

**CONSTRUCTION OF
BULK LIQUIDS Berth No.2
Port Botany**



**INDEPENDENT ANNUAL
ENVIRONMENTAL AUDIT REPORT**

FOR THE OPERATION OF BULK LIQUIDS BERTH No 2

19 NOVEMBER 2014

Dickson Environmental Consulting and Audit Pty Ltd
Conducted by Julie Dickson
M Env Mgmt, CEnvP,

Exemplar Global Certified Lead Environmental Auditor
Signed
Certificate Number: 13573



Date: 17/12/2014



DICKSON ENVIRONMENTAL CONSULTING & AUDIT

High Quality, Tailored Solutions For Management Systems.

Document History

Revision	Revision	Date
A	Initial Draft for comment	29/11/2014
B	Final Draft	12/12/2014
0	Final for issue to client and DP&E (incorporates closure of IOC)	17/12/2014

TABLE OF CONTENTS

1	INTRODUCTION.....	1
1.1	<i>Project Background</i>	<i>1</i>
1.1.1	Location	1
1.1.2	Requirement for this audit	2
1.1.3	Operational Activities	2
1.2	<i>Purpose and Scope.....</i>	<i>3</i>
1.3	<i>Methodology</i>	<i>3</i>
2	AUDIT OUTCOMES	4
2.1	<i>Table 1 – Overall Audit Findings.....</i>	<i>4</i>
2.2	<i>Compliance to Ministers Conditions of Approval and Statement of Commitments.....</i>	<i>4</i>
2.3	<i>Assessment of the effectiveness of environmental mitigation measures</i>	<i>5</i>
2.4	<i>Table 2 –Photographs – BLB2 Site Inspection</i>	<i>7</i>
2.5	<i>Glossary of Terms in relation to findings.....</i>	<i>9</i>
3	APPENDIX 1 – Audit checklists	9

1 INTRODUCTION

1.1 Project Background

The development of the Bulk Liquids Berth No. 2 (BLB2) commenced in mid-2011 and was designed to ensure New South Wales has adequate berth capacity to satisfy existing and future forecast demands for the import and export of bulk liquids including chemical, petroleum and gas products.

The Bulk Liquids Berth 2 (BLB2) is the second purpose-built bulk liquids facility located at Port Botany, adjacent to the BLB1. It is a common user facility controlled by the Port Botany Operations Pty Limited (operating as NSW Ports).

Vopak Terminals Pty Ltd submitted a Major Project Application (07_0061) under Part 3A of the Environmental Planning and Assessment Act 1979 (now repealed) for the construction and operation of the BLB2 facility at Port Botany, on behalf of Sydney Ports Corporation (SPC). On 20 March 2008 planning approval was granted for the project. NSW Ports assumed control of the facility on 1 June 2013 as part of the 99 year lease of Port Botany and is responsible for overall compliance with the Conditions of Approval.

1.1.1 Location

The site of BLB2 is located on the west side of privately owned Fishburn Road, adjacent to the boundary of Vopak Site B and the Elgas Caverns, in the suburb of Port Botany (see Figure 1). BLB2 is located adjacent to the existing Bulk Liquids Berth (BLB1) at the south-western end of Brotherson Dock approximately 11 km south of the Sydney CBD. Port Botany has been substantially developed for industrial purposes relating to shipping and port activities.

Figure 1 – Project Location



1.1.2 Requirement for this audit

Condition 4.1 (d) of the MCoA requires that a program for independent environmental auditing is to be implemented at least annually or as otherwise agreed by the Director General in accordance with ISO 19011:2002 (now 2012) Guidelines for Management Systems Auditing.

According to project's Compliance Tracking Program, this independent environmental audit is required to be undertaken during the first year of operations, with the frequency of subsequent audits to be determined with DP&I. The Environmental Audit Report will be made available on the NSW Ports' website.

1.1.3 Operational Activities

The main products handled at the BLB are refined fuels, gases and chemicals. The BLB2 comprises a concrete deck on a steel piled pier berth adjacent to the existing BLB1; associated infrastructure such as marine loading arms, fire-fighting equipment, onshore support facilities and pipelines from existing user sites to the new berth. The open access, multi user berth operates on a 24 hour/ 7 day per week basis. BLB2 has been designed to accommodate 120,000 dead weight tonne vessels to a maximum of 270m length overall. BLB2 also allows for the servicing of ships at the berth. The following companies have established bulk liquids/gas storage terminals at the Port and are current tenants of NSW Ports at the BLB2:

- Vopak Terminals Australia.
- Terminals Pty Ltd;

Environmental Protection Licenses (EPLs) issued by the EPA are held by each of the operating users and it is the responsibility of those users to ensure that they meet the conditions of those licenses. EPLs previously held by the users were updated and the scheduled activity "Shipping in Bulk" has been added to the Licence through Licence variations.

The operation of the BLB2 consists of the following key relevant components:

- A central working platform and working area, with berthing face (including bollards and fenders) and pipe manifold / marine loading arm arrangements;
- Adjacent berthing dolphins on each side of the working platform designed to accommodate the maximum design length vessel;
- Two mooring dolphins on each side of the working platform (four in total);
- Walkways (catwalks) connecting the dolphins and working platform;
- An access bridge structure connecting the working platform with the shore, providing vehicle access and pipeline support structures; and
- Support infrastructure including fire control facilities (pumps, foam/water monitors and associated tanks), amenities buildings and services such as water, sewer, electrical and communications; and
- Berth infrastructure, including fire-fighting monitors and operator shelter.
- Pipelines to user facilities including support and access structures such as pipe racks and culverts.

1.2 Purpose and Scope

The purpose of the audit was to assess compliance with project environmental criteria in accordance with the scope below:

- Assessment of compliance with the Conditions of Approval and Statement of Commitments;
- Assessment of the effectiveness environmental mitigation measures including performance against commitments made in the Bulk Liquid Berth 2 Operational Environmental Management Plan (OEMP).

The scope of the audit included the operations of the facility and any ongoing requirements relating to the Conditions of Approval.

1.3 Methodology

The audit methodology included a physical site inspection, interviews with key NSW Ports and site personnel and a review of relevant documentation and records. The audit was conducted at the BLB2 operational site on 19 November 2014 during a chemicals (lube oil) transfer operation from ship (Stolt Jasmine) to shore (Terminals pipework). The audit day was chosen specifically to coincide with a ship transfer operation. Photos were taken during the site inspection and these are presented in Section 2.2 – Table 2 of this report. Minor maintenance works (painting) by subcontractors was also observed on the day of the audit. Additional assessment of documentation and records was also conducted off-site.

An audit checklist incorporating all relevant Conditions of Approval (including modifications) and commitments made in the Statement of Commitments (SoC) was used as the primary audit tool. Section 3.2 of the OEMP (Environmental Impacts and Control Measures) provided the basis for the assessment of effectiveness of environmental mitigation measures.

2 AUDIT OUTCOMES

Under the Condition 4.1 (d) of the Minister's Conditions of Approval for the Construction of the Bulk Liquids Berth No 2 project, in accordance with ISO19011: 2002 (now 2012).

Overall, the audit found that Operation of the BLB2 Project has demonstrated a high level of compliance to the Conditions of Approval and the Statement of Commitments and have implemented appropriate environmental mitigation measures in accordance with the OEMP.

As noted in Table 1 below, no non-compliances have been raised, one (1) technical IOC has been raised and no Opportunities for Improvement have been raised.

2.1 Table 1 – Overall Audit Findings

Type* & No.	Organisation	Finding	Report / checklist reference
IOC #1	NSW Ports	<p>The Hazard Auditor had not been formally approved by DP&E at the time of the Hazard Audit due to delays within the department. However, had the audit been delayed until after 5 Dec, NSW Ports would have been in non-compliance with condition 3.3. This finding is considered to be a technical Issue of Concern.</p> <p>Following completion of this audit, a formal letter approving the Independent Hazard Auditor dated 3/12/2014 was received by NSW Ports.</p> <p>Status - Closed</p>	MCoA Condition 1.7

2.2 Compliance to Ministers Conditions of Approval and Statement of Commitments

The outcome of the audit was positive in relation to the level of compliance to the Conditions of Approval and Statement of Commitments, with an effective compliance tracking process in place.

The audit found that relevant conditions had been fully complied with by the Proponent / Principal (NSW Ports). For detailed findings, refer to Appendix 1 - Audit Checklist – Part 1.

Whilst a high level of compliance was noted, one technical Issue of Concern (IOCs) was identified. The IOC related to the fact that the Hazard Auditor had not been formally approved by DP&E at the time of the Hazard Audit. This issue is considered as a technical Issue of Concern because had the audit been delayed until after 5 Dec, NSW Ports would have been in non-compliance with condition 3.3. The decision was therefore made by NSW Ports to proceed with the Hazard Audit prior to receiving formal approval. This issue was resolved prior to issue of this final report.

2.3 Assessment of the effectiveness of environmental mitigation measures

At the time of the audit, the berth was operational, and lube oils were being transferred from the Stolt Jasmine by Terminals (users) operators. The effectiveness of environmental mitigation measures were assessed through observation of operations, inspection of the facilities for spill prevention and preparedness and overall housekeeping, and a review of key operational documentation. Actual performance was also assessed against the commitments made in Section 3.2 of the Operational Environmental Management Plan (OEMP). Interviews were also held with personnel to determine their levels of training and awareness of environmental issues. The specific mitigation measures assessed are provided in more detail below and in Table 2 – Photographs.

Stormwater and Water Quality

- Spill containment bunded tank installed and operational (kept empty)
- There have been no spills, and the spill containment tanks has not been used to date
- The working platform is bunded and closed off during transfer operations (verified through observation of electronic systems monitoring through the ORION control system.
- CCT cameras and electronic monitoring of transfer systems are monitored at all times from the operations building during liquid transfer
- Operators are stationed in the near vicinity of the transfer point to respond to any incidents and initiate isolation of the transfer if required
- Hoses are pressure tested annually and tested with nitrogen prior to each use – using appropriately rated hoses
- Manual shut down valves are located at each end of the flexible hoses
- Pipes are emptied and are liquid free between transfers
- Slop buckets are used over a bund/tray to prevent minor spills during sampling and testing
- Spill trays have valves which are kept in the closed position during transfers and checked on completion. Spill trays are required to be clean prior to leaving the wharf and this is checked by NSW Ports Officers.

Emergency Response - spill prevention and preparedness

- Emergency Response Plans in place for facility and by Users
- Spill response kits are available at various locations on the site
- An oil boom facility is available to be deployed from Brotherson dock in case of a major spill to water
- An emergency exercise was performed on 20 January 2014 as required under CoA 4.3(a) as part of the Post- Start-Up Compliance Report
- Emergency preparedness is included in the training and competency program for the BLB

Waste and litter management.

- Minimal waste is generated on site. Domestic levels of waste are generated in the site offices and is removed by approved waste contractors (Remondis). Records are retained and recent invoices were sighted
- Minimal litter was observed on the site

Operational Controls / housekeeping

- A number of checklists are in place to ensure appropriate checks are made before, during and after transfers including Pre-Arrival Checklist, Ship to Shore Checklists Wharf Clearance Certificate (completed by users – declaration that wharf has been cleaned up prior to departure) and Departure checklist (checks by NSW Ports that user has cleaned up)
- A work permit system is in place primarily for safety purposes, however closure of the permit requires a declaration of no contamination following completion of the work in the permit.
- A suite of documents is in place for every ship that transfers product – The NSW Ports Ship's documents includes a cover sheet with name of Officer and shift times, product, work permits required, date of arrival and departure. The file also includes a printout from the SHIPS system which provides information about the ship, booked in details, work permit details, product information, Hazchem ratings etc
- Contractors are required to remove all rubbish from site and to ensure they have MSDSs for any substances brought onto site
- Observations and inspections are undertaken to proactively identify hazards including environmental hazards.
- All incidents are required to be reported through the STEMS electronic reporting system. There have been no reported incidents to date since the commencement of operations.
- Job Safety Analyses (JSAs) and Safe Work Method Statements are implemented to minimise safety and environmental risks and hazards
- Regular maintenance inspections are carried out on critical equipment (eg – Spill containment pumps) Annual and quarterly inspection reports were sighted for the Marlow and Bedal Pumps by Halliday Engineering – 30/09/14 (Annual) and 11/07/14 (quarterly).
- Regular visual inspections of the wharf area, and whole site are undertaken on foot at least 3 times per day as well as continuous CCTV monitoring from the control room with various CCTV aspects over the BLB2 site to ensure there is no leakage or spillage of materials on the ground. The site inspection conducted during the audit did not identify any evidence of spills.
- Any abnormalities noted during inspections or on CCTV are investigated and acted upon immediately, and if serious they are reported to the BLB Manager and documented in the site log book.
- The BLB users also conduct visual inspections on foot during their shipping operations by walking the length of the pipelines from the wharf and along the pipeline corridors through the BLB2 site.
- Site housekeeping was noted to be maintained at a high level. Minimal litter was observed.

Training and Awareness:

- Intensive training is conducted on the Operations Manual and other key documents. The NSW Training Manual dated 06/06/2014 includes Fire and Emergence systems (Section 3 and Pollution (Section 7). Each Port Officer is required to complete the student assessment book (examples sighted).

2.4 Table 2 –Photographs – BLB2 Site Inspection

Photographs – BLB Operations Site Inspection Wed 19 Nov 2014



Photo: 1: View of the Operations building and car park



Photo 2:View towards the Bulk Loading Berth with the Stolt Jasmine alongside unloading lube oil



Photo: 3:Entry to site – Signage as required by the Conditions of Approval and security measures



Photo: 4: Rainwater tanks for non-potable use in the operations building



Photo: 5: Berth spill containment tank (empty) – fully bunded. Would be used in case of spill at the berth and on site

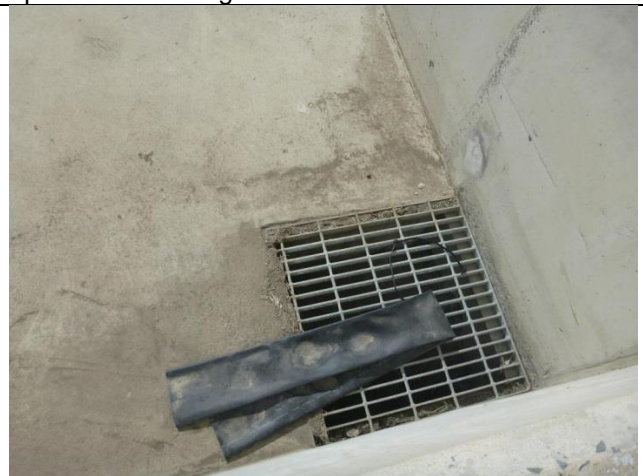


Photo: 6: Sump within the spill containment tank bund

Photographs – BLB Operations Site Inspection Wed 19 Nov 2014



Photo: 7: One of several spill response kits located on site. This kit is near the operations building



Photo: 8: Spill Containment Pump (north) on working platform. Would be used to pump spilled liquids back to the spill containment tank on shore. (regularly tested)



Photo: 9: Liquids spilt on the deck would flow to this low point – would be pumped back to the spill containment tank on shore

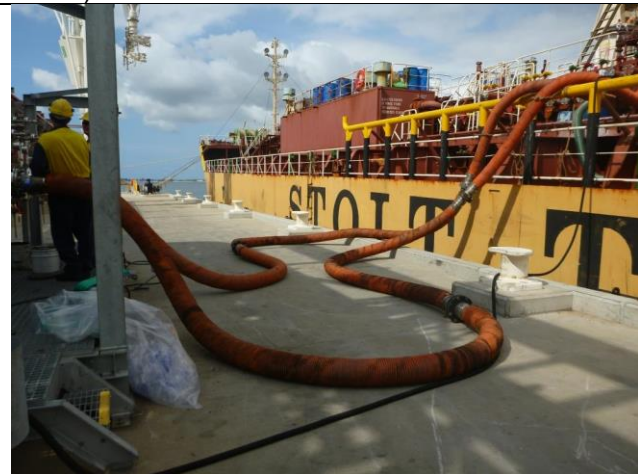


Photo: 10: Transfer operations using hoses tested with nitrogen prior to each use. New gaskets are used for each transfer. CCTV cameras are monitored during use, Operators required to be in attendance at all times during transfer.



Photo: 11: View of access roadway from shore to working platform



Photo: 12: Users workshops with spill containers on standby

2.5 Glossary of Terms in relation to findings

- **Compliant (C)** ✓: Complies with all requirements of the condition(s)
- **Opportunity for Improvement (OFI)** ◆: An opportunity identified during the audit that could assist in the improvement of environmental performance on the project.
- **Issue of Concern (IOC)** ☒: A situation observed during the audit that is not considered as good environmental practice and requires corrective action. May be considered as a minor non-compliance and will be followed up at subsequent audits.
- **Non-compliance (NC)** ☒: Does not fully comply with all requirements of the condition or does not meet appropriate environmental management standards. Non-compliances will require verification of adequate corrective action by the independent auditor within 6 weeks of the audit. Where the non-compliance is based on site observations, a return site visit will be required.
- **Not Applicable:** There were either no compliance issues related to the condition, is a future required action or was not applicable at the time of the audit.

3 APPENDIX 1 – Audit checklists

List of contents of appendix:

- 3.1 Part 1 - Minister's Conditions of Approval (MCoA)
- 3.2 Part 2 - Statement of Commitments (SoC).

Audit Checklist – for the Operation of the Bulk Liquids Berth No 2, Port Botany

Part 1 - Ministers Conditions of Approval (MCoA) - Operations

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
1 ADMINISTRATIVE CONDITIONS						
Terms of Approval						
1.1	NSW Ports	The Proponent shall carry out the project generally in accordance with the a) Major Projects Application 07_0061; b) Bulk Liquids Berth No. 2 – Port Botany: Environmental Assessment dated November 2007 and prepared by Sinclair Knight Merz Ltd; c) additional information provided by Sinclair Knight Merz Pty Ltd to the Department titled Failure Frequency of the Port Botany Bulk Liquids Berth 2 Marine Loading Arms (letter dated 18 December 2007); d) Response to Submissions Report prepared by Sinclair Knight Merz Pty Ltd and dated 26 February 2008; and e) the conditions of this approval	The project is progressing in accordance with the required documents. Terminals operations on BLB2 commenced 4/12/13. Vopak operations on BLB2 commenced 9/1/14. The audit did not identify any areas of non-compliance Status: Ongoing	C		
1.2	NSW Ports	In the event of an inconsistency between: a) The conditions of the approval and any document listed from condition 1.1a) to 1.1d) inclusive, the conditions of the approval shall prevail to the extent of the inconsistency b) Any document listed from condition 1.1a) to 1.1d) inclusive, and any other document listed from condition 1.1a) to 1.1d) inclusive, the most recent document shall prevail to the extent of the inconsistency c)	Noted Status: Ongoing	C		
1.3	NSW Ports	The Proponent shall comply with any reasonable requirement(s) of the Director- General arising from the Department's assessment of: a) Any reports, plans or correspondence that are submitted in accordance with this approval; and	Noted Since the last independent audit, there have been no additional requests for reports, plans or correspondence requesting actions. A Pre-Start Up	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
		b) The implementation of any actions or measures contained in these reports, plans or correspondence	Compliance Report was submitted to DP&I on 16/10/13 and approved 29/11/13, required under CoA 4.2 Status: Ongoing			
Limits of Approval						
1.4	SPC/NSW Ports	This approval shall lapse after five years after the date on which it is granted, unless the works the subject of this approval are physically commenced on or before that time	Noted. The works commenced in September 2011 Status: Complete	C		
1.5	NSW Ports / Users	The export of Liquefied Petroleum Gas (LPG) is permitted, provided that a report detailing the reverse flow prevention arrangements for LPG export is firstly submitted to the satisfaction of the Director-General.	As noted in the last construction phase audit, there have been tenants/operators committed to the import and export of LPG. There has been no change since the last audit. Status: Ongoing			NA
Statutory Requirements						
1.6	NSW Ports /Users	The proponent shall ensure that all Licences, permits and approvals are obtained and kept up-to-date as required throughout the life of the development. No condition of this approval removes the obligation for the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on site at all times during the project.	Environmental Protection Licences (EPLs) are held by Users- Vopak and Terminals. The users had existing EPLs, and the scope of these have been revised by the EPA. NSW Ports provided advice to EPA on conditions, but do not hold a licence. Sighted Vopak variation of Licence no. 6007 dated 22/07/2014 to include Shipping in Bulk (5000000 t) as a scheduled activity. Sighted Terminals variation of Licence No. 1048 dated 30/07/2014 to include Shipping in Bulk (5000000 t) as a scheduled activity (100000 – 500000 t) Status: Ongoing	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
Compliance						
1.7	NSW Ports / Users	The Proponent shall ensure that employees, contractors and subcontractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.	OEMP provides an overview of the conditions of approval and copies have been provided to the users Vopak and Terminals. Interviews with the users Terminal Managers confirmed the implementation of the requirements of the CoA is through the OEMP / Operations Manual. A Compliance Tracking Program has been prepared and approved by the D-G, which outlines how compliance issues will be managed and by whom. A training and induction program is in place at the BLB terminal for all employees and contractors and they are made aware of the key requirements of the approval Status: Ongoing	C		
1.8	NSW Ports	The Proponent shall be responsible for environmental impacts resulting from the actions of all persons on site, including contractors, subcontractors and visitors.	Noted Status: Ongoing	C		
Utilities and Services						
1.9	Constructor / NSW Ports	Prior to commencement of construction, the Proponent shall identify (including, but not limited to the position and level of service) all public utility services on the site, roadway, footpath, public reserve or any public areas that are associated with, and / or adjacent to the site, and/or likely to be affected by the construction and operation of the project.	This was assessed at the previous (construction phase) audit and deemed compliant. Status: Completed	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
1.10	NSW Ports	The Proponent shall consult with the relevant utility provider(s) for those services identified under condition 1.9 and make arrangements to adjust and/or relocate services as required. The Proponent shall bear the full cost associated with providing utilities and services to the site, and restoring any public utilities that may be damaged during the proposed works.	There have been no additional requirements to consult since the last (construction) audit Status: Ongoing	C		
1.11	NSW Ports	Prior to the commencement of construction works that may affect services/utilities; the Proponent shall provide documentary evidence to the Director-General that the requirements of the relevant utility provider(s) have been met.	Pre- construction requirement. All works have now been completed. Previously deemed compliant Status: Completed, Closed	C		
2 SPECIFIC ENVIRONMENTAL CONDITIONS						
Hazards and Risk						
2.1 Pre-construction – Note – most preconstruction conditions removed as not relevant to the scope of this audit						
2.1(b)	NSW Ports	Fire Safety Study (Pre-construction) The Users' designers are to review the Fire Safety Study (re CoA 2.1 a) as part of the design process and amend it based on the proposed gas and liquid transfer and infrastructure installed. The updated FSS shall then be submitted to Sydney Ports for review prior to the finalisation of the detailed design works for the berth. The Users are to confirm the that recommended safety features have been incorporated for the Marine Loading Arms during design of the pipeline facilities. The updated FSS is to be submitted to the DG for approval	NSW Ports received a letter from NSW Fire and Rescue on 27/2/14 regarding the revised FSS that was submitted to NSW Fire and Rescue on 5/7/13 seeking clarification on a number of issues and an assessment of the fire hazard risk associated with the new Terminals Changeover/Jump Station adjacent to BLB1. Terminals undertook the risk assessment and NSW Ports submitted the clarification and Risk Assessment to NSW Fire and Rescue on 6/5/14. NSW Fire and Rescue acknowledged receipt of the information and advised that due to prioritisation of issues, a formal response may be delayed. Status: In progress	C		
2.2	NSW Ports	Pre-Commissioning Two months prior to the commencement of project commissioning, or within such period otherwise agreed by the Director-General, the Proponent shall develop and implement the following plans and systems and submit them for approval to the Director-General:	See below			

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
2.2 (a)	NSW Ports /	<p>Emergency Plan A comprehensive Emergency Plan and detailed emergency procedures for the project prepared in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 1 - Industry Emergency Planning Guidelines, and submit them for the approval of the Director-General.</p>	<p>Yes- Letter dated 16/10/13 from DP&I states that the plan has been reviewed and considers that it satisfactorily addressed the requirements of this condition. Approved by the Director General. Operations commenced 5/12/13.</p> <p>Status: Complete</p>	C		
2.2 (b)	NSW Ports /	<p>Safety Management System Two months prior to the commencement of project commissioning, or within such period otherwise agreed by the Director-General, the Proponent shall develop and implement 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 Director-General upon request. The Safety Management System shall be developed in accordance with the Department of Planning's Hazardous Industry Planning Advisory Paper No. 9 - Safety Management.</p>	<p>A SMS for BLB2 (incorporates BLB1 and BLB2) was developed in August 2013 for implementation from 1 November 2013. The SMS is available electronically at the BLB2 site and is also for inspection by the D-G upon request. An SMS Manual version 1.0 with effective date of 1/11/2013 was sighted and reviewed, and is a component of the overall SMS at BLB. The SMS documentation was briefly reviewed and it was confirmed that the SMS specifies safety procedures, policies, (including mechanisms for ensuring adherence to procedures) and that records were available electronically and in hard copy.</p> <p>The SMS was submitted to DP&I for approval 30/10/13. Comments on the SMS were received from DP&I by email on 6/11/13. A revised SMS was submitted to DP&I on 7/11/13. Awaiting final DP&I approval. At the time of the audit, formal approval had not been received from Planning and Environment.</p> <p>Status: ongoing</p>	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
Air Quality Impacts						
Odour						
2.3	NSW Ports/Users	The Proponent shall not permit any offensive odour, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i> , to be emitted beyond the boundary of the site unless as otherwise permitted by an Environment Protection Licence.	Noted Odour is not a significant issue on the project. Odour was not identified as significant during the site inspections conducted during the audit. There have been no odour complaints. Status: Ongoing	C		
Dust Emissions						
2.4	Users	The Proponent shall undertake the project in a manner that minimises or prevents dust emissions from the site. Including wind-blown and traffic generated dust. Should visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures, including cessation of relevant works, as appropriate, such that emissions of visible dust cease.	This condition primarily applies to the construction phase as there are minimal to no dust sources at the built facility. The site inspection did not identify any dust issues at the site. Status: Closed	C		
Noise Impacts						
Operation Noise Impacts						
2.9	NSW Ports/	The Proponent shall minimise noise emissions from plant and equipment operated on the site by installing and maintaining, wherever practicable, efficient silencers and low-noise mufflers (residential standard).	Minimal plant and equipment is operated at the BLB. The most significant noise source is the ships in port, and the BLB have no control over this issue. Status: Ongoing	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
2.10	NSW Ports/	The Proponent shall design, operate and maintain the project to ensure that the noise contributions from the project do not exceed the maximum allowable noise contributions specified in Table 1, at those locations and during those periods indicated. The maximum allowable noise contributions apply under: a) meteorological condition of wind speeds up to 3 ms-1 (measured at 10 metres above ground level); or b) temperature inversion conditions up to 3oC per 100 metres and wind speeds up to 2ms-1 (measured at 10 metres above ground level).	A noise audit/ Ship Noise Monitoring Report was conducted by SLR to determine compliance to this condition. Measurements were conducted on 27 February 2014 on the wharf adjacent to BLB2 during the Bulk Liquids operations (ship pumping to shore/shore pumping to ship), where the noise environment is dominated by the ship bulk liquids operations. Based on these near field measurements the various source sound power levels would be determined and the SoundPlan model SLR developed for the Port Botany area used to calculate noise levels at the 4 residential receivers specified in the Approval. This proposed methodology was accepted by the EPA and P&I in their approval letter dated 18 February 2014, used in this assessment. The monitoring report concluded that “Noise levels predicted at the four receiver locations complied with the noise limits specified in the Approval, for both operation of BLB'2 as well as BLB1 and BLB2 together. Status: Closed	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome																			
				* See footer for key																			
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA																	
Table 1 - Operational Noise Limits for Representative Residential Receivers <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th>Day/Evening/Night Bulk Liquids Berth No. 2 only</th> <th>Day/Evening/Night Bulk Liquids Berth 1 and 2</th> </tr> <tr> <th>L_{Aeq}(15 minute) (dB(A))</th> <th>L_{Aeq}(15 minute) (dB(A))</th> </tr> </thead> <tbody> <tr> <td>Botany Road, north of the Golf Club (Location 4)</td> <td>35</td> <td>38</td> </tr> <tr> <td>Australia Avenue (Location 5)</td> <td>35</td> <td>38</td> </tr> <tr> <td>Wassel Street/Military Road (Location 6)</td> <td>35</td> <td>38</td> </tr> <tr> <td>Elaroo Avenue (Location A)</td> <td>35</td> <td>38</td> </tr> </tbody> </table>				Location	Day/Evening/Night Bulk Liquids Berth No. 2 only	Day/Evening/Night Bulk Liquids Berth 1 and 2	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	Botany Road, north of the Golf Club (Location 4)	35	38	Australia Avenue (Location 5)	35	38	Wassel Street/Military Road (Location 6)	35	38	Elaroo Avenue (Location A)	35	38			
Location	Day/Evening/Night Bulk Liquids Berth No. 2 only	Day/Evening/Night Bulk Liquids Berth 1 and 2																					
	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))																					
Botany Road, north of the Golf Club (Location 4)	35	38																					
Australia Avenue (Location 5)	35	38																					
Wassel Street/Military Road (Location 6)	35	38																					
Elaroo Avenue (Location A)	35	38																					
2.11		<p>For the purpose of assessment of noise contributions specified under condition 2.10 of this approval, noise from the project shall be:</p> <p>a) Measured at the most affected point on or within the residential boundary to determine compliance with the L_{Aeq}(15 minute) and L_{Aeq}(night) noise limits outlined in condition 2.10; and</p> <p>b) subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable.</p> <p>Notwithstanding, should direct measurement of noise from the premises be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the DECC (refer to Section 11 of the <i>New South Wales Industrial Noise Policy</i> (EPA, 2000)). Details of such an alternative noise assessment method accepted by the DECC shall be submitted to the Director-General prior to the implementation of the assessment method.</p>	<p>An alternative method was proposed and accepted by the EPA and P&I in their approval letter dated 18 February 2014, which consisted of reference noise measurement carried out in close proximity to the Pacific Rainbow vessel discharging bulk liquids at the BLB'2 facility. The reference noise level was then used to predict noise levels at the four receiver locations specified in the Approval.</p> <p>Status: Closed</p>	C																			
Soil and Water Impacts																							
2.12	SPC/NSW Ports	The proponent shall ensure that all stormwater on the working platform is directed to a stormwater treatment unit/pollutant trap capable of removing gross pollutants, oil, grease and sediments, prior to it being discharged to Botany Bay.	<p>Completed –installed and operating - Addressed in design.</p> <p>Status: Closed</p>	C																			


MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
2.13	NSW Ports	The Proponent shall ensure that all oil and grease or other pollutants in the wastewater storage tank and the stormwater treatment unit is regularly collected and disposed of off-site at a waste management facility lawfully permitted to accept this waste.	At the time of the audit, the wastewater (sewage) tanks had never been used nor cleaned out. The stormwater GPT and oily water separator was due to be cleaned within a few weeks. Subsequent to the audit, the clean out had occurred, however the receipts were not yet available from the supplier Status: Ongoing	C		
3	NSW Ports?	ENVIRONMENTAL MONITORING AND AUDITING				
Noise Audit						
3.1	NSW Ports	Within 90 days of commencement of operations associated with the project and during a period in which the project is operating under normal operating conditions, the Proponent shall undertake a noise audit to detail the noise emission performance of the facility. This audit shall meet the requirements of the DECC, and shall include, but not necessarily be limited to: a) noise monitoring, consistent with the guidelines provided in <i>New South Wales Industrial Noise Policy</i> (EPA, 2000) to assess compliance with the criteria specified in Table 1 of this approval; b) methodologies for noise monitoring; c) location(s) of noise monitoring; d) frequency of noise monitoring; e) identification of monitoring sites at which pre-and post-project levels can be ascertained; and f) provision of details of any complaints received relating to noise generated by the project, and action taken to respond to those complaints.	Noise audit was conducted on 27/2/14 by SLR noise consultants within the required 90 day period since commencement of operations and included the necessary details as required by this condition. Also refer to condition 2.9, 2.10 and 2.11 The Noise audit was undertaken using an alternative method was proposed and accepted by the EPA and P&I in their approval letter dated 18 February 2014. There have been no noise complaints relating to the operation of the facility to date. Status: Completed	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
3.2	NSW Ports	Within 28 days of conducting the noise audit referred to under condition 3.1 of this approval, the Proponent shall provide the Director-General and DECC with a copy of the report. If the noise audit identifies any non-compliance with the noise limits imposed under this approval, the Proponent shall detail what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Director-General.	An email was received on 20/05/14 from DP&I requesting clarification on a number of points and an email response was provided. Letter received from DP&E on 4/6/14 that acknowledged that the noise audit report was consistent with Conditions 3.1 and 3.2 and notes no exceedances of the noise limits were recorded and no further action is required at this time. Status: Completed	C		
		Hazard Audit				
3.3	NSW Ports	Twelve months after the commencement of operations of the project or within such period otherwise agreed by the Director-General, the Proponent shall carry out a comprehensive Hazard Audit of the project and within one month of its completion submit the audit report to the Director General. The audit shall be carried out at the Proponent's expense by a duly qualified independent person or team approved by the Director General prior to commencement of the audit. Further audits shall be carried out every three years or as determined by the Director General and a report of each audit shall be submitted to the Director General within one month of each audit completion date. All hazard audits shall be carried out in accordance with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No.5 - Hazard Audit Guidelines</i> . Each audit shall include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. Each audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, justification must be included.	Hazard audit was conducted the week prior to this independent audit which is within the 12 month requirement (operations commenced 5/12/2013). However, formal approval of the auditor had not been received from DP&E at the time of the audit. NSW Ports provided a letter to DP&E on 27/10/14 nominating Dr Raghu Raman to conduct the hazard audit and provided an attached CV for DP&E approval. Email correspondence from DP&E was received on 3/11/14 requesting clarification on a number of matters. An email response was provided on 4/11/14. NSW Ports are awaiting official approval of Auditor from DP&E. Audit was undertaken on 10 and 11 November 2014. It appears that NSW Ports have undertaken the required actions to satisfy this condition of approval, however the formal approval of the auditor had not been provided by Department of Planning and Environment prior to commencement of the Hazard Audit.		IOC	

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
			<p>Should the Hazard audit have been delayed whilst awaiting formal approval, NSW Ports would have been in non-compliance with this condition in relation to the timing of the Hazard audit. The decision was made to go ahead with the audit in expectation of a formal approval in the near future rather than delay beyond the 12 month requirement. A formal letter approving the Hazard Auditor dated 3/12/2014 was received by NSW Ports prior to finalisation of this audit report. The IOC is now closed (see executive summary and findings)</p> <p>Status: In progress</p>			
4 COMPLIANCE MONITORING AND TRACKING						
Compliance Tracking Program						
4.1	NSW Ports	<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The program shall be submitted to the Director-General for approval prior to the commencement of construction. The program shall relate to both construction and operational stages of the project and shall include, but not necessarily be limited to;</p> <ol style="list-style-type: none"> provisions for periodic review of the compliance status of the project against the requirements of this approval; provision for periodic reporting of compliance status to the Director-General;) provisions for specific reporting requirements as required by conditions 4.2 and 4.3; a program for independent environmental auditing at least annually, or as otherwise agreed by the Director-General, in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems 	<p>A Compliance Tracking System has been implemented to track compliance across all phases of the project and satisfies the requirements a) to e). Compliance Tracking program was approved by DP&I June 2011 14/06/11.</p> <p>Compliance tracking continues to be implemented through the preparation of 6 monthly Compliance Tracking Reports (CTR). The May 2014 (final) and November 2014 (in draft) were sighted.</p> <p>The CTR (#6) was submitted to DP&E on 8/5/14 for the period November 2013 - May 2014. It was approved by DP&E on 25/6/14.</p> <p>Parts d) and e) are specifically addressed below:</p>	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
		Auditing; and e. mechanisms for rectifying any non-compliance identified during environmental auditing or review or compliance.	d) This independent audit was conducted within 12 months of commencement of operations in accordance with ISO 19011-2011 – Guidelines for auditing Management Systems (revised standard) e) NSW Ports have systems in place to address any non-compliances as demonstrated in previous audits. No non-compliances were raised at the last audit or this audit. Status: Ongoing			
4.2	NSW Ports	One month prior to the commencement of project operations, the Proponent shall submit to the Director-General a Pre-Startup Compliance Report detailing compliance with conditions 2.1 and 2.2, including: a) dates of study/plan/system submission, approval, commencement of construction and commissioning; b) actions taken or proposed to implement recommendations made in the studies/plans/systems; and c) response to any requirements imposed by the Director-General under condition 1.3.	The Pre-Start Up Compliance Report was prepared by NSW Ports and submitted to DP&I on 16/10/13. The report contained details of NSW Ports and Terminals compliance with the safety and hazard documentation in CoA 2.1 and 2.2. The receipt of the Pre-Start Up Compliance Report was acknowledged in an email from DP&I dated 29/11/13 stating that “the Department has reviewed the report and has no comments on it”. Status: Completed, closed	C		
4.3	NSW Ports	Three months after the commencement of project operations, the Proponent shall submit to the Director-General, a Post-Startup Compliance Report verifying that: a) the Emergency Plan required under condition 2.2a) is in place and effective and that at least one emergency exercise has been conducted; and b) the Safety Management System required under condition 2.2b) has been fully implemented and that records required by that system are being kept on site.	The Post-Start Up Compliance Report was prepared by NSW Ports and submitted to DP&I on 4/3/14. The report contained details of the implementation of the emergency plan and emergency exercises conducted and the implementation of the Safety Management System. Acknowledgement of receipt of the Post-Start Up Compliance Report was received in a letter dated 18/7/14 from Planning and Environment which notes that the report confirms inclusion of certain	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
			components of the Report and that the Department has no further comments. Status: Completed, closed			
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT						
5.1	NSW Ports	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request	The Compliance tracking reports, audit reports, EA and OEMP are made available on the NSW Ports website. http://www.nswportsbotany.com.au/projects-and-planning/bulk-liquids-berth-2/ Status: Ongoing	C		
Complaints Procedure						
5.2	NSW Ports	Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operation): a) A telephone number on which complaints about construction and operational activities at the site may be registered; b) A postal address to which written complaints may be sent; and c) And email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	Yes .Signage with the required information is displayed at the entrance to the facility and the information is also included on the NSW Ports website. See photo below. The complaints response procedure is outlined within the OEMP. The telephone number on the website was tested after-hours (9.00pm at night on day prior to the audit) and the phone number was found to be correct and complaints could be made on that number.	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
			 <p>Status: Ongoing</p>			
5.3	NSW Ports / Users	<p>The Proponent shall record details of all complaints received through the means listed under condition 5.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to;</p> <ol style="list-style-type: none"> the date and time, where relevant, of the complaint; the means by which the complaint was made (telephone, mail or email); details of the complainant that were provided, or if no details were provided, a note to that effect; the nature of the complaint; any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and if no was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken <p>The Complaints Register shall be made available for inspection by the Director-General upon request.</p>	<p>No complaints during operations have been received since commencement of Operations.</p> <p>An Environment Complaints and Incidents Register has been prepared with the columns for each of the fields/criteria specified in this condition.</p> <p>Status: Ongoing</p>	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
6	ENVIRONMENTAL MANAGEMENT					
	Operation Environmental Management Plan					
6.3	NSW Ports / Users	<p>Prior to the commencement of operation of the project, the Proponent shall prepare and submit for the approval of the Director-General an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during the operation of the project. The Plan shall be consistent with the Department's <i>Guideline for the Preparation of Environmental Management Plans</i> (DIPNR 2004), and shall include, but not necessarily be limited to:</p> <p>a) a description of all activities to be undertaken on the site during operation of the project;</p> <p>b) statutory and other obligations that the Proponent is required to fulfil during operation, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</p> <p>c) specific consideration of measures to address any requirements of Council and the DECC during operation;</p> <p>d) details of how the environmental performance of operations will be monitored, and what actions will be taken to address identified adverse environmental impacts;</p> <p>e) a description of the roles and responsibilities for all relevant employees involved in the operation of the project and a program for how these employees will be trained in responsibilities identified in the plan; and</p> <p>f) complaints handling procedures to be applied during operation of the project (conditions 5.2 and condition 5.3 of this approval).</p>	<p>An Operational Environmental Management Plan (OEMP) has been prepared and is made available on the NSW Ports website and can be found at http://www.nswportsbotany.com.au/projects-and-planning/bulk-liquids-berth-2/</p> <p>In a letter dated 25/10/2013 the Director-General grants approval of the OEMP (Version 2 dated October 2013)</p> <p>The OEMP includes the content as required in parts (a) to (f) of the condition.</p> <p>Status: Completed, closed</p>	C		

MCoA No	Auditee NSWP / User	MCoA Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
ENVIRONMENTAL REPORTING						
7 Incident Reporting						
7.1	NSW Ports / Users	The Proponent shall notify the director-General of any incident with actual or potential significant off-site impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Proponent shall provide full written details of the incident to the Director-General within 24 hours of any incident or potential incident occurring. A further detailed report shall be prepared and submitted following investigations of the cause and identification of necessary additional preventive measures. The detailed report is to be submitted to the Director-General no later than 14 days after the incident or potential incident.	An incident register has been created and the requirements of this condition are noted There have been no incidents that have required reporting to the DG or EPA since commencement of operations. Status: Ongoing.	C		

Part 2 - Statement of Commitments

SoC No	Auditee NSWP User	SoC Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
GENERAL						
1	SPC/NSW Ports	Development will be carried out generally as described in <i>Bulk Liquids Berth Terminal No. 2, Port Botany, Environmental Assessment</i> , prepared by Sinclair Knight Merz and dated September 2007.	Refer MCoA Condition 1.1 Status: complete	C		
SERVICES						
2	NSW Ports	Liaison will be undertaken with SPC and the relevant utility and service providers regarding timing of connections to the services, location of services and utilities on the site.	There have been no additional requirements to liaise since the last (construction) audit. Liaison would now be with NSW Ports and the User if required Status: Completed - closed	C		
NOISE MANAGEMENT						
7	NSW Ports Users	Leakages from pipes would be minimised by pressure pipe monitoring, with any required urgent corrective actions, and regular general inspections	Pipes are monitored by the Users. Regular inspections are also undertaken by NSW Ports to ensure no leakages are occurring. Status: Ongoing	C		
Contamination						
9	NSW Ports / Users	Appropriate disposal of any contaminated water or soil in accordance with DECC waste management guidelines	This is addressed in the OEMP. Contractors would be engaged for any removal of liquid waste. No contaminated liquids have been required to be removed from the site to date. Status: Ongoing	C		

SoC No	Auditee NSWP User	SoC Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ◆ ☹ ☒	NA
WATER QUALITY						
11	SPC/ NSW Ports	The working platform and manifold areas would be bunded and would drain to wastewater storage tank. All water collected in the manifold area would be assessed, treated and/or disposed of at an appropriately licensed liquid waste management facility. Water from the working platform would initially be assessed to determine whether it is unpolluted and suitable for release to Botany Bay – or requires disposal at an appropriately licensed liquid waste management facility.	Addressed in design This condition relates to design of the stormwater management system and the infrastructure for this was under construction at the time of the first audit and was complete at the second audit. Facility sighted at audit as part of inspection. Status: Complete	C		
13	SPC	An oil boom facility would be readily available to be deployed rapidly from the nearby Brotherson Dock and brought to BLB2 in the event of a spill.	Present as part of the existing emergency oil spill response team located in Brotherson Dock and is the responsibility of the Port Authority. Visit to facility was undertaken as part of the first environmental audit and was not revisited as part of the operational audit. Status: Ongoing	C		
14	SPC/ NSW Ports / Users	Procedures for spills and leaks including notifications and clean ups would be developed	Emergency response and spill response is addressed in Sections 2.8 and 2.9 of the OEMP. Status: Complete	C		
SECURITY						
19	SPC/ NSW Ports	A review of both the existing security assessment and the approved MSP would be undertaken to ensure appropriate security measures are maintained.	This was assessed at the construction audit and was deemed compliant. This was not reassessed at this operations audit. Status: Complete, closed			NA
20	SPC NSW Ports / Users	Government issued personal identity (ID) cards including Maritime Security Identification [MSIC] cards which require the applicant to have undergone a number of background security checks) would be a pre-requisite for any personnel to gain access to BLB2.	Persons working at BLB are required to be in possession of a valid MSIC or they are required to be under constant supervision by a valid MSIC holder. All visitors must display their MSIC at all times or be accompanied by a person with an MSIC, this is checked upon sign in at the	C		

SoC No	Auditee NSWP User	SoC Requirement	Comments, observations, discussion Evidence, supporting documentation	Audit Outcome		
				* See footer for key		
				C ✓	Finding O IOC NC ♦ ☹ ☒	NA
			BLB office – this requirement is in place for all operational port areas. Status: Ongoing			
WASTE MANAGEMENT						
23	SPC NSW Ports / Users	All waste generated would be removed from the work area as soon as practicable and disposed in accordance with DECC waste management guidelines (<i>Assessment, Classification and Management of Liquid and Non-Liquid Waste 1995</i>).	From an operations perspective, minimal waste is generated, and this would be in the site offices. The waste is removed by Remondis, an an approved contractor as required. Status: Ongoing	C		