



**INDEPENDENT
ENVIRONMENTAL AUDIT
REPORT**



20 Friendship Road (Site B1, B2, and B3) and 37
Friendship Road (Site B4A) Port Botany, NSW 2036

Vopak Terminals Sydney Pty Ltd
21 November 2024

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This report was prepared in accordance with the scope of services set out in the contract between Geosyntec Consultants Pty Ltd (ABN 23 154 745 525) and the client.

Executive Summary

Geosyntec Consultants Pty Ltd (Geosyntec) was engaged by Vopak Terminals Sydney Pty Ltd (Vopak) to conduct an Operational Independent Environmental Audit (IEA) of the sites, located on Terminal B1 to B3 and B4A, 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The development is also referred to as Vopak Terminals.

The boundary of the sites covered by this IEA are provided in Appendix A.

This audit is the operational IEA of the terminal B1 to B4A. The purpose of the IEA is to provide an independent and objective assessment of the environmental performance and compliance of the operational phase of the approved development at the site.

The overall objective of the Audit is to confirm compliance with two development approvals:

- Conditions 4, 4A, 5 and 6 of Schedule 2 of MP 06_0089 Mod2 (27 December 2018) for B1 to B3 Site
- Conditions C11 and C12 of SSD 7000 approval (23 November 2016) for B4A Site

The IEA was conducted in accordance with the NSW Government (May 2020) Independent Audit Post Approval Requirements as Vopak has elected to audit under the IAPAR (2020), as per NSW Planning's PAR advisory letter (attached in Appendix G). The site inspection was conducted on 16 September 2024.

A total of 117 items were assessed as part of MP06_0089 consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 49 items
- Number of non-compliances = 5 items
- Number of non-triggered = 63 items

A total of 55 items were assessed as part of SSD 7000 consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 32 items
- Number of non-compliances = 8 items
- Number of non-triggered = 15 items

An assessment of 135 items with regard to the implementation and compliance with the site's EPL and OEMPs (operational environmental management plans) was conducted. A summary of the findings is provided as follows:

- Number of compliances = 126 items
- Number of non-compliances = 2 items
- Number of non-triggered = 7 items

In addition, assessment of 32 items with regard to the implementation the mitigation measures provided in OEMP Appendix B (i.e. the OEMP Table) was conducted. A summary of the findings is provided as follows:

- Number of compliances = 19 items
- Number of non-compliances = 0 item
- Number of non-triggered = 13 items

A discussion of IEA findings is presented in this document. The Auditor also provides recommendations on opportunities for improvement.

Table of Contents

1	Introduction	7
2	Audit Methodology	11
3	Audit Findings	13
4	Recommendations and Opportunities for Improvements	34
5	Limitations	36

Appendices

Appendix A	Figures
Appendix B	Auditor Declaration
Appendix C	Correspondence
Appendix D	Record of Meeting and Agenda
Appendix E	Photographs
Appendix F	Audit Table
Appendix G	NSW Planning's PAR Advisory Letter

Glossary

Term	Description
Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (ISO 19011:2018). For the purpose of this report, Audit refers to an Independent Environmental Audit in accordance with the NSW Government (May 2020) Independent Audit Post Approval Requirements
Audit criteria	Set of requirements used as a reference against which objective evidence is compared.
Audit evidence	Records, statements of fact or other information which are relevant to the audit criteria and verifiable.
Audit findings	Results of the evaluation of the collected audit evidence against audit criteria.
Audit conclusion	Outcome of an Audit after consideration of the Audit objectives and all audit findings.
Auditee	Organisation being audited.
Audit Program	Audit Schedule and Audit Table as defined in NSW Government (June 2020) prepared by Geosyntec prior to the commencement of the Audit.
Auditor	Person(s) who conduct(s) the Audit, as defined in this report. Lead Auditor and Auditor in Training
Audit Team	One or more persons conducting the Audit, supported if needed by technical experts.
Authorised Reporting Officer	A director, executive, employee or office of the proponent who is authorised by the proponent to submit formal reporting on the proponent's behalf.
Competence	Ability to apply knowledge and skills to achieve intended results.
Compliant	The Auditor has obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
CSSI	Critical State Significant Infrastructure
DoEE	The Commonwealth Department of the Environment and Energy administering the EPBC Act, and includes the Minister for the DoEE
DP&E	NSW Department of Planning and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure (previously DP&E and DPIE)
DPIE	NSW Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of Construction, who will be the principal point of advice in relation to all questions and complaints concerning environmental performance.
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPL	NSW Environment Protection Licence under the Protection of the Environment Operations Act 1997
Federal CoA	Federal DoEE Condition of Approval
Incident	An occurrence or set of circumstances that causes, or threatens to cause material harm and which may or may not be or cause a non-compliance.
Minister	Minister of DPHI or delegate.
NSW CoA	NSW DPHI Condition of Approval
Non-compliant	The Auditor has not obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
Not triggered	The specific item has not been activated at the time of the Audit and therefore, the Audit was not completed for the item.

Term	Description
Planning Secretary	The Planning secretary under the EP&A Act or nominee.
PoEO Act	NSW Protection of the Environment Operations Act 1997
Post approval document	A document required by conditions of consent, including Environmental Management Plans and Sub-plans.
Predicted impact	Predicted impacts described in the Environmental Impact Assessment documents that comprise the approved project (if available).
Project	As per definition in Section 1
Proponent	The person or entity that is referred to as the proponent in an approval or the applicant in a consent or any other person carrying out any part of the development to which the approval or consent applies.
Risk	Effect of uncertainty.
Site	As per definition in Section 1
State significant projects	Means any of the following in accordance with the EP&A Act: <ul style="list-style-type: none"> • State significant development projects • State significant infrastructure projects, including critical State significant infrastructure projects • Transitional Part 3A projects • Part 4 projects for which the Minister is the consent authority

1 Introduction

Geosyntec Consultants Pty Ltd (Geosyntec) was engaged by Vopak Terminals Sydney Pty Ltd (Vopak) to conduct an Operational Independent Environmental Audit (IEA) of the sites, located on Terminal B1 to B3 and B4A, 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The development is also referred to as Vopak Terminals.

1.1 Background

The audit was completed on two areas operated by Vopak:

- Terminal B1 to B3 facilities located at 20 Friendship Road, Port Botany (B1-B3 Site)
- Terminal B4a facility located at 37 Friendship Road, Port Botany (B4A Site)

The boundary of the B1-B3 Site and B4 Site is provided in Appendix A.

B1 to B3 Site is subject to Major Project (MP) 06_0089 Mod 2 dated 27 December 2018, noting that expansion in Mod 2 has not been completed yet.

B4 Site is subject to State Significant Development (SSD) 7000 dated 23 November 2016, but only construction of B4A has been completed.

B1 to B3 Site and B4A Site operate 24 hours a day, 7 days a week as a hydrocarbon fuel import, storage, and export facility. Hydrocarbon fuels in B1 to B3 terminals are imported and exported from Bulk Liquids Berth 1 (BLB1), Bulk Liquids Berth 2 (BLB2), road tanker, and via a bi-directional pipeline connected to Caltex Banksmeadow within the multi-user pipeline corridor.

Site B4A is an un-manned site which consists of three storage tanks of total 105,000 m³. Operation, management and maintenance are conducted by the team located at B1 to B3 site. The bulk liquid fuels in B4A Site are imported and exported via pipelines between B1 to B4A only (under Friendship Road) and are not transported by road vehicles. It is also noted that the operation for B1-B3 Site and B4A Site is managed under a combined operational environmental management plan (OEMP).

An Independent Environmental Audit is required every three years as stipulated in the MP 06_0089 (Schedule 4, Item 4) and SSD 7000 (Condition C11). Previously, the Audits for B1 to B3 Site and B4A Site were conducted at different times. The last IEA Audits for each consent condition were as follows:

- Geosyntec (28 July 2023), Independent Environmental Audit Report, 20 Friendship Road (Site B1, B2, and B3), Port Botany, NSW 2036 (Ref: AU122221 R1).
- Geosyntec (3 May 2022), Independent Environmental Audit Report, Site B4A, 37 Friendship Road, Port Botany, NSW 2036. (Ref: 21292 R1).

The current IEA were conducted concurrently for B1 to B3 and B4A Sites, with the aim to conduct similar audits into the future. The findings of the Audit for B1-B3 Site and B4A Site are reported separately in Section 3, Section 4, and Appendix F.

All B1 to B3 Site and B4A Site were also audited against the site OEMP and sub-plans mitigation measures.

1.2 Audit Team

The Audit team comprised the following Geosyntec personnel:

Table 1.1. Audit Team

Name	Role
Dr Cheryl Halim	Lead Auditor <ul style="list-style-type: none"> Exemplar Global AU (ISO 19011:2018) (No. C-464022) NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 2201) BE (Chemical) PhD (Chemical Engineering)
Lia Young	Support Auditor <ul style="list-style-type: none"> BE (Chemical) PhD (Chemical Engineering)

The Audit Team Declaration is provided in Appendix B.

1.3 Purpose and Objective of Audit

The purpose of the IEA is to provide an independent and objective assessment of the environmental performance and compliance status of the operational phase of the approved development. This audit is completed within 3 years of the previous Audits.

The overall objective of the Audit is to confirm compliance with Independent Environmental Audit Conditions 4, 4A, 5 and 6 of Schedule 2 of MP 06_0089 Mod2 (27 December 2018) for B1 to B3 Site, and Conditions C11 and C12 of SSD 7000 approval (23 November 2016) for B4A Site.

Conditions 4, 4A, 5 and 6 of Schedule 2 of MP 06_0089 Mod2 (27 December 2018) applicable to B1 to B3 Site:

4	Within 12 months of the approval of MOD 2, and every three (3) years thereafter, unless the Planning Secretary directs otherwise, the Proponent must carry out an Independent Audit of the project in accordance the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).
4A	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: <ul style="list-style-type: none"> a) review and respond to each Independent Audit Report prepared under condition 4 of this approval; b) submit the response to the Department; and c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least 7 days before this is done. <p>Note: Information deemed commercially sensitive or confidential by the Proponent does not need to be made publicly available.</p>
5	Within 2 months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Proponent must submit a copy of the audit report to the Planning Secretary, with a response to any recommendations contained in the audit report.
6	Following each Independent Environmental Audit, the Proponent must review and if necessary revise the Environmental Management Plan (and any other plans/strategies/programs required under this approval) to the satisfaction of the Planning Secretary. The revised plans/strategies/programs must be submitted to the Planning Secretary within 3 months of submitting the audit report.

Conditions C11 and C12 of SSD 7000 approval (23 November 2016) applicable to B4A Site:

	<p>Within 2 years of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must:</p> <p>(a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under this consent.</p> <p>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</p>
C12	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>

This Independent Environment Audit was conducted in accordance with the requirements of the NSW Government (May 2020) Independent Audit Post Approval Requirements (IAPAR) as Vopak has elected to audit under the IAPAR (2020), in accordance with the NSW Planning's Post Approval Requirements advisory letter (attached in Appendix G).

1.4 Audit Scope

1.4.1 Audit Scope (Physical and Temporal Boundaries)

The physical and temporal boundaries of the current IEA are as follows:

- Physical boundary:
 - Site B1 to B3 is approximately 8.9Ha and located within Lot 10 DP 1126332 and Lot 21 DP 1045324 (previously known as Lot 1 DP 806558, Lot 21 DP 1045323).
 - Site B4A is approximately 23,500m² and located within Lot 20 DP1272410 (formerly Lot 201 in DP1210638).

The physical boundary of this Audit is shown in the site plan included in Appendix A. The sites are currently an operational facility.

- Temporal boundary of the audit is for the duration of the operational phase of the Vopak Terminal B1, B2, B3, and B4A. It is further noted that Vopak states that the site expansion under MOD2 for Site B1 to B3 has not commenced, and is hence, excluded from this audit.

A hazard and safety audit of site operations will be completed by another party and is outside the scope of this audit.

1.4.2 Audit Criteria (Audit Works)

The Audit criteria are identified by the conditions MP 06_0089 Mod2 (27 December 2018) for B1 to B3 Site and SSD 7000 (23 November 2016) for B4A Site, and the requirements outlined in the NSW Government (May 2020) Independent Audit Post Approval Requirements for all sites.

The Audit Table (Appendix F) presents the requirements to be evaluated during the Audit, which includes:

- An assessment of compliance with the Conditions of Consent and other relevant approvals and licences
- An assessment of environmental performance of the operational site, including:
 - Assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (EIS) and Environmental Assessment (EA) documents.
 - Assessment of any incidents, non-compliances and complaints that have occurred on the project.
 - Assessment of any feedback received by DPHI, other agencies and stakeholders (as appropriate)
 - Assessment of performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the Audit scope.
 - The site EPL No. 6007.
 - A high-level assessment of the adequacy of the Site's operational environmental management plan (OEMP), sub plans, and their implementation.

1.5 Audit Period

The Audit covers the review of environmental documentation and records for site activities from last site inspection (which is 29 March 2022 for B4A Site and 20 February 2023 for B1 to B3 Site) to the current audit site inspection (16 September 2024). Additional information provided prior to the issue of the Audit report was also considered.

Both IEAs are completed within the 3 years from the previous Audit, which is consistent with the requirements of the SSD 7000, MP06_0089, and IAPAR 2020.

1.6 Environmental Representative

Avishek Biswas from Vopak Terminals Australia Pty Ltd was the appointed Environmental Representative, who assisted Geosyntec during this Audit process.

Trent Martin and John Sun from Vopak Terminals Australia Pty Ltd also assisted Geosyntec.

2 Audit Methodology

2.1 Auditor Notification to DPHI

The Environmental Audit team was approved by DPHI in a letter dated 6 September 2024. The correspondence is attached in Appendix C.

2.2 Site Audit Process

The Audit comprised:

1. Opening meeting
2. Compliance to Audit Program
3. Review of evidence of consultation with identified stakeholders
4. Closing meeting
5. Issue of Draft Independent Environment Audit report
6. Review of additional information (if any)
7. Finalisation of Independent Environment Audit report

2.2.1 Opening Meeting

The opening meeting was conducted onsite on 16 September 2024. The agenda for the meeting and the record of attendees is provided in Appendix D.

2.2.2 Sources of Information to Assess Compliance to Audit Program

Sources of information reviewed to assess compliance to the audit program included:

- Review of project records, documentation and reports.
- Interview with key project personnel (available during site inspection) and post site inspection follow up.
- Site walkover and inspection for implementation of environmental controls.
- Review of complaints registers for the project.

2.2.3 Closing Meeting

The closing meeting was held on 1 October 2024. It was agreed that the closing meeting could be conducted via email correspondence from Geosyntec, which provided an overview of key findings and timing for the Audit Report. The closing meeting email provided preliminary findings of the Audit.

2.2.4 Issue of Independent Environment Audit Report

The Draft Independent Environmental Audit Report was issued on 11 November 2024.

2.2.5 Finalisation of Independent Environment Audit Report

The IEA report was finalised on 21 November 2024. Changes made after the issue of the Draft report are listed as follows:

- SSD 7000 Condition B8 for Site B4A (Geosyntec ID: G137): The item status was updated from non-compliant to compliant as the Hazard Audit for Site B1-3 was previously thought to include Site B4A. The Condition is now considered compliant as the Hazard Audit for Site B4A was conducted on 30 November 2022 and the next hazard audit for B4A is not required until 30 November 2025.
- Water Management Plan Section 6.1 (Inspection) (Geosyntec ID: G296): The item status was updated from non-compliant to compliant following provision of evidence of site inspection.
- Water Management Plan Section 6.4 (Disposal of Waste) (Geosyntec ID: G307): The item status was updated from non-compliant to compliant following provision of Cleanaway waste tracking forms.

2.3 Interviews

Interviews with the project personnel conducted on 16 September 2024. The following personnel were interviewed:

- Avishek Biswas (Vopak Terminals Australia Pty. Ltd. – SHEQ Manager)
- Trent Martin (Vopak Terminals Australia Pty. Ltd. – Terminal Manager) and
- John Sun (Vopak Terminals Australia Pty. Ltd. – Maintenance Planner)

2.4 Site Inspection

The site inspection was conducted by Cheryl Halim on 16 September 2024, accompanied by the Terminal Manager (Trent Martin). The site inspection comprised a walkover of the site footprint, including the perimeter of the site.

2.5 Consultation

Geosyntec conducted consultation with DPHI, Randwick Council (Council), EPA, and NSW Port via email. Evidence of consultation is provided in Appendix C.

The outcome of the consultation is provided in Section 3.8.

2.6 Compliance Status Descriptors

The findings of the Audit have been divided into the following categories:

Table 2.1. Compliance Evaluation

Assessment	Criteria
Compliant	Sufficient verifiable evidence is available to demonstrate that all elements of the requirement have been met
Non-Compliant	One or more specific elements of the conditions or requirements have not been met
Not-Triggered	A requirement has an activation of timing trigger that has not been met at the time of the audit, therefore compliance is not relevant. Items not considered for Independent Environment Audit have also been recorded as "Non-Triggered."

3 Audit Findings

3.1 Approvals and Documents Audited

The following documents were audited:

Table 3.1. Audited Documents

MP Reference	Document Details
Environmental Assessment (EA)	Vopak (February 2007) Major Project Assessment: Vopak Stage B3 Facility Expansion, Port Botany. Vopak (23 November 2016) Section 75 W Modification MP 06_0089 - Modification 2. This EA is only for Mod 2 and the expansion in Mod 2 has not been completed yet. Therefore, only applicable conditions have been considered in this audit.
MP06_0089 Mod0 and Mod2 Development Consent	MP06_0089 Mod0 (28 February 2007) and Mod2 (27 December 2018).
Schedule 3- 14C Operational Traffic Management Plan	Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A Appendix E (Traffic Management Plan).
Schedule 3- 27D Operational Air Quality Management Plan	EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan.
Schedule 4- 1E Environmental Management Plan Requirement	Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A.
Appendix 2. General Management Plans	Vopak (27 August 2021) Waste Management Plan Vopak Sydney Rev 6, noting that the document cover page stated that the document is reviewed and published on 9 November 2021.
SSD Reference	Document Details
Environmental Impact Statement (EIS)	AECOM (09 October 2015) Vopak Site B4 Project, State Significant Development – Environmental Impact Statement.
SSD 7000 Development Consent	SSD 7000 dated 23 November 2016.
B14 and C5 Operational Air Quality Management Plan	EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan.
B27 Water Management Plan	Vopak (23 June 2021) Water Management Plan (WMP) Vopak Site B4A.
C4 Operational Environmental Management Plan	Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A.
C5 Soil, Water and Waste Management	Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A. Vopak (27 August 2021) Waste Management Plan Vopak Sydney Rev 6, noting that the document cover page stated that the document is reviewed and published on 9 November 2021.
Other	
EPL for the site	Environmental protection licence No.6007

Other supporting documents reviewed are provided in the Audit Table in Appendix F.

3.2 Summary of Assessment of Compliance

A total of 117 items were assessed as part of MP06_0089 consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 49 items
- Number of non-compliances = 5 items
- Number of non-triggered = 63 items

A total of 55 items were assessed as part of SSD 7000 consent conditions. A summary of the findings is provided as follows:

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An assessment of 135 items with regard to the implementation and compliance with the site's EPL and OEMPs (operational environmental management plans) was conducted. A summary of the findings is provided as follows:

- Number of compliances = 126 items
- Number of non-compliances = 2 items
- Number of non-triggered = 7 items

In addition, assessment of 32 items with regard to the implementation the mitigation measures provided in OEMP Appendix B (i.e. the OEMP Table) were conducted. A summary of the findings is provided as follows:

- Number of compliances = 19 items
- Number of non-compliances = 0 item
- Number of non-triggered = 13 items

3.3 Agency Notices, Orders, Penalty Notices or Prosecutions During Audit Period

Vopak confirmed that no agency notices, orders, penalty notices or prosecutions received during the Audit period.

3.4 Discussion of Non-Compliances

The following tables provide details of the non-compliances:

- Table 3.2 for MP06_0089 consent conditions (B1 to B3 Site)
- Table 3.3 for SSD7000 (B4A Site)
- Table 3.4 for EPL and Subplans

Table 3.2. Non-Compliances to MP06_0089 Consent Conditions (B1 to B3 Site)

Geosyntec ID	Document	MP Condition No.	Requirement	Details of Non-Compliance	Recommendations
G34	MP06_0089 Mod2	Schedule 3-9G Within three (3) months of receiving the final audit report, or as otherwise agreed by Planning Secretary, a copy of the report must be submitted to the Planning Secretary. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented. This audit report must also be submitted to SafeWork NSW.	This condition is considered non-compliant as evidence of submission of the Hazard Audit report to SafeWork NSW was unable to be sighted.	Hazard audit report must also be submitted to SafeWork NSW.
G47	MP06_0089 Mod2	Schedule 3- 17	During the life of the project, the Proponent must ensure that stormwater discharges comply with the requirements of any EPL for the site. There must be no discharge of water direct to Botany Bay through the bund wall. Non-contaminated water must be pumped by separate key start pump to the stormwater discharge.	<p>This condition is considered as non-compliant because there were exceedances to the EPL during this Audit period as reported in the Annual returns.</p> <p>The Auditor notes that the following result did not meet EPL requirements but was not reported in the annual return:</p> <ul style="list-style-type: none"> Oil & grease (12mg/L) exceedance in Lab report 303913 (sample date 24/08/2022) was not reported on 1 July 2022 to 30 June 2023 annual return. 	All exceedances to EPL should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.
G77	MP06_0089 Mod2	Schedule 4- 5	Within 2 months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Proponent must submit a copy of the audit report to the Planning Secretary, with a response to any recommendations contained in the audit report.	This condition is considered non-compliant because the Audit is not completed within 2 months of commissioning of the audit, noting that there is inconsistency with the SSD 7000, which requires submission of audit report within 3 months instead of 2 months.	As the Audit under MP06_0089 is conducted concurrently with the Audit under SSD7000, approval from the Planning Secretary should be sought to allow the same report submission time as the SSD7000 requirement for future audits.
G78	MP06_0089 Mod2	Schedule 4- 6	Following each Independent Environmental Audit, the Proponent must review and if necessary revise the Environmental Management Plan (and any other plans/strategies/programs	This condition is considered non-compliant as there was no evidence of OEMP review following the last 2023 IEA.	After this Independent Environmental Audit, Vopak must review and if necessary, revise plans/strategies/programs required under this approval. Any revised plan/strategies/programs must be submitted

Geosyntec ID	Document	MP Condition No.	Requirement	Details of Non-Compliance	Recommendations
			required under this approval) to the satisfaction of the Planning Secretary. The revised plans/strategies/programs must be submitted to the Planning Secretary within 3 months of submitting the audit report.		to the Planning Secretary within 3 months of submitting the audit report.
G83	MP06_0089 Mod2	Schedule 4- 8	Within 12 months of the approval of MOD 2, and in the same month each subsequent year (or such other timing as may be agreed by the Planning Secretary), Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	This condition is considered as non-compliant because Compliance reporting was not carried out in accordance with the Compliance Reporting Post Approval Requirements every year following the approval of MP06-0089 Mod2.	Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DPHI).

Table 3.3. Non-Compliances to SSD7000 Consent Conditions (B4A Site)

Geosyntec ID	Document	SSD Condition No.	Requirement	Details of Non-Compliance	Recommendations
G134	SSD7000	B5(a)	The Applicant shall develop and implement the plans and systems set out under subsections (a) to (b) of this Condition. No later than two months prior to the commencement of commissioning of the Development, or within such further period as the Secretary may agree, the Applicant shall submit, for the approval of the Secretary, documentation describing those plans and systems....	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation from the previous audit requiring approval of Emergency Plan from Planning Secretary. This item has been considered as compliant as the plan has been submitted to DPIE in 2021, but evidence of approval has not been obtained.	The approval for the Emergency Plan should be obtained from the Planning Secretary, if it has not been obtained.
G143	SSD7000	B14(a)	Prior to the commencement of operation, the Applicant shall prepare an Air Quality Management Plan (AQMP) for the Development, to the satisfaction of the Secretary. The AQMP shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C7 and any other	This condition has been considered non-compliant from the last audit because, evidence of submission of the OEMP that includes the EMM Air Quality Management Plan was unable to be sighted.	If not yet obtained, approval from the Secretary on the AQMP should be obtained. Considering there have been some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval.

Geosyntec ID	Document	SSD Condition No.	Requirement	Details of Non-Compliance	Recommendations
			requirements of the EPL for the site. The AQMP shall: (a) be prepared in consultation with the EPA.		
G144	SSD7000	B15(a)	Within six months of the commencement of operation, the Applicant shall prepare a post-commissioning air emissions report to verify all major emission sources identified in the RTS associated with the development. The report shall: (a) be prepared by a suitably qualified and independent expert	This condition is considered non-compliant as the post-commissioning air emissions report was unable to be sighted during the current and previous audit.	If not already conducted, Vopak should conduct a post-commissioning air emissions report as per the Condition B15. Evidence of this will need to be sighted in subsequent audit.
G145	SSD7000	B16(a)	The Applicant shall ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2;	This item has been considered as non-compliant since the previous audit due to absence of evidence that shows internal roads, driveways and parking are constructed and maintained in accordance with the latest versions of AS 2890.1 & AS 2890.2 and the sweep path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS.	If not yet obtained, a certificate for compliance must be obtained from a suitably qualified consultant to demonstrate that internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2
G156	SSD7000	B27	Prior to commencement of operation, the Applicant shall prepare a Water Management Plan (WMP) to the satisfaction of the Secretary.....	This condition is considered as non-compliant since the previous audit as evidence of OEMP and sub-plans submission to DPPI and their approval was unable to be sighted. It is noted that Planning Secretary provided a new due date for submission (31 October 2024).	If not yet obtained, approval from the Secretary on the Water Management Plan should be obtained. Considering there are some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval.
G163	SSD7000	C4	The Applicant shall prepare an Operational Environmental Management Plan (OEMP) for the Development to the satisfaction of the Secretary. The Plan shall: (a) be approved by the Secretary prior to the commencement of operation	This condition is considered non-compliant because the approval of OEMP was unable to be sighted.	OEMP approval should be obtained to meet Condition C4 of SSD consent.
G167	SSD7000	C8	"Within 3 months of..." "(b) an audit submitted under Condition C11"..." the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent."	This item is considered non-compliant as no evidence of OEMP review was able to be sighted within 3 months of the previous IEA.	The OEMP must be reviewed and revised (if required) within 3 months of a modification of development consent or an incident report.

Geosyntec ID	Document	SSD Condition No.	Requirement	Details of Non-Compliance	Recommendations
G169	SSD7000	C10	"The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent."	This item is considered non-compliant as the 2024 groundwater monitoring reports is not accessible via the project website at the time of the audit.	Applicable environmental performance reports such as groundwater monitoring reports shall be provided on Vopak Sydney website and kept up to date.
G171	SSD7000	C12	"Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report."	The item was considered non-compliant as the previous audit report for Site B4A was not issued within 3 months of commissioning of the audit.	No recommendation made as report has been submitted after the 3 months period had passed.

Table 3.4. Non-Compliances to EPL and Plans (OEMP and sub-plans)

Geosyntec ID	Document	Condition No. or Section	Requirement	Details of Non-Compliance	Recommendations
G188	EP licence 6007 - 24 August 2021	L3.6 3. Limit Conditions. L3 Concentration limits	Water and/or Land Concentration Limits Point 2, 10, 16	<p>This condition is considered as non-compliant because there were exceedances to the EPL during this Audit period as reported in the Annual returns.</p> <p>The Auditor notes that the following results did not meet EPL requirements but was not reported in the annual return:</p> <ul style="list-style-type: none"> Oil & grease (12mg/L) exceedance in Lab report 303913 (sample date 24/08/2022) was not reported on 1 July 2022 to 30 June 2023 annual return. 	<p>All exceedances to EPL should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.</p> <p>The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.</p>

Pollutant	Units of Measure	100 percentile concentration limit
BOD	milligrams per litre	20
Oil and Grease	milligrams per litre	10
pH	pH	6.5-8.5
Total suspended solids	milligrams per litre	30

3.5 Assessment from Previous Audits

Details of the recommendations from the previous audit and how they were addressed are provided in Table 3.5 (for MP06_889) and Table 3.6 (for SSD7000) below.

Table 3.5 Assessment of Previous Audits under MP06_0889 Consent Conditions (site B1 to B3)

Recommendation from Previous Audit (28 July 2023) for B1 to B3 Site, for MP06_0889	How The Recommendations Have Been Addressed	Auditor's Assessment
<p>The following updates are to be conducted on the OEMP and subplans:</p> <ul style="list-style-type: none"> • The OEMP is finalised. • Approval for OEMP and subplans from DPHI is obtained. • Slop volume should be reported in Annual Return or the requirement for recording of slop volume in Annual Return is removed from the OEMP. 	<p>Evidence of approval of OEMP and its subplans by DPHI was unable to be sighted during the current audit.</p> <p>Geosyntec noted from the OEMP change register that the OEMP has been revised on 17 August 2022 and September 2024.</p> <p>Table 5.1 of the OEMP still requires slop volume be reported in Annual Return.</p>	<p>The Auditor considers this item has not been addressed.</p> <p>Recommendations:</p> <p>An updated OEMP with all appendices (sub-plans) should be finalised and provided to DPHI under both MP06_0889 as well as SSD 7000 for approval.</p> <p>The requirement for slop recording in the OEMP should be reviewed to be consistent with Annual Return requirement.</p>
<p>A leak detection survey should be regularly completed to determine potential leaks from tanks and pipelines. Where leaks are identified, rectification must be conducted.</p>	<p>NPI for 2022 to 2023 includes fugitives air emission for B1 to B4A sites. From the information provided by Vopak, NPI for 2023 to 2024 are to be prepared.</p>	<p>The Auditor considers this item has been adequately addressed</p>
<p>Vopak should discuss with DPHI if they would like to be notified on exceedances of stormwater discharge limits, as this forms a non-compliance of EPL.</p>	<p>The EPL Annual Return 2023-2024 shows no exceedance to EPL stormwater discharge limits. The compliance was achieved via improved project management for ad-hoc projects.</p> <p>Exceedances recorded in previous audit in 2023 were inspected, discussed, and closed with DPHI on 21 September 2024.</p>	<p>Recommendation:</p> <p>Future exceedances above the stormwater discharge limits should be notified to DPHI, unless otherwise agreed with DPHI,</p>
<p>DPHI must be informed of any feedback provided by NSW EPA, particularly with regards with exceedances in stormwater discharge. The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.</p>	<p>Exceedances recorded in previous audit in 2023 were inspected, discussed, and closed with DPHI on 21 September 2024.</p>	<p>The Auditor considers this item has been partially addressed.</p> <p>Recommendation:</p> <p>The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.</p> <p>Given that EPA has agreed that discharge point 16 does not require sampling, Vopak should consider amendment of the EPL to remove sampling requirement from discharge point 16.</p>
<p>Vopak should finalise the Vopak Vapour Recovery Unit Performance Test within 6 months of MOD 2 approval and submit that to the Planning Secretary and EPA.</p>	<p>The draft report that needs to be finalised has now been replaced with six-monthly Vapour Recovery Unit Assessment by Ektimo. Reports dated November 2022, June 2023, November 2023, and May 2024 were sighted and the concentration reported were all below the requirement stipulated in Schedule 3- 27B of MP06_0089.</p>	<p>The Auditor considers that the six-monthly Vapour Recovery Unit Assessments conducted onsite are adequate to address the initial recommendation.</p>

Recommendation from Previous Audit (28 July 2023) for B1 to B3 Site, for MP06_0889	How The Recommendations Have Been Addressed	Auditor's Assessment
The next audit must be conducted within 3 years of current audit (20 February 2023).	The Audit for B1 to B3 and B4A are now conducted together and are conducted before the earlier IEA due date for the B4A Site.	The Auditor considers this item has been adequately addressed.
Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DP&E).	Compliance reporting has not been conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018)	The Auditor considers this item has not been addressed. Recommendation: Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DP&E).
Vapour recovery unit monitoring must be conducted in accordance with the timing/frequency detailed in item G149 of the Audit Table (now listed as G204)	Ektimo (November 2022, June 2023, November 2023, May 2024) Vapour Recovery Unit Hydrocarbon Recovery Assessment were sighted.	The Auditor considers this item has been adequately addressed.
The volume of liquids discharged to water or solids or liquids applied to the area must be provided in a subsequent audit. Incident reporting must continue to be reported in accordance with the Incident Investigation and Reporting Procedure provided in the OEMP. Incidents leading to potential water contamination are to be reported to NSW Ports, as well as EPA.	A calculation on how much volume is likely to be discharged based on rainfall and the volume from bunds were unable to be sighted. No incident was reported to date that was considered to require notification to NSW Ports and NSW EPA.	The Auditor considers this item has not been addressed. Recommendations: The volume of liquids discharged to water or solids or liquids applied to area must be provided in subsequent audit. Incident reporting must continue to be reported in accordance with the Incident Investigation and Reporting Procedure provided in the OEMP. Incidents leading to potential water contamination are to be reported to NSW Ports, as well as EPA.
AP1 report is provided in future audits to ensure that the pipelines have been tested in accordance with AS2885.	AP1 report for BLB1 pipeline was unable to be sighted during Audit.	The Auditor considers this item has not been addressed. Recommendation: AP1 report is to be provided in future audits to ensure that the BLB1 pipelines have been tested in accordance with AS2885.
Strategies, plans and programs under the development consent must be reviewed within 3 months of submission of this IEA Report or any other items listed in Schedule 4- 6 of the consent conditions MP06_0089	Evidence of OEMP review within 3 months of the last 2023 IEA was unable to be sighted.	The Auditor considers this item has not been addressed. Recommendation: Vopak must review and if necessary, revise plans/strategies/programs required under this approval.

Table 3.6 Assessment of Previous Audits under SSD 7000 Consent Conditions (Site B4A)

Recommendation from Previous Audit (3 May 2022) for B4A site for SSD 7000	How The Recommendations Have Been Addressed	Auditor's Assessment
Strategies, plans and programs under the development consent must be reviewed within 3 months of submission of this IEA Report or any other items listed in consent condition C8.	Evidence of OEMP review within 3 months of the last 2023 IEA was unable to be sighted.	The Auditor considers this item has not been addressed. Recommendation:

Recommendation from Previous Audit (3 May 2022) for B4A site for SSD 7000	How The Recommendations Have Been Addressed	Auditor's Assessment
		Vopak must review and if necessary, revise plans/strategies/programs required under this approval.
A copy of this IEA and Vopak's response must be uploaded to the public website following completion of this IEA.	IEA and Vopak's responses are available in the public website (https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en) when accessed on 12 September 2024.	The Auditor considers this item has been addressed.
Many of the records required for Audit purposes have been stored in emails. It is recommended that information should be kept in a document controlled system (either as hardcopy or softcopy).	Records are still stored in emails. With the change of SHEQ Managers, a number of records were unable to be sighted.	The Auditor considers this item has not been addressed. Recommendation: Information should be kept in a document-controlled system (either as hardcopy or softcopy).
Incident with potential of material harm to the environment will need to be reported to the Secretary within the timeframe provided in condition C9.	Vopak provided an excel copy of incident register that indicated there was no incident that may cause or threaten to cause material harm to the environment. The definition of material harm found in the condition of consent was used.	The Auditor considers this item is not applicable in this current Audit, but the previous recommendation should still apply for future audits. Recommendation: Incident with potential of material harm to the environment will need to be reported to the Secretary within the timeframe provided in condition C9.
Internal Audit is to be completed.	Vopak previously provided Vopak (31 March 2021) Audit Report No: 2201 on road tanker drivers.	The Auditor considers this item has been addressed.
Pipeline flange and pump seal are to be included in current Air Emissions verification for B4A.	NPI for 2022 to 2023 includes fugitives air emission for B1 to B4A sites. NPI for 2023 to 2024 are being prepared.	The Auditor considers this item has been adequately addressed.
All complaints and incidents should be listed in EPL Annual Return.	Vopak provided an excel copy of incident register that indicated there was no complaint or incident that may cause or threaten to cause material harm to the environment. The definition of material harm found in the condition of consent was used.	The Auditor considers this item is not applicable in this current Audit, but the previous recommendation should still apply for future audits. Recommendation: All complaints and incidents should be listed in EPL Annual Return.

3.6 OEMP, Sub-plans and Post Approval Documents

The Auditor considers that the OEMP and sub-plans are appropriate for the site operation to minimise environmental impacts, noting that the following recommendations:

- OEMP details in Section 1.4 (Revision) should be updated. Specific comments on the OEMP are as follows:
 - Details in Table 4.1 (Roles and Responsibilities) should be updated.
 - The requirement for slop recording in the OEMP Table 5.1 should be reviewed to be consistent with Annual Return requirement.

- The last two paragraphs of Section 6.2 should reflect a combined IEA Audit every 3 years from November 2024. The latest HAZOP audit date, and the HAZOP requirements moving forward should be updated.
- The OEMP should be a standalone document and Appendix B (OEMP Table), H (Air Quality Management Plan), I (B4A Water Management Plan), and L (Waste Management Plan) should be provided in full within the OEMP.
- Air Quality Management Plan is required by both SSD and MP, however the current Air Quality Management Plan only refer to B4A. The Auditor noted from the information provided by Vopak most mitigation measures were applied to B1 - B4A Sites. It will be prudent to review the Plan to reflect the inclusion of B1 to B3 Site, noting that exceedances to EPL should be reported in the Annual Returns.
- Although the Water Management Plans was triggered by SSD 7000 Conditions during B4A development, the Auditor noted from information provided by Vopak that most mitigation measures were applied to B1 - B4A sites. It will be prudent to review the Plan to include B1 to B3 Site to satisfy the MP06_0089 environmental assessment (EA) requirement.
- The Waste Management Plan should make reference to NSW Waste Classification Guidelines and summarise the relevant requirements of the guidelines.
- The Site Stormwater Management (20 July 2021) should be included in the OEMP for completion and should consider the following:
 - The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.
 - Noting EPA's agreement on no sampling from the Discharge Point 16, the Site Stormwater Management Plan should be updated.

3.7 Discussion of Other Matters

The Auditor does not consider that there are other matters, based on regulatory requirements and legislation or the development's past performance, other than those covered in this IEA.

3.8 Outcomes of Consultation with Relevant Agencies and/or Stakeholders

Prior to conducting the site audit, Geosyntec consulted with DPHI, Council, EPA, and NSW Port. Consultation correspondence and responses from the Agencies are provided in Appendix C. The consultation indicated:

- No response was received from EPA.
- NSW Port did not have any additional concerns which needed to be included in the Audit. However, expect a copy of the report from Vopak, in accordance with the lease obligations.
- DPHI provided feedback on items to be addressed as part of the Audit.
- Council resent council comments for the 2023 Audit.

Stakeholder feedback and Geosyntec's assessment findings are presented in Table 3.7.

Table 3.7. Consultation with Stakeholders and Evaluation Findings

Agency	Feedback	Geosyntec's Assessment
DPHI	Correspondence dated 9 September 2024 stating:	
	<ul style="list-style-type: none"> The department would like the IEA to provide an assessment of the environmental performance of the project, with a focus on Noise and Air Quality; Review the Consent, Environmental Management Plans, Sub-Plans and EIS; and assess the project's performance against Noise and Air Quality performance at the site for the reporting period, in relation to the referenced documents. 	Assessed in Audit Table (Appendix F) items G56 to G60 and G92 to G95 for MP06_0089 Mod 2, items G139 to G143 and G151 for SSD 7000 and items G259, G270, and G271 for OEMP implementation. Mitigation measures for operational stage from MP06_0089 EA and SSD 7000 EIS are repeated in the SSD, MP, and/or site OEMP/sub-plans. Detailed discussion for each of these aspects is provided in Section 3.11.
	<ul style="list-style-type: none"> Provide commentary on whether the auditor considers the environmental management plans adequate. 	This is addressed in Section 3.6 of this report in accordance with the IAPAR requirement.
	<ul style="list-style-type: none"> The IEA report is to include a site plan clearly identifying each of the Consent's covered by the audit (SSD 7000 and MP06_0089) and provide some commentary on how the 2 areas function (collectively / independently) 	<p>A site plan clearly identifying each of the Consent's covered by the audit (SSD 7000 and MP06_0089) are depicted in Appendix A of this report.</p> <p>Section 1.1 of this report provides commentary on how the two areas function.</p>
	<ul style="list-style-type: none"> Consult with the EPA, Port Authority of NSW, local Council, and any other agencies that may be referenced in the Consents or identified in the Environmental Management Plans for each Consent 	EPA, Port Authority of NSW, and the local Council were consulted. The outcomes of consultation are provided in table and Section 3.8
Randwick Council	Correspondence dated 11 September 2024 refers to comments sent in February 2023 for the previous IEA audit.	Council provided the same feedback as the previous IEA and Geosyntec had advised that these items were addressed in the previous IEA.
	<ul style="list-style-type: none"> Emission control from fuels tanks and pipelines 	Assessed in Audit Table (Appendix F) items G62 and G112 for MP06_0089, items G137, G139 and G140 for SSD 7000 and items G240, G250-252, G260, G262, and G271 for OEMP implementation.
	<ul style="list-style-type: none"> Leak detection and emergency response procedures 	<p>Assessed in Audit Table (Appendix F) items G249, G256, G267, G269, G277, G279, G295 and G296.</p> <p>It is noted that all tanks are bunded, which will capture spills or leakage. Section 5 of the AQMP states that AECOM (2017) recommended a leak detection survey be completed to determine the extent of fugitive benzene emissions associated with leaks from the pipeline flanges and pumps. Where leaks are detected, Vopak will investigate options to minimise benzene fugitive emissions including replacing pump or flange seals. NPI for 2022 to 2023 includes fugitives air emission for B1 to B4A sites.</p>
	<ul style="list-style-type: none"> Hazard risk assessment ensuring these are up to date and relevant to current volumes and fuel types; 	A hazard and safety audit of site operations will be completed by another party and is outside the scope of this audit.

Agency	Feedback	Geosyntec's Assessment
	<ul style="list-style-type: none"> Vehicles movements coming to and from the site and whether these are following the Dangerous Goods routes and not using residential streets; 	<p>Assessed in Audit Table (Appendix F) item G41.</p> <p>As part of the Vopak Gantry User Terminal Access Agreement (Document FOPS058C), transporters are required to not transport hazardous goods along Stephen Road and Botany Road west of their intersection with Foreshore Road, unless for local deliveries only.</p>
	<ul style="list-style-type: none"> Noise pollution from operations especially of a night time, with reversing alarms and vehicle noise; 	<p>Assessed in Audit Table (Appendix F) items G57, G92-G95, G151, G259.</p>
	<ul style="list-style-type: none"> Air and water pollution making sure existing controls are being maintained and are working effectively; 	<p>Assessed in Audit Table (Appendix F) items G90-G91, G139-G143, G186, G202, G207, G208, G240, G250-G252, G262, G269-G274.</p> <p>Summary is also provided in Section 3.11 below.</p>
	<ul style="list-style-type: none"> Odour impacts on adjacent community historic Vopak complaint from 2020 	<p>This item was assessed in Geosyntec IEA Report for Site B4A dated 3 May 2022 (ref: 21292R1) and in Geosyntec IEA Report for Site B4A1 to B3 dated 28 July 2023 (ref: AU12221R1), which are reproduced as follows:</p> <ul style="list-style-type: none"> Interviews with Vopak indicated that the works described in this correspondence with Council is in relation to the Asphalt/Bitumen Plant, which is outside the B1-B4A Sites. <p>This item is not considered to be applicable to Vopak operations (bulk fuel storage), and this was supported by observations made during the site walkover (no malodourous odours noted from Vopak Site B1-B4A facility).</p>
NSW EPA	<p>Correspondence dated 13 September 2024 states:</p> <p>In Annual Reporting Period 01/07/2021 to 30/06/2022 the following are the non-compliances</p> <ul style="list-style-type: none"> During storm water discharge event TSS was above the license limit three times and pH was below the license limit once Discharge Point 16 was not sampled at the required frequency given the agreed design was not able to be sampled, previously discussed with EPA. A flame failure of the vapour combustion system occurred on 6 and 7 March 2022 (between 1500hrs - 1800hrs and 1500hrs - 1630 hrs respectively) resulting in trucks being loaded to the bypass stack. 	<p>Noted.</p>
	<p>In Annual Reporting Period 01/07/2022 to 30/06/2023 the following are the non-compliances</p> <ul style="list-style-type: none"> BOD and pH of the discharge water were above license limit once and TSS of the discharge water was above license limit twice. 	<p>Noted.</p>

3.9 Complaints and Management of Complaints

Vopak provided an incident register in Vopak Australia website (https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en) that suggest there has been no complaint during the Audit period. During the current Audit, Vopak also verbally confirmed that there has been no complaint received during the audit period for B1 to B4A Sites.

3.10 Incidents and Management of Incidents

During the Audit, Vopak provided an excel copy of the incident register from Enablon that provides list of incidents B1 to B4A. The register observed generally included near misses, unsafe conditions/acts, and spills. Samples of incidents were recorded as follows:

- 9/6/2022: Spill incident from truck. Spill volume of 758L was cleaned up and returned as slop. Investigation and the management plan prepared.
- 8/9/2023: Compartment # 4 internal valve did not shut, resulting in approximately 10 litres of diesel spilt onto ground in RTL bay #4. Spill was cleaned with spill pads, control room notified, and trailer locked with Tier 3 (warning) letter.
- 20/3/2024: Approximately 15 litres of Jet fuel spilled in the bunded area when earthed bucket was filled under no supervision. The meter drain was closed immediately, the spill contained with absorbent pads, and the incident investigated.
- 13/5/2024: Approximately 15 litres of MLA 4 spilled on Sunny Liger ship deck due to ship's diaphragm pump failure. Operation was stopped and the area was cleaned up in the presence of Sydney port personnel who happens to be on site.
- 21/6/2024: 98RON PULP spilled from the vessel Forever Splendor releasing approximately 20kg to the ships deck. Operation stopped, terminal manager advised and clean up performed. It is reported that all personnel were safe, and product did not enter the water.
- 06/04/24: The neighbour's contractor who was completing works in the neighbouring site observed to have drained soil laden dirty water to Vopak stormwater system. Vopak shift leader was notified for action.

No incident that may cause or threaten to cause material harm to the environment was observed in the review of records provided from Vopak operational activity. The condition consent defines that material harm comprises harm that:

- *'involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or*
- *results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).'*

Therefore, no incident notification has been conducted to DPHI by Vopak.

Based on the information, the Auditor considers that Vopak has an adequately rigorous system of recording incidents and incident management.

3.11 Performance of Environmental Management Plans

The review of operational mitigation measures listed in MP06_0089 EA, SSD 7000 EIS, and relevant documents associated with the operational phase versus actual impact is assessed in the Audit Table (Appendix F) and is summarised in Table 3.8 and Table 3.9 for MP06_0089 EA, SSD 7000 EIS, respectively.

Table 3.8. Assessment of Performance Against the MP06_0089 EA

Environmental Aspect	Requirement	Auditor's Review
EA (2007) – associated with B3 only		
Traffic Management during Operation	<p>All traffic would access the site via Simblist Road and exit the site via Friendship Road. Council and the Nature Conservation Council (NCC) have not considered the fact that this increase in heavy vehicle traffic would be offset by the end of container storage activities.</p> <p>Conditions of approval restrict vehicle movements associated with the facility to non-residential roads and prevent vehicles from parking or queuing outside the site in order to ensure that traffic impacts are mitigated.</p>	<ul style="list-style-type: none"> The Traffic Management Plan has been prepared and attached to the OEMP as Appendix E. The TMP provides the required elements listed in the EIS. The roads around the site are non-residential: a one-way Simblist Road (for entry) and a one-way Friendship Road (for exit). Vopak advised that vehicles do not use residential roads. It is noted that the site is surrounded by heavy industrial facilities. During the audit there was no vehicle observed to parked or queueing outside the site. Vehicles were observed to enter and exit the site in a forward movement at the time of Audit. As part of the Vopak Gantry User Terminal Access Agreement (Document FOPS058C), transporters are required to not transport hazardous goods along Stephen Road and Botany Road west of their intersection with Foreshore Road, unless for local deliveries only. Review of the incident register provided by Vopak indicates the following traffic incidents occurred: <ul style="list-style-type: none"> A vehicle reversed into a parked car in Vopak car park. A truck hitting the exit gate while exiting. Vehicle open toolbox collided with the Entry Gate Monitor as it approached the gate. Collision of two truck trailers due to misjudgement when turning. Based on the complaint register provided, there was no complaint associated with traffic and transport during operational phase.
Soil and Water Quality for Operation	<ul style="list-style-type: none"> Tank storage areas would be fully bunded. All of the storage areas would drain to the on-site wastewater treatment plant which would treat the runoff prior to discharge to Botany Bay. Runoff from the road tanker loading area would be drained to a holding tank for off-site treatment. Runoff from general hardstand areas would drain to the existing interceptor pit, for settling and separation prior to discharge to Botany Bay. The recommended conditions of approval require that the existing Water Quality Management Plans be updated to include the proposed expansion (B3) 	<ul style="list-style-type: none"> The tank storage areas and manifold are bunded. The bunds will contain accidental minor spills or leaks. The bunded areas are connected to a collection sump which can be pumped to a wastewater storage tank. Liquid (i.e., product) that enters the bunded areas is potentially contaminated and would be pumped to the storage tank for treatment and/or disposal to an EPA approved waste handling facility. The Site has emergency response procedure (OPS09 .1B) and has an emergency shutdown system (ESD). Vopak stated that: <ul style="list-style-type: none"> Site B loading arm is fitted with an emergency shutdown valve and a quick release dry break coupling. B3 ESD system is equivalent to a SIL-2 system (AS61508, safety integrity level) and includes a certified ESD-PLC.

Environmental Aspect	Requirement	Auditor's Review
	to ensure that runoff from the expansion is adequately managed.	<ul style="list-style-type: none"> Stormwater from the gantry that is collected during the loading/unloading operations is visually assessed. Stormwater runoff that is potentially contaminated is designed to flow to a treatment area and is inspected and assessed prior to discharge. Vehicle kerbs are present around the loading gantry to mitigate potential impact from vehicle collision. In 2007 EA, it was noted that the Department and the DEC have reviewed the water quality management system and generally concur with a conclusion that existing monitoring and management measures on the site would be sufficient to comply with the pollutant limits permitted by the DEC licence. Vopak (23 June 2021) Water Management Plan (WMP) Vopak Site B4A. Although Water Management Plans was triggered by SSD 7000 Conditions during B4A development, the Auditor noted that most mitigation measures were applied to B1 to B4A. It is recommended that the OEMP is reviewed to reflect the inclusion of B1 to B3 in Water Management Plan. Review of the incident register indicated incident relating to soil and water during the operational phase were contained and cleaned up with spill kit except the incident on 06/04/24 when contractor completing works in the neighbouring site drained soil laden dirty water to the Vopak stormwater system. Vopak shift leader was notified for further action. It is noted that this would enter the water treatment area and considered unlikely to present an environmental harm.
Visual	<ul style="list-style-type: none"> The proposed facilities would include white, 24-metre-high storage tanks and associated lighting masts 	<ul style="list-style-type: none"> The Auditor observed that the facilities are painted in white. Site was observed to be in an orderly manner.
EA (2016) which is associated with expansion under MOD2		
Noting that the expansion approved under Mod 2 has not commenced yet, the majority of the requirements stipulated in EA (2016) are non-triggered at the time of Audit. The applicable items are listed below.		
General management plan	<ul style="list-style-type: none"> Air Quality Management Plan. A waste management plan in accordance with the EPA Environmental Guideline: Assessment, Classification and Management of Liquid and Non-Liquid Waste (2004 edition). Mitigation and management measures identified in this EA and any subsequent approval conditions as issued by the SPC. 	<ul style="list-style-type: none"> Air Quality Management Plan and Waste Management Plan have been prepared. <p>It is recommended that an updated OEMP (2024) with all sub-plans, including Waste Management Plan should be finalised and provided to DPHI for approval.</p>
Hazards & Risks	Effective procedures be developed for adequate containment and disposal of ethanol spills in the unloading bay given that it is soluble in water and there exists the possibility of off-site impact via water/ethanol releases.	<ul style="list-style-type: none"> ENABLON incident register did not indicate ethanol spills. Vopak Stormwater Management Plan (20 July 2021) states that <i>"any sump where product leak is suspected from ethanol pipeline or tank is to be quarantined until full assessment is carried out"</i>. Vopak also advised that if wastewater in the sump is unsuitable for the wastewater treatment plant, the stormwater must not be discharged, and the manager will be contacted. If required, a licensed waste contractor will be engaged. <p>It is recommended that Vopak considers inclusion of the Stormwater Management Plan as an OEMP sub-plan.</p>
Air Quality	Vopak commits to investigating and if practicable implementing benzene reduction	<ul style="list-style-type: none"> EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan has

Environmental Aspect	Requirement	Auditor's Review
	opportunities as required under an EPL pollution reduction program for the project.	<p>been prepared and attached to the OEMP. The AQMP provides the required elements listed in the EIS.</p> <ul style="list-style-type: none"> • Vopak annual return 2023-2024 shows a reduction of benzene emission (763 kg) compared to 2022-2023 annual return (823 kg). • Vopak Budget Book 2024 stated that since 2022 there has been 2.4 tonnes reduction in VOC emission. • Vopak is still continuously improving the IFR (internal floating roof). Every year the site replaces 2-3 tanks IFR. When IFR is replaced, Vopak also ensures there is secondary seal for the IFR. In 2024, there were 4 tanks IFR replaced. • Based on information provided by Vopak, greenhouse gas emissions are reported monthly to Royal Vopak. • Tanks were also inspected and reported.
Noise	<ul style="list-style-type: none"> • All combustion engine plant, such as generators, compressors and welders will be checked to ensure they produce minimal noise with particular attention to residential grade exhaust silencers. • Machines found to produce excessive noise compared to industry best practice should be removed from the site or stood down until repairs or modifications can be made. 	<ul style="list-style-type: none"> • No excessive noise was observed during the audit onsite. • Vopak Occupational Hygienist Assessment report by WSP (15 August 2024) indicates that there were no static noise exposure samples exceeding the regulatory standards of LAeq,8h, of 85 dB(A) or the regulatory standards of LCpeak of 140 dB(C)), with the exception of the fire pump house areas, where hearing protection must be worn in these areas when in operation. • Vopak stated that there is no equipment with excessive noise above the industry's best practice. Fire water pump is only operational once a week for approximately 15 minutes during the day for test purposes, unless there is a fire on site, which has never occurred. • Complaint register showed that there has been no complaint pertaining noise in this Audit period. • Review of the incident register indicated no incident relating to noise during the operational phase.
Water quality	<ul style="list-style-type: none"> • During operations groundwater monitoring would continue to be undertaken in accordance with the conditions of the EPL. • Monitoring undertaken to ensure that stormwater management measures are working effectively. Monitoring would rely primarily on soil and groundwater bores, visual inspections and sampling. Visual inspections should be undertaken of bunded areas, pits, diversion and catch drains and all other stormwater conveyance structures. • Spill kits on new access roads. 	<ul style="list-style-type: none"> • Geosyntec (2024) report presents a groundwater monitoring that is part of biannual monitoring. • The bund and pits are inspected before release to the WWTP. • Spill kits were noted on site. • Review of the incident register indicated incident relating to soil and water during the operational phase were contained and cleaned up with spill kit except the incident on 06/04/24 when contractor completing works in the neighbouring site drained soil laden dirty water to the Vopak stormwater system. Vopak shift leader was notified for further action. It is noted that this would enter the water treatment area and considered unlikely to present an environmental harm.
Visual	<ul style="list-style-type: none"> • All work sites to be left clean and tidy and the contractor shall maintain the site in an orderly manner. 	<ul style="list-style-type: none"> • Site was observed to be in an orderly manner during the audit.
Waste	<ul style="list-style-type: none"> • All waste would be securely stored to ensure that any pollutants are prevented from escaping. • All waste to be managed in accordance with EPA Environmental Guideline: Assessment, Classification and Management of Liquid and Non-Liquid Waste (2004 edition). 	<ul style="list-style-type: none"> • Waste Management Plan Vopak Sydney Rev 6 (27 August 2021 reviewed on 9 November 2021) has been prepared and attached in the OEMP as Appendix L. • It is recommended that an updated OEMP (2024) with all sub-plans, including Waste Management Plan, should be finalised and provided to DPHI. • No waste stockpiles were observed on site during audit.

Environmental Aspect	Requirement	Auditor's Review
		<ul style="list-style-type: none"> • Vopak stated that liquid waste is stored in slop tanks. Hard waste (metals etc.) are recycled. Others are disposed of to skip bins. • Disposal documentations sighted included Cleanaway records of flammable liquid waste disposal (organic solvent excluding halogenated solvents) • It is noted that emulsion waste is collected by a waste collector, as required. • No evidence of incidents of material harm was reported in the incident register provided to Geosyntec during the Audit period.
Dust and sediment	This item is not part of EA.	<ul style="list-style-type: none"> • No evidence of unacceptable dust or sediment on road was observed.

Table 3.9. Assessment of Performance Against the SSD 7000 EIS

Environmental Aspect	Requirement	Auditor's Review of Implementation of Operation Management Plan
Management Plan	Vopak will undertake review and update to their existing OEMP in consultation with DP&E as required by the Project.	<ul style="list-style-type: none"> • Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A, ('the OEMP') was prepared for the site. • Evidence of submission and approval from DPHI were unable to be sighted, noting that DPHI advised Vopak to submit under SSD7000 instead of MP06_0089 by 31 October 2024. • Recommendation: OEMP approval should be obtained to meet Condition C4 of SSD consent.
Hazards and Risks	<p>The effectiveness of the safeguards assumed to be in place and accounted for in the QRA should be verified as part of the design process;</p> <p>Vopak undertake a review of emerging engineering measures (for example modification to tank top design) that may be able to be implemented to eliminate formation of large flammable clouds due to tank overfill scenarios;</p> <p>As part of the review of the emergency response plan (ERP) that will be required for the Project, Vopak with input from Australian Container Freight Services undertake a review of access/egress from the Australian Container Freight Services site to determine if any additional emergency access or exit provisions are required in the event of an incident at the B4 site; and</p> <p>As part of the Final Hazard Analysis (which will be prepared prior to operations commencing), checklists identifying the key assumptions and constraints in the QRA at the final design stage of the Project will be developed. These will be an update to the checklists prepared for Site B as part of the current Section 75W QRA, and will simplify the hazard analysis update requirements for future changes should they arise.</p>	<p>The following documents have been prepared:</p> <ul style="list-style-type: none"> • Fire & Rescue NSW (2 June 2020) Fire Safety Study Vopak B4A Expansion Project Port Botany. • Approval by Secretary Delegate on Fire Safety Study and Final Hazard Assessment (24 June 2020) • Sherpa (2015) Preliminary Hazard Analysis, Site B, Stage 4 Development ("B4 Project"), Port Botany ("PHA"). • Fitzroy Engineering (2020) Pressure Surge Study. • Vopak (6 February 2020) Vopak B4A Expansion Project ("Project"), SSD 7000 - Surge Study to WorkSafe NSW. • Sherpa (27 February 2020) Vopak B4A Expansion Project Port Botany Condition of Consent Study Final Hazard Analysis. • Sherpa (2020) Final Hazard Assessment • Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Emergency Plan is completed. <p>Hazard audits will be completed at the site every three years as per Condition B8 of the SSD7000.</p>

Environmental Aspect	Requirement	Auditor's Review of Implementation of Operation Management Plan
Traffic and Transport	<ul style="list-style-type: none"> A Traffic Management Plan was prepared for the existing Site B Facility, in accordance with the Site B project approval, and was prepared in consultation with the DPIE. This will be reviewed and updated to include the Project; Measures identified to manage potential traffic impacts include: <ul style="list-style-type: none"> An induction process for drivers; Entry and exit conditions and requirements; Site traffic movements; and Approved operational access and egress routes. 	<ul style="list-style-type: none"> The Traffic Management Plan has been prepared and attached to the OEMP (Appendix E). The TMP provides the required elements listed in the EIS. The roads around the site are non-residential: a one-way Simblist Road (for entry) and a one-way Friendship Road (for exit). During the audit there was no vehicle observed to parked or queueing outside the site. Vehicles were observed to enter and exit the site in a forward movement at the time of Audit. Vopak advised that vehicles do not use residential roads. It is noted that the site is surrounded by heavy industrial facilities. As part of the Vopak Gantry User Terminal Access Agreement (Document FOPS058C), transporters are required to not transport hazardous goods along Stephen Road and Botany Road west of their intersection with Foreshore Road, unless for local deliveries only. Review of the incident register provided by Vopak indicates the following traffic incidents occurred: <ul style="list-style-type: none"> A vehicle reversed into parked car in Vopak car park. A truck hitting the exit gate while exiting. Vehicle open toolbox collided with Entry Gate Monitor as it approaches the gate. Collision of two truck trailers due to miss judgement when turning. Based on the complaint register provided, there was no complaint associated with traffic and transport during operational phase.
Air Quality	<ul style="list-style-type: none"> The existing OEMP currently in place for the operating Site B Facility will be reviewed and updated to ensure all reasonable and feasible air quality management measures have been incorporated into the operation of the Project. All vehicles and plant/equipment should be fitted with appropriate emission control equipment and be serviced and maintained in accordance with the manufacturers' specifications. Smoke from vehicles/plant should not be visible for more than ten seconds; Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading; Hard surfaces or paving should be used where possible, as unpaved routes can account for a significant proportion of fugitive dust emissions, particularly during dry/windy conditions. Routes should be inspected regularly and repaired when necessary, and roads should be swept and watered as required to limit dirt/dust build up and potential dust generation during windy conditions; 	<ul style="list-style-type: none"> EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan has been prepared and attached to the OEMP. The AQMP provides the required elements listed in the EIS. The following was observed during site visit: <ul style="list-style-type: none"> The Auditor did not observe any unacceptable dust during site visit. The site is mostly paved with hardstand. No stockpile or excavation was observed on site during Audit. Review of the incident register provided by Vopak indicates isolated odour within the B1-B3 Site as follows, noting that no odour was reported for B4A Site, which is the subject of the SSD 7000: <ul style="list-style-type: none"> 30 Nov 2022 (at B1 to B3 sites): Operator noting odour from trailer hose that had spill. Loading was stopped and trailer taken for repairs. 5 March 2024 (at B1 to B3 sites): Electrical smell in the North area of the building. Fire brigade stated that it was possibly caused by a burnt light transformer. Licensed electrician was scheduled to conduct further check the following day. Based on the information provided, there was no complaint associated with air quality during the operational phase. Vopak annual return 2023-2024 shows a reduction of benzene emission (763 kg) compared to 2022-2023 annual return (823 kg). Vopak Budget Book 2024 stated that since 2022 there has been 2.4 tonnes reduction in VOC emission.

Environmental Aspect	Requirement	Auditor's Review of Implementation of Operation Management Plan
	<ul style="list-style-type: none"> Any areas on site that are not covered with hard surfaces should be vegetated wherever possible to minimise wind erosion and associated dust generation; All vehicles should be switched off when not in use for extended periods; Water carts and/or road sweeping will be used to minimise dust generation. The frequency of these management measures will be increased during dry windy conditions; Stockpiles where hazardous material has been encountered will be wetted and covered; Active excavation area works will be wetted down with hoses; and Housekeeping will be maintained to keep exposed areas to a minimum. 	<ul style="list-style-type: none"> Vopak is still continuously improving the IFR (internal floating roof). Every year the site replaces 2-3 tanks IFR. When IFR is replaced, site also ensure there is secondary seal for the IFR. In 2024, there were 4 tanks IFR replaced. Tanks were also inspected and reported.
Noise and Vibration	<ul style="list-style-type: none"> The existing OEMP currently in place for the operating Site B Facility will be reviewed and updated to ensure all reasonable and feasible noise and vibration management measures have been incorporated into the operation of the Project. 	<ul style="list-style-type: none"> The AQMP has been updated to include the activities for site B4A. EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan. Review of the incident register indicated no incident relating to noise during the operational phase. No excessive noise was observed during the audit onsite. Vopak Occupational Hygienist Assessment report by WSP (15 August 2024) indicates that there were no static noise exposure samples exceeding the regulatory standards of LAeq,8h, of 85 dB(A) or the regulatory standards of LCpeak of 140 dB(C)), with the exception of the fire pump house areas, where hearing protection must be worn in these areas when in operation. Vopak stated that there is no equipment with excessive noise above the industry's best practice. Fire water pump only operational once a week for approximately 15 minutes during the day for test purposes, unless there is a fire on site, which has never occurred. Complaint register showed that there has been no complaint pertaining noise in this Audit period.
Soil and Water	<ul style="list-style-type: none"> The existing Water – stormwater/surface water management and control measures prepared for the Site B Facility as detailed in the existing OEMP, will be updated to incorporate the Project; and The existing soil and groundwater management and control measures prepared for the Site B Facility as detailed in the existing OEMP, will be updated to incorporate the Project. 	<ul style="list-style-type: none"> Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A, ('the OEMP') and Vopak Stormwater Management Plan (20 July 2021) has been prepared for the site. It is recommended that Vopak Stormwater Management Plan is included in Vopak OEMP as an Appendix. The Vopak (23 June 2021) Water Management Plan (WMP) Vopak Site B4A, Vopak Terminals Australia has been prepared and attached to the OEMP. The WMP provides the required elements listed in the EIS. Review of the incident register indicated incident relating to soil and water during the operational phase were contained and cleaned up with spill kit except the incident on 06/04/24 when contractor completing works in the neighbouring site drained soil laden dirty water to Vopak stormwater system. Vopak shift leader was notified for further action. It is noted that this would enter the water treatment area and considered unlikely to present an environmental harm.

Environmental Aspect	Requirement	Auditor's Review of Implementation of Operation Management Plan
		<ul style="list-style-type: none"> Based on the information provided, there was no complaint associated with soil and water during the audit period. The tank storage areas and manifold are bunded. This bund will contain accidental minor spills or leaks. The bunded areas are connected to a collection sump which can be pumped to a wastewater storage tank. Liquid (i.e., product) that enters the bunded areas is potentially contaminated and would be pumped to the storage tank for treatment and/or disposal to an EPA approved waste handling facility. Stormwater from the gantry that is collected during the loading/unloading operations is visually assessed. Stormwater runoff that is potentially contaminated is designed to flow to a treatment area and is inspected and assessed prior to discharge.
Waste	<p>The waste strategies developed for the existing Site B Facility will be updated to incorporate the Project. This can be summarised as the application of the waste hierarchy where the following will be employed, in order of preference:</p> <ul style="list-style-type: none"> Avoidance – The generation of wastes from the Facility will be avoided where possible; Reduce – Reduce resource consumption, procure materials with less packaging and implement practices to reduce waste; Reuse – Where feasible, materials will be reused onsite. However, due to the limited waste streams generated onsite, reuse options may be limited; Recycling – Paper, cardboard, glass and plastics will be available for recycling. A bin will be placed adjacent to the office which will be collected by a waste management contractor on a regular basis; and Disposal – Disposal of wastes will be minimised where possible. Putrescibles wastes from the office will be sent to landfill, with other wastes generally diverted for recycling; and <p>Waste strategies will be met through the extension of the existing Site B Waste management and control measures as detailed in the existing OEMP for operations at Site B and as part of the CEMP for waste generated during construction.</p>	<ul style="list-style-type: none"> Waste Management Plan Vopak Sydney Rev 6 (27 August 2021 reviewed on 9 November 2021) has been prepared and attached in the OEMP as Appendix L. No waste stockpiles were observed on site during audit. Vopak stated that liquid waste is stored in slop tanks. Hard waste (metals etc.) are recycled. Others are disposed of to skip bins. Disposal documentations sighted included Cleanaway records of flammable liquid waste disposal (organic solvent excl. halogenated solvents). It is noted that emulsion waste is collected by a waste collector, as required. No evidence of incidents of material harm was reported in the incident register provided to Geosyntec during the Audit period.
Visual Amenity	A Landscape Plan will be prepared to manage the visual amenity of the Project.	A Landscape Design was prepared by Ecological (7/5/2020).
Greenhouse Gas	An Energy Efficiency Plan will be prepared as part of the existing Site B OEMP to include key elements of the Project and to describe how the plan will be applied across the entire terminal and a timeframe for this to occur.	<ul style="list-style-type: none"> Based on information provided by Vopak, greenhouse gas emissions are reported monthly to Royal Vopak.

3.12 Evidence Collected through Site Inspection

The evidence collected during the site inspection is recorded in Appendix E and F and included:

- Observations of fuel storage and bunding.
- Observation of operational vehicles, traffic access and flow, pedestrian pathways, and signage as applicable.
- Observation of noise levels and the presence of noise mitigation measures.
- Observation of any potential contamination issues (such as dust, sediment on the road and into stormwater system, stormwater quality and discharge, odour).
- Observation of appropriate waste storage and disposal.
- Observation of chemical storage practices.

3.13 Evidence to Support Compliance Assessment

Evidence provided during the Audit comprised the following:

- Excerpts of EPL Annual Returns.
- A copy of incident and complaint records from ENABLON.
- Site induction materials and induction records.
- Permits and licences.
- Monitoring records.
- Other documents required by the conditions of consent.

3.14 Environmental Management Improvement Opportunities

The Auditor's recommendations on improvement opportunities are provided in Section 4.

3.15 Key Strengths of the Project Environmental Management and Performance

During the audit process, Vopak demonstrated a high level of understanding of the requirements for environmental management with good record keeping.

4 Recommendations and Opportunities for Improvements

The Auditor makes the following recommendations to improve record keeping and/or work practices onsite:

General (under both SSD and MP):

- Strategies, plans and programs under the development consent must be reviewed within 3 months of submission of this IEA Report or any other items listed in Schedule 4-6 of MP06_0089 Mod2 and Condition C8 of SSD 7000.
- As the Audits under MP06_0089 and SSD7000 are conducted concurrently, approval from the Planning Secretary should be sought to allow the same report submission time for both audits.
- A copy of this IEA and Vopak response must be uploaded to the public website following completion of this IEA.
- All exceedances to the EPL should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.
- The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.
- The volume of liquids discharged to water or solids or liquids applied to area must be provided in subsequent audit. Data shall be provided to demonstrate that the volume discharged from Point 2 meets the EPL condition.
- AP1 report is to be provided in future audits to ensure that the BLB pipelines have been tested in accordance with AS2885.
- Incident reporting must continue to be reported in accordance with the Incident Investigation and Reporting Procedure provided in the OEMP. Incidents leading to potential water contamination are to be reported to NSW Ports, as well as EPA.
- The Management Plans should be updated in accordance with the recommendations made in Section 3.6 of this audit report.
- Information should be kept in a document control system (either as hardcopy or softcopy) instead of emails.
- All complaints and incidents should be listed in EPL Annual Return.

Recommendations Specific to the MP06_0089

- Hazard audit report must also be submitted to SafeWork NSW.
- All exceedances to EPL should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.
- Future exceedances above the stormwater discharge limits should be notified to DPHI within the timeframe provided in the MP05_0089 and SSD7000, unless otherwise agreed with DPHI.
- Given that EPA has agreed that discharge point 16 does not require sampling, Vopak should consider amendment of the EPL to remove sampling requirement from discharge point 16.
- Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DPHI).

Recommendations Specific to the SSD 7000

- The OEMP and all subplans (including, but not limited to the Emergency Plan, Air Quality Management Plan and Water Management Plan) should be submitted to the Planning Secretary for approval.
- If not already conducted, Vopak should conduct a post-commissioning air emissions report as per the Condition B15. Evidence of this will need to be sighted in subsequent audit.
- If not yet obtained, a certificate for compliance must be obtained from a suitably qualified consultant to demonstrate that internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2.
- Applicable environmental performance reports such as groundwater monitoring reports shall be provided on Vopak Sydney website and kept up to date.
- As stipulated in the EIS, an Energy Efficiency Plan should be prepared as part of the existing Site B OEMP to include key elements of the Project and to describe how the plan will be applied across the entire terminal and a timeframe for this to occur.

5 Limitations

This report has been prepared by Geosyntec Consultants Pty Ltd (“Geosyntec”) for use by the Client who commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the Client and other parties. The findings of this report are based on the scope of work outlined in Section 1. The report has been prepared specifically for the Client for the purposes of the commission, and use by any explicitly nominated third party in the agreement between Geosyntec and the Client. No warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party (other than where specifically nominated in an agreement with the Client).

This report relates to only this project and all results, conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. This report should not be reproduced without prior approval by the Client, or amended in any way without prior written approval by Geosyntec.

Geosyntec’s assessment was limited strictly to identifying environmental conditions associated with the subject property area as identified in the scope of work and does not include evaluation of any other issues.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigation.

This report does not comment on any regulatory obligations based on the findings. This report relates only to the objectives stated and does not relate to any other work conducted for the Client.

The absence of any identified hazardous or toxic materials on the site should not be interpreted as a guarantee that such materials do not exist on the site.

All conclusions regarding the site are the professional opinions of the Geosyntec personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, Geosyntec has not independently verified and assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of Geosyntec, or developments resulting from situations outside the scope of this project.

Geosyntec is not engaged in environmental assessment and reporting for the purpose of advertising sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The Client acknowledges that this report is for its exclusive use.

Appendix A Figures



LEGEND

Site Boundary

This product has been created to support the main report and is not suitable for other purposes. Image courtesy of SIXmaps

Figure 1a: Site Layout Plan (B1 to B4A Sites)

Site Address: Site B (Terminals B1-B4A), 20 and 37 Friendship Road, Port Botany NSW

Not to Scale

Scale indicative only

Client: Vopak Terminals Sydney

Job Number: AU124128

Date: September 2024



LEGEND

 Site Boundary

This product has been created to support the main report and is not suitable for other purposes. Image courtesy of SIXmaps

Figure 1b: Discharge Points for Site B1 to B3, and B4A.

Site Address: Site B (Terminals B1-B4A), 20 and 37 Friendship Road, Port Botany NSW

Not to scale

Client: Vopak Terminals Sydney

Job Number: AU124128

Date: September 2024

Appendix B Auditor Declaration

Independent Audit Declaration Form

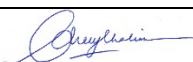

Project Name	Vopak Terminals Australia
Consent Number	MP 06_0089 MOD2 and SSD 7000
Description of Project	Operation of the B1, B2, B3, and B4A bulk liquid storage facility
Project Address	20 and 37 Friendship Road, Port Botany NSW 2036
Proponent	Vopak Terminals Australia Pty. Limited
Title of Audit	Independent Environmental Audit of the Operation of Vopak B1, B2, B3 and B4A bulk liquid storage facility
Date	21 November 2024

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Lead Auditor	Cheryl Halim
Signature	
Qualifications	<ul style="list-style-type: none"> • Exemplar Global Lead Auditor (Environmental Management Systems Auditor) (C-464022) • NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 2201) • BE (Chemical) • PhD (Chemical Engineering)
Name of Support Auditor	Lia Young
Signature	
Qualifications	<ul style="list-style-type: none"> • BE (Chemical)

	• PhD (Chemical Engineering)
Company	Geosyntec Consultants Pty Ltd
Company Address	Suite 3.04, 1 York St, Sydney NSW 2000

Appendix C Correspondence

NSW Planning ref: SSD-7000-PA-15

Avishek Biswas

SHEQ Manager

VOPAK TERMINALS SYDNEY PTY LIMITED

20 FRIENDSHIP ROAD

PORT BOTANY NSW 2036

06/09/2024

Sent via the Major Projects Portal only

Subject: Vopak Bulk Liquids Facility - Independent Auditor Endorsement

Dear Mr Biswas

Reference is made to your post approval matter, SSD-7000-PA-15, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Vopak Bulk Liquids Facility (the **development**), submitted as required by Schedule 2, Condition C11 of SSD-7000 (the consent) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 4 September 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person/s are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition C11 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team from Geosyntec Consultants Pty Ltd:

- Cheryl Halim as lead auditor; and
- Lia Young as assistant auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each

request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on 02 8275 1156 or email compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Julia Pope".

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

AU124128 L2 Consultation with DPHI SSD7000 and MPP06 0089 Vopak Terminal Port Botany 6 Sept 24

6 September 2024

Department of Planning, Housing & Infrastructure (DPHI)

Via email (compliance@planning.nsw.gov.au)

Dear Maria,

Re: Independent Environmental Audit, B1 to B4A Vopak Terminals Sydney Pty Limited

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Vopak Terminals Sydney Pty Limited (Vopak) to conduct an Independent Environmental Audit project for Site B1, B2, B3 and B4A located at 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The site is currently listed as Lot 10 DP 1126332, Lot 21 DP 1045324, and Lot 20 DP 1272410 (previously identified as Lot 1 DP 806558, Lot 21 DP 1045323, and Lot 201 DP 1210638).

The Independent Environmental Audit is conducted to meet Conditions C11 and C12 of State Significant Development (SSD) No. 7000 for 37 Friendship Road, Port Botany and Schedule 4-4 to 4-6 of MP 06_0089 for 20 Friendship Road, Port Botany.

The Independent Environmental Audit will be conducted in accordance with the NSW Government Independent Audit Post Approval May (June 2020) (IAPAR 2020). The findings of the audit for both MP06_0089 and SSD7000 will be provided in a single audit report, however the assessment of compliances and non-compliances for each of the development consent will be clearly identified in the report.

The proposed audit team includes Cheryl Halim as Lead Auditor, assisted by Lia Young as Assistant Auditor. The Audit Team has been approved by DPHI in a letter dated 6 September 2024 (attached in Attachment A).

As required by the IAPAR (2020), we need to conduct consultation with DPHI and other agencies. Please advise if DPHI has any comments/concerns regarding environmental issues relating to the project that you would like us to consider/included as part of the audit.

Should you have any queries or wish to discuss any points, please do not hesitate to contact the undersigned.

Yours sincerely,



Cheryl Halim
Independent Environmental Auditor/
Exemplar Global AU (ISO 19011:2018)
Geosyntec Consultants Pty Ltd

Attachments: Attachment A – Approval of Audit Team

Attachment A – Approval of Audit Team

From: [Maria Divis](#)
To: [Lia Young](#)
Cc: [Cheryl Halim](#)
Subject: FW: Consultation letter - Vopak Terminals Sydney, Port Botany (SSD7000 and MPP06 0089).
Date: Monday, 9 September 2024 12:59:34 PM
Attachments: [image002.png](#)
[PAR advisory letter 10 Jun 2020.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have any suspicion, please confirm with the sender verbally that this email is authentic. If you suspect fraud, click "Phish Alert Report."

Hi Lia

Thank you for consulting with the Department of Planning and Environment (**NSW Planning**) in order to obtain input into the scope of the Independent Environmental Audit (**IEA**) for SSD 7000 and MP06_0089 as modified (the **Consents**), in accordance with the Independent Audit Post Approval Requirements 2020 (**IAPARs**).

The department would like for the IEA to provide an assessment of the environmental performance of the project, with a focus on **Noise** and **Air Quality**. Please review the Consent, Environmental Management Plans, Sub-Plans and EIS; and assess the project's performance against Noise and Air Quality performance at the site for the reporting period, in relation to the referenced documents. Further to this, please provide commentary on whether the auditor considers the environmental management plans adequate. This detail is to be provided in addition to the IEA requirements outlined in the Conditions of Consent and IAPARs.

Please ensure that the IEA report includes a site plan clearly identifying each of the Consent's covered by the audit (SSD 7000 and MP06_0089) and provide some commentary on how the 2 areas function (collectively / independently).

As the project will audit under the 2020 IAPARs, please include a copy of the department's PAR advisory letter (attached) to the IEA (and future IEAs) as an appendix, stating that the project has elected to audit under the 2020 IAPARs.

Lastly, it's suggested that you consult with the EPA, Port Authority of NSW, local Council, and any other agencies that may be referenced in the Consents or identified in the Environmental Management Plans for each Consent.

For further enquiries, please contact me on the below details.

Kind regards,

Maria Divis
Senior Compliance Officer

Planning & Assessment | Department of Planning, Housing and Infrastructure

T 02 8275 1156 | E Maria.Divis@planning.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au



The Department of Planning and Environment acknowledges that it stands on Aboriginal land.

We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Lia Young <lia.young@geosyntec.com>

Sent: Friday, September 6, 2024 2:13 PM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Cc: Cheryl Halim <cheryl.halim@geosyntec.com>

Subject: Consultation letter - Vopak Terminals Sydney, Port Botany (SSD7000 and MPP06 0089).

Dear Maria Divis,

Please kindly find attached the consultation letter for Vopak Terminals Sydney (SSD7000 and MPP06 0089).

Thank you for your attention.

Kind Regards,

Lia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd

A: Suite 3.04, Level 3, 1 York Street, Sydney NSW 2000

P: +61 (2) 9251 8070

M: +61 405 578 350

Geosyntec 
consultants

[geosyntec](#) | [SiREM](#) | [savron](#)

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From: [Lia Young](#)
To: ["info@epa.nsw.gov.au"](mailto:info@epa.nsw.gov.au); ["Larissa.Borysko@epa.nsw.gov.au"](mailto:Larissa.Borysko@epa.nsw.gov.au)
Cc: [Cheryl Halim](#)
Subject: EPA consultation for Vopak Terminals Sydney IEA (AU124128)
Date: Friday, 6 September 2024 2:15:00 PM

Dear Larissa,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Vopak Terminals Sydney Pty Limited (Vopak) to conduct an Independent Environmental Audit for Site B1, B2, B3 and B4A operation that is located at 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The site is currently listed as Lot 10 DP 1126332, Lot 21 DP 1045324, and Lot 20 DP1272410 (previously identified as Lot 1 DP 806558, Lot 21 DP 1045323, and Lot201 DP 1210638).

The Major Project Approval (MP06_0089) issued by the Department of Planning and Environment (DP&E) and SSD 7000 require the audit to be conducted in accordance with the requirements outlined in the Independent Audit Post Approval Requirements (IAPAR) 2020.

The Independent Audit PAR requires the Auditor to consult with key stakeholders.

Please advise if **EPA** has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the independent audit. The operational audit has been scheduled to take place on 16 September 2024.

Please do not hesitate to contact us if you have any questions.
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor (Cheryl Halim).

Kind Regards,

Cissillia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd

A: Suite 3.04, Level 3, 1 York Street, Sydney NSW 2000

P: +61 (2) 9251 8070

M: +61 405 578 350

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Cheryl Halim
Lead Auditor
Geosyntec Consultants Pty Ltd
Suite 3.04, Level 3, 1 York Street
SYDNEY NSW 2000

Email: Cheryl.halim@geosyntec.com

Dear Ms. Halim,

**Consultation for Independent Environmental Audit of Vopak Terminals Sydney Pty Limited,
EPL 6007, SSD-7000
20 and 37 Friendship Road, Port Botany, NSW 2036**

Thank you for your email dated 6 September 2024 regarding consultation with the Environment Protection Authority (EPA) on the independent environmental audit of Vopak Terminals Sydney Pty Limited (Vopak), located at 20 and 37 Friendship Road, Port Botany. The EPA understands that Geosyntec Consultants Pty Ltd have been approved as the auditor to undertake audits in accordance with Condition C11 of SSD-7000 (Consent).

A review of EPA records shows that Vopak holds Environment Protection Licence (EPL) No. 6007 since the approval of the Independent Audit Team on 8 February 2022 (EPA Ref. DOC22/134748) to date. During this period, several non-compliances were noted, and are summarised in the table below.

Vopak Terminals Sydney EPL 6007 non compliances

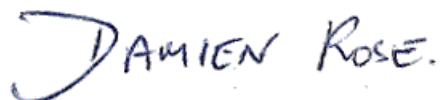
Annual Return reporting period	Number of incidents	Condition number	Summary of particulars
01/07/2021 to 30/06/2022	1	L3.6	TSS exceeded allowable limit during storm water discharge event from Point 2
	1	L3.6	TSS exceeded allowable limit during storm water discharge event from Point 2
	1	L3.6	pH was below allowable range during storm water discharge event from Point 10.
	1	L3.6	TSS exceeded allowable limit during storm water discharge event from Point 10
	3	M2.4	Discharge Point 16 was not sampled at the required frequency given the agreed design was not able to be sampled, previously discussed with EPA
	1	O4.1	A flame failure of the vapour combustion system occurred on Sunday March 6th between 1500hrs to 1800hrs and again on Monday March 7th between 1500hrs and 1630 hrs resulting in trucks being loaded to the bypass stack.
1/07/2022 to 30/06/2023	1	L3.6	BOD of discharged stormwater was above licence limit
	1	L3.6	pH of discharged water was above licence limit
	2	L3.6	TSS discharged above licence limit

It should be noted that discharge point 16 has not been able to be sampled due to Vopak being unable to access the sampling point. The EPA is aware of this issue and has previously discussed this with the licensee.

The Environment Protection licences and regulatory histories of the sites can be viewed on the EPA's Public Register <https://www.epa.nsw.gov.au/licensing-and-regulation/public-registers/about-prpoeo>.

If you have any questions in relation to this matter, please contact Natalie Tan on (02) 9585 6619 or at natalie.tan@epa.nsw.gov.au.

Yours sincerely,

A handwritten signature in blue ink that reads "DAMIEN ROSE." The signature is written in a cursive style with a large, stylized 'D'.

DAMIEN ROSE
Unit Head Regulatory Operations
Environment Protection Authority

From: [Lia Young](#)
To: council@randwick.nsw.gov.au
Cc: [Cheryl Halim](#)
Subject: Randwick Council consultation for Vopak Terminals Sydney IEA (AU124128)
Date: Friday, 6 September 2024 2:14:00 PM

Dear Sir/Madam,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Vopak Terminals Sydney Pty Limited (Vopak) to conduct an Independent Environmental Audit for Site B1, B2, B3 and B4A operation that is located at 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The site is currently listed as Lot 10 DP 1126332, Lot 21 DP 1045324, and Lot 20 DP1272410 (previously identified as Lot 1 DP 806558, Lot 21 DP 1045323, and Lot201 DP 1210638).

The Major Project Approval (MP06_0089) issued by the Department of Planning and Environment (DP&E) and SSD 7000 require the audit to be conducted in accordance with the requirements outlined in the Independent Audit Post Approval Requirements (IAPAR) 2020.

The Independent Audit PAR requires the Auditor to consult with key stakeholders.

Please advise if **Council** has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the independent audit.

The operational audit has been scheduled to take place on 16 September 2024.

Please do not hesitate to contact us if you have any questions.
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor (Cheryl Halim).

Kind Regards,

Lia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd

A: Suite 3.04, Level 3, 1 York Street, Sydney NSW 2000
P: +61 (2) 9251 8070
M: +61 405 578 350

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Lia Young

From: Oscar Guillen <Oscar.Guillen@randwick.nsw.gov.au>
Sent: Wednesday, 11 September 2024 8:41 AM
To: Lia Young
Cc: Cheryl Halim
Subject: RE: Randwick Council consultation for Vopak Terminals Sydney IEA (AU124128)

[You don't often get email from oscar.guillen@randwick.nsw.gov.au. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Please see comments sent February 2023

:

From: Rachel Ng
Sent: Tuesday, February 14, 2023 4:26 PM
To: Cissillia Young <mailto:Cissillia.Young@Geosyntec.com>
Cc: Cheryl Halim <mailto:Cheryl.Halim@Geosyntec.com>; Peter Moore <mailto:Peter.Moore@Geosyntec.com>
Subject: RE: Council Consultation for the up-coming Independent Environmental Audit for Vopak Terminals Sydney Pty Limited (AU122221)

Hi Cissillia

Thank you for your email below Council Officers have had a look through previous audit concerns and have come up with this list of issues that should be considered in the Vopak independent audit:

- * Emission control from fuels tanks and pipelines;
- * Leak detection and emergency response procedures;
- * Hazard risk assessment ensuring these are up to date and relevant to current volumes and fuel types;
- * Vehicles movements coming to and from the site and whether these are following the Dangerous Goods routes and not using residential streets;
- * Noise pollution from operations especially of a night time, with reversing alarms and vehicle noise;
- * Air and water pollution making sure existing controls are being maintained and are working effectively;
- and
- * Odour impacts on adjacent community historic Vopak complaint from 2020.

Kind Regards

Rachel Ng
Acting Coordinator Environmental Health
Randwick City Council
02 9093 6673
<mailto:rachel.ng@randwick.nsw.gov.au>
<https://nam02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.randwick.nsw.gov.au%2F&data=05%7C02%7Clia.young%40geosyntec.com%7C0929f7ec12944e84629608dcd1e9ae44%7C7125495671b047f48977c4c17bc205cb%7C0%7C0%7C638616048863839436%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=Ik%2FaCU8H7GG%2BnPnjRBv124ln0zKQPMNp9Prw5vDDrNs%3D&reserved=0>

From: Lia Young <lia.young@geosyntec.com>
Sent: Friday, September 6, 2024 2:15 PM
To: Randwick City Council <council@randwick.nsw.gov.au>
Cc: Cheryl Halim <Cheryl.Halim@Geosyntec.com>
Subject: Randwick Council consultation for Vopak Terminals Sydney IEA (AU124128)

Dear Sir/Madam,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Vopak Terminals Sydney Pty Limited (Vopak) to conduct an Independent Environmental Audit for Site B1, B2, B3 and B4A operation that is located at 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The site is currently listed as Lot 10 DP 1126332, Lot 21 DP 1045324, and Lot 20 DP1272410 (previously identified as Lot 1 DP 806558, Lot 21 DP 1045323, and Lot201 DP 1210638).

The Major Project Approval (MP06_0089) issued by the Department of Planning and Environment (DP&E) and SSD 7000 require the audit to be conducted in accordance with the requirements outlined in the Independent Audit Post Approval Requirements (IAPAR) 2020.

The Independent Audit PAR requires the Auditor to consult with key stakeholders.

Please advise if Council has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the independent audit.

The operational audit has been scheduled to take place on 16 September 2024.

Please do not hesitate to contact us if you have any questions.
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor (Cheryl Halim).

Kind Regards,

Lia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd
A: Suite 3.04, Level 3, 1 York Street, Sydney NSW 2000
P: +61 (2) 9251 8070
M: +61 405 578 350

<https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgeosyntec.com.au%2F&data=05%7C02%7Clia.young%40geosyntec.com%7C0929f7ec12944e84629608dcd1e9ae44%7C7125495671b047f48977c4c17bc205cb%7C0%7C0%7C638616048863850646%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=Ga%2FIHuPzXENWSZzMH%2B3jRQXIbUv092VXHkr9gorAksg%3D&reserved=0> |
<https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsiremlab.com%2F&data=05%7C02%7Clia.young%40geosyntec.com%7C0929f7ec12944e84629608dcd1e9ae44%7C7125495671b047f48977c4c17bc205cb%7C0%7C0%7C638616048863858137%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=%2Bk68%2BrtbgWUu1GdsMnJtFFQ%2FWNfe3YxUKmr9LmA4GTA%3D&reserved=0> |
<https://nam02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsavronsolutions.com%2F&data=05%7C02%7Clia.young%40geosyntec.com%7C0929f7ec12944e84629608dcd1e9ae44%7C7125495671b047f48977c4c17bc205cb%7C0%7C0%7C638616048863863009%7CUnknown%7CTWFpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=nUqSe5TJAGj9nS5ZomDQEN9ciETHSliZlnZIVy2iekk%3D&reserved=0>

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council%2Fnews%2Fenews&data=05%7C02%7Cia.young%40geosyntec.com%7C0929f7ec12944e84629608dcd1e9ae44%7C7125495671b047f48977c4c17bc205cb%7C0%7C0%7C638616048863867671%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=VPBVeZbjJM0Gu51v7DmlmoWlplaA8pyjMYM6mwgle78%3D&reserved=0>, a short weekly email about living in our great city.

This message is intended for the addressee named and may contain confidential information. The use, copying or distribution of this message or any information it contains, by anyone other than the intended recipient, is prohibited. If you are not the intended recipient, please delete all copies and notify the sender. Views expressed in this message are those of the individual sender, and are not necessarily the views of Randwick City Council, unless otherwise stated.

From: [Lia Young](#)
To: Enquiries@nswports.com.au
Cc: [Cheryl Halim](#)
Subject: NSW Port consultation for Vopak Terminals Sydney IEA (AU124128)
Date: Friday, 6 September 2024 2:13:00 PM

Dear Sir/Madam,

Geosyntec Consultants Pty Ltd (Geosyntec) has been engaged by Vopak Terminals Sydney Pty Limited (Vopak) to conduct an Independent Environmental Audit for Site B1, B2, B3 and B4A operation that is located at 20 and 37 Friendship Road, Port Botany, NSW 2036 ('the site'). The site is currently listed as Lot 10 DP 1126332, Lot 21 DP 1045324, and Lot 20 DP1272410 (previously identified as Lot 1 DP 806558, Lot 21 DP 1045323, and Lot201 DP 1210638).

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The Independent Audit PAR requires the Auditor to consult with key stakeholders.

Please advise if **NSW Port** has any comments/concerns regarding environmental issues relating to the project that you would like us to consider as part of the independent audit.

The operational audit has been scheduled to take place on 16 September 2024.

Please do not hesitate to contact us if you have any questions.
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor (Cheryl Halim).

Kind Regards,

Lia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd

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P: +61 (2) 9251 8070
M: +61 405 578 350

Geosyntec 
consultants
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Lia Young

From: Bryan Beudeker <Bryan.Beudeker@nswports.com.au>
Sent: Wednesday, 11 September 2024 1:02 PM
To: Lia Young; Cheryl Halim
Cc: Avishek Biswas; Trevor Brown; Robert Brooks
Subject: RE: NSW Port consultation for Vopak Terminals Sydney IEA (AU124128)

You don't often get email from bryan.beudeker@nswports.com.au. [Learn why this is important](#)

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Hi Lia and Cheryl

Thank you for reaching out to NSW Ports regarding the Vopak Independent Environment Audit (IEA) .

I have no comments on the IEA at this stage, but NSW Ports looks forward to receiving a copy of the final audit report, as has been the case previously (and as required by the lease obligations).

I have also copied Trevor Brown - WHS & Risk Manager and Rob Brooks – Ports Operation Manager for NSW Ports, should they have any comments

Should you have any questions on environment, safety or BLB operational questions during the audit, please feel free to contact myself, Trevor or Rob respectively.

Thanks and regards
Bryan

Bryan Beudeker
Environment Manager

NSW Ports
Brotherson House, Level 2, Gate B103 Penrhyn Road | Port Botany NSW 2036
D: +61 2 9316 1190 | **M:** +61 408 015 185
E: Bryan.Beudeker@nswports.com.au | www.nswports.com.au



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From: Enquiries NSW Ports <Enquiries@nswports.com.au>
Sent: Monday, September 9, 2024 8:14 AM
To: Bryan Beudeker <Bryan.Beudeker@nswports.com.au>
Subject: FW: NSW Port consultation for Vopak Terminals Sydney IEA (AU124128)

Hi Bryan

Does this email belong to you?

Thanks
Mariella

From: Lia Young <lia.young@geosyntec.com>
Sent: Friday, September 6, 2024 2:14 PM
To: Enquiries NSW Ports <Enquiries@nswports.com.au>
Cc: Cheryl Halim <Cheryl.Halim@Geosyntec.com>
Subject: NSW Port consultation for Vopak Terminals Sydney IEA (AU124128)

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Please do not hesitate to contact us if you have any questions.
We look forward to receiving your response. Thank you.

Sent on behalf of the Lead Auditor (Cheryl Halim).

Kind Regards,

Lia Young
Environmental Engineer

Geosyntec Consultants Pty Ltd

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M: +61 405 578 350

Geosyntec 
consultants

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Appendix D Record of Meeting and Agenda

AU124128 L3 Opening meeting agenda 16Sept2024

Independent Environmental Audit – Opening Meeting Agenda

Site: B1 to B4A Vopak Terminals Sydney Pty Limited

SSD and MP: MP 06_0089 for 20 Friendship Road, Port Botany (B1-B3 sites) and
SSD 7000 for 37 Friendship Road, Port Botany (B4A site)

Date & Time: 16 September 2024, 9AM on site.




Invitees:

Avishek Biswas (Vopak)	Cheryl Halim (Geosyntec)	Lia Young (Geosyntec)
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AGENDA

1. Introductions
 - a. Participants and Roles
 - b. Purpose and Objective of Audit
 - c. Scope of Audit (boundary, activities, processes)
 - d. Criteria for Audit (SSD Conditions, CEMP commitments)
2. Audit Methodology
 - a. Timing – site based/desktop based
 - b. Evidence based (record and observation)
 - c. Recording of observations (notes, photographs, discussions)
 - d. Any site limitation, cultural, religious or social sensitivities
 - e. Additional Audit requirements from Agency Consultation
 - f. Notification from DPHI or other agencies
 - g. Complaints
 - h. Incidents
3. Reporting
 - a. Method (at time of observation, closing meeting (recap, formal report)
 - b. Grading – Compliant, Non-Compliant, Not Triggered, Recommendations
 - c. Post Audit opportunity to respond prior to Final Report
4. Close out meeting – timing via Teams or email date to be confirmed

Independent Environmental Audit – Attendance Sheet

Name	Position & Company	Signature
Lia Young	Geosyntec	
Cheryl Halim	Geosyntec	
ANISHKA BISWAS	SHEQ mgr	ABiswas
Trent Martin	Terminal Manager	
John Sun	Maintenance Planner	

From: Cheryl Halim
Sent: Tuesday, 1 October 2024 10:51 PM
To: Avishek Biswas
Cc: Lia Young
Subject: AU124128 Closing Meeting and Updated Audit Table
Attachments: Vopak B1 - B4 App F Audit Table.xlsx

Dear Avishek,

Thank you for attending our Opening Meeting and field audit for the Independent Environmental Audit (IEA) on 16 September 2024.

1. Background and Objective of Email

During the site visit, we observed environmental management and conducted interviews with key Vopak representatives regarding site practices. We also completed a review of the information provided by Vopak against the IEA Audit Table included in our Audit Program.

As discussed onsite, the compliance status is evaluated as follows:

- Compliant
- Non-compliant
- Non-triggered

The purpose of this email is to provide an overview of our findings, and a request for additional information to address outstanding items.

Please treat this email as the Closing Meeting for the IEA conducted on 16 September 2024.

2. Status of Review and Timing.

The status of our Audit Tables is attached. **Please see both sheets (Audit Table & OEMP Table)**, to allow you to gather outstanding information before your leave.

Outstanding items are flagged in yellow, and we request additional information (if available) from Vopak. Items in orange are for us to update at the completion of the Audit.

At present, Item G77 (Schedule 4-5) of the MP06_0089 Mod 2 requires the audit report to be completed within 2 months of commissioning the audit. As discussed during the audit, we are likely to exceed this date, due to our capacity to book the site visit, and then prescheduled annual leave and your planned absence in October. It will be recommended that an **extension of the audit report submission be sought from the Planning Secretary**.

The draft report will be provided within 1-2 weeks before the report due date.

3. Identified Strengths

During the site audit, it was demonstrated that Vopak has proactive approach to environmental management and is amenable to suggestions on improvement. Vopak staff have high understanding of the process and environmental mitigation measures required to minimise environmental impacts.

4. Potential non-compliances and opportunities for improvement

Geosyntec identified the following potential non-compliances as detailed in the Audit table:

- Item G34 – Evidence of submission of the Hazard Audit report to SafeWork NSW was unable to be sighted.
- Item G47 – Exceedances to the EPL limits during this Audit period as reported in the Annual returns.
- Item G78 – There was no evidence of OEMP review following the last 2023 IEA.
- Item G83 – Compliance reporting was not carried out in accordance with the Compliance Reporting Post Approval Requirements every year following the approval of MP06-0089 Mod2.
- Item G167 – No evidence of OEMP review was able to be sighted within 3 months of the previous IEA. It is noted that the OEMP was finalised based on comments made during the audit and a further review was not considered required within 3 months of the current audit.
- Item G171 – The previous audit report for Site B4A was not issued within 3 months of commissioning of the audit.

5. Outstanding Items in Audit Table

Outstanding items are highlighted in yellow in the attached tables. Please provide the information by mid October 2024.

6. Site Photographs

Please send us the site photographs that were taken by the Auditor during the site visit.

Thank you for your time.

Please don't hesitate to contact us if you have any questions.

Kind Regards,

Dr Cheryl Halim
Lead Auditor

Geosyntec Consultants Pty Ltd

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[geosyntec](#) | [SiREM](#) | [savron](#)

Appendix E Photographs

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

<p>Photo Number:</p> <p>G23, G38, G52</p>	<p>Date:</p> <p>16 September 2024</p>	
<p>Description:</p> <p>Vehicles were observed to enter and exit the site in a forward movement.</p> <p>Road were covered and observed to be in good condition.</p> <p>No apparent contamination of stored products on the ground.</p> <p>Site appeared to be well maintained, no waste or source of ignition sighted.</p> <p>Site was observed to be in orderly manner</p>		  

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

<p>Photo Number:</p> <p>G27, G49, G51, G52, G237, G257</p>	<p>Date:</p> <p>16 September 2024</p>	 
<p>Description:</p> <p>Bund walls and floors are impervious and at least 1200mm and 110% capacity.</p> <p>Vopak confirmed that the bunds were equipped with level detection and high-level alarms.</p> <p>Hose and couplings are bundled.</p> <p>Chemicals are stored in a bund.</p> <p>Bund pump was observed on site.</p> <p>Tanks, mast, and facilities are painted in white.</p> <p>Site was observed to be well maintained, no waste or source of ignition sighted.</p> <p>No apparent contamination of stored products on the ground.</p>		     

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

Photo Number: G110, G238, G239, G277	Date: 16 September 2024	  
Description: Water Treatment Plant on site No waste stockpiles were observed.		

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

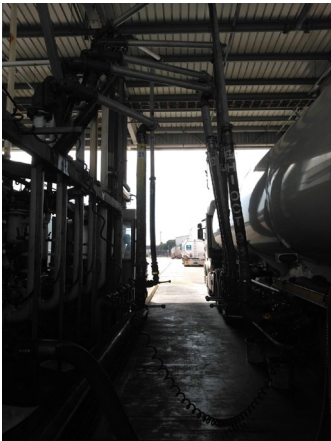
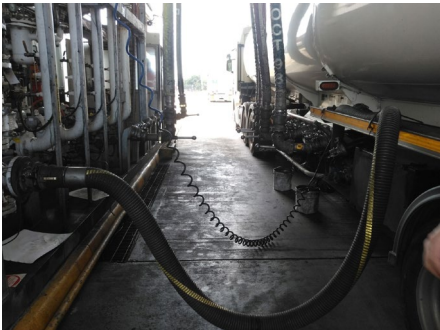
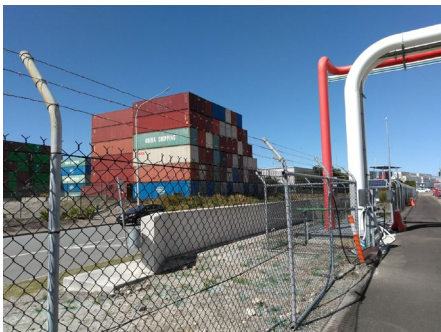
Photo Number: G52, G240, G253	Date: 16 September 2024	
Description: Vapour recovery onsite Site was observed to be in orderly manner.		

Photo Number: G241, G253, G253	Date: 16 September 2024	
Description: Site is fully fenced, with camera surveillance, and gated.		

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

Photo Number: G97, G98, G254	Date: 16 September 2024	 
Description: Spill kit on site Site was observed to be in orderly mannerwhy		

Photo Number: G58, G141, G270, G271	Date: 16 September 2024	 
Description: No dust was observed, good housekeeping onsite. Site is predominantly paved.		

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

Photo Number:	Date:	   
G47, G179, G188, G203	16 September 2024	
Description:		
Discharge points – Discharge point 16 is inaccessible for sampling. EPA notified and acknowledged the condition.		
Stormwater collection points.		

Photograph Log

Client Name:




Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

Photo Number:	Date:	  
G249	16 September 2024	
Description:		
Fire mitigation system		

Photograph Log

Client Name:

Vopak

Site Location:

Site B1-V3, B4A, 20 & 37
Friendship Rd., Pork Botany, NSW

Project Number:

AU124128

Photo Number:	Date:	
G289	16 September 2024	
Description:		
Groundwater monitoring well		

Photo Number:	Date:	
G142	16 September 2024	
Description:		
Speed limit sign		

Appendix F Audit Table

Geosyntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non-Compliant	Not Triggered
MP06_0089 Mod 2 (applicable to B1, B2, and B3)									
MP06_0089 Mod 2. Schedule 2 - ADMINISTRATIVE CONDITIONS									
G1	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 1	Obligation to Minimise Harm to the Environment	In addition to meeting the specific performance measures and criteria in this approval, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the project, and any rehabilitation required under this approval.	The Auditor has reviewed the performance measures and criteria in this consent and consider that reasonable and feasible measures have been implemented to prevent or minimise any material harm to the environment. Recommendations for future improvements are indicated in the respective conditions below.				
G2	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 2	Terms of Approval	The Proponent must carry out the project: a) in compliance with the conditions of this approval; b) generally in accordance with site and architectural plans in Appendix 1: 2515-P-2000 (Rev. 4), and 2515-P-2001 (Rev 2); c) generally in accordance with the EA; d) generally in accordance with MOD 1; and e) in accordance with MOD 2.	Record sighted previously - DP&E (Feb 2007) Vopak Site B3 Facility Expansion. In this report, the site is generally in accordance with the site and architectural plans in Appendix 1: 2515-P-2000 (Rev. 4), and 2515-P-2001 (Rev 2). Report encapsulate B1, B2, and B3 as DA38/94 and DA549/97 were surrendered. - Accessible and publicly available EA for MP06_0089 are (1) EA for B3 (Department of Planning, February 2007) which is associated with the original MP06_0089. This EA document is accessed via https://www.planningportal.nsw.gov.au/major-projects on 20 February 2022. Document is reviewed and assessed. Vopak terminal is generally in accordance with the requirement in EA document, noting that EA document refer to Appendix A which is not provided with the document publicly provided in the portal. (2) EA associated with Mod2 (Plan COMM, 23 November 2016). Vopak advised that the expansion approved under Mod2 has not commence. Photograph during site walkover was restricted and controlled. - EA available on the NSW Major Project site for MP06_0089 Mod2 is not the EA referred to in the MP06 0089 or MP06 0089Mod2. Interview: - Vopak (AB) stated that the expansion listed in MP06 0089Mod2 has not started. This table assesses the project conduct against the original MP06 0089 and MP06 0089 Mod 2. Mod 1 is no longer accessible in the NSW Major Project portal at the time of our engagement.				
G3	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 2A	Terms of Approval	2A. Consistent with the requirements in this approval, the Planning Secretary may make written directions to the Proponent in relation to: a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this approval; and b) the implementation of any actions or measures contained in any such document referred to in 2A(a) above.	Record sighted: - Vopak submission of (a) IEA report dated 19 April 2023 and (b) Vopak response, to DPHI (20 April 2023) - DPHI letter to Vopak (20 July 2023) requesting IEA report to be revised. - Geosyntec (28 July 2023) AU122221 Final R1 Rev1 IEA Report MP 06 0089 Vopak Terminals Sydney 28Jul23 (the revised report as per DPHI letter) - DPHI site visit (30 August 2023) in relation to the non-compliances. - DPHI email following the site visit (13 and 21 September 2024) states that matter will be closed out with no further action. - Vopak (17 June 2023) email to DPHI requesting a combined IEA and HAZOP for B1 to B4A. - DPHI email (20 June 2024) to Vopak agreeing to the combined audit and reporting, noting that assessment for MP and SSD are to be conducted separately. - Vopak request for AB to be the contact for the Major Project Portal (4 September 2024). - From then, AB can access and respond to 2 RFIs in Major Project Portal. - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024. - DPHI RFI (Case ID 66595956 with no date) request withdrawal of OEMP submission under the MP 06_0089. Due date 31 July 2025.				
G4	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 2B	Terms of Approval	2B. The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition 2c), 2d) or 2e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition 2c), 2d) or 2e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict. <i>Note: For the purposes of this condition, there will be an inconsistency between documents if it is not possible to comply with both documents, or in the case of a condition of approval or direction of the Planning Secretary, and a document, if it is not possible to comply with both the condition or direction, and the document.</i>	Condition noted.				
G5	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 3	Terms of Approval	If there is any inconsistency between the above, the conditions of this approval must prevail to the extent of the inconsistency.	Condition noted.				
G6	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 4	Terms of Approval	Prior to the commencement of any construction activities associated with Application No. 06_0089, the Proponent must surrender the following development consents in accordance with the EP&A Regulation: a) the Minister's consent for DA 38/94, dated 16 January 1995; and b) the Minister's consent for DA 549/97, dated 30 June 1998. Note: This approval applies to the developments the subject of DA 38/94 and DA 549/97 from the date of surrender.	Interview (Vopak: AB) and observation concurs that there has been no construction since the previous audit. Record sighted previously - Vopak letter (10 August 2007) Surrender of Existing Approvals DA38/94 and DA549/97.				

Geosyntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non-Compliant	Not Triggered
G7	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 5	Structural Adequacy	The Proponent must ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the BCA. Notes: • Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. • Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.	Interview (Vopak: AB) and observation concurs that there has been no construction since the previous audit. Record sighted previously - McKenzie Group (5 November 2021) Completion Statement No. 202856/01, stating that the completed works are generally in accordance with the relevant BCA.				
G8	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 5A	Structural Adequacy of Early Works – MOD 2	Within three (3) months of the date of approval of MOD 2, or as otherwise agreed to by the Planning Secretary, the Proponent must: a) obtain and provide a copy to the Planning Secretary of a building information certificate from Council for any structures proposed as part of MOD 2 that have been constructed or partially constructed prior to the approval of MOD 2; and b) ensure that all new structures, including any alterations or additions to existing structures, are constructed in accordance with the relevant requirements of the BCA.	Interview: - Vopak (AB) stated that Mod2 has not commenced. This is not triggered at this stage.				
G9	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 6	Demolition	The Proponent must ensure that any demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Interview: - Vopak (AB) stated that Mod2 has not commenced. This is not triggered at this stage.				
G10	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 7	Protection of Public Infrastructure	The Proponent must: a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and b) relocate, or pay the full costs associated with relocating,	Interview: - Vopak (AB) stated that Mod2 has not commenced and there has been any repair needed based on the current operation. This is not triggered at this stage.				
G11	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 8	Operation of Plant and Equipment	The Proponent must ensure that all plant and equipment used on the site is: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Record sighted : - CMMS computerised maintenance management system for January, August and September 2024 sighted. Each critical equipment is registered in the system and system will alert the maintenance team for upcoming preventative maintenance. There is Truck loading bay servicing that the system shows as an overdue maintenance for January 2024. However, Vopak stated that this was an administrative error as the maintenance report has been received from provider and attached in the system. This requires an update of the Me2 system. There is an intern helping (Vopak maintenance planner, JS) to ensure that system is kept up-to-date. Similarly for actuator valves that is due for maintenance in May 2024. The actual 17 May 2024 maintenance report was sighted in the system. The Check of 20% of the total Pressure Relieve Valves (PRV) on site were started in Feb 2024 and currently still on going, hence the status was not yet completed at the time of the audit. Due date provided by Maintenance Manager is Feb 2025. Based on the audit, the maintenance planner has a tracking sheet to ensure that work is completed by Feb 2025. Interview & Observation: - Vopak uses the Infor "ME2" computerised maintenance system to assess plant and equipment operations. - Terminal operators are trained to record maintenance requirements in ME2 which is then processed and actioned by maintenance department (where required). - Preventative and Corrective maintenance is managed in this system. - Monthly internal safety critical equipment check is a check on all equipment that has potential impact to the environmental performance and obligation. The monthly check includes a check that all critical equipment that ought to be in the system are in the system and maintenance is kept up to date.				
G12	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 9	Restrictions on Throughput	The Proponent must ensure that the throughput at the site does not exceed 7,800,000m³ of bulk liquids a year.	Record sighted: - Vopak throughput data for 1 July 2023- 30 June 2024 for Site B1 to B4A, that is sent to NSW Port as part of the contract obligation, shows that there was a total of 3,668,867 metric tonnes imported and 3,673,933 metric tonnes exported from the site via ship/truck/pipeline (noting a density of approximately 0.75tonne/m³). The table shows that Site throughput for the year is below the amount stipulated in MP06_0089 Mod2 Schedule 2-9, even when all B1 to B4A sites are included.				
G13	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 10	Restrictions on Throughput	The Proponent must not receive more than 192,500m³ of bulk liquids a year by road tanker.	Interview: Vopak customer service department advised that in 2023 calendar year there has been a total of 37,782m³ imported bulk liquid via road tanker. In 2024 calendar year to date (15 September 2024) there has been a total of 24,000m³.				

Geosy ntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non- Compliant	Not Triggered
G14	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 11	Restrictions on Throughput	The Proponent must not dispatch more than 3,700,000m ³ of bulk liquids a year by tanker, including a maximum of 2,603,876 m ³ of Dangerous Goods Class 3.1.	Record sighted: - EPL Condition R4 reporting material shows 3,133,593 m ³ in total for July 2023 to June 2024 and 2,970,819m ³ for July 2022 to June 2023.				
G15	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 12	Staged Submission of Plans or Programs	With the approval of the Planning Secretary, the Proponent may: a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the project to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the project).	Site B1 to B3 has been constructed. This is an operational IEA for Site B1 to B3 noting that OEMP has included site B1 to B3 as well as B4A (which is under SSD 7000). This condition is considered as non-triggered in this audit period as there has been no additional construction. No updated staging plan has been prepared. The plans and programs have been provided for all areas in previous audits.				
G16	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 13	Staged Submission of Plans or Programs	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.	Plans were not staged.				
G17	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 14	Staged Submission of Plans or Programs	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	Plans were not staged.				
G18	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 2 - 15	Evidence of Consultation	Where conditions of this approval require consultation with an identified party, the Proponent must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: (i) description of how matters raised by those consulted have been resolved to the satisfaction of both the Proponent and the party consulted; and (ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved. <i>Note: The Proponent may provide evidence of consultation in the form of correspondence with the relevant party.</i>	The Auditor reviewed the conditions relating to consultation. All conditions relating to consultation were either associated with development listed in Mod2 (i.e. that has not occurred) or associated with construction stage, which are not relevant to the current audit. Therefore, this condition is considered not triggered.				
MP06_0089 Mod 2. Schedule 3 - SPECIFIC ENVIRONMENTAL CONDITIONS									
G19	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3 - 1	Pre- Construction Studies	The Proponent must prepare and implement the following studies to the satisfaction of the Planning Secretary: a) a Fire Safety Study that: - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Study Guidelines; - takes into account the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems; - demonstrates the compliance of the project with AS1940; - has been prepared in consultation with the NSW Fire Brigades. b) a Hazard and Operability Study that: - addresses the process operations, fuel supply and introduction of ethanol for the project; - addresses the adequacy of control systems to ensure safe filling rates for tanks are not exceeded; - addresses the adequacy of level indication and alarm system for underground oily water tanks; - addresses the adequacy of emergency response and shutdown systems including manning levels to ensure efficient isolation of marine loading arms in the event of an emergency; - addresses the interfacing of the operating and control systems for the dedicated methanol line and flexible hoses with the rest of the operating and control systems; - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 8 – HAZOP Guidelines; - is accompanied by a program for the implementation of any recommendations made in the Study; - has been chaired by an independent qualified person who has been approved in writing by the Planning Secretary. c) a Final Hazard Analysis that: - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis. d) a Construction Safety Study that: - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 – Construction Safety Study Guidelines.	This is not relevant for Operational IEA.				

Geosyntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non-Compliant	Not Triggered
G20	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-2	Pre-Construction Studies	The Proponent must not commence construction of any works associated with the B3 bulk liquids storage facility before these studies have been approved by the Planning Secretary.	This is not relevant for Operational IEA.				
G21	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-3	Pre-Commissioning Studies	The Proponent must prepare and implement the following studies to the satisfaction of the Planning Secretary: a) a Transport of Hazardous Materials Plan that: - has been prepared in accordance with the Department's draft Route Selection Guidelines; - details arrangements for the transport of hazardous materials, including routes to be used by vehicles associated with the project carrying hazardous materials; - provides for contractual arrangements that require drivers to use the determined routes except for local deliveries or emergencies. b) an Emergency Plan that: - details procedures for the safety of all people outside the site who may be at risk from the project; - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1 – Industry Emergency Planning Guidelines; - is compatible with the NSW Ports Consolidated Port Botany Emergency Plan. c) a Safety Management System that: - addresses all on-site operations and associated transport activities involving hazardous materials; - clearly specifies all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures; - has been prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 9 – Safety Management; - is kept on the site and is available for inspection by the Planning Secretary upon request.	This is not relevant for Operational IEA.				
G22	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-4	Pre-Commissioning Studies	The Proponent must not commence the commissioning of any activities associated with the B3 bulk liquids storage facility before these studies have been approved by the Planning Secretary.	This is not relevant for Operational IEA.				
G23	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-5	Ongoing Hazard Management	During the life of the project, the Proponent must implement procedures at the entrance to the site to ensure that possible ignition sources including but not limited to matches, cigarette lighters (personal and those in vehicles) are prohibited from the site.	Record sighted: Induction material reiterates that possible ignition sources including but not limited to battery operated items, phones, matches, cigarette lighters are prohibited from the site. Observation: - During site inspection, the Auditors were requested to leave any source of ignition and wear cotton clothing. - No obvious sources of ignition were observed during site visit.				
G24	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-6	Ongoing Hazard Management	The Proponent must notify NSW Ports in writing on each occasion that flexible hoses are used for ship import and export activities. This notification must occur prior to the use of the hoses, and shall state the reasons for the use of the hoses, the intended duration of use and the quantity of product to be transferred.	Interview: - Vopak (AB) stated that this is not triggered. This is only for situation whereby, all 4 MLA (Marine Loading Arm) is out of service, and they need to use hoses instead. At present, all MLAs are in service. No hose is in use for export import activities.				
G25	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-7	Ongoing Hazard Management	Prior to the commencement of operations, the Proponent must submit for the approval of the Planning Secretary a testing and inspection program detailing the integrity measures and hydrostatic testing for all pipelines associated with the project, including the jet fuel pipeline.	This is not relevant for Operational IEA.				
G26	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-8	Ongoing Hazard Management	The Proponent must maintain a register of accidents, incidents and potential incidents at the site. The register must be made available for inspection by the Planning Secretary and any hazard auditors approved by the Planning Secretary.	Record sighted : - ENABLON is an online reporting system that record accidents, incidents and potential incidents at the site. Vopak provided 300 incident records in excel format for the Audit, 4 days after the site visit. It is noted that there were about 28 blank lines in the incident register. It is also noted that previously these lines were identified as B1 to B3 location. In the newer Incident register locations were also deleted. A few incidents that were randomly checked showed that there were impact recorded, the investigation conducted, and mitigation measure. Each month Vopak has to produce incident report to Royal Vopak, hence all incident must be investigated within 30 days. Vopak Sustainability Report also record and reported the various types of incidents. The main report provides a summary of other selected incidents. Interview: - Vopak (AB) stated that there is no incident that has actual or potential significant off-site impacts on people or the biophysical environment.				

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G27	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9	Ongoing Hazard Management	Within 24 hours of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment, the Proponent must supply a report to the Department outlining the basic facts. The Proponent must provide a further detailed report to the Department within 14 days of the incident that identifies necessary additional preventative measures.	Record sighted: - Register of incidents provided to Geosyntec was screened during the audit and the listed incidents did not indicate actual or potential significant off-site impacts during the Audit period. It is noted that there were about 28 blank lines in the incident register. It is also noted that previously these lines were identified as B1 to B3 location. In the newer Incident register locations were also deleted. Interview: - Vopak (AB) stated that there was no incident that has actual or potential significant off-site impacts on people or the biophysical environment.				
G28	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9A	HAZARDS AND RISK – MOD 2	The Proponent must: a) implement all risk control measures and safeguards proposed in the PHA (preliminary hazard analysis); b) implement all reasonable and feasible prevention measures to reduce the likelihood of major incidents; c) implement all reasonable and feasible mitigation measures to limit the consequences of major incidents; d) notify the Planning Secretary if the operation of the project has deviated from the assumptions listed in Appendix E of the PHA. Within three (3) months of notifying the Planning Secretary, the Proponent must submit an updated hazard analysis.	Interview: - Vopak (AB) stated that PHA is for Mod2 and Mod2 has not commenced. This condition is not yet triggered.				
G29	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9B	HAZARDS AND RISK – MOD 2	At least one month prior to the commencement of construction works associated with MOD 2 (except for ancillary works), or within any such time as the Planning Secretary may agree, the Proponent must update the existing Surge Analysis to be consistent with the operating conditions and carry out new surge studies for operations not included in existing studies. The outcomes of the analysis that may impact on the risk assessment must be included in the Final Hazard Analysis (FHA).	This is not relevant for Operational IEA.				
G30	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9C	Pre-construction	At least one month prior to the commencement of construction works described in MOD 2 (except for ancillary works), or within any such time as the Planning Secretary may agree, the Proponent must prepare and submit for the approval of the Planning Secretary the studies set out under subsections (a) to (d) (the pre-construction studies) of this condition. Construction, other than of preliminary works, shall not commence until approval has been given by the Planning Secretary and, with respect to the Fire Safety Study, approval has also been given by Fire and Rescue NSW (FRNSW). a) FIRE SAFETY STUDY The Fire Safety Study (FSS) of the site as required by condition 1(a) must be updated to incorporate all components described in MOD 2. The updated FSS must also be developed in consultation with FRNSW and address all recommendation raised by FRNSW. b) HAZARD AND OPERABILITY STUDY A Hazard and Operability Study (HAZOP) for the components described in MOD 2, chaired by a qualified person, independent of the project, approved by the Planning Secretary prior to the commencement of the study. The study shall be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented. c) FINAL HAZARD ANALYSIS A FHA of the site as modified by MOD 2, consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'. The FHA must: - re-evaluate and confirm all relevant data and assumptions of the PHA and, in particular, the outcomes of the surge analysis that may result in changes in the risk assessment; and - re-evaluate and confirm all proposed risk reduction measures. If the Proponent intends to defer the implementation of a risk reduction measures, reasons must be documented and agreed with Safework NSW. d) CONSTRUCTION SAFETY STUDY A Construction Safety Study, prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 'Construction Safety'. Where the construction period exceeds six months, the commissioning portion of the Construction Safety Study may be submitted two (2) months prior to commencement of commissioning of each discrete component/system of the project per the project's commissioning plan. The Construction Safety Study must identify and assess construction and demolition related hazards and the control measures that will be put in place to prevent and/or mitigate such hazards.	This is not relevant for Operational IEA.				

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G31	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9D	Pre-commissioning	<p>The Proponent must develop and implement the plans and systems set out under subsections (a) to (c). No later than two (2) months prior to the commencement of commissioning of any components described in MOD 2 (except for ancillary works), or within such further period as the Planning Secretary may agree, the Proponent must submit, for the approval of the Planning Secretary, documentation describing those plans and systems. Commissioning must not commence until approval has been given by the Planning Secretary.</p> <p>a) TRANSPORT OF HAZARDOUS MATERIALS The Transport of Hazardous Materials Plan as required by condition 3(a) in Schedule 3 must be updated to incorporate all components described in MOD 2. The study must include information on the Proponent's responsibility under the Heavy Vehicle National Law (NSW), including but not limited to, fatigue management, speeding compliance, mass, dimension and loading requirement for heavy vehicles. The study must demonstrate all practicable control measures to further reduce the risks are implemented.</p> <p>b) EMERGENCY PLAN The Emergency Plan and detailed emergency procedures for the site, as required by condition 3(b) in Schedule 3 must be updated to incorporate all components described in MOD 2. This plan must include consideration of the safety of all people outside of the site who may be at risk from operations at the site. The plan must be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'. The plan must include interim emergency management arrangements (if any) which may be introduced between the commencement of commissioning and reaching end-state terminal operations. The plan must also include a review of access arrangements from the Australian Container Freight Services (ACFS) site, with consultation with ACFS, to determine if any additional emergency access or egress provisions are required in the event of an incident in the southern or eastern parts of the site.</p> <p>c) SAFETY MANAGEMENT SYSTEM The Safety Management System that covers all on-site operations, as required under condition 3(c) must be updated to incorporate all components described in MOD 2. The document must clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records must be kept on-site and must be available for inspection by the Planning Secretary upon request. The Safety Management System must be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'.</p> <p>An inspection, testing and preventive maintenance program should be developed, implemented and maintained to ensure the reliability and availability of the key critical safety equipment is, at a minimum, consistent with the data estimated in the PHA.</p>	Expansion in Mod 2 is not built yet, thus this is not yet triggered.				
G32	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9E	Pre-startup	<p>PRE-STARTUP COMPLIANCE REPORT</p> <p>Two (2) weeks prior to the commencement of operation of each asset or system described in MOD 2 (except for ancillary works), or as otherwise agreed to by the Planning Secretary, the Proponent must submit to the Planning Secretary, a report detailing compliance with conditions 9A to 9D in Schedule 3,</p> <p>a) dates of study/plan/system submission, approval, commencement of construction and commissioning; b) actions taken or proposed, to implement the recommendations and safety-related control measures in the studies/plans/systems; c) a pre-startup safety review/checklist; and d) responses to each requirement imposed by the Planning Secretary under condition 9H(b) of this schedule.</p>	Expansion in Mod 2 is not built yet, thus this is not yet triggered.				

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G33	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9F	Post-startup	POST-STARTUP COMPLIANCE REPORT Three (3) months after the commencement of operation of the first asset or system described in MOD 2 (except for ancillary works), the Proponent must submit to the Planning Secretary, a report verifying that the: a) Emergency Plan required under condition 9D(b) in schedule 3 is effectively in place and that at least one emergency exercise has been conducted; and b) Safety Management System required under condition 9D(c) in schedule 3 has been fully implemented and that records required by the system are being kept.	Expansion in Mod 2 is not built yet, thus this is not yet triggered.				
G34	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9G	Ongoing	HAZARD AUDIT Within 12 months of the date of approval of MOD 2 and every three (3) years thereafter, or at such intervals as the Planning Secretary may agree, the Proponent must carry out a comprehensive Hazard Audit of the site. The audits must be carried out at the Proponent's expense by a qualified person or team, independent of the project, approved by the Planning Secretary prior to commencement of each audit. Hazard Audits must be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines' (HIPAP No. 5). The audit reports must, in addition to the requirements provided in HIPAP No 5: a) verify that an inspection, testing and preventative maintenance program has been developed, implemented and maintained to ensure the reliability and availability of key safety critical equipment; b) confirm the throughput and storage quantities of potentially hazardous materials are consistent with the information provided in the FHA; c) verify if the site is operating in accordance with the operating assumptions adopted in the PHA and whether an update of the Hazard Analysis and FSS is triggered by the Proponent's checklist provided in E1.3 of the PHA; d) verify implementation of any measures arising from the reports submitted in respect of conditions 9A to 9D of this schedule. Within three (3) months of receiving the final audit report, or as otherwise agreed by Planning Secretary, a copy of the report must be submitted to the Planning Secretary. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, reasons must be documented. This audit report must also be submitted to SafeWork NSW.	Record Sighted: - Vopak (27 March 2023) Vopak Site B Port Botany 2023 Hazard Audit. There is no recommendations provided in the report. Hence, there is no submission of program for the implementation of recommendations to Planning Secretary. - Post Approval Form (28 March 2023) for submission of the Hazard Audit to Planning.	This condition is considered non-compliant as evidence of submission of the Hazard Audit report to SafeWork NSW was unable to be sighted. Recommendations: Hazard audit report must also be submitted to SafeWork NSW			
G35	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9H	Ongoing	Within three (3) years of the date of approval of MOD 2 and every three (3) years thereafter, or as otherwise agreed to by the Planning Secretary, the Proponent must carry out a periodic update of the <i>Denison Street Dangerous Goods Transport Quantitative Risk Assessment (DS-DG TQRA)</i> , <i>July 2016 Update</i> , prepared by Systra Scottlister, dated 22 August 2018. The periodic update of the DS-DG TQRA must be prepared and submitted for approval of the PlanningSecretary. Each quantitative risk assessment, or update to such an assessment, must be prepared in accordance with <i>Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011)</i> . The update of the DS TQRA reports must, in addition to the requirements provided in HIPAP No 6: a) establish the methodology to estimate the annual tanker movements of Dangerous Goods Class 3.1 from the project along Denison Street. The methodology must be agreed by the PlanningSecretary prior to the submission of the DS-DG TQRA; b) report the estimated annual tanker movements of Dangerous Goods Class 3.1 from the project along Denison Street and compare these numbers against the predicted traffic movements on Denison Street provided in the EA in MOD 2; c) evaluate individual and societal transport risk on Denison Street from tanker movements of Dangerous Goods Class 3.1 based on the most recently available population and meteorological data; and d) evaluate cumulative individual and societal transport risk on Denison Street considering the Dangerous Goods Transport Quantitative Risk Assessment for Denison Street, Hillsdale prepared by Scott Lister, dated 12 February 2015.	Interview - Vopak (AB) stated: currently, development under Mod2 has not yet started. Record sighted previously: - DP&E letter to Vopak (19 October 2021) Vopak Bulk Liquid Facility (MP06 0089) Condition 9H - Change request. Letter stated that DP&E "agrees that the QRA should be updated once the works approved under Mod2 are completed."				

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G36	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-9I	Further Requirements	The Proponent must comply with all reasonable requirements of the Planning Secretary in respect of the implementation of any measures arising from the reports submitted in respect of conditions 9A to 9G of this schedule inclusive, within such time as the Planning Secretary may agree.	Interview: - Vopak (AB) stated that there has been no requirements from Planning Secretary. Mod2 has not commenced. Hazard Audit report submitted to DPHI did not attract further requirement from DPHI.				
G37	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-10	TRANSPORT. Construction Traffic	During construction, the Proponent must ensure that : a) all trucks entering or leaving the site with loads have their loads covered; and b) the trucks associated with the construction works do not track dirt onto the public road network.	Interview: - Vopak (AB) stated that there have been no requirements from Planning Secretary. Mod2 has not commenced.				
G38	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-11	TRANSPORT. Internal Road Network	The Proponent must ensure that: a) the internal road network and parking associated with the Project is designed, constructed and maintained in accordance with the latest versions of the Australian Standards AS 2890.1:2004 and AS 2890.2:2002; and c) all vehicles associated with the Project enter and exit the site in a forward direction.	Observation: - Vehicles were observed to enter and exit the site in a forward movement. - Roads were observed to be in good condition.				
G39	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-12	TRANSPORT. Vehicle Queuing	During the life of the project, the Proponent must ensure that project does not result in any vehicles queuing on the public road network. Tankers must be queued in such a manner as to ensure that there is free access around the site for fire vehicle appliances for emergency purposes. All tankers being unloaded or loaded must not remain on site for undue extended periods.	Observation: - No queuing was observed on the public road network. - There was free access for the site for emergency purposes.				
G40	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-13	TRANSPORT. Parking	During the life of the project, the Proponent must provide on-site parking for all vehicles associated with the project in accordance with the requirements of the NSW Ports.	Observation: - Onsite parking was observed near the site compound.				
G41	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-14	TRANSPORT. External Road Network	During the life of the project, the Proponent must ensure that vehicles associated with the project do not transport hazardous goods along Stephen Road and Botany Road west of their intersection with Foreshore Road, unless for local deliveries only.	Interview with Vopak (AB and TM) confirmed that Vopak Terminals Australia Gantry User Terminal Access Agreement has not changed in this regard and this agreement is applicable to all carrier delivering to and from Site B1 to B4A. Record sighted previously: - FOPS058C - Vopak Terminals Australia Gantry User Terminal Access Agreement, which cited this condition and is required to be signed by transporters.				
G42	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-14A	Construction Traffic Management Plan	The Proponent must prepare a Construction Traffic Management Plan for the construction works (except for awning works and warehouse extensions) described in MOD 2. The plan must form part of the CEMP required by condition 1B of schedule 4 and must: a) be prepared by a suitably qualified and experienced person(s) and in consultation with NSW Ports; b) be prepared to the satisfaction of the Planning Secretary prior to the commencement of construction activities as described in MOD 2; c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction; d) detail heavy vehicle routes, access and parking arrangements; e) include a Driver Code of Conduct to: (i) minimise the impacts of earthworks and construction on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) ensure truck drivers use specified routes; and f) include a program to monitor the effectiveness of these measures.	This is not relevant for Operational IEA.				

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G43	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-14B	Construction Traffic Management Plan	The Proponent must: a) not commence construction of the works described in MOD 2 until the Construction Traffic Management Plan required by condition 14A is approved by the Planning Secretary; and b) implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.	This is not relevant for Operational IEA.				
G44	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-14C	Operational Traffic Management Plan	Prior to the commencement of operation of the components described in MOD 2 (except for ancillary works), the Proponent must update the Traffic Management Plan (TMP), dated 5 December 2013 and prepared by Sherpa Consulting, to the satisfaction of the Planning Secretary. The plan must form part of the OEMP required by condition 1E of schedule 4 and must: a) be by a suitably qualified and experienced person (s) and in consultation with NSW Ports; b) detail the known heavy vehicle routes and access arrangements to and from the site; c) detail procedures for managing operational traffic, including adherence to the Australian Code for Transport of Dangerous Goods by Road and Rail, January 1998 or its latest version; d) detail traffic management measures to manage road tanker arrivals during peak periods; e) include a Driver Code of Conduct to: (i) minimise the impacts of operation on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; and (iv) advise truck drivers to use specified routes.	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
G45	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-15	SOIL AND WATER. Erosion and Sediment Control	Prior to commencement of construction (excluding awning works), the Proponent must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline and the Erosion Sediment Control Plan included in the CEMP required by condition 1B of schedule 4.	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
G46	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-16	SOIL AND WATER. Depth of Excavation	During construction, the Proponent must ensure that no excavation or work occurs more than 20 metres below existing ground level at the site, and details of all excavation work must be provided to NSW Ports prior to construction.	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
G47	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-17	SOIL AND WATER. Water and Sewer Services	During the life of the project, the Proponent must ensure that stormwater discharges comply with the requirements of any EPL for the site. There must be no discharge of water direct to Botany Bay through the bund wall. Non-contaminated water must be pumped by separate key start pump to the stormwater discharge.	Observation: - Stormwater discharge point 2 was observed. Interview: - Vopak (AB) reiterated that there has been no sampling taken for point 16 EPA. (Note: EPA response to Geosyntec consultation (as part of this IEA) acknowledge that there has been no sampling via Point 16 due to sampling access issue.) - Vopak (AB) stated that there has been no discharge of water direct to Botany Bay through the bund wall. Record sighted: - Annual Returns (2023-2024) showed no exceedance to EPL - Annual Returns (2022-2023) showed that BOD, pH and TSS exceedances are reported to EPA. - Annual Returns (2019-2020, 2020-2021, 2021-2022) showed that TSS exceedances are reported to EPA as shown in the EPL (see further items related to EPL below). Record sighted for Point 2 (site B1 to B3) and 10 (site B4A): - Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit: - Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024), 350030 (30/04/2024), 349507 (20/04/2024), 344366 (19/02/2024), 346746 (17/03/2024), 341519 (14/01/2024), 353499 (10/06/2024), 355983 (08/07/2024), 343146, 355746 (03/07/2024) . Each report provides 2 water results for TSS, BOD, pH, oil and grease except in Report 353463 (sample date 06/06/2024) that does not report Oil and grease as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria, except for TSS (63mg/L) in Report No. 353463 (sample date 06/06/2024) . - Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria. - Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022), 313404 (18/12/2022), 310556 (14/11/2022), 304896 (03/09/2022), 303913 (24/08/2022), 302736 (10/08/2022), 300897 (19/07/2022), 299587, 296052 (20/05/2022), 295029, 293979, 288330, 287866 (02/02/2022), 286632, 286360 (07/01/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in Lab report 310556 (sample date 14/11/2022), oil&grease (12mg/L) in Lab report 303913 (sample date 24/08/2022). - Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit: - Report No. 350494 (sample date 05/05/2024), - Report No. 316333 (10/02/2023), - Report No. 292592 (04/04/2022), 296167 (23/05/2022), 299680 (04/07/2022), 289791 (24/02/2022) . Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167, 316333, pH in report 292592. The Auditor also notes that the following results exceeded the EPL limits but were explained by Vopak: - TSS (63mg/L) exceedance in Report No. 353463 (sample date 06/06/2024) was collected outside the timing required by the EPL and was sampled in Pit 1 instead of Pit 3, to assess if there had been a discharge from NSW Ports that entered Vopak drain.	This condition is considered as non-compliant because there were exceedances to the EPL during this Audit period as reported in the Annual returns. The Auditor notes that the following results did not meet EPL requirements but was not reported in the annual return: - Oil & grease (12mg/L) exceedance in Lab report 303913 (sample date 24/08/2022) was not reported in 1 July 2022 to 30 June 2023 annual return. Recommendation: All exceedances should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.			
G48	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-18	SOIL AND WATER. Water and Sewer Services	During the life of the project, the Proponent must ensure that all tank condensate and other water draw-off from storage tanks is disposed of to slops tanks and not through oily water treatment systems, unless otherwise authorised by the DEC.	Interview: - Vopak (AB) stated that water draw-off is collected at the bottom of the bund and pumped to slop tank. - Tank condensate is not applicable.				

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G49	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-19	SOIL AND WATER. Spillage Control	The Proponent must ensure that all bund walls and floors are constructed of impervious materials and are of sufficient capacity to contain 110% of the largest tank in the bund. Bund walls must not be less than 1200mm high and must comply with AS1940.	This is not relevant for Operational IEA. Observation: - Bund walls were observed to be at least 1200mm high.				
G50	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-20	SOIL AND WATER. Spillage Control	The Proponent must ensure that all storage tanks are fitted with high level sensors and overflow protection devices, connected to audible and visual alarm systems, and designed to prevent the overflow of liquid from the tanks.	Interview: Vopak (AB) stated that all tanks were fitted with high level sensors and overflow protection devices, connected to alarm.				
G51	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-21	SOIL AND WATER. Spillage Control	The Proponent must ensure that hose couplings terminate within bunded areas so that spillages are contained. Where hoses can not be terminated within bunds, suitable means of collecting and retaining spillages must be provided.	Observation: - Hose couplings were observed within the bunded areas.				
G52	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-22	SOIL AND WATER. Spillage Control	The Proponent must ensure that any contamination of stored products into the ground as a result of the project is reported to the DEC and NSW Ports upon detection.	Interview: - Vopak (AB) stated that there has not been contamination of stored products on the ground during the audit period, noting that the site comprised hardstand.				
G53	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-23	VISUAL. Landscaping	During construction, the Proponent must minimise the vegetation clearing on the site.	This is not relevant for Operational IEA.				
G54	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-24	VISUAL. Landscaping	During the life of the project, the Proponent must: a) maintain the landscaping on the site to the satisfaction of the Planning Secretary; and b) ensure that the landscaping on the site does not impede driver sight distance of vehicles entering or leaving the site.	Observation: - Vegetation was adequately maintained and was not observed to potentially impede driver sight for vehicle entering or leaving the site.				
G55	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-25	VISUAL. Lighting	During the life of the project, the Proponent must ensure that the lighting associated with the project: a) complies with the latest version of Australian Standard AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting; and b) is mounted, screen and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network, or operations associated with Sydney Airport.	Record sighted: - Construction lighting is not part of the current audit. - Enablon Incident register did not indicate any complaint in relation to lighting nuisance to the surrounding properties. It is noted that there were about 28 blank lines in the incident register. It is also noted that previously these lines were identified as B1 to B3 location. In the newer Incident register locations were also deleted.				
G56	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-26	NOISE.	The Proponent must undertake all construction activities associated with the Project between the following hours: • 7:00am and 6:00pm, Monday to Friday; • 8:00am and 1:00pm, Saturdays; and • at no time on Sundays and public holidays.	This is not relevant for Operational IEA.				
G57	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-26A	NOISE.	The Proponent shall use its best endeavours to participate in the development and implementation of a precinct-wide noise map for Port Botany, should one be developed by NSW Ports. <i>Note: The aim of a noise map is to establish an efficient, equitable and cumulative noise management, monitoring and reporting framework across the precinct.</i>	Interview: - Vopak (AB) stated that the site is relatively quiet and there is no known noise map by the Port Botany that relates to Vopak. Hence this item is non-triggered. - Fire pump is in a enclosed room and only operates when it is tested for its operability unless there is fire. Test only last for 15mins each week and test is only conducted during the day, not during the night. Record sighted - WSP (15 August 2024) VOPAK Occupational Hygienist Assessment indicates that there was no static noise exposure samples exceeded the regulatory standards of LAeq,8h, of 85 dB(A) or the regulatory standards of LCpeak of 140 dB(C)), with the exception of the Fire pump house areas where hearing protection must be worn in these areas when in operation.				
G58	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27	Dust Minimisation	The Proponent must implement all reasonable steps to minimise dust generated during demolition, earthworks, construction and operation of the project.	Observation: - No unacceptable dust was observed during the audit. There was no activity observed that had the potential to result in unacceptable dust.				
G59	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27A	Dust Minimisation	During construction, the Proponent must ensure that: a) exposed surfaces and stockpiles are suppressed by regular watering; and b) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	This is not relevant for Operational IEA.				

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							Compliant	Non-Compliant	Not Triggered
G60	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27B	Concentration Limits	<p>The Proponent must ensure that vapour resulting from loading operations is recovered, so that the total concentration of unrecovered vapours emitted to the atmosphere during any period of four consecutive hours does not exceed 4 milligrams per litre of volatile organic liquid passing out of the plant during that period.</p> <p>The concentration limits specified in this condition comes into effect upon the commencement of operation of the upgraded vapour recovery unit and satisfaction of the requirements in condition 27C.</p>	Record sighted: - Ektimo (June 2023) (November 2023) (May 2024) Vapour Recovery Unit Hydrocarbon Recovery Assessment, Vopak Terminals Australia, Sydney Terminal Site B. All reported total concentration of unrecovered vapours emitted did not exceed 4 milligrams per litre of volatile organic liquid.				
G61	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27C	Validation Testing of Upgraded VRU	Within six (6) months of the approval of MOD 2, the Proponent must submit a validation study to the Planning Secretary and the EPA to verify compliance of the vapour recovery unit with the concentrations limits in condition 27B.	This item is not applicable for this audit period as MOD2 was issued in Dec 2018.				
G62	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27D	Air Quality Management Plan	<p>Prior to the commencement of operation of any component described in MOD 2 (except for ancillary works), the Proponent must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the updated OEMP required by condition 1E of schedule 4 and must:</p> <p>a) be prepared by a suitably qualified and experienced person(s);</p> <p>b) detail and rank VOC emissions from all categories of the project operated by the Proponent;</p> <p>c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;</p> <p>d) identify the control measures that that will be implemented for each emission category, including measures already in place; and</p> <p>e) describe proactive and reactive management strategies.</p>	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
G63	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-27E	Air Quality Management Plan	<p>The Proponent must:</p> <p>a) not commence operation of any components described in MOD 2 (except for ancillary works) until the Air Quality Management Plan required by condition 27D is approved by the Planning Secretary;</p> <p>and</p> <p>b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the project.</p>	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
G64	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-28	WASTE.	During the life of the project, the Proponent must implement reasonable and feasible measures to minimise the waste generated by the project.	<p>Interview:</p> <p>- Vopak (AB) stated that main waste is the slop. However, annual slop disposal was sighted to be approximately 1 tonnes per 3 million tonnes of product, which is considered to comprise small amount of waste. Vopak also confirmed that all slops are returned to Site B holding tanks for processing.</p> <p>- Vopak (AB) stated that there is also segregation of waste on site (general waste, spill kit waste, metal waste). However, waste collector segregation report was not able to be sighted.</p>	Recommendation: General waste collector should be requested to provide summary of waste volume by its types.			
G65	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 3-29	Contamination	<p>Prior to the commencement of construction activities described in MOD 2, the Proponent must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed.</p> <p>The protocol must form part of the CEMP required by condition 1B of schedule 4 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary.</p>	Expansion in Mod 2 is not built yet, thus this is not yet triggered				

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MP06_0089 Mod 2. Schedule 4 - ENVIRONMENTAL MANAGEMENT AND MONITORING									
G66	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1	ENVIRONMENTAL MANAGEMENT PLAN	Prior to construction, the Proponent must prepare (and following approval implement) an Environmental Management Plan for the project to the satisfaction of the Planning Secretary. This plan must include: a) a construction noise management plan that provides measures to minimise noise and respond to unacceptable noise generation; b) a construction waste management plan that addresses waste management during the construction phase; c) a pipeline construction management plan that describes all activities to be undertaken on the site and pipeline easements during construction of pipelines and marine loading arms, and details traffic management procedures during the installation of pipelines under Friendship Road; d) a traffic management plan that addresses truck movements during operation; e) details of the person who would be responsible for overseeing the environmental management of the project, and provide contact details for this person; f) a description of the procedures that would be implemented to: • keep the relevant agencies informed about the progress of the project; • receive, handle, respond to, record and report any complaints about the project; • resolve any disputes that may arise during the project; and • monitor and respond to any non-compliances.	This condition is mainly about Environmental Management Plan for Mod0 prior construction. Thus, it is part of IEA prior to construction of what is approved under Mod 0. However, this condition also requires "a traffic management plan that addresses truck movements during operation", as assessed below. Record sighted: -Vopak Site B and Site B4A OEMP (September 2024) that has traffic management plan section. Management Plan for expansion/upgrade items approved under Mod2 is not triggered as development approved under Mod2 is not yet constructed according to the advice provided by Vopak (AB). Interview: - Vopak (AB) stated that there has been no change in Traffic Management Plan which is attached as OEMP sub-plan. It is noted that the OEMP date and version has been revised since 2021, but Traffic Management Plan has never been revised.				
G67	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1A	ENVIRONMENTAL MANAGEMENT PLAN REQUIREMENTS	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: a) detailed baseline data; b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; d) a program to monitor and report on the: (i) impacts and environmental performance of the project; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; f) a program to investigate and implement ways to improve the environmental performance of the project over time; g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and h) a protocol for periodic review of the plan. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	OEMP (September 2024) Section 3 to 6 and its Appendix B, C, E, G to L address this condition. Site EPL, SSD, and MP are referred to and included as appendix for measures, limits, conditions and criteria to be implemented. Environmental and safety performance indicators are tracked via the site Terminal Report Card (TRC). The TRC provides an overview of the terminal operating KPIs, as well as outages of key environmental safeguards such as the VRU outages and slops volumes. The TRC also includes SHE performance indicators tracked against targets. This is updated monthly and discussed in monthly meetings.				
G68	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1B	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN –	The Proponent must prepare a Construction Environmental Management Plan (CEMP) in accordance with the requirements of condition 1A and to the satisfaction of the Planning Secretary.	This is not relevant for Operational IEA.				
G69	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1C	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN –	As part of the CEMP required under condition 1B of this approval, the Proponent must include the following: a) Construction Traffic Management Plan (see condition 14C in schedule 3); b) Erosion and Sediment Control Plan (see condition 15 in schedule 3); c) Unexpected Finds Protocol (see condition 29 in schedule 3); and d) Waste Management.	This is not relevant for Operational IEA.				
G70	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1D	CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN – MOD 2	The Proponent must: a) not commence construction of the works described in MOD 2 (except for awning works and warehouse extensions) until the CEMP is approved by the Planning Secretary; and b) carry out the construction of the works described in MOD 2 in accordance with the CEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	This is not relevant for Operational IEA.				

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G71	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1E	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	Prior to the commencement of operation of any component described in MOD 2 (except for ancillary works), the Proponent must update the <i>Operational Environmental Management Plan, Vopak Site B</i> , prepared by Vopak Terminals Australia and dated 27 September 2016 to incorporate the components described in MOD 2 and its management to the satisfaction of the Planning Secretary. The updated plan must incorporate the following: a) procedures, roles and responsibilities of key personnel involved in the environmental management of the project b) community consultation requirements for the project; c) include the following environmental management plans: (i) Traffic (see condition 14C); and (ii) Air Quality (see condition 27D).	Expansion in Mod 2 is not built yet, thus this is not yet triggered.				
G72	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-1F	OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN	The Proponent must: a) not commence operation of any component described in MOD 2 (except for ancillary works) until the updated OEMP required under Condition 1D is approved by the Planning Secretary; and b) operate the project in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	Expansion in Mod 2 is not built yet, thus this is not yet triggered. Audit is conducted based on previous Operational Management Plan				
G73	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-2	COMPLIANCE REPORTING	Prior to the commencement of construction and operation, the Proponent must certify in writing to the satisfaction of the Planning Secretary, that it has complied with all relevant conditions of this approval.	This is not relevant for the current Operational IEA. This would have been assessed prior to construction and operation for items under MOD0 approval (i.e. in the past)				
G74	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-3	COMPLIANCE REPORTING	Within 3 months of the commencement of operation of the project, the Proponent must prepare a compliance report to the satisfaction of the Planning Secretary. The report must be prepared by a suitably qualified, experienced, and independent expert whose appointment has been endorsed by the Planning Secretary and must include: a) date of commencement of operation; b) actions taken (or proposed to be taken) to implement conditions 1 and 3 of schedule 3 to this approval; and c) a signed statement that: - the transport routes specified are being followed; - the Emergency Plan required under condition 3 is effectively in place and that at least one emergency exercise has been conducted; - the Safety Management System required under condition 3 of schedule 3 has been fully implemented and that records required by the system are being kept; and - the various studies required under condition 3 of schedule 3 have been prepared in accordance with the relevant Hazardous Industry Planning Advisory Paper and all recommendations of these studies have been implemented and are being maintained.	This is part of the 2015-2016 IEA which is conducted by other consultant. This is not part of this Audit.				
G75	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-4	INDEPENDENT ENVIRONMENTAL AUDIT	Within 12 months of the approval of MOD 2, and every three (3) years thereafter, unless the Planning Secretary directs otherwise, the Proponent must carry out an Independent Audit of the project in accordance the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	The previous Operational Audit was completed in 19 April 2023 and revised in July 2023 following DPHI correspondence. The current Audit is conducted within three years after the previous Audit.				
G76	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-4A	INDEPENDENT ENVIRONMENTAL AUDIT	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: a) review and respond to each Independent Audit Report prepared under condition 4 of this approval; b) submit the response to the Department; and c) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Department and notify the Department in writing at least 7 days before this is done. <i>Note: Information deemed commercially sensitive or confidential by the Proponent does not need to be made publicly available.</i>	Interview: - Vopak previously stated that the IEA and responses were considered confidential hence not provided in the project website. Record Sighted: - IEA (19 April 2023 and revised in July 2023) - Vopak response and submission to DPHI.				
G77	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-5	INDEPENDENT ENVIRONMENTAL AUDIT	Within 2 months of commissioning this audit, or as otherwise agreed by the Planning Secretary, the Proponent must submit a copy of the audit report to the Planning Secretary, with a response to any recommendations contained in the audit report.	IEA Audit under MP06_0089 Mod 2 requirement is completed concurrently with IEA audit under SSD 7000 (noting SSD7000 requires submission of a copy of the audit within 3 months instead of 2 months).	This condition is considered non-compliant because the Audit is not completed within 2 months of commissioning of the audit, noting that there is inconsistency with the SSD 7000, which requires submission of audit report within 3 months instead of 2 months. Recommendation: As the Audit under MP06_0089 is conducted concurrently with the Audit under SSD7000, approval from the Planning Secretary should be sought to allow the same report submission time as the SSD7000 requirement for future audits.			

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G78	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-6	INDEPENDENT ENVIRONMENTAL AUDIT	Following each Independent Environmental Audit, the Proponent must review and if necessary revise the Environmental Management Plan (and any other plans/strategies/programs required under this approval) to the satisfaction of the Planning Secretary. The revised plans/strategies/programs must be submitted to the Planning Secretary within 3 months of submitting the audit report.	There was no evidence of OEMP review following the last 2023 IEA.	This condition is considered non-compliant as there was no evidence of OEMP review following the last 2023 IEA. Recommendation: After this Independent Environmental Audit, Vopak must review and if necessary revise plans/strategies/programs required under this approval. Any revised plan/strategies/programs must be submitted to the Planning Secretary within 3 months of submitting the audit report.			
G79	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-7	INCIDENT REPORTING	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Subsequent notification requirements must be given and reports submitted in accordance with the requirements set out in Appendix 3.	Interview - Vopak (AB) stated that there has been no incident of significant harm requiring reporting.				
G80	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-7A	Non-Compliance Notification	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	Interview - Vopak (AB) stated that they are unaware of non-compliance to be reported during this Audit period.				
G81	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-7B	Non-Compliance Notification	A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Interview - Vopak (AB) stated that they are unaware of non-compliance to be reported during this Audit period.				
G82	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-7C	Non-Compliance Notification	7C. A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance.	Noted				
G83	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-8	Compliance Reporting	Within 12 months of the approval of MOD 2, and in the same month each subsequent year (or such other timing as may be agreed by the Planning Secretary), Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	Interview - Vopak (AB) stated that there has been no Compliance Report carried out in accordance with the Compliance Reporting Post Approval Requirements.	This condition is considered as non-compliant because Compliance reporting was not carried out in accordance with the Compliance Reporting Post Approval Requirements every year following the approval of MP06-0089 Mod2. Recommendation: Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DPHI).			
G84	MP06_0089 Mod 2 applicable to B1, B2, and B3	Schedule 4-9	Compliance Reporting	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Department and notify the Department in writing at least 7 days before this is done.	Interview - Vopak (AB) stated that there has been no Compliance Report carried out in accordance with the Compliance Reporting Post Approval Requirements.	This condition is not triggered as no Compliance report has been prepared.			
APPENDIX 1: ARCHITECTURAL AND SITE PLANS									
NIL	MP06_0089 Mod 2 applicable to B1, B2, and B3 Mod 2 applicable to B1, B2, and B3	Appendix 1	NIL	NIL					

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APPENDIX 2: Statement of Commitments														
G85	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	General Management Plans	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">A Construction Environmental Management Plan, incorporating:<ul style="list-style-type: none">Construction Soil and Water Management Plan;Construction Traffic Management Plan;Acid Sulphate Soil procedure; andMitigation and management measures identified in this EA and any subsequent approval conditions as issued by the MinisterDevelopment of a construction staging report (Stage 1 and Stage 2).</td><td><div>Before construction</div><div>Before each stage of construction</div></td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">A Construction Environmental Management Plan, incorporating:<ul style="list-style-type: none">Construction Soil and Water Management Plan;Construction Traffic Management Plan;Acid Sulphate Soil procedure; andMitigation and management measures identified in this EA and any subsequent approval conditions as issued by the MinisterDevelopment of a construction staging report (Stage 1 and Stage 2).	<div>Before construction</div> <div>Before each stage of construction</div>	This is not relevant for Operational IEA.					
Statement of Commitments	Timing													
<ul style="list-style-type: none">A Construction Environmental Management Plan, incorporating:<ul style="list-style-type: none">Construction Soil and Water Management Plan;Construction Traffic Management Plan;Acid Sulphate Soil procedure; andMitigation and management measures identified in this EA and any subsequent approval conditions as issued by the MinisterDevelopment of a construction staging report (Stage 1 and Stage 2).	<div>Before construction</div> <div>Before each stage of construction</div>													
G86	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	General Management Plans	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Operational environment management plan incorporating:<ul style="list-style-type: none">An Air Quality Management Plan.A waste management plan in accordance with the EPA Environmental Guideline: Assessment, Classification and Management of Liquid and Non-Liquid Waste (2004 edition).Mitigation and management measures identified in this EA and any subsequent approval conditions as issued by the SPC.</td><td>Update existing Terminal OEMP</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Operational environment management plan incorporating:<ul style="list-style-type: none">An Air Quality Management Plan.A waste management plan in accordance with the EPA Environmental Guideline: Assessment, Classification and Management of Liquid and Non-Liquid Waste (2004 edition).Mitigation and management measures identified in this EA and any subsequent approval conditions as issued by the SPC.	Update existing Terminal OEMP	Record sighted: - OEMP Version 6 (September 2024) with no Appendix L able to be sighted. - Appendix L provided following Site Visit/Audit. Waste Management Plan Vopak Sydney (27 August 2021) Rev 6 reviewed on 9 November 2021 Interview during Audit: - Vopak (AB) reiterated that OEMP has Waste Management Plan as Appendix L.	Recommendation: An updated OEMP with all sub-plans, including Waste Management Plan should be finalised and provided to DPHI. Waste Management Plan should make reference to NSW Waste Classification Guidelines and should include mitigation and management measures identified in the approval conditions.				
Statement of Commitments	Timing													
<ul style="list-style-type: none">Operational environment management plan incorporating:<ul style="list-style-type: none">An Air Quality Management Plan.A waste management plan in accordance with the EPA Environmental Guideline: Assessment, Classification and Management of Liquid and Non-Liquid Waste (2004 edition).Mitigation and management measures identified in this EA and any subsequent approval conditions as issued by the SPC.	Update existing Terminal OEMP													
G87	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Traffic	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Appropriate signage / delineation and linemarking should be provided for the proposed central right-turn lane from simplest Road into Friendship Road, prior to Stage 2 operations. This is required to reinforce the route / travel path for road tankers approaching the site, separate unrelated traffic movements (i.e., Vopak traffic from through traffic) and reduce lane changes.Provide a warning sign to be located on the bend at the southern end of Friendship Road to advise northbound vehicles travelling around the corner to be aware of cars reversing out of the proposed southern end parking spaces.It is recommended that a road safety audit be undertaken on any proposed road amendments and site access arrangements.</td><td><div>Before Stage 2 operations</div><div>Before and during construction. During operations</div></td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Appropriate signage / delineation and linemarking should be provided for the proposed central right-turn lane from simplest Road into Friendship Road, prior to Stage 2 operations. This is required to reinforce the route / travel path for road tankers approaching the site, separate unrelated traffic movements (i.e., Vopak traffic from through traffic) and reduce lane changes.Provide a warning sign to be located on the bend at the southern end of Friendship Road to advise northbound vehicles travelling around the corner to be aware of cars reversing out of the proposed southern end parking spaces.It is recommended that a road safety audit be undertaken on any proposed road amendments and site access arrangements.	<div>Before Stage 2 operations</div> <div>Before and during construction. During operations</div>	Mod2 construction has not commenced yet. This condition is non-triggered					
Statement of Commitments	Timing													
<ul style="list-style-type: none">Appropriate signage / delineation and linemarking should be provided for the proposed central right-turn lane from simplest Road into Friendship Road, prior to Stage 2 operations. This is required to reinforce the route / travel path for road tankers approaching the site, separate unrelated traffic movements (i.e., Vopak traffic from through traffic) and reduce lane changes.Provide a warning sign to be located on the bend at the southern end of Friendship Road to advise northbound vehicles travelling around the corner to be aware of cars reversing out of the proposed southern end parking spaces.It is recommended that a road safety audit be undertaken on any proposed road amendments and site access arrangements.	<div>Before Stage 2 operations</div> <div>Before and during construction. During operations</div>													
G88	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Hazards & Risks	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">The proposal will be reviewed via the HAZOP methodologyEffective procedures be developed for adequate containment and disposal of ethanol spills in the unloading bay given that it is soluble in water and there exists the possibility of off-site impact via water / ethanol releases</td><td><div>Before construction</div><div>Before operation</div></td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">The proposal will be reviewed via the HAZOP methodologyEffective procedures be developed for adequate containment and disposal of ethanol spills in the unloading bay given that it is soluble in water and there exists the possibility of off-site impact via water / ethanol releases	<div>Before construction</div> <div>Before operation</div>	Mod2 construction has not commenced yet. This condition pertaining HAZOP is non-triggered. However for ethanol, the following record was sighted: - Stormwater Management Plan (20 July 2021) states that "any sump where product leak is suspected from ethanol pipeline or tank is to be quarantined until full assessment is carried out". " Vopak also advised; if sump is unsuitable for WWTP, the stormwater must not be discharged and manager will be contacted". - ENABLON incident register did not indicate ethanol spills. It is noted that there were about 28 blank lines in the incident register. It is also noted that previously these lines were identified as B1 to B3 location. In the newer Incident register locations were also deleted.	Recommendation: Vopak should consider providing Stormwater Management Plan as an OEMP sub-plan.				
Statement of Commitments	Timing													
<ul style="list-style-type: none">The proposal will be reviewed via the HAZOP methodologyEffective procedures be developed for adequate containment and disposal of ethanol spills in the unloading bay given that it is soluble in water and there exists the possibility of off-site impact via water / ethanol releases	<div>Before construction</div> <div>Before operation</div>													
G89	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Hazards & Risks	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Review radiant heat protection for the new Amenities building, particularly if it serves critical functions during an emergency, due to the radiant heat received from a bund fire for Tank Tk 0726.The QRA is intended primarily as a risk profile comparing the current and proposed expansion cases against HIPAP 4 criteria. While the QRA identifies existing risk control measures and safeguards, it does not provide a detailed demonstration of the adequacy of the control measures in place to control risks to levels considered "As Low As Reasonably Practicable" (ALARP). This demonstration will be included as an update to the MHF Safety Report. Hence no specific recommendations have been made as part of the QRA.</td><td><div>Before construction</div><div>Before construction</div></td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Review radiant heat protection for the new Amenities building, particularly if it serves critical functions during an emergency, due to the radiant heat received from a bund fire for Tank Tk 0726.The QRA is intended primarily as a risk profile comparing the current and proposed expansion cases against HIPAP 4 criteria. While the QRA identifies existing risk control measures and safeguards, it does not provide a detailed demonstration of the adequacy of the control measures in place to control risks to levels considered "As Low As Reasonably Practicable" (ALARP). This demonstration will be included as an update to the MHF Safety Report. Hence no specific recommendations have been made as part of the QRA.	<div>Before construction</div> <div>Before construction</div>	This is not relevant for Operational IEA.					
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G90	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Air Quality	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Trenching and pipe laying would be undertaken progressively along the route to minimise the area that is disturbed at any single point in timeDisturbed surfaces would be stabilised as soon as practicableEquipment to be well maintained and limit instances of fuel combustion processesWhere material stockpiles are necessary, the stockpile would be covered or watered down to prevent movement and disturbances from wind.</td><td><div>During construction</div><div>During construction</div><div>During construction</div><div>During construction</div></td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Trenching and pipe laying would be undertaken progressively along the route to minimise the area that is disturbed at any single point in timeDisturbed surfaces would be stabilised as soon as practicableEquipment to be well maintained and limit instances of fuel combustion processesWhere material stockpiles are necessary, the stockpile would be covered or watered down to prevent movement and disturbances from wind.	<div>During construction</div> <div>During construction</div> <div>During construction</div> <div>During construction</div>	This is not relevant for Operational IEA.					
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G91	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Air Quality	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Vopak commits to investigating and if practicable implementing benzene reduction opportunities as required under an EPL pollution reduction program for the project.</td><td>During operations</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Vopak commits to investigating and if practicable implementing benzene reduction opportunities as required under an EPL pollution reduction program for the project.	During operations	Interview: - Vopak (AB) stated that the site is improving the internal floating roof (IFR) continuously as every year the site replace 2-3 tanks IFR. When IFR is replaced, site also ensure there is secondary seal for the IFR. In 2024 there were 4 tanks IFR replaced. Record sighted: - Annual return 2023-2024 shows 763 kg Benzene emission compared to 823 kg in 2022-2023 annual return. - Vopak (October 2023) The Budget Book 2024 stated that since 2022 there has been 2.4 tonnes reduction in VOC emission. - Tank inspection report.								
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Statement of Commitments	Timing																
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Statement of Commitments	Timing												
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Statement of Commitments	Timing												
<ul style="list-style-type: none">All worksites to be left clean and tidy and the contractor shall maintain the site in an orderly manner	During and after construction												
G99	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Visual	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Construction works would be completed within the shortest possible timeframeAll work equipment and materials would be contained within the designated boundaries of the work site</td><td>During construction During construction</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Construction works would be completed within the shortest possible timeframeAll work equipment and materials would be contained within the designated boundaries of the work site	During construction During construction	This is not relevant for Operational IEA.				
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G100	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Visual	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">On completion of the works all equipment, materials and refuse relating to construction of the works would be removed from the work areas</td><td>During and after construction</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">On completion of the works all equipment, materials and refuse relating to construction of the works would be removed from the work areas	During and after construction	Expansion in Mod 2 is not built yet, thus this is not yet triggered.				
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G102	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Topography, Geology and Soils	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">Disturbed areas would be stabilised as soon as possible following completion of works</td><td>During and after construction</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">Disturbed areas would be stabilised as soon as possible following completion of works	During and after construction	Expansion in Mod 2 is not built yet, thus this is not yet triggered				
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Statement of Commitments	Timing														
<ul style="list-style-type: none">In the event that contaminated groundwater is discovered, a groundwater management plan would be developed by Vopak Environmental Consultants	If required														
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G107	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Topography, Geology and Soils	<table><tr><th>Statement of Commitments</th><th>Timing</th></tr><tr><td><ul style="list-style-type: none">The proposal is located within GMZ A and GMZ B. Vopak will be required to submit to the NSW Ports details as required by the Groundwater Management Zone Deed, May 1994 including:<ul style="list-style-type: none">Proposed construction methodsThe likely impact of the water tableThe likely impact on the LPG storage developmentA letter to the effect that the applicant agrees to submit any dispute regarding the submissions to arbitration in accordance with Clause 4.8 of the Deed.During operations groundwater monitoring would continue to be undertaken in accordance with the conditions of the EPL.</td><td>Before construction</td></tr></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">The proposal is located within GMZ A and GMZ B. Vopak will be required to submit to the NSW Ports details as required by the Groundwater Management Zone Deed, May 1994 including:<ul style="list-style-type: none">Proposed construction methodsThe likely impact of the water tableThe likely impact on the LPG storage developmentA letter to the effect that the applicant agrees to submit any dispute regarding the submissions to arbitration in accordance with Clause 4.8 of the Deed.During operations groundwater monitoring would continue to be undertaken in accordance with the conditions of the EPL.	Before construction	Expansion in Mod 2 is not built yet, thus the first bullet point is not yet triggered Interview and record sighted previously: - Geosyntec (2024) report presents a groundwater monitoring that is part of biannual monitoring. - Vopak (AB) stated that the groundwater monitoring is ongoing.						
Statement of Commitments	Timing														
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G109	MP06_0089 Mod 2 applicable to B1, B2, and B3. This is also a duplicate of all requirements under EA (2016)	Appendix 2	Waste minimisation and management	<table><thead><tr><th>Statement of Commitments</th><th>Timing</th></tr></thead><tbody><tr><td><ul style="list-style-type: none">A sufficient number of suitable receptacles for general waste and recyclable materials would be provided for waste disposal on site, including sufficient bins to allow separation of wastes for recycling and conform with EPA guidelines for construction waste</td><td>Before construction</td></tr></tbody></table>	Statement of Commitments	Timing	<ul style="list-style-type: none">A sufficient number of suitable receptacles for general waste and recyclable materials would be provided for waste disposal on site, including sufficient bins to allow separation of wastes for recycling and conform with EPA guidelines for construction waste	Before construction	This is not relevant for Operational IEA.								
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Statement of Commitments	Timing																
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APPENDIX 3: Incident Notification and Reporting Requirements										
G114	MP06_0089 Mod 2 applicable to B1, B2, and B3	Appendix 3-	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7, schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.	Interview: - Vopak (AB) stated that no incident requiring notification to Department has occurred. The Auditor sighted the Enablon incident register, which did not show the presence of incident of material harm.					
G115	MP06_0089 Mod 2 applicable to B1, B2, and B3	Appendix 3-	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	Written notification of an incident must: a. identify the development and application number; b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c. identify how the incident was detected; d. identify when the applicant became aware of the incident; e. identify any actual or potential non-compliance with conditions of consent; f. describe what immediate steps were taken in relation to the incident; g. identify further action(s) that will be taken in relation to the incident; and h. identify a project contact for further communication regarding the incident.	Interview: - Vopak (AB) stated that no incident requiring notification to Department has occurred. The Auditor sighted the Enablon incident register, which did not show the presence of incident of material harm.					
G116	MP06_0089 Mod 2 applicable to B1, B2, and B3	Appendix 3-	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Interview: - Vopak (AB) stated that no incident requiring notification to Department has occurred. The Auditor sighted the Enablon incident register, which did not show the presence of incident of material harm.					
G117	MP06_0089 Mod 2 applicable to B1, B2, and B3	Appendix 3-	WRITTEN INCIDENT NOTIFICATION REQUIREMENTS	The Incident Report must include: a. a summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident.	Interview: - Vopak (AB) stated that no incident requiring notification to Department has occurred. The Auditor sighted the Enablon incident register, which did not show the presence of incident of material harm.					
State Significant Development (SSD 7000) (Applicable to B4A)										
SSD Part A Administrative Conditions										
G118	SSD 7000 applicable to B4	A1	Obligation to Minimise Harm to the Environment	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction or operation of the Development.	Based on review of environmental performance and the implementation of the CEMP and OEMP, the Auditor considers that Vopak has implemented all reasonable and feasible measures to prevent and/or minimise harm to the environment. These include (but not limited to): - Bunds around tanks and associated alarm for level detection - Stormwater treatment and procedure for testing and recycling of stormwater.					
G119	SSD 7000 applicable to B4	A2	Terms of Consent	The Applicant shall carry out the Development in accordance with: (a) State Significant Development Application SSD 7000; (b) EIS; (c) RTS; (d) the plans and drawings located at Appendix 1; and (e) the Management and Mitigation Measures located at Appendix 2.	Based on review by the Auditor, the Applicant carried out the Development to address requirements of the items listed. Non-compliances with respect to each condition are listed in the relevant items below.					
G120	SSD 7000 applicable to B4	A3	Terms of Consent	If there is any inconsistency between the plans and documentation referred to in Condition A2 above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency.	Condition noted. The Auditor has requested most recent reports.					
G121	SSD 7000 applicable to B4	A4	Terms of Consent	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this consent; and	Interview: - Vopak (AB) states that they are using the current OEMP internally until submitted to DPHI. Record sighted: - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024. - Submission of OEMP were unable to be sighted.	Evidence of submission of Final OEMP to DPHI (which is due on 31 Oct 2024) will be sighted in the next Audit.				
				(b) the implementation of any actions or measures contained within these reports, plans or correspondence.						
G122	SSD 7000 applicable to B4	A5	Limits Of Consent	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under Section 95 of the Act.	The construction for site B4A has been completed at the time of Audit.					
G123	SSD 7000 applicable to B4	A6	Limits Of Consent	The Applicant shall ensure that bulk liquids are only imported and exported via pipeline and are not dispatched by road vehicles directly from the site. <i>Note: This condition does not give approval to an increase in bulk liquids throughput from Site B (via road) associated with project approval MP 06_0089.</i>	Interview: - Vopak (AB) states that bulk liquids are exported via pipeline and are not dispatched by road vehicles. Pipelines observed between B4A to site B1.					

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G124	SSD 7000 applicable to B4	A7	Statutory Requirements	The Applicant shall ensure that all licences, permits and approvals are obtained and kept up to date as required throughout the life of the Development. No condition of this consent removes the obligation of the Applicant to obtain, renew or comply with such licences, permits or approvals.	Record sighted: - EPL6007. - Port Botany Licence Pipe Licence (6/12/2021) (which is due 30 March 2025). - Port Botany Licence BLB1 Licence (29//3/2021) (no expiry date provided). - Port Botany Licence BLB1 Licence (19/9/2013) (no expiry date provided).				
G125	SSD 7000 applicable to B4	A8	Structural Adequacy	The Applicant shall ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the Building Code of Australia (BCA). <i>Note:</i> • <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i> • <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.</i>	This item is not considered triggered for operational phase. Record sighted previously: - McKenzie Group (5 November 2021) Completion Statement No. 202856/01, stating that the completed works are generally in accordance with the relevant BCA.				
G126	SSD 7000 applicable to B4	A9	Staged Submission Of Plans And Programs	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or	Record sighted - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024. Record sighted previously: NSW DPIE Letter dated 4 October 2019 providing approval to stage the submission of plans and programs.	Evidence of submission of Final OEMP to DPHI (which is due on 31 Oct 2024) will be sighted in the next Audit.			
				(b) combine any strategy, plan or program required by this consent.	None of the strategies, plans or programs have been combined.				
G127	SSD 7000 applicable to B4	A10	Evidence Of Consultation	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the Certifying Authority for approval, where required;	Assessed in relevant items in the SSD below (SSD Items B2, B3, B4, B14, B18)				
				(b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and	No additional consultation requirement identified during the current audit. Record sighted previously: - Email correspondence with Council (9 December 2019) providing acceptance of CTMP - Letter form DPIE (10 February 2020) providing acceptance of CTMP - Evidence of consultation sighted for SSD Items B2, B3, B4, B14, B18.				
				(c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.	Interview: - Vopak (AB) stated that there was no outstanding issues were raised by DPHI.				
G128	SSD 7000 applicable to B4	A11	Utilities and Services	Utilities, services and other infrastructure potentially affected by the construction and operation of the Development shall be identified prior to construction to determine requirements for access to, diversion, protection, and/or support. Consultation with the relevant owner and/or provider of services that are likely to be affected by the Development shall be undertaken to make suitable arrangements for access to, diversion, protection, and/or support of the affected infrastructure as required. The cost of any such arrangements shall be borne by the Applicant.	This item is considered non-triggered for the current audit as there is no additional construction since the previous audit.				
SSD Part B Environmental Performance									
G129	SSD 7000 applicable to B4	B1	Hazard And Risk	The Applicant shall: (a) implement all control measures proposed in the PHA;	Interview: - Only a small HAZOP audit was done for Site B4 for a Stadis additives dosing system in Site B (including Site B4), but this item is not implemented yet. A HAZOP for combined plant will be conducted in 2025. Record sighted: - Sherpa (22/11/2023) Additives Site Modification. - Sherpa (2020) Final Hazard Analysis. Record sighted previously: - B4A HAZOP 2019 in Enablon, which provides 88 items raised. The status of the approval for all items are "Completed". Vopak (MB) states that the items were checked and validated by an approver.	Recommendation: A HAZOP Audit is to be completed to ensure all control measures proposed in the PHA are completed.			
				(b) implement all actions in response to the recommendations from the Buncefield incident investigation report as listed in Appendix A of the PHA; and	Record sighted: - Sherpa (2020) Final Hazard Analysis.				
				(c) implement all recommendations of the PHA.	Interview: - Only a small HAZOP audit was done for Site B4 for a Stadis additives dosing system in Site B (including Site B4), but this item is not implemented yet. A HAZOP for combined plant will be conducted in 2025. Record sighted: - Sherpa (22/11/2023) Additives Site Modification. - Sherpa (2020) Final Hazard Analysis. Record sighted previously: - B4A HAZOP 2019 in Enablon, which provides 88 items raised. The status of the approval for all items are "Completed". Vopak (MB) states that the items were checked and validated by an approver.				

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G130	SSD 7000 applicable to B4	B2	Hazard And Risk	Prior to the completion of detailed design of the Development, or within such further period as the Secretary may agree, the Applicant shall prepare a Surge Study for the Development. The Study shall: (a) be prepared in consultation with SafeWork NSW prior to commencement of the study;	This item is not considered triggered for the operational audit. Record sighted previously: - Fitzroy Engineering (2020) Pressure Surge Study - Vopak (6 February 2020) Vopak B4A Expansion Project ("Project"), SSD 7000 - Surge Study to WorkSafe NSW.				
				(b) take into account the maximum pumping and tank filling rates when evaluating the pressures that can occur in the pipeline in a surge scenario; and	This item is not considered triggered for the operational audit. Record sighted previously: - Fitzroy Engineering (2020) Pressure Surge Study, which contains this information.				
				(c) evaluate the controls such as valve closing times and pressure rating of pipes and related equipment. The findings of the Surge Study shall be included in the Final Hazard Analysis (FHA) under Condition B4(d).	This item is not considered triggered for the operational audit. Record sighted previously: - Fitzroy Engineering (2020) Pressure Surge Study, which contains this information. - Sherpa (27 February 2020) Vopak B4A Expansion Project Port Botany Condition of Consent Study Final Hazard Analysis.				
G131	SSD 7000 applicable to B4	B3	Hazard And Risk	Prior to finalising the detailed design of the Development, the Applicant shall consult with SafeWork NSW regarding any requirements under the Work Health and Safety Act 2011 and Work Health and Safety Regulation 2011.	This item is not considered triggered for the operational audit. Record sighted previously: - Vopak (6 February 2020) Vopak B4A Expansion Project ("Project"), SSD 7000 - Surge Study to WorkSafe NSW.				
G132	SSD 7000 applicable to B4	B4	Pre- construction	At least one month prior to the commencement of construction of the Development (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Secretary may agree, the Applicant shall prepare and submit for the approval of the Secretary, the studies set out under subsections (a) to (d) (the pre-construction studies) of this condition. Construction, other than of preliminary works, shall not commence until approval has been given by the Secretary and, with respect to the Fire Safety Study, approval has also been given by Fire and Rescue NSW (FRNSW). (a) CONSTRUCTION SAFETY STUDY A Construction Safety Study, consistent with the Department's Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety'. For developments in which the construction period exceeds six (6) months, the commissioning portion of the Construction Safety Study may be submitted two months prior to the commencement of commissioning of each discrete component/system of the Development as per the Development's commissioning plan (e.g. individual tank systems). The Construction Safety Study shall identify and assess construction and demolition related hazards and the control measures that will be put in place to prevent and/or mitigate such hazards.	This item is not considered triggered for the operational audit. Record sighted previously: - Construction Safety Study approval letter by Secretary Delegate, dated 17 September 2019				
				(b) FIRE SAFETY STUDY An update of the Fire Safety Study (FSS) for Site B, titled Vopak B3 Expansion Project, Port Botany – Fire Safety Study, Rev 0, prepared by Sherpa Consulting and dated August 2009 to include the Development. Prior to the commencement of each stage of the Development, this study shall be updated and submitted to the Secretary and FRNSW for their respective approval. The study shall cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's 'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'. The FSS shall be developed in consultation with FRNSW. The FSS shall also address the following: (i) the scope of the FSS should at least include the following: • the proposed increased discharge rates from bulk liquids berth (BLB) 1 and BLB 2; and • interfacing of services with the existing Site B arising as a consequence of the Development; (ii) the recommended fire protection control measures arising from the FSS analysis be developed from first principle evaluation; (iii) if the Development is staged, the FSS for the first stage shall consider the requirements of the Fire detection/protection systems for the entire Development; and (iv) the analysis of required fire protection systems includes substantiation of effective and timely system initiation/activation with regard to the number of on-site personnel available at all hours of business operations.	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation in previous audit on approval of Fire & Rescue NSW on the Fire Safety Study. Record sighted: - Fire & Rescue NSW (2 June 2020) Fire Safety Study Vopak B4A Expansion Project Port Botany. - Vopak (27 March 2023) Vopak Site B Port Botany 2023 Hazard Audit. Record sighted previously: - Sherpa (2019) Fire Safety Study - Fire Safety Study and Final Hazard Assessment approval letter by Secretary Delegate, dated 24 June 2020. - Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Emergency Plan is completed. - Fire & Rescue NSW (2 June 2020) Fire Safety Study Vopak B4A Expansion Project Port Botany, which provides review outcomes of the FSS and states that two items need amendments.				
				(c) HAZARD AND OPERABILITY STUDY A Hazard and Operability Study (HAZOP) for the Development and the pipeline from the berths to Site B, chaired by a qualified person who is independent of the Development and approved by the Secretary prior to the commencement of the study. In addition, the following shall be covered in the HAZOP study: (i) surge issues due to an increase in pumping rates; and (ii) the ullage allowance above the high alarm/ESD level, taking into account the slow closing time of the ESD valves; and (iii) the study shall be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 8, 'HAZOP Guidelines'. The study report must be accompanied by a program for the implementation of all recommendations made in the report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	Record sighted previously:: - Vopak (2019) HAZOP Report - Fitzroy Engineering (2020) Pressure Surge Study - NSW DPIE (16/1/2020) Vopak Site B Bulk Fuel Storage Terminal, Port Botany (SSD 7000) - HAZOP Study for Stage B4A Diesel Storage Tanks, which provides the HAZOP study. - Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Emergency Plan is completed.				

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G133	SSD 7000 applicable to B4	B4	Pre-construction	(d) FINAL HAZARD ANALYSIS A Final Hazard Analysis (FHA) of the site, consistent with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'. The FHA shall report on the implementation of the recommendations of the PHA. The FHA also shall: (i) demonstrate that the tank overfill protection system (for all tanks) reduces the risk so far as reasonably practicable. The following shall be included as part of this demonstration requirement: • a sample bow-tie analysis of the tank overfill protection system; and • the safety integrity level (SIL) allocation and verification report for the Development, in particular the tank overfill protection system and rim seal fire detection; (ii) re-evaluate and confirm all relevant data and assumptions from the PHA, in particular, the outcomes of the surge analysis that may result in changes in the risk assessment; (iii) re-evaluate and confirm all control measures proposed for the prevention and mitigation of incidents; and (iv) report on implementation of the recommendations of the PHA.	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation from the previous audit requiring resubmission of FSS to the Planning Secretary. Record sighted: - Submission of FSS in Major Portal (Ref: SSD-7000-PA-12). The status is closed. Record sighted previously: - Sherpa (2020) Final Hazard Assessment - Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Emergency Plan is completed. - Fire Safety Study and Final Hazard Assessment approval letter by Secretary Delegate, dated 24 June 2020. Letter from Secretary dated 24 June 2020 states that the following is required: 1. submitting the updated FSS for Stage B4A (revision 1) no later than two months prior to commencement of commissioning of Stage B4A. This updated FSS must: a. include the updates and recommendations in Fire and Rescue NSW's conditional approval of the FSS dated 2 June 2020; b. address all items in the Department's queries on the FSS of 25 March 2020; c. report on changes between the preliminary and final design of Stage B4A; and d. be consistent with the updates on the FSS outlined in your e-mail of 9 June 2020; and 2. implementing all safeguards, actions and recommendations from the FSS in a timely manner. In reviewing the FHA, the Department is satisfied that the FHA has been performed and reported in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis' and considered the relevant requirements under Condition B4(d). As such, the FHA is approved for works up to and including Stage B4A in accordance with the condition, subject to Vopak implementing all safeguards, actions and recommendations from the FHA in a timely manner.				
G134	SSD 7000 applicable to B4	B5	Pre-Commissioning	The Applicant shall develop and implement the plans and systems set out under subsections (a) to (b) of this Condition. No later than two months prior to the commencement of commissioning of the Development, or within such further period as the Secretary may agree, the Applicant shall submit, for the approval of the Secretary, documentation describing those plans and systems. Commissioning shall not commence until approval has been given by the Secretary. (a) EMERGENCY PLAN A comprehensive Emergency Plan and detailed emergency procedures for the Development. This plan shall include consideration of the safety of all people outside of the development who may be at risk from the development. The plan shall be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'. The plan shall include interim emergency management arrangements (if any) which may be introduced between the commencement of commissioning and reaching end-state terminal operations.	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation from the previous audit requiring approval of Emergency Plan from Planning Secretary. Record sighted: - Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Emergency Plan is completed. - Submission to DPIE by email on 29/10/2021, noting that evidence of approval has not been sighted. - Evidence of Emergency Plan approval from Secretary was unable to be sighted.	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation from the previous audit requiring approval of Emergency Plan from Planning Secretary. This item has been considered as compliant as the plan has been submitted to DPIE in 2021, but evidence of approval has not been obtained. Recommendation: The approval for the Emergency Plan should be obtained from the Planning Secretary, if it has not been obtained.			
				(b) SAFETY MANAGEMENT SYSTEM An update of the Safety Management System (SMS) that covers the development and Site B operations. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records supporting the SMS shall be kept on-site and shall be available for inspection by the Secretary upon request. The Safety Management System shall be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'. An inspection, testing and preventive maintenance program shall be developed, implemented and maintained to ensure the reliability and availability of the key safety critical equipment is, at a minimum, consistent with the data estimated in the PHA.	While this information was not considered applicable for the operational phase, this was reviewed as there was an outstanding recommendation from the previous audit requiring approval of Safety Management System from Planning Secretary. Record sighted: - Submission of FSS in Major Portal (Ref: SSD-7000-PA-11). The status is closed. Record sighted previously: - Sherpa (29 October 2021) Technical Note Pre-Startup Compliance Report, Status Report - Hazard Study Conditions of Consent, which states that the Safety Management System is completed. - Submission to DPIE by email on 29/10/2021, noting that evidence of approval has not been sighted.				
G135	SSD 7000 applicable to B4	B6	Pre-startup	PRE-STARTUP COMPLIANCE REPORT One month prior to the commencement of operation of each asset or system covered by this consent, the Applicant shall submit to the Secretary, a report detailing compliance with Conditions B1 to B5, including: (a) dates of study/plan/system submission, approval, commencement of construction and commissioning; (b) actions taken or proposed, to implement the recommendations and safety-related control measures in the studies/plans/systems; (c) a pre-startup safety review/checklist; and (d) responses to each requirement imposed by the Secretary under Condition B9 of this Schedule.	Not triggered for the current audit. This was reviewed in previous audit.				

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G136	SSD 7000 applicable to B4	B7	Post-startup	POST-STARTUP COMPLIANCE REPORT Three months after the commencement of operation of the first asset or system covered by this consent, the Applicant shall submit to the Secretary, a report verifying that: (a) the Emergency Plan required under Condition B5(a) is effectively in place and that at least one emergency exercise has been conducted; and	Not triggered for the current audit. This was reviewed in previous audit.				
				(b) the Safety Management System required under Condition B5(b) has been fully implemented and that records required by the system are being kept.					
G137	SSD 7000 applicable to B4	B8	Ongoing	HAZARD AUDIT Twelve months after the commencement of operation of the Development and every three years thereafter, or at such intervals as the Secretary may agree, the Applicant shall carry out a comprehensive Hazard Audit of the Development and within one month of each audit submit a report to the Secretary. The audits shall be carried out at the Applicant's expense by a qualified person or team, independent of the Development, approved by the Secretary prior to commencement of each audit. Hazard Audits shall be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines' (HIPAP No. 5). The audit reports shall, in addition to the requirements provided in HIPAP No 5: (a) verify implementation of all actions proposed by the Applicant in response to the recommendations from the Buncefield incident investigation report as contained in the Appendix A of PHA;	Record sighted: - GHD (30 November 2022) Vopak B4A Expansion Project Port Botany 2022 Hazard Audit. - Approval of Audit team by Planning is provided in Appendix B of GHD report. - The HIPAP 5 audit questionnaire were completed and provided in GHD report Appendix C. - GHD states that Site B4A only contains diesel storage and not low flash point petroleum products such as ULP, or Jet Fuel, hence the Buncefield recommendations are not relevant to Stage – B4A and the diesel storage system. - Vopak (27 March 2023) Vopak Site B Port Botany 2023 Hazard Audit. There is no recommendation provided in the report. Hence, there is no submission of program for the implementation of recommendations to Planning Secretary. Noted that this Audit does not apply to B4A (SSD7000) as the report actually refer Site B as B1 to B3.	Hazard audits shall be completed at the site every three years as per SSD7000 condition B8 noting that the last Hazard audit report was dated 30 November 2022			
				(b) verify that an inspection, testing and preventative maintenance program has been developed, implemented and maintained to ensure the reliability and availability of key safety critical equipment;	Record sighted: - GHD (30 November 2022) Vopak B4A Expansion Project Port Botany 2022 Hazard Audit. Section 4. - ME2 Maintenance Management System, which provides records of maintenance. Record sighted: - ALS (22 February 2022) Vibration Analysis Report for Vopak Terminals - Port Botany, NSW, which provides maintenance recommendations. Based on the information by Vopak (MB), any recommendations will require preparation of WOOI (work order out of inspection), which will require action. This set of recommendations have not yet been actioned as they were recent.				
				(c) confirm that the throughput and storage quantities of potentially hazardous materials are consistent with the PHA; and	Record sighted : - The PHA provides S75W throughput (7.8 billion litres/year which is equal to the MP06_0089 Condition of 7,800,000m³). - Vopak throughput data for 1 July 2023-30 June 2024 for Site B1 to B4A, that was sent to NSW Port as part of the contract obligation, shows that there is a total of 3,668,867 metric tonnes imported and 3,673,933 metric tonnes exported from the site via ship/truck/pipeline (noting a density of approximately 0.75tonne/m3). The table shows that Site throughput for the year is below the amount stipulated in MP06_0089 Mod2 Schedule 2-9, even when all B1 to B4A sites are included.				
			Ongoing	(d) verify implementation of any measures arising from the reports submitted in respect of Conditions B1 to B7 of this Schedule. The audit report shall be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented. This audit report shall also be submitted to SafeWork NSW.	Record sighted: - SHE03B Process Safety & Environmental Risk Management (April 2023) Issue 5 Section 3.8 listed the following: 2015 B4A EIS, 2022 B4A Hazard Audit, 2021 B4A Fire Safety Study, 2024 B4A QRA, 2019 B4A HAZOP, 2020 B4A Final Hazard Analysis. - GHD (30 November 2022) Vopak B4A Expansion Project Port Botany 2022 Hazard Audit. Section 4, 5, and 7 address this Condition. - GHD Hazard Audit (30 November 2022) provided recommendations, which were addressed as follows: - Dangerous Goods (DG) notification was submitted by WorkSafe with the incorrect site address. - Process Safety & Environmental Risk Management (Doc. No. SHEC03B) is to include site B4 safety documentation. However, program for implementation of recommendation was unable to be sighted. Record sighted: - SafeWork NSW (12/2/2023) Acknowledgement of Notification of Hazardous Chemicals on Premises.				
G138	SSD 7000 applicable to B4	B9	Further Requirements	The Applicant shall comply with all reasonable requirements of the Secretary in respect of the implementation of any measures arising from the reports submitted in respect of Conditions B1 to B8 of this Schedule inclusive, within such time as the Secretary may agree.	Based on information provided by Vopak, there is no indication that there is requirement from the Secretary that has not been implemented by Vopak. However it is noted that the Secretary approval on the Emergency Plan is not yet obtained under Condition B5. This is assessed in Item G134.				
G139	SSD 7000 applicable to B4	B10	Air Quality Discharges	The Applicant shall install and operate equipment to ensure the Development complies with all load limits, air quality criteria and air quality monitoring requirements as specified in the EPL for the site.	There are no load limits, air quality criteria or air quality monitoring for site B4A. This item will be checked for B1-B3 and in assessment of EPL requirements.				

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G140	SSD 7000 applicable to B4	B11	Odour	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<p>Interview:</p> <p>- Vopak (AB) stated that there was no complaint regarding odour has been identified.</p> <p>Observation:</p> <p>- The Auditor observed chemical odour during the site observation at the boundary with Tyne, which appeared to be associated with Tyne operation.</p> <p>Record sighted:</p> <p>- Vopak incident report data that is claimed to be extracted from Enablon Incident Reporting system. This data provides incidents in site B1 to B4A during operation. The document shows there was no offensive odour from B4A under this SSD 7000. Incidents related to odour were only recorded for Site B1 to B3 (not under SSD 7000). Those incidents comprised isolated smell within the site, which were detailed as follows:</p> <p>- 30 Nov 2022 (at B1 to B3 sites): Operator noting smell from trailer hose that had spill. Load was then stopped and trailer taken for repairs.</p> <p>- 5 March 2024 (at B1 to B3 sites): Electrical smell in the North area of the building. Fire brigade stated that it was possibly caused by a burnt light transformer. Licensed electrician was scheduled to conduct further check the following day.</p> <p>The Auditor considers that the isolated smell recorded in the above reports were not considered significant odour emission that requires notification.</p>				
G141	SSD 7000 applicable to B4	B12	Dust Management	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.	<p>Observation:</p> <p>- The Auditor did not observe any unacceptable dust during site visit.</p> <p>Record sighted :</p> <p>- Vopak incident report data that is extracted from Enablon Incident Reporting system. This data provides incidents in site B1 to B4A during operation.</p> <p>- No record of incident relating to dust, that was originated from the site.</p>				
G142	SSD 7000 applicable to B4	B13	Dust Management	During construction and operation of the Development, the Applicant shall ensure that: (a) all vehicles on-site do not exceed a speed limit of 20 kilometres per hour;	<p>Observation:</p> <p>- No vehicle was observed entering or leaving the site at the time of Audit.</p> <p>Record sighted:</p> <p>- The 15km/hr speed limit signage was present at B4A front gate</p>				
				(b) all loaded vehicles entering or leaving the site have their loads covered;	<p>Observation:</p> <p>- No vehicle was observed entering or leaving the site at the time of Audit.</p>				
				(c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and	<p>Observation:</p> <p>- No vehicle was observed entering or leaving the site at the time of Audit.</p>				
				(d) all heavy vehicles on-site do not use engine brakes.	<p>Observation:</p> <p>- No vehicle was observed entering or leaving the site at the time of Audit.</p>				
G143	SSD 7000 applicable to B4	B14	Operational Air Quality Management Plan	Prior to the commencement of operation, the Applicant shall prepare an Air Quality Management Plan (AQMP) for the Development, to the satisfaction of the Secretary. The AQMP shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C7 and any other requirements of the EPL for the site. The AQMP shall: (a) be prepared in consultation with the EPA;	<p>Record sighted:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan.</p> <p>Interview:</p> <p>- Vopak (AB): AB in September 2024 believed OEMP must have been submitted to EPA when the EPL was varied in 2021 to include B4A. However, evidence of submission was unable to be sighted, noting there was change or responsible personnel in 2023 from MM to AB.</p> <p>- DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.</p>	<p>This condition is considered non-compliant from the last audit because, evidence of submission of the OEMP that includes the EMM Air Quality Management Plan was unable to be sighted.</p> <p>Recommendation: If not yet obtained, approval from the Secretary on the AQMP should be obtained. Considering there have been some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval.</p>			
				(b) detail and rank all emissions from all sources of the Development, including particulate and odour emissions;	<p>Record sighted:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan (Section 3).</p>				
				(c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;	<p>Record sighted previously:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan (Section 4).</p>				
				(d) nominate the following for each of the proposed controls: (i) key performance indicator; (ii) monitoring method; (iii) location, frequency and duration of monitoring; (iv) record keeping;	<p>Record sighted:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan (Section 6).</p>				
				(e) identify the control measures that will be implemented for each emission source; and	<p>Record sighted:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan (Section 5).</p>				
				(f) includes a complaints register, response procedures and compliance monitoring.	<p>Record sighted:</p> <p>- EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan (Section 6).</p>				

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G144	SSD 7000 applicable to B4	B15	Post-commissioning Air Emissions Verification	Within six months of the commencement of operation, the Applicant shall prepare a post-commissioning air emissions report to verify all major emission sources identified in the RTS associated with the development. The report shall:	This item was not available to be sighted and was also unable to be sighted in the previous audit.	This condition is considered non-compliant as the post-commissioning air emissions report was unable to be sighted during the current and previous audit. Recommendation: If not already conducted, Vopak should conduct a post-commissioning air emissions report as per the Condition B15. Evidence of this will need to be sighted in subsequent audit.			
				(a) be prepared by a suitably qualified and independent expert;					
				(b) be submitted to the EPA;					
				(c) include post commissioning sampling and speciation of VOC emissions from the storage tanks for the fuel types assessed in the RTS. Sampling is to be undertaken in accordance with the requirements specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW;					
				(d) include records of the operating capacity and process rate of the activity at the time of sampling; and					
				(e) include a comparison and analysis of the results of the post commissioning sampling with the modelled emissions in the RTS and demonstrate compliance with the ground level criteria in the Approved Methods for the Sampling and Analysis of Air Pollutants in NSW;					
G145	SSD 7000 applicable to B4	B16	Site Access, Internal Roads and Parking	The Applicant shall ensure:	Evidence for this Condition was unable to be sighted.	This condition is considered as non-compliant since the previous audit due to absence of evidence that shows internal roads, driveways and parking are constructed and maintained in accordance with the latest versions of AS 2890.1 & AS 2890.2 and the sweep path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS. Recommendation: If not yet obtained, a certificate for compliance must be obtained from a suitably qualified consultant to demonstrate that internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2. Evidence of this will be sighted in subsequent audit.			
				(a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2;	Evidence for this Condition was unable to be sighted.				
				(b) the sweep path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS;	Observation: - No queuing of vehicle was observed during the Audit (site visit). Record sighted: - Vopak provided operation incident register. Review of the Enablon complaint / incident register did not indicate any complaint relating to this.				
				(c) the Development does not result in any vehicles queuing on the public road network;	Observation: - No off site loading and unloading of materials was observed during the Audit (site visit). Record sighted: - Vopak provided operation incident register. Review of the Enablon complaint / incident register did not indicate any complaint relating to this.				
				(d) all loading and unloading of materials is carried out on site; and	Observation: - The turning areas were observed to be clear of obstacles during the Audit site visit. Record sighted: - Vopak provided operation incident register. Review of the Enablon complaint / incident register did not indicate any complaint relating to this.				
G146	SSD 7000 applicable to B4	B17	Culvert Works on Friendship Road	The Applicant shall ensure that any works on Friendship Road is undertaken in accordance with NSW Ports requirements.	Record sighted: - Email from NSW Ports (17/4/2024) RE: Stadis Dosing Config Upgrade - Vopak - Site B, stating that "all items have been addressed".				
G147	SSD 7000 applicable to B4	B18	Construction Traffic Management Plan	Prior to the commencement of construction, the Applicant shall prepare a Construction Traffic Management Plan (CTMP) for the Development in consultation with NSW Ports, Council and the RMS, and to the satisfaction of the Secretary. The plan shall form part of the CEMP Condition C1 and be prepared in accordance with Condition C7. The TMP shall:	This item is not applicable to Operational IEA.				
				(a) detail the measures that would be implemented to ensure road safety, network efficiency and access during construction;					
				(b) include the traffic controls to be implemented at the Friendship Road/Simblist Road intersection during the culvert construction works on Friendship Road;					
				(c) contain a drivers code of conduct to: (i) minimise the impacts of construction on the local and regional road network; and (ii) minimise conflicts with other road users;					
				(d) detail construction vehicle routes, number of trucks, access and parking arrangements; and					
				(e) if necessary, detail procedures for notifying any nearby residents of any potential disruptions to routes.					

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G148	SSD 7000 applicable to B4	B19	Hours of Work	<div>The Applicant shall comply with the construction and operation hours in Table 1, unless otherwise agreed by the Secretary.</div> <div>Table 1: Hours of Work</div> <table><tr><th>Activity</th><th>Day</th><th>Hours</th></tr><tr><td rowspan="3">Construction</td><td>Monday - Friday</td><td>7 am to 6 pm</td></tr><tr><td>Saturday</td><td>8 am to 1 pm</td></tr><tr><td>Sunday & Public Holidays</td><td>Nil</td></tr><tr><td>Operation</td><td>Monday to Sunday</td><td>24 hours</td></tr></table>	Activity	Day	Hours	Construction	Monday - Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Sunday & Public Holidays	Nil	Operation	Monday to Sunday	24 hours	<div>There is no limit for operation.</div> <div>The Auditor considers that the installation of an additional pipe within the culvert does not form a construction activity.</div>			
Activity	Day	Hours																			
Construction	Monday - Friday	7 am to 6 pm																			
	Saturday	8 am to 1 pm																			
	Sunday & Public Holidays	Nil																			
Operation	Monday to Sunday	24 hours																			
G149	SSD 7000 applicable to B4	B20	Hours of Work	<div>Construction outside of the hours identified in Condition B19, may be undertaken in the following circumstances:</div> <div>(a) works that are inaudible at the nearest sensitive receiver;</div> <div>(b) works agreed to in writing by the EPA or Secretary;</div> <div>(c) for the delivery of materials required outside these hours by the NSW Police or other authorities for safety reasons; or</div> <div>(d) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.</div>	<div>This is not relevant to the Operational IEA.</div> <div>The Auditor considers that the installation of an additional pipe within the culvert does not form a construction activity.</div>																
G150	SSD 7000 applicable to B4	B21	Construction Vibration	<div>The Applicant shall aim to achieve the following construction vibration goals:</div> <div>(a) for structural damage, the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration – effects of vibration on structures; and</div> <div>The Applicant shall aim to achieve the following construction vibration goals:</div> <div>(a) for structural damage, the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures; and</div> <div>(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: A technical Guideline (Department of Environment and Conservation, 2006).</div>	<div>Interview:</div> <div>- Vopak (AB) stated that the work conducted involved addition of one pipe within the existing pipeline culvert. No excavation work was required.</div>																
G151	SSD 7000 applicable to B4	B22	Noise Mitigation	<div>The Applicant shall implement best practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the Development.</div>	<div>Interview:</div> <div>- Vopak stated that no noise complaint has been identified.</div> <div>Observation:</div> <div>- No unacceptable noise was observed.</div>																
G152	SSD 7000 applicable to B4	B23	Water Licences	<div>The Applicant is required to obtain the necessary water licences for the Development under the Water Act 1912 and/or the Water Management Act 2000. If the development intercepts the groundwater table, a hydrogeological assessment shall be prepared to support any groundwater dewatering licence application.</div> <div>Note: Licences are required for groundwater bores, excavations that may intercept groundwater, dewatering activities and extraction or interception of surface water.</div>	<div>Interview:</div> <div>- Vopak (AB) stated that no dewatering was conducted during construction.</div>																
G153	SSD 7000 applicable to B4	B24	Surface Water Discharge Limits	<div>The Applicant shall ensure that all licensed surface water discharges from the site comply with the discharge limits (volume and quality) set for the Development in any EPL or relevant provisions of the POEO Act.</div>	<div>Record sighted:</div> <div>- Annual Return 2022-2023, which provides an exceedance for BOD, pH and TSS.</div> <div>- Annual Return 2023-2024, which indicated there was no exceedance.</div> <div>- DPHI site visit (30 August 2023) in relation to the non-compliances.</div> <div>- DPHI email following the site visit (13 and 21 September 2024) states that matter will be closed out with no further action.</div>																
G154	SSD 7000 applicable to B4	B25	Construction Soil and Water Management	<div>Soil and water management measures consistent with Managing Urban Stormwater - Soils and Construction Vol. 1 (Landcom, 2004) (the Blue Book) shall be employed during the construction of the Development to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.</div>	<div>This item is not considered applicable for operational stage.</div>																
G155	SSD 7000 applicable to B4	B26	Bunding and Storage of Liquids	<div>The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook.</div>	<div>Observation:</div> <div>- Chemicals and fuels were observed to be bunded.</div>																

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G156	SSD 7000 applicable to B4	B27	Water Management Plan	Prior to commencement of operation, the Applicant shall prepare a Water Management Plan (WMP) to the satisfaction of the Secretary. The WMP shall form part of the OEMP in Condition C4 and be prepared in accordance with Condition C7. The WMP shall: (a) be prepared in consultation with the EPA;	Record signed: - Vopak (23 June 2021) Water Management Plan (WMP) Vopak Site B4A. - Email correspondence with EPA regarding WMP (12, 23 and 24 August 2021) regarding a licence variation which related to some water management aspects e.g. monitoring wells etc - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.	This condition is considered as non-compliant since the previous audit as evidence of OEMP and sub-plans submission to DPHI and their approval was unable to be sighted. Recommendation: If not yet obtained, approval from the Secretary on the Water Management Plan should be obtained. Considering there are some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval.			
				(b) include mitigation measures for managing surface water, but not limited to the Management and Mitigation Measures in Appendix B; and	Record signed: - WMP (23 June 2021), including surface water management measures / monitoring in Sections 4 and 5 - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.				
				(c) contain a Surface Water Management Plan that: • describes the water management systems on site, including plans of the stormwater system and oily/water wastewater system; and • demonstrates compliance with any requirements of the EPL with respect to stormwater and wastewater management.	Record signed: - WMP (23 June 2021), including surface water management measures / monitoring (just not referred to as 'surface water management plan') in Sections 4 and 5, which includes oily water systems ('slops') plans and demonstrate compliance with the EPL - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.				
G157	SSD 7000 applicable to B4	B28	Waste Management - Classification	The Applicant shall ensure that any waste generated on the site is classified in accordance with the EPA's Waste Classification Guidelines (DECCW, 2009) or any superseding document and disposed of to a facility that may lawfully accept the waste.	Interview: - Vopak (AB) stated that no waste has been disposed offsite from Site B4A.				
G158	SSD 7000 applicable to B4	B29	Waste Management	For the life of the Development, the Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste generated on site by the Development; and (b) ensure that any waste generated by the Development is appropriately stored, handled and disposed of.	Interview: - Vopak (AB) stated that no waste has been disposed offsite from Site B4A. All waste is handled through slop tank in Site B1-B3.				
					Interview: - Vopak (AB) stated that no waste has been disposed offsite from Site B4A. All waste is handled through slop tank in Site B1-B3.				
G159	SSD 7000 applicable to B4	B30	External Lighting	All external lighting associated with the Development shall be mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadways. The lighting shall be the minimum level of illumination necessary and shall comply with Australian Standard AS4282 1997 – Control of the Obtrusive Effects of Outdoor Lighting.	Interview: No complaints have been recorded on lighting.				
SSD Part C Environmental Management, Reporting And Auditing									
G160	SSD 7000 applicable to B4	C1	Construction Environmental Management Plan	The Applicant shall prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary. The Plan shall: (a) be approved by the Secretary prior to the commencement of construction; (b) be prepared by a suitably qualified and experienced person;	This item is not considered applicable for operational stage. The Auditor considers that the installation of an additional pipe within the culvert does not form a construction activity.				
				(c) identify the statutory approvals that apply to the Development;					
				(d) outline all environmental management practices and procedures to be followed during construction works associated with the Development;					
				(e) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages;					
				(f) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts;					
				(g) describe the roles and responsibilities for all relevant employees involved in construction works associated with the Development; and					
				(h) include the management plans under Condition C2 of this consent.					
G161	SSD 7000 applicable to B4	C2	Construction Environmental Management Plan	As part of the CEMP for the Development, required under condition C1 of this consent, the Applicant shall include the following: (a) Dust Management; (b) Construction Traffic Management;	This item is not considered applicable for operational stage.				
				(c) Noise and Vibration Management;					
				(d) Construction Soil and Water Management;					
				(e) Waste Management; and					
				(f) community consultation and complaints handling procedure.					

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G162	SSD 7000 applicable to B4	C3	Construction Environmental Management Plan	The Applicant shall carry out the construction of the Development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time).	This item is not considered applicable for operational stage.				
G163	SSD 7000 applicable to B4	C4	Operational Environmental Management Plan	The Applicant shall prepare an Operational Environmental Management Plan (OEMP) for the Development to the satisfaction of the Secretary. The Plan shall: (a) be approved by the Secretary prior to the commencement of operation; (b) be prepared by a suitably qualified and experienced person; (c) outline the environmental impacts, environmental safeguards and management controls, monitoring measures and reporting measures of the Development; (d) include the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; and (v) respond to emergencies.	Record sighted previously: - Email from Major Projects on 2 July 2022 confirming receipt of the OEMP. - Comments from DPE on OEMP. In this Audit, the OEMP have been revised: - Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.	This condition is considered non-compliant because the approval of OEMP was unable to be sighted. Recommendation: OEMP approval should be obtained to meet Condition C4 of SSD consent.			
G164	SSD 7000 applicable to B4	C5	Operational Environmental Management Plan	As part of the OEMP for the Development, required under Condition C4 of this consent, the Applicant shall include the following: (a) Air Quality;	Record sighted: - Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A, which includes Air Quality Management Plan (EMM (June 2021) Vopak Port Botany Project: Site B Expansion Stage B4A Air Quality Management Plan)	Recommendation: An Updated OEMP with Waste Management Plan should be finalised and provided to DPHI. Waste Management Plan should make reference to NSW Waste Classification Guidelines and should include mitigation and management measures identified in the approval conditions.			
				(b) Soil and Water; and (c) Waste Management.	Record sighted : - Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A, which states that no routine waste is expected from site B4A (Section 5.2), noting Section 5.3 provides disposal of wastewater. - Waste Management Plan Vopak Sydney (27 August 2021) Rev 6 reviewed on 9 November 2021				
G165	SSD 7000 applicable to B4	C6	Operational Environmental Management Plan	The Applicant shall operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time).	Interview: - Vopak (AB) confirmed that the existing OEMP (September 2024) is currently implemented, but noting this is pending approval from DPE (see below). - DPHI RFI (Case ID . MP 06_0089-PA-3 dated 31 July 2023) regarding submission of OEMP for SSD 7000 can not progress as document was mistakenly submitted under MP 06_0089 instead of SSD 7000. Hence DPHI requested to resubmit the OEMP to SSD 7000 file instead. Due date for the requested action is 31 October 2024.	The OEMP has not been approved by DPHI as the submission of OEMP went to MP06_0089 portal instead of SSD 7000. Recommendation: The revised OEMP must be submitted to DPHI for approval by 31 October 2024.			
G166	SSD 7000 applicable to B4	C7	Management Requirements	The Applicant shall ensure that the environmental management plans required under Condition C1 and C4 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data; (b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Development over time; (g) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.	Record sighted: - Vopak (September 2024) Operational Environmental Management Plan, Vopak Site B and B4A.				

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G167	SSD 7000 applicable to B4	C8	Revision of Strategies, Plans and Programs	Within 3 months of: (a) an incident report submitted under Condition C9; (b) an audit submitted under Condition C11; or	No evidence of review of the OEMP and subplans was able to be sighted within 3 months of the previous IEA. Record sighted: - Vopak (September 2024) OEMP Rev 6. Noting Rev 5 (also referred to as Rev 4.1) is dated 17 August 2022 and Rev4 dated 8 December 2021.	This condition is considered non-compliant as evidence of OEMP review was unable to be sighted within 3 months of the previous IEA. Recommendation: The OEMP must be reviewed and revised (if required) within 3 months of this IEA.			
				(c) a modification to the development consent. the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent. <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the Development.</i>					
G168	SSD 7000 applicable to B4	C9	Incident Reporting	Upon detecting an exceedance of the limits/performance criteria in this consent or the occurrence of an incident that causes (or may cause) material harm to the environment, the Applicant shall immediately (or as soon as practical thereafter) notify the Secretary and other relevant agencies of the exceedance/incident. Within seven days of the date of the exceedance or incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the exceedance or incident, and such further reports as may be requested.	Record sighted: No incident relating to exceedance of limits/performance criteria have occurred.				
G169	SSD 7000 applicable to B4	C10	Regular Reporting	The Applicant shall provide regular reporting on the environmental performance of the Development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Record sighted: - Geosyntec (2024) report presents a groundwater monitoring that is part of biannual monitoring. The Auditor was unable to sight this in the project website (https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en).	This condition is considered non compliant as the 2024 groundwater monitoring reports is not accessible via the project website at the time of the audit. Recommendation: Applicable environmental performance reports shall be provided on Vopak Sydney website and kept up to date.			
G170	SSD 7000 applicable to B4	C11	Independent Environmental Audit	Within 2 years of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit must: (a) be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	This audit was conducted within 3 years of the previous audit (3 May 2022) Record sighted: - DPHI (6 September 2024) Vopak Bulk Liquids Facility - Independent Auditor Endorsement.				
				(b) include consultation with the relevant agencies;	Consultation with agencies are provided in the main audit report and in Appendix C of the audit report.				
				(c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals);	This is provided in this audit table.				
				(d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and	This is provided in this audit report.				
				(e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under this consent. <i>Note: This audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</i>	This is provided in this audit table and audit report.				
G171	SSD 7000 applicable to B4	C12	Independent Environmental Audit	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Record sighted: - The date of the commission was 21 January 2022. The date of the Audit Report was 3 May 2024. Major Project Portal record SSD-7000-PA-9. The record does not indicate what documents were submitted (i.e. if Vopak responses were also submitted with the IEA report).	The condition is considered non-compliant as the previous audit report for Site B4A was not issued within 3 months of commissioning of the audit. No recommendation made as report has since been submitted.			


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G172	SSD 7000 applicable to B4	C13	Access to Information	The Applicant shall make the following information publicly available on its website and keep the information up to date: (a) the EIS and RTS;	Record sighted: - Website viewed. EIS and RTS present.				
				(b) current statutory approvals for the Development;	Record sighted: - Website viewed. Development consent and other approval documents present.				
				(c) approved strategies, plans or programs;	Record sighted: - Website viewed. OEMP not sighted. Vopak stated that the OEMP provides confidential information.				
				(d) a complaints register, updated on an annual basis; and	Record sighted: - Website viewed. Complaints register present.				
				(e) any other matter required by the Secretary. <i>Note: This condition does not require any confidential information to be made available to the public</i>	Record sighted: - Website sighted.				
EP License 6007 (Applicable to B1 to B4A)									
G173	EP licence 6007 - 24 August 2021	A1.1	1 Administrative Conditions. A1. What the licence authorises and regulates	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.					
				- Chemical storage - Chemical storage waste generation - > 100 T annual volume of waste generated or stored	Interview: - Vopak (AB) stated that B4 does not store chemical waste				
				- Petroleum products and fuel production - Petroleum products and fuel production - > 10000 - 200000 T annual production capacity	Interview: - Site is for storage facility only, no fuel production occurs onsite				
				- Chemical storage - Petroleum products storage - > 100000 kL storage capacity	Noted				
				- Shipping in bulk - Shipping in bulk - > 500000 T of annual capacity to load and unload	Noted				
G174	EP licence 6007 - 24 August 2021	A2.1	1 Administrative Conditions. A2. Premises or plant to which this licence applies	VOPAK TERMINALS AUSTRALIA 20 AND 37 AND 49 FRIENDSHIP ROAD, PORT BOTANY, NSW 2036 LOT 21 DP 1045324, LOT 10 DP 1126332, LOT 103 DP 1182871, LOT 20 DP 1272410 THE PREMISES INCLUDES: * VOPAK BITUMEN TERMINAL LOCATED AT B33, 49 FRIENDSHIP ROAD, PORT BOTANY; * SITE B4A LOCATED AT 37 FRIENDSHIP ROAD, PORT BOTANY; AND * SITE B, GATE B47, 20 FRIENDSHIP ROAD, PORT BOTANY.	Site visit was conducted by the Auditor, which confirmed the address of 20 and 37 Friendship Rd., Port Botany, NSW. This audit is for Site B1, B2, and B3 located at 20 Friendship Rd., Port Botany, NSW and Site 4A located at 37 Friendship Rd., Port Botany, NSW				
G175	EP licence 6007 - 24 August 2021	A2.2	1 Administrative Conditions. A2. Premises or plant to which this licence applies	The premises defined in condition A2.1 includes 'Infrastructure' owned by the licensee for the purpose of carrying out shipping in bulk activities from vessels moored at Bulk Liquids Berth 1 and Bulk Liquids Berth 2 at Port Botany. <i>Note: For the purposes of this condition, 'Infrastructure' includes but is not limited to:</i> - <i>marine loading arms;</i> - <i>pipelines that run from the premises defined in Condition A2.1 to the Bulk Liquids Berths;</i> - <i>hoses; and</i> - <i>hose connections.</i>	Noted				
G176	EP licence 6007 - 24 August 2021	A3.1	1 Administrative Conditions. A3. Information supplied to the EPA	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.	Interview: - EPA has granted the licence - Licence variations present on EPA website				
				In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	The Auditor reviews compliance of this item by reviewing other EPL conditions.				
G177	EP licence 6007 - 24 August 2021	P1.1	2. Discharges to Air and Water and Applications to Land. P1. Location of monitoring/disc harge points and areas	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.	Condition noted				

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G178	EP licence 6007 - 24 August 2021	P1.2	2. Discharges to Air and Water and Applications to Land. P1. Location of monitoring/disc harge points and areas	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Condition noted																																																									
G179	EP licence 6007 - 24 August 2021	P1.3	2. Discharges to Air and Water and Applications to Land. P1. Location of monitoring/disc harge points and areas	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.	Condition noted																																																									
				<table><tr><th colspan="4">Water and land</th></tr><tr><th>EPA Ident- fication no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>2</td><td>Discharge to waters Effluent quality monitoring</td><td>Discharge to waters Effluent quality monitoring</td><td>Discharge from the Stormwater Interceptor located at the south west of the site labelled "Authorised Discharge Point" on drawing No. SD-411 titled "Fuel storage facility Port Botany" submitted to the EPA with Licence Information Form dated 7/6/99</td></tr><tr><td>3</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring well labelled "MW 1" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99</td></tr><tr><td>4</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring well labelled "MW 2" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99</td></tr><tr><td>5</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring well labelled "MW 3" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99</td></tr><tr><td>6</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring well labelled "MW 4" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99</td></tr><tr><td>7</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring well labelled "MW 5" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99</td></tr><tr><td>10</td><td>Surface Water Discharge Point</td><td>Surface Water Discharge Point</td><td>Stormwater discharge from the Final Stormwater PE Discharge at the B4A terminal labelled "Point 10" on drawing No.240503-CV-LAY-2701 titled "Drainage Layout Plan", dated January 2020. EPA reference DOC21570943</td></tr><tr><td>11</td><td>Groundwater quality monitoring</td><td>Groundwater quality monitoring</td><td>Groundwater monitoring well at the B4A terminal labelled "MS01" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943</td></tr><tr><td>12</td><td>Groundwater quality monitoring</td><td>Groundwater quality monitoring</td><td>Groundwater monitoring well at the B4A terminal labelled "MS02" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943</td></tr><tr><td>13</td><td>Groundwater quality monitoring</td><td>Groundwater quality monitoring</td><td>Groundwater monitoring well at the B4A terminal labelled "MS03" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. 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Type of Monitoring Point	Type of Discharge Point	Location Description	2	Discharge to waters Effluent quality monitoring	Discharge to waters Effluent quality monitoring	Discharge from the Stormwater Interceptor located at the south west of the site labelled "Authorised Discharge Point" on drawing No. SD-411 titled "Fuel storage facility Port Botany" submitted to the EPA with Licence Information Form dated 7/6/99	3	Groundwater quality monitoring		Groundwater monitoring well labelled "MW 1" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99	4	Groundwater quality monitoring		Groundwater monitoring well labelled "MW 2" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99	5	Groundwater quality monitoring		Groundwater monitoring well labelled "MW 3" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99	6	Groundwater quality monitoring		Groundwater monitoring well labelled "MW 4" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99	7	Groundwater quality monitoring		Groundwater monitoring well labelled "MW 5" on drawing titled "Proposed Additional Monitoring Well Location" faxed to the EPA on 13/12/99	10	Surface Water Discharge Point	Surface Water Discharge Point	Stormwater discharge from the Final Stormwater PE Discharge at the B4A terminal labelled "Point 10" on drawing No.240503-CV-LAY-2701 titled "Drainage Layout Plan", dated January 2020. EPA reference DOC21570943	11	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS01" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943	12	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS02" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943	13	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS03" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. 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12	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS02" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943																																																											
13	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS03" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943																																																											
14	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS04" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943																																																											
15	Groundwater quality monitoring	Groundwater quality monitoring	Groundwater monitoring well at the B4A terminal labelled "MS05" on drawing titled "Proposed monitoring bore locations", prepared by EMM Consulting Pty Limited. EPA reference DOC21570943																																																											
16	Surface Water Discharge Point	Surface Water Discharge Point	Stormwater discharge from Surface Drain Discharge at the B4A terminal labelled "Point 16" on drawing No. 240503-CV-LAY-2701 titled "Drainage Layout Plan", dated January 2020. EPA reference DOC21570943																																																											
G180	EP licence 6007 - 24 August 2021	L1.1	3. Limit Conditions. L1. Pollution of waters	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Interview : - Vopak (AB) stated that there are sampling procedure for stormwater, and if there are exceedances, it is reported to EPA via phone call. A report number is provided by EPA and recorded by Vopak. Annually any exceedances are recorded in the Annual Return.																																																									
G181	EP licence 6007 - 24 August 2021	L2.1	3. Limit Conditions. L2. Load limits	The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below.	Noted																																																									
G182	EP licence 6007 - 24 August 2021	L2.2	3. Limit Conditions. L2. Load limits	The actual load of an assessable pollutant must be calculated in accordance with the relevant load calculation protocol. <i>Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.</i> <table><tr><th>Assessable Pollutant</th><th>Load limit (kg)</th></tr><tr><td>Arsenic (Air)</td><td></td></tr><tr><td>Benzene (Air)</td><td>1500.00</td></tr><tr><td>Benzo(a)pyrene (equivalent) (Air)</td><td></td></tr><tr><td>BOD (Estuarine Water)</td><td></td></tr><tr><td>Fine Particulates (Air)</td><td></td></tr><tr><td>Hydrogen Sulfide (Air)</td><td></td></tr><tr><td>Lead (Air)</td><td></td></tr><tr><td>Mercury (Air)</td><td></td></tr><tr><td>Nitrogen Oxides - Summer (Air)</td><td></td></tr><tr><td>Nitrogen Oxides (Air)</td><td></td></tr><tr><td>Oil and Grease (Estuarine Water)</td><td></td></tr><tr><td>Sulfur Oxides (Air)</td><td></td></tr><tr><td>Total PAHs (Estuarine Water)</td><td></td></tr><tr><td>Total Phenolics (Estuarine Water)</td><td></td></tr><tr><td>Total suspended solids (Estuarine Water)</td><td></td></tr><tr><td>Volatile organic compounds - Summer (Air)</td><td></td></tr><tr><td>Volatile organic compounds (Air)</td><td>125000.00</td></tr></table>	Assessable Pollutant	Load limit (kg)	Arsenic (Air)		Benzene (Air)	1500.00	Benzo(a)pyrene (equivalent) (Air)		BOD (Estuarine Water)		Fine Particulates (Air)		Hydrogen Sulfide (Air)		Lead (Air)		Mercury (Air)		Nitrogen Oxides - Summer (Air)		Nitrogen Oxides (Air)		Oil and Grease (Estuarine Water)		Sulfur Oxides (Air)		Total PAHs (Estuarine Water)		Total Phenolics (Estuarine Water)		Total suspended solids (Estuarine Water)		Volatile organic compounds - Summer (Air)		Volatile organic compounds (Air)	125000.00	Record sighted: - Annual return 2023-2024 states 763kg Benzene and 18,817kg VOC - Annual return 2022-2023 states 823kg Benzene and 21,200kg VOC Previously: - Annual return 2021-2022 states 538kg Benzene and 72,732kg VOC - Annual return 2020-2021 states 181kg Benzene and 51,085 kg VOC - Annual return 2019-2020 states 180kg Benzene and kg 51,444 VOC																					
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G183	EP licence 6007 - 24 August 2021	L3.1	3. Limit Conditions. L3 Concentration limits	For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	See the assessment below for each item. Any exceedance is indicated in the respective condition below as well.	The concentration of a pollutant discharged at Point 2 exceeded the concentration limits for TSS, pH, and BOD between July 2022 to Jun 2023. As such, item G188 below is considered as a non-compliance. This item is not considered as non-compliance, to avoid double counting.																																																															
G184	EP licence 6007 - 24 August 2021	L3.2	3. Limit Conditions. L3 Concentration limits	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	See the assessment below for each item. Any exceedance is indicated in the respective condition below as well.	The concentration of a pollutant discharged at Point 2 exceeded the concentration limits for TSS, pH, and BOD between July 2022 to Jun 2023. As such, item G188 below is considered as a non-compliance. This item is not considered as non-compliance, to avoid double counting.																																																															
G185	EP licence 6007 - 24 August 2021	L3.3	3. Limit Conditions. L3 Concentration limits	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s.	noted																																																																
G186	EP licence 6007 - 24 August 2021	L3.4	3. Limit Conditions. L3 Concentration limits	<div>Air Concentration Limits</div> <div>Point 1</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Organic vapours</td><td>Measure 1</td><td>110</td><td></td><td></td><td></td></tr></table> <div>Point 2</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>100 percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr><tr><td>Nitrogen Oxides</td><td>milligrams per cubic metre</td><td>350</td><td></td><td></td><td></td></tr><tr><td>Volatile organic compounds</td><td>milligrams per cubic metre</td><td>40</td><td></td><td></td><td></td></tr></table>	Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period	Organic vapours	Measure 1	110				Pollutant	Units of measure	100 percentile concentration limit	Reference conditions	Oxygen correction	Averaging period	Nitrogen Oxides	milligrams per cubic metre	350				Volatile organic compounds	milligrams per cubic metre	40				<div>Record sighted:</div> <div>- Ektimo (November 2022, June 2023, November 2023, May 2024) Vapour Recovery Unit Hydrocarbon Recovery Assessment, Vopak Terminals Australia, Sydney Terminal Site B. The concentration reported were all below the license limit of 110.</div> <div>- EPL 6007 (24 August 2021) P1.3. identified the points that are located in B1, B2, and B3 areas.</div> <div>Interview:</div> <div>- Vopak (AB) stated that Point 9 is not located at B1 to B4A site. Hence it is not part of this Audit.</div> <div>- Vopak (AB) stated that pertaining discharges, the Points that are relevant to the current Audit (B1 to B4A sites) are Points 1 and 2.</div>																																		
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G187	EP licence 6007 - 24 August 2021	L3.5	3. Limit Conditions. L3 Concentration limits	The Air Concentration Limits for Point 9 in Condition L3.4 only apply when the Vapour Control System is running to the Thermal Oxidiser. <i>Note: For the purpose of the Table above 'Measure 1' means where organic vapours is recovered, the total concentration of unrecovered vapour emitted to the atmosphere during any period of four hours does not exceed 110 milligrams per litre of volatile organic liquid passing out of the plant during that period.</i>	Noted																																																																
G188	EP licence 6007 - 24 August 2021	L3.6	3. Limit Conditions. L3 Concentration limits	<div>Water and/or Land Concentration Limits</div> <div>Point 2, 10, 16</div> <table><tr><th colspan="6">Air</th></tr><tr><th>EPA identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th colspan="3">Location Description</th></tr><tr><td>1</td><td>Discharge to air Air emission monitoring</td><td>Discharge to air Air emission monitoring</td><td colspan="3">Vapour Recovery Unit serving all road tanker loading bays labelled "A" on drawing number 5D-41 titled "Fuel storage facility Port Botany, Sydney" submitted to the EPA with Licence Information Form dated 7 June 1999</td></tr><tr><td>8</td><td>Parameter monitoring of Temperature and Residence Time</td><td></td><td colspan="3">Thermal Oxidiser for Bitumen Plant labelled as "Point 1" on drawing No. 5522-81-DWG-0004 Rev 2 titled "Vopak Terminals Sydney Pty Limited B5 Bitumen Equipment Location Plan" dated 16/5/14.</td></tr><tr><td>9</td><td>Discharge to air Air emission monitoring</td><td>Discharge to air Air emission monitoring</td><td colspan="3">Vent Stack on Thermal Oxidiser labelled as "Point 4" on drawing No. 5522-81-DWG-0004 Rev 2 titled "Vopak Terminals Sydney Pty Limited B5 Bitumen Equipment Location Plan" dated 16/5/14.</td></tr></table> <table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>30GM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td></td><td></td><td></td><td>20</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><tr><td>pH</td><td>pH</td><td>-</td><td>-</td><td>-</td><td>6.5-8.5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>30</td></tr></table>	Air						EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description			1	Discharge to air Air emission monitoring	Discharge to air Air emission monitoring	Vapour Recovery Unit serving all road tanker loading bays labelled "A" on drawing number 5D-41 titled "Fuel storage facility Port Botany, Sydney" submitted to the EPA with Licence Information Form dated 7 June 1999			8	Parameter monitoring of Temperature and Residence Time		Thermal Oxidiser for Bitumen Plant labelled as "Point 1" on drawing No. 5522-81-DWG-0004 Rev 2 titled "Vopak Terminals Sydney Pty Limited B5 Bitumen Equipment Location Plan" dated 16/5/14.			9	Discharge to air Air emission monitoring	Discharge to air Air emission monitoring	Vent Stack on Thermal Oxidiser labelled as "Point 4" on drawing No. 5522-81-DWG-0004 Rev 2 titled "Vopak Terminals Sydney Pty Limited B5 Bitumen Equipment Location Plan" dated 16/5/14.			Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	30GM concentration limit	100 percentile concentration limit	BOD	milligrams per litre				20	Oil and Grease	milligrams per litre				10	pH	pH	-	-	-	6.5-8.5	Total suspended solids	milligrams per litre				30	<div>Record sighted for Point 2 (site B1 to B3) and 10 (site B4A):</div> <div>- Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit:<div>- Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024), 350030 (30/04/2024), 349507 (20/04/2024), 344366 (19/02/2024), 346746 (17/03/2024), 341519 (14/01/2024), 353499 (10/06/2024), 355983 (08/07/2024), 343146, 355746 (03/07/2024) . Each report provides 2 water results for TSS, BOD, pH, oil and grease except in Report 353463 (sample date 06/06/2024) that does not report Oil and grease as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria, except for TSS (63mg/L) in Report No. 353463 (sample date 06/06/2024).</div><div>- Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.</div><div>- Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022), 313404 (18/12/2022), 310556 (14/11/2022), 304896 (03/09/2022), 303913 (24/08/2022), 302736 (10/08/2022), 300897 (19/07/2022), 299587, 296052 (20/05/2022), 295029, 293979, 288330, 287866 (02/02/2022), 286632, 286360 (07/01/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in Lab report 310556 (sample date 14/11/2022), oil&grease (12mg/L) in Lab report 303913 (sample date 24/08/2022).</div></div> <div>- Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit:<div>- Report No. 350494 (sample date 05/05/2024),</div><div>- Report No. 316333 (10/02/2023),</div><div>- Report No. 292592 (04/04/2022), 296167 (23/05/2022), 299680 (04/07/2022), 289791 (24/02/2022) .</div><div>Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167, 316333, pH in report 292592.</div><div>Interview:</div><div>- Point 16: not sampled. Point 16 is located on B4A, however discharges to NSW Ports Stormwater System (under Friendship Road), as agreed with NSW Ports.</div><div>The Auditor also notes that the following results exceeded the EPL limits but were explained by Vopak:<div>- TSS (63mg/L) exceedance in Report No. 353463 (sample date 06/06/2024) was collected outside the timing required by the EPL and was sampled in Pit 1 instead of Pit 3, to assess if there had been a discharge from NSW Ports that entered Vopak drain.</div></div></div>	<div>This item is considered as non-compliant because there were exceedances to the EPL during this Audit period as reported in the Annual returns.</div> <div>The Auditor also notes that the following results did not meet EPL requirements but were not reported in the annual return:<div>- Oil & grease (12mg/L) exceedance in Lab report 303913 (sample date 24/08/2022) was not reported in 1 July 2022 to 30 June 2023 annual return.</div></div> <div>Recommendation: All exceedances to EPL conditions should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.</div> <div>The stormwater sample collection SOP should be reviewed to identify potential improvements in sample collection procedure to minimise reoccurrence.</div>			
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1	Discharge to air Air emission monitoring	Discharge to air Air emission monitoring	Vapour Recovery Unit serving all road tanker loading bays labelled "A" on drawing number 5D-41 titled "Fuel storage facility Port Botany, Sydney" submitted to the EPA with Licence Information Form dated 7 June 1999																																																																		
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							Compliant	Non-Compliant	Not Triggered														
G189	EP licence 6007 - 24 August 2021	L4.1.	3. Limit Conditions. L4 Volume and mass limits	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area. <table><tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr><tr><td>2</td><td>kilolitres per day</td><td>5300</td></tr></table>	Point	Unit of Measure	Volume/Mass Limit	2	kilolitres per day	5300	NIL	This item is considered non-compliant due to absence of data to address the volume/mass limit condition for the discharge Point 2. Recommendation: The volume of liquids discharged to water or solids or liquids applied to area must be provided in subsequent audit. Data shall be provided to demonstrate that the volume discharged from Point 2 meets the EPL condition.											
Point	Unit of Measure	Volume/Mass Limit																					
2	kilolitres per day	5300																					
G190	EP licence 6007 - 24 August 2021	L5.1	3. Limit Conditions. L5 Waste	The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence. <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>NA</td><td>General or Specific exempted waste</td><td>Waste that meets all the conditions of a resource recovery exemption under Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2014</td><td>As specified in each particular resource recovery exemption</td><td>NA</td></tr><tr><td>NA</td><td>Waste</td><td>Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time</td><td></td><td>NA</td></tr></table>	Code	Waste	Description	Activity	Other Limits	NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular resource recovery exemption	NA	NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA	Interview & Observation: - Vopak (AB) confirmed that no wastes have been imported onto the premises.			
Code	Waste	Description	Activity	Other Limits																			
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NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time		NA																			
G191	EP licence 6007 - 24 August 2021	L6.1	3. Limit Conditions. L6. Other limit conditions	For each monitoring/ discharge point or utilisation area specified in the tables below (by point number), the parameter must be equal to or greater than the lower limits specified for that parameter in that table. <table><tr><th>Parameter</th><th>Point Number</th><th>Units of Measure</th><th>Lower Limit</th><th>Averaging Period</th></tr><tr><td>Residence Time</td><td>8</td><td>Seconds</td><td>0.5</td><td>Instantaneous</td></tr><tr><td>Temperature</td><td>8</td><td>Degrees Celsius</td><td>760</td><td>Instantaneous</td></tr></table>	Parameter	Point Number	Units of Measure	Lower Limit	Averaging Period	Residence Time	8	Seconds	0.5	Instantaneous	Temperature	8	Degrees Celsius	760	Instantaneous	Interview: - Vopak (AB) confirmed that this condition only applicable to B5 area which is not part of the current audit.			
Parameter	Point Number	Units of Measure	Lower Limit	Averaging Period																			
Residence Time	8	Seconds	0.5	Instantaneous																			
Temperature	8	Degrees Celsius	760	Instantaneous																			
G192	EP licence 6007 - 24 August 2021	L6.2	3. Limit Conditions. L6. Other limit conditions	The Limits for Point 8 in Condition L6.1 only apply when the Vapour Control System is running to the Thermal Oxidiser.	Interview: - Vopak (AB) confirmed that this condition only applicable to B5 area which is not part of the current audit.																		
G193	EP licence 6007 - 24 August 2021	O1.1	4. Operating Conditions O1. Activities must be carried out in a competent manner	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Interview: - Vopak (AB) stated that Cleanaway, Rangedale and Veolia handle all rubbish collection and disposal for the site (including emulsion). - Vopak (AB) explained the operational process, indicating: - All tanks were banded. - Any stormwater is collected in bund is processed in WWTP. Record sighted previously: - Cleanaway waste dockets sample : Cleanaway (21 October 2023) records the disposal of emulsion waste. - Cleanaway (24 March 2022) Waste Data Form for slops.																		

Geosyntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non-Compliant	Not Triggered
G194	EP licence 6007 - 24 August 2021	O2.1	4. Operating Conditions O2. Maintenance of plant and equipment	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Record sighted : - CMMS computerised maintenance management system for January, August and September 2024 sighted. Each critical equipment is registered in the system and system will alert the maintenance team for upcoming preventative maintenance. There is Truck loading bay servicing that the system shows as an overdue maintenance for January 2024. However, Vopak stated that this was an administrative error as the maintenance report has been received from provider and attached in the system. This requires an update of the Me2 system. There is an intern helping (Vopak maintenance planner, JS) to ensure that system is kept up-to-date. Similarly for actuator valves that is due for maintenance in May 2024. The actual 17 May 2024 maintenance report was sighted in the system. The Check of 20% of the total Pressure Relieve Valves (PRV) on site were started in Feb 2024 and currently still on going, hence the status was not yet completed at the time of the audit. Due date provided by Maintenance Manager is Feb 2025. Based on the audit, the maintenance planner has a tracking sheet to ensure that work is completed by Feb 2025. Interview & Observation: - Vopak uses the Infor "ME2" computerised maintenance system to assess plant and equipment operations. - Terminal operators are trained to record maintenance requirements in ME2 which is then processed and actioned by maintenance department (where required). - Preventative and Corrective maintenance is managed in this system. - Monthly internal safety critical equipment check is a check on all equipment that has potential impact to the environmental performance and obligation. The monthly check includes a check that all critical equipment that ought to be in the system are in the system and maintenance is kept up to date.				
G195	EP licence 6007 - 24 August 2021	O3.1	4 Operating Conditions O3. Processes and management	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA Waste Classification Guidelines as in force from time to time.	Records sighted : - Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all has the consignor, transporter, and consignee signatures and date. All waste data form provided show that all batches were disposed to licensed facility (EPL 6091) on the same day it got collected. Interview: - No other waste was reported onsite other than the skip bins which is also collected by Cleanaway on regular basis - Vopak confirmed that all slops are returned to Site B holding tanks for processing				
G196	EP licence 6007 - 24 August 2021	O3.2	4 Operating Conditions O3. Processes and management	The licensee must ensure that waste identified for recycling is stored separately from other waste.	Records sighted : - Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all has the consignor, transporter, and consignee signatures and date. All waste data form provided show that all batches were disposed to licensed facility (EPL 6091) on the same day it got collected. Interview: - No other waste was reported onsite other than the skip bins which is also collected by Cleanaway on regular basis - Vopak confirmed that all slops are returned to Site B holding tanks for processing				
G197	EP licence 6007 - 24 August 2021	O4.1	4 Operating Conditions O4. Other operating conditions	The licensee must operate the Vapour Control System (VCS) and Thermal Oxidiser (TO) in accordance with the procedures outlined in the document "Bitumen Odour Management Procedure OPS001E Rev 2" dated 12/2/16, or any subsequent revision of the document. If the licensee undertakes any revision of the "Bitumen Odour Management Procedure" that involves a change to the operating times, modes or conditions of the VCS or TO, then the licensee: a) must provide the proposed revision of the "Bitumen Odour Management Procedure" to the EPA for comment; and b) must not proceed with the implementation of the revised "Bitumen Odour Management Procedure" until a formal written response has been received from the EPA and all reasonable comments from the EPA have been included in the revised "Bitumen Odour Management Procedure".	Bitumen Site is not part of the current Audit scope. Interview: - Vopak confirmed that the Vapour Control System and Thermal Oxidiser are located outside of the current audit site (within B5 site). It is noted NSW EPA website access on 12 April 2023 indicated that there is exceedance to this condition in 6 and 7 March 2022, which states "A flame failure of the VCS occurred on Sunday March 6th between 1500hrs to 1800hrs and again on Monday March 7th between 1500hrs and 1630 hrs resulting in trucks being loaded to the bypass stack." This item has not been considered a non-compliance due to the VCS and thermal oxidiser present outside the audit boundary.				
G198	EP licence 6007 - 24 August 2021	M1.1	5. Monitoring and Recording Conditions M1. Monitoring records	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted				

Geosyntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status																																																																	
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G199	EP licence 6007 - 24 August 2021	M1.2	5. Monitoring and Recording Conditions M1. Monitoring records	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Record sighted was in legible form Interview: - Vopak (AB) stated they kept all record longer than 4 years. Vopak is unaware of data deletion. Data are archived. Selected data were reviewed as part of this audit, as listed in other EPL requirements.																																																																			
G200	EP licence 6007 - 24 August 2021	M1.3	5. Monitoring and Recording Conditions M1. Monitoring records	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Record sighted: - Envirolab Reports, Sample Receipt Advice, and COC were apparent in the folder provided to Geosyntec.																																																																			
G201	EP licence 6007 - 24 August 2021	M2.1	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	See below.																																																																			
G202	EP licence 6007 - 24 August 2021	M2.2	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	<div>Air Monitoring Requirements</div> <div>For Point 1, 8, and 9</div> <div>1</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Organic vapours</td><td>milligrams per litre</td><td>Special Frequency 1</td><td>TM-20</td></tr></table> <div>8</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>residence time</td><td>seconds</td><td>Continuous</td><td>Special Method 1</td></tr><tr><td>Temperature</td><td>Celsius</td><td>Continuous</td><td>TM-2</td></tr></table> <div>9</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Dry gas density</td><td>kilograms per cubic metre</td><td>Yearly</td><td>TM-23</td></tr><tr><td>Hydrogen Sulfide</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-5</td></tr><tr><td>Moisture content</td><td>percent</td><td>Yearly</td><td>TM-22</td></tr><tr><td>Molecular weight of stack gases</td><td>grams per gram mole</td><td>Yearly</td><td>TM-23</td></tr><tr><td>Nitrogen dioxide</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-11</td></tr><tr><td>Oxygen (O2)</td><td>percent</td><td>Yearly</td><td>TM-25</td></tr><tr><td>Temperature</td><td>degrees Celsius</td><td>Yearly</td><td>TM-2</td></tr><tr><td>Velocity</td><td>metres per second</td><td>Yearly</td><td>TM-2</td></tr><tr><td>Volatile organic compounds</td><td>milligrams per cubic metre</td><td>Yearly</td><td>TM-34</td></tr><tr><td>Volumetric flowrate</td><td>cubic metres per second</td><td>Yearly</td><td>TM-2</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	Organic vapours	milligrams per litre	Special Frequency 1	TM-20	Pollutant	Units of measure	Frequency	Sampling Method	residence time	seconds	Continuous	Special Method 1	Temperature	Celsius	Continuous	TM-2	Pollutant	Units of measure	Frequency	Sampling Method	Dry gas density	kilograms per cubic metre	Yearly	TM-23	Hydrogen Sulfide	milligrams per cubic metre	Yearly	TM-5	Moisture content	percent	Yearly	TM-22	Molecular weight of stack gases	grams per gram mole	Yearly	TM-23	Nitrogen dioxide	milligrams per cubic metre	Yearly	TM-11	Oxygen (O2)	percent	Yearly	TM-25	Temperature	degrees Celsius	Yearly	TM-2	Velocity	metres per second	Yearly	TM-2	Volatile organic compounds	milligrams per cubic metre	Yearly	TM-34	Volumetric flowrate	cubic metres per second	Yearly	TM-2	<div>Record sighted:</div> <div>- Method used is TM-20 as sighted in one of the report shown: Ektimo (November 2022, June 2023, November 2023, May 2024) Vapour Recovery Unit Hydrocarbon Recovery Assessment.</div> <div>Interview:</div> <div>- Vopak (AB) confirmed that Point 1 is part of this Audit as it serves Site B. Point 8 and 9 are not part of B1 to B4A areas that are subject to the current audit.</div>			
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G203	EP licence 6007 - 24 August 2021	M2.3	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	<div>Water and/ or Land Monitoring Requirements</div> <div>For Points 2,10,16</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>BOD</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>Oil and Grease</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Special Frequency 2</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Special Frequency 2</td><td>Grab sample</td></tr></table> <div>3,4,5,6,7,11,12,13,14,15</div> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Benzene</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr><tr><td>Ethyl benzene</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr><tr><td>Polycyclic aromatic hydrocarbons</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr><tr><td>Toluene</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr><tr><td>Total petroleum hydrocarbons</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr><tr><td>Xylene</td><td>micrograms per litre</td><td>Every 2 years</td><td>Grab sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	BOD	milligrams per litre	Special Frequency 2	Grab sample	Oil and Grease	milligrams per litre	Special Frequency 2	Grab sample	pH	pH	Special Frequency 2	Grab sample	Total suspended solids	milligrams per litre	Special Frequency 2	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Benzene	micrograms per litre	Every 2 years	Grab sample	Ethyl benzene	micrograms per litre	Every 2 years	Grab sample	Polycyclic aromatic hydrocarbons	micrograms per litre	Every 2 years	Grab sample	Toluene	micrograms per litre	Every 2 years	Grab sample	Total petroleum hydrocarbons	micrograms per litre	Every 2 years	Grab sample	Xylene	micrograms per litre	Every 2 years	Grab sample	<div>Record sighted :</div> <div>- Envirolab certificates of analysis were viewed presenting sampling at Point 2 and 10.</div> <div>- Monitoring point 16 has always been inaccessible in its current state and EPA noted this too then consulted prior to this Audit.</div> <div></div> <div>Interview:</div> <div>- Vopak (AB) stated that Point 1, 2, 10 and 16 are in the area in this Audit scope (B1 to B4A). Other points are outside the scope. Point 1 is VRU for VOC monitoring and Point 2, 10 and 16 are for BOD, Oil, pH and TDS.</div> <div>Point 16: not sampled. Point 16 has access issue and EPA agree and informed.</div> <div>Record sighted :</div> <div>- Geosyntec (2024) Water Quality Monitoring was sighted including accurate location of wells and collection of samples required.</div>																			
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G204	EP licence 6007 - 24 August 2021	M2.4	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	For the purposes of the above tables of this licence: a. 'Special frequency 1' means the collection of a single four hour (continuous) sample during one of the months October, November, December or January in each financial year. The sample must be representative of the predicted maximum concentrations of organic vapours released from the EPA Identification Point during the sample period; and b. 'Special Frequency 2' means two individual grab samples per discharge event. Both of the samples must be collected within one hour of the commencement of discharge. The samples must be taken at a minimum interval of a five minutes apart. In the case of frequent discharge during rainfall events, no more than two discharge events need be sampled per calendar month.	Condition noted. Assessed as M2.2 and M2.3				
G205	EP licence 6007 - 24 August 2021	M2.5	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	For the purposes of the table/s in Condition M2.2 Special Method 1 means the calculation of residence time within the thermal oxidiser using measurements of differential pressure and temperature at alternative locations in the air treatment system, and including all necessary corrections for temperature differences and process gas inflows between the oxidiser and alternative measurement locations.	Condition noted. Assessed as M2.2				
G206	EP licence 6007 - 24 August 2021	M2.6	5. Monitoring and Recording Conditions M2. Requirement to monitor concentration of pollutants discharged	The air monitoring requirements for Point 8 in Condition M2.2 <u>only</u> apply when the Vapour Control System is running to the Thermal Oxidiser.	Condition noted. Assessed as M2.2				
G207	EP licence 6007 - 24 August 2021	M3.1	5. Monitoring and Recording Conditions M3. Testing methods - concentration limits	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	Interview and record sighted : - Method used is TM-20, which is considered suitable.				
G208	EP licence 6007 - 24 August 2021	M3.2	5. Monitoring and Recording Conditions M3. Testing methods - concentration limits	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted. <i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>	Interview: - Vopak confirmed that all testing of waters is subcontracted to an approved NATA certified laboratory. Record sighted: - Envirolab reports from 2022 to 8 July 2024.				
G209	EP licence 6007 - 24 August 2021	M4	5. Monitoring and Recording Conditions M4. Testing methods - load limits	Note: Division 3 of the Protection of the Environment Operations (General) Regulation 2009 requires that monitoring of actual loads of assessable pollutants listed in L2.2 must be carried out in accordance with the relevant load calculation protocol set out for the fee-based activity classification listed in the Administrative Conditions of this licence.	Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024).				
G210	EP licence 6007 - 24 August 2021	M5.1	5. Monitoring and Recording Conditions M5. Recording of pollution complaints	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Record sighted : - Vopak provided access to view "Enablon" , the site complaint / incident register.				
G211	EP licence 6007 - 24 August 2021	M5.2	5. Monitoring and Recording Conditions M5. Recording of pollution complaints	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Record sighted: - The site complaint / incident register includes record of date and time, description for method of complaint., details of the complainant, nature of complaint, follow-up actions, and assigned to the management team to follow.				
G212	EP licence 6007 - 24 August 2021	M5.3	5. Monitoring and Recording Conditions M5. Recording of pollution complaints	The record of a complaint must be kept for at least 4 years after the complaint was made.	Record sighted: The site complaint / incident register is electronic and holds all records for the duration of the operations.				

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G213	EP licence 6007 - 24 August 2021	M5.4	5. Monitoring and Recording Conditions M5. Recording of pollution complaints	The record must be produced to any authorised officer of the EPA who asks to see them.	Interview. Vopak confirmed that EPA have not requested this to date. However records would be made available when required.				
G214	EP licence 6007 - 24 August 2021	M6.1	5. Monitoring and Recording Conditions M6. Telephone complaints line	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Interview. Vopak maintain a 24hr phone line, signposted on the Gate. Any calls would then be registered in "Enablon". None has been registered to date. Observation: - Line was live and contactable when access on 13 September 2024.				
G215	EP licence 6007 - 24 August 2021	M6.2	5. Monitoring and Recording Conditions M6. Telephone complaints line	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Interview. Vopak maintain a 24hr phone line, signposted on the Gate. Any calls would then be registered in "Enablon". None has been registered to date. Observation: - Line was live and contactable when access on 13 September 2024.				
G216	EP licence 6007 - 24 August 2021	M6.3	5. Monitoring and Recording Conditions M6. Telephone complaints line	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	Noted				
G217	EP licence 6007 - 24 August 2021	R1.1	6. Reporting Conditions R1. Annual return documents	Where the licensee is unable to complete a part of the Annual Return by the due date because the licensee was unable to calculate the actual load of a pollutant due to circumstances beyond the licensee's control, the licensee must notify the EPA in writing as soon as practicable, and in any event not later than the due date. The notification must specify: a) the assessable pollutants for which the actual load could not be calculated; and b) the relevant circumstances that were beyond the control of the licensee.	Record sighted : - Annual Returns (2019-2020, 2020-2021, 2021-2022, 2022-2023, 2023-2024) Hence this Condition is not triggered.				
G218	EP licence 6007 - 24 August 2021	R1.2	6. Reporting Conditions R1. Annual return documents	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Annual returns sighted for this Audit period follow this requirement.				
G219	EP licence 6007 - 24 August 2021	R1.3	6. Reporting Conditions R1. Annual return documents	An Annual Return must be prepared in respect of each reporting period, except as provided below. <i>Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.</i>	Noted				
G220	EP licence 6007 - 24 August 2021	R1.4	6. Reporting Conditions R1. Annual return documents	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <i>Note: An application to transfer a licence must be made in the approved form for this purpose.</i>	From EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=6007&id=6007&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued) that is accessed on 16 September 2024, there has been no evidence of application of licence transfer since 2006. Interview: Vopak confirmed that the licence has not been transferred. Therefore, this condition is considered not triggered.				
G221	EP licence 6007 - 24 August 2021	R1.5	6. Reporting Conditions R1. Annual return documents	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	From EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=6007&id=6007&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued) that is accessed on 16 September 2024, there has been no evidence of application of license transfer since 2006. Record sighted : - Annual Returns (2019-2020, 2020-2021, 2021-2022, 2022-2023, 2023-2024).				

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							Compliant	Non-Compliant	Not Triggered
G222	EP licence 6007 - 24 August 2021	R1.6	6. Reporting Conditions R1. Annual return documents	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	<p>From EPA website (https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=6007&id=6007&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued) that is accessed on 16 September 2024, there has been no evidence of application of license transfer since 2006.</p> <p>Record sighted : - Annual Returns (2019-2020, 2020-2021, 2021-2022, 2022-2023, 2023-2024) in EPA website indicate that date the return were received are within the 60 days except 2021-2022 and 2022-2023 return.</p> <p>Interview: - Vopak (AB) stated that there was resubmission required by EPA, hence the date appear to be off due to the second submission. Correspondence between Vopak and EPA was sighted confirming the first submission on 22 August 2023.</p>				
G223	EP licence 6007 - 24 August 2021	R1.7	6. Reporting Conditions R1. Annual return documents	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	<p>Interview: Vopak (AB) stated that Annual Return is retained for at least 4 years. The Auditor sighted the last 4 years of Annual Returns.</p>				
G224	EP licence 6007 - 24 August 2021	R1.8	6. Reporting Conditions R1. Annual return documents	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	<p>Interview: The names of Vopak directors are provided in the Annual Return, but for the 2024 Annual Return, the EPA sent the electronic signature request to director. Email from EPA to Vopak is provided to Geosyntec.</p>				
G225	EP licence 6007 - 24 August 2021	R2.1	6. Reporting Conditions R2. Notification of environmental harm	Notifications must be made by telephoning the Environment Line service on 131 555.	<p>Interview: - Vopak (AB) confirmed that notifications to EPA are made by telephoning the Environment Line service.</p>				
G226	EP licence 6007 - 24 August 2021	R2.2	6. Reporting Conditions R2. Notification of environmental harm	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. <i>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</i>	<p>Record sighted: - Enablon Incident Reporting system, which provides all incidents in site B1 to B4A during operation.</p> <p>- No incident relating to environmental performance was recorded.</p>				
G227	EP licence 6007 - 24 August 2021	R3.1	6. Reporting Conditions R3 Written report	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	<p>Interview: - Vopak confirmed that no event has occurred where the EPA have requested a report for B1-B4A other than below.</p> <p>Record sighted: - EPA (24 November 2022) Total Suspended Solids Concentration Exceedance, 20 Friendship Road, Port Botany NSW 2036 (Ref: DOC22/1030429-1). EPA was requesting a report under condition R3 of Environment Protection Licence No. 6007 regarding notification on 22 November 2022 to the NSW Environment Protection Authority (EPA) of their reported exceedance of the total suspended solids (TSS) limit set out in Vopak's Environment Protection Licence (EPL 6007). - Vopak (8 December 2022) Response to your letter ref DOC22/1030429-1. - EPA site visit sometime in April 2023 followed by Vopak and EPA correspondences (6 April 2023, 16 and 17 May 2023) Interview: - Vopak confirmed that there were no further details requested after EPA site visit.</p>				
G228	EP licence 6007 - 24 August 2021	R3.2	6. Reporting Conditions R3 Written report	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	<p>Interview: - Vopak confirmed that no event has occurred where the EPA have requested a report for B1-B4A other than below.</p> <p>Record sighted: - EPA (24 November 2022) Total Suspended Solids Concentration Exceedance, 20 Friendship Road, Port Botany NSW 2036 (Ref: DOC22/1030429-1). EPA was requesting a report under condition R3 of Environment Protection Licence No. 6007 regarding notification on 22 November 2022 to the NSW Environment Protection Authority (EPA) of their reported exceedance of the total suspended solids (TSS) limit set out in Vopak's Environment Protection Licence (EPL 6007). - Vopak (8 December 2022) Response to your letter ref DOC22/1030429-1. - EPA site visit sometime in April 2023 followed by Vopak and EPA correspondences (6 April 2023, 16 and 17 May 2023) Interview: - Vopak confirmed that there were no further details requested after EPA site visit.</p>				

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G229	EP licence 6007 - 24 August 2021	R3.3	6. Reporting Conditions R3 Written report	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Interview: - Vopak confirmed that no event has occurred where the EPA have requested a report for B1-B4A other than below. Record sighted: - EPA (24 November 2022) Total Suspended Solids Concentration Exceedance, 20 Friendship Road, Port Botany NSW 2036 (Ref: DOC22/1030429-1). EPA was requesting a report under condition R3 of Environment Protection Licence No. 6007 regarding notification on 22 November 2022 to the NSW Environment Protection Authority (EPA) of their reported exceedance of the total suspended solids (TSS) limit set out in Vopak's Environment Protection Licence (EPL 6007). - Vopak (8 December 2022) Response to your letter ref DOC22/1030429-1. - EPA site visit sometime in April 2023 followed by Vopak and EPA correspondences (6 April 2023, 16 and 17 May 2023) Interview: - Vopak confirmed that there were no further details requested after EPA site visit.				
G230	EP licence 6007 - 24 August 2021	R3.4	6. Reporting Conditions R3 Written report	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Interview: - Vopak confirmed that no event has occurred where the EPA have requested a report for B1-B4A other than below. Record sighted: - EPA (24 November 2022) Total Suspended Solids Concentration Exceedance, 20 Friendship Road, Port Botany NSW 2036 (Ref: DOC22/1030429-1). EPA was requesting a report under condition R3 of Environment Protection Licence No. 6007 regarding notification on 22 November 2022 to the NSW Environment Protection Authority (EPA) of their reported exceedance of the total suspended solids (TSS) limit set out in Vopak's Environment Protection Licence (EPL 6007). - Vopak (8 December 2022) Response to your letter ref DOC22/1030429-1. - EPA site visit sometime in April 2023 followed by Vopak and EPA correspondences (6 April 2023, 16 and 17 May 2023) Interview: - Vopak confirmed that there were no further details requested after EPA site visit.				
G231	EP licence 6007 - 24 August 2021	R4.1	6. Reporting Conditions R4 Other reporting conditions	The licensee must submit a summary report of the monitoring required by Condition M2.1 at EPA Identification Point 1, to the EPA within 60 days after the completion of the licence reporting period. The report must include: (a) the monthly total throughput of the facility served by the vapour recovery unit(s) for the previous 12 month licence reporting period (ie. 17 July to 16 July) and the average daily throughput for the months October to January inclusive; and (b) the tanker loader pattern by hour, for the day of the test (midnight to midnight) or tank receipts, as appropriate.	Interview: - Vopak (AB) confirmed that EPL Condition Report R4 is produced each financial year Record sighted: - 2021-2022, 2022-2023, 2023.2024 R4 report addressed this condition.				
G232	EP licence 6007 - 24 August 2021	G1.1	7 General Conditions G1 Copy of licence kept at the premises or plant	A copy of this licence must be kept at the premises to which the licence applies.	Interview: - Vopak (AB) stated licence kept at office shared drive accessible to all staff. Soft copy sighted.				

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G233	EP licence 6007 - 24 August 2021	G1.2	8 General Conditions G1 Copy of licence kept at the premises or plant	The licence must be produced to any authorised officer of the EPA who asks to see it.	Interview: - Vopak (AB) during EPA visit in 2023 and 2024 EPA did not request for the licence copy.				
G234	EP licence 6007 - 24 August 2021	G1.3	9 General Conditions G1 Copy of licence kept at the premises or plant	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Interview: - Vopak (AB) stated licence kept at office shared drive accessible to all staff. Soft copy sighted.				
G235	EP licence 6007 - 24 August 2021	G2.1	9 General Conditions G2 Other general conditions	The location of EPA licensed discharge point numbers 1, 2, 10 and 16 must be clearly marked with signs to indicate the point identification number used in this licence and be located as close as practical to the point.	Observation: - Monitoring points 1, 2, 10 signs were sighted. Interview: - Vopak (AB) states that sign for Point 16 is still displayed.	Recommendation: Signs for discharge point number 1, 2, 10 and 16 must be displayed as close as practical to the point and maintained at all time.			
OEMP (Applied to B1 to B4A)									
G236	OEMP	1.9	OEMP Responsibility and Review	A review of the OEMP and sub-management plans is to be carried out every 3 years (to match the same timeframe as the Environmental Audit for Site B specified in the conditions of consent) or sooner as required by the following cases within the three-year interval: • When there is a significant environmental incident. • When there is a need to improve performance in the area of an environmental impact. • When changes are proposed to Site B operations • At the completion of environmental audits (internal Vopak audits, external audits, etc). Actions from audit and maintenance reports that identify any non- compliance with defined procedures or improvements to the OEMP are recorded in Enablon Vopak's electronic action tracking system. • When there is an update or change in relevant Commonwealth, State and Territory legislation and local Conditions of Consent (as per Vopak procedure QAP09C – Compliance with Regulations). All revisions/updates of the OEMP and sub-management plans are the responsibility of the Vopak SHECQ & Sustainability Manager. The SHEQ Manager also ensures that all relevant procedures and documentation continues to conform to appropriate current legislation and requirements.	Record sighted: The OEMP was updated in August 2022 and September 2024.				
G237	OEMP	2.9.1	Spill Containment	All tanks are in bunded areas which provide 110% containment of the largest tank volume plus an allowance for firewater containment in accordance with the requirements of AS1940. The bund materials and construction differ between the B1/B2, B3 and B4A areas as they were constructed at different times. B1/B2 tanks are gravel bunds with a liner. B3A and B4A tanks are also within a gravel bund with a liner and the B3B area tanks are within a concrete floored bund. Bunds are equipped with level detection and high-level alarms. Spills, wash down water and rainwater in road tanker loading bays collect in a drainage system which is manually pumped out to the slops tanks. Pump bays are located in curbed and covered areas with a sump and a pneumatic diaphragm pump which transfers liquid from the sump to the slops tanks.	Interview: - Bund design is not included within current operational audit. - Vopak (AB) confirmed that the bund sumps were equipped with level detection and high level alarms.				
G238	OEMP	2.9.2	Stormwater	The B4A stormwater system is designed to comply with the requirements from the Port Botany Development Code, Randwick Council Standards and the AS 3500: National Drainage and Plumbing Code. A detailed overview of the system, including layout and discharge points is provided in the Water Management Plan (Appendix I).	Record sighted previously:: - Engineering, Procurement and Construction document (240503-CV-DC-2007, dated 13/4/2020) sighted which details the as built drainage system				
G239	OEMP	2.9.2	Stormwater	Like at Site B stormwater at B4A either flows naturally from the site (low use areas, such as perimeter roadways) to slow-release sumps that ensure a controlled release to not overwhelm NSW Ports drainage systems (such as Point 16). Stormwater from internal roadways is collected into the site stormwater system to the B4 interceptor pit. Stormwater that collects in bunds is treated via oil water separator and transferred to the B4 interceptor pit. The site Interceptor Pit is sampled as per EPL and site operating procedure requirements and manually released (operator initiated) released from the interceptor pit.	Interview & Observation: - Vopak (MB) confirmed the process of water treatment prior to discharge. - Interceptor pit viewed and monitoring results were sighted..				
G240	OEMP	2.9.3	Vapour Recovery Unit	A vapour recovery unit (VRU) recovers vapours from the tanker loading bay (via connection of the vapour return hose to the trucks), reducing emissions to atmosphere and also preventing the accumulation of flammable vapours in the vicinity of the loading bays. The VRU vacuum strips hydrocarbon vapours, absorbs them into a gasoline flow and these are collected and returned to a gasoline bulk storage tank. Clean air is released via the VRU stack.	Interview: - Vopak (TM) provided process of vapour recovery onsite, which is in accordance with this item.				
G241	OEMP	2.10	Security	Site B and B4A have flood lighting and camera surveillance throughout the operational areas. Both sites are fully fenced and non-operating gates are locked.	Interview & Observation: - Vopak (AB) indicated operational camera and lighting functions. Lighting functions were not observed during the Audit. - Gate was observed to be locked and sites were fully fenced.				

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G242	OEMP	3.0	Statutory Requirements	Vopak Site B, B4 and the BLBs (BLB1, BLB2) must comply with legislation and maintain/seek relevant Approvals and Licenses that apply to the facility.	Interview: - Vopak (AB) stated that Vopak complies with legislation, and EPL6007 is currently up to date.				
G243	OEMP	4.6	Training	<p>All personnel must successfully complete all listed inductions prior to working on the site. Inductions include Vopak, contractor and NSW Ports requirements. The required Vopak Terminal Induction for staff and contractors includes:</p> <ul style="list-style-type: none">• Vopak general site safety requirements.• Product information including product handling, storage, disposal and emergency procedures.• Reporting requirements in case of any incidents, accidents or spills that happen in the terminal i.e.; all environmental breaches must be reported• Emergency response procedures. <p>Vopak staff and contractors who work at the Bulk Liquid Berth also have to complete the NSW Ports online Induction:</p> <ul style="list-style-type: none">• NSW Ports Health, Safety & Environment Induction• NSW Ports Bulk Liquid Berth Induction. <p>Additional Terminal induction training for new staff includes the following features:</p> <ul style="list-style-type: none">• Introduction to the Vopak and contractor corporate health, safety and environmental policies, objectives and expectations.• Site safety objectives, rules and particular hazards – Site Evacuation, No spill policy, reporting requirements• Environmental Management – storm water control, sampling of overflows, reporting requirements• Site layout, facilities and housekeeping rules.- Emergency Shut Down Equipment, Spill kits, Alarms• Emergency Management - how to respond in case of first aid, fire, spills or loss of containment• Handling Hazardous Chemicals – environmental impact of chemicals, SDS, ADGC, emergency response to spill or loss of containment• Job specific requirements (including specific SHE management).- job location competency assessments including, process safety, quality control and emergency control – loss of containment	Record sighted: - Vopak (AB) provided training records for staff member (AB). Review of this record showed evidence of training for required competencies relevant to their specific role. A number of trainings were overdue. The explanation was due to either to personal reason or that the training is provided in a different language. - Induction record that shows the training of various staff for process control and safety systems, PPE, Emergency, Safety, Health, Environment & Quality.	Recommendation: Review of training records is conducted to close the overdue training requirements for each personnel.			
G244	OEMP	4.7	Communication and Information	<p>QAP20C - Corporate Policies & Procedures Manual allocates responsibility to ensure that the SHE policy is communicated to all levels in the organisation. The policy is provided to employees and contractors during induction and is reviewed in accordance with the SHE Manual.</p> <p>The Site B Safety Health and Environment Committee (SHE Committee) meets at least once per quarter. SHE Committee members complete accredited 'workplace consultation' training to become members of the SHE Committee. Minutes of the SHE Committee are circulated to SHE Committee members and management representatives and displayed on notice boards at prominent work locations.</p> <p>Vopak engages and consults its industrial neighbours, authorities, councils and local communities surrounding the site via an established consultative groups such as the Port Botany Community Consultative Committee.</p> <p>Documents, once formally authorised by the SHECQ & Sustainability Manager, are accessible to all personnel via Vopak's Document Management System called MyDocs.</p> <p>Information on accidents and near misses are communicated globally within Vopak to share learnings via Vopak Incident Notifications published through Vopak's Corporate Operations Excellence (CoOpX).</p> <p>Vopak's EPL and compliance monitoring reports are also provided on the company website, refer to https://www.vopak.com/terminals/asia/vopak-terminal-sydney-site-b.</p> <p>Any notifiable incident under the POEO Act, shall be reported to the relevant authorities under the Act and also to NSW Ports.</p>	Interview & Observation: - SHE policy is in the induction - SHE policy is displayed on the wall in the several locations within the office - SHE is on corporate policy and procedures accessible through their system Record sighted: - SHE Meeting Minutes (13 June 2024).				
G245	OEMP	4.8	Incidents and Compliance	<p>Enablon is used for reporting and tracking incidents and associated actions. Status of actions goes into the site Terminal Report Card and SHE statistics. Information on accidents and near misses are communicated globally within Vopak to share learnings via Vopak Incident Notifications published through Vopak's Corporate Operations Excellence (CoOpX). Enablon is also used to record all environmental or community complaints (as they would be classed as incidents as per Vopak standards). There is an Environmental Telephone Complaints Line (24 hrs), Phone: 9666 4455.</p> <p>In accordance with Condition 7 (MP-0089 MOD 2) and for B4A Condition C9 (SSD 7000), the Department must be notified in writing to compliance@planning.nsw.gov.au immediately after Vopak becomes aware of an incident. The notification must identify the development (including the development application number) and set out the location and nature of the incident.</p>	Interview: - Vopak provided access to view "Enablon" , the site complaint / incident register. - The system was sighted, and process viewed and complies with the description stated in the OEMP.				
G246	OEMP	4.8	Non- Compliance	<p>The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after Vopak becomes aware of any non-compliance with the Site B conditions of consent. Reference will be made to MP-0089 MOD 2 (Conditions 7A – 7C) prior to notification being made in order to ensure consent conditions are satisfied.</p> <p>Note that SSD7000 (B4) does not specify and specific requirements for non-compliance notification and the same approach as for Site B will be adopted for B4A.</p>	Interview - Vopak (AB) stated that they are unaware of non-compliance to be reported during this Audit period.				

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G247	OEMP	4.9	Complaints	Any Environmental or Pollution complaints directed to Vopak are handled via the SHE004C Incident Investigation and Reporting procedure (Appendix G). All environmental or community complaints are to be logged in Enablon and reported immediately to the Terminal Manager and investigation occurs. If the complainant is known, Vopak will notify them of complainant the outcome of the investigation.	Interview: - Vopak provided access to view "Enablon" , the site complaint / incident register. - The system was sighted, and process viewed and complies with the description stated in the OEMP. - No complaints have been received associated with environmental performance.				
G248	OEMP	4.9	Disputes	If following an investigation of a complaint related to operations or environmental management from the community, neighbour or the landlord and the complainant remains dissatisfied with the findings of the investigation and a dispute ensues Vopak will meet with the complainant to further define the issue. Vopak will further assess its compliance with all relevant approvals, licences and monitoring criteria. The assessment process may include further monitoring if appropriate and/or the engagement of specialist third party. If Vopak is compliant with the relevant approvals, licences and monitoring criteria, Vopak will provide the findings and/or results to the complainant and seek to close the matter. If further investigation, remediation or rectification works are required Vopak will keep the complainant updated on progress and/or results until compliance is demonstrated. Vopak will advise the complainant that compliance has been achieved and close the matter.	Interview: - Vopak provided access to view "Enablon" , the site complaint / incident register. - The system was sighted, and process viewed and complies with the description stated in the OEMP. - No complaints have been received associated with environmental performance.				
G249	OEMP	4.10.1	Emergency Response	The emergency response plan (ERP) is detailed in procedure OPS09.1B Emergency Procedures Plan – Site B which is communicated to all personnel through emergency response training and induction. The ERP is intended to cover all emergencies that may occur at Site B and B4A, which includes: • Site B perimeter • B4A perimeter • Vopak Terminals manifold and pipelines at the BLB1 and BLB2 wharf • Pipeline Corridor between the Site B and the BLB1 and BLB2 wharf • Pipeline Corridor between the BLB1 wharf up to the Jet Fuel pipeline connections in Bumborah Point Road • CTP pipeline up to the Caltex Banksmeadow Terminal. • Piping under Friendship Rd connecting B4A and Site B The basic philosophy is that all spills are regarded as incidents and relevant authorities are required to be notified of all incidents. Local incidents are handled at the plant level by staff trained to implement measures such as spill containment and first aid firefighting (e.g. use of extinguishers). Incidents more severe than this will involve the emergency services, initiated by alarms to the Fire Brigade. For emergencies which may impact on or involve neighbouring sites, or the community, or emergencies at neighbouring sites which may impact on or involve Vopak's terminal, the NSW Ports Port Botany Emergency Plan (PBEP) is applicable. In the case of such emergencies, notification is done using the Port Botany Emergency Radio and Alarm System (PBER&AS).	Interview - Vopak confirmed that ERP is available on all staff computers via MyDocs (sighted during the audit). - Full version of the document is available in the control room.				
G250	OEMP	Table 5.1	Monitoring of Controls - Air Quality - Hydrocarbon/VOC emissions from tanker filling operations	Controls: • The VRU treats vapours from road tanker loading. • Preventative maintenance program for VRU Monitoring Measures: • EPL includes the VRU as a licensed discharge point with annual sampling and performance check • Operation of the VRU is monitored by operations monitoring of process parameters on SCADA (inlet VOC monitor, temperatures etc) Reporting Measures: • Sampling results / emissions are reported as part of annual return to EPA • National Pollutant Inventory (NPI) reporting • DPIE and EPA notified of any incidents	Record sighted: - Annual Returns (2022-2023, 2023-2024).				
G251	OEMP	Table 5.1	Monitoring of Controls - Air Quality - Hydrocarbon/VOC emissions from tanker filling operations, tank breathing losses	Controls: • Tanks are fitted with internal floating roofs to minimise vapours Monitoring Measures: • Tank periodic inspections include inspection of IFR and seal condition Reporting Measures: • Emissions are reported as part of annual return to EPA • National Pollutant Inventory (NPI) reporting	Interview: - Vopak (AB) confirmed that tanks were fitted with internal floating roofs. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024). - AmSpec (June 2023, August 2023, September 2023) Tank Inspection Report. - ARL (2024) Tank Inspection Report. - NPI 2022-2023 and Annual returns.				

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G252	OEMP	Table 5.1	Monitoring of Controls - Air Quality - Emissions from VRU (eg fault, performance deterioration)	<p>Controls:</p> <ul style="list-style-type: none">• Operation of the VRU is monitored by operations monitoring of process parameters (temperatures etc) <p>Monitoring Measures:</p> <ul style="list-style-type: none">• EPL includes the VRU as a licensed discharge point with annual sampling and performance check• Operation of the VRU is monitored by operations monitoring of process parameters (temperatures)• VRU downtime included in Terminal Report Card (TRC, updated monthly) <p>Reporting Measures:</p> <ul style="list-style-type: none">• Sampling results / emissions are reported as part of annual return reporting to EPA• Annual tests reported as part of annual return• DPIE, NSW Ports and EPA are notified of any incidents	<p>Interview:</p> <ul style="list-style-type: none">- Vopak (AB) confirmed that tanks were fitted with internal floating roofs. <p>Record sighted:</p> <ul style="list-style-type: none">- Annual Returns (2021-2022, 2022-2023, 2023-2024).- AmSpec (June 2023, August 2023, September 2023) Tank Inspection Report.- ARL (2024) Tank Inspection Report.- NPI 2022-2023 and Annual returns.				
G253	OEMP	Table 5.1	Monitoring of Controls - Water – stormwater/surface water - Spillages in road tanker loading bay area leading to water contamination	<p>Controls:</p> <ul style="list-style-type: none">• Training of drivers• Hose integrity checks• High level shutdown for tanker filling• Hardstanding for all loading areas and roadways• Gantry is roofed to minimise contaminated rainwater volumes• Gantry stop and terminal ESD buttons• Man down system (3 minutes)• Road tanker loading gantry area curbing / spill containment volume (NSW EPA and AS1940 compliant).• Gantry drainage directed to slops.• Spill clean-up equipment and procedures <p>Monitoring Measures:</p> <ul style="list-style-type: none">• Operations such as tanker loading and product receipt are monitored by CCTV.• Bunded areas, pits and catch drains are visually inspected.• The first flush pit will be inspected for floating oils/contamination prior to a controlled discharge occurring. <p>Reporting Measures:</p> <ul style="list-style-type: none">• Gantry incidents tracked• DPIE, EPA, NSW Ports are notified of any incidents that may or have caused 'material harm' as defined in the POEO Act.	<p>Interview and observations:</p> <ul style="list-style-type: none">- Tanker filling process was observed.- Monitoring measures, CCTV was observed functioning.- Incident register reviewed. <p>Record sighted:</p> <ul style="list-style-type: none">- Site B Checklist. Examples sighted for 16 and 22/9/2024.				
G254	OEMP	Table 5.1	Monitoring of Controls - Water – stormwater/surface water - Spillages in tank storage areas leading to water contamination	<p>Controls:</p> <ul style="list-style-type: none">• Independent high level shutdown for each tank initiating a terminal ESD• Bunding provided for tanks and road tanker loading gantry area kerbing / spill containment volume (NSW EPA and AS1940 compliant).• Drainage of spills/rainwater to sump pits and rainwater only directed to oily/water separator treatment. Water is then discharged off-site via final interceptor pit.• Spill clean-up equipment and procedures• Contaminated water will be pumped to the slops system once the spill has been investigated (B4A). <p>Monitoring Measures:</p> <ul style="list-style-type: none">• Bunded areas, pits and catch drains are visually inspected.• Prior to release of discharge into Botany Bay, discharge water is sampled and field tested. <p>Reporting Measures:</p> <ul style="list-style-type: none">• Storm water Interceptor Pit Discharge Logs and monthly summary• Water quality at discharge point is reported as part of annual return reporting to EPA• DPIE, EPA, NSW Ports are notified of any incidents	<p>Interview & Observation:</p> <ul style="list-style-type: none">- Vopak (TM) confirmed that the procedure stated in the OEMP is followed for the management of surface spills within the B1-B4 area.- Vopak (AB) stated that spill clean up / containment includes recovering the spill through the slops system, which is stored in tanks outside of B4A.- Spills are recorded through Enablon. No spills have occurred for this audit period				

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G255	OEMP	Table 5.1	Monitoring of Controls - Water – stormwater/surface water - Discharges from waste water treatment leading to water contamination.	Controls: <ul style="list-style-type: none">• Procedure and training• Electrically operated valve to discharge to Botany Bay (failsafe, ie closed if power fails) Monitoring Measures: <ul style="list-style-type: none">• Prior to release of discharge into Botany Bay, discharge water is sampled and field tested. Reporting Measures: <ul style="list-style-type: none">• Storm water Interceptor Pit Discharge Logs and monthly summary• Water quality at discharge point is reported as part of annual return reporting to EPA• DPIE, EPA, NSW Ports are notified of any incidents	Vopak have provided access of the following: <ul style="list-style-type: none">- Envirolab analytical certificates- Stormwater Pit Discharge Log.- Annual returns. Interview: <ul style="list-style-type: none">- Vopak (AB) stated that sampling requirement every 2 months, but sampling were taken every time valve opened (i.e. during rain events).				
G256	OEMP	Table 5.1	Monitoring of Controls - Water – stormwater/surface water - Piping/MLA leaks in wharf during product receipt leading to water contamination	Controls: <ul style="list-style-type: none">• MLA position monitoring and quick release• Bunding at BLB1/BLB2• ESD at wharf Monitoring Measures: <ul style="list-style-type: none">• Import / Export fully attended operation• CCTV monitoring from Vopak and NSW Ports Reporting Measures: <ul style="list-style-type: none">• DPIE, EPA, NSW Ports are notified of any incidents	Interview & observation: <ul style="list-style-type: none">- Bunding was observed.- Vopak (AB, TM) stated that ESD was present at wharf.- Vopak (AB) stated that MLA position monitoring and quick release are present in ships.- Vopak (AB) stated that no incident of material harm has occurred and CCTV is present.				
G257	OEMP	Table 5.1	Monitoring of Controls - Water – Soil and Groundwater: <ul style="list-style-type: none">• Spillages in road tanker loading bay area, tank storage areas leading to soil/groundwater contamination• Discharges from waste water treatment leading to soil/groundwater contamination• Residual contamination from underground oily water system	Controls: <ul style="list-style-type: none">• Segregation of potentially contaminated and clean areas using bunding.• Operating and spill clean-up procedures• Decommissioning of original Site B underground oily water system (replaced with aboveground drainage system facility)• Operator training Monitoring Measures: <ul style="list-style-type: none">• Groundwater monitoring in accordance with the Water Management Plan (B4A) (Appendix I).• Grab samples are taken and tested (every 2 years) Reporting Measures: <ul style="list-style-type: none">• Groundwater quality at monitoring points (via bores) are reported as part of annual return reporting to EPA• DPIE, EPA, NSW Ports are notified of any incidents	Observation: <ul style="list-style-type: none">- Bunding observed onsite (confirmed 110% capacity construction through review of plans). Record sighted: <ul style="list-style-type: none">- ERP includes spill and clean-up.- Training records viewed.- Geosyntec (2024) Groundwater Monitoring Event.- No incidents requiring reporting noted on the incident register.- Annual Returns (2021-2022, 2022-2023, 2023-2024). Interview previously: <ul style="list-style-type: none">Vopak stated that underground oily water system has been decommissioned.				
G258	OEMP	Table 5.1	Monitoring of Controls - Waste - Slops generation due to dewatering and product interfaces during ship import product changes	Controls: <ul style="list-style-type: none">• Procedures for dewatering and interface management Monitoring Measures: <ul style="list-style-type: none">• Slops volumes monitored as part of Terminal Report Card (monthly update) Reporting Measures: <ul style="list-style-type: none">• Annual return to EPA includes slops volumes	Record sighted: <ul style="list-style-type: none">- Vopak (21/7/2021) Bulk Tank Dewatering (OPS07.1B)- Slops inventory viewed on screen, however it is not clear if this was provided in the annual return to EPA. EPA Annual return does not require reporting of slop.	Recommendation: The requirement for slop recording in the OEMP should be reviewed to be consistent with Annual Return requirement.			
G259	OEMP	Table 5.1	Monitoring of Controls - Noise - Noise pollution (including newest addition of 3 pumps on Site B4A)	Controls: <ul style="list-style-type: none">• Task that generate high decibel noise are only performed during day light hours• Warning signs• PPE Monitoring Measures: <ul style="list-style-type: none">• Noise survey to identify high decibel areas within the terminal Reporting Measures: <ul style="list-style-type: none">• DPIE, EPA, NSW Ports are notified of any incidents	Interview: <ul style="list-style-type: none">Vopak (AB) confirmed that:<ul style="list-style-type: none">- PPE training has occurred for whole of site as part of induction.- Ear protection required in some parts of operational areas (e.g. Pump room when it is tested once a month).- No noise incident has been notified (confirmed through review of Enablon).				

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G260	OEMP	Table 5.1	Monitoring of Controls - Greenhouse gas emissions and climate change - Generation of scope 2 and 3 greenhouse gas (GHG) emissions from: <ul style="list-style-type: none">• Electricity to run plant operations;• Delivery and distribution of fuels via road and ship tanker;• Passenger vehicles transporting staff to and from site; and• Combustion of fuel distribution from Site B.	Controls: <ul style="list-style-type: none">• Implementation of environmental management controls noted in the Energy Efficiency Plan (Appendix J) Monitoring of Measures: <ul style="list-style-type: none">• Recording and benchmarking of energy usage at Site B. Reporting Measures: <ul style="list-style-type: none">• Qualitative results of energy usage measured periodically	Record sighted: <ul style="list-style-type: none">- Royal Vopak Sustainability Report 2022-2023 and 2023-2024- Greenhouse gases are reported monthly to Royal Vopak (2022-2024). Interview: <ul style="list-style-type: none">- Vopak (AB) stated that items actioned by Vopak to improve emissions in line with OEMP requirements include:<ul style="list-style-type: none">- Preparation of sustainability plans and budget book- Variable speed drives placed on pumps- Progressive replacement of lights to LED- Progressive motion light sensors for the facility- All VRU already replaced- Secondary seal installation on IFR- Purchase of green energy (B1 to B4A is 100% green energy from Flow Power)				
G261	OEMP	6.1	Reporting and monitoring	Vopak's environmental management system includes the following environmental reporting and monitoring schedules: <ul style="list-style-type: none">• Site inspection checklist (ie plant logs)• Non-compliance and corrective action reports• Complaints reports• Environmental incident reports. Plant logs are hardcopy and records kept in the control room. All other internal reports are entered into and accessible by all personnel via Enablon. Environmental and safety performance indicators are tracked via the site Terminal Report Card (TRC). The TRC provides an overview of the terminal operating KPIs, as well as outages of key environmental safeguards such as the VRU outages and slops volumes. The TRC also includes SHE performance indicators tracked against targets. This is updated monthly and discussed in monthly meetings. Table 6.1 outlines the reports that are required to be submitted by Vopak to external authorities.	Record sighted: <ul style="list-style-type: none">- Vopak (AB) provided evidence of:<ul style="list-style-type: none">- Samples of work orders for maintenance- Enablon records (complaints register / env incident reports)- Terminal report card (including Training / SHEQ / Maintenance / Operation and Customer service / stock control)				
G262	OEMP	Table 6.1	Reporting Requirements	Description- Authority reported to - Frequency: <ul style="list-style-type: none">• Reporting of emissions - National Pollutant Inventory (NPI) - Annual• Annual return (compliance with EPL) - NSW EPA - AnnualAir quality (VRU) - NSW EPA - Annual (Note 1)• Water quality (Discharge from waste water treatment plant) - NSW EPA, Contamination reported to NSW Ports - Annual (Note 1)• Groundwater quality (monitoring points as described in EPL 6007 - NSW EPA, Contamination reported to NSW Ports and NSW EPA - Bi-Annual (Note 1)• Pollutant load limits (benzene, VOCs) - NSW EPA - Annual• Incident reporting (eg exceedances, spills, soil and water contamination) - DPIE, NSW Ports, NSW EPA - Immediately• Recording and benchmarking of energy usage at Site B and Site B4 - Refer to Energy Efficiency Plan (Appendix J) - Refer to Energy Efficiency Plan (Appendix J) Notes 1) Also publicly accessible via https://www.vopak.com/terminals/asia/vopak-terminal-sydney-site-b	Record sighted: <ul style="list-style-type: none">- Royal Vopak Sustainability Report 2022-2023 and 2023-2024- Greenhouse gases are reported monthly to Royal Vopak (2022-2024).- NPI (22/9/2023) NPI Report for 22/23 Vopak Tank Terminals - Site B 38 Financial Year.- Annual Returns (2019-2020, 2020-2021, 2021-2022, 2022.2023, 2023-2024). Interview: <ul style="list-style-type: none">- No incident of material harm has been reported.				

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G263	OEMP	6.2	Auditing	Internal and external audits are conducted to identify non-compliances with defined procedures, and to identify opportunities to improve the effectiveness of the IMS. Vopak has in place documented procedures for internal audits of the IMS (procedure QAP04C), which is supplemented by an audit report (FQAP06C). The procedure covers the audit scheduling and preparation, conducting the audit, report format and audit follow up. The SHECQ & Sustainability Manager establishes and maintains a program of internal audits for all aspects of the company's SHE and Quality Management System and formally assigns a qualified auditor to perform auditing duties. Actions from audits are entered into the action tracking system within Enablon as per procedure QAP03C - Corrective and Preventative procedure. The SHECQ & Sustainability Manager is responsible to ensure that the audits listed on the audit schedule are carried out in a competent and timely manner. External audits are carried out by independent auditors approved by the Director- General. An external Environmental Audit was carried out for Site B, as part of the DPIE conditions for the expansion of Site B (Condition 4, MOD 2 06_0089, See APPENDIX C) on 4 November 2019. In accordance with MOD 2 (Condition 4), an Independent Environmental Audit will be completed every three years after the first. The next audit is scheduled for completion prior to 27 December 2022 for Site B and for B4A as per SSD7000 condition C11.	Interview: Vopak have developed an internal audit procedure: - Terminal health assessment - Business process review (Vopak Royal internal Audit); - Trust and verify (terminal level internal audit) - Quarterly VIMS (Vopak Integrated Management System Audit) - Other audits (Customer Audit that also cover health and environment aspects, EPA Safework) - Six Monthly and random monthly tanker inspection by SLP. Current IEA forms as an external audit.				
G264	OEMP	6.2	Hazard Audit	The most recent hazard audit was completed on 9 July 2020. Hazard audits will be completed at the site every three years after the first. The next audit is scheduled for completion prior to 27 December 2022 for Site B and for B4A as per SSD7000 condition B8.	Record Sighted: - Vopak (27 March 2023) Vopak Site B Port Botany 2023 Hazard Audit. There is no recommendation provided in the report. Hence, there is no submission of program for the implementation of recommendations.				
Traffic Management Plan (Applied to B1 to B4A)									
G265	TMP	E.2	Traffic Movements	Road tanker traffic in excess of 200 vehicles per day is currently experienced at Site B. There will be no road tanker loading / offloading operation at Site B4A and only maintenance / operational vehicle would be accessing the Site B4A	Observation: - No tankers were observed in the Site B4A area during the audit - Site B4A is an unmanned site. - Access to the B4A area is restricted by a swipe card.				
G266	TMP	E.3	Standard and contingency measures of traffic management	Vopak's standard procedure for notifying our customers of scheduled shutdown involves written notification at least 30 days in advance of the scheduled shutdown. This notification period affords customers time to make alternative arrangements to access products stored at Site B prior to or after the shutdown period. In the event a road tanker is present at Site B to load during a scheduled shutdown period, the Terminal Operator notifies the driver of the scheduled shutdown. In the event of an extended unscheduled shutdown of Site B, Vopak will deploy a Traffic Controller. The role of the Traffic Controller will be to manage traffic at the access and egress point of Site B. Dependent on the situation, the Traffic Controller may allow road tankers to remain on enter the site or may request that all road tankers leave the site and the port precinct area until such time as the site becomes operational again.	Record sighted: - Email from Vopak notifying all planned shutdown for the year on 2 January 2024. A few days prior the shutdown there was another reminder email.				
G267	TMP	E.4	Special Provisions	Vopak has existing relationships with the NSW emergency services providers NSW Fire and Rescue, NSW Police Force and NSW Ambulance Service. Vopak allows unrestricted access to Site B to the above service providers. Apart from normal heavy traffic accessing products stored at the terminal. Vopak only anticipates the occasional use of large plant, i.e. cranes at the site. Any activity that involves the use of large mobile plant will be scheduled in advance and allowances have been made on the site for parking this mobile plant.	Interview - Vopak (AB) stated that they hold a daily coordination and weekly planning meeting to discuss Permit To Work and other site operations, including requirements for Large Mobile Plant. - Vopak (AB) stated that Vopak conducts drills in consultation with emergency services.				

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Incident Investigation and Reporting Procedure (Applied to B1 to B4A)									
G268	IIRP	N/A		<p>VTA has established a formal team to conduct investigations, and the procedure outlines their roles and responsibilities as detailed below:</p> <ul style="list-style-type: none">• Vopak operations personnel submit an incident notification form for every accident / incident within the shift to the Terminal Manager - Site B and SHEQ Manager• The Terminal Manager - Site B reviews all incident notifications to ensure that corrective actions are made if required, and to observe any trends which may require action on their part• In the event of an accident or incident, the SHEQ Co-ordinator verifies the findings of the Vopak operations personnel and cooperates in the investigation of every serious or potentially serious occurrence• An immediate oral report is made to the Managing Director in the event of fatality, lost time incident, damage to plant, equipment or materials, any incident related to product quality non-conformance, and all fires. A report is completed thereafter.• In the event of catastrophic, major or serious incidents, an incident investigation team is formed to conduct the investigation• Submit a copy of each report to the Managing Director• The Financial Controller completes all claim forms for property damage. <p>Accident, incident and near miss reporting key performance indicators are documented as follows:</p> <ul style="list-style-type: none">• Statistics from the SHE KPI spreadsheet of safety statistics are incorporated into the 'Terminal Monthly Report Card' and reviewed monthly by the Terminal Monthly Team (TMT).• The investigation reports outstanding (which includes actions) are incorporated into the Terminal Monthly Report Card and reviewed monthly by the Terminal Management Team (TMT).• Statistics from the KPI spreadsheet are incorporated into the National Leadership Team meeting who meets on a monthly basis.• Monthly statistics summarising the SHE KPI Spreadsheet are sent to Singapore (Vopak Asia) <p>Incidents and near misses are communicated globally within Vopak to share learnings via Vopak Incident Notifications published through Vopak's Corporate Operations Excellence (CoOpX).</p>	<p>Record sighted and Interview:</p> <ul style="list-style-type: none">- Enablon is utilised by operations personnel to submit incident notifications.- Terminal Manager receives alerts and reviews.- Enablon system was viewed on site, and examples of incidents and the processes followed was observed. The processes aligned with those stated in the IIRP.				
Air Quality Management Plan B4A. (Applied to B1 to B4A)									
G269	AQMP	5.0	Operational Mitigation measures	<p>Operational mitigation measures to minimise air pollutant emissions from the Vopak site were summarised by AECOM (2017). Mitigation measures currently in place at Site B that are also relevant to the B4A component of the site include:</p> <ul style="list-style-type: none">• Pipeline flanges and pump seals <p>- AECOM (2017) recommended that a Leak Detection survey be completed to determine the extent of fugitive benzene emissions associated with leaks from the pipeline flanges and pumps. Where leaks are detected, Vopak will investigate options to minimise benzene fugitive emissions including replacing pump or flange seals.</p>	<p>Record sighted:</p> <ul style="list-style-type: none">- NPI (2022 - 2023) includes fugitives air emissions for B1 to B4A.				
G270	AQMP	5.0	Mitigation Measures - Dust management	<p>Section B13 of the project's development consent conditions lists the following dust management measures relevant to the construction and operation of the project. Vopak commits to ensuring that these measures and the ones listed following this section are adhered to throughout the project's operations. It is noted that there is no road tanker loading at B4A and therefore truck traffic associated with B4A is limited to any vehicles required during shutdown periods only (typically made of utility vehicles, not heavy vehicles).</p> <ul style="list-style-type: none">• all vehicles on-site do not exceed a speed limit of 20 kilometres per hour;• all loaded vehicles entering or leaving the sites have their loads covered;• all loaded vehicles leaving the site are cleaned of dust, sand and other materials before they leave the site, to avoid tracking these materials on public roads; and• all heavy vehicles on-site do not use engine brakes.	<p>Observation:</p> <ul style="list-style-type: none">- No evidence of unacceptable dust or sediment on road was observed during site visit to B1 - B4A.- No truck was observed to enter or exit the site. <p>Interview:</p> <ul style="list-style-type: none">- Vopak (AB) confirmed that no shut down has occurred for B4A since construction. This item is not triggered				

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G271	AQMP		Mitigation Measures - Air Quality	Appendix 2 of the project's development consent conditions provides the following commitments and mitigation measures in regard to air quality. It is noted that many of these measures related to dust may not be specifically applicable to Site B4A operations but are noted as general best practice measures to mitigate dust in the area surrounding the project and during construction. • a Construction Air Quality Management Plan was prepared for the construction of the wider Project to manage construction air quality impacts (notably dust); • the existing OEMP currently in place for the operating Site B Facility will be reviewed and updated to ensure all reasonable and feasible air quality management measures have been incorporated into the operation of B4A; • all vehicles and plant/equipment should be fitted with appropriate emission control equipment and be serviced and maintained in accordance with the manufacturer's specifications. Smoke from vehicles/plant should not be visible for more than ten seconds; • trucks entering and leaving the premises that are carrying loads of dust-generating materials must have their loads covered at all times, except during loading and unloading; • hard surfaces or paving should be used where possible, as unpaved routes can account for a significant proportion of fugitive dust emissions, particularly during dry/windy conditions. Routes should be inspected regularly and repaired when necessary, and roads should be swept and watered as required to limit dirt/dust build up and potential dust generation during windy conditions; • any areas on site that are not covered with hard surfaces should be vegetated wherever possible to minimise wind erosion and associated dust generation; • all vehicles should be switched off when not in use for extended periods; • water carts and/or road sweeping will be used to minimise dust generation. The frequency of these management measures will be increased during dry windy conditions; • stockpiles where hazardous material has been encountered will be wetted and covered; • active excavation area works will be wetted down with hoses; and • housekeeping will be maintained to keep exposed areas to a minimum.	Observation: - The B1 to B4A site is mostly paved with hardstand. - The Auditor did not observe any unacceptable dust during site visit to B1 - B4A. - No vehicle was observed entering or leaving the B4A site at the time of Audit. Record sighted: - Incident Report list provided by Vopak. - Incidents related to odour only recorded for Site B1 to B3 (not under SSD 7000). Those incidents were an isolated smell within the site, which were detailed as follows: - 30 Nov 2022 (at B1 to B3 sites): Operator noting smell from trailer hose that had spill. Load was then stopped and trailer taken for repairs. - 5 March 2024 (at B1 to B3 sites): Electrical smell in the North area of the building. Fire brigade stated that it was possibly caused by a burnt light transformer. Licensed electrician was scheduled to conduct further check the following day.				
G272	AQMP	6.2	Complaint Reporting	If complaints are received or a pollution incident occurs, the Site Manager will be responsible for completing a complaints or incident form and take actions as necessary. Complaints and incidents deemed to be the direct result of the operational emissions from the projects, should be reported within seven days and should include the following detail: • details of the complaint or incident (date, time, specifics, complainants contact details) will be noted; • activities occurring during the complaint or incident period to be investigated; • log findings of operations during the complaint or incident period in the complaints register; • review relevant management practices as necessary; • respond to complainant with findings of the review; • note findings and actions of investigation in a register; • a record of a complaint or incident should be kept for at least four years and must be produced to any authorised officer of a relevant regulatory agency who asks to see them; and • all complaints or incidents received will be listed in the Environment Protection Licence (EPL) Annual Return.	Record sighted: - Incident Report list provided by Vopak 4 days after the Audit day. - The site complaint / incident register includes detailed description for method of complaint. - Incidents related to odour only recorded for Site B1 to B3 (not under SSD 7000). Those incidents were an isolated smell within the site, which were detailed as follows: - 30 Nov 2022 (at B1 to B3 sites): Operator noting smell from trailer hose that had spill. Load was then stopped and trailer taken for repairs. - 5 March 2024 (at B1 to B3 sites): Electrical smell in the North area of the building. Fire brigade stated that it was possibly caused by a burnt light transformer. Licensed electrician was scheduled to conduct further check the following day.				
G273	AQMP	6.3	Air quality incident definition and response	For the purpose of this AQMP, a complaint or incident that is deemed to be the direct result of operational emissions from the project (following actions described in Section 6.2) will be classified as an air quality incident. Vopak will notify DPIE in writing to compliance@planning.nsw.gov.au within seven days of the incident. The incident notification must: • identify the development and application number; • provide details of the incident (date, time, location, and a brief description of what occurred and why it is classed as an incident); • identify how the incident was detected; • identify when the applicant became aware of the incident; • identify any actual or potential non-compliance with conditions of consent; • describe what immediate steps were taken in relation to the incident; • identify further action(s) with will be taken in relation to the incident; and • identify a project contact for further communication regarding the incident. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant will provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing the following requirements. Further reports may be requested. • a summary of the incident; • outcomes of an incident investigation, including identification of the cause of the incident; • details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent reoccurrence; and • details of any communication with other stakeholders regarding the incident.	Record sighted: - Vopak provided 300 incident records in excel format for the Audit, 4 days after the site visit. It is noted that there were about 28 blank lines in the incident register. It is also noted that previously these lines were identified as B1 to B3 location. In the newer Incident register locations were also deleted. - The site complaint / incident register includes detailed description for method of complaint. Interview: - Vopak (AB) stated no incident of material harm reported during audit period.				

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G274	AQMP	6.5	Review of AQMP	<p>A comprehensive review of the complaint and incident records will be completed as part of the project annual review of operations, and each year thereafter, and will be provided to DPIE. The AQMP should be reviewed and revised (if necessary) within three months of the following:</p> <ul style="list-style-type: none">• the submission of an incident report;• the approval of any modification of the conditions of consent; or• the issue of a direction of the Planning Secretary which requires a review. <p>Any modifications to the AQMP will be undertaken in consultation with the appropriate government agencies.</p>	<p>Interview:</p> <p>- Vopak (AB) stated that there has been no review or modification of AQMP, there has been no incident in relation to air quality, no direction from Planning Secretary which require a review.</p>				
Water Management Plan B4A (Applied to B1 to B4A)									
G275	Water Management Plan	Table 4.4	Ports NSW discharge requirements	<p>Discharge location - Description of how requirements are achieved:</p> <ul style="list-style-type: none">• Discharges to Southern Discharge Point - Runoff from the three bunded areas and Catchments B, D, E discharge via the Southern Discharge Point. All runoff from these catchments will be managed in the Potentially Contaminated Stormwater System (despite some of the catchment area being clean) to avoid the need to duplicate storages. The Potentially Contaminated Stormwater System includes a First Flush and Final Storage Pit (see Section 4.3 for further details). These storages combined with storage in the bunded areas have been sized to achieve Ports NSW discharge requirements (see Table 4.2). <p>The First Flush and Final Storage Pits will be dewatered in accordance with the protocols described in Table 4.6.</p> <ul style="list-style-type: none">• Discharges to Northern Discharge Point - Runoff from Catchments A and C and the northern part of Catchment F discharges to the Northern Discharge Point. Discharge from this pit will be limited to 5 L/s during the designed storm event (a 5% AEP critical duration event). A holding pit along with a pump out system has been configured to achieve this objective. Excess water will be pumped back to the tank bund storage, which has significant capacity (see Table 4.5).	<p>Record sighted previously:</p> <ul style="list-style-type: none">- Drainage Design Calculation (Dialog Services Pty Ltd, 13/4/20) sighted showing the catchment calculations per discharge point, in accordance with the WMP requirements. <p>Not relevant for B1-B3 site. Only for B4 site.</p>				
G276	Water Management Plan	4.4	Slops Management	<p>All slops will be collected in a dedicated system and reticulated to Site B for management in the existing waste disposal system. The slops management system at Site B4A is shown in Figure 4.3.</p>	<p>Record sighted & Interview:</p> <ul style="list-style-type: none">- Vopak provided slop transfer register for review.- Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all has the consignor, transporter, and consignee signatures and date. All waste data form provided show that all batches were disposed to licensed facility (EPL 6091) on the same day it got collected. <p>- Vopak confirmed that all slops are returned to Site B holding tanks for processing.</p> <p>Applicable for B1- B4A sites.</p>				
G277	Water Management Plan	Table 4.6	Operating protocols - Wet weather conditions	<p>1. During Rainfall:</p> <p>Clean Stormwater System</p> <ul style="list-style-type: none">• Any stormwater flow more than 5 L/s and the Northern Discharge Point will be pumped into a bunded area. <p>Potentially Contaminated Stormwater System</p> <ul style="list-style-type: none">• Water captured in the First Flush Pit will be pumped to the oil water separator for treatment and discharged in the Final Storage Pit.• Implement the Controlled Discharge Protocol if Final Storage Pit exceeds 80% capacity. <p>2. Following Rainfall:</p> <p>Clean Stormwater System</p> <ul style="list-style-type: none">• Nil <p>Potentially Contaminated Stormwater System</p> <ul style="list-style-type: none">• The bunded areas and First Flush Pit will be inspected. The Major Leak or Spill Protocol will be implemented if there are significant floating oils in the water (ie floating oil volume is greater than 1% of water volume).• If the inspection does not identify significant floating oils, water captured in the First Flush Pit and bunded areas will be pumped to the oil water separator for treatment. Treated water will be discharged to the Final Storage Pit.• The Controlled Discharge Protocol will be implemented if the Final Storage Pit exceeds 80% capacity or once all water from the First Flush Pit and bunded areas has been treated.	<p>Interview</p> <ul style="list-style-type: none">- Vopak (AB) confirmed the procedure for stormwater containment, assessment and discharge.- Vopak (AB) confirmed that the daily walkover completed by the Operator assesses requirements for bund management during wet weather.				

Geosy ntec ID	Document	SSD Condition / EP Condition / CEMP Section	Item	Condition	Evidence Collected / Observations (Project website: https://www.vopak.com/terminals/vopak-terminal-sydney-site-b?language_content_entity=en)	Independent Audit Findings and Recommendations	Compliance Status		
							Compliant	Non- Compliant	Not Triggered
G278	Water Management Plan		Operating protocols - Controlled Discharge	<p>Clean Stormwater System</p> <ul style="list-style-type: none">• No controlled discharges from the Clean Water system will occur• Potentially Contaminated Stormwater System• The First Flush Pit will be inspected prior to a controlled discharge occurring. If there is evidence of floating oils the water will be reticulated back through oil water separator for further treatment or to the slops system if required.• If no floating oils are observed controlled discharge into the Ports NSW stormwater system (Southern Discharge point) can commence.• Surface water monitoring will be undertaken in accordance with the Surface Water Monitoring Plan (see Section 5.1). <p>Note: the stormwater storages provide sufficient storage to capture runoff from a short duration 5% AEP event which govern the design capacity of the Ports NSW stormwater system on Friendship Road. Controlled discharges will be required during longer duration events to avoid system overflows. Where possible, controlled discharges will be temporarily ceased during intense rainfall periods that may occur within a longer duration rainfall event.</p>	<p>Record sighted:</p> <ul style="list-style-type: none">- Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit:<ul style="list-style-type: none">- Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024), 350030 (30/04/2024), 349507 (20/04/2024), 344366 (19/02/2024), 346746 (17/03/2024), 341519 (14/01/2024), 353499 (10/06/2024), 355983 (08/07/2024), 343146, 355746 (03/07/2024) . Each report provides 2 water results for TSS, BOD, pH, oil and grease except in Report 353463 (sample date 06/06/2024) that does not report Oil and grease as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria, except for TSS (63mg/L) in Report No. 353463 (sample date 06/06/2024) .- Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.- Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022), 313404 (18/12/2022), 310556 (14/11/2022), 304896 (03/09/2022), 303913 (24/08/2022), 302736 (10/08/2022), 300897 (19/07/2022), 299587, 296052 (20/05/2022), 295029, 293979, 288330, 287866 (02/02/2022), 286632, 286360 (07/01/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in Lab report 310556 (sample date 14/11/2022), oil&grease (12mg/L) in Lab report 303913 (sample date 24/08/2022).- Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit:<ul style="list-style-type: none">- Report No. 350494 (sample date 05/05/2024),- Report No. 316333 (10/02/2023),- Report No. 292592 (04/04/2022), 296167 (23/05/2022), 299680 (04/07/2022), 289791 (24/02/2022) . <p>Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167, 316333, pH in report 292592.</p> <p>Interview:</p> <ul style="list-style-type: none">- Vopak (AB) confirmed that the daily walkover completed by the Operator assesses requirements for bund management during wet weather, and controlled discharge. Vopak (AB) confirmed that the process as described is being followed.				
G279	Water Management Plan		Operating protocols - Major leak or Spill	<p>The tank banded areas and First Flush Pit are designed to capture any major leaks or spills that may occur. Each of these storages are blind sumps which means any leak or spill will be contained within the immediate catchment. The following water management protocol will be implemented if a major leak or spill is identified:</p> <ul style="list-style-type: none">• No water will be pumped from the storage until the leak or spill is investigated.• Once the leak has been investigated, contaminated water will be pumped to the slops system. If required, the area around the leak will be hosed down with the resulting water also pumped to the slops system. <p>Refer to OEMP management plan for further information on systems and protocols to manage hazards associated with leaks and spills.</p>	<p>Record sighted:</p> <ul style="list-style-type: none">- Vopak have provided a copy of the as built bund construction, and tank volume, and confirm that the bund achieves 110% capacity. <p>Interview:</p> <ul style="list-style-type: none">- Vopak (AB) confirmed that no leaks have been identified on tanks at B1 to B4A Sites since 2022 (last audit).				
G280	Water Management Plan	5.1.1	Monitoring Plan	<p>Discharges from the Potentially Contaminated Stormwater System will be monitored in accordance with EPL6007 requirements (see Section 2.2) except for Biological Oxygen Demand (BOD). Monitoring of BOD is not proposed as this test has a laboratory assessment time of 5 days and analysis of Oil and Grease will identify any hydrocarbon contamination. Monitoring will be undertaken from the Final Storage Pit which receives treated water from the oil water separator (see Section 4.3). The monitoring will be undertaken when water from the Final Storage Pit is released via a controlled discharge following inspection (see Table 5.1). Table 5.1 describes the proposed monitoring.</p>	<p>Record sighted:</p> <ul style="list-style-type: none">- Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit:<ul style="list-style-type: none">- Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024). Each report provides 2 water results for TSS, BOD, pH, oil and grease except lab report No.353463 as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria.- Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.- Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.- Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit:<ul style="list-style-type: none">- Report No. 350494 (sample date 05/05/2024), 316333 (10/02/2023), 292592 (04/04/2022), 296167 (23/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167.				
G281	Water Management Plan	Table 5.1	Oil and Grease - Milligrams per litre	<p>Two individual grab samples per discharge event. Both of the samples must be collected within one hour of the commencement of discharge. The samples must be taken at a minimum interval of a five minutes apart. In the case of frequent discharge during rainfall events, no more than two discharge events need be sampled per calendar month.</p> <p>Grab sample from the Final Storage Pit.</p>	<p>Record Sighted:</p> <ul style="list-style-type: none">- Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit:<ul style="list-style-type: none">- Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024). Each report provides 2 water results for TSS, BOD, pH, oil and grease except lab report No.353463 as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria.- Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.- Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria.- Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit:<ul style="list-style-type: none">- Report No. 350494 (sample date 05/05/2024), 316333 (10/02/2023), 292592 (04/04/2022), 296167 (23/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167.				
G282	Water Management Plan	Table 5.1	pH - pH units						
G283	Water Management Plan	Table 5.1	Total Suspended Solids (TSS) - Milligrams per litre						
G284	Water Management Plan	Table 5.1	Water level in Final Storage Pit - Water level (m)	Continuous - Continuous monitoring method	<p>Interview:</p> <ul style="list-style-type: none">- Continuous monitoring of the final stormwater pit level for discharge point 2 and 10.				
G285	Water Management Plan	Table 5.1	Controlled discharges - Discharge rate (L/s)	Continuous - Continuous monitoring method	<p>Interview:</p> <ul style="list-style-type: none">- Vopak stating that point 2 and 10 is monitored prior to discharge. Point 16 is currently inaccessible for sampling.				

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G286	Water Management Plan	5.1.2	Monitoring Methods	All monitoring will be undertaken in accordance with Approved Methods for Sampling and Analysis of Water Pollutants in New South Wales (DEC 2004).	Record sighted: - Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit: - Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024). Each report provides 2 water results for TSS, BOD, pH, oil and grease except lab report No.353463 as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria. - Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria. - Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria . - Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit: - Report No. 350494 (sample date 05/05/2024), 316333 (10/02/2023), 292592 (04/04/2022), 296167 (23/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167. Interview: - Vopak (AB) states that Sampling and Analysis of Water Pollutants in New South Wales (DEC 2004).				
G287	Water Management Plan	5.1.3	Assessment Criteria	The surface monitoring results will be compared to concentration limits established in EPL6007 (except for BOD), which are reproduced in Table 5.2. There is no discharge volume criterion. This is because limits on discharge volumes will prevent the stormwater storages being fully dewatered in between rainfall events, increasing the risk of system overflows.	Record sighted: - Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit: - Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024). Each report provides 2 water results for TSS, BOD, pH, oil and grease except lab report No.353463 as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria. - Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria. - Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria . - Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit: - Report No. 350494 (sample date 05/05/2024), 316333 (10/02/2023), 292592 (04/04/2022), 296167 (23/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167.				
G288	Water Management Plan	5.1.4	Exceedance Protocols	Due to laboratory assessment times, monitoring results will be available approximately five days after samples are collected. Once results are received, they will be reviewed within two days. The following exceedance protocol will be implemented if concentration limits (see Table 5.2) are exceeded: 1. The water management system will be reviewed to identify any cause for the exceedance. 2. The exceedance will be reported to the EPA in accordance with EPL requirements.	Record sighted: - Envirolab reports for 2022, 2023, and 2024 Vopak Site B1-B3 Interceptor Pit: - Report No. 352912 (sample date 01/06/2024), No. 353463 (sample date 06/06/2024) and report No. 355746 (sample date 03/07/2024). Each report provides 2 water results for TSS, BOD, pH, oil and grease except lab report No.353463 as Vopak advised that sample was for off site incident and not part of EPL requirement. All concentrations were below criteria. - Report No. 337275, 329928 (sample date 08/08/2023), 323117, and 317071 (sample date 21/02/2023). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria. - Report No. 286360 (sample date 07/01/2022), 293979, 296052 (sample date 20/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria . - Envirolab reports for 2022, 2023, and 2024 Vopak Site B4A Interceptor Pit: - Report No. 350494 (sample date 05/05/2024), 316333 (10/02/2023), 292592 (04/04/2022), 296167 (23/05/2022). Each report provides 2 water results for TSS, BOD, pH, oil and grease. All concentrations were below criteria except TSS in report 296167.				
G289	Water Management Plan	5.2.2	Proposed Monitoring	Groundwater monitoring bores will be installed at the locations and to the specifications recommended in Appendix A. Groundwater monitoring will be undertaken in the following three phases: • Pre-operation: Monthly monitoring will be undertaken prior to the operation of the facility. The results from this monitoring will be used to identify any groundwater hydrocarbon contamination that exists prior to the storage and handling of hydrocarbons at the facility. Following the commencement of operations, the pre-operation data will be reviewed, and the presence of any identified hydrocarbon contamination will be discussed with the EPA. • Operational period (initial two years): Quarterly monitoring will be undertaken for the initial two years of operations. • Operational period (after two years): Bi-annual monitoring will be undertaken after the initial two year period. The monitoring timeframes will be revised if the assessment criteria are exceeded (see Section 5.2.2).	Record sighted: - Geosyntec (18 August 2024) Groundwater Monitoring Event and - Geosyntec (18 August 2024) Groundwater Monitoring Event report Record sighted previously: - PRM (October 2021) Water Quality Monitoring - Pre-operational, Site B4A, 37 Friendship Road, Port Botany, which provides results from 5 monitoring wells prior to filling the tanks. Results indicated no contamination was identified in the vicinity of MB02, where hydrocarbon odour was encountered during construction. - PRM (December 2021) Water Quality Monitoring - Round 2, Site B4A, 37 Friendship Road, Port Botany (Version A), which provides results following operation. Results indicated consistent results with baseline data and no observations of contamination was noted.				
G290	Water Management Plan	Table 5.3	BTEX and TRH - Micrograms per litre	Described in Section 5.2.2 - Grab sample	See G289				
G291	Water Management Plan	Table 5.3	Groundwater level - Water level (m AHD)	As per groundwater quality monitoring - Manual measurement	See G289				
G292	Water Management Plan	Table 5.3	pH, Dissolved Oxygen, Electrical conductivity, temperature, redox (various units)	As per groundwater quality monitoring - In situ measurement using a water quality meter	See G289				

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G293	Water Management Plan	5.2.1	Monitoring Methods	<p>All monitoring will be undertaken in accordance with Approved Methods for Sampling and Analysis of Water Pollutants in New South Wales (DEC 2004) and Australian standard AS/NZS 5667.11:1998 Water Quality – Sampling – Part 11, Guidance on Sampling of Groundwaters.</p> <p>The following Quality Assurance / Quality Control (QA/QC) procedures will be adopted each monitoring round:</p> <ul style="list-style-type: none"> • A duplicate sample will be collected from one of the five monitoring locations. • A rinseate blank sample will be submitted to the laboratory. <p>Both the duplicate and rinseate blank samples will be analysed for the hydrocarbon analytes (Table 5.3).</p>	See G289				
G294	Water Management Plan	5.2.2	Assessment Criteria	<p>All groundwater monitoring results will be assessed against the Default Guidelines Values (DGV) for toxicants in marine waters (95% level of species protection) that are provided in (ANZG 2018). Table 5.4 provides the concentration values for each analyte listed in Table 5.3. It is noted that ANZG (2018) does not provide DGVs for Polycyclic Aromatic Hydrocarbons (PAHs) and Total Petroleum Hydrocarbons (TPHs). This is because these tests screen for a full range of hydrocarbon related chemicals which have variable toxicity. Hence, the purpose of these tests is to identify the presence of hydrocarbon related chemicals.</p> <p>It is noted that there are no assessment criteria for groundwater level and physico-chemical parameters. These parameters are collected to assist with interpretation of any exceedances. For example, the groundwater level data can be used to establish flow direction at the time of sampling.</p>	See G289				
G295	Water Management Plan	5.2.3	Review Protocols	<p>Groundwater monitoring results will be progressively assessed against the assessment criteria in Table 5.4. Any result that exceeds the DGVs or identifies the presence of PAH or TPHs will be reviewed. The review will investigate the potential sources of the contamination which could include:</p> <ul style="list-style-type: none"> • Legacy factors identified by pre-operation monitoring; • External factors identified by results from perimeter bores and understanding of groundwater flow direction; • Internal factors identified by results from all bores and understanding of groundwater flow direction. <p>Additional actions will be undertaken if the review establishes internal factors as being the likely source of contamination. These may include: further monitoring, inspection for leaks, and engaging a specialist to undertake a detailed review.</p>	See G289				
G296	Water Management Plan	6.1	Inspections	<p>The water management system will be regularly inspected. The inspection will:</p> <ul style="list-style-type: none"> • check for blockages to pipes and pipe inlets; • check mechanical equipment is operating correctly; • identify any leaks, spills or other sources of stormwater contamination. <p>Records of inspections will be maintained.</p> <p>Refer Table 4.6 for inspections associated with wet weather and discharge protocols.</p>	<p>Interview:</p> <p>- Vopak (AB) confirmed that the Operations manager for each day completes a daily checklist on maintenance of the facility, including the required water management systems inspections.</p> <p>Record sighted:</p> <p>- Site B Checklist. Examples sighted for 16 and 22/9/2024.</p>				
G297	Water Management Plan	6.2	Maintenance	The water management system will be maintained in a suitable condition to achieve its intended design function.	Record sighted: - Vopak maintenance work order for Site B.				
G298	Water Management Plan	Appendix A, Section 5	Recommended bore construction details	<ul style="list-style-type: none"> • Proposed depth: 6.5m • Proposed sump: 6 to 6.5 m • Proposed screen: 3 to 6 m • Proposed gravel pack: 2.5 to 6.5 m • Proposed bentonite seal: 2 to 2.5 m • Proposed surface cement seal: Surface to 2 m 	See G289				
G299	Water Management Plan	Appendix A, Section 5	MB01 335044, 6238892		See G289				
G300	Water Management Plan	Appendix A, Section 5	MB02 335191, 6238845		See G289				
G301	Water Management Plan	Appendix A, Section 5	MB03 335157, 6238767		See G289				
G302	Water Management Plan	Appendix A, Section 5	MB04 335025, 6238817		See G289				
G303	Water Management Plan	Appendix A, Section 5	MB05 335003, 6238758		See G289				

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G304	Water Management Plan	Appendix A, Section 5	Monitoring well installation	The following should also be considered when installing groundwater monitoring bores for the site: <ul style="list-style-type: none">• monitoring bores should be screened across the groundwater table to detect any LNAPL's that could be leaking/spilled on site and any LNAPL's migrating onto site from other nearby operations;• a qualified hydrogeologist, contaminated land specialist or other suitably qualified professional, should be engaged to supervise the drilling works and ensure monitoring bores are constructed in accordance with the Minimum Construction Requirements for Water Bores in Australia3, and to ensure monitoring bores are screened across the groundwater table;• on completion, monitoring bores should be developed in accordance with Minimum Construction Requirements for Water Bores in Australia;• following bore development, an initial groundwater quality sample should be taken (and analysed at a NATA accredited laboratory for an appropriate suite of chemical parameters) that is consistent with the WMP and the static groundwater level should be recorded;• a drilling completion report, summarising the monitoring bore installation program, should be completed for future reference and/or environmental audits; and• monitoring bores should be surveyed for location and reference levels so that groundwater flow direction can be better estimated.	See G289				
Waste Management Plan (Applied to B1 to B4A)									
G305	Waste Management Plan	6.2	WASTE MOVEMENT	<p>When the waste is transported from the site, the Operations Supt/Manager must ensure that the waste is transported:</p> <p>(a) to a place which has been licensed by the EPA to issue consignment authorisation numbers</p> <p>(b) to a place that can otherwise lawfully accept that class of waste.</p> <p>When the waste is transported from the site, the Operations Supt/Manager must</p> <p>(a) obtain a consignment authorisation number from the consignee</p> <p>(b) complete an approved waste data form in relation to the consigned waste in accordance with the instructions on the form and to the extent required, and give a copy of the form to the person transporting the waste</p> <p>(c) ensure that the waste data form:</p> <p>(i) is completed accurately</p> <p>(ii) is retained for a period of not less than 4 years from the time the form was completed</p> <p>(iii) is made available for inspection by an authorised officer on request,</p> <p>(d) ensure if the waste is of such an amount as to require the contractor transporting it to be licensed, that the person transporting the waste is licensed.</p>	<p>Records sighted :</p> <p>- Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all has the consignor, transporter, and consignee signatures and date. All waste data form provided show that all batches were disposed to licensed facility (EPL 6091) on the same day it got collected.</p> <p>Interview:</p> <p>- No other waste was reported onsite other than the skip bins which is also collected by Cleanaway on regular basis</p> <p>- Vopak confirmed that all slops are returned to Site B holding tanks for processing</p>				
G306	Waste Management Plan	6.3	SEGREGATION OF WASTE	<p>Liquid waste will be disposed off by filling in the tankers of the approved waste management contractor.</p> <p>Slops or waste water from tanks are liquid wastes from the site.</p> <p>Solid waste can be contaminated with oil content (such as oily rags), general solid waste (metal or wood), paper and cardboard or kitchen waste. Solid waste needs to be appropriately segregated.</p> <p>It is the responsibility of Operations Superintendent/ Manager to ensure waste is appropriately segregated as follows:</p> <p>- Any contaminated waste goes into the designated contaminated solid bin</p> <p>- Recycle waste goes into the recycle bins (One bin each placed at Site B, B4 and B5 outside in the terminal. One small bin placed in the office areas at Site B and B5)</p> <p>- General waste goes into the general waste bins (one Each Placed at Site B, B4 and B5)</p>	<p>Records sighted :</p> <p>- Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all has the consignor, transporter, and consignee signatures and date. All waste data form provided show that all batches were disposed to licensed facility (EPL 6091) on the same day it got collected.</p> <p>Interview:</p> <p>- No other waste was reported onsite other than the skip bins which is also collected by Cleanaway on regular basis</p> <p>- Vopak confirmed that all slops are returned to Site B holding tanks for processing</p>				
G307	Waste Management Plan	6.4	DISPOSAL OF WASTE	<p>No waste is to be allowed to be removed from the site without the correct paperwork and copies must be retained.</p> <p>The waste disposal company will leave at the Vopak site a carbon copy of the waste data tracking form showing load number, together with details of the waste removed and quantity of the waste.(f) copy of all paperwork will be retained for four years.</p> <p>Waste data will be logged in the waste register</p>	<p>Records sighted :</p> <p>- Cleanaway (24 May, 24 June, 28 August, 20 September 2024) invoices record the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents) via Cleanaway waste data form that shows the consignor, transporter, and consignee signatures and date. Cleanaway waste data form showed that the waste was disposed to Cleanaway facility with EPL No. 6091. The scheduled activities listed under EPL 6091 includes waste storage for hazardous, restricted solid, liquid, clinical and related waste and asbestos waste. Three of four Cleanaway waste data form provided were noted to be crossed for unclear reason. One of the three has a different date than the date stipulated in the invoice. However, all have the consignor, transporter, and consignee signatures and date. All waste data forms provided show that all batches were disposed to licensed facility (EPL 6091) on the same day they were collected.</p> <p>Interview:</p> <p>- No other waste was reported onsite other than the skip bins which are also collected by Cleanaway on regular basis with monthly invoice and details.</p>				

OEMP Table (Provided as Appendix B of the OEMP)

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Item	Operational Area	Impact	Environmental Classification	Description of Activity (Environmental Aspect)	Frequency of Activity	Incident (Actual or Potential)	Environmental Management Controls	Operational/Monitoring Measures	Frequency of Monitoring	Reporting Measures	Frequency of Reporting	Environmental Criteria/Objective	Link to DPIE Conditions of Approval	Evidence Collected / Observations	Independent Audit Findings and Recommendations	Compliance Status		
																Compliant	Non-Compliant	Not Triggered
2.1	BLB1	Water pollution	Marine flora and fauna	Delivery of fuel from wharf to site	During ship unloading operations	Fuel spill to ocean due to pipe failure at wharf , corrosion etc	- Wharf is bunded - Import is fully attended, also CCTV at NSW Ports control room - Import procedures - Operator and contractor training	Inspection and preventative maintenance for piping / MLAs at wharf	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days	No spills at wharf / from pipeline , no complaints (no specific criteria in EPL)	MP 06_089 MOD 2 Schedule 2, Condition 1 Schedule 4, Condition 7	BLB is not part of this Audit scope. Interview: - Vopak (AB) stated that BLB1 has spill containment. Record sighted: - Copy of incident register provided to Geosyntec indicates that there was spill incident at BLB1 on 15 September 2023. However the spill was reported to be on concrete and absorbent pad and peat were used to cleaned the spill. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.				
2.2	BLB1	Water pollution	Marine flora and fauna	Ship unloading using marine loading arms at BLB1	During ship unloading operations	Fuel spill to ocean due to failure of MLAs, joint or flange leak in marine loading arm, break away coupling, etc	- Marine Loading Arms (MLAs) are designed to minimise risk of spills (valves that do not operate unless MLAs are not correctly connected to ship, emergency release couplings (dry break type), ESD system shuts down valve at the base of each MLA - NSW Ports has a 24 hour emergency response crew for spills into marine waters - Spill clean up procedures in place	Ship import fully attended and also monitored from NSW Ports control room CCTV 'Inspection and preventative maintenance for piping / MLAs at wharf	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days		MP 06_089 MOD 2 Schedule 2, Condition 1 Schedule 4, Condition 7	BLB is not part of this Audit scope. Interview: - Vopak (AB) stated that BLB1 has spill containment. - Vopak (AB) states that MLA with quick release mechanism is used. Record sighted: - Copy of incident register provided to Geosyntec indicates that there was spill incident at BLB1 on 15 September 2023. However the spill was reported to be on concrete and absorbent pad and peat were used to cleaned the spill. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.				
G10	BLB1 / BLB2	Water pollution	Marine flora and fauna	Rain water accumulation on bund working platform	Rain event	Contamination of stormwater and runoff to Botany Bay	Any spills cleaned up Wharf area drain valves left open when import not occurring to prevent accumulation of rainwater		n/a	- Incidents leading to potential water contamination are reported to NSW Ports and EPA				BLB is not part of this Audit scope. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024). Observation: - Tanks were observed to be bunded. Interview: - Exceedances for stormwater discharge point is reported to EPA but not NSW Ports. - Vopak (TM) provided process of testing and discharge of stormwater.				
2.4	BLB1	Water pollution	General environment	Delivery of fuel from wharf to site	During ship unloading operations	Fuel leaking to Botany bay or ground along Fishburn Rd (outside of Vopak property) due to failure / physical damage of wharf import line to site	- Pipeline inspected and tested as per AS2885 requirements - Wharflines left pigged with N2 and empty (except jet fuel, from Site B to JUHI) at completion of import - line walking as part of ship import procedure	Inspection and preventative maintenance for pipelines	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days		MP 06_089 MOD 2 Schedule 2, Condition 1 Schedule 4, Condition 7	BLB is not part of this Audit scope. Record sighted: - NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate. Record sighted: - Copy of incident register provided to Geosyntec indicates that there was spill incident at BLB1 on 15 September 2023. However the spill was reported to be on concrete and absorbent pad and peat were used to cleaned the spill. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.	Recommendation: Although the BLB is not part of the Audit scope, the pipeline extends to B sites. Therefore, AP1 report should be provided in future audits to ensure that the pipelines have been tested in accordance with AS2885. Up to date NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate is also required in the next audit.			
2.5	B1, B2, B3 Tanks (Site B), B4	Water pollution	General environment	Explosion or severe fire destroying fuel tank and impinging on other fuel tanks	n/a	Fuel spill over large area in large volumes. Runoff of contaminated fire water	- Bunds provided for all tanks - Bunds have level detection and alarms - Site has additional containment via drainage design which drains most surfaces (except roads) to interceptor pit which can be isolated via electrical shutoff valve and also by Terminal ESD	-Bund visual inspections	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DoPI, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days		MP 06_089 MOD 2 Schedule 2, Condition 1 Schedule 4, Condition 7	Interview: - Vopak (AB) stated that bulk bunds have level detection and alarms. - Vopak (TM) provided process during high rainfall, which confirmed drainage is available, which allows water to drain to interceptor pit.				
2.7	Interceptor pit (Site B)	Water pollution	Marine flora and fauna	Discharge of stormwater into Botany Bay	After rain events	Contaminated stormwater reaching Botany Bay if stormwater is released before appropriate testing	- Stormwater oily/water separator - Final gate valve linked to ESD - Standard operating procedures - Operator training	- Monitoring instruments and safety valves - First flush sampling - Stormwater management procedures including samples and field testing prior to release into Botany Bay (to comply with EPL requirements)	Ongoing during operations	- Water quality reporting to EPA (Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	Ongoing during operations	Criteria for discharge to waters/effluent quality: BOD: 20 mg/L Oil and grease: 10 mg/L pH: 6.5-8.5 TSS: 30 mg/L (as per EPL)	MP 06_089 MOD 2 Schedule 3, Condition 17 Schedule 4, Condition 7	Interview: - Vopak (TM) provided process during high rainfall, which confirmed drainage is available, which allows water to drain to interceptor pit. Testing is required prior to discharge. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024). noting exceedances were reported to EPA.	Recommendation: Incidents leading to potential water contamination were reported to NSW Ports and DPHI.			

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																Compliant	Non-Compliant	Not Triggered
2.8	BLB2	Water pollution	Marine flora and fauna	Ship unloading using marine loading arms at BLB2	During ship unloading operations	Fuel spill to ocean due to failure of MLAs, joint or flange leak in marine loading arm, break away coupling, etc	- Marine Loading Arms (MLAs) are designed to minimise risk of spills (valves that do not operate unless MLAs are not correctly connected to ship, emergency release couplings (dry break type), ESD system shuts down valve at the base of each MLA - Spill clean up procedures in place - NSW Ports has a 24 hour emergency response crew for spills into marine waters	Ship import fully attended and also monitored from NSW Ports control room CCTV *Inspection and preventative maintenance for piping / MLAs at wharf	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days	Minimal spills, no complaints (no specific criteria in EPL)	MP07_0061 Condition 7.1	BLB is not part of this Audit scope. Interview: - Vopak (AB) stated that BLB2 has spill containment. - Vopak (AB) states that MLA with quick release mechanism is used. - CCTV available onsite. Record sighted: - No complaints occurred during the audit period. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.				
2.9	BLB2	Water pollution	Marine flora and fauna	Delivery of fuel from wharf to site	During ship unloading operations	Fuel spill to ocean due to pipe failure at wharf , corrosion etc	- Wharf is bunded - Import is fully attended, also CCTV at NSW Ports control room - Import procedures - Operator and contractor training	Inspection and preventative maintenance for piping / MLAs at wharf	As per Preventative Maintenance schedule - refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	within 7 days	Criteria for discharge to waters/effluent quality: BOD: 20 mg/L Oil and grease: 10 mg/L pH: 6.5-8.5 TSS: 30 mg/L	MP07_0061 Condition 7.1	BLB is not part of this Audit scope. Interview: - Vopak (AB) stated that BLB2 has spill containment. - Vopak (AB) states that MLA with quick release mechanism is used. - CCTV available onsite.- Fuel filling at BLBs is conducted by NSW Ports. Record sighted: - No complaints occurred during the audit period. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.				
2.10	BLB2	Water pollution	General environment	Delivery of fuel from wharf BLB2 to site (new pipelines in corridor along Fishburn Rd)	During ship unloading operations	Fuel leaking to Botany bay or ground along Fishburn Rd (outside of Vopak property) due to failure / physical damage of wharf import line to site	- Pipeline inspected and tested as per AS2885 requirements - Lines left pigged with N2 and empty at completion of import - line walking as part of ship import procedure	Inspection and preventative maintenance for pipelines	As per Preventative Maintenance schedule *- refer to Me2 for details	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	Minimal spills, no complaints (no specific criteria in EPL)	MP07_0061 Condition 7.1	BLB is not part of this Audit scope. Record sighted: - NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate. - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these comprised near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.	Recommendation: Although the BLB is not part of the Audit scope, but the pipeline extends to B sites. Therefore, AP1 report should be provided in future audits to ensure that the pipelines have been tested in accordance with AS2885. Up to date NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate is also required in the next audit.			
3	Soil and Groundwater																	
3.1	B1, B2, B3 Tanks (Site B), B4A	Soil and groundwater contamination	General environment	Storage of fuel in tanks	24 hours per day, 365 days a year	Fuel leak to ground due to tank/line leak from failure in equipment or structures (eg, external shell corrosion, internal floating roof failure)	- Bunding (impermeable either lined or concrete) provided for all tanks - Bunds and tanks have level detection and alarms - Standard operating procedures - Use of licensed contractors	- Groundwater monitoring (EPL monitoring points) - API tank inspections / preventative maintenance	As per Preventative Maintenance schedule - refer to Me2 for details	- Groundwater reporting to EPA (Bi-Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation - Spills recorded as part of TRC	Bi-Annual within 7 days TRC Monthly	Groundwater monitoring: Grab samples to be taken every 2 years and tested for benzene, ethyl benzene, polycyclic aromatic hydrocarbons, toluene, total petroleum hydrocarbons, xylene. NOTE: No wells in pipeline corridor (not required under EPL)	MP 06_089 MOD 2 - Schedule 3, Conditions 17, 19, 20, 22 - Schedule 4, Condition 7	Observation: - Bunding was observed around all tanks. Information by Vopak indicated the bunds has capacity of up to 110% of tank content. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024). Interview: Vopak (AB) states that: - No incident involving spills have been recorded. - All bunds have level detections and alarms.				
3.2	B1, B2, B3 Tanks (Site B), B4A	Soil and groundwater contamination	General environment	Tank filling	Ongoing during operations	Fuel spill to ground due to overfilling of tanks	- Tank gauging and high level alarms - Independent high level shutdowns for each tank initiates terminal ESD - Bunding provided for all tanks - Bunds have level detection and alarms - Standard operating procedures - Operator training	- Preventative maintenance for tank gauging and high level shutdowns - Groundwater monitoring (EPL monitoring points)	As per Preventative Maintenance schedule - refer to Me2 for details	- Groundwater reporting to EPA (Bi-Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation - Spills recorded as part of TRC	Bi-Annual within 7 days TRC Monthly		MP 06_089 MOD 2 - Schedule 3, Conditions 19, 20, 22 - Schedule 4, Condition 7	See above for Item 3.1.				
3.3	Tanker loading gantry (Site B)	Soil and groundwater contamination	General environment	Loading tankers with fuel	During tanker loading operations	Fuel spill in the gantry area due to equipment failure (eg rupture of vehicle tank, pipe failure) or tanker overfill	- Bund (drains) located around gantry - Overfill protection (scully) - Site induction for tanker drivers (via Form FOPS63B)	Safety Observation rounds include tanker drivers / loading ops		- Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation - Spills recorded as part of TRC	within 7 days (HOLD) TRC Monthly		MP 06_089 MOD 2 - Schedule 3, Conditions 19, 20, 22 - Schedule 4, Condition 7	Record sighted: - Examples of incident reports through Enablon. The list of register generally included near misses, process change and emergency exercise. No incident associated with environmental harm was sighted. Spill incidences were cleaned up using absorbent.				

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																Compliant	Non-Compliant	Not Triggered
3.4	All	Soil loss and sedimentation of marine waters	General environment	Rainfall and storm events	Rainfall and storm events	Erosion and sedimentation	- Site is sealed with some areas of gravel - Operator training	- Site audits / housekeeping inspections				No specific criteria for soil quality/loss in EPL	MP 06_089 MOD 2 - Schedule 3, Condition 22 - Schedule 4, Condition 7	Observation: - Drain covers observed around stormwater drains. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024).				
3.5	All	Soil and groundwater contamination	General environment	Storage of fuel in tanks	24 hours per day, 365 days a year	Hazardous materials escaping to ground and/or water due to failure of bund drainage pit (eg cracked wall)	- Procedural to inspect and pump out bund pits after rain events / spills - Operator training	- Groundwater monitoring (EPL monitoring points)	2 yearly	- Groundwater reporting to EPA (Bi-Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation - Spills recorded as part of TRC	Bi-Annual within 7 days TRC Monthly	Groundwater monitoring: Grab samples to be taken every 2 years and tested for benzene, ethyl benzene, polycyclic aromatic hydrocarbons, toluene, total petroleum hydrocarbons, xylene. NOTE: No wells in pipeline corridor (not required under EPL)	MP 06_089 MOD 2 - Schedule 3, Condition 22 - Schedule 4, Condition 7	Observation: - Bunding was observed around all tanks. Information by Vopak indicated the bunds has capacity of up to 110% of tank content. Record sighted: - Geosyntec (2024) report presents a groundwater monitoring that is part of biannual monitoring. - Annual Returns (2021-2022, 2022-2023, 2023-2024). Interview: Vopak (AB) states that: - No incident or spills that have the potential of resulting in environmental harm have been recorded. - All bunds have level detections and alarms.				
3.6	Pump bays (Site B), B4A	Soil and groundwater contamination	General environment	Fuel transfer in pump bays	24 hours per day, 365 days a year	Fuel spill to ground due to failure of pumps (eg mechanical seal failure) and filter blockages	- Bund provided at pump bays - alarms (coalescing filter and product transfer pump) - Operator training - Work orders	- Maintenance log book/Me2 - Tests and inspections - Preventative maintenance	As per Preventative Maintenance schedule - refer to Me2 for details	- Groundwater reporting to EPA (Bi- Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	24 hours per day, 365 days a year		MP 06_089 MOD 2 - Schedule 3, Condition 22 - Schedule 4, Condition 7	Observation: - Bunding was observed around all pumps. - No sheen was observed on the stormwater in the bunds. Record sighted: - Geosyntec (2024) report presents a groundwater monitoring that is part of biannual monitoring. - Annual Returns (2021-2022, 2022-2023, 2023-2024). - 2022 - Major Incident Controls Performance Standards and Indicators, which includes pumps (coupling alignment) and pumps failure. Interview: Vopak (AB) states that: - No incident or spills that have the potential of resulting in environmental harm have been recorded. - All bunds have level detections and alarms.				
3.7	BLB2	Groundwater contamination	General environment	Berth operations	Ongoing during operations	Contaminated water run-off from operations / bund area pump out infiltrating into groundwater due to leaking wastewater pit	- Valve isolation pit which includes impermeable layer to prevent groundwater pollution - Diversion of water run-off into wastewater storage tank	-NSW ports responsible for this pit / wastewater etc	n/a	n/a	n/a		BLB2 approval : Conditions 2.12, 2.13, 7.1	BLB is not part of this Audit scope. Interview: - Vopak (TM) stated that valve isolation pit is available to prevent groundwater pollution and that stormwater diversion is conducted into wastewater storage tank.				
3.8	BLB2	Groundwater contamination	General environment	Fuel transfer between berth and storages	Ongoing during operations	Leakage of pipelines leading to impact on stormwater runoff from the pipeline corridors and soil/groundwater beneath pipeline corridors	- Pipeline inspected and tested as per AS2885 requirements - Lines left pigged with N2 and empty at completion of import - line walking as part of ship import procedure	Inspection and preventative maintenance for pipelines	Ship import	- Incident reporting to DPIE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	Ongoing during operations		BLB2 approval : Conditions 2.12, 2.13, 7.1	BLB is not part of this Audit scope. Record sighted: - NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate. Interview: - Incident register in excel format provided by Vopak indicates 18 incidences at BLB areas. However, when reviewed, these are near misses, unsafe act, and spill with clean-up on ship or concrete. From the incident registers, there were no evidence of spill incident on the berth and/or the water.	Recommendation: Although the BLB is not part of the Audit scope, but the pipeline extends to B sites. Therefore, AP1 report should be provided in future audits to ensure that the pipelines have been tested in accordance with AS2885. Up to date NSW Ports Port Botany Bulk Liquids Berth Wharf Clearance Certificate is also required in the next audit.			
3.1	Site B	Groundwater contamination	Marine flora and fauna	- Residual contamination within Site B	Underground oily water system removed	Oily water entering the clean water drainage system due to failure of oily water separator or drainage systems	- Decommissioning of underground oily/water system and replaced with aboveground facility	- Monitoring points as per EPL via bores	Underground oily water system removed	- Groundwater reporting to EPA (Bi-Annual) - Incident reporting to DPE, NSW Ports and EPA - Vopak's internal incident reporting and investigation	Annual within 7 days		MP 06_089 MOD 2 - Schedule 4, Condition 7	Interview: - Vopak (AB) stated that underground oily water system has been removed.				
4	Waste																	
4.1	All	Use of resources	General environment	Waste disposal	24 hours per day, 365 days a year	Incorrect hazardous waste disposal (eg tank sludge, contaminated hard waste)	- Application of the waste hierarchy (Avoidance, Reduce, Reuse, Recycling, Disposal) - Use of licensed contractors - Standard operating procedures - Operator and contractor training - Minimal solid waste	- Waste disposal records - hardcopy folders with Logistics		- Annual NPI reporting for liquid and hard waste	Annual	Compliance with OEH Waste Classification Guidelines	MP 06_089 MOD 2 Schedule 3, Condition 28	Interview: - Vopak (AB) stated that Cleanaway, Rangedale and Veolia handle all rubbish collection and disposal for the site (including emulsion). Records sighted: - Cleanaway (24 May 2024) records the disposal of waste code G110 - flammable liquid waste (organic solvent excl halogenated solvents).				

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																Compliance	Non-Compliance	Not Triggered
4.2	Pump bays (Site B), B4A	Contamination due to inappropriate disposal	General environment	Waste (dewatering) from tanks - slops	24 hours per day, 365 days a year	Tank condensate and water draw off from storage tanks incorrectly disposed of into oily/water stormwater treatment system	- Slops tank (Site B) provided to collect waste (slops transfer to Site B from B4A via pipeline) - Slops management procedures in place	- Waste disposal records - hardcopy folders with Logistics - Slops volume tracked as part of TRC		- Annual NPI reporting for liquid and hard waste - TRC monthly	Annual	Compliance with OEH Waste Classification Guidelines	MP 06_089 MOD 2MP 06_089 MOD 2 Schedule 3, Condition 28	BLB is not part of this Audit scope. Record sighted: - NPI (22/9/2023) NPI Report for 22/23 Vopak Tank Terminals - Site B 38 Financial Year. - Slops inventory viewed on screen.				
4.3	BLB1/BLB 2	Use of resources	General environment	Import - interfaces during product changes - slops	During ship unloading operations	Excessive product interface volumes due to poor product change management increases slops volumes	- Slops tank provided to collect waste - Slops management procedures in place - procedures for product changes during import	- Waste disposal records - hardcopy folders with SHE Manager - Slops volume tracked as part of TRC		- Waste reporting to EPA (Annual) - TRC monthly	Annual	Compliance with OEH Waste Classification Guidelines	MP 06_089 MOD 2MP 06_089 MOD 2 Schedule 3, Condition 28	BLB is not part of this Audit scope. Record sighted: - NPI (22/9/2023) NPI Report for 22/23 Vopak Tank Terminals - Site B 38 Financial Year. - Slops inventory viewed on screen.				
4.4	BLB2	Contamination due to inappropriate disposal	General environment	Waste water from bunds around manifold area and working platform	24 hours per day, 365 days a year	Contamination of waste water	- effluent pumps at BLB2 wharf to transfer any contaminated water to shore wastewater pit	- Waste water treated and disposed off in accordance with OEH waste management guidelines		NSW Ports		Compliance with OEH Waste Classification Guidelines	Condition 2.13	BLB is not part of this Audit scope. Record sighted: - Annual Returns (2021-2022, 2022-2023, 2023-2024).				

OEMP Table (Provided as Appendix B of the OEMP)

Item	Operational Area	Impact	Environmental Classification	Description of Activity (Environmental Aspect)	Frequency of Activity	Incident (Actual or Potential)	Environmental Management Controls	Operational/Monitoring Measures	Frequency of Monitoring	Reporting Measures	Frequency of Reporting	Environmental Criteria/Objective	Link to DPIE Conditions of Approval	Evidence Collected / Observations	Independent Audit Findings and Recommendations	Compliance Status		
																Compliant	Non-Compliant	Not Triggered
5	Traffic and transport																	
5.1	Pump bays (Site B), B4A	Minimal impact from ongoing operations.			-	-	- Sufficient space within terminal boundaries for tankers to queue - Onsite parking sufficient for staff, contractors and visitors	-	-	-	-	No traffic complaints	MP 06_089 MOD 2 Schedule 4, Condition 1(d)	Interview: - Vopak states that no traffic complaint has been identified. Observation: - Sufficient parking observed. - Sufficient space for vehicles observed.				
6	Noise																	
6.1	BLB2	Minimal impact from ongoing operations.			-	-	-	-	-	Noise audit required within 90 days of operation commencing	-	No noise complaints (noise levels not exceeding 40 dB(A) at all locations)	BLB2 approval: Conditions 2.9, 2.10, 2.11, 3.1	BLB is not part of this Audit scope. Interview: - Vopak states that no noise complaint has been identified. Observation: - No unacceptable noise was observed.				
6.2	Pump bays (Site B), B4A	Minimal impact from ongoing operations.			-	-	-	-	-	-	-	No noise complaints	-	Interview: - Vopak states that no noise complaint has been identified. Observation: - No unacceptable noise was observed.				
7	Other (fauna and flora)																	
7.1	All	Potential hazard to airport operations	General environment	Attraction of bird species that pose potential risks and hazards to airport operations	24 hours per day, 365 days a year	Attraction of bird species that pose potential risks and hazards to airport operations	Suitable receptacles provided for wastes that could possibly attract bird species	- Housekeeping measures (removal of food scraps) - Regular terminal inspections to locate evidence of nesting (especially under roof structures) - Regular terminal inspections to locate water	-	No specific reporting measures for bird hazard management	-	No birds nesting on Site B / BLB1/BLB2 No complaints from airport authorities	Greens Port guidelines	Interview: - Vopak states that monthly tank inspection reports provide unexpected finds information (e.g. birds). Observation: - No bird was observed or waste that could attract bird was observed.	Recommendation: Evidence of monthly tank inspection that includes the observation of bird nest should be provided in the next audit.			
8	Other (visual amenity, socio-economic, heritage)																	
8.1	Pump bays (Site B), B4A	Minimal impact from ongoing operations.			-	-	-	-	-	-	-	-	MP 06_089 MOD 2 Schedule 3, Condition 24	Observation: No amenity impact was observed. The site is located within surrounding industrial area.				

Appendix G NSW Planning's PAR Advisory Letter

Attachment 1: NSW Planning's PAR advisory letter

To Whom it May Concern

BY EMAIL ONLY:

10 June 2020

Dear Sir/Madam,

**Compliance Reporting and Independent Environmental Audit
Post Approval Requirements (PAR's)**

In December 2018, the Department of Planning, Industry and Environment (Department) introduced the Compliance Reporting and Independent Environmental Audit Post Approval Requirement (PAR) documents to assist proponents of State Significant projects in providing a robust compliance-based oversight of their developments.

Following the introduction of the PAR's, there has been a strong message from proponents about the benefit of all PAR's.

However, the Department recognises that the extensive reporting required by the PAR's can be an impost, particularly for lower scale projects. Accordingly, we have revised the PAR's to reduce reporting obligations (please note some projects may still require reporting requirements in addition to the PAR's which would be conditioned accordingly).

The revised PAR's will work to support construction projects through reducing the demand on compliance reporting however the increase in frequency of independent auditing will ensure the environmental performance and regulatory compliance is maintained for each project.

In updating the Compliance Reporting PAR (2020), we have:

- 1. Removed the requirement for an audit submission schedule*
- 2. Revisited the required reporting frequency*
- 3. Removed the pre-construction and pre-operation reporting requirement*
- 4. Removed the construction reporting requirement*
- 5. Require Compliance Reporting only for operation and decommissioning*

We have updated the Independent Audit PAR (2020) to:

- 1. Remove the requirement for an audit submission schedule*
- 2. Increase the frequency of independent auditing to offset the removal of pre- and during-construction reporting*
- 3. Strengthen the wording around items such as evidence requirements*

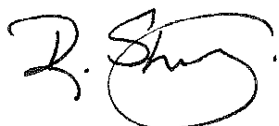
The updated PAR's, along with fact sheets, are available from the Department's website at:

<https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines>

Approved, independent auditors on projects subject to independent environmental audit requirements can use this letter in responding to a non-conformance where a project has implemented the 2020 PARs when a condition requires compliance with the PAR (December 2018).

Should you have any questions relating to the revised PAR's or matters raised within this letter, please contact the undersigned on 9274 6306 or rob.sherry@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R. Sherry".

Rob Sherry
Acting Director – Compliance
Planning & Assessment

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