



2024 ANNUAL REVIEW ENVIRONMENTAL PERFORMANCE

DEVELOPMENT APPLICATION SSD 5544

Ampol Australia Petroleum Pty Ltd

**2 Solander Street
Kurnell NSW 2231**

Reporting Period: 1 January 2024 to 31 December 2024

Report Compiled by:

Dr Jos Kusters, National Environment Manager, Distribution

Amanda Basten, Senior Environmental Management Systems Specialist, Distribution

TABLE OF CONTENTS

1	INTRODUCTION	4
Part 1	PAST DEVELOPMENT ACTIVITIES AND ENVIRONMENTAL PERFORMANCE OF THE TERMINAL	6
1.1	Development Summary	7
1.2	Development Activities During the Last Twelve Months	7
1.3	Terminal Environmental Management Controls	8
1.4	Kurnell OEMP and Environmental Management Sub Plans - Objectives and Monitoring Requirements	9
1.4.1	Air Quality Management Sub Plan	9
1.4.2	Noise Management Sub Plan	10
1.4.3	Waste Management Sub Plan	11
1.4.4	Soil and Water Management Sub Plan	12
1.4.5	Biodiversity and Weed Management Sub Plan	13
1.4.6	Traffic Management Sub Plan	13
1.4.7	Asbestos Contaminated Soil Containment Cell (ACS CC) Long Term Environmental Management Plan	14
1.4.8	Biosecurity Incident Response Management Sub Plan	15
1.5	Development Activities for Next (2024) Calendar Year	16
Part 2	2024 TERMINAL ENVIRONMENTAL MONITORING PERFORMANCE	17
2.1	Terminal Operations During the Calendar Year	17
2.2	Terminal Environmental Management System Controls	17
2.2.1	ISO14001:EMS and ISO9001:QMS Recertification	17
2.2.2	Kurnell Environmental Protection Licence (EPL Lic №: 837)	18
2.3	Terminal Environmental Monitoring and Performance	19
2.3.1	Terminal Monitoring Data	19
2.3.2	Kurnell Community Hotline	42
2.4	Terminal Environmental Non-Compliance And Corrective Actions	44
2.4.1	Perceived Odour Complaints	46
2.4.2	Community Engagement	48
2.4.3	April 2022 Flood Incident - Additional Measures taken by NSW EPA	49
2.4.3.1	Clean Up Notice - Quibray Bay Mangroves Dieback	50
2.4.4	Events Reported to Regulators	51
2.5	2024 Terminal Data Trend Analysis	52
2.6	Terminal Data Discrepancies (Predicted vs Actual Environmental Impacts)	53
Part 3	TERMINAL 2024 ENVIRONMENTAL IMPROVEMENT PLAN OUTCOMES AND PLANS FOR 2025	58
3.1	Changes Made To Enhance The Environmental Performance of Terminal Activities.	58
3.1.2	Kurnell Terminal Odour Reduction and Mitigation Strategy	58
3.1.3	Kurnell Terminal Remediation Action Strategy	59
3.2	Planned Improvement Measures for 2025	61
3.2.1	Implementation of the Tank Sleeve Program – SC E17 (previously PRP U16.2)	61
3.2.2	Kurnell Terminal Odour Reduction and Mitigation Strategy	61
3.2.3	PRP U28 Stormwater Management System Upgrade	61
3.2.4	Kurnell Terminal Remediation Action Strategy	61

3.2.5 Clean Up Notice 3505381 – Quibray Bay Mangrove Dieback	61
3.2.6 SC E20: PFAS Risk Monitoring and Remediation Works	62
3.2.7 2025 Independent Environmental Audit (IEA)	62
3.2.8 Kurnell Terminal Wharf Cathodic Protection Program	62

Part 4 SUMMARY	62
-----------------------	-----------

APPENDICES:

Appendix 1	Status of Ampol Actions Arising from Independent Environmental Audits - SSD 5544: <ul style="list-style-type: none">• IEA 27 Jan 2021;• IEA 2 September 2017 and;• IEA 1 April 2016
-------------------	---

Appendix 2	Environmental Performance against Active Consent Conditions - SSD5544 (Includes MOD1, 2, 3, 4, 5 and 6)
-------------------	---

Appendix 3.	Kurnell Terminal Site Maps
	Figure A. Kurnell Regional Context and SSD5544 Development Consent Boundaries
	Figure B Plot Plan A1-18588 titled “Environment Protection Licence Identification Points”, Version 7, dated 14 February 2020

1 INTRODUCTION

Ampol Australia Pty Ltd – Kurnell Terminal (formally Caltex Refineries (NSW) Pty Ltd) has prepared this annual report to comply with Condition D4 – Annual Review in accordance with the Development Consent for application SSD 5544 (dated 7 January 2014). Condition D4 of the Consent states:

By 31 December 2014 and annually thereafter, or as otherwise agreed in writing by the Director-General, the Applicant shall review the environmental performance of the Development to the satisfaction of the Director-General. This review must:

- a) *Describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;*
- b) *Include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against;*
 - *The relevant statutory requirements, limits or performance measures/criteria;*
 - *The monitoring results of previous years; and*
 - *The relevant predictions in the EIS;*
- c) *Identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;*
- d) *Identify any trends in the monitoring data over the life of the Development;*
- e) *Identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and*
- f) *Describe what measures will be implemented over the current calendar year to improve the environmental performance of the Development.*

Development Definition:

The development as described in the EIS and RTS, and as generally depicted in Appendix A, being for the conversion of the existing Kurnell Refinery to a finished product import and distribution terminal

This Annual Review report presents a summary of the Terminal activities undertaken over the past twelve months, any proposed works for the next twelve months and the analysis and review of the site's environmental performance, as required in the Consent condition. This report is divided in three parts:

Part 1 – Overview of past Development Activities, specifically, the Terminal activities in 2024 and Terminal Environmental performance.

Part 2 – 2024 Specific Terminal Environmental Monitoring and Performance

Part 3 – Terminal Environmental Improvement Plan Outcomes and 2025 Plans

Part 4 – Summary

Appendix 1 - Status of Ampol actions arising from Independent Environmental Audits - SSD 5544 and SSD 5353 (IEA 2 September 2017, IEA 1 April 2016 and IEA January 2021)

Appendix 2 – Environmental performance against any active Consent Conditions

Appendix 3 – Maps

- Figure A - Regional Context and Development Consent Boundaries
- Figure B - Plot Plan A1-18588 titled “Environment Protection Licence Identification Points”, Version 6, dated 14 Feb 2020

Please Note:

In line with earlier advice from Pamela Morales, NSW DPE, all historical monitoring performance data covering the conversion and demolition phases of the Project (2014- 2020 period) have been removed from this and future Annual Review reports. Please refer to the 2022 Annual Review report for previously reported historical monitoring data covering the earlier periods of the project and associated trends over the life of the conversion project up to the end of the demolition phase in February 2020.

The focus in this and future Annual Review reports will be on environmental performance and monitoring data associated with ongoing Terminal operation, relevant Engineering project works relating the Pollution Studies and Reduction Programs (PSRP) and Special Conditions (SC) associated with the Site's EPL (Lic No: 837), the site's Remediation Action Plan Strategy and other site improvement initiatives.

Part 1 - Past Development Activities, 2024 Terminal Activities and Terminal Environmental Performance

1.1 Development Summary

The overall works program associated with the Development Approval is summarised on Table 1.1 below. This table includes the commencement date and completion date for each activity under the Development Approval.

Table 1.1 Overview of Development Activities to Date

Activity	Start	Stop	Status
Tank Farm Automation	July 2012	December 2014	Completed
Tank 613 - Jet Conversion	July 2012	December 2013	Completed
Tank 603 - Jet Conversion	July 2012	May 2014	Completed
Slop Recovery, Storage, Transfer & Injection Upgrade	July 2012	December 2014	Completed
Conversion Tank Bund Modifications	July 2012	June 2015	Completed
Dye, Stadis & Lubricity System	July 2012	September 2014	Completed
Tank 634 - Diesel Conversion	July 2012	April 2014	Completed
Tank 512 - Gasoline Conversion	July 2012	February 2014	Completed
Fire Water System Modifications	October 2012	December 2014	Completed
Electricity Consolidation for Terminal Operation	October 2012	December 2015	Completed
Plant and Instrument Air System	October 2012	April 2015	Completed
Potable Water Modifications	October 2012	March 2015	Completed
OWS System Management	January 2013	December 2014	Completed
Tank Miscellaneous Nozzle Replacement	June 2013	December 2014	Completed
A-Line Gasoline Filter	October 2013	December 2014	Completed

Tank 411 – Gasoline Conversion	October 2014	November 2015	Completed
Tank 413 – Gasoline Conversion	October 2014	March 2016	Completed
Tank 633 – Diesel Conversion	October 2014	June 2016	Completed
Demolition of Refinery Infrastructure	September 2015	August 2019	Completed
Construction, Filling and Capping of ACS Containment Cell	October 2017	31 March 2020	Completed
Conversion Development Conclusion Date		31 March 2020	
Operation of Finished Product Import and Distribution Terminal	Operational from September 2014	Ongoing	

1.2 Development Activities During The Last Twelve Months

The continued operation of the Kurnell Terminal and associated project related works such as:

- Pollution Studies and Reduction Programs and Special Conditions set out in the site’s EPL 837 in relation to the Kurnell flood event in April 2022, that is:
 - PRP U27- Stormwater Pipe Investigations and Rectifications
 - PRP U28 - Stormwater Management System upgrade
 - SC E18 - Waste Water treatment Plant - Odour Reduction Program
- SC E15: PFAS Sampling and Analysis Quality Plan
- SC E16 – Remediation Action Plan Strategy
- SC E17 - (ongoing) Tank Turnaround and Inspections (T&I) program works, and;
- ongoing Wharf Cathodic Protection Program works

Development Definition:

The development as described in the EIS and RTS, and as generally depicted in Appendix A, being for the conversion of the existing Kurnell Refinery to a finished product import and distribution terminal

TABLE 1.2 Potential Environmental Impacts - 2024 Development Activities

Activity	Potential Environmental Impacts	Number of incidents
Operation of <u>Finished Product Import and Distribution Terminal</u> - referred to as Kurnell Terminal (the 'Site'), continues to operate in accordance with the NSW EPA EPL837 and SSD5544 conditions of consent	Soils and Groundwater contamination, Water (Surface), Air Quality (odour) and Asbestos (associated with remediation works), Waste, Noise (during ship berthing/product discharge activities at the Wharf)	Refer to Part 2. for incidents details relating to Terminal operations
Post 2022 flood incident mitigation works at the site's wastewater treatment plant and stormwater system upgrades and initiation of ecologist assessment work on the mangrove area in Quibray Bay	WWTP generated wastewater, Air Quality (odour), Soils and Groundwater contamination, Water (Surface), and Waste	Refer to Section 2.3 for details of 2024 odour complaints and ongoing abatement and mitigation improvement measures
Tanks turnaround and inspections (T&I) – Insertion of Sleeves	Soils and Groundwater contamination, Water (Surface), Air Quality (odour) and Waste (construction)	Nil
Ongoing project works associated with the Kurnell Remediation Action Plan	Soils and Groundwater contamination, Water (Surface), Air Quality (odour) and Asbestos in soils (associated with remediation works), Waste	Nil
Wharf Cathodic Protection Program	Water (Marine Surface), Noise (during ship berthing/product discharge activities at the Wharf), Waste	Nil

1.3 Terminal Environmental Management Controls

Consistent with the requirements of SSD5544 Approval (DPE), the Site and remediation project activities carried during the 2024 calendar year involved the implementation and maintenance of the controls and performance indicators detailed in the Site's *Stage 2 Final Operational Environmental Management Plan* (OEMP). The following environmental

management sub plans are considered relevant to the ongoing Terminal operations, as referenced in D2 (d):

- Air Quality Management Sub Plan (Condition C28);
- Soil and Water Management Sub Plan (Condition C10 and C12);
- Noise Management Sub Plan (Condition C22);
- Traffic Management Sub Plan (Condition C36);
- Waste Management Sub Plan (Condition C40);
- Biodiversity, Weed and Pest Management Sub Plan (Conditions 42 & 43);

Final reviews and amendments were made to the Kurnell Terminal Operational Environmental Management Plan (OEMP) and above-mentioned Management Sub-Plans prior to the submission of the Stage Two Final OEMP to the NSW DPE on 7 March 2022.

The revised *Stage 2 Final Terminal OEMP* (including all Management Sub-Plans listed above and the ACS Cell LTEMP) was approved by the DPE on 8 April 2022.

Further revisions and amendments to the OEMP will be made at the conclusion of the Stormwater Upgrade program in Qtr. 4, 2025. Once the updated OEMP has been approved by the Kurnell Terminal Operations Manager and the Distribution National Environment Manager, a copy of the document will be sent to the Department for review and approval.

Note: The Department approved Stage 2 OEMP (a redacted version), including the above-mentioned management sub plans is published on the Ampol Public Website, in accordance with the Development Approval requirements. All documents relating to past development activities and the Kurnell Terminal remain posted on the Ampol Public website and can also be accessed via the following link:

[Kurnell Refinery Conversion Project](#)

1.4 Kurnell OEMP and Environmental Management Sub Plans - Objectives and Monitoring Requirements

The management plans prepared for the Site incorporate the mitigation measures specified in the EIS for Conversion and SEE for Terminal operations. Each management sub plan contains management actions, performance indicators and monitoring requirements.

1.4.1 Air Quality Management Sub Plan

The Air Quality Management Sub Plan aims to meet the following objectives:

- Implement all reasonable and feasible dust and odour mitigation measures to prevent and minimise odour and dust emissions from operations
- Prevent and minimise the air quality impacts of the Terminal during adverse meteorological conditions and extraordinary events;

- Minimise any visible off-site air pollution;
- Minimise surface disturbance of the Site, other than as permitted under this consent and Site's Environment Protection Licence (EPL 837);
- Compliance with air quality Conditions of Consent (CoC) and associated Management and Mitigation Measures (MMMs)
- Manage the community expectations regards the prevention of air quality impacts to their amenity

The key monitoring requirements for air quality are:

- Odour screening of potentially odourous excavated material;
- In the event of an odour complaint, an evaluation will be undertaken to confirm that the site is not a potential source of odours. If site operations and/or contractor work is confirmed as a potential ongoing odour source, additional mitigation measures will be implemented which may include the use of water sprays to suppress odours and, if necessary, the use of odour suppressants. In the event of ongoing odours, the source activities will be stopped wherever reasonably possible
- Asbestos fibre monitoring during excavations and other surface disturbances activities/area/s with the potential to generate air borne asbestos fibres
- Terminal Operations and contractor will carry out regular visual monitoring to identify equipment producing excessive visible emissions
- Terminal Operations and contractor will carry out regular visual monitoring to identify any area/s or work activities likely to generate airborne dust

NOTE: Refer to Part 3, Section 3.1.1 for details of the site's current Odour Reduction and Mitigation Strategy

1.4.2 Noise Management Sub Plan

The Noise Management Sub Plan aims to meet the following objectives:

- Prevent and minimise high noise generating activities during all operation (within safety limitations) at the Kurnell Terminal, Wharf and associated pipeline operations as well as other project works (as defined in Kurnell Terminal OEMP, Chapter 1 Introduction)
- Manage community expectations regarding noise emissions
- Compliance with the Site's Environment Protection Licence (EPL837) L5 noise limits and the NSW Noise Policy for Industry
- Compliance with noise Conditions of Consent (CoC) and associated Management and Mitigation Measures (MMMs)
- Compliance with relevant regulatory legal requirements (identified in the Site's OEMP, Appendix D)
- Work only carried out within the required hours and noise complaints managed in accordance with the Noise Management Sub Plan requirements.

Noise monitoring must be undertaken at the commencement of any work that has the potential to generate noise that could exceed the set EPL noise limits for the nearest residential sensitive receiver/s and at the nearest residential sensitive receiver downwind from the source.

The key noise monitoring requirements are:

- The *SoundScience Shipping Noise Monitoring (continuous) System* to monitor tanker ships berthed at the fixed berths (KUR1 and KUR2) installed at the Wharf
- During the initial stage of undertaking any high noise generating activities, and during where needed e.g. grit blasting (paint removal) in proximity (100m) to a specified residential receiver (R1-R8), noise measurement and monitoring will be carried.
- If high noise generating works are shown to exceed the set EPL noise limits and/or if noise complaints are received related to the high noise work, additional noise mitigation measures will be implemented for these activities (to ensure compliance with the set noise limits). These additional mitigations measures include:
 - The substitution of equipment or change the work procedure.
 - Acoustic screening wherever reasonably practical.
 - Changes to the start and finish work periods to reduce potential impacts to off-site nearest residential sensitive receiver to the source of noise and at the nearest residential sensitive receiver downwind from the source
 - Implement periodic breaks in undertaking high noise generating works. For example, working for 3 hours and stopping for 1 hour.
 - If noise complaints are received which are determined to be not associated with high noise generating work but do relate to the Site, additional mitigation measures should be undertaken, or noise monitoring undertaken.
 - Noise monitoring must be undertaken at the nearest residential sensitive receiver to the source of noise and at the nearest residential sensitive receiver downwind from the source. Thus, monitoring locations will vary dependent of any source of noise and the wind direction.

Note: Refer to the Site's Noise Management Sub Plan for specific monitoring and mitigation measures for shipping noise management.

1.4.3 Waste Management Sub Plan

The Waste Management Sub Plan aims to meet the following objectives:

- Minimise the potential for impacts of waste generated because of the Site's operations and maximise the reuse and recycling of waste materials produced wherever possible with the disposal of waste materials to landfill considered as the last resort where all other options have been investigated
- Store, handle, transport, and dispose of waste in an environmentally responsible manner to not cause harm or contamination to soil, air or water
- Compliance with the Site's Environment Protection Licence 837 (EPL 837) pertaining to waste management and relevant guidelines

- Compliance with waste Conditions of Consent (CoC) and associated Management and Mitigation Measures (MMMs)
- Compliance with relevant regulatory requirements (identified in the Kurnell Terminal OEMP, Appendix D)
- Manage community expectations around the responsible disposal of wastes
- No litter present on or around work areas

The key monitoring requirements for waste management are:

- Terminal operations and contractor activities to follow established waste segregation procedures to prevent cross contamination of the waste streams
- consider waste reduction strategies and existing controls as part of developing work methods, undertaking Job Safety Analysis and issuing of work permits
- Terminal operations to carry out inspections of its works areas to ensure any wastes, chemicals and hazardous materials are appropriately labelled, stored in accordance with dangerous goods and/or hazardous chemical requirements and all correct procedures are being implemented by employees and contractors

1.4.4 Soil and Water Management Sub Plan

The Soil and Water Management Sub Plan aims to meet the following objectives:

- Minimise the potential for impacts to surrounding water bodies and groundwater because of the Site's operations, includes the Right of Ways (ROW) and wharf areas;
- Describe the water management system on the site including both; storm water and oily water systems;
- Describe the potential soil and water issues associated with Terminal operations;
- Include measures for management soils that are excavated and stockpiled on Site;
- Identify water management and monitoring requirements for the Site;
- Demonstrate compliance with EPL 837 and prevent pollution of waters and soil at all times, as well as other relevant regulatory requirements (identified in the Kurnell Terminal OEMP, Appendix D)
- Compliance with soil and water Conditions of Consent (CoC) and associated Management and Mitigation Measures (MMMs)

The key monitoring requirements for soil and water management are:

- Work Permits must be issued prior to work in areas where potential soil and groundwater contamination exists or is suspected e.g. asbestos, Acid Sulphate Soil (ASS), etc.
- All stockpiles managed in accordance with the controls and mitigation measure detailed in the Plan, on work permits, work instructions and Job Safety Analysis
- Cover stockpiles where possible
- Inspection of all stockpiles for erosion and potential for dust generation

- Inspection of stormwater drains down gradient of work areas if erosion of stockpiles is observed
- No environmental pollution incidents
- Sampling of all excavations for asbestos and visual and olfactory screening for hydrocarbons, using a PID where appropriate
- Quarterly groundwater monitoring
- No significant increase in COPC levels in groundwater

1.4.5 Biodiversity and Weed Management Sub Plan

The Biodiversity and Weed Management Sub Plan aims to meet the following objectives:

- Minimise the potential for impacts to flora and fauna as a result of the Terminal's operations ('the Site') which includes the Right of Ways (ROW) and wharf areas;
- Provide an integrated approach to the management of pests, weeds and vermin on the Site
- Compliance with the Sutherland Shire Council (SSC) pest, vermin and noxious weeds management requirements
- Compliance with the Site's EPL 837, as applicable to the use of chemicals, such as pesticides and herbicides.
- Compliance with biodiversity and weed Conditions of Consent (CoC) and associated Management and Mitigation Measures (MMMs).
- Compliance with relevant regulatory requirements (identified in the Site's OEMP, Appendix D)
- Manage community expectations regards protecting the Marton Park Woodlands and Wetlands, as well as other remanent native bushland for which the Site is responsible for (custodian)

The key monitoring requirements for biodiversity, weed and pest management are:

- Undertake pre-works inspections for frogs in excavations or work areas and take appropriate actions if observed.
- undertake pre-works inspections for nesting shorebirds in work areas and take appropriate actions if observed
- Ensuring suitably qualified personnel are engaged to carry out the necessary pest (included vermin) and weed removal/mitigation activities, in line with the Pesticides Act 1999 and Pesticides Regulation 2017
- Suitable equipment, facilities, training, work practices and other necessary precautions will be taken to minimise impacts to the environment and the risk of pollution during weed spraying activities.

1.4.6 Traffic Management Sub Plan

The Traffic Management Sub Plan aims to meet the following objectives:

- No collisions caused by vehicles moving around site operations (including carpark areas)
- No vehicles incidents associated with Site access

The key monitoring requirements for traffic management are:

- Only permitting those vehicle deemed necessary to enable work to be undertaken in the operational areas of the Site
- Only allowing diesel driven vehicles into the operational areas of the Site
- Employees and contractors are inducted and have a valid driver's licenses to be able to drive into the operational areas of the Site
- Provision of sufficient parking facilities on-site for employee and contractor personnel, and heavy vehicles, to ensure that operational traffic associated with Site operations and any project works do not utilise public and residential streets or public parking facilities.
- Within the operational areas of the Site, vehicles will travel on designated roads where possible and be limited to a maximum speed of 10 km/hr in off-road areas, and 25 km/hr elsewhere, except cranes movements to be restricted to 15kms/hr.
- Provision of appropriate signage around the Site to communicate:
 - the speed limit,
 - parking locations within and outside the operational areas of the site,
 - "No Parking" areas,
 - "No Access" areas
 - designated traffic routes within and outside the operational areas
 - road names or numbers within the operational areas

1.4.7 Asbestos Contaminated Soil Containment Cell (ACS CC) Long Term Environmental Management Plan

The Asbestos Contaminated Soil Containment Cell (ACSCC) has specific management plans that were developed in 2020, as part of MOD2 requirements. It is called the Long Term Environmental Management Plan (LTEMP).

The CCLTEMP aims to meet the following objectives:

- Identify potential environmental impacts associated with the ongoing management of the closed containment cell, and
- detail the procedures in place to ensure the waste within the containment cell remains contained and does not present a risk to human health and the environment following closure.

This CCLTEMP details the ongoing environmental management of the ACSCC, including:

- Maintenance of the capping and drainage.
- Groundwater monitoring (including groundwater quality and levels).

The CCLTEMP also includes physical details of the pipeways source area including:

- Location of the marker layer across the entire pipeways area.
- Depth of excavations and the marker layer.

Note: The LTEMP is included as Appendix K in the Stage Two Final Kurnell Terminal OEMP.

1.4.8 Biosecurity Incident Response Management Plan

The Commonwealth Department of Agriculture, Water, and the Environment (DAWE) works to protect Australia's natural resources and heritage through regulating biosecurity preparedness and response arrangements. All aircraft, maritime vessels and military arriving in Australia through first point of entry (FPOE) must comply with the *Australian Commonwealth Gov't Biosecurity Act 2015*. *The Biosecurity Regulation 2016*, Section 58 provides for the control of biosecurity risks introduced by first point of entry operations, such as Ports.

The Kurnell Wharf is located to the west of the southern Kurnell Peninsula Headland and extends approximately 1 km into Botany Bay off Silver beach. It is the sole first point of entry (FPOE) for the Terminal's finished petroleum product imports. The Wharf is also used as a distribution point for some refined products, which are either shipped interstate or overseas. This area is used exclusively by Ampol for berthing and accessing of tanker ships to allow product unloading and loading to take place.

As a FPOE port, the Terminal is required to have in place a Biosecurity Incident Response Plan Management Plan and Shore Officer's trained in the detection and reporting of potential or actual biosecurity risks.

The Biosecurity Incident Response Management Plan (BIRMP) aims to meet the following objectives:

- manage the biosecurity risks associated with tanker ships and its cargo (bulk petroleum fuels)
- respond to and report biosecurity or human biosecurity incidents to the Port Botany Harbour Master and DAWR Biosecurity Officers
- support the Harbour Master and DAWR Biosecurity Officers to safely and effectively assess, inspect and treat goods and vessels under biosecurity control
- management the environment around the port of entry to reduce its receptivity to pests and diseases of biosecurity concerns
- management of biosecurity waste appropriately – refer to the Contain section and the Kurnell Terminal Shipping procedures

Nil amendments to the above-mentioned Management Sub-Plans were required in 2024.

The requirements detailed in the approved *Stage 2 Final OEMP*, inclusive of the Management Sub-Plans detailed above and the ACS Containment Cell LTEMP, applied to all aspects of site operations during the 2024 reporting period.

1.5 Development Activities For Next (2025) Calendar Year

The final phase (demolition and ACS CC construction/fill/cap) of the Kurnell refinery conversion to a finished product import and distribution terminal concluded on 31 March 2020. Therefore, there are no development activities (as defined in the SSD5544 Approval) planned for 2024 and beyond.

The Kurnell Terminal will continue to operate as a finished product import and distribution terminal with no significant site modifications planned at this point in time. Other planned project works at the Terminal include the continuation of the Pollution Studies and Reduction Programs (PSRPs) and Special Conditions (SCs) associated with the Site's Lic №: 837:

- **PRP U27:** Stormwater Pipe Investigations and Rectifications
- **PRP U28:** Stormwater Management System Upgrade
- **SC E16:** Remediation Strategy project work will continue throughout the upcoming year, operating under a number of Development Approval conditions issued by Sutherland Shire Council (SSC)
- **SC E17:** Tank Turnaround and Inspection (T&I) works – in accordance with the Tank Maintenance (includes Tank Sleeve installation works) program
- **SC E19:** Wastewater Treatment Plant Odour Abatement Program
- **SC E20:** PFAS Risk Monitoring and Remediation Works

And;

- SSD5544 (CC) D7/D8 Independent Environmental Audit
- Wharf Cathodic Protection Program will continue into 2025

PART 2 - 2024 Kurnell Terminal Environmental Monitoring And Performance

2.1 Terminal Operations During The Calendar Year

The Kurnell Finished Product Import and Distribution Terminal is the largest fuel terminal of its kind in Australia and continues to be a major supplier of transport fuels to NSW.

The Terminal continues to operate the site's Wastewater Treatment Plant (WWTP), which provides primary and secondary treatment, discharging treated aqueous effluent that meets the Site's EPL 837 licence conditions and set discharge limits for Sampling Point 27.

Refer to Tables 7A – 7F (five year period 2019 to end 2024 inclusive) for the EPL Monitoring Points 15, 16, 27, 28 and 29 parameters and environmental performance details.

2.2 Terminal Environmental Management System Controls

Kurnell Terminal operations are governed by a comprehensive Environment Management System (EMS), in line with the Ampol Operational Excellence Management System (OEMS). OEMS Element 13 - Environmental Management, lists the minimum expectations set for each Ampol business group and their listed facilities. The site also remains certified against ISO9001:2015 QMS and ISO14001:2015 EMS.

2.2.1 ISO1400:EMS and ISO9001:QMS

The site achieved recertification against ISO9001:2015 QMS and 14001:2015 EMS in May 2023 (certified by Lloyds Register) with nil non-compliances or opportunities for improvement identified.

Details of the recertification audit and most recent surveillance visit specific to the EMS Standard are as follows:

Table 2.1 Recent ISO Audits

2022 - 2024 Audit Dates	ISO14001:2015 Findings	
	No. of Non-Conformance (NC)	Opportunities for Improvement Identified (OFI)
SV3 – November 2022	Nil	Two
Recertification Audit - May 2023	Nil	Nil
Surveillance Visit No:1 – June 2024	Nil	Nil

Note: Prior Lloyds Register Quality Assurance (LRQA) ISO14001 reports are available on request. In late 2023, Ampol changed our certification providers from Lloyds Register to Compass Assurance Services, resulting in a change to the frequency of surveillance audit – from 9 monthly to annual visits.

With regards to the D7/D8 – Independent Environmental Audit (IEA), the Compliance team at the NSW DPIH was approached in May 2024 about the planned audit. Ampol asked the Department to consider changing the current three yearly audit cycle to a four yearly cycle, based on the maturity of the Kurnell EMS, the conclusion of all conversion works and previous IEA outcome. While the Department did not agree to changing the normal three yearly cycle, they did approve a deferral of the planned 2024 IEA by one year to 2025 (as a one off deferral). The D7/D8 IEA will follow on from the next ISO14001:EMS audit in mid-2025.

The Kurnell Terminal *Stage 2 Final* OEMP is supported by the Ampol Environment Policy, Ampol Operational Excellence Management System (OEMS) Element 13: Environmental Management minimum expectations, associated Group environmental standards and guidelines and Distribution specific environmental standards and guidelines documents that inform the site’s OEMP and Management Sub-Plans, as well as the ISO14001:2015 Standard.

The Site’s OEMP Management Sub-Plans document the relevant site specific environmental information, legal requirements/obligations and potential risk aspects and impact and controls pertaining to the terminal operations (includes wharf operations), as well as the recurrent project works e.g. Wharf Cathodic Protection Project; Tank Turnaround and Inspection (T&I) programs and Remediation project works (as they occur).

In addition, each Engineering project is required to have a specific Environmental Management Plan, in line with the requirements of CD3247 ‘Environmental Management Plan Design for Projects’.

2.2.3 Kurnell Terminal Environmental Protection Licence (EPL 837)

As stated earlier, the site’s environmental performance parameters are detailed in Environment Protection Licence (Lic №: 837). This licence describes the scheduled activities that are performed on the site, as well as the required environmental controls and monitoring activities. The monitoring section of the site licence describes six Monitoring or Discharge Points, as well as their set discharge and monitoring limits. Refer to Table 6. for details:

TABLE 2.2 Description of EPL 837 Monitoring and Discharge Points

EPA Identification No	Type of Monitoring or Discharge Point	Location Description
2	Discharge to waters	Submerged ocean outfall at Yena Gap labelled “2” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points” <u>Note:</u> Monitoring is undertaken at Point 27 for EPA ID No.2
15	Groundwater quality monitoring	Bioremediation plot (landfarm) – permanent monitoring well PWM 8 labelled “15” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points”

EPA Identification No	Type of Monitoring or Discharge Point	Location Description
16	Groundwater quality monitoring	Bioremediation plot – (landfarm) permanent monitoring well (PMW) 33 labelled “16” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points”
27	Effluent quality and volume monitoring	Sampling point in wastewater treatment plant labelled “27” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points” <u>Note:</u> Discharge from wastewater treatment plant at Point 2. (submerged ocean outfall at Yena Gap)
28	Groundwater quality monitoring	Pipe track 1- Asbestos Containment Cell – Permanent monitoring well labelled “28” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points”
29	Groundwater quality monitoring	Causeway - Asbestos Containment Cell – Permanent monitoring well labelled “29” on drawing No. 18588 titled “Environment Protection Licence EPA Identification Points”

Note: All monitoring points are indicated on Plot Plan A1-18588 titled “Environment Protection Licence Identification Points”, Version 6, dated 21 June 2018. Monitoring Points - refer to Appendix 3, Figure D.

Summaries of the monitoring results for each monitoring point are posted on the Ampol Public website. Details of the last six (6) years are included in this Annual Review report.

The pollutants monitored at these points; their licence concentration limits and monitoring results are presented as Tables in Section 2.3. The prevention of off-site noise, dust and offensive odours are licence and consent condition requirements. The site’s performance against these requirements will also be discussed as part of the overview of the calls made to the 24-Hour Community Hotline in Section 2.3 below.

2.3 Environmental Monitoring Performance

2.3.1 Terminal Monitoring Data

In this section, a summary is provided of the environmental performance of the Terminal against its Environmental Protection Licence No 837 and the SSD 5544 Conditions of Consent:

- Tables 7A - G show the summary of monitoring results for the licenced monitoring points 15, 16, 28 and 29 for the calendar years 2019 – end 2024
- some data is represented in Figures 1 to 4
- Tables 8A - 8C contains the annual (2024) summary of the monitoring results for Monitoring Point 27

- Table 9 contains a summary of the asbestos monitoring (air) results during Remediation Project works only.
- Table 10 and Figure 5 provide an overview of the calls made to the 24-Hour Kurnell Community Hotline

TABLE 7A – Licenced Monitoring/Discharge Points: 2024

Monitoring Period	2024								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.7	4.057	<0.001	<0.12	<0.11	<0.003
Highest	<0.001	<0.001	<0.001	6.7	6.179	<0.001	<0.12	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.0001	6.6	1.570	<0.001	<0.100	<0.11	<0.003
Highest	<0.001	<0.001	<0.001	7.4	2.908	<0.001	1.970	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7A – Continue

Monitoring Period	2024								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
	Point 28, ACMW01								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	7.2	0.338	<0.001	<0.12	<0.003	<0.003
Highest	<0.001	<0.001	<0.001	7.8	0.798	<0.001	0.400	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Point 29, ACMW03								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	0.180	6.000	<0.001	6.6	2.334	1.100	45.60	<0.11	21.000
Highest	0.400	7.700	<0.001	6.9	2.714	2.300	74.80	0.1	30.000
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7B – Licenced Monitoring/Discharge Points: 2023

Monitoring Period	2023								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.4	4.743	<0.001	<0.001	<0.003	<0.003
Highest	<0.001	<0.001	<0.001	7.9	5.884	<0.001	0.400	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	6.3	2.111	<0.001	0.390	<0.003	<0.003
Highest	<0.001	<0.001	<0.001	7.1	2.711	<0.001	4.330	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7B – Continue

Monitoring Period	2023								
	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
	Point 28, ACMW01								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	6.9	0.407	<0.001	<0.12	<0.003	<0.003
Highest	<0.001	<0.001	<0.001	7.6	0.797	<0.001	1.500	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Point 29, ACMW03								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.500	3.600	<0.001	6.1	2.306	2.000	29.80	<0.003	13.000
Highest	1.000	6.700	<0.001	7.0	2.867	3.000	71.20	0.161	26.000
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7C – Licenced Monitoring/Discharge Points: 2022

Monitoring Period	2022								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.4	4.025	<0.001	<0.12	<0.11	<0.003
Highest	<0.001	<0.001	<0.001	6.4	7.709	<0.001	0.40	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	6.6	1.569	<0.001	1.60	<0.11	<0.003
Highest	<0.001	<0.001	<0.001	7.4	2.711	<0.001	3.18	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7C – Continue

Monitoring Period	2022								
	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
Point 28, ACMW01									
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	7.4	0.383	<0.001	<0.12	<0.11	<0.003
Highest	<0.001	<0.001	<0.001	7.9	0.668	<0.001	0.30	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Point 29, ACMW03									
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	0.900	4.900	<0.001	6.6	2.534	3.000	53.70	<0.11	19.000
Highest	3.200	14.000	<0.001	7.1	2.867	11.000	77.40	0.15	52.000
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7D – Licenced Monitoring/Discharge Points: 2021

Monitoring Period	2021								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.3	3.225	<0.001	<0.12	<0.05	<0.003
Highest	<0.001	<0.001	<0.001	5.7	4.485	<0.001	0.12	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.3	1.68	<0.001	0.08	<0.05	<0.003
Highest	<0.001	<0.001	<0.001	6.2	2.087	<0.001	1.70	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7D – Continue

Monitoring Period	2021								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
Point 28, ACMW01									
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	6.2	0.347	<0.001	<0.10	<0.05	<0.003
Highest	<0.001	<0.001	<0.001	7.8	0.855	<0.001	1.10	<0.11	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Point 29, ACMW03									
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	1.800	6.600	<0.001	5.7	2.398	8.600	19.80	<0.05	28.000
Highest	4.000	9.400	<0.001	7.3	2.679	12.000	73.00	<0.11	34.000
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7E – Licenced Monitoring/Discharge Points: 2020

Monitoring Period	2020								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.6	3.378	<0.001	<0.10	<0.05	<0.002
Highest	<0.001	<0.001	<0.001	5.7	4.265	<0.001	0.13	<0.10	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.8	1.565	<0.001	0.02	<0.05	<0.002
Highest	<0.001	<0.002	<0.001	7.0	2.106	<0.001	0.20	<0.10	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7E – Continue

Monitoring Period	2020								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
	Point 28, ACMW01								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	6.6	0.170	<0.001	<0.10	<0.05	<0.002
Highest	<0.001	<0.001	0.009	7.5	0.531	<0.001	0.50	<0.10	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Point 29, ACMW03								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	1.300	2.800	<0.001	6.2	2.201	6.500	49.92	<0.10	11.000
Highest	3.200	8.100	<0.001	7.0	2.938	18.000	110.70	0.13	43.000
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7F – Licenced Monitoring/Discharge Points: 2019

Monitoring Period	2019								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.11	4.100	<0.001	<0.100	<0.050	<0.002
Highest	<0.001	<0.002	<0.001	5.70	4.937	<0.002	<0.100	<0.050	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.59	1.905	<0.001	0.040	<0.050	<0.002
Highest	<0.001	<0.002	<0.001	6.50	2.360	<0.002	0.290	<0.050	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 7F – Continue

Monitoring Period	2019								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
	Point 28, ACMW01								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.92	0.200	<0.001	0.700	<0.002	<0.002
Highest	<0.001	<0.002	<0.001	7.17	0.552	<0.002	1.500	<0.050	<0.003
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Point 29, ACMW03								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	1.700	6.710	<0.001	6.12	2.284	15.00	1.600	<0.050	34.40
Highest	3.700	9.200	0.002	6.56	2.392	16.00	106.3	0.120	43.00
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Lowest and highest pH, Standing Water Levels and Total Recoverable Hydrocarbon levels have been depicted in Figures 1 to 4 for Monitoring Points 15, 16, 28 and 29 respectively. Results below the detection limit of the lab’s analytical tests have not been depicted in a graph.

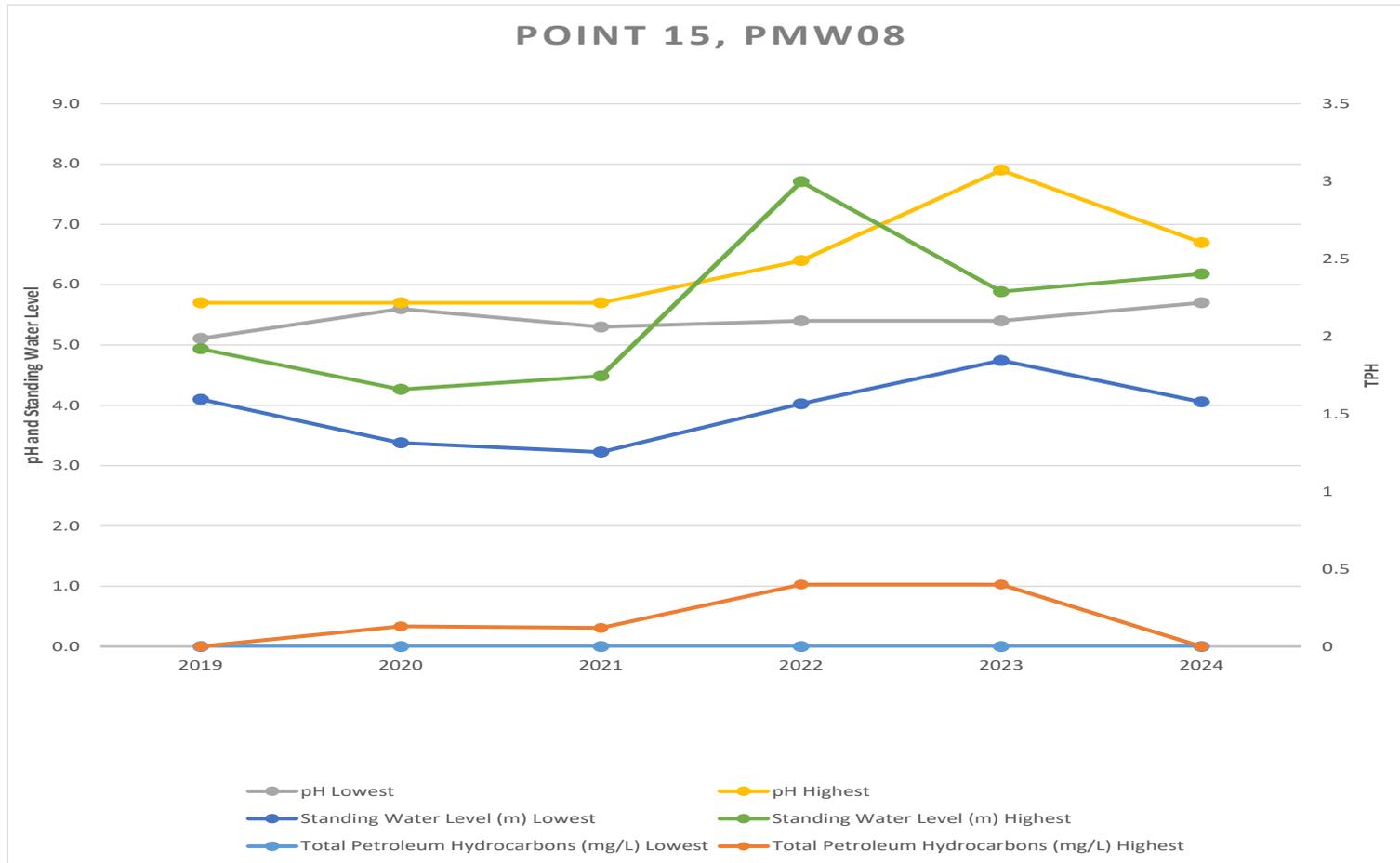


Figure 1. Monitoring Point 15 Data – 2019 to 2024

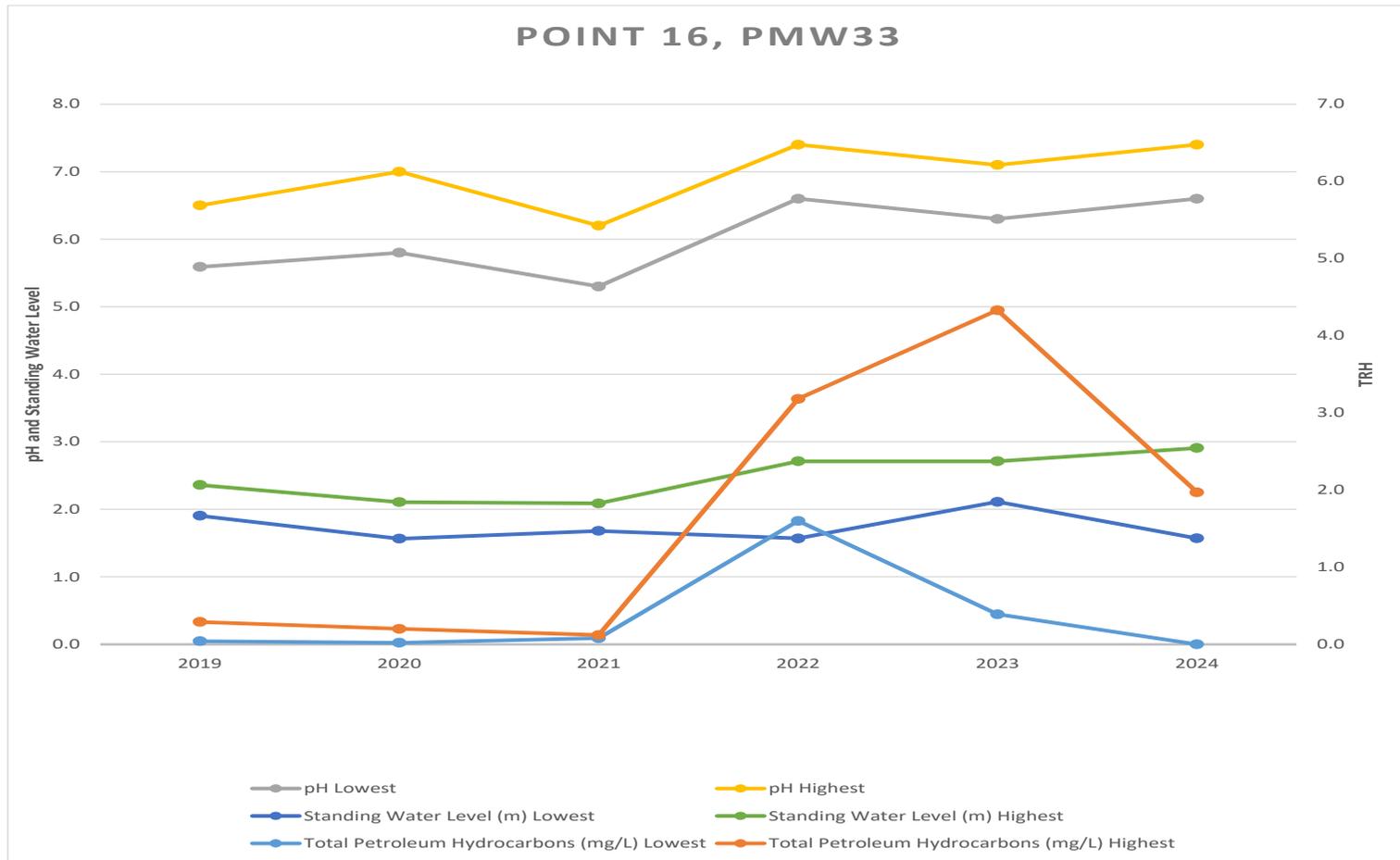


Figure 2. Monitoring Point 16 Data – 2019 to 2024

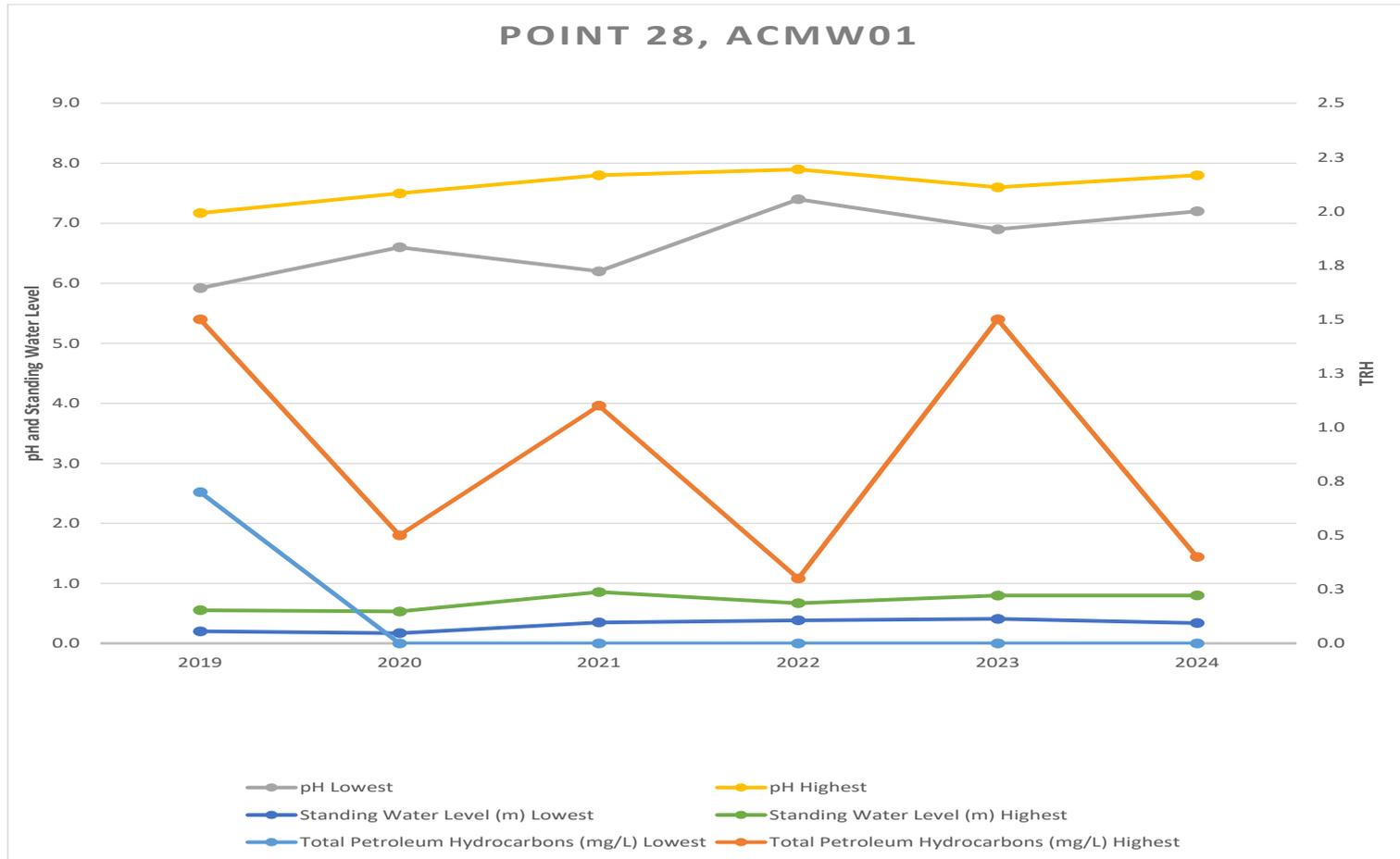


Figure 3. Monitoring Point 28 Data – 2019 to 2024

Note: Well ACMW01 was established in 2018 as part of the development of the asbestos containing soil containment cell.

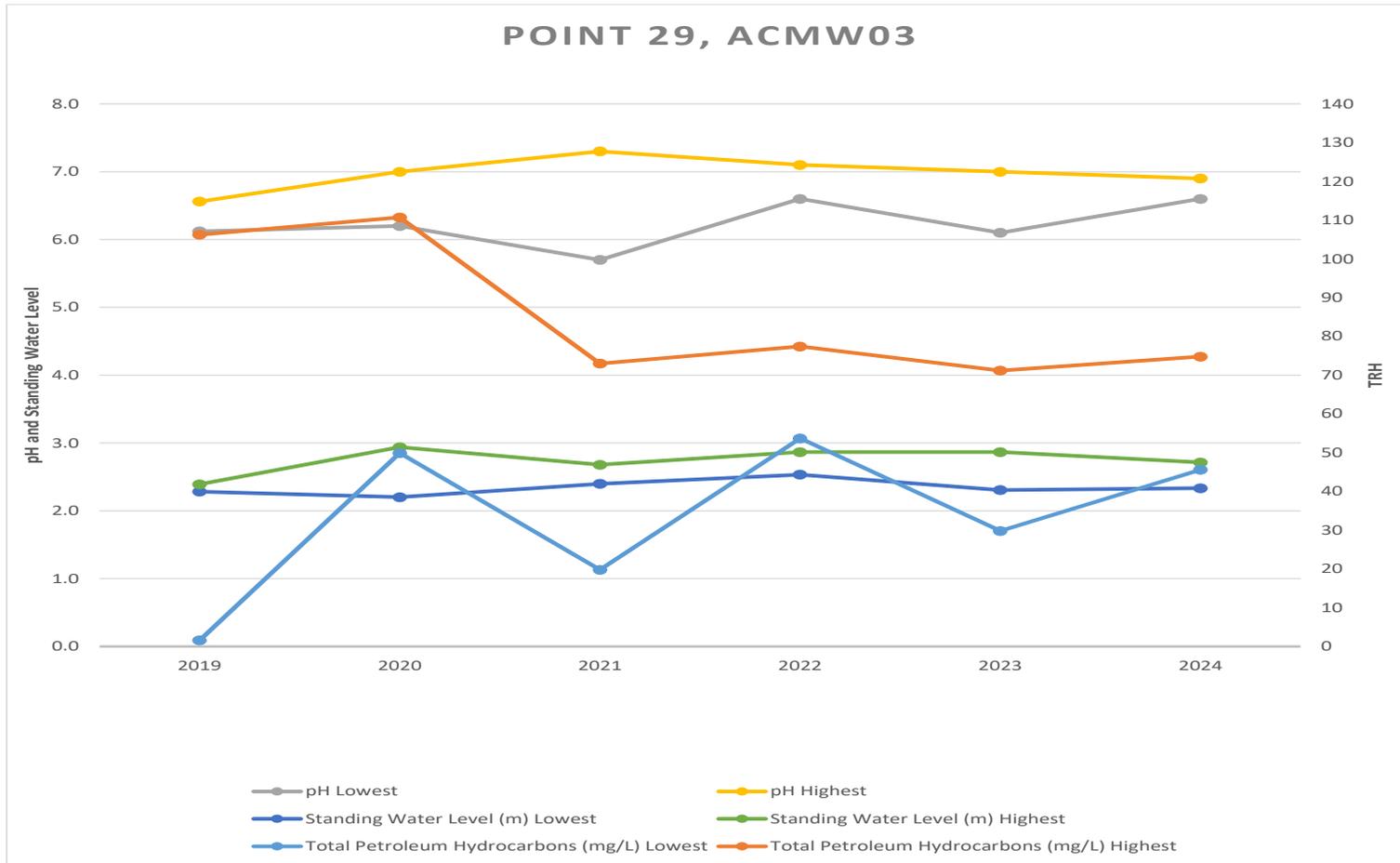


Figure 4. Monitoring Point 29 Data – 2019 to 2024

Note: Well ACMW03 was established in 2018 as part of the development of the Asbestos Contaminated Soil (ACS) Containment Cell.

Table 8A – Point 27: Normal Operation Conditions

Monitoring Period	2024									Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Normal Operating Conditions									
Pollutant	Temperature	pH	Volumetric Flowrate	Oil and Grease	Phenols	Sulfide (un-ionised hydrogen sulfide)	Nitrogen (ammonia)	Total Suspended Solids	Biochemical Oxygen Demand	
Unit of Measure	°C	pH units	kl/day	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Licence Limit	40	6.0 - 9.0	None		2.7	None				
Monitoring Frequency Required by Licence	Continuous			6 Day						
Averaging Period	1 Hour Block	6 Minute Rolling	1 Day Block	Grab Sample						
No. Samples Collected	8784	527040	366	0	0	0	0	0	0	
Lowest	13.2	6.4	0							
Highest	27.3	8.5	11489							
Exceedance (yes/no)	No	No	N/A	No	No	N/A	No	No	No	
										No Missing Data

Table 8B – Point 27: Normal Operation Conditions

Monitoring Period	2024										Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Normal Operating Conditions										
Pollutant	Arsenic	Ethyl Benzene	Lead	Naphthalene	Nickel	Phenanthrene	Benzene	Toluene	Polycyclic Aromatic Hydrocarbons	2,4-Dimethylphenol	
Licence Limit		None		None		None	None	None	0.5	None	
Unit of Measure	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Monitoring Frequency Required by Licence	Monthly										
Averaging Period	24 Hour Composite Sample										
No. Samples Collected	12	12	12	12	12	12	12	12	12	12	No Missing Data
Lowest	<0.001	<0.002	<0.001	<0.0002	<0.001	<0.0002	<0.001	<0.002	<0.0024	<0.0002	
Highest	0.003	1.24	0.001	0.0327	0.003	0.0013	0.292	0.72	0.0326	0.1740	
Exceedance (yes/no)	No	N/A	No	N/A	No	N/A	N/A	N/A	No	N/A	

Table 8C – Point 27: Wet Weather Bypass Conditions

Monitoring Period	2024				Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Wet Weather Bypass Conditions				
Pollutant	Oil and Grease (Wet)	Phenols (Wet)	Total Suspended Solids (Wet)	Biochemical oxygen demand (Wet)	
Unit of Measure	mg/l	mg/l	mg/l	mg/l	
Licence Limit	70	5	100	350	
Monitoring Frequency Required by Licence	Daily during Wet Weather Bypass				
Averaging Period	Grab Sample				
No. Samples Collected	182	182	182	182	Maintenance Bypass was used during the whole year whilst the Biotreater was offline for essential maintenance.
Lowest	<5	<0.05	<5	3	
Highest	21	0.56	34	114	
Exceedance (yes/no)	No	No	No	No	

Table 9: 2024 Terminal Remediation Project Works - Asbestos Monitoring Results

Location	No. of Samples Collected 2024 Period	NSW SafeWork >0.02 Fibres/millilitre of air sampled	NSW Depart Health & Ampol Action Level >0.01 Fibres/millilitre of air sampled
CBOX	13	nil	nil
Central Control Building to Plant 33	7	nil	nil
Comms pit adj. Road P	1	nil	nil
Compound 2	27	nil	nil
Compound 3	113	nil	nil
Cooks room	2	nil	nil

ANNUAL REVIEW 2024
ENVIRONMENTAL PERFORMANCE

Location	No. of Samples Collected 2024 Period	NSW SafeWork >0.02 Fibres/millilitre of air sampled	NSW Depart Health & Ampol Action Level >0.01 Fibres/millilitre of air sampled
Fire break	3	nil	nil
Flare area	3	nil	nil
Former Plant 45 Machine shop	7	Nil	nil
Former substation	5	nil	nil
Gate 5	18	nil	nil
LPG	1	nil	nil
Miscellaneous Fire Line	3	nil	nil
New Lease Area	3	nil	nil
Nitrogen Plant Unit / Plant 33	61	Nil	nil
North Old Land Farm	2	nil	nil
Pipe track 3	9	nil	nil
Pipe track C	17	nil	nil
Pit A	1	nil	nil
Pit B	30	nil	nil
Road 3 West	1	nil	nil
Road G	1	nil	nil
Scrapyard	9	nil	nil
South of Road N	1	nil	nil
Stormwater project - SEPS	135	nil	1
T101	1	nil	nil
T166	2	nil	nil
T214-T215	2	nil	nil
T216-T217-T218	2	nil	nil
T325-T327	1	nil	nil

Location	No. of Samples Collected 2024 Period	NSW SafeWork >0.02 Fibres/millilitre of air sampled	NSW Depart Health & Ampol Action Level >0.01 Fibres/millilitre of air sampled
T328-T353-T354-T330	1	nil	nil
T512	3	nil	nil
T611	1	nil	nil
T622 bund	3	nil	nil
T623	2	nil	nil
Tank 1	29	nil	1
Waste bays	8	nil	nil
Total	528	0	2

Notes:

1. Air monitoring carried out by Consultant Occupational Hygienist during remediation project works involving excavation and removal of asbestos contaminated soils. All such works carried out by Class A licenced contractors.
2. Asbestos monitoring specific to the Remediation project areas will vary from year to year.

As can be seen from the range of monitoring data above, the site remains in compliance with EPL 837 set licence limits and the relevant SSD5544 consent conditions.

While there were two episodes when a ACM detect was observed, notifications to SafeWork NSW are only required when the result is reported as >0.2 f/mL

2.3.2 Terminal 24 Hour Kurnell Community Hotline Analysis

During the 2024 reporting period, the 24-Hour Kurnell Community Hotline received thirty seven (37) calls. The following Table shows the breakdown of these calls, based on the category of the complaint:

Table 2.3 2024 Community Hotline Monitoring – Nature of Calls

Number of Call Recorded During the Last Twelve Months	
Pollution Complaint Category	Number of Calls
Odour & Air	26
Water	0
Noise	8
Fallout & Waste	0
Miscellaneous	3
Total	37

Note: Miscellaneous calls related to enquiries and concerns that did not fall into the main categories above.

In line with the site’s complaints and incident investigation procedures, such calls are followed up immediately with an ‘in the field’ investigation into the potential cause of the complaint and a discussion with the complainant to gather more details (if possible). All investigations are tracked in the Ampol LPS Database to completion of assigned actions, where required. The outcome of the investigation and the actions taken is provided either by a face-to-face meeting, or during a follow up phone call to the complainant. Figure 5 shows the breakdown of the community feedback/complaints by month over the reporting period.

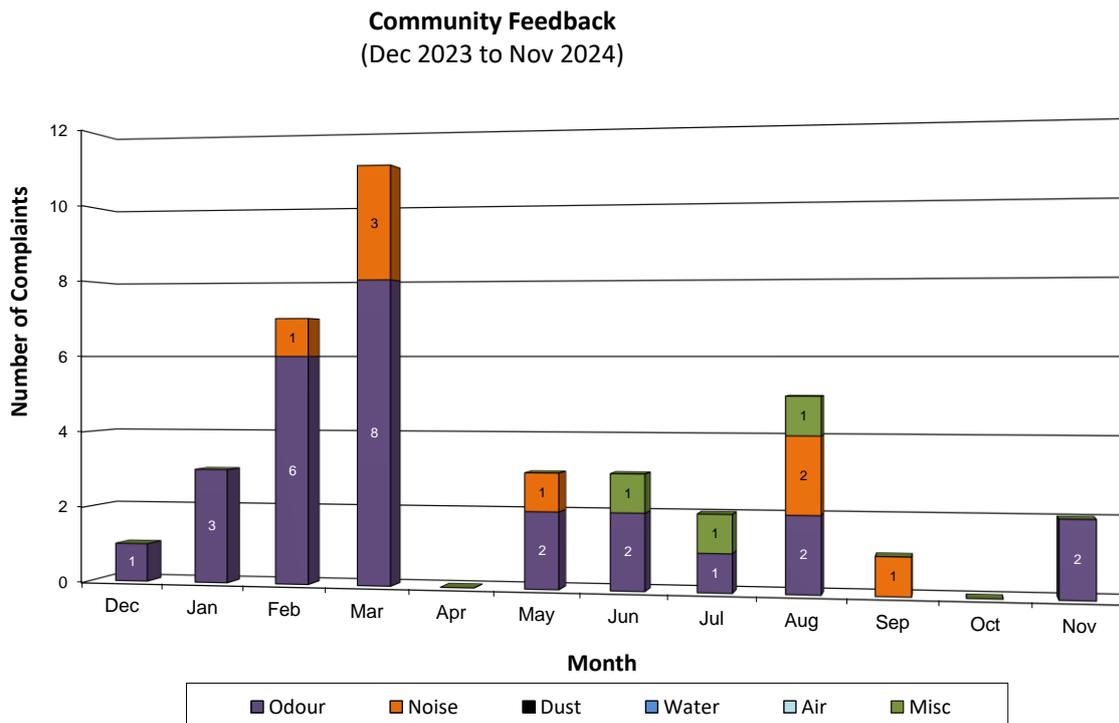


Figure 5 2024 Community Hotline Monitoring – By Month

Figure 6 shows the year on year comparison (2020 to 2024) of the number and type of community feedback/complaints received.

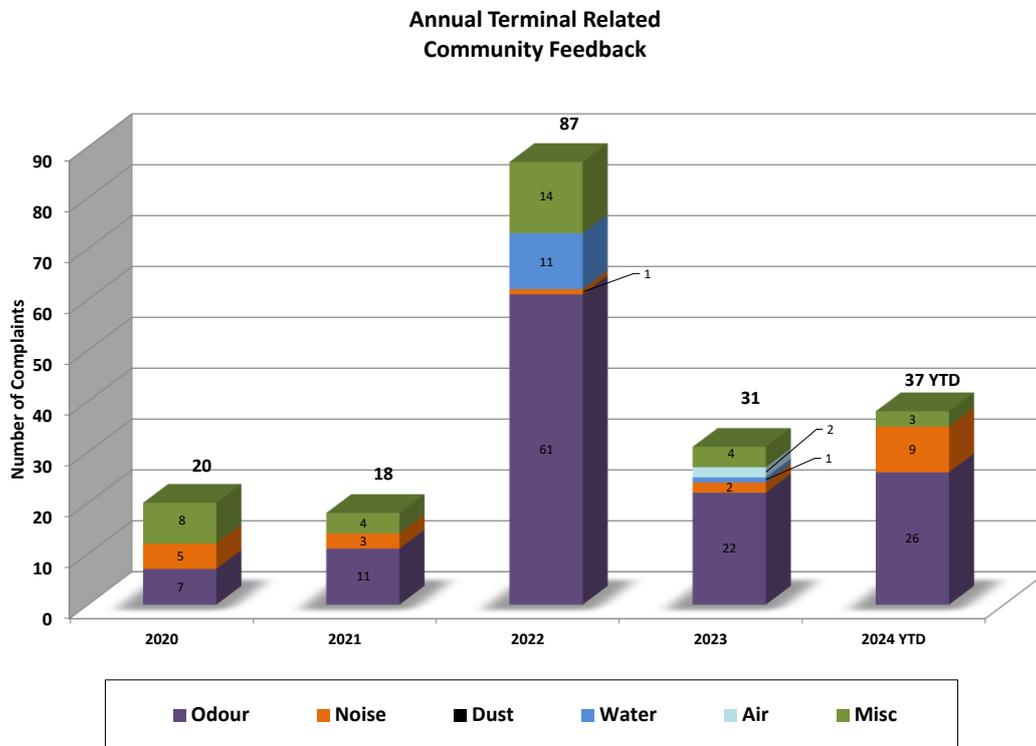


Figure 6 Annual Terminal Related Community Feedback/Complaints

It is pleasing to report a significant reduction in the nature and number of community feedback/complaints in 2024, when compared to the 2022 spike in complaints following the Kurnell flood event on 7 April 2022, as shown in Figures 5 and 6 above.

Although the twenty six (26) calls/complaints regarding perceived odour represent a significant reduction when compared to the sixty one (61) calls/complaints in 2022, they continue to be the main reason for calling the Kurnell Terminal Community Hotline. The community’s main odour concerns related to:

- While there were six (6) hydrocarbon odour complaints from residents living near Gate 5 area of the site or near the northern Tank bunds this year, it is a significant reduction from 2023 when there were twelve (12) odour complaints. These types of odour complaints were generally received during periods of heavy rain and high southerly wind events and/or following Tank “water draw” tasks. Localised pooling of stormwater can lead to hydrocarbons to emerge from the oil-water sewer on site, leading to the emission of odours. This pooling of stormwater can occur across the site in bunded areas but is more prevalent in the northern area of the site. Maintenance actions focused on inspection, clearing and cleaning of the stormwater drains in the 100 Series Tank bunds has helped with a reduction in odour complaints in that area.

- Three (3) hydrocarbon odour complaints came from residents/businesses in Cook St, also located near the 100 Series Tank bunds.
- Eleven (11) odour complaints were received from property owners living in and around Tasman St and Captain Cook Drive near the Kurnell Recreation Club. The wetlands area leading to Quibray Bay sits behind Tasman St and is known to be odourous during low tide and sustained dry spells.
- Three (3) odour complaints related to scaffolding (covered in dried crustation) being stored in the ROW Contractor compound, described as “dead sea life”.
- Three (3) hydrocarbon odour complaints related to a ship generating odourous smoke at the fixed berth in February (reported to NSW EPA)

All odour complaints received, either via the Ampol’s 24-Hour Community Concerns Hotline or via other sources e.g. NSW EPA, were investigated in an effort to define the source of the odour and to take appropriate mitigating actions.

Refer to Section 2.4 for details of discussions with NSW EPA, the affected residents and the operational mitigation measures taken to address these odour complaints, as well as additional Pollution Studies and Reduction Programs and Special Conditions included in the Site’s EPL (dated 9 Nov 2024).

There were five (5) ships reported to the NSW EPA for exceeding the night-time noise limit of 50 dBA (EPL 837 - Limit Condition L5) in the December 2023 - end November 2024 period and four (4) community complaints made about perceived shipping noise (though the ships in question were operating under the night-time noise limit at the time of three (3) of these complaints. The other four (4) noise complaints made in 2024 related to plant/equipment used for a short periods during project work in the terminal and ROW compound opposite the wharf.

The number of miscellaneous enquires also reduced – thirteen (3) in 2023 and three (3) also in in 2024. They related perceived appearance of the Terminal site, question re use of the ROW laydown areas to store scaffolding, etc.

As stated earlier in this report, all community complaints were investigated immediately and appropriate actions were implemented. Feedback was provided to the complainant regarding the cause of the potential impact and the actions taken to prevent it from happening again.

In line with the *Ampol Group Incident Notification and Investigations Standard* (CD3824), all complaints, any investigation into possible cause/s and all findings and actions are recorded in the Ampol Loss Prevention System (within Cintellate), as well as communicated to the complainant.

2.4 Terminal Environmental Non-Compliance And Corrective Actions

While there were continuing issues with perceived odour complaints (26) in 2024, based on the environmental monitoring data, the community complaints data and the five (5) tanker

ships reported to exceed the night time noise limits (as discussed in the previous section), there were no other non-compliances against any other SSD5544 conditions of consent specific to the Terminal operations, or EPL 837 limits or operating conditions.

A total of seventy six (76) tanker ships were received at the Kurnell Terminal during the 2024 period. Five (5) tanker ships) was identified and reported as having exceeded the Kurnell Terminal EPL 837 night-time noise limits during the 2024 period, with four (4) shipping noise complaints received this year (three (3) when the ship was operating under the noise limit). This continues to be an excellent result when compared against the total number of ships berthed in the 2024 period.

As per the Site's established process, these exceedance event was investigated and reported to the Ampol Marine Assurance and Vetting teams, in line with the agreed shipping performance process. NSW EPA were also notified via an agreed email proforma.

Sustained year-on-year shipping noise abatement improvements have been achieved since the commissioning of the SmartaData SoundScience Noise monitoring system in October 2018, that is 2019 (15 tanker ships), 2020 (12 tanker ships); 2021 (2 tanker ships), 2022 (3 tanker ships), 5 tanker ships in 2023 and 5 tanker ships in 2024. These results demonstrate the continued operational value of the shipping noise monitoring system in the early potential exceedences detection and correction and strict expectations on visiting tanker ships to employ noise controls measures to prevent ship exceedances against the Kurnell Terminal EPL 837 night-time noise limits of 50 (dBA).

Note:

NSW DPE (Laura Papoulias) confirmed in writing (12 September 2022) that the Department no longer require Ampol to notify them of tanker ship night-time noise level exceedences. Incident reporting under Approval SSD5353 (Berthing Upgrade), D8 does not appear to include limit exceedences, therefore there is no requirement to submit incident notifications/reports to the Department that relate to the site's berthing area nor include details of specific ship noise exceedence events and corrective/preventative actions taken by Kurnell Terminal Marine operations.

2.4.1 Perceived Odour Complaints:

As stated in the 2023 report, the Kurnell site has a long history of this type of complaint, more so during the operation of the refinery. While we are unable call up community complaint data from the earlier period of the refinery, such records have been collected since 1998.

On average, seventy (70) perceived odour complaints were received per year during the refinery period 1998 to September 2014. Interestingly, in the years associated with significant incidents impacting the community, the site experienced significant upswings in perceived odour complaints, for example 178 in 2006; 159 in 2010, 59 post the flood event in April, 2022.

By comparison, since the commencement of full Terminal operations in late 2014, there has been an average of twenty (20) perceived odour complaints per year during the terminal's operating period 2015-2024. Taking into account 2024, there has been an average of twenty one (21) perceived odour complaints per year during this period, taking into account all complaints received following the 2022 separator overflow incident associated with the flooding of the site and surrounding areas.

A sustained effort continues to be made on odour abatement and mitigation measures during "at risk" activities such as tank water draws, wastewater treatment plant operations and remediation works involving hydrocarbon soils, etc. during the 2024 period

The Terminal Operations Manager and the National Environment Manager, Distribution have worked closely with odour specialist consultants and the NSW EPA representative to investigate the potential contributing site aspects and work on an odour abatement and mitigation plan to ensure offensive odours do not leave the site.

Starting in mid-2021, we completed a review of the sewer system around the northern Tank bunds and completed the cleaning out of the drains in these bunds and associated cleaning of the sewer system pits outside these bunds. This ensured the sewer systems remained cleared and flowed efficiently to the site's Waste Water Treatment Plant. The assessment and cleaning program was extended to all drains and sewer pits on site during 2024 as well. Particular attention had been given to investigating and characterising the observed source of potential hydrocarbon odours and sheens at the stormwater outlet adjacent to the wharf in the 2022 - 24 period. Follow up sampling and investigations at the stormwater drain adjacent to the wharf identified low concentrations of hydrocarbons at levels below relevant marine and health guidelines. During the period following the flood event in 2022, With the support of the then newly appointed Community Engagement Manager, the Operations and Environment teams worked alongside the EPA and a Kurnell community working group to determine the best course of action, which as a first step, was the initiation of a detailed monitoring program. A detailed odour assessment was then conducted on site by an accredited consultant team, specialising in this area of environmental science. The recommendations arising from the final report have been progressively implemented.

Continuing in 2024, Ampol has put the following odour abatement and mitigation measures in place:

- We have continued with the regular odour surveys around our boundary to establish areas of potential concern. These surveys are conducted during southerly wind events, after rain events and other tasks known to potentially generate odours..
- Tank water draws are a necessary operational task but the Operations team endeavour, where possible, to undertake the task in optimum weather condition - dry and winds from the north. Additionally, in 2024, instrumentation (Coriolis meter) has been installed on water draw outlets of the northern gasoline tanks (102, 103, 104) to minimise hydrocarbon release. The Coriolis meter is installed on the tank outlet piping which detects the change in density (when water changes to hydrocarbon) and closes the valve. Currently it is a manual process where operators must use their skills and experience (judgement) as to when to close the valve. The commissioning of these Coriolis meters is planned to be completed by 1Q 2025. To further support the water draw task, a [Vaporgard](#) (odour abatement) system is currently being installed at northern gasoline tanks with the aim to neutralise, and destroy, any airborne odour particles in this area. Installation is already underway, with commissioning planned for 1Q 2025
- We have continued to use an approved industrial deodoriser in and around the northern Tank bunds to suppress potential odours and other areas on site, as and when required. It is expected the two initiatives mentioned above will further reduce the need to use the approved industrial deodoriser in this area. An updated oily water sewer system inspection program is now in place. This program ensures that the sewer systems around the Terminal are inspected at regular intervals and that silting up of the sewer drains and pits is minimised and thus does not have the potential to generate odours.

As a result of ongoing discussions between Ampol and the NSW EPA, a new Pollution Studies and Reduction Program titled **PRP U27: Stormwater Pipe Investigations and Rectifications** is aimed at driving further reduction in odours being generated from the site and has been included in the latest variation of the Site's EPL 837, specifically:

The objective of this program is to:

- I. complete stormwater pipe re-lining works in an attempt to reduce hydrocarbon concentrations in stormwater discharges and monitor the success of these works;
- II. assess feasible measures to remove the hydrocarbons from the stormwater discharges; and
- III. if necessary, undertake an assessment of further options to reduce hydrocarbons in stormwater discharge and any odours generated as a result.

The NSW EPA added another Special Condition (SC E18) titled **Waste Water Treatment Plant (WWTP)- Odour Reduction Program** to the Site's EPL 837 in 2023, aimed at reducing the likelihood of odour generation from the separator pits. There were two requirements include in the SC, namely:

- install activated carbon filters to the tops of all exhaust pipes at the separators

- install a cover over pit MH72

The SC required the Site to have completed the works and provide the EPA with written confirmation that the work had been completed by 22 September 2023. Ampol was able to report that this SC was met by the due date.

In addition to the improvements above, the following project work was started at the Waste Water Treatment Plant in 2024:

- a [Vaporgard](#) (odour abatement) system is also being installed at WWTP with the aim to neutralise, and destroy, any airborne odour particles in this area. Installation of the system is already underway, with commissioning planned for 1Q 2025
- In the meantime, a fragranced “misting” system has been in service at the retention basin since June 2024, as an interim control
- Fibre reinforced plastic (FRP) covers are currently being installed on the retention basin to mitigate odour release. Installation is expected to be completed in early 2025
- Upgrade of wet oil sump pumps at the WWTP, to improve pump out efficiency of waste from the WWTP’s primary treatment area

2.4.2 Community Engagement

Ampol (formerly named Caltex) has a long-established relationship with the Kurnell community, local businesses and emergency services. In recent years, the community expectations have continued to rise in terms of Ampol’s operations and potential impacts to the local environment and residents.

Ampol has strengthened its relationship with the community by proactively implementing the following activities.

- Appointment of a Community Engagement Manager
- Bi-monthly distribution of an Ampol Community Update newsletter providing information on terminal operations, maintenance projects, community support and ways to contact the terminal.
- The continuation of residential bore monitoring program for PFAS investigations and environmental due diligence.
- Attendance to Kurnell Progress, Precinct and Resident Association meetings when available.
- Continuation of community sponsorship activities that provide support and build capability within local groups and organisations.
- First nation engagement activities to fulfil commitments in RAP.

Continuation of the community notification platform to be provide local residents (who opt in) with initial alerts and information and the unlikely event of a major incident at the terminal

Note: Advice around evacuation and other actions remain the responsibility of emergency services and the community are advised to follow their directions at all times.

The Terminal Operation Manager and National Distribution Environment Manager remain in regular contact with the NSW EPA to report on the progress of the mitigation plan and to report any new odour complaints.

2.4.3 April 2022 Flood Incident - Additional Measures taken by NSW EPA

As a reminder, on the evening of 6 April 2022 and in the early hours of 7 April 2022, an extreme weather event occurred in Kurnell. Heavy rainfall and other environmental factors led to floodwaters inundating the area of the Waste Water Treatment Plant (WWTP), causing hydrocarbon contamination to rise out of the separators and sumps and mix with the stormwater. The hydrocarbon contaminated stormwater then travelled off the premises and spilled to locations including but not limited to Captain Cook Drive and Solander Street, impacting the surrounding environment and Kurnell community.

As a result of the Incident, hydrocarbon-impacted floodwaters were introduced into Marton Park Wetland, two adjoining unnamed creeks, stormwater drains along Captain Cook Drive, a culvert and drain linking Marton Park Wetland and Quibray Bay (including the mangroves of Quibray Bay) (**the Waters**).

Ampol accepted full responsibility for all contributing factors to the incident that were within our control, and deeply regrets the impact the incident has had on the Kurnell community and the environment.

In response to the incident, we then undertook extensive clean-up works to remediate the impacted lands and waterways.

In light of the 2022 Flood incident, Ampol and the EPA also recognise the possibility of continuing adverse weather events need to be considered with improvements in stormwater management on site imperative. Another detailed hydrologist study of the site was completed in 2022, the results of which allowed Ampol Engineering, Kurnell Operations and the National Environment Manager, Distribution to identify a series of upgrades to the stormwater management system at the premises, which they predicts will prevent a similar flood incident from reoccurring. These upgrades, which were presented to the EPA, are primarily designed to:

- Provide upstream retention of stormwater to mitigate the risk of overland flow and flooding of the waste water treatment plant; and
- Maintain segregation between stormwater and oily water systems at the waste water treatment plant.

As a result of ongoing discussions between Ampol and the NSW EPA, an additional Pollution Studies and Reduction Program titled **PRP U28: Stormwater Management System Upgrade** was also included in the latest variation of the Site's EPL 837 to drive the identified improvements. They are:

- Install a levee wall around the waste water treatment plant including the separator bays, retention basin and wet/oil pits, to prevent flooding and hydrocarbon loss of containment during periods of high rainfall. The levee wall must be designed such that it would prevent the loss of hydrocarbons in a 1 in 500 year flood event.
- Construct and install:
 - a) A new automated pumping station at the B1A basin to divert stormwater to bund 622 for storage during periods of high rainfall; and
 - b) A new automated pumping station at the intermediate separators to divert stormwater from the intermediate separator to bund 602 for storage during periods of high rainfall.
- Install new automation controls on the existing pump at MH72 oily water sewer, and;
- Provide to the EPA a procedure that outlines the new stormwater systems, processes of training, maintenance and procedures during heavy rainfall.

It is pleasing to report that all the above-mentioned PRP requirements have been met with the provision of monthly reports back to the NSW EPA on the progress of these PRP initiatives.

2.4.3.1 Quibray Bay Mangroves Cleanup Notice No: 3505381

Related to the April 2022 Flood incident, new information was made available to the NSW EPA by a Georges Riverkeeper member and NSW Fisheries in relation to the health (observed dieback) of mangroves in Quibray Bay (adjacent to the Kurnell Terminal). It was already established that hydrocarbon-impacted floodwaters were introduced into this area via a drain linking Marton Park Wetland and Quibray Bay as a result of the flood incident.

The NSW EPA issued Ampol with Clean-up Notice (CUN) No: 3505381 on 16 August 2023 that directed Ampol to engage an independent and suitably qualified environmental consultant with expertise on mangrove management to undertake the following:

- a) Develop and implement a monitoring plan to ascertain the nature and extent of hydrocarbon contamination in the Mangrove Area impacted by the flood incident
- b) Carry out a detailed assessment the impact of the flood incident on mangrove health in the Mangrove Area.
- c) Based on the outcomes of the monitoring pan and assessment works, provide recommendations on clean up, monitoring, remedial and/or mitigation actions to remove hydrocarbon contamination caused by the pollution incident in the Mangrove Area and to remediate mangroves any areas within the Mangrove Area where mangrove health was impacted by the incident.

WSP, Environmental Consultants, were engaged to undertake the works, specifically the NSW EPA approved WSP ecologist consultant specialising in mangrove health and management.

The necessary monitoring and assessment works have been completed and a report prepared to meet the following requirements:

1. The results of the monitoring plan, as outlined above in a)
2. The results of the mangrove health assessment, as outlined above in b)
3. Recommendations regarding the clean-up, remedial and/or mitigation actions in the Mangrove Area as outlined above in c) (the Consultant Report)

The Environmental Consultant (WSP) and Ampol presented the results of the assessment to the EPA on 16 May 2024 and Ampol submitted the required Assessment report to the EPA on 28 May 2024.

WSP and Ampol also presented the results of the assessment to the Sutherland Shire Council and Georges River Keeper on 18 June 2024.

The assessment did not identify evidence of residual hydrocarbons associated with the oily water overflow (April 2022) in the mangrove environment and therefore the oily water overflow is considered unlikely to be the cause of the defoliation of mangroves in Quibray Bay. The defoliation may instead be due the significant volume of freshwater inputs during 2022 and possibly persistent freshwater conditions (and ponding) that have since been documented within the affected mangrove area. Multiple lines of evidence were compiled to lead the team of specialists to this conclusion.

Ampol have been informed by the EPA that a team of internal specialist within the EPA are reviewing the Assessment report and they will provide feedback once the review has been completed.

Ampol are awaiting formal feedback from the EPA on the assessment report.

2.4.4 Event Reported to NSW Regulators

There were two (2) incidents pertaining to Terminal operations reported to NSW (EPA) in the 2024 period, as follows:

1. Loss of Containment of Gasoline from a Pipeline

On 22 March, an uncontrolled escape of gasoline occurred in the Main Pipe Way (MPW) at Ampol's Kurnell Terminal. Prior to the event, a project team had been performing work in preparation for pipeline pigging work scheduled to be completed across the coming months.

On the morning of the incident, a series of valve movements were put in place to prepare sections of the line for cleaning. Throughout the course of the day, temperatures increased, and the line began to build up pressure.

Around 1:47 pm, the thermal expansion of product in the line increased in pressure that resulted in the line failing and releasing of gasoline from the pipeline.

At the time of release there were no workers in the area, and none of the release product escaped from site. The pipeline section was repairs and returned to service.

2. Sheen from the POLAR BRIGHT on 5 December 2024

The POLAR BRIGHT discharged fuel from their Inert Gas (IG) System into Botany Bay. This discharge created a sheen that was initially observed by the Ampol Shore Officer around 06:15am. By 8:45am on the same day no sheen could be observed any longer. The ship's Captain and Chief Engineer agreed the source of the sheen was unburnt flue gas from diesel combustion that was being discharged from their IG System.

Note¹

D6 of SSD5544 require reporting to the DPE in cases where an incident has actual or potential significant off-site impacts on people, or the biophysical environment associated with the development.

2.5 2024 Terminal Data Trend Analysis

As stated in the above section, there were five (5) tanker ship exceedances against the Kurnell Terminal EPL 837 night-time noise limits identified and reported to the DPE and EPA in 2024. Four (4) community noise complaints were made, 3 when the ships were operating below the set noise limit. As stated previously, seventy six (76) tanker ships berthed at Kurnell in 2024 with a very small number of ship exceedances. This still represents a sustained improvement in terms of chartered tanker ships selection by Ampol Marine Assurance and surveillance of ships berthed at the Kurnell wharf by the Ampol Shore Officers since the SoundScience Noise Monitoring System was commissioned. Ships that exceed the night-time noise limit during two berthing events are removed from the Ampol Marine Assurance Chartering List and do not return to Kurnell.

Although odour complaints formed the majority of community feedback/complaints in 2024, there was a noticeable decrease in number of odour complaints (6) made by residents living in the vicinity of the Gate 5 and 100 series Tanks during 2024. This improvement is associated with the ongoing odour abatement works on site and a sustained engagement of the Kurnell community. The engineering works associated with the stormwater system on site and the stormwater discharge drain next to the wharf on-ramp has resulted in less community feedback/complaints associated with odour and stormwater quality – eleven (11) in 2022 and only one (1) in 2024.

The ongoing impact of the hydrocarbon contamination arising from the 2022 Flood incident is evident with reported Mangrove dieback in Quibray Bay. The investigation associated with the CUN issued on 16 August 2023 (by NSW EPA) has concluded in 2024, with the report issued to the NSW EPA.

The assessment did not identify evidence of residual hydrocarbons associated with the oily water overflow (April 2022) in the mangrove environment and therefore the oily water overflow is considered unlikely to be the cause of the defoliation of mangroves in Quibray Bay. The defoliation may instead be due the significant volume of freshwater inputs during 2022 and possibly persistent freshwater conditions (and ponding) that have since been documented within the affected mangrove area. Multiple lines of evidence were compiled to lead the team of specialists to this conclusion.

Ampol have been informed by the EPA that a team of internal specialist within the EPA are reviewing the Assessment report and they will provide feedback once the review has been completed Ampol is waiting for formal feedback from the EPA on the assessment report.

No other non-compliance events pertaining to Terminal operations were reported in the 2024 period.

Analysis of the available data show continued sound operation of the Terminal in line EPL 837 licence and SSD5544 consent requirements, other than continued odour complaints (but with declining numbers). Leaving aside the continued reporting of odour complaints and the current CUN, the EPL compliance and monitoring data does not reveal any trends that could potentially lead to non-compliance with any other licence and/or Terminal operations specific consent conditions.

2.6 Terminal Data Discrepancies (Predicted versus Actual Environmental Impacts)

The Terminal Environmental Management System (EMS) used to manage and monitor the potential environmental aspects and impacts associated with the development is considered to be mature and adequate to account for the various 'interested party' needs – as indicated by the comments made in the ISO auditor reports and environmental performance reporting in the NSW EPA Annual Return.

Despite the earlier restrictions imposed by COVID 19 in the 2020 - 2022 period, the engagement of a dedicated Community Liaison Manager has led to a sustained improvement in communications mechanisms, along with Kurnell community engagement efforts via letterbox drops (where needed) and monthly Community Newsletters, the Kurnell Community Facebook and other means – refer back to Section 2.4.2 of this report for details.

The environmental stewardship processes embedded under the Ampol OEMS Element 13: Environmental Management ensured that relevant monitoring data is generated, assessed and reported, in accordance with D9 of SSD5544 and EPL 837. This also allows for any potential gaps to be identified early with corrective and preventative action plans developed and implemented.

The following Table provided a summary of the comparative assessment of the actual operational environmental impacts against the predicted environmental impacts of the development, as described in the Conversion Project Environmental Impact Assessment (EIS) Main Report – Parts 1 and 2.

Table 2.4 Predicted Potential versus Actual Environmental Impacts Associated with the Development

Source: Caltex Kurnell Refinery Conversion Environmental Impact Assessment (EIS) Main Report - Parts 1 and 2 (URS)

Predicted /Potential Environmental Impacts	Aspects	Actual Impacts (2014-2024 period) Monitoring Programs Compliance/ Incidents/Other
Soil and Groundwater	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> • Disturbance of contaminated lands or groundwater • Spills/losses from construction equipment • Loss to ground and groundwater during tank cleanout/demolition <p>Operations:</p> <ul style="list-style-type: none"> • Disturbance of contaminated lands or groundwater • Oily water System overflow • Spills/losses from maintenance equipment/works • Pipeline (above/below) integrity/losses during tank to tank transfers • Tank - water draws 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: Nil GME non-compliances – refer to Table 7A-F for EPL Monitoring Points 15, 16, 28 & 29 NSW EPA CUN 30505381 (issued 16 August 2024): Quibray Bay Mangrove Dieback – WSP Ecological Assessment concluded and report issued to NSW EPA. Refer to page 55 for assessment details.</p>
Human Health & Ecological Risk	<p>All Development Stages:</p> <ul style="list-style-type: none"> • Flora and Fauna • Surface waters -Marton Park Wetlands shallow water bodies and swamy areas • Contaminants of Potential Concern impacting soils (TPH, BTEX, PAH, Phenols, Lead, Asbestos) • Groundwater impacts • Air quality (VOCs, dusts, H2S, NOx, CO2) 	<ul style="list-style-type: none"> • Ampol owned wetlands protected • Pipeway -asbestos impacted soils removed • Ongoing remediation works to assess/quantify/collect and remove COPC from site = reduced potential worker and community exposure • Improved air quality from refinery closure/cleanout/removal • Improved Terminal Tanks (Sleeve installation program) infrastructure <p>NSW EPA CUN 30505381: Quibray Bay Mangrove Dieback report issued to NSW EPA.</p>

<p>Surface Water and Wastewater</p>	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> • Disturbance of contaminated lands or groundwater • Spills/losses from construction equipment • Loss to ground and groundwater during tank cleanout/demolition <p>Operations:</p> <ul style="list-style-type: none"> • Disturbance of contaminated lands or groundwater • Oily water System overflow • Spills/losses from maintenance equipment/works • Pipeline (above/below) integrity/losses during tank to tank transfers • WWTP poor operational performance • Potential flooding from stormwater (National Park) ingress to site – overwhelm WWTP, etc. 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: 100% WWTP performance against EPL837 requirements – refer to Table 8 for <i>Monitoring Point 27</i></p> <p>Nil Monitoring non-compliances or incidents reported to EPA , DOH and DPE</p> <p>Refer to Section 2.4 for details of Ampol's continued remediation program.</p> <p>Refer to discussion on page 47 for CUN:30505381 details</p>
<p>Noise and Vibration</p> <p><i>(Potential impacts on community based sensitive receptors)</i></p>	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> • Compressor and generator use for pneumatic power equipment • Excavator related works • Truck movements off site during demolition works (scrape and other waste removal) • Traffic noise associated with on/off site movements (deliveries; cranes/other mobile equipment; worker cars) • Installation of new plant and tank refurbishments • Felling of large refinery structures <p>Operations:</p> <ul style="list-style-type: none"> • Berthed Tanker Ships (engine room equipment and discharge pumps) -principle source of community noise complaints and EPL night-time noise limits non-compliance • Process operations plant (product and slops pumps; Diesel Additive Injection System; dosing pumps; compressors, fire pump testing; etc.) • Maintenance tasks using power equipment • Reduced traffic noise associated with on/off site movements (deliveries; cranes/other mobile equipment; worker cars) 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: Nil non-compliance against construction noise limits Reduced number of ship related night-time noise limit exceedences over life of the project reporting period (to date) with significant improvement post commissioning of wharf based predictive noise monitoring system. Only 5 tanker ships exceeded the night-time noise limit with nil community complaints</p> <p>Reduced traffic movts into and through community following to completion of the conversion/demolition phases of the development.</p>

<p>Air Quality (AQ) and Odour</p>	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> • VOCs – tank draining and cleaning; painting • Storage Tank emissions during storage and transfers • Particulate/ (dust) generating works – cutting; grinding; excavation works; truck movements during dry weather; • Combustion emissions- portable equipment • disturbance of asbestos impacted soils • Odour generation – tank draining and cleaning; disturbance of hydrocarbon impacts soils; WWTP- fuel slops, separator pits <p>Operations (potential emission sources &/or odours):</p> <ul style="list-style-type: none"> • Storage Tanks – fugitive during storage and water draws • Product transfers – fugitive emissions during transfers • Oily Water system venting • Land Farm emissions during remediation/closure works (VOCs) • Combustion of ship fuels during shipping activities 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: AQ Monitoring Programs – nil non-compliances</p> <p>Significance improvement in air quality post the end of the demolition works – reduced number of truck movements on site (dust generation, etc) Land Farm closure and remediation works well advanced with significant reduction in potential odour generation from that area of the site. Other odour abatement and mitigation strategy initiatives have realised additional benefits to the Kurnell community. Refer to Section 3.1 for details.</p> <p>Installation of Tanks Sleeves well advanced – commitments to NSW EPA remain on track regards the last two tanks (installation 2025 and then 2026) Continued incidence of odour complaints but significant reduction (ave. 21/year) when compared to Refinery (ave. 70/year) since start of recordkeeping in 1998). Refer to Section 2.4.1 and 3.1 of this report for the Site’s <i>Odour Reduction and Mitigation Strategy</i> discussions.</p>
<p>Greenhouse Gases (GHG)</p>	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> • <u>GHG Scope 1</u> generated from combustion of fuels in construction equipment (compressors, cranes trucks, etc) • <u>GHG Scope 2</u> – deemed negligible, associated with office electricity use • <u>GHG Scope 3</u> – construction materials (steel, concrete) <p>Operations:</p> <ul style="list-style-type: none"> • <u>GHG Scope 1</u> generated from combustion of fuels in operational equipment (compressors, diesel pumps, trucks, excavators, etc.) • <u>GHG Scope 2</u> – deemed negligible, associated with office electricity use 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: Significantly reduced against refinery GHG profile</p>

<p>Transport and Access</p>	<p>Conversion and Demolition:</p> <ul style="list-style-type: none"> Increased construction vehicle movements - 10 vehicle movts per day Equipment and material deliveries- 10 vehicle movts per day Additional construction worker numbers (approx. 140) <p>Operations:</p> <ul style="list-style-type: none"> Reduced no. operations employees and support functions Reduced maintenance team Periodic increases of maintenance team during Tank T&I works (short time frames of 8-12 wks.) Reduced range of construction type vehicles and movts along Captain Cook Drive 	<p>Not Applicable – Conversion phase concluded 31 March 2020</p> <p>Operations: Sustained reduction in traffic numbers and movts. over the life of the project</p> <p>Ave 40 Ampol employees and regular maintenance workers per day</p> <p>Flexible working arrangements (days at home and in office) in place for non-shift personnel post COVID 19</p>
<p>Waste Management</p>	<p>Conversion and Demolition (waste streams):</p> <ul style="list-style-type: none"> Excavated soils – hydrocarbon contaminated; asbestos contaminated, non- contaminated Metals – surplus from installations, demolished infrastructure, piping; etc. Concrete – contaminated and non- contaminated Excavated road base/asphalt – contaminated and clean Dewatered groundwater - hydrocarbon contaminated; non-contaminated Used absorbents, oily rags and PPE General solid wastes – paper/cardboard and putrescible <p>Operations:</p> <ul style="list-style-type: none"> Excavated soils – hydrocarbon contaminated; asbestos contaminated, non- contaminated (remediation related) Fuel oils and slops Garnet grit (Tank surface cleaning) Used absorbents, oily rags and PPE Dewatered groundwater - hydrocarbon contaminated; non-contaminated General solid wastes – paper/cardboard and putrescible 	<p>Nil</p> <p>Operations: Nil non-compliances for waste storage, tracking and records (assessed via internal audit program and ISO audit sampling)</p> <p>Only approved waste transporters and facilities selected with <i>due diligence</i> assessments completed prior to selection</p> <p>Paper/cardboard and ink cartridge recycling program in place</p> <p>Reduction in waste streams and volumes of waste generated with cessation of refinery operations.</p>

PART 3 – 2024 TERMINAL ENVIRONMENTAL IMPROVEMENT PLAN OUTCOMES AND PLANS FOR 2025

This section of the report provides an overview of the environmental improvement works that have been carried out during the reporting period. This includes works carried out as part of the EPL's Pollution Reduction Program and ongoing remediation program works. An overview of the improvement works planned for 2025 will be provided as well.

3.1 CHANGES MADE TO ENHANCE THE ENVIRONMENTAL PERFORMANCE OF TERMINAL ACTIVITIES in 2024

3.1.1 Implementation of the Tank Sleeve Program – SC E17 (previously PRP U16.2)

In line with specific requirements of *Pollution Studies And Reduction Programs (PRPS)* defined in the EPL, Ampol has committed to the installation of emission reducing sleeves or seals on twelve External Floating Roof Tanks (EFRT) in Gasoline service after the transition from a Refinery to a Terminal. The NSW EPA have agreed to a three-part implementation program. Part 1 was completed and reported on in the 2015 Summary Report, Part 2 was also completed and reported on in the 2017 Summary Report, and Part 3 was reported on in the 2020 Summary Report.

The program has been converted to a Special Condition SC E17 with the title of Tank Turnaround and Inspection Program. The Special Condition requires annual reporting on progress of installing the emission reduction devices on the remaining three (3) Tanks, in line with agreed timeline. The first of these last three tanks (T408), had the emission reducing sleeves installed as part of the planned Turnaround and Inspection (T&I) earlier this year.

Only two (2) tanks remaining on the implementation program list:

- Tank 409 which is “out of service” in preparation for the T&I. The sleeves will be installed in mid-2025

Tank 513 will be removed from in service in 2025 with the sleeves installation in 2026. A progress report was issued to the NSW EPA on 31 October 2024.

3.1.2 Kurnell Terminal Odour Reduction and Mitigation Strategy

The odour mitigation plan was first developed in 2021. It was reviewed again after the 2022 flood with a number of additional odour abatement and mitigation initiatives decided, in consultation with the NSW EPA and the Kurnell community. In summary, it included the following measures:

- Continued use of industrial deodoriser in and around the northern Tank bunds to suppress potential odours
- Completion of regular odour surveys around our boundary to establish areas of potential concern. These surveys were conducted during southerly wind events and after rain

- While Tank water draws are a necessary operational task, the Operations team endeavoured, where possible, to undertake the task in optimum weather condition – dry with winds from the north
- As part of our Tank maintenance and repair program, we reviewed Tank bund floors to ensure rainwater was not trapped within the bunds thus minimising the potential for odours to be generated
- Applied the updated sewer system inspection program. This program ensures that the sewer systems around the Terminal are inspected at regular intervals and that silting up of the sewer drains and pits is minimised thus significantly reducing the potential to generate odours. The assessment and cleaning program was extended to all drains and sewer pits on site during 2022
- The Terminal Operations Manager and the National Environment Manager, Distribution have worked closely with odour specialist consultants and the NSW EPA representative to investigate the potential contributing site aspects and work on a mitigation plan to ensure offensive odours do not leave the site
- As stated previously, particular attention has been given to investigating and characterising the observed source of potential hydrocarbon odours and sheens at the stormwater outlet adjacent to the wharf. This has been followed up with sampling and investigations at the stormwater drain adjacent to the wharf and identified low concentrations of hydrocarbons at levels below relevant marine and health guidelines
- Following on from the flood event, we have been working alongside the EPA and a community working group to determine the best course of action, which as a first step, was the initiation of a detailed monitoring program. In addition, a detailed odour assessment has been conducted on site by an accredited consultant team, specialising in this area of environmental science.
- Continued communications and consultation with the affected community members, as well as the wider Kurnell community by providing updated on the efforts made.

The additional Pollution Studies and Reduction Program (PRP U27) and Special Conditions (SC E18 and SC E19) included in the Site's EPL837 (latest dated 9 Nov 2024), will complement the abatement and mitigation measures already taken and support a sustained reduction in perceived odour complaints. The Terminal Operation Manager and National Environment Manager, Distribution remains in regular contact with the NSW EPA to report on the progress of the odour mitigation measures in the EPL and to report any new odour complaints.

3.1.3 EPL 837 - SC E16 Kurnell Terminal Remediation Action Strategy

Whilst not within the scope of the SSD5544 Approval, in line with the NSW Contaminated Sites legislation and EPA expectations, a Kurnell Terminal Remediation Action Strategy (RAS) for the Site was prepared, ready for commencement at the end of the demolition works in 2020.

Certain remediation projects have required Sutherland Shire Council development consent to progress due to the Site's classification as an "Archaeological Site" under the Sutherland Shire Local Environment Plan 2015 and the stipulations of Clause 9 of State Environmental Planning Policy No. 55 – Remediation of Land.

In line with Ampol EMS requirements, a project specific Remediation Environment Management Plan (REMP) has also been developed. The key mitigation measures and controls described in the REMP are aligned to the requirements of the Terminal OEMP's Management Sub Plans.

The RAS is comprised of a number of smaller remediation projects. The REMP requirements for an individual remediation project will be driven by the scope of works, hence not all management measures identified in the REMP will be relevant to each individual remediation project.

The RAS identifies Areas of Environmental Concern (AECs) where remediation is warranted and provides a risk-based prioritisation and timeframe for remediation.

AECs are divided into three broad categories:

- Land contamination areas – areas of the Site where refinery operations have resulted in soil and/or groundwater contamination
- Asbestos impacted areas – areas where asbestos is the primary contaminant of concern
- Waste management areas – areas previously used for management of refinery waste

One such area is the now closed Refinery Land / Tank Farm area. Remediation of hydrocarbon sludges commenced during the latter period of demolition works and was completed in 2024. The landfarm material was removed through approved arrangements to transport hydrocarbon contaminated soils to approved waste facilities in Victoria and Queensland, in accordance with National Environment Protection (Movement of Controlled Waste between States and Territories) Measure 1998 (NEPM). It is expected that this area of the site will be successfully remediated by end 2024.

A number of Development Consent/Approvals (DA) have been issued by Sutherland Shire Council (SSC) and remain active for the following areas of the site:

- DA20/0104 – CLOR Landfarm
- DA21/0002 – Continental Carbon Pipe Line
- DA20/0779 – Pipeways
- DA23/0798 - Scrapyard

3.2 PLANNED IMPROVEMENT MEASURES FOR 2025

3.2.1 Continued Implementation of the Tank Sleeve Program – SC E17 (previously PRP U16.2)

In line the Tank T&I program, installation of the emission reducing sleeve on Tank 409 during the planned T&I (mid-year). Tank 513 will then be removed from “in service” in 2025, with the emission reducing sleeves installation in 2026.

3.2.2 Kurnell Terminal Odour Reduction and Mitigation Strategy

Given the number of perceived odour complaints in 2022 and continuing in 2024, we will continue our focus on the key elements of the Odour Reduction and Mitigation Plan - sewer system inspection program, as part of the site’s maintenance program, odour surveys, etc.

Additionally, the implementation of agreed actions arising from the 2023 odour and stormwater quality assessment of stormwater outlet adjacent to the wharf. Further assessment are planned for 2025 in association with the requirements set out in a number of Pollution Studies and Reduction Programs (PSRP) and Special Conditions (SC E19), such as:

- PRP U27: Stormwater Pipe Investigations and Rectifications
- SC E19: Waste Water Treatment Plant – Odour Abatement Program

Continuance of the activities set out in PRP U27 and SC E19, in line with NSW EPA requirements and the odour mitigation plan.

3.2.3 PRP U28: Stormwater Management System Upgrade

Continuance of the activities set out in PRP U28, in line with NSW EPA requirements, specifically:

By 30 April 2025 construct and install:

- a) A new stormwater retention pit at the low point of pipe way A, with an automated pumping system to divert stormwater from the retention pit to bund 602 for storage during periods of high rainfall; and
- b) A new stormwater retention pit at the low point of pipe way B, with an automated pumping system to divert stormwater from the retention pit to bund 623 for storage during periods of high rainfall.

3.2.4 SC E16 Kurnell Terminal Remediation Action Plan Strategy

Continuance of the RAS, in line with NSW EPA SC E16 reporting requirements, SSC DA requirements and the REMP.

3.2.5 CUN: 3505381- Quibray Bay Mangroves Ecological Assessment Works

Ampol is currently waiting for NSW EPA feedback on the ecological report issued by WSP. It is anticipated that additional assessments may be required.

3.2.6 SC E20: PFAS Risk Monitoring and Remediation Works

Firefighting foams containing bio-persistent per-fluorinated compounds (PFAS) have been both stored and used historically onsite, as part of the refinery's firefighting effort. To support the effective use of these foams, live firefighting training for both operational teams and the local Fire Brigade teams has been undertaken for many years. This has led to potential contamination of the soils and groundwater in a number of area on site, with the main area of contamination being the "Fire Training Area" (FTA).

In discussions with NSW EPA, Ampol implemented a PFAS sampling and analysis plan (SC E15) to assess potential PFAS contamination onsite and offsite, risk to offsite receptors and provide options for remediation where required (as part of SC E16). Ampol has provided a number of interim reports to the regulator.

NSW EPA has made further changes to the EPL by adding SC E20, titled "**PFAS Risk Monitoring and Remediation Works**". This SC requires Ampol to undertake an annual sampling program to identify and respond to (remedial) PFAS substances that have the potential to migrate off the premises.

The licensee must prepare and submit to the EPA an annual update by the end of March each year (first update commencing March 2026) on the following:

- all targeted PFAS remedial works, including at the CLOR, FTA and surrounding areas;
- future scopes for PFAS related remediation;
- PRB improvement works or alternatives for reducing offsite PFAS migration from surface water at the stormwater drain that runs towards the southern boundary of the site;
- phasing out of PFAS stored on site;
- disposal of PFAS and any PFAS contaminated material (Soils, IBCs etc.); and
- any other PFAS related work Ampol has undertaken throughout the year.

3.2.7 2025 SSD5544 Independent Environmental Audit (IEA)

Plan for and conduct the IEA that was deferred from 2024, with a report issued to the NSW DPIH.

3.2.8 Ongoing Wharf Cathodic Protection (CP) Program

Continuance of the activities set out in CP Project Plan.

4 SUMMARY

Over the previous year, the Terminal and its program of works, Tank T&Is, existing and new Pollution Studies and Reduction Programs and Special Conditions have complied with the environmental obligations set out in ELP 837 and SSD 5544.

The ongoing maintenance and environmental monitoring program (groundwater, leachate system, leak detection and erosion/sediment) associated with the ASC Containment Cell LTEMP is well established with inclusion of the monitoring requirements included in Ampol's periodic maintenance program.

The environmental management systems and activities developed from the EIS, SEE and the EPL (and incorporating the consent conditions requirements) have been effective implemented – as evidenced by the latest ISO14001:2015 Surveillance Visit 1 Audit outcomes. Attention to environment due diligence and the mature environmental management system in place will be continued as part of Terminal operations (land and wharf).

APPENDIX 1.

STATUS OF ACTIONS ARISING FROM THE 2021 INDEPENDENT ENVIRONMENTAL AUDIT (IEA) – covering SSD5544 Conversion of Refinery to Import and Distribution Terminal (including MOD 1 – 6 Demolition Works)

Non-Compliance	Auditor Recommendation (Options)	Ampol Response
<p>1. Site Emergency Response Plan (ERP)</p> <p>Ampol was unable to provide evidence that the updated ERP (referring to Tank demolition works) was submitted to the NSW DPE, as required by MOD3 - Tank 101 Demolition</p> <p>Applicable Consent Condition: C4B</p> <p><u>Mitigating Evidence</u></p> <p>Documents were presented to show that the Kurnell Emergency Response Plan (CD2037) was reviewed and updated in January 2018 and that Pre-Fire Tank Plans and ERP Scenario Guidance Note -Tank Fire exists. These documents confirms that Ampol had the capability to response to a tank fire, particularly one associated with an emptied/cleaned tank. IDS (Demolition specialist) also prepared a Demolition Plan for Tanks 101 that included mitigation measures to prevent fire occurrence during demolition works and emergency response.</p> <p>Specific to Tank 101, an AECOM letter sent to DPE (dated 03/10/2017) was produced to confirm that Tank 101 had been emptied, isolated from all energy sources, opened (access lids), cleaned and vented for several months in preparation for demolition. In addition, residual testing confirmed nil hydrocarbons present.</p>	<p>Sighted subsequent approvals and associated communications between Ampol and DPE</p> <p>Noted that other Reports and Plans sampled (including sub-plans) have been submitted and approved within required timeframes. Better diligence demonstrated across the consent condition requirements with key evidence retained in Project files under specific consent conditions. Cintellate used for action sign off.</p> <p>Continue adherence to sound records management for all Project documents and submissions to third parties, (plans, reports, etc.) by ensuring:</p> <ul style="list-style-type: none"> a) future Project leads and team members are inducted to the records management requirements for all Project documents, plans, reports and their submission to third parties, etc., as needed b) Action sign off/verification includes a check for correct record retention and evidence of submissions made (as required) 	<p>While Ampol accepted the audit team’s findings and comments and recommendations, significant work and oversight has gone into improving and sustaining adherence to sound records management for all Project documents and submissions to third parties, (plans, reports, etc.).</p> <p>There were a number of reporting commitments to DPE and EPA during the period 4th Qtr. 2017 to March 2020 (when the project concluded) and this single event should be considered as an “outlier”.</p> <p>Agreed we will use this NC as a “shared learning” opportunity to reinforce the important of sound records management practices for all project works and reporting commitments to third parties, such as regulators.</p> <p>2024 Update: The 2024 (3 yrly) C8 Hazard Audit was completed in late October with the report issued to NSW DPIH.</p>

STATUS OF ACTIONS ARISING FROM THE [2017 INDEPENDENT ENVIRONMENTAL AUDIT \(IEA\)](#)

SSD5544 Conversion of Refinery to Import and Distribution Terminal (including MOD 1 – Demolition Works)

Non-Compliance	Auditor Recommendation (Options)	Ampol Response
<p>1. Odour</p> <p>There were potentially offensive odours emitted from the operations at the Kurnell Terminal. This was shown in the Caltex complaints records which indicate that there were 17 odour issues (in this audit period) reported by neighbours to the Kurnell facility. Caltex reported this as a non-compliance in the annual EPA return 2016 -2017.</p> <p><i>Applicable Consent Condition D2 and EPL 837 Condition L7</i></p> <p>Not caused by the direct development activities but related to Condition D2 requiring the establishment and implementation of an Operational Environmental Management. Note: Caltex Loss Prevention procedures were followed.</p>	<p>Continue investigations in odour complaints and design odour monitoring programs to determine severity / causes.</p> <p>Most odour investigations are post event, so consider a more proactive approach to internally recording odours before they become potentially offensive to neighbours.</p>	<p>Ampol (previously Caltex) accepted the audit team’s findings and comments.</p> <p>We will continue investigations into any odour complaints received (internal and external).</p> <p>Potential odours sources are already known. Any operation and/or maintenance works in these areas take odour mitigation measures into consideration as a proactive step in preventing offensive odours in the surrounding neighbourhood.</p> <p>2024 Update:</p> <p>Odour remains an issue for the site. Please refer to Section 2.4, for 2024 odour complaints data and Sections 3.1 and 3.2 for project works relating to odour control and mitigation measures.</p>

Non-Compliance	Auditor Recommendation (Options)	Ampol Response
<p>2. Operational Controls – loss of containment</p> <p>Caltex loss prevention records and the annual EPA Return 2016 – 2017 recorded a non-compliance for release of slops (wharf), a spill of 86,000L of hydrocarbon water (land), loss of gasoline from pipeline “Gasoline 1” (land)</p> <p><i>Applicable Consent Condition D2 and EPL 837 Conditions L1 and O1</i></p> <p>Not caused by the direct demolition activities but related to Condition D2 requiring the establishment and implementation of an Operational Environmental Management. Note: Caltex Loss Prevention procedures were followed. Reported to DPE (Annual Review Report December 2016).</p>	<p>Loss Prevention investigations and subsequent actions were satisfactory.</p>	<p>Ampol (previously Caltex) accepted the audit team’s findings and comments.</p> <p>Gasoline 1 Pipeline:</p> <ul style="list-style-type: none"> • Checks were completed on all PSV valves to ensure they are operating as intended • All isolating valves for PSVs to be secured open • An internal memorandum (Loss Prevention System Alert) was issued to raise awareness of working around PSVs. <p><i>2024 Update:</i> Two (2) incident relating to pipeline or PSV’s in 2024 – refer to Section 2.4.4 for details</p>
<p>3. Late Submission of Demolition Studies (prior to commencement of Demolition)</p> <p>The following studies were required to be submitted (for approval) to the Secretary at least one month prior to the commencement of demolition works: Firewater System Review Demolition Safety Study Demolition had started prior to submission and approval.</p> <p><i>Applicable Consent Condition C3A</i></p>	<p>Sighted subsequent approval and associated communications between Caltex and DPE</p> <p>Noted that other Plans sampled (including sub-plans) have been submitted and approved within required timeframes. Better diligence demonstrated</p>	<p>Caltex accepted the audit team’s findings and comments.</p> <p>As stated by the Auditor, better diligence has been applied to the tracking of Consent Condition requirements, DPE submission dates and the use of the Caltex action tracking system to demonstrate compliance.</p> <p>The additional consent conditions arising from SSD5544 MOD2 and 3 were tracked in the Caltex action tracking system to demonstrate compliance.</p>

STATUS OF THE CALTEX ACTIONS ARISING FROM THE 2016 INDEPENDENT ENVIRONMENTAL AUDIT (IEA)

SSD 5544 Conversion of Refinery to Import and Distribution Terminal

Non-Compliance	Caltex Response (Summary)	Status	2017 IEA – Auditor Review of 2016 Actions
<p>1. Noise Management Plan</p> <p>Noise monitoring, indicating a high level of Leq > 60, at the boundary (Road 7) on 4th November 2014 was not further investigated / monitored to determine causes and resolution. It was not entered in the Caltex Loss Prevention System (or equivalent).</p> <p>Note: based on evidence sampled, this was an isolated example.</p> <p>Applicable Consent Conditions: C22</p>	<p>Ensure LPS (or equivalent) is used to capture high noise readings to facilitate (and have a record) of cause analysis and reporting to the</p>	<p>Communication of requirements to document all such events in LPS and Lessons Learnt session to Terminal and Demolition Project Team completed.</p> <p>Ensured effective recording and use of LPS for various issues e.g. odour, dust etc.</p>	<p>IEA Team Comments:</p> <p>Sighted communication of requirements and Lessons Learnt session.</p> <p>Sighted effective recording and use of LPS for various issues e.g. odour, dust etc.</p> <p>From environmental data sampled on this audit, no examples sighted where LPS was not used when applicable.</p>
<p>2. Air Quality Management Plan</p> <p>Air Quality Management Plan (Jan. 2014) requires that fortnightly reports (dust, odour observations / inspections) are submitted to the Caltex EMR by relevant contractors. There were no records available.</p> <p>Applicable Consent Condition: C28</p>	<p>Ensure specified monitoring activities (in Management Plans) are complied with. Include more information in the Management Plan as what the format of such reporting will be rather than a general reference.</p> <p>CEMP and sub-plan audits can be used to verify specified activities are being complied with and records are available to demonstrate it.</p>	<p>Lessons Learnt being carried forward into the demolition works phase.</p> <p>Consistent records now exist of regular audits and inspections conducted by contractor (IDES) and the Caltex Project Audit Schedule – all plans and sub-plans audited (each plan at least bi-monthly) as specified in each plan.</p>	<p>IEA Team Comments:</p> <p>Sighted evidence of Lessons Learnt being carried forward into the demolition phase.</p> <p>Sighted records of regular audits and inspections conducted by contractor (IDS) and the Caltex Project Audit Schedule – all plans and sub-plans audited (each plan at least bi-monthly) to ensure all inspections and monitoring is conducted as specified in each plan.</p>

<p>3. Construction Environment Management Plan (CEMP) Audits</p> <p>The CEMP (Jan. 2014) section 4.1 requires the following:</p> <ul style="list-style-type: none"> • Implementation of the CEMP will be audited by Caltex within 6 weeks of the commencement of site construction works • Contractor will submit copies of completed monthly HSE audits <p>The CEMP audit was not done; only one contractor monthly HSE audit was in evidence.</p> <p>Applicable Consent Condition: D1</p>	<p>Improve prominence of specified CEMP audits and use them as intended. Feature as a critical milestone to be tracked.</p> <p>Establish a better long-term record keeping system for information (e.g. HSE audits) from contractors.</p>	<p>Communication of requirements and Lessons Learnt session to Terminal and Demolition Project Team completed.</p> <p>DEMP audits. Project Audit Schedule covers all management plans (including sub-plans) on a regular basis. Internal audit status (Caltex and IDES) reviewed at weekly team meetings</p>	<p>IEA Team Comments:</p> <p>Sighted application of Lessons Learnt in the DEMP audits. Project Audit Schedule covers all management plans (including sub-plans) on a regular basis. Sighted audit reports and subsequent actions on findings.</p> <p>Contactor audit reports (IDES) were readily available.</p>
<p>4. Independent Environmental Audit</p> <p>This IEA was conducted past the approved extension date of October 2015.</p> <p>Applicable Consent Condition: D7</p>	<p>Clarify IEA timeframes with other / future Development Consents.</p>	<p>Proactively scheduled 2017 IEA to occur before the Demolition Project wind downs in late 2017 and the Project members start to leave Caltex. – 4th Qtr. 2017</p> <p>Engaged with DPE representatives to discuss scope of the next IEA early.</p>	<p>IEA Team Comments:</p> <p>IEAs for SSD 5544 and SSD 5353 back on track with required timeframes.</p>

APPENDIX 2.

ENVIRONMENTAL PERFORMANCE AGAINST ACTIVE SSD5544 CONSENT CONDITIONS (includes Demolition Works MODS 1, 2, 3, 4, 5 and 6)

1. SSD5544 Conversion and MOD1- Demolition Works

	CONDITIONS	Applicable Phase: Conversion (C) Demolition (D) Terminal Ops (T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive Statement	Compliance Status: Compliant Non-Compliant Not Triggered	Comments/Actions (where required) <i>Note:</i> <i>Some 2021 IEA comments left in for context</i>
	SCHEDULE B ADMINISTRATIVE CIONDITIONS				
	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
B1	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.	G	Active/ongoing	Compliant	2021 IEA Auditor noted NIL breaches
	TERMS OF CONSENT				
B2	The Applicant shall carry out the Development generally in accordance with the: (a) EIS; (b) RTS; (c) site layout plans and drawings in the EIS (see Appendix A); (d) MODS 1; 2; 3; 4; 5 and 6 and (e) conditions of this consent	G	Active/ongoing	Compliant	2021 IEA One (1) consent condition non-compliant against C4B - Site Emergency Response Plan (ERP) Refer to Appendix 1 findings
B3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However,	G	Statement	Compliant	Not triggered

	the conditions of this Consent shall prevail to the extent of any inconsistency.				
B4	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 (b) the implementation of any actions or measures contained within these reports, plans or correspondence.	G	Active/ongoing	Compliant	2021 IEA Auditor noted NIL breaches
B5	Subject to confidentiality, the Applicant shall make all documents required under this consent available for public inspection on request.	G	Statement	Compliant	2021 IEA Auditor noted Ampol Public webpage up to date
LIMITS OF CONSENT					
B6	The Applicant shall not store in excess of 925 mega litres (ML) of refined product on the Site at any one time, unless otherwise agreed to in writing by the Secretary.	G	Active/ongoing	Compliant	2024 ISO Surveillance V1 Audit : Auditor noted NIL breaches against max Volume limits
B7	The construction works associated with the Development shall not extend beyond five (5) years from the date of approval.	G	This phase has been completed	Compliant	
B7A	The demolition works associated with the development shall not extend beyond three (3) years from the date of consent of MOD 1.	D	This phase has been completed	Compliant	Refer to comment against B7

LAPSING OF CONSENT					
B8	This consent shall lapse on 1 December 2018 unless any part of the Project is physically commenced (within the meaning of section 95 of the EP&A Act) on or before that day, in accordance with any consent or development consent, on the Land to which the consent or consent relates.	G	This phase has been completed	Compliant	Refer to comment against B7
SURRENDER OF EXISTING DEVELOPMENT CONSENTS					
B9	Within six (6) months of ceasing refining operations, or as otherwise agreed in writing by the Secretary, the Applicant shall surrender all existing development consents for the site listed in Appendix B in accordance with Clause 97 of the EP&A Regulation.	C	This phase has been completed	Previously assessed in 2016 and 2017 IEA as Compliant	Not triggered Nil additional DA/s to surrender
B10	Within six (6) months of the issue of a Compliance Certificate or Occupation Certificate for the following development consents, or as otherwise agreed in writing by the Secretary, the Applicant shall surrender these consents in accordance with Clause 97 of the EP&A Regulation. (a) DA 13/0195 – Stormwater Drainage Upgrade; and (b) DA 12/0238 – Construction of a switch room.	C	This phase has been completed	Compliant	The relevant regulatory approval requirement has previously been met and assessed as compliant
B11	Nothing in this consent alters or modifies the following development consents: (a) SSD 5353 – Port and Berthing Works; (b) DA 13/0335 – Construction and operation of a Bio-Pile Pilot Trial to treat Hydrocarbon impacted soils; (c) DA 09/840 – Jet Fuel Remediation; and (d) DA 11/1090 – Remediation of Limestone Pits.	G	Statement	Statement	
STATUTORY REQUIREMENTS					
B12	The Applicant shall ensure that all licences, permits and approval/consents are obtained as required by law and maintained as required throughout the life of the Development. No condition of this consent removes the obligation for the Applicant to obtain, renew or comply with such licences, permits or approval/consents.	G	Active/ongoing	Compliant	2024 Comment Ongoing compliance verified during 2024 ISO Surveillance V1 Audit

AMENDED ENVIRONMENT PROTECTION LICENCE (EPL) REQUIREMENT					
B13	Prior to the commencement of construction, the Applicant must apply to the EPA to vary the Environment Protection Licence (EPL) for the Kurnell Refinery (Licence No. 837) to permit the Development.	C	This phase has been completed	Compliant	
B13 A	The Applicant shall apply to the EPA to vary the EPL if additional scheduled activities are required to be undertaken as result of the demolition works.	G	Active/Ongoing	Compliant	2024 Update: Not triggered- nil demolition works
STRUCTURAL ADEQUACY					
B14	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.	C	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA's as compliant	2024 Update: Not triggered Nil new buildings or structure
B15	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version.	D	This phase has been completed	Compliant Assessed in 2017 IEA	NOTE: All demolition works (structures) completed mid 2019
OPERATION OF PLANT AND EQUIPMENT					
B16	The Applicant shall ensure that all plant and equipment used for the Development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	G	Active/ongoing	Compliant	2024 Comment Ongoing compliance to PM program assessed and verified during 2024 ISO Surveillance V1 Audit
B16 A	The cooling water outlet pipeline shall be removed from beneath Silver Beach north of Prince Charles Parade and up to 20 metres seaward from the low tide mark in Botany Bay as shown in Appendix A of this consent.	D	This phase has been completed	Compliant	As per Dec 2020 Update: Refer to MOD5 comments

PROTECTION OF PUBLIC INFRASTRUCTURE					
B17	<p>Prior to the commencement of construction, the Applicant shall:</p> <p>(a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(b) submit a copy of this report to the Secretary and Council.</p>	C	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA's	2021 IEA Auditor noted NIL breaches
B17 A	<p>Prior to the commencement of <u>demolition</u> works, the Applicant shall:</p> <p>(a) prepare a dilapidation report of the public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(b) submit a copy of this report to the Secretary and Council.</p>	D/T	This phase has been completed	Compliant Assessed in 2017 IEA	2021 IEA Auditor noted NIL breaches
B18	<p>The Applicant shall:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</p>	G	Active/ongoing	Compliant	Not triggered during the life of the Development
STAGED SUBMISSION OF PLANS OR PROGRAMS					
B19	<p>With the approval of the Secretary, the Applicant may:</p> <p>(a) submit any strategy, plan or program required by this consent on a progressive basis; and/or</p> <p>(b) combine any strategy, plan or program required by this consent.</p> <p>Notes: If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages and the trigger for updating the strategy, plan or program. There must be a clear relationship between the strategy, plan or program that are to be combined."</p>	G	Active/ongoing	Compliant Assessed in 2016 and 2017 IEA's	<p>Submission of Stage 2 Terminal OEMP & Management Plans (including draft ASC C/Cell LTEMP) submitted Feb 2020. Feedback received from DPE- minor changes to OEMP but require final (approved) ASC C/Cell LTEMP) submitted.</p> <p>Communications with DPE (P. Copas) re availability of LTEMP due to delays by Site Auditor.</p>

					<p>DPE approved extension of submission date to mid-March 2021</p> <p>2021 IEA Auditor Comments: Latest submission of amended Ampol Kurnell Terminal OEMP Final Stage 2 on 7 March sighted.</p> <p>Shown evidence (dated 8 April) confirming DPE approval of the OEMP and Management Plans – including ACS C/Cell LTEMP</p>
DISPUTE RESOLUTION					
B20	In the event that a dispute arises between the Applicant and Council or a public authority other than the Department, in relation to a specification or requirement applicable under this consent, the matter must be referred by either party to the Secretary, or if not resolved, to the Minister, whose determination of the dispute shall be final and binding to all parties. For the purpose of this condition, ‘public authority’ has the same meaning as provided under Section 4 of the Act.	G	Statement	Not triggered	<p>2024 Comment</p> <p>Nil instances during the Development period to date</p>
B21	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	G	Statement	Compliant	<p>2024 Comment</p> <p>Ongoing compliance verified during 2024 ISO Surveillance V1 Audit</p>
B22	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, sub-contractors and visitors.	G	Active/ongoing	Compliant	<p>2024 Comment</p> <p>Ongoing compliance verified during 2024 ISO Surveillance V1 Audit</p>

SCHEDULE C ENVIRONMENTAL PERFORMANCE AND MANAGEMENT					
HAZARDS AND RISKS					
Terms of Approval					
C1	The Applicant shall: (a) carry out the Development in accordance with the PHA; (b) implement all control measures proposed in the PHA; (c) implement all actions proposed by Caltex in response to the recommendations from the Buncefield incident investigation report (Kurnell Buncefield Review - Final, submitted to the Department May 2013). (d) implement all proposed actions listed in Caltex's response to the Department's requests for additional information and clarifications (Caltex Response to D&I Queries of Caltex Submitted QRA – August 2013).	G	This phase has been completed	Compliant	2021 IEA Auditor noted NIL breaches Ongoing compliance to PHA program assessed and verified during 2024 ISO Surveillance V1 Audit
C1A	The Applicant shall implement the recommendations in section 6 of the document titled <i>Hazard and Risk Analysis</i> of the proposed <i>Caltex Kurnell Refinery Demolition Works</i> (HRA), prepared by Planager Pty Ltd and enclosed in Appendix B of the SEE.	G	Completed	Compliant	2021 IEA Auditor noted NIL breaches
Demolition					
C1B	The Applicant shall ensure that relevant demolition work associated with the development is carried out in accordance with Australian Standard AS 2601:2001: The Demolition of Structures, or its latest version and the requirements of the <i>Work Health and safety Regulation 2011</i> .	D	This phase has been completed	Compliant	Note comments in "Applicable Phase" column The relevant regulatory approval requirement has previously been met and assessed as compliant
C1C	The Applicant shall ensure that major demolition works as defined under the <i>Work Health and safety Regulation 2011</i> are undertaken by licensed demolition experts.	D	This phase has been completed	Compliant	2024 Update: Not triggered

Commissioning																				
C2	<p>The Applicant shall commission the development in accordance with Table 1 below:</p> <table border="1"> <thead> <tr> <th>System Description</th> <th>Estimated Commencement of Commissioning</th> <th>Estimated Commencement of Operation of System</th> </tr> </thead> <tbody> <tr> <td>Jet</td> <td>1 March 2014</td> <td>1 June 2014</td> </tr> <tr> <td>Diesel</td> <td>1 April 2014</td> <td>1 July 2014</td> </tr> <tr> <td>Gasoline</td> <td>1 May 2014</td> <td>1 August 2014</td> </tr> <tr> <td>Slop</td> <td>1 May 2014</td> <td>1 August 2014</td> </tr> </tbody> </table>	System Description	Estimated Commencement of Commissioning	Estimated Commencement of Operation of System	Jet	1 March 2014	1 June 2014	Diesel	1 April 2014	1 July 2014	Gasoline	1 May 2014	1 August 2014	Slop	1 May 2014	1 August 2014	C	This phase has been completed	Compliant	<p>Note comments under “Activity Status” Phase</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p>
System Description	Estimated Commencement of Commissioning	Estimated Commencement of Operation of System																		
Jet	1 March 2014	1 June 2014																		
Diesel	1 April 2014	1 July 2014																		
Gasoline	1 May 2014	1 August 2014																		
Slop	1 May 2014	1 August 2014																		
Pre-construction																				
C3	<p>At least one month prior to the commencement of construction of the proposed 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, in consultation with WorkCover NSW, 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 for 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.</p> <p>(a) <u>Construction Safety Study</u></p> <p>A Construction Safety Study, consistent with the Department of Planning’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.</p> <p>(b) <u>Fire Safety Study</u></p> <p>A Fire Safety Study for the proposed Development. This study shall cover the relevant aspects of the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 2, ‘Fire Safety Study Guidelines’ and the New</p>	C	This phase has been completed	<p>Compliant</p> <p>Assessed in 2016 and 2017 IEA’s</p>	<p>Not triggered</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p>															

	<p>South Wales Government’s ‘Best Practice Guidelines for Contaminated Water Retention and Treatment Systems’. The study shall also be submitted for approval to Fire and Rescue NSW.</p> <p>(c) <u>Hazard and Operability Study</u></p> <p>A Hazard and Operability Study for the proposed Development, chaired by an independent qualified person. The study shall be consistent with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 8, ‘HAZOP Guidelines’.</p> <p>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.</p> <p>(d) <u>Final Hazard Analysis</u></p> <p>A Final Hazard Analysis of the proposed Development, consistent with the Department of Planning’s Hazardous Industry Planning Advisory Paper No. 6, ‘Hazard Analysis’.. The FHA shall re-evaluate and confirm all relevant data and assumptions from the Preliminary Hazard Analysis.</p>				<p>As per Dec 2019 Update:</p> <p>Completed and submitted 4th Qtr. 2019. Subsequent approval by Regulator</p>
Pre-Demolition					
C3A	<p>At least one month prior to the commencement of demolition works (except for 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 (b). Demolition, other than of preliminary works, shall not commence until approval has been given by the Secretary.</p> <p>(a) <u>FIRE WATER SYSTEM REVIEW</u></p> <p>A review of the Firewater System to detail which parts of the system will be removed and/or retained. This review shall include a list of measures that will be implemented to ensure that the firefighting capabilities of the Caltex Terminal will not be compromised during or as a result of the demolition works.</p>	D	This phase has been completed	<p>Non-compliant – 2016 IEA</p> <p>(Administrative NC)</p> <p>Refer to 2016 IEA Report and comments in Appendix 1, Part 2(a)</p> <p>Note: demolition had already started prior to submission and</p>	<p>2021 Comments:</p> <p>Subsequent submissions of management plans to DPE have all been within timeframes</p>

	<p>(b) <u>DEMOLITION SAFETY STUDY</u></p> <p>The study shall report on the status of implementation of the recommendation outlined in the HRA for the demolition works, enclosed as Appendix B of the SEE. The study shall include examples of the hazards control plans developed for high risk activities and task based risk assessments of the process safety related hazards.</p>			approval, thus non-compliant with the timeframe required; all plans subsequently approved	
	Pre-commissioning				
C4	<p>The Applicant shall develop, in consultation with WorkCover NSW, 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 proposed 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.</p> <p>(a) <u>Emergency Plan</u></p> <p>A comprehensive Emergency Plan and detailed emergency procedures for the proposed 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 of Planning's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.</p> <p>(b) <u>Safety Management System</u></p> <p>A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records 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</p>	G	This phase has been completed	Compliant	Not triggered
		G	This phase has been completed	Compliant	<p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p> <p>Not triggered</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p> <p>2024 Update:</p> <p>SafeWork NSW current assessing Site's MHF documentation, as per Regulator's schedule</p>

	<p>Department of Planning'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 safety critical equipment is, at a minimum, consistent with the data estimated in the PHA.</p>				
C4A	<p>No later than one month prior to the commencement of the demolition works, or within such a further period as the Secretary may agree, the Applicant shall submit for the approval of the Secretary an updated Emergency Plan and detailed emergency procedures. The plan shall be in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No.1 'Industry Emergency Planning Guidelines' and shall provide information of the emergency arrangements during the demolition works.</p>	D	This phase has been completed	Compliant Assessed in 2017 IEA	Not triggered The relevant regulatory approval requirement has previously been met and assessed as compliant
C5	<p>Prior to the Commencement of commissioning the first asset within each system (see Condition C2), the Applicant shall submit a Pre-Commissioning Plan and Pre-Start-up Safety Review Checklists to the Secretary.</p>	C	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA's	Not triggered The relevant regulatory approval requirement has previously been met and assessed as compliant
	Pre-Start-up				
C6	<p>Pre-Start-up Compliance Report</p> <p>One month prior to the commencement of operation of the first asset in each of the four systems (see Condition C2), the Applicant shall submit to the Secretary, a report detailing compliance with Conditions C3, C4 and C5 of this consent. The report shall be prepared in consultation with WorkCover NSW, and shall include:</p>	T	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA's	Not triggered The relevant regulatory approval requirement has previously been met and assessed as compliant

	<p>(a) dates of study/plan/system submission, approval, commencement of construction and commissioning;</p> <p>(b) actions taken or proposed, to implement the recommendations and safety-related control measures in the studies/plans/systems; and</p> <p>(c) responses to each requirement imposed by the Secretary under Condition C7 of this consent.</p> <p>Note: Compliance with Condition C4 may not be achievable until after such time as the documentation describing the plans and systems required under that condition have been developed. A subsequent report may therefore be required to be prepared and submitted after the documentation required by Condition C4 has been developed.</p>				
Post-Start-up					
C7	<p><u>Post-Start-up Compliance Report</u></p> <p>Three months after the refinery process units shut down, the Applicant shall submit to the Secretary, a report that has been prepared in consultation with WorkCover NSW verifying that:</p> <p>(a) the Emergency Plan required under Condition C4(a) is effectively in place and that at least one emergency exercise has been conducted; and</p> <p>(b) the Safety Management System required under Condition C4 (b) has been fully implemented and that records required by the system are being kept.</p> <p>The report shall be prepared in consultation with WorkCover NSW.</p>	T	This phase has been completed	Compliant	Not triggered
C7A	<p><u>Fire Safety Study Review</u></p> <p>One month prior to the completion of demolition works, or within such further period as the Secretary may agree, the Applicant shall submit for the approval of the Secretary, a revised Fire Safety Study for the Caltex Terminal. This study shall cover the relevant aspects of the Department's <i>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.</i> The study shall also be submitted to NSW Fire and Rescue for approval.</p>	D	This phase has been completed	Fire Safety Study Review submitted to DPE and NSW Fire and Rescue Oct 2019	Not triggered

C8	<p>Hazard Audit Twelve months after all four systems being fully operational and every <u>three</u> years thereafter, or at such intervals as the Secretary may agree, the Applicant shall carry out a comprehensive Hazard Audit of the proposed Development and within one month of each audit submit a report to the Secretary.</p> <p>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 of Planning’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:</p> <p>(a) verify implementation of all actions proposed by Caltex in response to the recommendations from the Buncefield incident investigation report (Kurnell Buncefield Review - Final, submitted to the Department May 2013). (b) verify implementation of all actions listed in Caltex’s response to the Department’s requests for additional information and clarifications (Caltex Response to DP&I Queries of Caltex Submitted QRA – August 2013) (c) confirm that the throughput and storage quantities of potentially hazardous materials are consistent with the PHA. (d) verify that an inspection, testing and preventative maintenance program has been developed, implemented and maintained to ensure the reliability and availability of the key safety critical equipment. (e) verify implementation of any measures arising from the reports submitted in respect of Conditions C2 to C5 of this consent.</p> <p>The audit report must 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.</p>	T	This phase has been completed	<p>Compliant</p> <p><u>1st</u> Hazard Audit (October 2015)</p> <p>Audit report and proposed actions submitted to DPE and DPE Response (Jan. 2016).</p> <p><u>2nd</u> Hazard Audit (October 2018)</p> <p>Audit report and proposed actions submitted to DPE on 15 Oct 2018</p> <p>Actions tracked in MEET-002465</p> <p>DPE Response Letter (15 Nov 2018)</p> <p>3rd Hazard Audit (October 2021)</p> <p>Agreed 2023 (3rd) Hazard Audit actions in Cintellate - MEET-007172</p>	<p>2021 IEA confirmed all MEET-002465 actions completed</p> <p>Auditor noted NIL breaches</p> <p>2024 Update</p> <p>4th Hazard Audit conducted by Arriscar in October 2024.</p> <p>Report sent to DPE in December 2024</p> <p>Audit schedule, Report and agreed 2024 Hazard Audit actions in Cintellate - MEET-015126</p>
----	--	---	-------------------------------	--	---

C9	<p>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 C2 to C8 of this consent inclusive, within such time as the Secretary may agree.</p>	G	Statement	Compliant	<p>2024 Update</p> <p>All 2021 Audit report actions have been verified @ the 2024 (4th) Hazard Audit.</p> <p>Note: 2024 audit actions have been assigned</p>
Fire Risk Management During Demolition					
C9A	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) ensure the emergency procedures detailed in condition 9A, address and mitigate, as far as reasonably practical, the consequences of potential fire and hazmat incidents during demolition works and the potential health risks to firefighters undertaking emergency operations in relation to foreseeable fire/hazmat scenarios; b) ensure two copies of the emergency procedures detailed in condition a) above are located in demolition areas; c) ensure appropriate first aid firefighting equipment is provided on site; d) ensure that plant operators and demolition contractors are trained to undertake first aid firefighting in the event of an incident; and e) ensure that comprehensive and specific risk control measures are developed and implemented for Scenario 5 detailed in Table 3, Section 4 of the HAZDEM. The control measures developed must incorporate comprehensive training of demolition contractors in regard to the requirements for the control of ignition sources at the site. 	D	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA's	The Conversion to Terminal project concluded on <u>31 March 2020</u> .
SOIL AND WATER					
Discharge of Water					
C10	The Development shall comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters, except as expressly provided in an EPL.	G	Active/ongoing	Non-Compliant	<p>2024 Comment:</p> <p>CUN 3505381 issued 16 Aug 23 for Quibray Bay</p>

					<p>Mangroves – requires ecological monitoring and assessment work to be carried out (completed in early 2024)</p> <p>Refer to Section 2.4 for more details on assessment findings.</p>
Erosion and Sediment Control					
C11	<p>During the construction and demolition works associated with the Development, the Applicant shall implement 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 relevant Management and Mitigation measures contained within Appendix C of this consent.</p>	T & D	Statement	Compliant	<p>The Conversion to Terminal project concluded on <u>31 March 2020</u>.</p>
Imported Soil					
C11 A	<p>The Applicant shall:</p> <ul style="list-style-type: none"> a) ensure that only VENM or any other material approved in writing by the EPA issued as fill in the Eastern ROW and Western ROW; b) ensure that the material used as backfill for Solver Beach is of similar grain size and colour characteristics; c) be permitted to use only VENM or any other material that meets all of the conditions of a Resource Recovery Order issued by the EPA under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> for use in the Caltex Terminal. d) ensure that any VENM or other materials used by the Applicant are fit for purpose and are only used as specified by the relevant Resource Recovery Exemption issued by the EPA. e) keep accurate records of the volume and type of fill to be used; and f) make these records available to the Department upon request. 	G	Active/ongoing for Terminal operations	<p>Compliant</p> <p>Assessed during 2017 IEA</p>	<p>2024 ISO Audit:</p> <p>Auditor noted NIL breaches against waste log entries and disposal documents sampled</p> <p>2024 ISO:EMS Surveillance V1 Audit</p> <p>Auditor checked Kurnell Environmental Waste Log record – refer to report noting NIL breaches</p>

C11 B	During demolition works, the Applicant shall implement erosion and sediment control measures for managing temporary stockpiles, in accordance with the relevant requirements in the latest version of the <i>Managing Urban Stormwater: Soils and Construction – Volume 1</i> and the relevant Management and Mitigation measures contained within Appendix C of this consent.	D	Statement	Compliant	The Conversion to Terminal project concluded on <u>31 March 2020</u> .
Water Management Plan					
C12	<p>The Applicant shall prepare and implement a Water Management Plan for the Development to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing); (c) In addition to the standard requirements for management plans (see Condition D3), this plan must include a Surface Water Management Plan, that: <ul style="list-style-type: none"> · includes a description of the water management system on site, including the: <ul style="list-style-type: none"> • stormwater system; and, • oily water / wastewater system. • includes plans for the above two components of the systems: • Demonstrates compliance with any requirements of the EPL and/or the EPA. 	T & D	<p>Plan Completed & Approved</p> <p>Active/ongoing</p>	Compliant	<p>2024</p> <p>Ongoing compliance verified during 2024 ISO Surveillance V1 Audit</p> <p>Final Stage Two Kurnell OEMP reviewed and approved by DPE. Redacted version published on Ampol Public website</p> <p>Auditor shown evidence (dated 8 April 2021) confirming DPE approval of the OEMP and all Management Plans – including ACS C/Cell LTEMP</p>
C12 A	<p>The Applicant shall update and implement the Soil and Water Management Plan for demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C12 and shall also:</p> <ul style="list-style-type: none"> (a) be submitted to the Secretary for approval (See condition D1A for timing); (b) include a description of soil and water issues associated with the demolition works; (c) include measures for managing soils that are excavated and stockpiled on site including erosion and sediment control measures for stockpiles and disturbed areas; (d) include details of water management and monitoring requirements during demolition works; and 	D	<p>Plan Completed & Approved</p> <p>Active/ongoing</p>	Compliant	

	(e) include procedures for corrective action in the event that potential contaminants of concern are identified in the groundwater from the quarterly groundwater monitoring program.				
Groundwater					
C13	In the event that groundwater is intersected during <u>construction and demolition</u> works the Applicant shall: (a) obtain the necessary water related approvals from NOW; (b) develop a Groundwater Management Plan for the testing, dewatering, storage, movement and treatment of any groundwater in consultation with the NOW, to the satisfaction of the Secretary.	C, D	This phase has been completed	Compliant	Nil such incidents reported
Acid Sulphate Soils (ASS) Management Plan					
C14	If Acid Sulfate Soils (ASS) are encountered during construction and demolition works, the Applicant shall take steps to prevent further oxidation of exposed ASS and will cease all work until an ASS Management Plan is prepared for the Development to the satisfaction of the Secretary. This Plan must: (a) be prepared in consultation with the EPA and Council by a suitably qualified and experienced expert; (b) be approved by the Secretary prior to the continuation of any excavation works; (c) outline the investigations that have be undertaken to test for the presence of ASS in accordance the NSW State Government's Acid Sulphate Soils Manual (ASSMAC 1998); (d) detail the protocols to be put in place and followed; (e) detail how the ASS will be tested, handled and stockpiled; (f) detail measures to prevent erosion and sedimentation of ASS; and, if necessary (g) outline how the ASS will be disposed of off-site (e.g. at a licensed facility).	C, D	This phase has been completed	Not triggered.	2024 Update: Nil events involving ASS found during the life of the Development Terminal Soil and Water Management Sub Plan includes section dealing with ASS. DPE approved OEMP and all Sub-Plans.

	Contamination Management				
C15	<p>The Applicant shall prepare and implement a Contamination Management Plan for the Development prior to commencement of <u>construction</u>. The Plan shall:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the EPA and NSW Health; (b) be to the satisfaction of the Secretary (refer to Condition D1 for timing); (c) outline measures for managing potentially contaminated soil and groundwater, including soil testing, classification, handling, storing and disposal; (d) detail the measures that will be employed to prevent erosion and sedimentation of contaminated soil; (e) detail measures for periodically testing surface water run-off that may accumulate during excavation works for elevated levels of contamination, with any water that is found to have elevated levels of contaminants being disposed of via the on-site Wastewater Treatment Plant. (f) detail measures for managing asbestos encountered during works, including disturbances of soil and release of asbestos into the air; (g) outline how contaminated soil and water would be classified and disposed of in accordance with the <i>Protection of the Environment Operations Act 1997</i> and associated regulations and characterised in accordance with the <i>EPA's Waste Classification Guidelines</i>. g) Detail how the storage ,disposal and transport of asbestos waste would be undertaken in with the Protection of the Environment Operations (Waste) regulations ; and h) assess any likely impact on existing remediation projects and, if any impacts are identified, provide details as to the measure that shall be taken to reduce or avoid that impact. 	C, D	<p>Plan Completed & Approved</p> <p>This phase has been completed</p>	Compliant	<p>2024 Update:</p> <p>Remediation of affected areas of site included in under Kurnell Remediation Strategy. Works commenced in 2019 and will continue for a number of years.</p> <p>Covered by SSC DA processes</p> <p>2024 Update:</p> <p>Refer to body of this report for 2024 Remediation Action Plan activities.</p>
C15 A	<p>The Applicant shall update and implement the Contamination Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C15 and shall also:</p> <ul style="list-style-type: none"> a) be submitted to the Secretary for approval (See condition D1A for timing); 	D	This phase has been completed	<p>Compliant</p> <p>Assessed in 2017 IEA</p>	<p>Refer to comments in C15</p> <p>The Conversion to Terminal project concluded on <u>31 March 2020</u>.</p>

	<ul style="list-style-type: none"> b) detail measures for the identification and monitoring of potentially contaminated soils and groundwater including the use of excavation visual and olfactory indicators; and c) include measures for managing potentially contaminated soils and groundwater during ground disturbance and excavation works. 													
Asbestos Management														
C15 B	<p>The Applicant shall ensure that any asbestos encountered during the demolition works is monitored, handled, transported and disposed of by appropriately qualified and licensed contractors in accordance with requirements of Workcover and relevant guidelines, including:</p> <ul style="list-style-type: none"> a) <i>Work Health and Safety Regulation 2011;</i> b) <i>Model Code of Practice – How to Manage and Control Asbestos in the Workplace, 2011 Safe Work Australia</i> c) <i>Model Code of Practice – How to Safely Remove Asbestos, 2011 Safe Work Australia; and</i> d) <i>Protection of the Environment (Waste) Regulation 2005.</i> 	D	This phase has been completed	Compliant	<p>Not triggered</p> <p>2024 Update:</p> <p>Refer to Section 2.3.1 for ACM monitoring results</p> <p>Auditor noted NIL breaches of air monitoring & and ACM/ACS waste management during the 2024 ISO:EMS Surveillance V1.</p>									
NOISE AND VIBRATION														
Construction Noise Limits														
C16	<p>The Applicant shall ensure that the construction noise generated by the development does not exceed the criteria in Table 2 below.</p> <p><i>Table 2: Construction Noise Criteria (dB(A))</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Location</th> <th style="text-align: center;">Day LA_{eq} (15min)</th> <th style="text-align: center;">Evening LA_{eq} (15 min)</th> </tr> </thead> <tbody> <tr> <td>R2-30D Cook Street</td> <td style="text-align: center;">46</td> <td style="text-align: center;">40</td> </tr> <tr> <td>At any other residence or other noise sensitive receiver</td> <td style="text-align: center;">50</td> <td style="text-align: center;">45</td> </tr> </tbody> </table>	Location	Day LA _{eq} (15min)	Evening LA _{eq} (15 min)	R2-30D Cook Street	46	40	At any other residence or other noise sensitive receiver	50	45	C, D	This phase has been completed	Compliant Reviewed in 2016 and 2017 IEA	Not triggered
Location	Day LA _{eq} (15min)	Evening LA _{eq} (15 min)												
R2-30D Cook Street	46	40												
At any other residence or other noise sensitive receiver	50	45												
Operational Noise Limits														

C17	<p>The Applicant shall ensure that the operational noise generated by the Development does not exceed the Criteria for residential receivers are summarised in Table 3 below:</p> <p>Table 3: Operational Noise Limits dB(A)</p> <table border="1" data-bbox="168 328 696 541"> <thead> <tr> <th>Location</th> <th>Day L_{Aeq} (15min)</th> <th>Evening L_{Aeq} (15min)</th> <th>Night L_{Aeq} (15min)</th> <th>Night L_{Amax}</th> </tr> </thead> <tbody> <tr> <td>At any private residential receiver</td> <td>60</td> <td>50</td> <td>50</td> <td>55</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> To identify a residential receiver location, refer to Appendix F of the EIS Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy These criteria have been developed for this specific Development; however it is recognised that the site is zoned for heavy industrial purpose and that ultimately the amenity of the area should be controlled by the criteria contained in Table 2.1 of the Industrial Noise Policy. 	Location	Day L _{Aeq} (15min)	Evening L _{Aeq} (15min)	Night L _{Aeq} (15min)	Night L _{Amax}	At any private residential receiver	60	50	50	55	G	Active/ongoing	<p>Compliant for Terminal (Land) and Demolition</p> <p>Non-Compliant for shipping noise in 2016 IEA</p>	<p>Refer to previous DPE Annual Review reports.</p> <p>Sound Science System remains insitu at the Wharf as a permanent operational tool</p> <p>2024 Comment: Refer to DPE Annual Review, Section 2.4.2 for commentary on system</p> <p>Note: <u>4</u> Community complaints in 2024. Refer to Sections 2.3 and 2.5 for details.</p>					
Location	Day L _{Aeq} (15min)	Evening L _{Aeq} (15min)	Night L _{Aeq} (15min)	Night L _{Amax}																
At any private residential receiver	60	50	50	55																
Hours of Construction and Operation																				
C18	<p>With exception of the works identified in conditions C19 and C20, the Applicant shall comply with the hours detailed in table 4.</p> <p>Table 4: Construction, Demolition & Operation Hours</p> <table border="1" data-bbox="168 1062 732 1351"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td>Construction</td> <td>Monday - Sunday</td> <td>7.00am – 10.00pm</td> </tr> <tr> <td>Demolition</td> <td>Monday - Sunday</td> <td>7.00am – 10.00pm</td> </tr> <tr> <td>Operation</td> <td>Monday - Sunday</td> <td>24 hours</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Activity	Day	Time	Construction	Monday - Sunday	7.00am – 10.00pm	Demolition	Monday - Sunday	7.00am – 10.00pm	Operation	Monday - Sunday	24 hours				G	Active/ongoing	Compliant.	<p>The Conversion to Terminal project concluded on <u>31 March 2020</u>.</p> <p>2024 Comment</p> <p>Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p>
Activity	Day	Time																		
Construction	Monday - Sunday	7.00am – 10.00pm																		
Demolition	Monday - Sunday	7.00am – 10.00pm																		
Operation	Monday - Sunday	24 hours																		

ANNUAL REVIEW 2024
ENVIRONMENTAL PERFORMANCE

C19	High noise generating construction and demolition works, including the pipeline removal works within the Eastern and Western Right of Ways, shall be confined to less sensitive times of the day, and shall not be undertaken on Sundays or public holidays or outside of the hours 7.00am and 6.00pm Monday to Saturday.	C & D	This phase has been completed	Compliant Assessed in all IEAs to date.	Not triggered
C20	Construction works outside of the work hours identified in condition C18 above may be undertaken in the following circumstances: (a) works that are inaudible at nearest sensitive land receivers; (b) works that are consistent with Caltex's existing maintenance procedures and are in accordance with the existing EPL; (c) works agreed to in writing by the EPA or the Department; (d) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (e) where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm.	C & D	This phase has been completed	Compliant	Not triggered The Conversion to Terminal project concluded on <u>31 March 2020</u> .
Operating Conditions					
C21	The Applicant shall: (a) implement best management practice, including all reasonable and feasible noise management and mitigation measures to prevent and minimise operational, low frequency and traffic noise generated by the proposal; (b) minimise the noise impacts of the development during adverse meteorological conditions when noise criteria do not apply; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	T	Active/ongoing	Compliant	2024 Update: 5 x shipping noise exceedences report to NSW EPA 4 Community Complaints

	Noise Management Plan				
C22	<p>The Applicant shall prepare and implement a Noise Management Plan for construction works and <u>site operations</u>. The plan (s) shall:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced person, in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing); (c) describe the measures that will be implemented to minimise noise from the construction and operation of the development including: <ul style="list-style-type: none"> · all reasonable and feasible measures being employed on site; · maintain equipment to ensure that it is in good order; · traffic noise is effectively managed; and · the noise impacts of the development are minimised during any meteorological conditions when the noise criteria in this consent do not apply; · identification of high noise generating construction activities, including proposed times when these works will be carried out (including respite periods if required) and mitigation measures to minimise adverse impacts from these activities; · compliance with the relevant conditions of this consent. (d) includes a noise monitoring program that: <ul style="list-style-type: none"> · shall be carried out until otherwise agreed to in writing by the Secretary; · is capable of evaluating the performance of the Development; and · includes a protocol for determining exceedances of the relevant conditions of this consent and responding to complaints. 	C & T	<p>Plan Completed & Approved</p> <p>Active/ongoing for Terminal operations</p>	<p>Compliant for Plan but non-compliant for recording one event in 2016 IEA.</p> <p>Compliant confirmed during 2017 and 2021 IEAs</p>	<p>2024 Update:</p> <p>Site wide approach to noise management with special measure in place for shipping noise.</p> <p>All maintenance covered by PTW requirements.</p> <p>Terminal Noise Management Plan previously approved by DPE</p> <p>Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p>

C22 A	<p>The Applicant shall update and implement the Noise Management Plan for the demolition works to the satisfaction of the Secretary. This plan is to update the plan approved under condition C22 and shall also:</p> <ul style="list-style-type: none"> a) be approved by the Secretary (refer to conditions D1A and D2 for timing); b) outline the procedures for the notification of all potentially affected persons at least one week prior to and during high noise generating works; c) implement reasonable and feasible noise and vibration management and mitigation measures during demolition activities within the Caltex Terminal; d) implement reasonable and feasible noise and vibration monitoring and management measures during removal of pipelines from the Eastern and Western ROW to minimise noise and vibration impacts generated by the pipeline removal works; and e) include strategies for monitoring vibration impacts on buildings with medium to high heritage significance proposed to be retained within the Caltex Terminal. f) 	D	Plan Completed & Approved	Compliant Assessed during 2016, 2017 and 2021 IEAs	Not triggered The Conversion to Terminal project concluded on 31 March 2020.
Construction Vibration					
C23	<p>The Applicant shall aim to achieve the following construction and demolition vibration goals:</p> <ul style="list-style-type: none"> (a) for structural damage, the vibration limits set out in the <i>German Standard DIN 4150-3: Structural Vibration - effects of vibration on structures</i>; and (b) (b) for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006)</i>. 	C & D	This phase has been completed	Compliant Assessed during 2016, 2017 and 2021 IEAs	Not triggered The relevant regulatory approval requirement has previously been met and assessed as compliant

AIR QUALITY MANAGEMENT					
Dust Generation During Construction					
C24	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated during <u>construction works and demolition works</u> .	C & D	This phase has been completed	Compliant	The Conversion to Terminal project concluded on <u>31 March 2020</u> .
C25	During construction and demolition works, the Applicant shall ensure that: <ul style="list-style-type: none"> (a) all trucks entering or leaving the site have their loads covered; (b) trucks associated with the Development do not track dirt onto the public road network; and (c) any dirt on public roads as a result of the development is promptly removed. 	C & D	This phase has been completed	Compliant Assessed during 2016, 2017 and 2021 IEAs	See comments above
Offensive Odour					
C26	The Applicant shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the POEO Act.	G	Active/ongoing	Compliant	2024 Comment: Refer to Section 2.4 for discussion on reported odour complaints and Odour Abatement and Mitigation Program Odour complaints data reviewed during 2024 ISO:EMS Surveillance V1 .

Operating Conditions					
C27	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement all reasonable and feasible dust and odour mitigation measures to prevent and minimise odour and dust emissions from operations; (b) prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; (c) minimise any visible off-site air pollution; and (d) minimise surface disturbance of the site, other than as permitted under this consent. 	G	Active/ongoing	Compliant	<p>2024 Comment:</p> <p>Refer to comments above and Section 2.4 for further discussion on Odour Abatement and Mitigation Program</p>
Air Quality Management Plan					
C28	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the proposed <u>construction</u> works. The plan shall:</p> <ul style="list-style-type: none"> (a) be prepared and implemented by a suitably qualified and experienced expert in consultation with the EPA and NSW Health; (b) be approved by the Secretary (refer to Condition D1 for timing); (c) describe the measures that would be implemented on site to ensure: <ul style="list-style-type: none"> i. the control of air quality and odour impacts of the Development; ii. that these controls remain effective over time; iii. that all reasonable and feasible air quality management practices is employed; iv. the air quality impacts are minimised during adverse meteorological conditions and extraordinary events; and v. compliance with the relevant conditions of this consent. (d) describes the air quality & odour management system; (e) includes an air quality monitoring program that: <ul style="list-style-type: none"> i. is capable of evaluating the performance of the proposal; ii. includes a protocol for determining any exceedances of the relevant conditions of consent and responding to complaints; iii. adequately supports the air quality management system; and iv. evaluates and reports on the effectiveness of the air quality management system. 	C	<p>Plan Completed & Approved</p> <p>This phase has been completed</p>	<p>Compliant for Conversion works and Terminals</p> <p>Compliant</p> <p>Assessed during 2016, 2017 and 2021 IEAs</p>	<p>2024 Comment:</p> <p>Refer to comments above and Section 2.4 for further discussion on Odour Abatement and Mitigation Program</p>

28A	<p>The Applicant shall update and implement the Air Quality Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to update the plan approved under condition C28 and shall also:</p> <ul style="list-style-type: none"> (a) be approved by the Secretary (refer to conditions D1a and D2 for timing); (b) outline procedures for VOC, odour and dust deposition monitoring and suppression methods during excavation works and where potential hydrocarbon contamination is present; and (c) include dust suppression measures and procedures for dust monitoring during operation of the concrete crusher. 	D	<p>Plan Completed & Approved</p> <p>Active/ongoing</p>	<p>Compliant</p> <p>Identified as a low risk Non-Compliance in 2016 IEA</p> <p>Demolition Air Quality Management Plan was subsequently approved by DPE and verified by IEA Auditor in 2017.</p>	<p>Conversion project concluded 31 Mar 2020</p>
Air Quality Verification					
C29	<p>The Applicant shall carry out an air quality verification study for the development. The study shall:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified expert; (b) be completed within 24 months of the commencement of operations or as otherwise agreed to by the Secretary; (c) be based on the average of emissions over a continuous 12 month period after commencement of operations, taking into account the throughput and type of fuel; (d) include a validation of the accuracy of the modelling predictions in the EIS; (e) verify that compliance with any limits or conditions in the EPL are achieved; (f) verify, using reasonable means, the effectiveness of any emission control measures that have been implemented to minimise air quality impacts; and (g) demonstrate compliance with the relevant regulatory criteria. 	T	<p>This phase has been completed</p>	<p>Compliant</p>	<p>2024 Comment: as per previous updates:</p> <p>The Air Quality Verification Study was submitted to DPE in Jan 2019</p> <p>Note:</p> <p>Study reviewed during 2021 IEA</p>

HERITAGE MANAGEMENT					
Archival Record					
C30	<p>The Applicant shall commission an appropriately qualified heritage expert to undertake an archival photographic recording of the existing fabric and operation of the Kurnell Refinery while the plant is still operational and during the decommissioning process. The recording should include a range of media and shall be undertaken in accordance with the current Heritage Council Guidelines on Photographic Recording of Heritage Items Using Film or Digital Capture (2006).</p> <p>The archival recording shall be submitted to the Heritage Council of NSW, Sutherland Shire Library and the NSW State Library within 12 months of the closure of the refinery and prior to the removal or demolition of any existing elements.</p>	C	<p>This phase has been completed</p> <p>Assessed in 2016 and 2017 IEA's EA</p>	<p>Compliant</p> <p>Further changes to the approved Heritage Strategy – DPE notified 26 Jul 18 after tornado damage to some heritage listed buildings (sever structural damage & needed to be demolished)</p> <p>Amended report sent 27 Aug 18</p>	<p>Note:</p> <p>Caltex Kurnell Refinery History book reviewed by auditor during 2021 IEA</p>

Heritage Management Strategy					
C31	<p>The Applicant shall prepare and implement a Heritage Management Strategy for the Australian Oil Refinery site prior to shut down of the refinery plant. The Strategy must:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified person in consultation with Council and the Heritage Council of NSW; (b) be submitted to the Secretary for approval at least 2 months prior to the shut-down of the refinery plant; (c) review the heritage significance of the Australian Oil Refinery site; and (d) set out a framework to minimise or mitigate the loss of heritage value during the decommissioning process, and for the ongoing management of the Site's heritage during present and future works. 	C	<p>Verified as Completed</p> <p>Assessed in 2016 and 2017 IEA</p>	<p>Compliant</p> <p>Assessed during 2016, 2017 and 2021 IEAs</p> <p>Refer to above comments</p>	<p>Note comments under "Activity Status" Phase</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p>
31A	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) continue to implement the Heritage Management Strategy prior to and during the demolition works; and (b) implement the recommendations stated in Chapter 4 and 5 of the document titled: <i>Caltex Kurnell Refinery Demolition: Heritage Impact Statement by Australian Museum Consulting for URS Australia Pty Ltd, October 2014.</i> 	D	<p>This phase has been completed</p>	<p>Compliant</p>	<p>2021 IEA</p> <p>Auditor noted NIL breaches</p>
Other Heritage Management and Mitigation Measures					
32	<p>The Applicant shall, prior to shut down of the refinery:</p> <ul style="list-style-type: none"> (a) form an in- house team to manage documentation and interpretation of the history of the refinery, including the production of a colour book; (b) liaise with the Mitchell Library to prepare a photographic record of the site and people associated with the refinery for inclusion in the library's archives; and (c) engage a professional photographer to prepare a photographic exhibition of the refinery. The location(s) and duration of the exhibition shall be to the satisfaction of Council and the NSW Heritage Council. 	C	<p>This phase has been completed</p>	<p>Compliant</p> <p>Assessed in 2016 IEA</p>	<p>Not Triggered</p>

ANNUAL REVIEW 2024
ENVIRONMENTAL PERFORMANCE

32A	Within two months of its <u>scheduled demolition</u> , the Applicant shall undertake a final review of the adaptive reuse capabilities of highly significant buildings which are proposed to be demolished as per the recommendations of the Heritage Management Strategy.	D	This phase has been completed	Compliant	There were 7 buildings identified in this category (Demolition Heritage Impact Assessment pg. 105). As per 2018 Update:
32B	Within two months of its <u>scheduled demolition</u> , the Applicant shall complete appropriate archival records of items to be demolished as per the recommendations of the Heritage Management Strategy and other initiatives supported by the Heritage Division of the OEH.	D	This phase has been completed	Compliant	Refer to C30 for comments re amendments to the Strategy
32C	The Applicant shall implement the recommendations in section 5.2 of the document titled Caltex Kurnell Refinery Demolition: Heritage Impact Assessment, prepared by Australian Museum Consulting and enclosed in Appendix F of the SEE, for the pipeline removal works on Silver Beach to the satisfaction of Council.	D	This phase has been completed	Compliant	The Conversion to Terminal project concluded on 31 March 2020.
Potential for Discovery of Aboriginal and Non-Aboriginal Heritage Objects					
C33	If during the course of <u>of construction and demolition</u> the Applicant becomes aware of any previously unidentified heritage object(s), all work likely to affect the object(s) shall cease immediately and the Heritage Council of New South Wales shall be notified immediately in accordance with section 146 of the Heritage Act 1977. Relevant works shall not recommence until written authorisation from the Heritage Council of NSW is received by the Applicant.	C & D	This phase has been completed	Compliant	2024 Comment: Nil heritage object or aboriginal artefacts or objects identified during (operational) maintenance work , Project works or remediation project works during 2024reporting period
C34	If during the course of <u>construction and demolition</u> the Applicant becomes aware of any previously unidentified Aboriginal object(s), all work likely to affect the object(s) shall cease immediately and the OEH informed in accordance with section 89A of the National Parks and Wildlife Act 1974. Relevant works shall not recommence until written authorisation from OEH is received by the Applicant.	C & D	This phase has been completed	Compliant	Reporting requirements referenced in Site Induction program

Energy Efficiency And Greenhouse Gas Emission					
Managing Energy Efficiency & Greenhouse Gas Emissions					
C35	The Applicant shall implement all reasonable and feasible measures to minimise: (a) energy use; and (b) greenhouse gas emissions, throughout the life of the development, to the satisfaction of the Secretary.	G	Active/ongoing	Compliant Assessed in 2016 and 2017 IEA	2024 Update: Annual NPI and NGER reports issued for the site.
TRANSPORT AND ACCESS					
Traffic Management Plan					
C36	The Applicant shall prepare and implement a Traffic Management Plan <u>for the Development</u> , to the satisfaction of the Secretary. The plan must: (a) be prepared and implemented by a suitably qualified and experienced person; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing); (c) detail the measures that would be implemented to ensure road safety and network efficiency during construction and operation including (but not limited to): . installation of signage and implementation of maximum speeds limits on internal roads; and . final details of the proposed traffic control measures. . details for rationalisation of the entry and exit to the site, particularly if the weigh bridge is no longer required, to improve the management of traffic and parking for members of the general public in this area (d) include a plan showing the route to be used by heavy vehicles during construction and operation; (e) detail the access and parking arrangements for the site during construction and operation; (f) include a Driver Code of Conduct that details the traffic management measures to be implemented during construction and operation to: . minimise the impacts of the development on the local and regional road network; . minimise conflicts with other road users; and . ensure truck drivers use specified routes. (g) describe the measures that will be implemented to ensure: . the nominated heavy vehicle route is used;	G	Completed Active/ongoing	Compliant Assessed in 2016 and 2017 IEA	2024 Comment: Ongoing compliance verified during 2024 ISO:EMS Surveillance V1 . 2021 Update: The Conversion to Terminal project concluded on 31 March 2020 . Reviewed during 2021 IEA Submission of 2021 amended Ampol Kurnell Terminal OEMP Stage 2 Final on 7 March and DPIE Approval letter sighted.

	<ul style="list-style-type: none"> · drivers adhere to the code of conduct; and · compliance with the relevant conditions of this consent. <ul style="list-style-type: none"> (h) include a program to monitor the effectiveness of these measures; and (i) (i) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 				
C36 A	<p>The Applicant shall update and implement the Traffic Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to update the plan approved under condition C36 and shall also:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council; (b) be approved by the Secretary (refer to conditions D1A for timing); (c) include the designated routes for demolition traffic to the demolition areas within the site; (d) include details of traffic management arrangements for the cooling water outlet and intake pipeline removal works within the road reserves; and (e) outline the procedures for the notification of all potentially affected persons prior to and during the pipeline removal works within the road reserves. 	D	This phase has been completed	Compliant Compliant Assessed in 2017 IEA	
C36 B	<p>The Applicant shall ensure that the pipeline removal works along the road reserves on Captain Cook Drive, Prince Charles Parade and Cook Street are undertaken in consultation with Council and do not take place during public events or public holidays in Kurnell.</p>	D	This phase has been completed	Compliant	These works were completed in 2019 with NIL incidents
Car Parking					
C37	<p>The Applicant shall provide sufficient parking facilities on-site for construction, demolition and <u>operational personnel</u>, and heavy vehicles, to ensure that construction and operational traffic associated with the Development do not utilise public and residential streets or public parking facilities for parking.</p>	G	Active/ongoing	Compliant	2024 Update: Remains in compliance with TMP

ANNUAL REVIEW 2024
ENVIRONMENTAL PERFORMANCE

C37 A	Within 18 months after commencement of the demolition works, the Applicant shall: (a) complete a review, in consultation with Council, of the Cook Street approach to the Caltex Terminal site considering issues relating to signage, car parking arrangements, vehicle flows and the future of the weighbridge; and (b) include a timetable of implementation of the findings of this review. Note: The implementations of the findings of this review may require further approval under the EP&A Act.	D	This phase has been completed	Not triggered	Refer to comments in C36
WASTE MANAGEMENT					
Waste Management On-Site					
C38	The Applicant shall (a) minimise the waste generated on site; and (b) ensure that the waste generated by the development is appropriately stored, handled and disposed of, to the satisfaction of the Secretary.	G	Active/ongoing	Compliant Assessed in 2016 and 2017 IEA	2024 Update: Ongoing compliance to waste mgmt. program assessed and verified during 2024 ISO Recertification Audit
C39	The Applicant shall ensure that any waste generated on the site during <u>construction and demolition</u> is classified in accordance with the EPA's Waste Classification Guidelines and disposed of to a facility that may lawfully accept the waste.	C & D	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA	The Conversion to Terminal project concluded on <u>31 March 2020</u> . 2024 Update:
C39 A	The Applicant shall ensure that all hazardous materials identified in the structures to be demolished are <u>removed prior to demolition</u> where it is safe and practical to do so.	D	This phase has been completed	Compliant Assessed in 2016 and 2017 IEA	Ongoing compliance to waste mgmt. program assessed and verified during 2024 ISO:EMS Surveillance V1 .
C39 B	The Applicant shall ensure that the reuse of any materials (including soil, scrap metal or building materials) on site must be fit for purpose and must not result in any adverse impacts to the environment.	D	This phase has been completed	Compliant – concreted deemed to be uncontaminated crushed and used on site in cleared areas	

C39 C	Where it is safe and practical to do so, the Applicant should as far as practicable sort all waste materials generated during <u>demolition works</u> to maximise opportunities for the beneficial reuse and recycling of such waste materials.	D	This phase has been completed	Compliant	The Conversion to Terminal project concluded on <u>31 March 2020</u> .
Waste Management Plan					
C40	The Applicant shall prepare and implement a <u>Waste Management Plan</u> for the development to the satisfaction of the Secretary. This Plan shall: (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to timing in Conditions D1 and D2) (c) detail the type and quantity of waste to be generated by construction and operational phases of the development; (d) detail the materials to be reused or recycled, either on or off site; and (e) detail the procedures for handling, storage, collection of recycling and disposal of waste."	G	Plan Completed & Approved Active/ongoing	Compliant	2024 Comment: Ongoing compliance verified during <u>2024 ISO:EMS Surveillance V1</u> .
Demolition Waste and Resource Management Plan					
C40 A	The Applicant shall prepare and implement a Demolition Waste and Resource Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to update the plan approved under condition C40 and shall also: (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to condition D1a for timing); (c) outline the measures for the removal, storage and disposal of all waste materials generated during the demolition works; and (d) outline the waste reuse and recovery strategy for the demolition works.	D	This phase has been completed Plan Completed & Approved	Compliant	See above comments Demolition Project ended 31 March 2020

Waste Received from Off-Site					
C41	The Applicant shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997, if such a licence is required in relation to that waste.	G	Statement	Compliant	Nil wastes received to site
C41 A	The Applicant shall ensure that the removal of the cooling water outlet pipeline 20 metres seaward from the low tide mark in Botany Bay is carried out in a manner that minimises the potential for disturbance and/or spread of <i>Caulerpa taxifolia</i> .	D	This phase has been completed	Compliant	As per previous updates: Outlet line successfully removed with nil observable environmental effect The Conversion to Terminal project concluded on <u>31 March 2020</u> .
BIODIVERSITY & ECOLOGY					
Biodiversity Management Plan					
C42	The Applicant shall prepare and implement a Biodiversity Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the EPA; (b) be approved by the Secretary (refer to Conditions D1 and D2 for timing);; (c) include measures to be taken to minimise impacts on flora and fauna; (d) include a program with timeframes for implementation of the relevant recommendations contained in the Ecology Impact Assessment in Appendix I of the EIS, and the Management and Mitigation Measures contained in Chapter 19 of the EIS to minimise impacts on flora and fauna and maintain the biodiversity value of the site and surrounding environment.	G	Active/ongoing Plan Completed & Approved	Compliant	2024 Comment: Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.

Pest, Vermin & Noxious Weed Management					
C43	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) implement suitable measures to manage pests, vermin and declared noxious weeds on site; (b) measures to be taken to prevent the spread of any identified noxious/exotic weeds off site; and (c) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in surrounding area. <p><i>Note: For the purposes of this condition, noxious weeds are those species subject to an order declared under the Noxious Weed Act 1993.</i></p>	G	Active/ongoing	Compliant	<p>2024 Update:</p> <p>Native vegetation along the Yena Gap Pipeline in the Kamay Botany Bay National Park was trimmed under WSP Ecologist supervision, in line with the new (2023) approved National Parks And Wildlife Service Consent.</p> <p>National Parks undertook addition fire reduction works in this area in 2024.</p> <p>Annual maintenance task (PM M7) established to inspect (and trim if needed) defined area around the pipeline</p>
C43 A	<p>The Applicant shall update and implement the Biodiversity and Weed Management Plan for the <u>demolition works</u> to the satisfaction of the Secretary. This plan is to consolidate the plans approved under conditions C42 and C43 and shall also:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with the OEH; (b) be approved by the Secretary (Refer to condition D1A for timing); and NSW Government 9 Department of Planning and Environment (c) include details of pre-clearing inspections and frog exclusion measures to be undertaken prior to excavation along the Continental Carbon Pipeway Right of Way. 	G	<p>Plan Completed & Approved</p> <p>This phase has been completed</p>	Compliant	<p>DPE approval of the OEMP and all Management Plans – including Biodiversity and Weed Management Sub Plan</p> <p>Note:</p> <p>The Conversion to Terminal project concluded on <u>31 March 2020</u></p>

Continental Carbon Pipeline					
C43 B	<p>Within three months after <u>the removal of the Continental Carbon Pipeline</u>, the Applicant shall prepare a strategy, in consultation with the OEH, for the active management of the former pipeline route including a program for weed management and removal as outlined in Management and Mitigation Measure K6 in Appendix C of this consent. The Applicant shall have commenced implementation of this strategy six months after the removal of the Continental Carbon Pipeline.</p>	D	This phase has been completed	<p>Compliant</p> <p>Removed in 2017</p> <p>Assessed in 2017 IEA</p>	The Conversion to Terminal project concluded on 31 March 2020.
Cooling Water Outlet Management Plan					
C43 C	<p>The Applicant shall prepare and implement a Cooling Water Outlet Management Plan for the <u>demolition works</u>. The plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council; (b) be approved by the Secretary (see condition D1A for timing); (c) include details of the timing and excavation program for pipeline removal, demolition methods, details of stockpiling, removal or reuse of excavated materials and the use of imported soils; (d) outline the measures to be taken to minimise potential marine ecology impacts including measures to: <ul style="list-style-type: none"> • minimise sediment plumes particularly during backfilling activities; • minimise the potential for hydrocarbon contamination from the pipeline; • minimise disturbance and impact on any seagrass communities; and • maintain machinery and equipment; and • exclude people and animals from the works both landward and seaward; <ul style="list-style-type: none"> (e) include details of the odour suppression measures during the pipeline removal works; and (f) include details of the works on Silver Beach including: <ul style="list-style-type: none"> • measures to minimise impacts to the affected sand dunes on Silver Beach including dune erosion and damage to vegetation; and • strategies for stabilising and restoring the affected sand dunes including exclusion measures and revegetation strategies. 	D	This phase has been completed	<p>Compliant</p>	<p>As per previous updates:</p> <p>Stage 2 Cooling Water Outlet Management Plan approved</p> <p>Cooling Water Outlet line successfully removed with nil observable environmental effect</p> <p>SSC provided favourable feedback on execution of Plan and the restoration works completed.</p> <p>The Conversion to Terminal project concluded on <u>31 March 2020</u>.</p>

	Protection of Marton Park Wetlands				
C44	To ensure that the measures implemented to protect Marton Park Wetland from sedimentation, erosion and possible contaminants related to the stormwater drainage upgrade works approved by Sutherland Shire Council (DA 13/0195) are successful, monitoring of Marton park Wetland must be undertaken after completion of the stormwater upgrade works, until otherwise agreed with Council, to ensure there are no detrimental impacts on the wetland. Caltex is to prepare a monitoring plan and submit it to Council for approval prior to completion of stormwater drainage upgrade works.	G	This phase has been completed	Compliant Assessed in 2016 IEA	As per previous updates: DA surrendered (March 2016).
	VISUAL				
	Lighting				
C45	The Applicant shall ensure that the lighting associated with the development: (a) complies with the latest version of AS 4282(INT) – <i>Control of Obtrusive Effects of Outdoor Lighting</i> ; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	G	Statement	Compliant Assessed during 2016, 2017 and 2021 IEAs	2021 Update: 2021 IEA: Auditor noted NIL breaches
	Signage and Fencing				
C46	The Applicant shall not install any advertising on site without the written approval of the Secretary.	G	Statement	Compliant Assessed in 2016 and 2017 IEA	2024 Comment: Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.
	SITE SECURITY				
	Site Security				
C47	The Applicant shall ensure that: (a) site fencing and security gates are installed to the satisfaction of the Secretary; and (b) the security gates on site are locked whenever the site is unattended.	G	Statement	Compliant Assessed in 2016 and 2017 IEA	2024 Comment: Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.

SCHEDULE D ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING					
Construction Environment Management Plan					
D1	<p>The Applicant shall prepare and implement a <u>Construction Environmental Management Plan</u> for the Development to the satisfaction of the Secretary. The Plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Sutherland Shire Council and the EPA; (b) be submitted to the Secretary for approval no later than four (4) weeks prior to the commencement of construction or demolition, or within such period otherwise agreed by the Secretary; (c) identify the statutory Consents that apply to the Development; (d) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (e) outline all environmental management practices and procedures to be followed during <u>construction and demolition works</u> associated with the Development; (f) describe all activities to be undertaken on the site during construction of the Development, including a clear indication of construction stages; (g) incorporate all relevant management and mitigation measures contained in the EIS and RTS; (h) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> (i) Human Health and Ecological Risk management - which shall be mitigated and managed in accordance with Section 6.2 of the “Human Health and Ecological Qualitative Risk Assessment” report prepared by URS, dated 28 February 2013 and the relevant Management and Mitigation Measures contained in Appendix C of this consent; (ii) Biodiversity and Weed management; (iii) Soils and Erosion management; (iv) Contamination management; (v) Noise and Vibration management; (vi) Air Quality management; 	C	<p>This phase has been completed</p> <p>Plan Completed & Approved</p>	<p>Completed</p> <p>Non- Compliant against (h) in 2016 IEA</p> <p>Identified as an Administrative Non-Compliance in 2016 IEA</p> <p>Completion of corrective actions assessed in 2017 IEA</p> <p>DPE Approved Construction EMP and Management Plans remains available on Ampol Public website</p>	<p>Conversion works completed in <u>2016</u></p> <p>Note comments under “Activity Status” Phase</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p>

<p>(vii) Stormwater and Wastewater management; (viii) Traffic management; (ix) Heritage management (Aboriginal and non-Aboriginal); (x) Waste and Resource management; (xi) Groundwater management; (xii) Acid Sulfate Soils management – if required; (xiii) Emergency (including spill) management; (xiv) means for assessing (and where identified) for managing interactions and cumulative impacts from the concurrent construction of other development works in the area should these coincide with the Development (e.g. the Caltex Ports and Berthing upgrade, remediation projects);</p> <ul style="list-style-type: none"> (i) describe the roles and responsibilities for all relevant employees involved in construction and demolition works associated with the Development; (j) include arrangements for community consultation, including consultation with the NSW Department of Education and local schools at key stages of the development that may affect school operations, to identify issues and mitigate impacts throughout the course of the Development. (k) Include a complaints handling procedure during construction and demolition and operation; and, (l) include appropriate procedures to allow the regular review of the requirements of each plan to ensure that they are effective and allow for adaptive management to address contingencies that may arise over the life of the development. <p>The approval of a Construction Environmental Management Plan does not relieve the Applicant of any requirement associated with this development consent. If there is an inconsistency with an approved Construction Environmental Management Plan and the conditions of this development consent, the requirements of this development consent prevail</p> <p>Construction of the development shall not commence until written consent of this plan has been received from the Secretary.</p>				
---	--	--	--	--

Demolition Environmental Management Plan					
D1A	<p>The Applicant shall prepare and implement a <u>Demolition Environmental Management Plan</u> for the demolition works to the satisfaction of the Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with Council, EPA and NSW Health; (b) be submitted to the Secretary for approval no later than four (4) weeks prior to the commencement of the demolition works, or within such period otherwise agreed by the Secretary; (c) identify the statutory approvals and consents that apply to the development; NSW Government 10 Department of Planning and Environment (d) consolidate all relevant management plans and monitoring programs required in the conditions of this Consent; (e) outline all environmental management practices and procedures to be followed during demolition works associated with the development; (f) describe all activities to be undertaken on the site during demolition works associated with the development, including a clear indication of demolition stages; (g) incorporate all relevant management and mitigation measures contained in the SEE; (h) detail how the environmental performance of the demolition works will be monitored, and what actions will be taken to address potentially adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: <ul style="list-style-type: none"> i. Biodiversity and weed management (See Condition C43A); ii. Soils and water management (See Condition C12A); iii. Contamination management (See Condition C15A); iv. Noise and vibration management (See Condition C22A); v. Air quality management (See Condition C28A); vi. Stormwater and wastewater management (See Condition C12A); vii. Traffic management (See Condition C36A); viii. Demolition waste and resource management (See Condition C40A); ix. Groundwater management, including measures which are consistent with the relevant Management and Mitigation Measures contained in Appendix C of this consent; x. Acid sulphate soils management (See Condition C14); 	D	<p>Plan Completed & Approved</p> <p>This phase has been completed</p>	<p>Assessed in 2017 and 2021 IEAs</p> <p>DPE Approved Demolition and Management Plans remains available on Ampol Public website</p>	<p>2021 Update:</p> <p>Compliance during demolition phase assessed during 2021 IEA</p> <p>Note comments under “Activity Status” Phase</p> <p>The relevant regulatory approval requirement has previously been met and assessed as compliant</p> <p>Auditor noted NIL breaches</p>

<p>xi. Heritage management strategy (See Condition C31); xii. Cooling water outlet management (see Condition C42B); xiii. pipeline removal works on Kurnell Wharf, including details of the timing and program of works, demolition and removal techniques, and the measures to manage traffic and access to the wharf. xiv. means for assessing (and where identified) for managing interactions and cumulative impacts from the concurrent construction of other development works within the site should these coincide with the Development (e.g. the Caltex Ports and Berthing upgrade, remediation projects).</p> <ul style="list-style-type: none"> (i) describe the roles and responsibilities for all relevant employees involved in the demolition works associated with the Development; (j) include details of a community notification protocol to notify potentially affected persons (including the local community and surrounding industries) of works which are likely to cause significant adverse impacts to the environment; (k) include a complaints handling procedure; and (l) include appropriate procedures to allow the regular review of the requirements of each plan to ensure that they are effective and allow for adaptive management to address issues that may arise over the life of the development. <p>The approval of a <u>Demolition Environmental Management Plan</u> does not relieve the Applicant of any requirement associated with this development consent. If there is an inconsistency with an approved Demolition Environmental Management Plan and the conditions of this development consent, the requirements of this development consent prevail.</p> <p>Demolition works shall not commence until written approval of this plan has been received from the Secretary.</p>				
---	--	--	--	--

Operational Environmental Management Plan					
D2	<p>The Applicant shall prepare and implement an <u>Operational Environmental Management Plan</u> for the project to the satisfaction of the Secretary. This Plan must:</p> <ul style="list-style-type: none"> (a) be approved by the Secretary prior to the completion of the Development; (b) provide the strategic framework for environmental management of the project; (c) identify the statutory approvals that apply to the project; (d) include a copy of all relevant management plans and monitoring programs relevant under this consent; (e) outline all environmental management practices and procedures to be followed during operation; (f) describe all activities to be undertaken on the site during operation; (g) detail how the environmental performance of the operation of the project will be monitored, and what actions will be taken to address identified adverse environmental impacts; (h) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; (i) describe the procedures that will be implemented to: <ul style="list-style-type: none"> · keep the local community and relevant agencies informed about the operation and environmental performance of the project; · receive, handle, respond to, and record complaints; · resolve any disputes that may arise during the course of the project; · respond to any non-compliance; and · respond to emergencies; and (j) include: <ul style="list-style-type: none"> · copies of any strategies, plans and programs approved under the conditions of this consent; and · a clear plan depicting all the monitoring required to be carried out under the conditions of this consent. 	T	Plan Completed & Approved	Compliant	<p>2024 Comment:</p> <p>Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p> <p>OEMP (including all Management Sub-Plans) remains current, as approved by DPE</p>

	Management Plan Requirements				
D3	<p>The Applicant shall ensure that the <u>Management Plans</u> required under this consent are prepared in accordance with any relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) detailed baseline data; (b) a description of: <ul style="list-style-type: none"> · the relevant statutory requirements (including any relevant approval, licence or lease conditions); · any relevant limits or performance measures/criteria; and · 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 will be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: <ul style="list-style-type: none"> · impacts and environmental performance of the development; and · 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: <ul style="list-style-type: none"> · incidents; · complaints; · non-compliances with statutory requirements; and · exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. <p><i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i></p>	T	Active/ongoing Mgmt. Plans Completed	Compliant	<p>2024 Comment:</p> <p>Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p>

	Annual Review				
D4	<p>By 31 December 2014, or as otherwise agreed in writing by the Secretary, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against:</p> <ul style="list-style-type: none"> · the relevant statutory requirements, limits or performance measures/criteria; · the monitoring results of previous years; and · the relevant predictions in the EIS; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the Development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the Development.</p>	T	<p>Now completed for years :</p> <ul style="list-style-type: none"> • 2014, • 2015, • 2016, • 2018, • 2019; • 2020, • 2021, • 2022, and • 2024 <p>Active/ongoing</p>	Compliant	<p>2024 Comment:</p> <p>This is the 2024 Annual Review report</p> <p>All previous (approved) Annual Review Reports posted to Ampol Public website</p>

Revision of Strategies, Plans & Programs					
D5	<p>Within 3 months of the submission of an:</p> <p>(a) annual review under Condition D4 of this schedule; (b) incident report under Condition D6 of this schedule; (c) audit report under Condition D8 of this schedule; and (d) any modifications to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p><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></p>	G/T	Active/ongoing	Compliant	Refer to comments made in D2
REPORTING					
Incident Reporting					
D6	<p>The Applicant shall notify the Secretary and any other relevant agencies of any incident or potential incident with actual or potential significant off-site impacts on people or the biophysical environment associated with the development as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of this incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident.</p>	G/T	Active/ongoing	Compliant	<p>2024 Comment:</p> <p>Refer to Section 2.4.4 for details of incidents reported to NSW EPA.</p> <p>Additionally:</p> <p>The EPA receive email notifications of any ship that exceeds the EPL night-time noise limit</p>

INDEPENDENT ENVIRONMENTAL AUDIT					
D7	<p>Within a year 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 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 whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (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 these approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.</p> <p><i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i></p>	G	Active/ongoing	Compliant	<p>2024 Comment:</p> <p>The planned 2024 IEA has been deferred until May 2025 – as a “one off”</p> <p>(DPIH approval on 26 June 2024)</p> <p>Note Non-Compliance in 2016</p> <p>(2016 IEA started late)</p>
D8	<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>	G	Active/ongoing	Compliant	<p>Submitted for each IEA event – refer to comments in D4</p>

ACCESS TO INFORMATION					
D9	<p>The Applicant shall, to the satisfaction of the Secretary:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> · the EIS; SEE SSD5544 and MOD's 1, 2, 3, 4, 5 and 6; · current statutory approvals for the Development; · approved strategies, plans or programs; · a summary of the monitoring results of the Development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; · a complaints register, updated on a quarterly basis; · copies of any annual reviews (over the last 5 years); · any independent environmental audit, and the Applicant's response to the recommendations in any audit; and · any other matter required by the Secretary; and <p>(b) keep this information up to date,</p> <p><i>Note: This requirement does not require any confidential information to be made available to the public</i></p>	G	Active/ongoing	Compliant Consent documents and DPE Approved Construction, Demolition and Terminal EMP's and all Management Plans available on Ampol Public website	<p>2024 Comment:</p> <p>All documents/ information is posted on Ampol Public web site. Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p>

SSD 5544 MOD2 2018 - Asbestos Contaminated Soils (ACS) Management Works

SCHEDULE B – ADMINISTRATIVE CONDITIONS					
	Conditions	Applicable Phase: Conversion (C) Demolition Terminal Operations (D/T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive	Compliance Status Compliant Not Compliant Not Triggered	Comments/Actions
LIMITS OF CONSENT					
B7B	Notwithstanding Condition B7A, the ACS Management Works shall not extend beyond 30 April 2019	D	This phase has been completed	Compliant	Refer to MOD 4 and 5 regards changed to project end date (31 March 2020)
ACS MANAGEMENT WORKS					
Site Auditor					
C48	Prior to commencement of the ACS management works , the Applicant shall provide evidence that an EPA accredited Site Auditor has been appointed to review and approve the RAP and long-term environmental management plan (LTEMP) (see Conditions C54 and C55, respectively).	D	This phase has been completed	Compliant	2021 IEA – auditor noted EPA accredited site auditor appointed (Andre-Karl Smit – GHD) Sighted accreditation details on the NSW EPA website ref <i>Contaminated Lands Mgmt Act 1997</i>

Remedial Action Plan					
C49	<p>Prior to commencement of the ACS management works, the Applicant shall ensure the RAP is reviewed and approved by the Site Auditor. The Site Auditor shall be satisfied the design and construction methods outlined in the CQAP will achieve a level of containment which meets the remedial objectives described in the RAP.</p> <p>A copy of the Site Audit Report, Site Audit Statement shall be provided to the EPA and Secretary, which demonstrates the appropriateness of the RAP.</p> <p>Note: The Site Auditor should consider the Construction Quality Assurance Procedures in relation to the Environmental Guidelines: Solid Waste Landfills (EPA, 2nd Edition, 2016)</p>	D	This phase has been completed	Compliant	<p>2021 IEA – auditor noted DPE and EPA submission evidence sighted 25/2/2019 for Site Audit Statement and Site Audit Report (AKS10-10186 dated 12/12/18).</p>
Containment Cell					
C50	<p>Prior to commencement of the ACS management works, the Applicant shall prepare a Containment Cell Management Plan (CCMP) for the ACS management works. The plan shall be prepared in accordance with Condition D3 and shall:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s), in consultation with the EPA; (b) be approved by the Secretary; (c) describe details of the cell construction and filling activities including soil acceptance criteria for the containment cell; (d) describe the measures that will be implemented to ensure the control of soil, surface water, groundwater, air quality and noise impacts associated with the ACS management works; (e) include a register to detail the type and volume of material excavated and disposed of as part of the ACS management works; and (f) include details of dust, asbestos, waste and groundwater monitoring requirements. 	D	This phase has been completed	<p>Compliant</p> <p>DPE approved CCMP available on Ampol Public website</p>	<p>2021 IEA – auditor sighted evidence of NSW EPA consultation and approved CCMP on website.</p> <p>Approval letter dated 15/2/18 sighted CCMP available on Ampol Public website</p>

C51	The Applicant shall only place ACS sourced from within the site in the containment cell.	D	This phase has been completed	Compliant	
C52	Upon completion of the construction aspects associated with the ACS management works (which includes closure of the containment cell), the Applicant shall prepare a Containment Cell Final Report. The report shall: <ul style="list-style-type: none"> (a) be submitted to the EPA; (b) confirm the containment cell has been constructed in accordance with the CQAP; and (c) include a summary of the waste classification data (including characterisation and tracking) and monitoring data required under Condition C50 (e) and (f). 	D	This phase has been completed	Compliant	<p>2021 IEA – auditor sighted confirmation of receipt by DPE 8/10/20.</p> <p>Sighted AECOM Final Report 25/11/2020</p>
Long Term Environmental Management Plan					
C53	Prior to the completion of the construction aspects associated with the ACS management works, the Applicant in consultation with the EPA, shall prepare a LTEMP for the containment cell, to the satisfaction of the Site Auditor. A copy of the Site Audit Report and Site Audit Statement shall be provided to the EPA and Secretary, which demonstrates the appropriateness of the LTEMP	D/T	This phase has been completed	Compliant	<p>2021 IEA – auditor sighted DPE receipt email re C53 ACS Containment Cell LTEMP-incl RAR-SAS</p> <p>Sighted DPE receipt email re Kurnell Terminal Stage 2 Final OEMP on 08/03/2021</p> <p>Sighted DPE Approval Letter re:</p> <p>Stage Two Final OEMP incl. ACS Containment Cell LTEMP-incl RAR-SAS on 08/04/2021</p>

C54	<p>Upon completion of the construction aspects associated with the ACS management works (which includes closure of the containment cell) closure of the containment cell, the Applicant shall:</p> <p>(a) implement the approved LTEMP and manage the containment cell in accordance with the approved LTEMP; and</p> <p>(b) ensure the containment cell is listed on the relevant planning certificate for the land, issued under Section 149(5) of the EP&A Act, for the site.</p>	D/T	Active/Ongoing	<p>Re (a) - GW well gauging and leachate management system insitu at C/Cell included in M7 PM program</p> <p>Re (b) amendments to Planning Certificate (SSC) completed</p>	<p>Refer to comments in C53</p> <p>2024 Comment:</p> <p>Ongoing compliance to M7 PM program elements assessed during 2024 ISO:EMS Surveillance V1.</p> <p>Re (a) Sighted evidence M7 PM program:</p> <p>maintenance of ACS C/Cell -GW well gauging and leachate management system & Weed mgmt. insitu at C/Cell</p>
Pipeway Validation					
C55	<p>Upon completion of the construction aspects associated with the ACS management works, the Applicant shall prepare a Validation Report of the pipeways. The report shall:</p> <p>(a) be submitted to the EPA and the Secretary for review;</p> <p>(b) be prepared in accordance with the RAP and the <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (OEH 2011);</p> <p>(c) include details of the following:</p> <p>(i) sampling and analysis plan and sampling methodology; and</p> <p>(ii) results of any validation sampling compared to relevant guidelines/criteria.</p>	D	This phase has been completed in 2020	Validation Report submitted to DPE and NSW EPA - 8 Oct 2020	<p>2021 IEA – auditor noted:</p> <p>Sighted Modification works – Pipeways Closure report, dated 28/04/2020 meets C55 requirements.</p> <p>Sighted confirmation correspondence of submission of Validation Report to DPE and NSW EPA - dated 01/7/2020</p> <p>Sighted additional correspondence re Pipeways Closure from EPA dated 23/7/2020</p>

SSD 5544 MOD3 2018 – Tank 101 Demolition Works

SCHEDULE B – ADMINISTRATIVE CONDITIONS					
	Conditions	Applicable Phase: Conversion (C) Demolition Terminal Operations (D/T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive	Compliance Status Compliant Not Compliant Not Triggered	Comments/Actions
Pre-Commissioning					
D9	<p>The Applicant shall, to the satisfaction of the Secretary:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • SEE Approvals and MOD's 1, 2, 3, • <i>and accompanying documents</i>; • current statutory approvals for the Development; • approved strategies plans or programs; • a summary of the monitoring results of the Development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date,</p> <p>Note: This requirement does not require any confidential information to be made available to the public.</p>	D	<p>This phase has been completed</p> <p>Tank 101 demolished in 2018</p>	Compliant	<p>Refer to previous SSD5544 D9 comments made</p> <p>2021 IEA Auditor noted NIL breaches</p>

C4A	Prior to commencement of the Tank 101 demolition works described in MOD 3, the Applicant shall update and implement the Emergency Plan required under Condition C4(a) to incorporate the Tank 101 demolition works . The plan shall include information of the emergency arrangements during the tank demolition works and a copy of the plan shall be submitted to the Secretary.	D	This phase has been completed	Compliant Demolition of structures e.g. tanks already covered in ERP and scenarios	Conversion to Terminal project concluded on <u>31 March 2020</u> . Reviewed during 2021 IEA Auditor noted NIL breaches
Hours of Construction and Operation					
C19	High noise generation construction and demolition works including the pipeline removal works within the Eastern and Western Right of Ways, and the Tank 101 demolition works described in MOD 3 , shall be confined to less sensitive times of the day, and shall not be undertaken on Sundays or public holidays or outside of the hours 7:00am and 6:00pm Monday to Saturday	D	This phase has been completed	Compliant	Refer to comments made in C4A

SSD 5544 MOD 4 2018 - Extension of Demolition Works Period

SCHEDULE B – ADMINISTRATIVE CONDITIONS					
	Conditions	Applicable Phase: Conversion (C) Demolition Terminal Operations (D/T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive	Compliance Status Compliant Not Compliant Not Triggered	Comments/Actions
Pre-Commissioning					
B2	The Applicant shall carry out the Development generally in accordance with the: (a) EIS; (b) RTS; (c) site layout plans and drawings in the EIS (see Appendix A); (d) MOD 1; (e) MOD 2 (f) MOD 3 (g) MOD 4	G	Statement	Compliant	Refer to notes under MOD 5
B7A	The Demolition works associated with the development must not extend beyond 10 June 2019	D	This phase has been completed	Compliant	

ANNUAL REVIEW 2024
ENVIRONMENTAL PERFORMANCE

D9	<p>The Applicant shall, to the satisfaction of the Secretary:</p> <p>(c) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • SEE and MOD 1; • MOD 2 and its accompanying documents; • MOD 3 and its accompanying documents • MOD 4 and its accompanying documents • current statutory approvals for the Development; • approved strategies plans or programs; • a summary of the monitoring results of the Development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(d) keep this information up to date,</p> <p>Note: This requirement does not require any confidential info to be made available to the public</p>	G/T	Active/Ongoing	Compliant	<p>2024 Comment:</p> <p>Ongoing compliance verified during 2024 ISO:EMS Surveillance V1.</p> <p>Note: Recurrent actions assigned in Cintellate to review the Ampol Public Website every 3 months for currency and accuracy of content</p>
----	--	-----	----------------	-----------	--

SSD 5544 MOD5 July 2019

Asbestos contaminated soils containment cell capacity increase and end date extension, cooling water outlet pipeline amendments

SCHEDULE B – ADMINISTRATIVE CONDITIONS					
	Conditions	Applicable Phase: Conversion (C) Demolition Terminal Operations (D/T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive	Compliance Status Compliant Not Compliant Not Triggered	Comments/Actions
Pre-Commissioning					
B2	The Applicant shall carry out the Development generally in accordance with the: (a) EIS; (b) RTS; (c) site layout plans and drawings in the EIS (see Appendix A); (d) MOD 1; (e) MOD 2 (f) MOD 3 (g) MOD 4 and (h) MOD 5 (i) conditions of this consent	G	Statement	Compliant	2021 Update: Reviewed during 2021 IEA Auditor noted NIL breaches
B7B	Notwithstanding Condition B7A, the ACS Management works must not extend beyond 30 November 2019	D	This phase has been completed	Compliant	Re MOD6 Submission: A further extension to the project end date (March 2020) was approved by DPE The Conversion to Terminal project concluded on <u>31 March 2020</u> .

D9	<p>The Applicant shall, to the satisfaction of the Secretary:</p> <p>(e) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • SEE and MOD 1; • MOD 2 and its accompanying documents; • MOD 3 and its accompanying documents • MOD 4 and its accompanying documents • MOD 5 and its accompanying documents • current statutory approvals for the Development; • approved strategies plans or programs; <p>a summary of the monitoring results of the Development, which have been reported in accordance with the various</p>	D	This phase has been completed	Compliant	<p>Refer to previous SSD5544 D9 comments made</p> <p>2021 IEA Auditor noted NIL breaches</p>
----	---	---	-------------------------------	-----------	--

SSD 5544 MOD6 21 January 2020 - Extension of ACS Management Works Period

SCHEDULE B – ADMINISTRATIVE CONDITIONS					
	Conditions	Applicable Phase: Conversion (C) Demolition Terminal Operations (D/T) or General (applies to all phases) (G)	Activity Status: Completed Active/ongoing Inactive	Compliance Status Compliant Not Compliant Not Triggered	Comments/Actions
B2	<p>The Applicant shall carry out the Development generally in accordance with the:</p> <p>(a) EIS; (b) RTS; (c) site layout plans and drawings in the EIS (see Appendix A); (d) MOD 1; (e) MOD 2 (f) MOD 3 (g) MOD 4 (h) MOD 5 and (i) MOD 6 (i) conditions of this consent</p>	D	This phase has been completed	Compliant	<p>2021 Comments:</p> <p>Both the capping of the ASC Containment Cell and the demolition works <u>concluded</u> as of 31 March 2020</p> <p>ACS CC Site assessment reviewed during 2021 IEA</p>

B7B	Notwithstanding Condition B7A, the ACS Management works must not extend beyond 31 March 2020	D	This phase has been completed	Compliant	Auditor noted NIL breaches The Conversion to Terminal project concluded on <u>31 March 2020</u> .
D9	<p>The Applicant shall, to the satisfaction of the Secretary:</p> <p>(f) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> • the EIS; • SEE and MOD 1; • MOD 2 and its accompanying documents; • MOD 3 and its accompanying documents • MOD 4 and its accompanying documents • MOD 5 and its accompanying documents • MOD 6 and its accompanying documents • current statutory approvals for the Development; • approved strategies plans or programs; • a summary of the monitoring results of the Development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, updated on a quarterly basis; • copies of any annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(g) keep this information up to date,</p> <p>Note: This requirement does not require any confidential info to be made available to the public</p>	D	This phase has been completed	Compliant All DPE Approved EMP's and Management Plans available on Ampol Public website	<p>2021 Update:</p> <p>Both the capping of the ASC Containment Cell and the demolition works have <u>concluded</u> as of 31 March 2020</p> <p>Refer to comments made above and previous SSD5544 D9 comments made</p> <p>2021 IEA Auditor noted NIL breaches</p>

APPENDIX 3 Kurnell Site Maps

Figure A – Kurnell Regional Context and SSD5544 Development Consent Boundaries



Figure B - Plot Plan A1-18588 titled "Environment Protection Licence Identification Points", Version 7, dated 14 February 2020

