



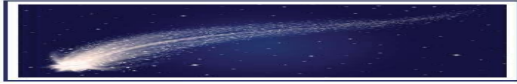
---

STEVE FERMIO ENVIRONMENTAL

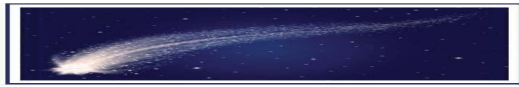
**SYDNEY PORTS CORPORATION**  
**INTERMODAL LOGISTICS CENTRE - ENFIELD**  
**INDEPENDENT ENVIRONMENTAL COMPLIANCE-**  
**AUDIT REPORT**

December 2009

ILC – SF – E – Independent Environmental Compliance Audit Report



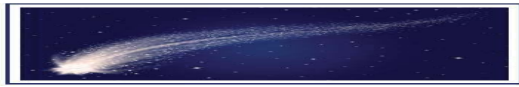
<b>Document Information</b>
Author: Steve Fermio (RABQSA Certificate No 110498)
Issue Date: 18 January 2010
Document No: SFC/SPA001



## Contents

<b>1.0 AUDIT DETAILS .....</b>	<b>4</b>
1.1 Background.....	4
1.2 Audit Objectives & Criteria.....	5
1.3 Audit Scope.....	6
1.5 Meetings .....	7
1.6 Auditor .....	8
<b>2.0 AUDIT FINDINGS .....</b>	<b>8</b>
2.1 Non compliance.....	9
2.2 Opportunities for Improvement.....	9
2.3 Noise and Air Quality Monitoring.....	11
<b>3.0 AUDIT CONCLUSIONS .....</b>	<b>13</b>

### APPENDIX A: Audit Checklist



## 1.0 AUDIT DETAILS

### 1.1 Background

Sydney Ports Corporation (Sydney Ports) is the Proponent for the Intermodal Logistics Centre (ILC) at Enfield.

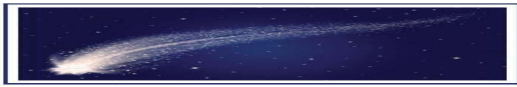
The proposed ILC at Enfield will be used for the transfer and storage of container freight to and from Port Botany, packing and unpacking of containers within the proposed warehouses and storage of empty containers for later re-use or for return to the Port. The development will include:

- an intermodal terminal for the loading and unloading of containers between road and rail and short term storage of containers;
- warehousing for the packing and unpacking of containers and short-term storage of cargo;
- empty container storage facilities for the storage of empty containers for later packing or transfer by rail;
- a light industrial and commercial area complementary to operations at the ILC. The area will also act as an interface to adjacent uses along Cosgrove Road;
- a Community and Ecological Area for ecological enhancement and community opportunities;
- off-site works comprising construction of a road bridge over the existing RailCorp Marshalling Yards for access to Wentworth Street, local road works on Cosgrove Road and the reconstruction of the Norfolk Road and Roberts Road intersection, to manage access/egress of vehicles to/from the ILC Site, and rail connections to the freight rail network.

The ILC site is located at Strathfield South, approximately 15 km by road from the Sydney CBD and 18 km by rail from Port Botany. The site covers an area of around 60 ha extending approximately from the intersection of the Hume Highway and Roberts Road in the north to the intersection of Punchbowl Road and Cosgrove Road in the south.

The works to be undertaken by Sydney Ports for the Project include:

- detailed design of the enabling works, off-site and on-site base infrastructure;
- enabling works comprising:
  - demolition of site structures;
  - construction of the north sidings rail corridor;
  - removal of unsuitable materials, where required, and remediation of contaminated areas;
  - stabilisation, relocation or demolition of heritage items on the ILC Site; and
  - removal of RailCorp's aerial 11 kV wiring and power poles from the ILC site.



- construction by a main contractor of the off-site and on-site base infrastructure including:
  - earthworks;
  - stormwater trunk drainage system, water, fire water, sewer, electrical reticulation;
  - formation of noise mounds and detention/bio-retention basins;
  - landscaping;
  - internal roads, road bridge (over RailCorp's Marshalling Yards), hardstand to intermodal terminal and rail infrastructure;
  - construction of the frog habitat creation area; and
  - local road works and utility services.
- Tenant works – intermodal terminal, warehouses, empty container storage areas, administration buildings; and
- Light Industrial Commercial works.

Project Approval (the Approval) for the ILC Project was issued by the NSW Minister for Planning on 5 September 2007. Minor modifications to the Approval conditions were made by the Minister on 7 October 2008 and 30 March 2009.

The works carried out to date under the Approval are largely to prepare the site for the major construction phase from 2010 to 2011 and include:

- Demolition and removal of redundant rail workshop, maintenance and infrastructure facilities;
- Remediation of contaminated areas;
- Construction of the north sidings rail corridor; and
- Establishment of environmental monitoring facilities, controls and protection zones around sensitive areas and heritage assets.

## 1.2 Audit Objectives & Criteria

Condition 4.1 of the Approval requires Sydney Ports to develop and implement a Compliance Tracking Program to track compliance with the conditions of approval. The full condition is set out below:

*“The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall include, but not necessarily limited to:*



- a) provisions for periodic review of the compliance status of the project against the requirements of this approval;*
- b) provisions for periodic reporting of compliance status to the Director-General;*
- c) 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 Auditing;”and*
- d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance”.*

This independent environmental audit has been undertaken on behalf of Sydney Ports to fulfil the objective of meeting the requirements part c) of Condition 4.1c).

The audit criteria are set out in the conditions of Approval for the Project relevant to the current (ie construction stage) of the Project.

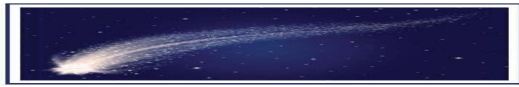
### **1.3 Audit Scope**

Sydney Ports’ ILC Project was the subject of this audit. The audit addressed the relevant requirements of the current stage of the project as discussed in section 2. The ILC project is being delivered in stages. At the time of the audit Sydney Ports had largely completed the demolition and remediation works and had constructed the north sidings rail corridor.

The audit included document review and interviews with Sydney Ports’ staff based at its corporate office in Windmill Street, Walsh Bay and an inspection of the project site in Enfield.

The following auditee representatives were interviewed during the course of the audit and assisted the auditor by providing access to records, procedures and the ILC site:

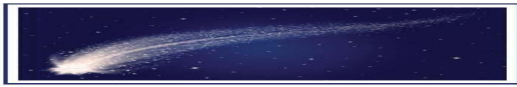
- Ricardo Prieto-Curiel, ILC Environment & Planning Manager (EPM)
- Alison Tourle, ILC Environmental Officer(EO)
- Virginia Mullins, ILC Project Administrator (PA)
- Bruce Royds, ILC Enabling Works Project Manager (PM)



## 1.5 Meetings

The following meetings were held by the auditor over the course of the audit:

MEETING TYPE	LOCATION	ATTENDEES	DATE
Opening meeting	Sydney Ports' Corporate Office, Walsh Bay	EPM PA PM Senior Development Manager (SDM) (Stephen Zaczekwicz)	30 November 2009
Desktop review	Sydney Ports' Corporate Office, Walsh Bay	EPM PA EO	3 December 2009
Site inspection	ILC Site, Enfield	EPM PM Student Trainee (Si Si Peng)	9 December 2009
Desktop review & outline of preliminary findings	Sydney Ports' Corporate Office, Walsh Bay	EPM EO Student Trainee	17 December 2009
Closing meeting & outline of findings	Sydney Ports' Corporate Office, Walsh Bay	EPM EO SDM PA	15 January 2010



## 1.6 Auditor

The audit was carried out by Steve Fermio of Steve Fermio Environmental on behalf of Sydney Ports. Steve Fermio is a RABQSA accredited independent environmental auditor (Certificate No 110498) specialising in environmental assessments and audits of infrastructure projects.

The audit was undertaken in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing.

I would like to acknowledge the cooperation of Sydney Ports in providing access to all documentation and sites requested during the audit.

## 2.0 AUDIT FINDINGS

Some of the Approval conditions – particularly those relating to the operation of the ILC facility – were not relevant to the construction phase of the project and these conditions are not reported on in this audit. The Audit Action List (Table 1) provides a summary of the audit findings along with Sydney Ports' proposed actions in response to the findings.

The audit checklist is provided in Appendix A. It includes all of the conditions relevant to construction phase of the project along with the evidence provided in support of compliance. The evidence is based on the review of the documentation provided to the auditor and an inspection of the ILC site by the auditor on 9 December 2009.

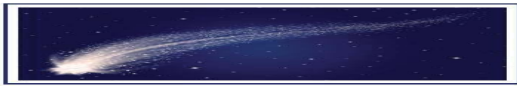
The checklist also includes any statement of commitments in the Preferred Project Report that were not included as specific conditions of Approval but are still required to be complied with under Condition 1.1 and some of the requirements of the approved Stage 1 CEMPs.

The findings are divided into three categories, namely '**Compliance**', '**Non Compliance**' or '**Opportunity for Improvement**'.

In this report a *non compliance* indicates the criteria have not been *fully* satisfied on the basis of the evidence provided or available to the auditor (ie partial compliance with a condition is classified as non compliance for the purpose of this audit).

Where an observation made during the audit could lead to an improvement in the management or demonstration of compliance this has been recorded as an *opportunity for improvement*.





## 2.1 Non compliance

One non compliance with the Approval was identified during the audit. This relates to the requirement of Condition 2.12 for the Road Transport Coordination Group to operate in accordance with its terms of reference (ToR).

The ToR require the Group to meet bi-monthly, however, the records available to the auditor indicate it has not been convened by Sydney Ports since August 2008. All of the other requirements of this Condition have been met.

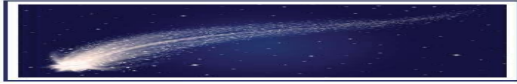


**Figure 1 Sediment & erosion controls around stormwater inlet at ILC Site**

## 2.2 Opportunities for Improvement

Several opportunities for improvement were identified during the audit including:

- Continual improvement of environmental performance could be enhanced by the development of a simple spreadsheet register to identify and monitor preventative and corrective actions in response to non-compliances, incidents and complaints. This register

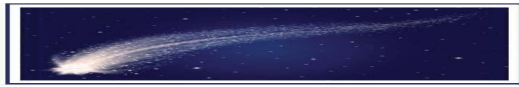


would be periodically reviewed by project management for lessons learned and to assist in continually improving project and corporate environmental management systems.

- Stage 1C CEMP and induction documentation should be revised (if further works are proposed to be carried out under this CEMP) to reference and identify any specific requirements of the Australian Standard for Demolition (AS 2601-2001);
- The risk assessment impact categories for the Stage 1A CEMP could be revised to better reflect the nature of the activities and risks being managed at the ILC site;
- Soil & Water Management Plans in CEMPs 1A, 1B & 1C could provide more specific details from the Blue Book on the design of sediment and erosion control measures that are likely to be required on a construction site.



**Figure 2 Frog habitat protection fencing near Coxs Creek**



## 2.3 Noise and Air Quality Monitoring

### Air quality monitoring

The following air quality reports were reviewed by the auditor:

- ILC Construction Dust Monitoring Program, February 2009 (Heggies Report No 10-7169-R3))
- ILC Construction Dust Monitoring Program, March 2009 (Heggies Report No 10-7169-R4)
- ILC Construction Dust Monitoring Program, June 2009 (Heggies Report No 10-7169-R7)

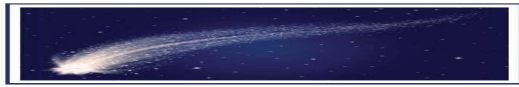
The reports indicate that the meteorological and dust parameters required to be monitored under Conditions 3.1 and 3.2 are being continuously monitored in accordance with the requirements of the conditions or as otherwise agreed by the Director-General.

The dust monitoring results indicate that PM<sub>10</sub> concentrations (24-hour) of greater than 50µgm<sup>-3</sup> were infrequently exceeded and on the occasions this level was exceeded, investigations were carried out in response to identify the likely cause. The dust monitoring reports and investigations in response to exceedances indicate that the few recorded exceedances appeared to be the result of external factors (eg. dust storm on the 23 September 2009, etc).

For example, the Heggies air quality monitoring report for February 2009 (Heggies Report No 10-7169-R4) indicates that exceedances of the 50µgm<sup>-3</sup> level were recorded in February 2009. However, investigations by Coffey Environmental in response to these exceedances (eg memo dated 12 February 2009) concluded it was unlikely that the elevated dust recordings were caused by activities being undertaken at the ILC Site due to the absence of work at that time and precipitation that day having wetted likely dust sources (eg soil stockpiles).

It is considered, based on the records available to the auditor, that Sydney Ports has responded actively and appropriately to any identified air quality exceedances consistent with the requirements of Condition 6.3 e).





**Figure 3 Wheel wash facility at ILC Site**

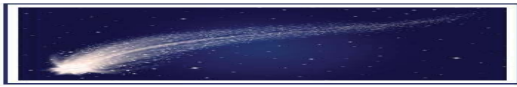
### **Noise monitoring**

The following noise monitoring reports were reviewed by the auditor:

- Construction Noise Compliance Monitoring, March 2009 (Renzo Tonin & Associates)
- Construction Noise Compliance Monitoring, August 2009 (Renzo Tonin & Associates)
- Construction Noise Compliance Monitoring, September 2009 (Renzo Tonin & Associates)

The reports indicate that construction noise was monitored in residential areas outside the site in accordance with the relevant CEMP requirements and that noise emissions from the ILC Site were either inaudible or barely audible over background noise sources (as evidenced by the attended monitoring carried out by Renzo Tonin and Associates).

The attended noise monitoring results show that while the  $LA_{10(15min)}$  criteria typically exceeded the background noise levels by more than 5dBA (ie above the Environmental Noise Control Manual criteria for construction projects more than 26 weeks duration), in all cases the noise monitoring technician noted this was caused by noise emissions external to the ILC Site.



**Figure 4 Southern weather & air quality monitoring station at ILC Site**

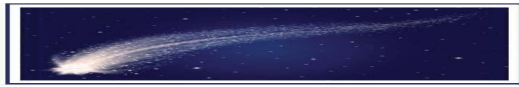
### **3.0 AUDIT CONCLUSIONS**

The review of compliance records required to satisfy the audit criteria (Conditions of Approval, Statement of Commitments and some of the requirements of the approved Stage 1 CEMPs) indicated a strong focus by Sydney Ports on achieving compliance through attention to detail in documentation, excellent record keeping and reporting to authorities as required.

Compliance records were well organised and complete and the records required to be made available on the Sydney Ports' website were available at the time of the audit.

Sydney Ports has demonstrated a high level of compliance with the Conditions of Approval and Statement of Commitments that are relevant to the site establishment phase of the ILC Project.

The site visit revealed a high level of compliance with the implementation of the relevant conditions and the requirements of construction management documentation (eg CEMPs and sub plans). This includes the establishment and maintenance of environmental monitoring and protection measures.



A review of meteorological, air quality and noise monitoring records indicate that the required monitoring is being undertaken (including calibration and quality controls) and that where exceedences of the relevant criteria are detected, investigations into the cause are undertaken appropriately and expeditiously.

A single non compliance and a number of opportunities for improvement were identified in the audit as detailed above.

It is recommended that Sydney Ports consider the advantages of implementing an integrated incidents, compliance and complaints register – to be regularly reviewed by ILC project management - to assist both the project and the organisation achieve continual improvement of its environmental performance in accordance with Sydney Ports' environmental policy.

**Table 1- AUDIT ACTION LIST**

No	Item	Non compliance (N) Opportunity for Improvement (O)	Action Item	Proposed Action	Who By	When	Date Closed
1	CoA 2.12	N	The Terms of Reference (ToR) for the Road Transport Coordination Group (RTCG) require it to meet bi-monthly however the records indicate that the Group has not met since August 2008.	Sydney Ports will recommend to the RTCG that the RTCG amend the ToR to change the frequency of meetings from bi-monthly to "on an as needs basis."	RTCG	Next RTCG meeting	
2	CoA 2.49	O	Demolition work is required to be carried out in accordance with AS 2601-2001, however Pacific National's CEMP for Stage 1C (Demolition Works) and Induction Booklet do not refer to AS 2601-2001. Documentation should provide evidence of the application of relevant Standards	No action proposed in respect of PN's works, as the works have been completed. Sydney Ports will ensure that any future CEMPs involving demolition will refer to AS 2601-2001.	N/A  EPM	At the time of preparing future CEMPs	
3	CoA 6.2	O	The Risk Assessment impact categories for the Stage 1A CEMP refer to mining operations rather than the type of development being carried out at the ILC site.	Sydney Ports will ensure that future CEMPs include Risk Assessment impact categories relevant to the works.	EPM	At the time of preparing future CEMPs	
4	SoC No increased sedimentation of nearby waterways	O	Soil & Water Management Plans were sighted in CEMPs 1A, 1B & 1C but design details for typical sediment and erosion control measures referred to in the Blue Book were not provided in the SWMPs.	Sydney Ports will ensure that contractors include design details of typical sediment and erosion controls referred to in the Blue Book in SWMP documentation.	EPM	At the time of preparing future CEMPs	



No	Item	Non compliance (N) Opportunity for Improvement (O)	Action Item	Proposed Action	Who By	When	Date Closed
5	<b>Compliance &amp; incident management</b>	<p><b>O</b></p>	<p>Consistent with Sydney Ports' environmental policy of continual improvement in its environmental performance, it is suggested consideration be given to the development of a simple spreadsheet register to track the status of preventative and corrective actions in response to:</p> <ul style="list-style-type: none"> <li>• Non-compliances</li> <li>• Complaints</li> <li>• Environmental incidents</li> <li>• Audit findings.</li> </ul> <p>The register could also be used to identify the root cause of an incident, and be tabled at management meetings to assist in the process of continual improvement of project and corporate procedures.</p>	<p>Sydney Ports will develop a register of project environmental issues to record non-compliances, complaints, environmental incidents and audit findings.</p> <p>Sydney Ports will use the register to assist in the process of continual improvement. The register will be distributed to relevant Sydney Ports' managers at an agreed frequency.</p> <p>A meeting will be held to discuss the items on the register once per month, or as required. The Register would be tabled at the meeting. The following would be discussed at the meeting:</p> <ul style="list-style-type: none"> <li>• Responses to any non-compliances, complaints, incidents and audit findings.</li> <li>• Prevention measures to avoid future non-compliances,</li> <li>• Environmental performance review for the project.</li> </ul> <p>The meeting would be attended, as appropriate by the SDM, Sydney Ports' PMs, PA and Environmental Planning Team members.</p>	SDM & EPM	1st quarter 2010  Monthly or as required	



**APPENDIX A:        AUDIT CHECKLIST**

---

**AUDIT CHECKLIST**

*Rows highlighted in red indicate either non-compliances or opportunities for improvement*

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
1.1	The Proponent shall carry out the project generally in accordance with the environmental documentation....	Y	Modification Application No 4 (31 August 2009) submitted to DoP in response to proposed changes to Project resulting from detailed design  Undated or referenced AECOM spreadsheet (33pp) assesses compliance of detailed design with CoA and references evidence of compliance and relevant drawings.  Non-Compliance/Departures Register tracks status and proposed actions to mitigate identified non compliances with concept design, CoA, standards etc  No additional requirements imposed by DG at this stage
1.3	The Proponent shall comply with any reasonable requirement(s) of the DG arising from the Department's assessment of any reports, plans or correspondence submitted in accordance with the approval and the implementation of any actions or measures contained in these reports, plans or correspondence.	Y	
1.3A	The Proponent may construct and/or operate the project in stages with commensurate staging of compliance with the conditions of this approval...	Y	Sydney Ports' CEMP Framework endorsed by DoP on 25 July 2008
1.12	The Proponent shall ensure that all licences, permits and approvals are obtained and kept up-to-date... The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	Y	Copy of CoA sighted at site office.  Coffey's Compliance Reports provide evidence of permits/approvals obtained for the works carried out to date.
2.12	The Proponent shall establish and maintain for the life of the project...a <b>Road Transport Coordination Group</b> to oversee and coordinate the management of traffic and road issues... including representatives of the Proponent, the Department, the RTA, Strathfield Municipal Council and Bankstown City Council...	N	Copies of minutes of 15 May & 6 August 2008 sighted on ILC website.  <b>ToR of this group requires it to meet bi-monthly however it has not met since August 2008.</b>

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
2.13	The Proponent shall minimise noise emissions from plant and equipment operated on the site by installing and maintaining, wherever practicable, efficient silencers, low-noise mufflers (residential standard) and by replacing reversing alarms with alternative silent measures, such as flashing lights (subject to OHS requirements).	Y	No construction activity occurring on site at the time of the site inspection.  Compliance noise monitoring reports indicate that noise from the enabling works were not audible in residential areas
2.14	The Proponent shall, as soon as practicable during site preparation, and prior to the commencement of construction of rail trackwork and hardstand for the intermodal terminal, empty container and warehousing components of the project, install earth mound noise barriers in the south east of the site, as generally described in the documents referred to under condition 1.1 of this approval.	Y	The construction of the noise mound is scheduled to take place as part of the next phase of works and was not required for the preparatory works that have occurred.
2.15	The Proponent shall only undertake site preparation and construction activities associated with the project that would generate an audible noise at any residential premises during the following hours: a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays. This condition does not apply in the event of a direction from police or other relevant authority for safety reasons.	Y	No construction activity occurring on site at the time of the site inspection  Quarterly compliance reports prepared by Coffey Environmental indicate no works were undertaken outside the approved hours for construction
2.16	The hours of site preparation and construction activities specified under condition 2.15 of this approval may be varied with the prior written approval of the Director-General...	Y	No requests have yet been made for any out of hours work
2.20	The Proponent shall install, operate and maintain a meteorological monitoring station to monitor weather conditions representative of those on the site, in accordance with: a) AM-1 Guide to Siting of Sampling Units (AS 2922-1987); b) AM-2 Guide for Horizontal Measurement of Wind for Air Quality Applications (AS 2923-1987); and c) AM-4 On-Site Meteorological Monitoring Program Guidance for Regulatory Modelling Applications.	Y	Meteorological monitoring station installed near the Tarpaulin Factory and records of its active use were observed (Figure 4). Logged into real-time weather monitoring on 3 December 2009 and observed active and continuous records being kept.  The meteorological station is continuously operated and maintained by Heggies Australia on behalf of Sydney Ports as evidenced in monthly air quality reports.

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
	The Proponent shall install the meteorological monitoring station prior to the commencement of site preparation or construction works and shall use the station to undertake the monitoring required under condition 3.1 of this approval....		
2.21	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 land owned by the Proponent (the site the subject of this approval).	Y	No offensive odours were detected during the site inspection and no complaints regarding offensive odours have been made by surrounding residents/businesses.
2.22	The Proponent shall design, construct, commission, operate and maintain the project in a manner that minimises or prevents the emission of dust from the site including windblown and traffic generated dust.	Y	Vegetative cover has been maintained over as much of the site as possible to reduce dust generation. A water cart has been used on site during demolition/remediation works and a photograph of this equipment dated 12 August 2009 was provided.
2.23	The Proponent shall take all practicable measures to ensure that all vehicles entering or leaving the site, carrying a load that may generate dust, are covered at all times, except during loading and unloading....	Y	No work occurring on site at time of inspection but compliance reports prepared by Coffey's in January, May, July & November 2009 attest to this requirements being met.
2.24	All activities on the site shall be undertaken with the objective of preventing visible emissions of dust beyond the boundary of the site. Should such visible dust emissions occur at any time, the Proponent shall identify and implement all practicable dust mitigation measures... such that emissions of visible dust cease.	Y	No work occurring on site at time of inspection but compliance reports prepared by Coffey's in January, May, July & November 2009 attest to these requirements being met.
2.25	The Proponent shall seal and maintain all internal haulage roads with bitumen, gravel or other material agreed to by the Director-General.	Y	Haulage roads within the site were observed to be either sealed with bitumen or covered with aggregate to reduce dust emissions at the time of the inspection
2.26	The Proponent shall apply and enforce a 25 km/ h speed limit on the site during site preparation and construction works to minimise the potential for dust generation.	Y	25km/h speed limits signs observed in place at the entrance to and within the site.
2.27	The Proponent shall ensure that all vehicles and equipment directly associated with site preparation and construction works (as distinct from passenger vehicles) pass through a wheel wash prior to leaving the site.	Y	Wheel wash facility observed to be installed (Figure 3)
2.28	Except as may be expressively provided under an Environment Protection Licence applicable to the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment</i>	Y	No discharges were observed leaving the site during the site inspection. Sediment and erosion controls were observed to have been installed around stormwater ingress points.

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
2.29	<i>Operations Act 1997</i> which prohibits the pollution of waters. Soil and water management controls shall be employed to minimise soil erosion and the discharge of sediment and other pollutants... in accordance with Landcom's <i>Managing Urban Stormwater: Soils and Construction</i> .	Y	Sediment and erosion controls were observed to have been installed around stormwater ingress points (Figure 1). Wheel wash and rumble grids were installed and frog fencing also provides protection of adjacent waterways from sediment laden runoff
2.30	All stockpiled construction materials shall be adequately stabilised and covered to prevent erosion or dispersal of the materials.	Y	Stockpiled material was either vegetated or had been wetted to form a seal to prevent dust being generated and to reduce erosion. Stockpiles were positioned so as to drain into adjoining excavated cells that were being used for the placement and capping of contaminated soil.
2.31	The Proponent shall construct and maintain stormwater detention basins on the site, generally consistent with the basin sizes/ locations presented in the document referred to under condition 1.1(d) of this approval...	Y	Not applicable at this stage of construction
2.34	Except for necessary stabilisation works agreed in consultation with the NSW Heritage Office, the Proponent is not permitted to destroy, modify or otherwise physically affect the Tarpaulin Factory as part of this approval..	Y	As required by the condition the Tarpaulin Factory has not been physically affected by the works
2.35	The Proponent shall relocate and maintain the Pillar Water Tank to an appropriate location within the site, determined in consultation with the NSW Heritage Office.	Y	Temporary exclusion fencing was observed to be in place around the base of the Pillar Water Tank (Figure 5) Under the Heritage Interpretation Plan and Strategy prepared under CoA 6.3c) and approved by DoP Sydney Ports will relocate the Pillar Water Tank to an area in the south-eastern part of the site. The Heritage Office in a letter to Sydney Ports dated 20 November 2008 indicated its acceptance of this proposal.
2.36	The Proponent shall undertake such works as may be necessary to stabilise the Pillar Water Tank as part of the relocation of that heritage item on the site....	Y	No relocation works have been carried out as yet as Sydney Ports has advised it is currently tendering these works
2.37	The Proponent shall relocate and maintain the Pedestrian Footbridge, if feasible, to an appropriate location within the site, determined in consultation with the NSW Heritage Office...	Y	The entrances to the stairs on the Pedestrian Footbridge had been secured with temporary fencing to prevent unauthorised access. The Heritage Office in correspondence dated 20 & 26 November 2008 has accepted the relocation of the Pedestrian Footbridge to the southern part of the site.
2.38	The Proponent is permitted to destroy the Yard Master's Office, the Administration Building, and the Wagon Repair Shed (and	Y	These works have been completed and letter from Heritage Office of 3 November 2008 indicating satisfaction with archival recording was sighted.

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
	<p>associated Gantry Crane). Prior to the destruction of these items, the Proponent shall engage an independent, qualified heritage expert to prepare an archival recording of these items in accordance with NSW Heritage Office guidelines. Destruction of these items shall not commence until the NSW Heritage Office has indicated its satisfaction with the archival recordings and the recordings have been lodged with the Strathfield Public Library, or other repository agreed by the DG.</p>		<p>Strathfield Council letter of 13 November 2008 acknowledging receipt of archival recording was sighted.</p>
2.39	<p>All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials.</p>	Y	<p>Offsite material tracking register containing details of general and liquid waste items sent to Kemps Creek and Camellia respectively dated 12 March 2009 sighted.</p> <p>Delivery dockets for Kemps Creek for various dates in January and February 2009 were also sighted in Coffeys Compliance Report No 2.</p>
2.40	<p>The Proponent shall ensure that all liquid and/ or non-liquid waste generated and/ or stored on the site is assessed and classified in accordance with the EPA's Environmental Guidelines: <i>Assessment, Classification and Management of Liquid and Non-Liquid Wastes</i> (Waste Guidelines) in force as at 1 July 1999.</p>	Y	<p>Compliance reports prepared by Coffey's in January, May, July &amp; November 2009 attest to these requirements being met.</p>
2.41	<p>The Proponent shall ensure that the transport of any hazardous and/ or industrial and/ or Group A waste from the site is conducted strictly in accordance with any requirements that may be specified by the DECC in relation to the transport of those wastes.</p>	Y	<p>Compliance reports prepared by Coffey's in January, May, July &amp; November 2009 attest to these requirements being met in respect of asbestos wastes</p>
2.42	<p>The Proponent shall ensure that contaminated areas of the site are remediated prior to the commencement of site preparation and construction works associated with the project that may directly disturb those areas...</p>	Y	<p>Site Audit Statement (Part A) for SP1 dated 22 August 2009 sighted and letter to DG of 31 August submitting SAS also sighted.</p> <p>Soil remediation works including land farming of hydrocarbon contaminated soils were observed to have been completed or underway during site inspection prior to construction of infrastructure components.</p>
2.43	<p>Prior to the commencement of site preparation and construction works.. that may directly disturb known contaminated areas of the site, the Proponent shall submit to the DG a Site Audit Statement(s), prepared by an accredited Site Auditor.. verifying that the area of the site on which construction is commencing has been</p>	Y	<p>Site Audit Statement (Part B) for SP1 dated 19 February 2009 and SAS Part B for the rest of the site dated 2 July and 4 November 2009 were sighted.</p>

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
2.44	<p>or can be remediated to a standard consistent with the intended land use....</p> <p>The Proponent shall manage any asbestos or asbestos-contaminated materials that may be uncovered during the construction..in accordance with the requirements under <i>Protection of the Environment Operations (Waste) Regulation 2005</i> and any guidelines or requirements issued by the DECC in relation to those materials.</p>	Y	<p>Compliance reports prepared by Coffey's in January, May, July &amp; November 2009 attest to these requirements being met in respect of asbestos wastes</p>
2.48	<p>The Proponent shall implement all of the relevant actions for the site recommended in the <i>Management Plan for the Green and Golden Bell Frog Key Population at Greenacre</i> (DECC, May 2007)... These actions shall be incorporated within both the Construction Environmental Management Plan (refer to condition 6.2)... and periodically reporting outcomes to the DECC at a frequency agreed with the DECC.</p>	Y	<p>Frog exclusion fencing observed to have been installed on site in the locations set out in Stage 1A Enabling Works Environmental Control Map (Drawing No SEDP111C) (Figure 2)</p> <p>A Frog Management Plan (Rev 3) and Frog Protection Plan (Rev 3) have been prepared by Sydney Ports' herpetologist in consultation with DECCW in accordance with the requirements of this condition. These plans have been incorporated within the CEMPs.</p> <p>The reporting requirements of the plans will commence once the frog habitat creation area has been constructed and commissioned (in accordance with DECC letter dated 24 September 2008).</p>
2.49	<p>All demolition work shall be carried out in accordance with AS 2601-2001 <i>The Demolition of Structures</i>.</p>	Y	<p><b>As Pacific National's CEMP for Stage 1C (Demolition Works at Enfield DELEC) and Induction Booklet do not refer to AS 2601-2001 it is not possible to determine whether this Standard was complied with during the demolition of the DELEC site.</b></p> <p><b>EnviroPacific's CEMP for Stage 1B does refer to AS 2601 and EnviroPacific obtained a demolition permit for their demolition works from WorkCover (Table 6 of CEMP)</b></p> <p><b>It is suggested that if any future ting to demolition works is undertaken under the Pacific National CEMP for Stage 1C that this document be reviewed for consistency with AS 2601</b></p>
2.50	<p>The Proponent shall store and handle all dangerous goods ... strictly</p>	Y	<p>No dangerous goods stored on site during site inspection</p>



CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
	<p>in accordance with:</p> <ul style="list-style-type: none"> <li>a) all relevant Australian Standards;</li> <li>b) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</li> <li>c) the DECC's Environment Protection Manual Technical Bulletin <i>Bunding and Spill Management</i>...</li> </ul>		
3.1	<p>From the commencement of site preparation and construction works...the Proponent shall continuously monitor, utilising the meteorological monitoring station referred to under condition 2.20 of this approval, each of the parameters listed in <b>Table 4...</b></p>	Y	<p>These parameters were observed to be under continuous monitoring during a check of the online meteorological data feed on 3 December 2009.</p>
3.2	<p>The Proponent shall, from the commencement of soil disturbing works on the site until all large exposed areas have either been landscaped or sealed, continuously monitor ambient dust concentrations (PM10) at two of the most-affected residential receptor(s) to the site... employing the sampling and analysis methods specified under AM-18 or AS3580.9.8.. Results of dust monitoring shall be recorded..and shall be utilised for the purpose of site preparation and construction dust management...</p>	Y	<p>The two monitoring stations were observed to be in place at the time of the site inspection. The dust monitoring station at the northern end of the site was undergoing calibration with the dust monitoring station located at the meteorological station near the Tarpaulin Shed.</p> <p>During calibration, Heggies Australia replaces the northern dust monitor with another Dustrak monitor to ensure continuous monitoring occurs.</p> <p>Continuous dust monitoring results from the monitors are uploaded via a modem to a website which Sydney Ports' contractors can access to obtain real time results for immediate use on site.</p> <p>Monitoring records sighted include monthly air quality reports from Heggies and written notifications from Coffey Environments to Sydney Ports notifying the latter of dust exceedences on 21/22 January 2009 and 10/11 February 2009 including potential causes and mitigation measures in response to exceedences.</p>
4.1	<p>The Proponent shall develop and implement a <b>Compliance Tracking Program</b> to track compliance with the requirements of this approval....</p>	Y	<p>Compliance Tracking Program (August 2008) available on ILC website and Compliance Tracking Report (April 2009) sighted and this audit evidence of compliance with this condition</p>
5.1	<p>Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.</p>	Y	<p>ILC Enfield Website provides links to relevant documents</p>



CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
5.2	<p>Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints and enquiries for the life of the project (including construction and operation.... 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. This information is also to be provided on the Proponent's website.</p>	Y	<p>Required information available on ILC website and on signage at main entrances to the site</p>
5.3	<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>	Y	<p>Consultation Manager website used and was accessed on 3 December 2009. No complaints from public have been recorded to date.</p>
5.4	<p>The Proponent shall establish and maintain a new website, or dedicated pages within its existing website for the provision of electronic information associated with the project. The Proponent shall publish and maintain up-to-date information on this website or dedicated pages including, but not necessarily limited to... d) the outcomes of compliance tracking in accordance with condition 4.1 of this approval.</p>	Y	<p>Environmental documents, approvals and Compliance Tracking Program sighted on website on 2 December 2009.  Project Updates, Newsletters, Q&amp;As and other information sighted on ILC website</p>
6.2	<p>Prior to the commencement of site preparation works or construction of the project, the Proponent shall prepare and submit for the approval of the Director-General a <b>Construction Environmental Management Plan</b> to detail an environmental management framework, practices and procedures to be followed during site preparation and construction of the project. The Plan shall be prepared in accordance with <i>Guideline for the Preparation of Environmental Management Plans</i> (DIPNR 2004) and shall include, but not necessarily be limited to.... The Construction Environmental Plan shall be made available for inspection by the public upon request following its approval by the Director-General.</p>	Y	<p>CEMP (Framework, November 2008), Stages 1A – C CEMPs sighted on website 2 December 2009.  DoP letters of approval of CEMPs for Stages 1A, 1B &amp; 1C sighted  <b><i>It is noted that the Risk Assessment impact categories for the Stage 1A CEMP are designed for mining operations and should be reviewed for their applicability to infrastructure construction</i></b></p>

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
6.3	<p>As part of the Construction Environmental Management Plan for the project, required under condition 6.2 of this approval, the Proponent shall prepare and implement the following Management Plans:</p> <p>a) <b>Construction Noise Management Plan</b>  b) <b>Construction Traffic Protocol</b>  c) <b>Heritage Interpretation Plan &amp; Strategy</b>  d) <b>Landscape &amp; Ecological Area Management Plan</b>  e) <b>Construction Dust Management Protocol...</b></p>	Y	<p>Stage 1A, 1B &amp; 1C CEMPs contain the required sub plans.</p> <p>Implementation of requirements of CEMPs was observed on site (in spite of no construction works being carried out at the time of the inspection) including:</p> <ul style="list-style-type: none"> <li>• Air quality monitoring stations installed at designated locations</li> <li>• Frog exclusion fencing installed</li> <li>• Sediment and erosion controls installed around stormwater inlets</li> <li>• In accordance with Section 8 of Stage 1C CEMP, a Green and Golden Bell Frog survey was undertaken in the Building 28 Area to be demolished prior to the demolition works. The frog survey report was sighted</li> <li>• Temporary fencing was installed by PN in accordance with Section 4.3 of the Stage 1C CEMP</li> <li>• In accordance with Section 7 of the Stage 1C CEMP the demolition area was observed during the site inspection to have been cleaned and left free of debris and surface obstructions, and the ground surface was graded to provide adequate cross fall for surface drainage.</li> <li>• Evidence of daily inspection checklists having been completed was observed in Coffey's compliance reports</li> </ul>
7.1	<p>The Proponent shall notify the Director-General of any incident with actual or potential significant off-Site impacts on people or the biophysical environment as soon as practicable after the occurrence of the incident. The Proponent shall provide written details of the incident to the Director-General within seven days of the date on which the incident occurred.</p>	Y	<p>To date, no incidents have occurred with actual or potential offsite impacts that would require reporting to the DG</p>
7.2	<p>The Proponent shall maintain a register of accidents, incidents and potential incidents with actual or potential significant off-Site impacts on people or the biophysical environment. The register shall be made available for inspection at any time by the independent qualified person or team conducting the Environmental Audit and/or the Director-General.</p>	Y	<p>Consultation Manager website supports an Incident Register for the Project</p>
7.3	<p>The Proponent shall meet the requirements of the Director-General</p>	Y	<p>No incidents have occurred as yet</p>

CoA	Summary of requirement	Compliance status Y/N	Evidence of implementation/comment
	to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 7.1 of this consent, within such period as the Director-General may agree.		

SoC	Summary of requirement	Compliance Status Y/N	Evidence of implementation/comment
Minimise impacts of ILC on surrounding amenity	CEMP to include (other than those plans required under CoA 6.3): <ul style="list-style-type: none"> <li>• Works on Railcorp land</li> <li>• Soils &amp; contamination</li> <li>• Hydrology &amp; water quality</li> <li>• Waste management (see SoC below)</li> <li>• Energy &amp; water (see SoC below)</li> <li>• Consultation (see SoC below)</li> </ul>	Y	All relevant sub plans contained within CEMPs for Stages 1A-1C.
Minimise dust emissions during construction	Dust Management Plan to include: <ul style="list-style-type: none"> <li>• Construction of wind breaks</li> <li>• Minimise area of exposed land</li> </ul>	Y	Shade cloth installed on cyclone fencing on Cosgrove Road portion of site and vegetative cover maintained over all areas not subject to remediation or demolition.
No increased sedimentation of nearby waterways	Prepare Soil & Water Management Plan consistent with Blue Book	Y	Soil & Water Management Plans were sighted in CEMP 1A, 1B & 1C but these did not provide the level of detail on the design of typical sediment and erosion control measures that would be commensurate with the Blue Book
Minimise visual impacts during construction	Landscaping and noise mounds installed during early stages of construction to screen site appropriate for location and type of activities being carried out. Mounds to be revegetated as soon as possible during construction	Y	Visual impacts currently minimised through the use of shade cloth to screen the site from the heavily trafficked Cosgrove Road and the retention of vegetative cover on undisturbed areas.
Minimise waste generated and maximise re-use and	A Waste Management Plan (WMP) would be prepared and implemented. This would include...	Y	Waste Management Plans observed in CEMPs.

SoC	Summary of requirement	Compliance Status Y/N	Evidence of implementation/comment
recycling. Waste disposal to be undertaken when re-use and recycle is not possible			
Manage energy usage and water consumption	Energy and Water Management Strategies will be developed as part of CEMP. Suitable measures would be identified and implemented during the construction phase. Energy management measures could include...	Y	Energy Management Strategies were observed in CEMPs
Consultation with community and relevant agencies.	A Consultation Plan would be prepared and implemented. This will include...:	Y	Community Consultation Plan, November 2008 sighted. Community Liaison Committee established as per Plan and minutes of two meetings held were sighted