greater than usually experienced in recent years (1989-1992).

• a less than 0.5% chance of fire severity around 5 times greater than usual.

Furthermore, this chance represents the likelihood of at least one such fire per year. That is, there is a feasible possibility of a fire of major severity occurring each year.

Figure 27 opposite illustrates this simulation. Note however that the simulation should be regarded as preliminary.

Such a simulation for the much smaller fire data of the workedout areas would be therefore meaningless. For the worked-out areas, our simulation at this stage simply then suggests it is important to maintain the LVOFCPP as an effective protection policy in light of possible, not necessarily probable, severity of loss from any fire initiated in and spreading from the worked-out areas or through the batters.

Should power supply be lost to critical bore pumps (e.g. M 2055 say) located in the worked-out areas as a result of fire, then SECV research suggests the theoretical possibility of heave of the mine floor after about 3 days of loss of mine dewatering. Discussion with mine hydrogeology indicated this possibility has however been contradicted in practice.

3.6 MANDATORY REQUIREMENTS AND LEGAL LIABILITY

The SECV is bound by Section 43(1)(a) of the Country Fire Authority Act to "prevent the occurrence of fires on and to minimise the danger of the spread of fires on or from any land vested in it or under its control or management".

The legal implications of any change - exemption and/or modification - to LVOCFPP sections 1.1.4 and 1.1.5 are appraised in detail in Appendix 5. In summary, key findings for M.O.C. are:

- (i) the statutory requirement (CFA Act) is more strict than a duty of care, and thus own policy like LVOFCPP.
- (ii) M.O.C. must take all practicable steps to prevent and suppress its fires. Because what it <u>has</u> been doing in applying LVOFCPP is practicable by definition, any change in that policy to reduce stringency of precautions would increase SECV liability. That is, the proposed exemption would increase liability (risk).

Therefore, any policy modification should aim to enhance prevention and/or suppression unless SECV (and M.O.C.) is willing to accept increased risk/liability.

(iii) questions of cost (and thus cost-benefit) are not relevant.

3.7 SECV INSURANCES

It is understood that any implications of possible exemption from LVOCFPP in this case are to be determined by SECV Risk Management and Claims Division, for example, by way of their review of the results of this report.

We would therefore simply note, further to 3.6 above, that any policy change that would be likely to increase the material risk to SECV insurers would need to be advised to those insurers for their deliberations otherwise the possibility could arise that they may void their present responsibility in event of any insured loss.

4. **CONCLUSIONS**

 $(\overline{}, \underline{})$

4.1 Risk of Fire in the Worked-out Areas and Batters

The risk of fire in the worked-out areas is not minimal, because:

- there are about 11 fires a year in these areas.
- on average, their severity is similar to those fires in working areas of the mine in terms of usual extinction effort.
- these fires are located near key vulnerabilities, mostly in the dirty coal dump near the 260 series conveyors and around the production area in the North-East corner of the pit where a critical bore pump (M 2055) is placed.

4.2 Legal Liability

The CFA Act overshadows LVOCFPP, imposing a stringent requirement upon M.O.C. to adhere to practicable fire prevention and control measures. LVOCFPP is practicable.

Issues of cost and cost-benefit are not relevant to M.O.C. considerations of its fire protection responsibilities. Practicability is.

4.3 Policy Exemption

Exemption from sections 1.1.4 and 1.1.5 would increase fire risk in the worked-out areas and would increase SECV, and M.O.C., liability in this regard. Presently this risk is not minimal. Thus an exemption would not appear to be justifiable nor appropriate.

Moreover, any such policy exemption, or any policy modification intended to ease fire control requirements, should not be adopted until there is evidence of a reduction in fire risk having been achieved. Such a reduction could be shown, for example, by a consistent and measurable decrease in the number and severity of fires reported in the worked-out areas.

4.4 Improvement to Fire Protection

Our inspections and calculations indicate the present fire water service system is quite adequate for the worked-out areas, in accordance with the policy.

M.O.C. are correct in directing their thinking towards restricting vehicle access to worked-out areas, removing assets, increasing the number of tanker filling points and so on. These strategies do focus on the fire exposures of the worked-out areas.

This suggests implementation of these preventative and control measures, reinforced where necessary by addition or modification to LVOCFPP accordingly, is the appropriate strategy.

Policy development can thus proceed following a demonstrable reduction in risk.

5. **RECOMMENDATIONS**

5.1 Fire Protection Systems

We would suggest the following recommendations based on this study:

i. Undertake a detailed engineering survey of the fire water system, and include assessment of the North-East corner coal production area in this.

This survey should consider at least the following:

- the design of anchorage points and thrust blocks.
- loadings on pipes due to ground shift or slippage.
- leakage rates and roughness coefficients to enable more accurate hydraulic calculations.
- the number and location of values to ensure these are sufficient to allow for such contingencies as loss of a critical pipe or main.

• ultrasonic testing of pipe wall thickness at a sample of points (say 50 in number) throughout the system to determine the extent, if any, of rusting of pipes especially at critical locations.

This survey will then enable any maintenance and design improvements to the fire water system to be methodically costed and scheduled.

- ii. Update the reticulation drawing and its hydraulic analysis, as a result of this engineering survey. Ensure such updates to the fire water system are advised to all appropriate personnel (e.g. Fire Services Team).
- Use both old clean water tanks for fire water storage and fit a tanker filling point to these (refer Figure 14). This will make a substantial quantity of water readily available for fire suppression in the worked-out areas.

5.2 Fire Prevention

- i. Keep all M.O.C. fire reports on a P.C. data base and regularly review this data for causes and trends. This data analysis will assist to systematically reduce fire risks. Note that we have provided the 1989-1992 data on diskette with this report.
- ii. Examine restrictions to roadways in the worked-out areas. For example, a permit system could be adopted to control access to specified roads and incorporate a check or control upon vehicle exhaust systems, at the same time.
- iii. Stop dumping of dirty coal adjacent to the 260 series conveyors. Look to relocate such dumping.
- iv. Relocate power feeders 15 and 16. We understand a relocation to near the 260 series conveyors is already proposed.
- v. Commence a pole replacement programme for the 4, 5 and 16 power feeders, replacing timber poles with concrete ones.

5.3 Policy Revision

Suggested revisions to LVOCFPP would be:

- (i) Specify number, distance, capacity requirements for Tanker Filling Points.
- (ii) Automatic monitoring for fire pumps and other critical fire protection equipment, for example, by having a light and hooter alarm at the pump station to indicate loss of water pressure. This alarm would be visible from the fire detection points like Fire Services office, fire towers and Production Control centre.

REFERENCES

1. ENGINEERING DRAWINGS

- 1. Morwell open cut division 6.6 kV distribution feeders single line diagram (reference 43/102/007 DRG1-AR), 20 November 1991.
- 2. Morwell Open Cut Fire and Water Service.

- a. General Layout as at 8 August 1990 (DRG No. MS 12-2-1/5/3z).
- b. General Layout as at October 1991 (DRG No. 12-2-1/11c).
- c. Fire Service orientation plan as at November 1991 (DRG No. LV61/1-3/044M).

2. SECV REPORTS AND MEMORANDA

- 1. Third International Mine Water Congress Excursion E2, Latrobe Valley Victoria
 Aquifer Dewatering Operations at Morwell Open Cut pp. 1-20, G. Sherlock 1988.
 - Morwell Open Cut North Eastern Batters Road Closures and Fire Service Pipe Removal.
 R. Supplitt (part of a value management study) 1991, 8pp.
 - 3. Golder Associates Pty Ltd, Review of Aquifer Dewatering at Morwell Open Cut 6, July 1990.

 Report to State Electricity Commission of Victoria (report no. 90612241).
 - 4. Memorandum 27 March 1992, Review of 1991/2 Summer Bushfire Mitigation Performance for 1991/2 (from General Manager Production) 6 pp.
 - 5. Morwell Open Cut Fire Protection Report by Investigating Committee, June 1964. (at 15 December 1964), 8 pp.
 - 6. Issues Paper Protection of SECV Latrobe Valley Assets from Rural Wildfire. R. Incoll (updated post 1984) 54 pp.
 - 7. SECV Production Group. Bushfire Mitigation Action Plan 1991/2 28 pp.
 - 8. SECV Liability Insurance Underwriting Submissions for 1989/90 and 1991/2.

- 9. Delaney WA. Morwell Open Cut Fire Risk Analysis. Research and Development Department Report, 30 November 1990. 33 pp.
- 10. Morwell Open Cut Fire 4-6 November 1977.

 Summary report by Review Committee, 30 June 1978. 19 pp plus appendices.

3. OTHER REPORTS

- 1. L.E.B. Stretton. Report of the Royal Commission to inquire into Yallourn Fires of 14 February 1944. 13 pp.
- -2. Von Rothkirch, B. Water Supply system for Fire Control at Garzweiler Open-Cut Mine. in Braunkohle, 1986, 38(9), pp. 268-273.

4. POLICY REPORTS

- Latrobe Valley Open Cuts Fire Protection Policy (revised) November 1984.
 plus review of section 1.4.3 Timbered Area, December 1990.
- 2. Policy for the Protection of SECV Latrobe Valley Assets from Rural Fires, July 1986, 8 pp. plus attachments.
- 3. Draft Policy, October 1985 for Protection of SECV Latrobe Valley Assets from the Rural Fire Threat. Includes Fire Issues paper.

5. GENERAL

1. Hall, J.R. and Sekizawa, A. Fire Risk Analysis-General Conceptual Framework for Describing Models. Fire Technology, February 1991, pp 33 - 53.

CT\SECV\MORREF:mg

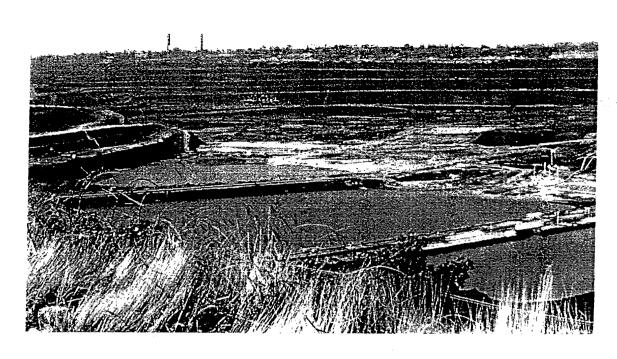


FIGURE 1: General view of the worked-out area of Morwell Open Cut (M.O.C.), looking at the eastern batters over No. 5 groyne in the foreground.



FIGURE 2: General view of the right hand portion of the worked-out area, looking east along the southern batters and the "260 series" conveyors. No. 5 groyne and the start of the present working area of the mine are in the lower half of the picture.



FIGURE 3: Coal winning operation using mobile plant and haul trucks located in north-east corner of the worked-out area.

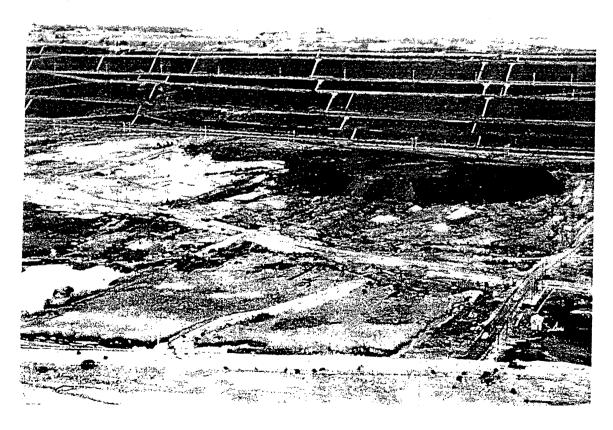


FIGURE 4: Dirty coal dump in worked-out area (looking south).

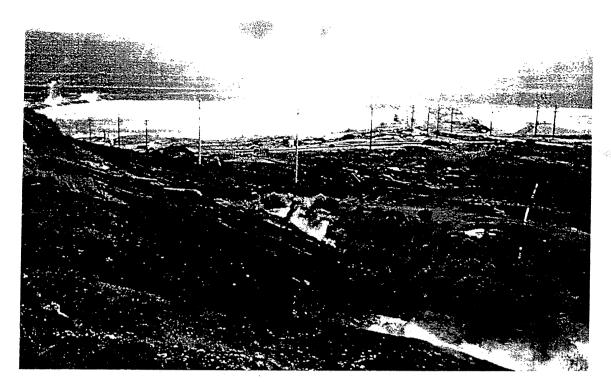


FIGURE 5: Looking north across the worked-out area along No. 4 groyne and across the dirty water reservoir.

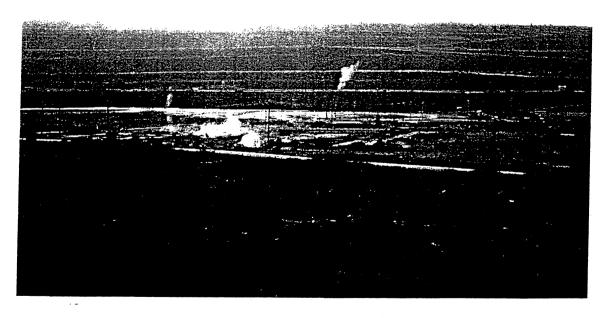


FIGURE 6: Looking north-east to the northern batters across the worked-out area (from same location as for Figure 5 above). Note foliage, vehicular traffic and the 1050 mm diameter dirty water main in mid-picture.

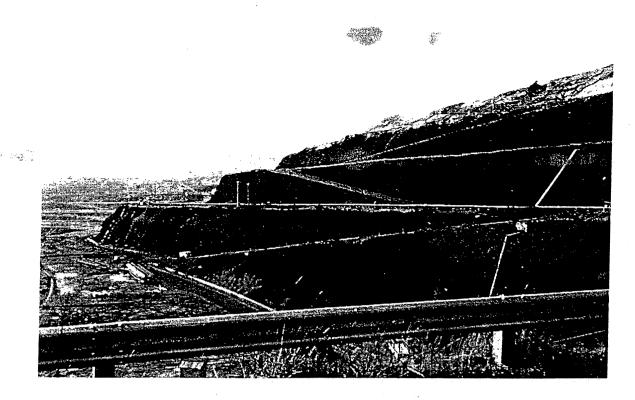


FIGURE 7: Looking generally north along the eastern batters, "20 series" conveyor in mid-picture. Note 6.6 kV power distribution feeder lines no's 15 and 16 coming down the batters on concrete poles.



FIGURE 8: Looking north-north-east down onto "20 series" conveyor, showing their power feed lines (feeders 5, 16 and 4).

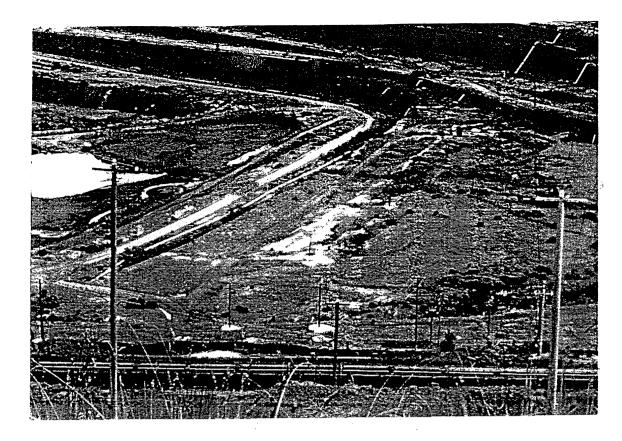
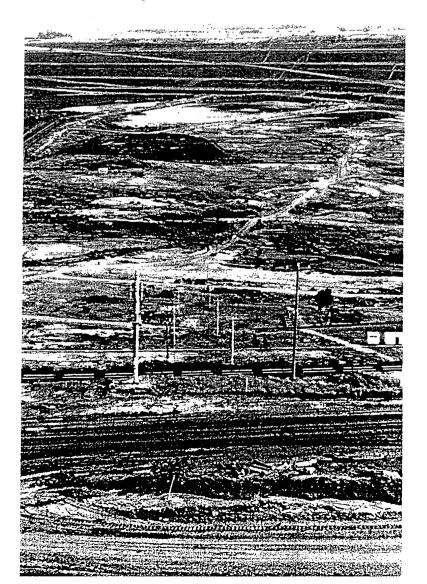


FIGURE 9: Looking north over "20 series" conveyor and along feeder lines 16 and 4 crossing the worked-out area, predominantly on timber poles.

FIGURE 10: Feeders 15 and 16 coming down the eastern batters and across the worked-out area (looking west).



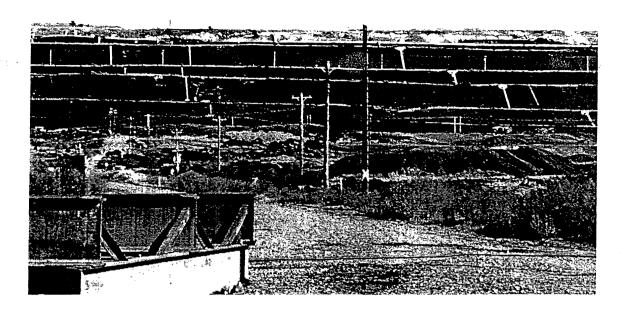


FIGURE 11: Feeders 15 and 16 crossing nearly through the middle of the workedout area on timber poles, looking east.

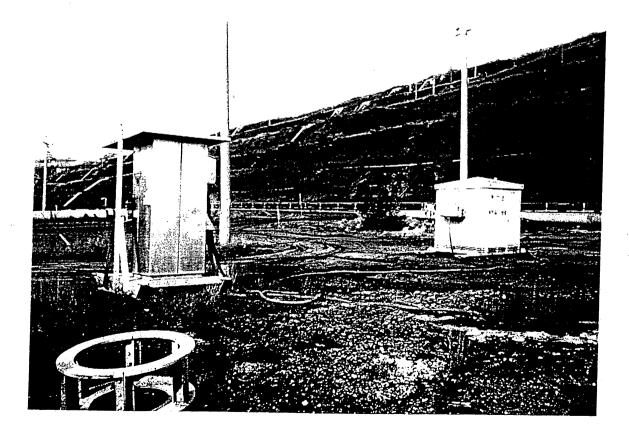


FIGURE 12: Electrical cubicle for switchgear, etc. (at left) and 300 kVA transformer (at right) to power artesian bore pump, located near southern pivot in the worked-out area.

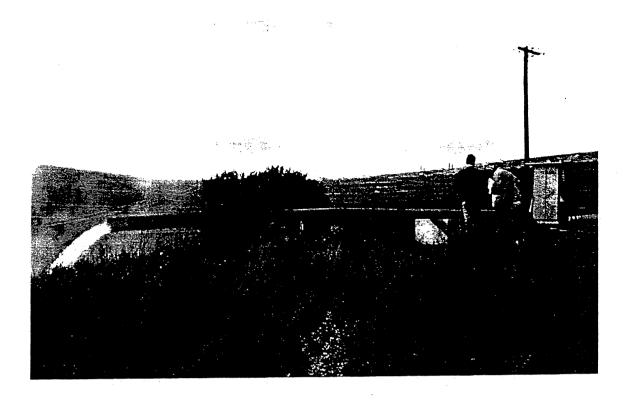


FIGURE 13: Artesian bore pump (per reference in Figure 12). Note electrical cubicle at right; foliage.

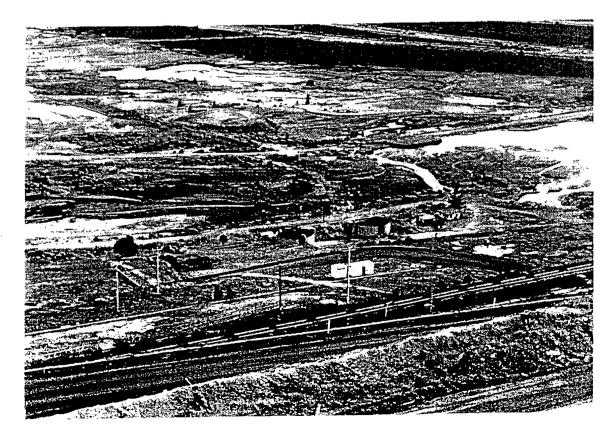


FIGURE 14: Two 100,000 gallon steel tanks, previously used for clean water storage, located on level 2 at the eastern end of the worked-out area. Viewed across "20 series" conveyor in the foreground.

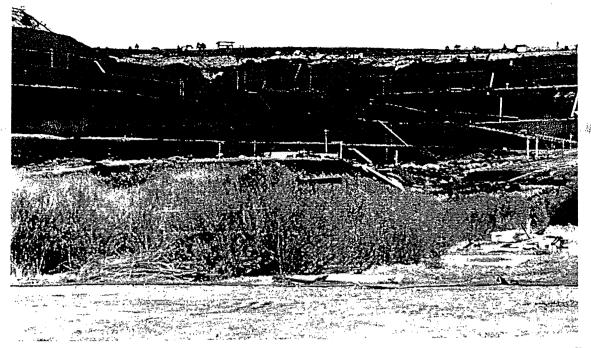


FIGURE 15: Fire detection capability indicated by view from eastern batters fire tower (extreme upper left) and control centre. Top of the two old clean water tanks (reference Figure 14) visible in mid-picture.



FIGURE 16: 100,000 gallon clean and dirty water tanks located near Hazelwood power station, for fire water storage and pressure control of the M.O.C. fire protection system.

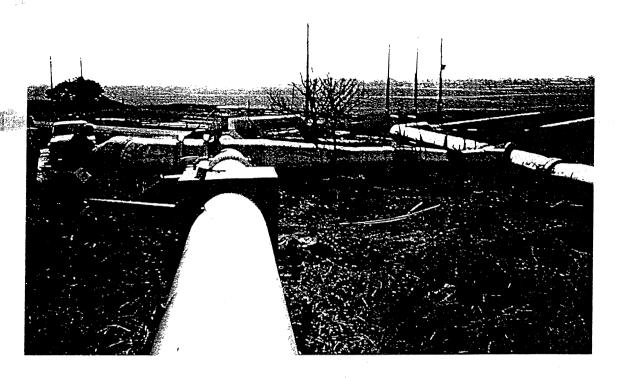


FIGURE 17: "H Section" located on grass level above the mine for valve control and mixing of clean and dirty water. Looking along the clean water line towards the mine, dirty water main on the right.

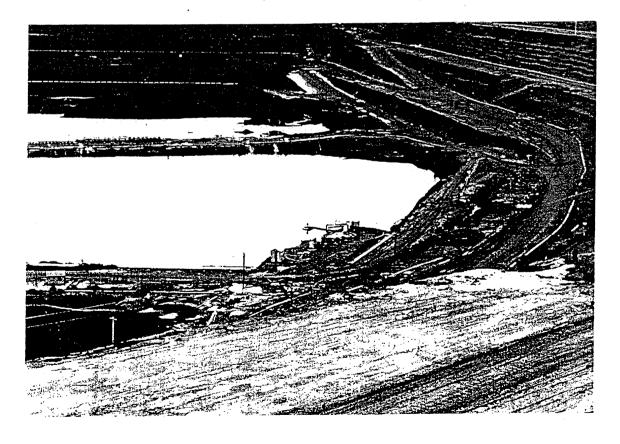


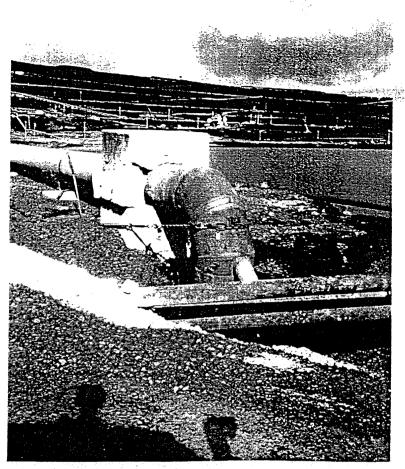
FIGURE 18: View from northern batters down onto dirty water reservoir and dirty water pumping station in mid-picture. Note clay and gravel on the bench/roadway in the foreground.

FIGURE 19:

Section of the second

ji

Dirty water main at northern end of No.3 groyne adjacent dirty water pumping station. Note reinforcement of pipe elbow against water hammer and momentum.



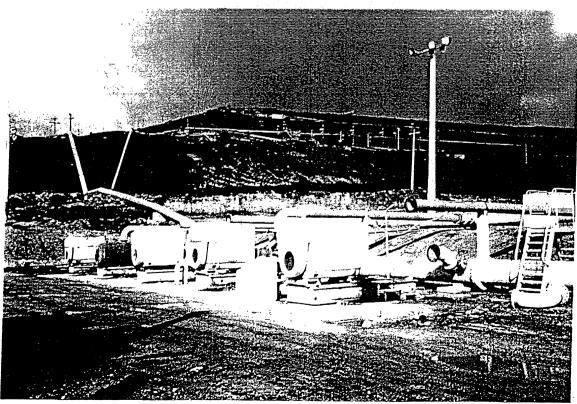


FIGURE 20: Clean water pumping station (looking towards southern pivot); three of five pumps out for repair.

CT\SECV\MORWPHOT:mg

RICHARD OLIVER

Table 1(a) RELEVANCE: OF PREVIOUS MAJOR OPEN. CUT FIRES TO THE PRESENT RISK EXPOSURES OF M.O.

L		THES TO THE	OF THEVIOUS MAJOR OPEN-CUT FIRES TO THE PRESENT RISK EXPOSURES OF M.O.C. WORKED-OUT AREAS
<u></u>	FROM	1077 MOBWELT ORDIN OTTER PARTY	organism spiratification of the state of the
<u> </u>	,	THOSE THE WINDS AND THE PROBLEM COLLEGE OF TH	1992 - MORWELL WORKED-OUT AREAS
	.;	Obtaining assistance from outside organisations: Call to CFA initiated approx. 3 hours after fire was first noticed, and had spread significantly.	Call out is now initiated by Fire Services officer upon spread of fire from point of ignition.
	2.	Other SECV resources deployed from Yallourn Open Cut Fire Services and Engineering Services Forestry Group.	
	ю.	External services: CFA - CFA control vehicle, APM, CMF, RAAF, Regional Office of SES, Gippsland District Police.	
	4.	Five large capacity water tankers obtained from various sources. Vehicle patrols used to combat spot fires, especially along southern and eastern batters.	Now have increased - refer to attached mobile equipment inventory (Table 3).
	5.	600-700 personnel directly involved in fire fighting activity.	Are available in 1992.
	6.	Elevating platform vehicle units used to control fires on high batters. Delay in their availability.	Are available in 1000
	7.		Possible
	∞	Standardisation and compatibility of fire fighting equipment between SEC and those used from external sources.	Are available in 1992.
	6.	Dredger fire protection required a great deal of supplementary fire fighting activity.	Doscikla
	10.	Coal bunker reserves were initially low - total capacity of Hazelwood Slot Bunkers was 25,000 t (had 9,400 tonnes coal). Morwell Raw Coal Bunker capacity 3,600 tonnes (had 400 tonnes coal).	Possible.
	11.	Fire initiated by burning coal particles falling from vehicle exhaust.	D
	12.	enrav evetern in	rossible - remains a significant cause of ignition of fires in the worked-out areas.
	13.	Ring main had not been formed, less pressure than normal being available	Possible.
	14.	Shortage of effective hose application on site.	Possible,
	15.	Pre-warning alerts achieved by declaring Total Fire Ban days or CFA Declared Fire Danger Period. Neither had been declared on the day of the fire.	Now use BYRAM-KEETCH DROUGHT index in addition to these indicators.
	16.	Fire Service installations up to date and in line with open cut fire protection policy and progressive development plans.	LVOCFPP has been reviewed since.
!	17.	Difficulties in effective management and deployment of equipment and inexperienced personnel	Fire frequing for CDCV.
1	18.	Difficulty in contending with fires in high batters and for working under night conditions	Domitic 1
	19.	Road transport used to continue coal supply to Morwell Power Station.	Remains a viable alternation to continue to continue to continue a viable alternation to continue to c
			commence and many to the man transport by conveyor.

and the same of th

Addis.

! :

Table 1(a) RELEVANCE: OF PREVIOUS MAJOR OPEN-CUT FIRES TO THE PRESENT RISK EXPOSURES OF M.O.C. WORKED-OUT AREAS

		AND
FROM	FROM 1977 MORWELL OPEN CUT FIRE REPORT	1992 - MORWEI I'WORKED OFF ABEAS
20.	All welding and flame cutting activities carried out under a permit system.	A THE COURT OF THE PROPERTY OF
21.	Average of 92 fires nor was come account.	Are available in 1992.
	The second of th	Changed "trigger levels" for fire reports - annual average is now 300.
777.	Difficult fire suppression since: a) distance from pipelines/multiple hoses & b) reduced pressure/union bans.	Possible,
23.	Strong 75 km/h winds/direction changes	
100		Possible.
į	rite tineat to: conveyors, cables, dredgers, mobile plant.	Possible,
25.	Reduced maintenance on reticulation system since work was diverted.	Domitia
26.	Appropriate check valve for LVM/ 9. cm	4 COSTOLC,
	the same same same same same same same sam	Not known.
27.	Convert critical valves to remote control and/or m/storised operation.	Not done
28.	Monitoring of operational status of critical valves (open/closed) at Open Cut Control and Fire Service Control Centres.	Not done.
0,0	- And	
	Entable greater use of Hazelwood Cooling Pond as a source of fire service supply.	Possible,
30.	Working party specifically and continuously allocated to maintenance and extension of fire service installations.	Not done to date.
-3	Additional west 510	
	system in the open cut.	Additional Tanker Filling Points are recommended by this report.

The second of th

RICHARD OLIVER

Table 1(b). RELEVANCE OF PREVIOUS MAJOR OPEN-CUT FIRES TO THE PRESENT RISK EXPOSURE OF M.O.C. WORKED-OUT AREAS

i..;

		CHARSENT RISK EAFOSORE OF M.O.C. WORKED-OUT AREAS
FROM	FROM 1944 ROYAL COMMISSION REPORT INTO THE FIRES AT YALLOURN	
11	The fire was initiated external to the mine. It spread to the mine by spotting from nearby bushfire	Still roweible is a form of all
2.		Not applicable.
3.	No overall co-ordinating plan to handle the state of emergency of such magnitude.	Displan is now in place.
4.	Vaguely defined organisational structure of the general fire services.	Improved organisation within SECV and via Displan with other agencies
5.	Separate departments were responsible for their own fire service (power station, open cut and briquette works).	The state of the s
9	Lack of co-ordination of volunteers.	Displan is now in place.
7.	Bush fire likely to originate from north or west of Yallourn.	Not applicable to this study.
δ.	Engineer responsible for fire precaution not expert in the field, able to afford the role only part time attention, and used out of date techniques.	trained firemen and Land S
6	Large quantities of char exhausted from stacks of power station and briquette factory and deposited upon surrounding country side.	No longer takes place.
10.	Fire suppression/protection measures in the mine were not reasonably adequate.	Reticulation and numing canacity increased from 1044 land.
11.	Measures taken for protection during the last two or three hours before the fire started (in the mine) were not adequate; due to erroneous assumptions of winds maintaining prevailing direction.	Improved state of preparedness and improved monitoring of meteorological conditions.
12.	Water sprinklers on each berm at separation distances of 150 feet, to contain fire within compartments.	Same.
13.	Rely on use of hoses to extinguish fires.	Same. Improved design of equipment and more extensive constitive
14.	Unable to adequately fight fire on the faces of the berms: water pressure and flow rate inadequate.	Specially designed monitors are now provided
15.	Provision for better tactical distribution of equipment to the various parts of the mine during a time of emergency.	Done.
16.	Ongoing revision of the water main and sprinkler system be made to reflect the changing needs of the mine.	Significant reviews in 1962, 1964, culminating in the LVOCFPP of 1977 and its revision in 1984.
17.	Upgrade available water pressure.	Design standard is LVOCFPP? No further information available to this endo
18.	SEC Personnel be trained in the use of equipment and fire fighting techniques.	
19.	External assistance; Country Fire Brigade, Air Raids Precaution Body?, The Forest Gang, Volunteers	External agencies now co-ordinated via DISPLAN and Emergency Response plans.
20.	Improve marginal protection.	Part of Land Services fire protection.

4.2

RICHARD OLIVER

Table 1(b). RELEVANCE OF PREVIOUS MAJOR OPEN-CUT FIRES TO THE PRESENT RISK EXPOSURE OF M.O.C. WORKED-OUT AREAS

is Si

1

FROM	FROM 1944 ROYAL COMMISSION REPORT INTO THE FIRES AT YALLOURN	1992 - MORWELL
21.	Engage the services of an adviser on Forest fire protection and suppression who has direct access to the board of commissioners.	Not known. Statutory authority with Dave Francis
22.	Key utility for State of Victoria.	Now a number of other power stations on the state grid - Morwell Power Station is strategically
		important,
23.	Several fires - multiple ignition sources.	Possible
24.	Ignition by bushfires/flying embers.	
		Possible.
25.	"Wanton and illegal behaviour by persons outside SEC control."	Danihla
è		1 Ossibile.
.07	"Fire is an almost unavoidable concomitant of brown coal open cut mining."	Possible,

CTSECV1944COM.TAB:mg

APPENDICES

APPENDIX 1

People contacted during the course of this project are indicated below:

NAME

POSITION/SECTION

NAME	POSITION/SECTION
John Bohan	Mine Planning & Technology - Engineer
Alan Brown	Scientific & Environmental Services
Bill Brown	Fire Services Officer M.O.C.
Rob Curtis	
Graham Dave	Fire Services Officer M.O.C.
Wal Delaney	Engineer, Applied Science Section HRL
Dave Francis	Land Services Officer
Graeme Freshwater	M.O.C. Mine Manager
Rob Gaulton	Regional Geologist
Rob Hutchings	3
Bob Joynt	Head, Applied Science Section HRL
Ian Kruse	Manager, Risk Management & Claims Division
Ted Kuklinsky	M.O.C. Electrical Services
Peter Mackay	M.O.C.
David Murray	Mine Planning & Technology - Engineer
Alf Ottrey	Head, Coal Evaluation Section HRL
Darryl Patching	Scientific & Environmental Services - Applied
•	Technology
Richard Polmear	M.O.C. Production Scheduling Supt.
Chris Salter	Latrobe Valley Systems Protection
	(Land Services, Manager)
Jim Somerville	Geotechnology Services
Rob Supplitt	M.O.C.
Phil Taylor	M.O.C. Electrical Services
Andy Teggart	(Loy Yang) Latrobe Valley Essential Services
Colin Young	Fire Services Officer M.O.C.
U	

APPENDIX 2

PREVAILING WINDS DURING SPRING AND SUMMER AT MORWELL OPEN CUT

Based upon data from air quality monitoring stations located at Thoms Bridge (situated to the north of the mine) and Yinnar South (situated approximately south of the mine), the predominant winds in Spring and Summer prevail from the West and South Westerly directions and are at or above speeds of 5 m/s.

ign con the

Whilst the wind information examined from these stations related only to readings taken over Spring and Summer periods, it highlight that the most common prevailing winds during the period of greatest fire danger would tend to spread a fire within the mine toward the eastern and southern batters.

Therefore, given the occurrence of a fire within the open cut, critical coal transport conveyors and equipment located along the Southern and Eastern batters of the mine becomes vulnerable to the spread of any fire under the influence of winds prevailing from the West and South Westerly directions.

Such fire could possibly initiate in, or progress through, the worked-out areas.

ct/Wind.wk1

RICITARD OF WINDS PREVAILING FROM WESTERLY AND SOUTH—WESTERLY DIRECTIONS AT THOMS BRIDGE AND YINNAR SOUTH AIR QUALITY MONITORING STATIONS.

THOMS BRIDGE

		FREOUENCY	C.Y.		
SOUTH-WEST		Spring		Summer	1
	Year	3pm	All	3pm	All
			Hours		Hours
Winds Equal to	1987/88	19.5%	6.1%	21.6%	9.5%
or in excess	1988/89	12.4%	5.5%	14.0%	6.1%
of 5m/s.	1989/90	14.1%	4.8%	12.7%	7.7%
	1990/91	9.4%	4.2%	14.8%	6.9%
Averages		13.9%	5.2%	15.8%	7.6%

		FREQUENCY	CY		
WEST		Spring		Summer	14
	Year	3pm	All	3pm	All
			Hours		Hours
Winds Equal to	1987/88	31.3%	24.3%	13.4%	9.7%
or in excess	1988/89	40.4%	31.1%	19.8%	10.2%
of 5m/s.	1989/90	30.6%	24.0%	19.0%	8.9%
	1990/91	27.1%	18.9%	29.7%	19.7%
Averages		32.4%	24.6%	20.5%	12.1%

Over ALL SPEEDS,

wind prevailing from the WESTERLY direction were most dominant. (Also significant were winds prevailing from South Westerly direction.)

		FREQUENCY	CY		
WEST		Spring		Summer	1
	Year	3pm	All	3pm	- VII
			Hours		Hours
ALL SPEEDS	1987/88	36.3%	40.3%	21.7%	22.3%
	1988/89	46.1%	45.8%	22.1%	22.5%
	1989/90	38.8%	38.3%	25.3%	19.6%
	1990/91	37.6%	37.2%	32.1%	31.7%
Averages		39.7%	40.4%	25.3%	24.0%

YINNAR SOUTH

		FREOUENCY	NCY		
SOUTH-WEST		Spring	d	Summer	ner
-	Year	3pm	II4	3pm	All
			Hours		Hours
Winds Equal to					
or in excess					
of 5m/s.	1989/90	12.9%	4.6%	13.0%	3.4%
	1990/91	13.3%	3.9%	18.4%	6.4%
Averages		13.1%	4.3%	15.7%	4.9%

Year Spring Summe Year 3pm All 3pm Hours Hours 3pm 1989/90 22.6% 14.8% 3.7% 1990/91 7.2% 4.4% 4.6%			FREQUENCY	NCY		
11 to Hours 1989/90 22.6% 14.8% 3.7% 1990/91 7.2% 4.4% 4.6% 1990/91 7.2% 4.4% 4.6%	WEST		Sprin	8	Sumr	ner
Hours Hours 1989/90 22.6% 14.8% 3.7% 1990/91 7.2% 4.4% 4.6%		Year	$^{\mathrm{ud}}arepsilon$	ΥΠ	3pm	All
1989/90 22.6% 14.8% 1990/91 7.2% 4.4%				Hours		Hours
1989/90 22.6% 14.8% 1990/91 7.2% 4.4%	Winds Equal to					
1989/90 22.6% 14.8% 1990/91 7.2% 4.4%	or in excess					
1990/91 7.2% 4.4%	of 5m/s.	1989/90	22.6%	14.8%	3.7%	0.9%
WC 3 BE E		1990/91	7.2%	4.4%	4.6%	3.3%
1.1% 3.3%	Averages		7.7%	5.3%	3.1%	2.1%

Over ALL SPEEDS,

wind prevailing from the SOUTH WESTERLY direction were most dominant. (Also significant were winds prevailing from Westerly direction.)

		FREQUENCY	NCY		
SOUTH-WEST		Spring	88	Sum	Summer
	Year	3pm	All	3pm	AII
			Hours		Hours
ALL SPEEDS					
1-51ba					
	1989/90	29.0%	36.6%	33.3%	40.2%
	1990/91	39.8%	46.9%	50.6%	46.8%
Averages		34.4%	41.8%	42.0%	43.5%



1

3 AM

3 PM

ALL HOURS

93.ц ω . SPRING (SEP TØ NØV)
1990

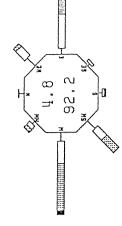
93.4

1.2

10.8 92.2

SUMMER (DEC TO FEB)

1990/91



SERSONAL WIND ROSES

THOMS BRIDGE SPRING & SUMMER ത STATION: SERSONS:

1990/91 YEAR:

CALMS %

FREQUENCIES (%)

> 10 18 5-10 90 2-5 α γ 30

CALM: NIND SPEED LESS THAN OR EOURL TO 0.3 H/3 NOTE: ORTA SOURCE RECORDS HIND SPEEDS TO THE NEAREST 0.1 H/S

າ ນຸ 3 AM SPRING (SEP TO NOV)

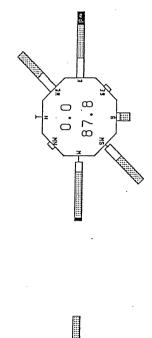
S PM

93.ų

92.3

1989

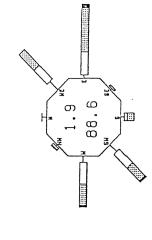
BLL HØURS 93.



3.8 88.9

SUMMER (DEC TØ FEB)

1989/90



SEASONAL WIND ROSES

9 THOMS BRIDGE STATION

SPRING & SYMMER SERSONS:

1989/90 YEAR!

CALMS %

J	(%)	EQUENCIES	FREGI
Σ	CLRSSES	SPEED (MIND

Water Sand	v 10] 66
	5-10	
	2-2	09
		30
(8/W)		
SAFS)))	

CALM. WIND SPEED LESS THAN OR EQUAL TO 0.3 M/S NOTE, DATA SQUACE RECORDS WIND SPEEDS TO THE NEAREST D.1 M/S

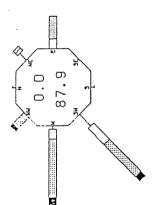


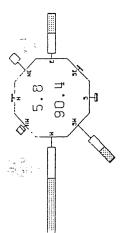
87.9

SPRING (SEP TO NOV)

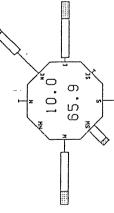
1987

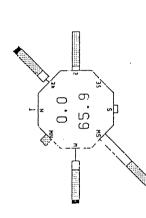
ALL HOURS

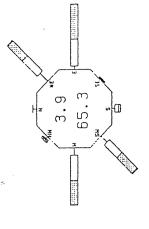




SUMMER (DEC TO FEB) 1987/88







WIND ROSES SEASONAL

THOMS BRIDGE ഗ STATION:

SPRING & SUMMER SEASONS:

1987/88 YEAR:

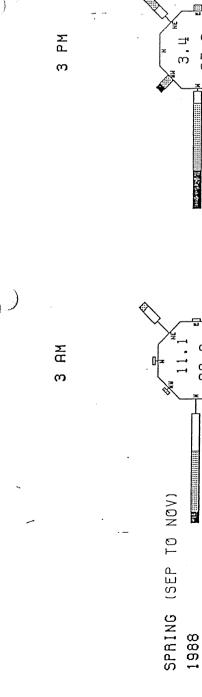
FREQUENCIES (%) CALMS %

0P. %

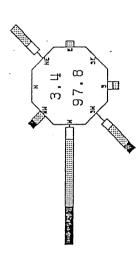
(M/S)	
CLASSES	
SPEED	
I ND	

06
09
30

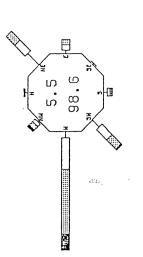
CRLM, NIND SPEED LESS THAN OR EQUAL TO $0.3~\mathrm{M/S}$ NOTE, DATA SOURCE RECORDS WIND SPEEDS TO THE NERREST 0.1 H/S

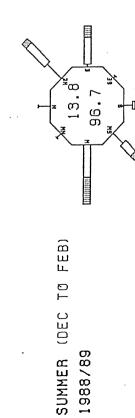


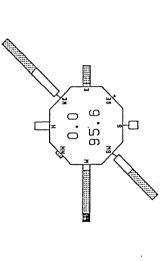
ALL HOURS

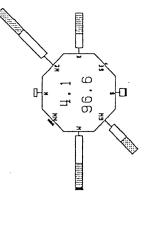


98.9









ı	
ı	
ı	ES
۱	~ :
ı	ш
ı	\overline{S}
ı	Ö
l	=
l	\propto
ŧ	
ł	$\overline{}$
ı	=
l	Z
l	_
ı	=
ı	3
ı	
ı	_
ı	
ı	NA
ı	=
l	_
ı	ົວ
ı	ഗ
ı	u_
ı	$\overline{\Box}$
ı	
ŀ	ഗ
ı	

9 THOMS BRIDGE SPRING & SUMMER STATION: SERSONS:

YEAR

1988/89

CALMS %	OP. %

30	: : : : :
[3]	
FREQUENCIES	

^ 10

5-10

2-5

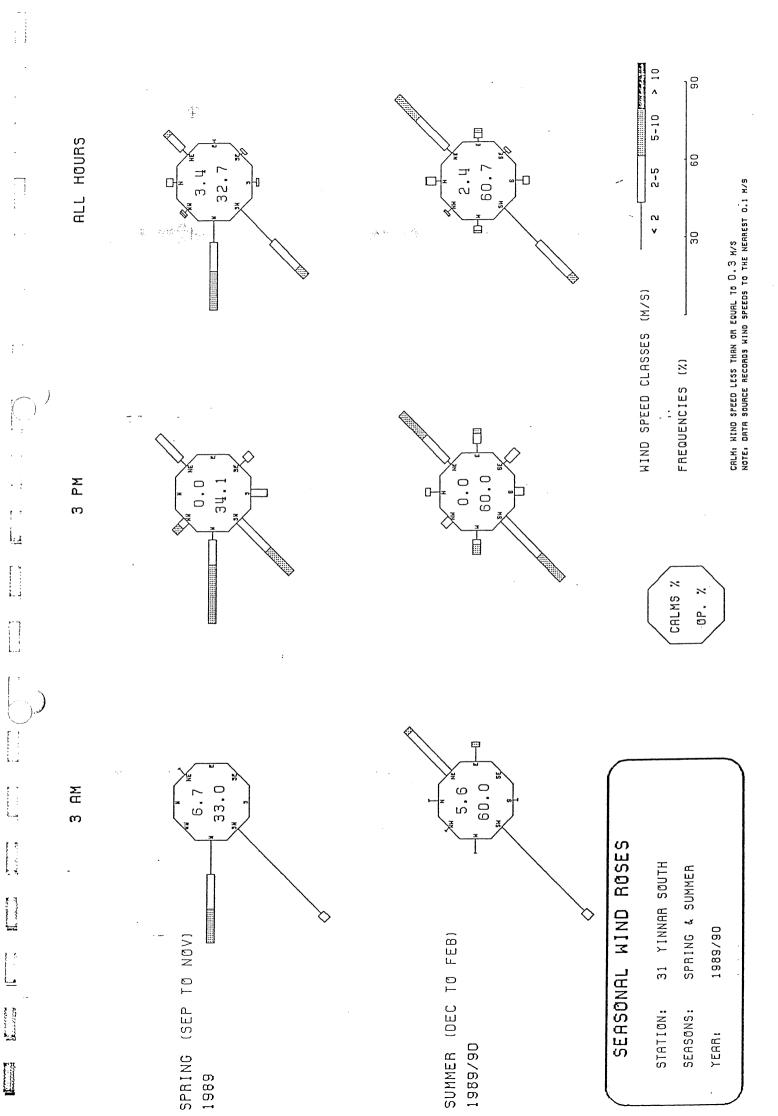
WIND SPEED CLASSES (M/S)

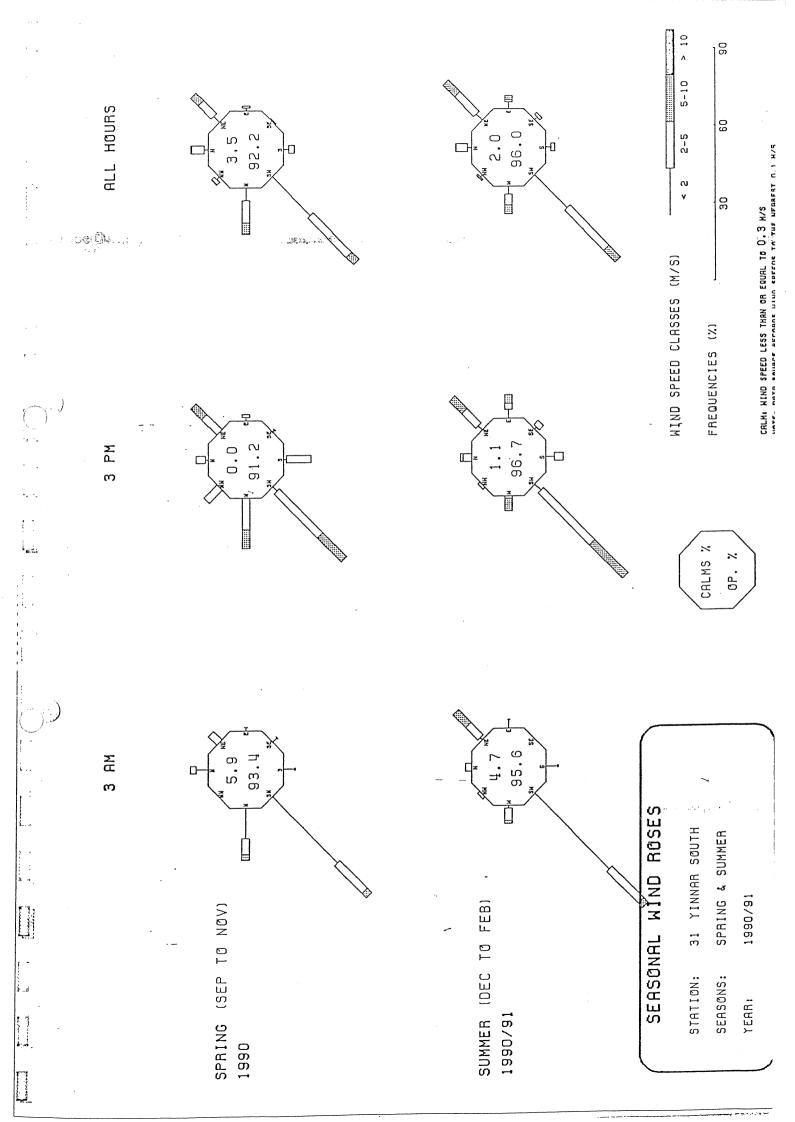
18

60

CALM: NIND SPEED LESS THAN OR EQUAL TO: Ω $_{+}3$ m/s note: Dath squace records hind speeds to the nerest o.t H/s

11





APPENDIX 3

1. HYDRAULIC APPRAISAL OF FIRE WATER DEMAND FOR WORKED-OUT AREAS

1.1 BACKGROUND

The Latrobe Valley Open Cuts Fire Policy details the method for determination of fire water demand in the worked-out areas. Water is required:

- (i) for water spray on exposed coal, prior to the application of clay covering (Section 1.1.5 refers).
- (ii) for fire protection (Section 2.1.2 refers).

The following brief analysis seeks to determine the best estimate of the maximum demand for fire water in worked-out areas, in accordance with the policy.

(i) Exposed Coal in Worked-Out Areas

From site visits and after review of an aerial photograph (scale 1:2500 approx.) there appear to be several sections of the worked-out area where clay covering has not been applied. These sections measure:

400m	X	200	=	80,000
250m	X	200	=	50,000
200m	X	375	=	84,375
250m	X	250	=	62,500
200m	X	300	=	60,000

TOTAL 336,875m²

The extent of water spray coverage is 50%, leaving alternating corridors of wet coal and dry coal of 50 metres width. The design precipitation is given as 6mm/hour.

An allowance for hydraulic balancing of friction losses should provide for up to 15% flow in addition to the minimum. i.e. design for 325 L/second for coal spraying.

(ii) Fire Protection

Section 2.1.2 of the LVOCFP policy outlines the methodology for determination of flow rates as follows, using the greater of design method A or B.

	OPTION A	Required Rate L/Second
(i) (ii) (iii)	all rotary sprays and all machine protection three hydrants on each header on working levels rotary and birdsmouth sprays, for quarter length of trunk conveyor	Nil Nil Nil
	OPTION B	Required Rate L/Second
(i) -	one half rotary sprays and all machine protection on working levels	Nil
(ii)	three hydrants per header for half headers on working face	Nil
(iii)	rotary and birdsmouth sprays for half length trunk conveyor	Nil
(iv)	three hydrants per header for half trunk conveyor	Nil

It is instructive to note that the policy presumes that the exposed coal surfaces will be clay covered - hence there is no perceived need for an allowance for hosestreams in such areas.

(iii) Other Design Considerations

The remaining sections of Clause 2 in the policy relate to requirements for the fire protection water supplies. These include:

- dual sources; minimum supply to provide 50% of calculated demand.
- adequate capacity for 24 hours plus make-up.
- maximum system pressure of 115m.
- remote system monitoring of critical functions.

1.2 HYDRAULIC CALCULATION METHODS

A precise analysis of the hydraulic performance of the various fire water systems is beyond the immediate scope of this study. There are severe limitations regarding the available data, including the currency of reticulation drawings (discrepancies exist), pipe leakage rates, and details on equivalent pipe-roughness co-efficients. The collection of this data has not yet been undertaken by SECV - the following methodology is therefore limited.

Important design constraints are:

- (i) duplicated water supply; minimum to provide 50% of calculated demand (LVOCFPP)
- (ii) duplicated Main Supply Lines (LVOCFPP)
- (iii) calculation based on worst case flow path. (AS 2419)

Friction loss in pipes can be given by the Hazen Williams equation (refer AS 2118, ϕ 12-9)

$$P = \frac{6.05 \times Q^{1.85} \times 10^7}{C^{1.85} \times d^{4.87}}$$

Where

" DATES

P = pressure loss (kPa/metre)

Q = Water flow rate (L/min)

d = mean internal pipe diameter (mm)

C = pipe roughness coeff. 120 (mild steel)

This can be simplified as $P = kQ^{1.85}$, for various pipe diameters.

d (mm)	k
1400	4.11 x 10 ⁻¹²
1000	2.11 x 10 ⁻¹¹
760	8.05 x 10 ⁻¹¹
600	2.54 x 10 ⁻¹⁰
450	1.03 x 10 ⁻⁹
300	7.44 x 10 ⁻⁹
200	5.36 x 10 ⁻⁸

mot

Pipe layout is given by SECV drawings LV61/1-3/26F and MS 12-2-1/5/3 and amendments given by Mr W. Brown. The water supply should be adequate for the worst case i.e. the hydraulically most remote location in the worked-out area. A variety of locations were considered as possible supply/demand locations. Valve 303 was selected as the notional 'most remote location' due to its hydraulic disadvantage (highest of the low pressure zone), and its being most distant from the water supplies. Valve 303 is located adjacent to a coal production area (refer to figure 3), but is otherwise considered to represent the 'most remote location' in the worked-out area.

The following trial calculations indicate that a satisfactory supply is available based on the calculation methods discussed above. With the reduced reticulation (as described by W. Brown) the available pressure is reduced by 22% to 580 kPa. This is still considered to be satisfactory.

A trial calculation on losses to valve OB01 has been made. This valve is located at level 0 adjacent to the conveyor transfer point - a vulnerable area. At the nominated flow demand of 325 L/sec, adequate pressure would be available.

75 m x 610 mm (407-404) 225 m x 450 mm (404-402) 250 m x 200 mm (402-303)

Total equivalent parallel feed losses = 230 kPa.

Total Friction Loss = 320 kPa Available Static Head on Level 3 = 900 kPa Computed Residual Pressure @ = 325 L/sec is 580 kPa; is satisfactory.

Refer also to attached calculation sheets/gradient sheets.

1.2.2 DW Pumps/Northern Batters/Valve 303 (complete reticulation - refer dwg No. MS 12-2-1/5/3)

Flow rate = 325 L/second

Pipe Run (m x mm)	Friction Loss (KPa)
325 m x 1000 mm	0.6
1000 m x 450 mm	89.0
750 m x 610 mm	16.5
550 m x 450 mm	<u>49.0</u>
Total Friction Loss	<u>155.0</u> kPa

1

:50m

Available static head on level 3 = 900 kPaComputised minimum residual pressure 325 L/sec is 745 kPa; is satisfactory. Note: this is considerably greater than scenario 1.2.1.

STAL.

1.2.3 D Tank/Southern Batters/Valve 0B01

Flow rate = 325 L/second

Pipe Run (m x mm)	Friction Loss (kPa)
1250 m x 1050 mm	2.3
100 m x 760 mm	0.7
625 m x 450 mm	55.6
175 m x 300 mm	<u>112.5</u>
	<u>169.5</u> kPa

Total Friction Loss = 170.0 say.

Available static head on level 1 = 800 kPa Computed Residual Pressure @ 325 L/sec is 630 kPa; is satisfactory.

2. FIRE FUNDAMENTALS

2.1 Mechanism of Fire

The mechanism of fire development should be considered when any review of the LVOCFPP is undertaken. The following aspects of fire development are interdependent:

- effect of fire prevention.
- time for detection of fire.
- time for suppression of fire.

2.2 Morwell Open Cut Mine Brown Coal Characteristics

There is a higher incidence of fires in the Morwell open cut mine, in comparison to Yallourn. Possible reasons for this difference could lie in comparison of the spontaneous ignition properties, ability of the coal to oxidise and the effectiveness of fire suppressants.

A brief consideration of the ignition characteristics of the Morwell and Yallourn coal indicates that, although there is some difference in the ignition temperatures of the coal, these differences are believed to be insignificant with respect to the higher fire incidence rate at the Morwell open cut mine. The Morwell coal has a higher concentration of cations than the Yallourn coal, which leads to slightly lower ignition temperatures. The presence of cations in coal has been identified as a catalyst for the coal oxidation process.

There is some qualitative evidence to suggest that Yallourn coal has a greater tendency to oxidise and spontaneously combust. The Yallourn coal is a younger coal with greater porosity and so presents a greater effective surface area for oxidation.

It may be concluded that the higher incidence of fires at the Morwell open cut mine is possibly then due to factors other than the inherent properties of the coal itself. Geophysical site conditions, work practices, ignition sources, levels of activity and surface area of exposed coal may be more significant influences on the fire risk.

The state of the coal on site may also be an important factor. Brown coal in the weathered state undergoes oxidation with the atmosphere. Where the rate of heat dissipation is less than the heat generation from the oxidation process, combustion can occur. The locality of the exposed coal in the open cut can effect the rate of heat dissipation. Cracks and fissures in the coal, for example in weathered batters, allow oxidation to occur deep in the coal seam with no effective mechanism to dissipate the generated heat, resulting in potential fire sources. Also, loose coal that has been piled or deposited around roads or train lines are another significant ignition source as the coal is aerated and oxidises throughout the coal pile.

The use of water as an effective fire suppressant for brown coal is also limited. As water is used to extinguish a coal fire, the immediate effect is to quench the fire by cooling the coal site and restriction of available oxygen. Due to the fine porosity of the coal, there is little or no penetration of the water into the interior of the coal particles. Once the water has drained from the coal, the interior of the coal is then able to oxidise and dependant on the rate of heat dissipation, combustion can then recur. Wetting agents added to the water can improve the ability of the water to penetrate the coal pores, and so improve the effectiveness of the fire suppression. Localised fires that occur in the coal seam are more effectively dug out and removed.

3. RECOMMENDATIONS

4- ..

- 3.1 Update reticulation drawing and hydraulic analysis using computer modelling.
- 3.2 Suggest revisions to LVOCFPP:
 - (i) 6 mm/hour precipitation rate seems to be based on 1964 report of 0.25 inch/hour. Check appropriateness.
 - (ii) Specify number, distance, capacity requirements for Tanker Filling Points.
 - (iii) Remote monitoring for fire pumps and other critical fire protection equipment.

4. EVALUATION OF APPLICABLE CODES AND STANDARDS.

In addition to the in-house Latrobe Valley Open Cuts Fire Protection Policy (LVOCFPP), there are other codes and standards which may apply. A comparison of these has not been undertaken for this report. It is important to note that the winning of coal by open-cut methods is not the subject of statutory control by Mines Regulations. A large part of the control has been via internal documentation prepared specifically for the conditions in the Latrobe Valley. Comparison with codes prepared in other countries, or for other bodies of coal deposits, may not necessarily be compared with SECV policies.

Other Australian Standards which may apply are:

AS 1221	Fire Hose Reels
AS 1603	Automatic Fire Detection and Alarm Systems
AS 1674	SAA Cutting and Welding Safety Code
AS 1768	Lightning Protection
AS 2118	Automatic Fire Sprinkler Systems
AS 2419	Fire Hydrant Installations
AS 2441	Installation of Fire Hose Reels
AS 2444	Portable Fire Extinguishers - Selection and Location
AS 2941	Fixed Fire Protection Installations - Pumpset Installations

American NFPA Standards which may apply:

NFPA 121	Standard on	Fire	Protection	for	Self-Propelled	and	Mobile
	Surface Minin						

NFPA 123 Standard for Fire Protection and Control in Underground Bituminous Coal Mines

NFPA 30 Centrifugal Fire Pumps

TOTAL COSSES KRE DW PUMPS > 407: 89.6 kPa 407 -> 303 : 230 319.6 Say 320 kPa	450 mm 3037 and 250m/200 mm 3037 MINIMUM 700 mm 700 mm 700 mm 700 mm 700 mm	(a) (b)	polance (2550 t/min) 2550 t/min 53500 "
355m/1000mm 0.59 km 1. 12 15. m/610mm 12. 15. m/610mm	@30004min FL=0.05 kPa + 0.63 + 36.29	FOR 407-303 FROM CHART 2/2	6=3200 + 4400 7600 L/min MJundevie 10.6.92

SECUL MOS	6/92 JUNIEVE 1062
HYDRAULE GRADIENTS	RICHARD OLIVER
DW PUMPS/NORTHORN BATTERS/VALVE 303	
(REDUCED RETICULATION)	
mm/ 407/303	
106 /201	
ntr	
	-
un	
· wi	
m/1	£(6) \ 507/203
10ga-	-844G X190
10 15 20 25 30 35 40 45	وو 95
FLOW - L.P.M.	
Estimated Total Water DemandL.P.M. @	

VE ER SUPPLY ANALYSIS GRAH

SECV /	88					26/95 END	DANCEVE 2 9 2	\$ No.
TYPEAULO 350	{	GRADIANS				RICE	RICHARD OLIVER	T'TVE
AN PUMPS		NORTHERN BATTERS VALVE 303	STATE OF	25 VALV	508 3			
GEARCED (SEE	1	ROTTCULATION)	AJOH)				-	
009								
550								
200								
450					4			
400					m	(n		
350	A:				70	5/7		
000					<i>096</i>	97. 096		
250					/ —	~	EGUIVALENT GRADIENT	GRADIENT
win					230kPa-	\sim	EL PURES	303
								-
209							n de la compacto	
Z-		\					The state of the s	The same of the sa
1	40 619							
5 10 15 20	25 3	30 35	40	45		50	55	. 60
				FLOW - L	FLOW - L.P.M 4400	9		
Estimated Total Water Demand	ter Demand			L.P.M. @		kPa. Dur	Duration	Minutes
	-	-	-	(:	ě
Estimated Water Demand for Sprinklers	mand tor Sp	prinklers	1.1 1.1	L.P.M. @		kPa, +	L.P.M. H	L.P.M. Hose Streams

PRESSURE - KPa

APPENDIX 4

SUMMARY OF REPORTED FIRES IN WORKED-OUT AREAS OF M.O.C.

SECV MORWELL OPENCUT COALMINE FIRE REPORT EXTRACT (Nov.'89 to April '92.)

RELATING TO THE WORKED OUT AREA OF THE MINE

11.06.92 Page 1.

)		77
Report No: A0083 Date: 15.12.89 Location Item No: 24 OTHER (SPECIFY: Burning Item No: 25 COAL/PF Prob Cause Item A: 37 Prob Cause Item Damage Y/N: N Contrib Factor Desc: BURNING & WELDING	Date: 15.12.89 Time Attend: 11.05 OTHER (SPECIFY) COAL/PF Prob Cause Item B: HOT WORK(WELD, CUT Damage Description: NING & WELDING	Time Extinguished: 11.25 Time Completed: 11.25 Plant Description: 7 LEVEL S/E CORNER AMONG OLD UNITS Description Burning: OLD TRAILING FRAME Prob Cause Description: BURNING & WELDING Contrib Item No: 50 HUMAN INACTION)))
How Extinguished: PIPED WATER		Equipment Hours: Actual Cost:	Cosmos No:
Report No: A0918 Location Item No: 24 C Burning Item No: 31 R Prob Cause Item A: 37 P Damage Y/N: N Contrib Factor Desc:	Date: 18.01.90 Time Attend: 14.10 OTHER (SPECIFY) RUBBISH Prob Cause Item B: HOT WORK(WELD,CUT Damage Description:	Time Extinguished: 14.20 Time Completed: 14.25 Plant Description: LARGE RUBBISH BIN Description Burning: Prob Cause Description: SPARKS FROM BURNING & WELDING DRO Contrib Item No: 49 HUMAN ACTION	pleted: 14.25 Alarm time: 14.10 & WELDING DROPPED IN BIN
How Extinguished: PIPED WATER	WATER Support ManHours:	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A0938 Date: 14.02.90 Location Item No: 21 ON OR NEAR ROAD Burning Item No: 25 COAL/PF Prob Cause Item A: 37 Prob Cause Item Damage Y/N: N Contrib Factor Desc: BURNING & WELDING	Date: 14.02.90 Time Attend: 8.45 ON OR NEAR ROADWAY COAL/PF Prob Cause Item B: HOT WORK(WELD,CUT Damage Description: NING & WELDING	Time Extinguished: 9.20 Time Completed: 9 Plant Description: 4 LVL EAST CUTTING CRAP UNITS Description Burning: COAL Prob Cause Description: BURNING & WELDING Contrib Item No: 49 HUMAN ACTION	9.20 Alarm time: 8.45
How Extinguished: WATER TANKER	Support ManHours:	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A1152 Location Item No: 22 V Burning Item No: 25 C Prob Cause Item A: 39 F Damage Y/N: N Contrib Factor Desc: FIRE	Report No: A1152 Date: 24.02.90 Time Attend: 14.40 Location Item No: 22 VEHICLE OR MOBILE PLANT Burning Item No: 25 COAL/PF Prob Cause Item A: 39 Prob Cause Item B: HOT ENGINE OR EXH Damage Y/N: N Damage Description: Contrib Factor Desc: FIRE FOUND a EXHAUST & MOTOR	Time Extinguished: 14.45 Plant Description: 11064 DOZER Description Burning: LOOSE COAL Prob Cause Description: ENGINE OVERHEATING COAL DUST Contrib Item No: 52 DESIGN	Alarm time: 14.40
How Extinguished: WATER	Support ManHours:	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A1155 Date: 25.02 Location Item No: 21 ON OR NEAR Burning Item No: 35 GRASS/SCRUF Prob Cause Item A: 47 Prob Cause Damage Y/N: N Damage Contrib Factor Desc: CAUSE UNKNOWN	Date: 25.02.90 Time Attend: 14.30 ON OR NEAR ROADWAY GRASS/SCRUB Prob Cause Item B: UNKNOWN Damage Description:	Time Extinguished: 14.45 Time Completed: 14.45 Plant Description: ON SIDE OF ROAD NEAR PJM WASH N/S Description Burning: DRY GRASS Prob Cause Description: UNKNOWN Contrib Item No:	45 Alarm time: 14.30 I/S 1 LVL
How Extinguished: WATER	Support ManHours:	1.00 Equipment Hours: 1.00 Actual Cost:	Cosmos No:

SECV MORWELL OPENCUT COALMINE Nov.'89 to April '92.) FIRE REPORT EXTRACT

RELATING TO THE WORKED OUT AREA OF THE MINE

11.06.92 Page 2.

Alarm time: 9.25 Alarm time: 8.30 Alarm time: 11.35 Alarm time: 10,50 Alarm time: 14.00 Cosmos No: Cosmos No: Cosmos No: Plant Description: DBL BUNKER HALF WAY ALONG M52 CONVEYOR Time Completed: 9.35 Time Completed: 11,40 Time Completed: 10.59 Time Completed: 14.25 53 ENVIRONMENTAL (WIND, RAIN, S/C) Plant Description: EXCAVATOR 6F23 3 LEVEL N/SIDE Time Completed: Plant Description: 8 LEVEL DUMP DOZER 11G135 Prob Cause Description: LOOSE COAL AROUND EXHAUST Description Burning: LOOSE FINE COAL Prob Cause Description: COAL AROUND EXHAUST AREA Plant Description: 7 LEVEL NTH EAST CORNER Prob Cause Description: HOT COAL OFF DUMP TRUCK 'Actual Cost: Actual Cost: Actual Cost: Actual Cost: Plant Description: 5 LEVEL S/EAST CORNER Description Burning: COAL ON SIDE OF ROAD Description Burning: LOOSE COAL AND GRASS Prob Cause Description: BURNING & WELDING Contrib Item No: 49 HUMAN ACTION Contrib I tem No: 52 DESIGN DESIGN Description Burning: LOOSE COAL Prob Cause Description: UNKNOWN LOOSE Time Extinguished: 9.25 Time Extinguished: 9.00 Time Extinguished: 11.40 Time Extinguished: 10.59 Time Extinguished: 14.25 Equipment Hours: Equipment Hours: Equipment Hours: Description Burning: Equipment Hours: Contrib Item No: Contrib Item No: Contrib Item No: 5 .50 .30 52: Support ManHours: Support ManHours: Support ManHours: Support ManHours: HOT WORK (WELD, CUT HOT ENGINE OR EXH EXH 9.25 Damage Y/N: Y Damage Description: 1 X 64 FIRE HOSE Contrib Factor Desc: NO OBVIOUS REASON FOR FIRE 8.30 OTHER (SPECIFY) Time Attend: 11.35 Time Attend: 10.50 Time Attend: 14,00 ENGINE OR Time Attend: Time Attend: UNKNOMN 된 How Extinguished: MAN TANKER, 1 DRY POWD.EXTING. Damage Description: Damage Description: Prob Cause Item B: Damage Description: Damage Y/N: N Damage Description: Contrib Factor Desc: ENGINE EXHAUST VEHICLE OR MOBILE PLANT Contrib Factor Desc: LOOSE COAL AROUND EXHAUST ON OR NEAR ROADWAY COAL/PF Prob Cause Item B: Date: 29.10.90 ON OR NEAR ROADWAY Prob Cause Item B: Prob Cause Item B: Prob Cause Item B: ON OR NEAR ROADWAY COAL/PF RAW COAL BUNKER Date: 9.07.90 Contrib Factor Desc: BURNING & WELDING Date: 31,10,90 Date: 2.12.90 Date: 6.11.90 COAL/PF COAL/PF COAL/PF How Extinguished: PIPED WATER How Extinguished: PIPED WATER How Extinguished: PIPED WATER 21 25 37 25 39 39 48 47 22 25 Contrib Factor Desc: Prob Cause Item A: cocation Item No: Location Item No: -ocation Item No: .ocation Item No: Location Item No: Burning Item No: How Extinguished: Report No: A1530 Burning Item No: Burning Item No: Burning Item No: Burning Item No: Report No: A132? Report No: A1534 Report No: A1539 Report No: A1571 Damage Y/N: N Damage Y/N: N Damage Y/N: N Damage Y/N: N Damage Y/N: Y

Cosmos No:

Actual Cost:

8.

Equipment Hours:

5.

Support ManHours:

11.06.92 Page 3.

RELATING TO THE WORKED OUT AREA OF THE MINE

SECV MORWELL OPENCUT COALMINE FIRE REPORT EXTRACT (Nov.'89 to April '92.)

23 Prob Cause Item B: HOT ENGINE OR EXH Prob Gascription BUILDUP OF COAL AROUND EXALUST AREA CONTRIB LOR EXHAUST 29 Prob Cause Item B: HOT ENGINE OR EXH Prob Gascription BUILDUP OF COAL AROUND EXALUST AREA COALLY FOR EAST STANDS 21 ON CHANGES AND TIME Attend: 12.00 Time Extinguished: 12.25 Time Completed: 12.30 Prob Cause Description UNKNOWN PLOS COALLY FOR EXALUST TIME Extinguished: 12.30 Prob Cause Item B: UNKNOWN PRESCRIPTION UNKNOWN PRESCRIPTION ON SIDE OF ROLD AT DELL'S CALLYP PROCESSES ITEM B: UNKNOWN PRESCRIPTION UNKNOWN PRESCRIPTION UNKNOWN COALLY PROCESSES ITEM B: UNKNOWN PRESCRIPTION UNKNOWN COALLY PROCESSES ITEM B: UNKNOWN PRESCRIPTION UNKNOWN COALLY PROCESSES ITEM B: UNK	Report No: A1590 Location Item No: 21	Date: 13.12.90 ON OR NEAR ROADWAY	Time Attend: 14.45	Time Extinguished: 14.50 Plant Description: 1 FV	50 Time Completed: 14.50	Alarm time: 14.45
PIPED WATER 21 OACH/PF WATER ROADWAY 22 OACH/PF WATER ROADWAY Description: ONE SIDE OF FORDWAY BELOW DELL 23 OACH/PF WATER ROADWAY Demands Description: ONE SIDE OF FORDWAY BELOW DELL 24 OACH/PF WATER ROADWAY Demands Description: ONE SIDE OF FORDWAY BELOW DELL 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 29 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 21 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 21 OACH/PF WATER 21 OACH/PF WATER 21 OACH/PF WATER 22 OACH/PF WATER 23 OACH/PF WATER 24 OACH/PF WATER 25 OACH/PF WATER 26 OACH/PF WATER 27 OACH/PF WATER 28 OACH/PF WATER 29 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 20 OACH/PF WATER 21 OACH/PF WATER 22	Burning Item No: 25 Prob Cause Item A: 39 Damage Y/N: N Contrib Factor Desc: EN	COAL/PF Prob Cause Item B: Damage Descripti	HOT ENGINE OR		LL AVSIDE COAL JP OF COAL AROUND EXHAUST AREA DESIGN	
The Extinguished: 12.25 Time Completed: 12.30 Time Extinguished: 12.25 Time Completed: 12.30 T	งฟ Extinguished: PIPED) WATER	Support ManHours:		Actual Cost:	Cosmos No:
Date: 31.12.90 Date: 31.12.90 Date: 31.12.90 Time Extinguished: 14.30 Damage Description: ON SIDE Date: 4.01.91 Time Extinguished: Date: 4.01.91 Date	sport No: A1603 cation Item No: 21 Irning Item No: 25 ob Cause Item A: 47 Image Y/N: N	Date: 31.12.90 ON OR NEAR ROADWAY COAL/PF Prob Cause Item 8: Damage Descripti	me Attend: UNKNOWN		OF R	Alarm time: 12.00
Date: 31.12.90 Time Attend: 14.15 Time Extinguished: 14.30 Time Completed: 14.35 Plant Description: ON SIDE OF ROAD AT DBL Description: UNKNOWN Sec: UNKNOWN Sec: UNKNOWN Damage Description: Sci UNKNOWN Sec: OAL PE Date: 4.01.91 Time Attend: 8.20 Time Extinguished: Time Extinguished: Plant Description: Contrib Item No: 51 EQUIPMENT MALFUNCTION Contrib Item No: 51 EQUIPMENT MALFUNCTION Sec: POAL PE Date: 19.02.91 Time Attend: 14.40 Time Extinguished: 14.55 Time Completed: 14.55 Plant Description: COAL BUILD UP ARQUING BOTTOM OF FAN BELT Coal Dust Item B: FRICTION(BELT/MAC Prob Cause Description: COAL ARQUING BOTTOM OF FAN BELT Coal Dust Item B: FRICTION(BELT/MAC Prob Cause Description: COAL ARQUING BOTTOM OF FAN BELT Coal Damage Description: Contrib Item No: 52 DESIGN Support ManHours: Equipment Hours: Actual Cost: Coal Dust ManHours: Coal Dust	ы Extinguished: PIPED) WATER	oddns		Actual Cost:	Cosmos No:
Support ManHours: 1.00 Equipment Hours: .33 Actual Cost: Cosmos Date: 4.01.91 Time Attend: 8.20 Time Extinguished: Time Completed: Plant Description: Damage Description: Contrib Item No: 51 Equipment MalFunction Cosmos Damage Description: Contrib Item No: 51 Equipment MalFunction Cosmos Date: 19.02.91 Time Attend: 14.40 Time Extinguished: 14.55 Plant Description: Dozer 116.35 1 Level NoRTH Side Description: Coal.PF Prob Cause Item B: FRICTION(BELT/MAC Prob Cause Description: Coal.DP AROUND BOTTOM OF FAN BELT Completed: 14.55 Plant Description: Coal.DP AROUND BOTTOM OF FAN BELT Completed: Cosmos Damage Description: Coal.DP Redual Cost: Coal.DP Redual Cost: Cosmos Coal.DP MAITER Support ManHours: Equipment Hours: Actual Cost: Cosmos	port No: A1604 ocation Item No: 21 urning Item No: 25 ob Cause Item A: 47 mmage Y/N: N	Date: 31.12.90 ON OR NEAR ROADWAY COAL/PF Prob Cause Item B: Damage Descripti	me Attend UNKNOWN	Time Extinguished: 14.30 Plant Description: ON SIC Description Burning: COAL Prob Gause Description: UNKNOV Contrib Item No:	. ∝	Alarm time: 14.15
Date: 4.01.91 Time Attend: 8.20 Time Extinguished: 11 POWER POLE NO./LINE NO. 33 ELECT EQUIP 43 Prob Cause Item B: ELECT FAULT-SHORT Prob Cause Description: 54 Prob Cause Item B: ELECT FAULT-SHORT Prob Cause Description: 55 COAL/PF 41 Prob Cause Item B: ELECT FAULT-SHORT Prob Cause Description: 56 COAL/PF 57 COAL DUST AROUND FAN BELT 58 PIETE OR MOBILE PLANT 58 PIETE OR MOBILE PLANT 59 PIETE OR MOBILE PLANT 50 COAL DUST AROUND BOTTOM OF FAN BELT 59 COAL DUST AROUND FAN BELT 50 COAL DUST AROUND FAN	ы Extinguished:		Support ManHours;	Equipment Hours:		Cosmos No:
Date: 19.02.91 Time Attend: 14.40 Time Extinguished: 14.55 Time Completed: 14.55 VEHICLE OR MOBILE PLANT Description: DAMAGE 116.135 1 LEVEL NORTH SIDE Description: DAMAGE DESCRIPTION BOTTOM OF FAN BELT COAL/PE Prob Cause Description: COAL AROUND BOTTOM OF FAN BELT COAL/BUST AROUND FAN BELT COAL/BUST AR	Report No: A1612 Location Item No: 11 Burning Item No: 33 Prob Cause Item A: 43 Damage Y/N: N	Date: 4.01.91 POWER POLE NO./LINE ELECT EQUIP Prob Cause Item B: Damage Descripti	, E	51	Time Completed:	Alarm time: 8.20
Date: 19.02.91 Time Attend: 14.40 Time Extinguished: 14.55 Time Completed: 14.55 22 VEHICLE OR MOBILE PLANT 25 COAL/PF 4: 41 Prob Cause Item B: FRICTION(BELT/MAC Prob Cause Description: COAL BUILD UP AROUND BOTTOM OF FAN BELT Contrib Item No: 52 DESIGN esc: COAL DUST AROUND FAN BELT : PIPED WATER Completed: 14.55 Part Description: Coal Around Bottom of Fan Belt Coal Around Bottom of Fan Belt Coal Around Fan Belt Coal Fan Belt Coal Around Fan Belt Fan	งพ Extinguished: PIPEG) WATER	Support ManHours:		Actual Cost:	Cosmos No:
Support ManHours: Equipment Hours: Actual Cost:	eport No: A1702 ocation Item No: 22 urning Item No: 25 rob Cause Item A: 41 amage Y/N: N	Date: 19.02.91 VEHICLE OR MOBILE PL COAL/PF Prob Cause Item B: Damage Descripti	ime Attend T FRICTION	.55 DOZER COAL COAL 52	Time Completed: 14.55 11G135 1 LEVEL NORTH SIDE 3UILD UP AROUND BOTTOM OF RADI/ AROUND BOTTOM OF FAN BELT DESIGN	
	ом Extinguished: PIPEC	D WATER	Support ManHours:	Equipment Hours:	Actual Cost:	Cosmos No:

RICHARD OLIVER

11.06.92 Page 4.

RELATING TO THE WORKED OUT AREA OF THE MINE

SECV MORWELL OPENCUT COALMINE FIRE REPORT EXTRACT (Nov.'89 to April '92.)

	OTHER (SPECIFY) COAL/PF Prob Cause Item B: UNKNOWN Damage Description: CABLES DAMAGED IN ELE	Time Extinguished: Plant Description: Description Burning: Prob Cause Description: Contrib Item No:	.05 M24 CONVEYOR H/E 6.6KV ELECTRICAL CUBICLE CABLES IN CUBICLES COALDUST IN CUBICLE &ON UNKNOWN	Alarm time: 23,45 UBICLE CLE &ON WALK
now excludulsned: PIPED WAIER	Support ManHours:	1.33 Equipment Hours:	Actual Cost:	Cosmos No:
Report No: A1724 Date: 13.03.91 Location Item No: 21 ON OR NEAR ROADWAY Burning Item No: 25 COAL/PF Prob Cause Item A: 47 Prob Cause Item B: Damage Y/N: NA Damage Descrip	: 13.03.91 Time Attend: 17.50 R NEAR ROADWAY /PF Cause Item B: UNKNOWN Damage Description:	Time Extinguished: 17.80 Plant Description: LOOSE COAL Description Burning: LOOSE COAL Prob Cause Description: UNKNOWN Contrib Item No: 53 ENVIR	Time Completed: 18.00 COAL ON ROAD, LVL 2 METAL BINS COAL IGNITED ON ROADWAY WN ENVIRONMENTAL(WIND, RAIN, S/C)	Alarm time: 17.50
Ном Extinguished: PIPED WATER	Support ManHours:	Equipment Hours:	Actual Cost:	Cosmos No:
Report No: A1901 Date: 5.08.91 Location Item No: 22 VEHICLE OR MOBILE PLAN Burning Item No: 25 CQAL/PF Prob Cause Item A: 43 Prob Cause Item B: Damage Y/N: N Damage Description Contrib Factor Desc: WIRING FROM STARTER MOTOR	Date: 5.08.91 Time Attend: 12.30 VEHICLE OR MOBILE PLANT CQAL/PF Prob Cause Item B: ELECT FAULT-SHORT Damage Description: ING FROM STARTER MOTOR	Time Extinguished: 12.45 Plant Description: DOZER 1 Description Burning: LOOSE CO Prob Cause Description: WIRES FI Contrib Item No: 51 Equ	145 DOZER 11 G134 COAL CARTING AREA NO 2 LVL EAS LOOSE COAL IN BELLY PLATE & WIR'G FRM START WIRES FROM STARTER MOTOR 51 EQUIPMENT MALFUNCTION	1: 12.45 Alarm time: 12.30 S AREA NO 2 LVL EAS & WIR'G FRM START MTR
How Extinguished: 2 DRY POWDER EXTINGUISHERS		1.00 Equipment Hours:	Actual Cost:	Cosmos No:
Report No: A1927 Date: 10.09.91 Location Item No: 22 VEHICLE OR MOBILE PLAN Burning Item No: 25 COAL/PF Prob Cause Item A: 39 Prob Cause Item B: Damage P/N: N Damage Description Contrib Factor Desc: LOOSE COAL AROUND EXHAUST	Date: 10.09.91 Time Attend: 8.30 VEHICLE OR MOBILE PLANT COAL/PF Prob Cause Item 8: HOT ENGINE OR EXH Damage Description: SE COAL AROUND EXHAUST	Time Extinguished: 8.10 Plant Description: DOZER 11G135 Description Burning: COAL IN AROU Prob Gause Description: COAL ON EXHA Contrib Item No: 52 DESIGN	10 Time Completed: 8.45 DOZER 11G135 COAL IN AROUND EXHAUST COAL ON EXHAUST 52 DESIGN	Alarm time: 8.30
How Extinguished: PIPED WATER -	Support ManHours:	1.00 Equipment Hours:	Actual Cost:	Cosmos No:
Report No: A1987 Date: 9.12.91 Location Item No: 21 ON OR NEAR ROADWAY Burning Item No: 25 COAL/PF Prob Cause Item A: 37 Prob Cause Item B: Damage Y/N: N Damage Descrip Contrib Factor Desc: BURNING AND WELDING	:: 9.12.91 Time Attend: 9.25 IR NEAR ROADWAY /PF Cause Item B: HOT WORK(WELD,CUT Damage Description:	Time Extinguished: 9.55 Plant Description: 5 LEVEL SO Description Burning: LOOSE COAL Prob Cause Description: BURNING &, Contrib Item No: 49 HUMAN	55 Time Completed: 9.55 5 LEVEL SOUTH EAST CORNER LOOSE COAL BURNING & WELDING 49 HUMAN ACTION	Alarm time: 9.25
How Extinguished: MAN TANKER	Support ManHours:	1.00 Equipment Hours: .50	Actual Cost:	Cosmos No:

SECV MORWELL OPENCUT COALMINE FIRE REPORT EXTRACT (NOV.'89 to April '92.)

124d

.

Lancas and the second

11.06.92 Page 5.

RELATING TO THE WORKED OUT AREA OF THE MINE

.01.91 Time Attend: 14.35		Alarm time: 14.35
De COAL/Pr 4: 39 Prob Cause Item B: HOT ENGINE OR EXH Prob Damage Descrip≿ion: 8sc: UNIDENTIFIED VEHICLE EXHAUST		
How Extinguished: MAN TANKER Support ManHours: 2.00	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A2066 Date: 10.01.92 Time Attend: 8.10 Time E Location Item No: 21 ON OR NEAR ROADWAY Burning Item No: 25 COAL/PF Description: SPONTANEOUS COMBU Prob Cause Item B: SPONTANEOUS COMBU Prob Cause Item B: Contrib Factor Description:	Time Extinguished: 8.40 Time Completed: 8.40 Plant Description: 8 LEVEL DUMP Description Burning: LOOSE COAL Prob Cause Description: HOT SPOT IN COAL CONTRIB ITEM NO: 53 ENVIRONMENTAL(WIND,RAIN,S/C)	Alarm time: 8.10
t ManHours:	2.00 Equipment Hours: Actual Cost:	Cosmos No:
Report No: A2078 Date: 17.01.92 Time Attend: 12.00 Time E Location Item No: 21 ON OR NEAR ROADWAY Burning Item No: 25 COAL/PF Prob Cause Item A: 39 Prob Cause Item B: HOT ENGINE OR EXH Prob Cause Y/N: N Damage Y/N: N Contrib Factor Desc: SUSPECTED VOLVO DUMP TRUCK	Time Extinguished: 12.20 Time Completed: 12.20 Plant Description: 8 LEVEL DUMP Description Burning: LOOSE COAL ON DUMP Prob Cause Description: SUSPECTED VOLVO DUMP TRUC Contrib Item No: 52 DESIGN	Alarm time: 12.00
pport ManHours: 1.00	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A2088 Date: 21.01.92 Time Attend: 11.45 Time E Location Item No: 24 OTHER (SPECIFY) Burning Item No: 25 COAL/PF Prob Cause Item A: 43 Prob Cause Item B: ELECT FAULT-SHORT Prob Cause Y/N: N Damage Description:	Time Extinguished: 12.10 Plant Description: M24 CONVEYOR FUSE BOX Description Burning: LOOSE COAL ON LEVEL Prob Cause Description: FUSE BLEW Contrib Item No: 51 EQUIPMENT MALFUNCTION	Alarm time: 11.45
shed: PIPED WATER Support ManHours: 1.66	Equipment Hours: Actual Cost:	Cosmos No:
Report No: A2254 Date: 1.02.92 Time Attend: 7.50 Time E Location Item No: 21 ON OR NEAR ROADWAY Burning Item No: 25 COAL/PF Prob Cause Item A: 37 Prob Cause Item B: HOT WORK(WELD,CUT Prob Cau Cause Y/N: N Damage Description: Contrib Factor Desc: BURNING AND WELDING	Time Extinguished: 8.50 Time Completed: 8.50 Plant Description: BELOW M22 CONV. ON 4 LEVEL EAST SIDE Description Burning: LOOSE COAL AT BOTTOM OF COAL BATTER Prob Cause Description: BURNING AND WELDING Contrib Item No: 49 HUMAN ACTION	Alarm time: 7.50
How Extinguished: MAN TANKER 4.00	Equipment Hours: 1.00 Actual Cost:	Cosmos No:

RICHARD OLIVER

11.06.92 Page 6.

RELATING TO THE WORKED OUT AREA OF THE MINE

SECV MORWELL OPENCUT COALMINE FIRE REPORT EXTRACT (Nov.'89 to April '92.)

».- j

<u>.</u>

Alarm time: 17.10 Alarm time: 14.00 Alarm time: 19.20 Cosmos No: Cosmos No: Plant Description: BELOW M22 CONV. 4 LEVEL EAST SIDE Description Burning: LOOSE COAL AT BOTTOM OF COAL BATTER. Prob Cause Description: BURNING & WELDING Equipment hours required to extinguish a fire; Time Completed: 17.40 Time Completed: 18.00 Time Completed: 19.50 1.13 HOURS 5.00 HOURS .20 HOURS Plant Description: 5 level South East corner Actual Cost: Actual Cost: Actual Cost: Description Burning: LOOSE COAL UNDER PIPE Prob Cause Description: CUTTING 450 DEG. PIPE Description Burning: loose coal & grass Prob Cause Description: Burning & Welding Contrib Item No: 49 HUMAN ACTION Plant Description: 7 LEVEL EAST SIDE Contrib Item No: 49 HUMAN ACTION Contrib I tem No: 49 HUMAN ACTION Maximum Minimum Average Count 2.00 .50 .50 Time Extinguished: 17.40 Time Extinguished: 18.00 Time Extinguished: 19.50 Support ManHours: 18.00 Equipment Hours: 1.00 Equipment Hours: 1.50 Equipment Hours: Support ManHours: Manhours required to extinguish a fire; Support ManHours: 2.01 HOURS 18.00 HOURS .16 HOURS HOT WORK (WELD, CUT HOT WORK (WELD, CUT HOT WORK (WELD, CUT Time Attend: 17.10 Time Attend: 14.00 Time Attend: 19.20 28 Total No. of Fire reports for the Worked Out Area Damage Y/N: N Damage Description: Contrib Factor Desc: SPARKS FROM BURNING & WELDING Minimum Maximum Average Count Damage Description: Damage Description: Contrib Factor Desc: BURNING & WELDING SPARKS Prob Cause Item B: Date: 31.01.92 ON OR NEAR ROADWAY COAL/PF Prob Cause Item B: ON OR NEAR ROADWAY COAL/PF Prob Cause Item B: Contrib Factor Desc: CUTTING 450 DEG. PIPE ON OR NEAR ROADWAY COAL/PF Date: 5.02.92 Date: 7.02.92 SUMMARY How Extinguished: MAN TANKERS How Extinguished: MAN TANKER How Extinguished: TANKER 23 Prob Cause Item A: Prob Cause Item A: Prob Cause Item A: Location Item No: Location Item No: Location Item No: Report No: A2256 Burning Item No: Report No: A2257 Burning Item No: Burning Item No: Report No: A2260 Damage Y/N: N Damage Y/N: N

Workout.db

SECV MORWELL OPENCUT COALMINE FIRE REPORT SUMMARY (Nov.'89 to April '92)

RELATING TO THE WORKING AREA OF THE MINE

11.06.92 Page 1.

Manhours required to extinguish a fire;

Count = 419 Average = 1.77 Hours Maximum = 154.50 Hours Minimum = .05 Hours

Equipment hours required to extinguish a fire;

Average = .97 Hours Count = 101
Maximum = 23.00 Hours
Minimum = .08 Hours

Total No. of Fire reports for the Working Area

APPENDIX 5

1.100

INITIAL APPRAISAL OF LEGAL RISKS OF CHANGES TO LVOCFPP

PHILLIPS FURA

461 BOURKE STREET MELBOURNE 3000 AUSTRALIA G.P.O. BOX 4301 PP MELBOURNE 3001 AUSTRALIA TELEPHONE: NATIONAL (03) 604 5555 INTERNATIONAL +613 604 5555 TELEX: AA31931 FACSIMILE: (03) 602 3100 DX 147 MELBOURNE

OUR REF

GRM:OLIV

604 5693

004 3693

Geoff Masel

WRITER'S DIRECT LINE:

YOUR REF

4 June, 1992

Mr C Teniswood Richard Oliver International Pty Ltd Box 956G GPO MELBOURNE 3001

Dear Chris,

Initial Appraisal of Liability - Risk of Changes to SECV Morwell Fire Policy

I have considered your letter of 2 June, 1992 together with enclosures.

The State Electricity Commission of Victoria is a public authority as defined by Section 3 of the Country Fire Authority Act and it is accordingly bound by Section 43(1)(a) of that Act which provides that "it shall be the duty of.... every public authority to take all practicable steps (including burning) to prevent the occurrence of fires on and to minimise the danger of the spread of fires on or from any land vested in it or under its control or management..."

A duty cast by statute to take all practicable steps has been held to impose a stricter standard than a duty to take all reasonably practicable steps. However, the steps must be possible in the light of current knowledge and invention - Adsett v. K & L Steel Founders & Engineers Ltd (1953) 1 All ER 97; affirmed (1953) 2 All ER 320; Gregson v. Hick Hargreaves & Co Ltd (1955) 3 All ER 507. Steps are practicable if they are precautions which can be taken without

Pattoers: Konald Salter Man Kassace John Sassacon Julith Fasis Peter Kassleigh (on Sassaci William Mosennis veith Nation Mephas Nasser Michael Point Obristopios Edjuist Miles Lallech

Peter Black John Belitho Michael Cam Steven Smath Don Mazzone Pamela Worey Nave Michael Logic Smath Low Pane John Mongan Gregory Cheston Mary Anne Harlley Gay Reitwille Kichael Blach Colin Hiles Paul Duggun Noeman Abrams Ame Mager John Boland Greg Banks Christopher Charles Peter Kenns Komath Howden S. // Rosenzwerg Senior Associates: Craig Terrill Phillip Sweeney Gerard Bean Geoffrey Lev Carolon Fax Julie Armstrong John Molnar Selwyn Block Mark Burger Ray Sheely Helen O'Brien Robert Milstein Gracme Armstrad

Michael Regas Mark Huntington Jonathan Officer Paul Freeman Michael Holmes Ian Gilbert Shane Hird David Salveson Olivia Warwick Jone Rummery Graeme Halperin Sharene Hambur Consultants: William Lasica Geoffrey Musel Jaginder Singh-Pasricha Margaret Lothian Alan Norster Alan Russahy

Sydney, 255 Elizabeth Sueet Sydney 2000 Telephone: 402 i 286 8000 Facsimile; 402 i 283 4144 Telex: AA24088 DX 107
Perth; The Quadrum I William Street Perth 6000 Telephone; 409 i 324 8811 Facsimile; 409 i 324 8801 DX 130
Brisbane; 145 Eagle Street Brisbane 4000 Telephone; 407 831 5033 Facsimile; 407 839 2086 DX 289
Canberra; London Court 13 London Circuit Conberra 2001 Telephone; 407 0 201 8785 Facsimile; 406 201 8755 DX 5724
Cairus; 15 Luke Street Cairus 4870 Telephone; 4070 31 6036 Facsimile; 4070 31 5887 DX 41296
Auckland: Cur Customs & Albert Streets, Auckland, New Zealand Telephone; 4049 303 2019 Facsimile; 4049 303 2311
Wellington: Custombouse Quay, Wellington, New Zealand Telephone; 404) 472 6289 Facsimile; 404 3472 7429
Associated with:

Date:

TO: Mr Chris Tenniswood
Richard Oliver International Pty Ltd

4 June, 1992

practical difficulty - Brooks v. JMP Coats (1984) 1 All ER 702. Because of the high duty cast by a statutory obligation to take all practicable steps it is probable that questions of cost are not relevant to practicability but the test of practicability might otherwise be concerned with available resources - Adsett v. K & L Steel Founders & Engineers Ltd (supra).

It is further provided by Section 47 of the Country Fire Authority Act 1958 that the provisions of sections, including Section 43, "shall be read and construed as in aid of and not in derogation from the provisions of any other Act or law relating to fires or to the careless negligent or criminal use of fire."

There are no relevant specific provisions in the State Electricity Commission Act 1958. Section 43 must not be read in derogation from the common law of negligence casting a duty of care on public authorities to prevent the occurrence of fires and to minimise the danger of the spread of fires on or from any land vested in it or under its control or management. However, the common law duty of care is only to take all reasonably practicable steps and accordingly Section 43 of the Country Fire Authority Act imposes a more stringent obligation. It is the more stringent obligation which must be complied with in respect of any changes to the SECV Morwell fire policy.

In this context it is necessary to consider whether it is practicable to retain Sections 1.04 and 1.05 of the SECV Latrobe Valley Fire Protection Policy for worked out areas and batters. To determine the issue of practicality your analysis will have to determine whether it has been practical in the above sense to apply the policy to worked out areas and batters in the past and, if not, what are the minimum amendments necessary to enable the formulation of a policy which is practicable in the sense that it can be carried out without practical difficulty. If your analysis shows that Sections 1.04 and 1.05 of the policy have been successfully applied in the past to worked out areas and batters this probably proves that the application of the policy to these areas is practicable, even if it may not be reasonably practicable.

In the result, any amendment of the Policy to reduce the stringency of precautions has a potential for an increase in liability for the SECV. This is not to say that such increase in liability may in fact eventuate as legal liability ultimately will depend, not only on the existence of a duty and breach of the duty, but proof of causation of loss by breach of the duty. Your appraisal may well show that the risk of loss caused by amendment of Sections 1.04 and 1.05 in respect to worked out areas and batters is minimal. Nevertheless, even if a fire was not caused by a breach of the duty, evidence of breach of the duty will undoubtedly be undesirable because of its effect on the public and political profile of the SECV.

It does not seem to me that the principles to be applied in determining practicability will vary between an option of exempting worked out areas and batters from Section 1.04 and 1.05 as distinct from an option of modification of the sections.

Continuation sheet no:

·PHILLIPS FOX.

3

Date:

TO: Mr Chris Tenniswood
Richard Oliver International Pty Ltd

51/11/

4 June, 1992

It may be that a risk analysis would show that it has not been practicable to apply Sections 1.04 and 1.05 to worked out areas and batters in the past but if it is practicable to modify the policy that will carry less risk of breach of the legal obligation than an outright exemption from the policy.

I hope this initial appraisal assists you in the drafting of your report. I would be glad to discuss any aspect of it with you at your convenience.

Yours faithfully,

GEOFF MASEL

lcb/wpdly9/9104.4

RICHARD OLIVER

2nd June, 1992

Mr Geoff Masel Phillips Fox, Solicitors 461 Bourke Street MELBOURNE, VIC 3001



Dear Geoff,

RE: INITIAL APPRAISAL OF LIABILITY/RISK OF CHANGES TO SECV MORWELL FIRE POLICY

Thank you for your time spent in discussion of this matter. I am very pleased that you can examine the issues and provide an initial appraisal to me by June 11. I am required to submit a draft report on June 12.

The circumstances are this. Morwell Open Cut wants an exemption from the SECV Latrobe Valley Fire Protection Policy, sections 1.1.4 and 1.1.5, for its "worked out" areas and "batters". We are carrying out a risk analysis to see if such exemption is justifiable.

However, the CFA Act (section 43) requires SECV to take steps to prevent and suppress fires. I also understand that the SECV's own Act makes reference(s) to fire mitigation.

Moreover, SECV has a high public and political profile where fire, especially bushfire, is concerned. A fire at Yallourn Open Cut led to a Royal Commission in 1944. A fire at Morwell Open Cut in 1977 was the foundation for the Latrobe Valley Fire Protection Policy (revised in 1984).

Against this background and under these circumstances, I am therefore interested in your views on the increased liability and/or risk of exemption from part of SECV policy, from a legal perspective. Secondly, if a modification (rather than exemption) to the policy with regard to worked-out areas and batters was to be made, what would the key issues be in developing any modification?

I attach a copy of the SECV policy, and also the Royal Commission and Morwell fire reports as general information should you require.

.../2

RICHARD OLIVER INTERNATIONAL PTY. LTD.

A.C.N. 006 256 908

71 Queens Road, Melbourne 3004, Australia
Telephone: (03) 529 5122 Toll Free: 008 335 014 Fax: (03) 521 1634

Correspondence to: Box 956G, GPO Melbourne 3001



-2

I appreciate your assistance, Geoff and look forward to your report.

Yours sincerely,

CHRIS TENISWOOD

encl/-

CT\SECV\PHILFOX.LTR:mg