

**SYDNEY PORTS
CORPORATION**

**INDEPENDENT ENVIRONMENTAL
COMPLIANCE AUDIT
INTERMODAL LOGISTICS CENTRE –
ENFIELD, NSW**



DECEMBER 2011



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List of Abbreviations

AS	Australian Standard
BoM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CoA	Condition of Approval
DECCW	Department of Environment, Climate Change and Water (Currently OEH)
DG	Director-General (of Department of Planning & Infrastructure)
DoP	Department of Planning (currently DP&I)
DP&I	Department of Planning and Infrastructure (formerly DoP)
EET	Environmental Essentials Training (internal Leighton Contractors' training program)
EM	Environment Manager (LCPL)
ESCP	Erosion and Sediment Control Plan
FHCA	Frog Habitat Creation Area
ILC	Intermodal Logistics Centre
LCPL	Leighton Contractors Pty Ltd
LL	Lend Lease
OEH	Office of Environment and Heritage
OOHW	Out of Hours Works
PM	Project Manager (LCPL)
PM10	Particulate matter 10 micrometers or less in diameter
RABQSA	Registrar Accreditation Board and Quality Society of Australasia International
RTCG	Road Transport Coordination Group
SoC	Statement of Commitment

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 includes:

- 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;
- off-site works including the construction of a road bridge over the existing RailCorp Marshalling Yards for access to Wentworth Street, upgrade the entrance to the site from 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; and
- An area at the southern part of the site for ecological enhancement and community opportunities.

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 for the Project include:

1. Detailed design;
2. Enabling works generally comprising:
 - demolition of site structures (completed);
 - construction of the north sidings rail corridor (completed);

- removal of unsuitable materials, where required, and remediation of contaminated areas (largely completed);
 - stabilisation, relocation or demolition of heritage items on the ILC Site (largely completed); and
 - removal of RailCorp’s aerial 11 kV wiring and power poles from the ILC site (completed).
3. Early works including a road bridge over RailCorp’s New Enfield Marshalling Yards (largely completed), northern and southern rail connections, south-east noise earth barrier (completed), frog habitat creation area (ponds and frog ponds’ fringing habitat area completed) and other associated minor works;
 4. Construction (by main contractor/s) of the main off-site and on-site base infrastructure;
 5. Tenant works – intermodal terminal, warehouses, empty container storage areas, administration buildings; and
 6. Light Industrial Commercial works.

Project Approval (the Approval) for the ILC Project was issued by the NSW Minister for Planning on 5 September 2007. Modifications to the Approval conditions were made by the Minister on 7 October 2008, 30 March 2009, 27 May 2010 and 10 November 2011.

Leighton Contractors Pty Ltd (Leighton Contractors) was engaged by Sydney Ports in September 2010 to undertake the works associated with 3 and 4 above.

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 4.1.

The criteria to be audited included:

- The Conditions of Approval (CoA);
- Statement of Commitments (SoC);
- Mitigation measures in the Stage 3 CEMP prepared by Leighton Contractors; and
- The status of the previous 2010 Independent Audit findings (Table 1).

1.3 Audit Scope

Sydney Ports' ILC Project was the subject of this audit. The ILC project is being delivered in stages. At the time of the audit (November/December 2011) Leighton Contractors had largely completed construction of the road bridge across the RailCorp marshalling yards and had completed construction of the frog ponds, south-east noise mound and construction sedimentation basins and other water quality controls. Cut and fill activities were underway at the time of the audit. Works associated with the main on and off-site base infrastructure was in progress.

The audit included document review, interviews with Sydney Ports' and main contractor staff at the Enfield Site Project Office and an inspection of the project site.

Some of the conditions of approval for the ILC Project were not relevant to this audit as they are related to operational or other phases of the Project that are yet to commence.

1.4 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' and Leighton Contractors' personnel in providing access to all documentation and sites requested during the audit.

1.5 Meetings

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

TYPE	LOCATION	ATTENDEES	DATE
Opening meeting	Sydney Ports' ILC Project Site Office, Enfield	Stephen Zaczekiewicz – Sydney Ports' Senior Development Manager Virginia Mullins – Sydney Ports' Projects Coordination Manager Steve Fermio – Auditor Jason Pearson – Leighton Contractors' Project Manager Ricardo Prieto-Curiel – Sydney Ports' ILC Environment and Planning Manager (Lend Lease(LL)) Peter Phillips – Sydney Ports' Project Manager (TSA Management) Bruce Royds – Sydney Ports' Senior Construction Manager George Kollias – Leighton Contractors' Environment Manager Kathy Lloyd – Leighton Contractors' Site Environment Officer Alison Tourle – Sydney Ports' ILC Environment Officer (Evans & Peck) Laura Whitehouse – Sydney Ports' ILC Environment Officer (Evans & Peck)	17 November 2011
Desktop review	Sydney Ports' ILC Project Site Office, Enfield	Steve Fermio Ricardo Prieto-Curiel Alison Tourle	17 November 2011
Site inspection and review of Leighton records	ILC Site, Enfield	Steve Fermio George Kollias Kathy Lloyd Ricardo Prieto-Curiel	23 November 2011
Closing meeting	ILC Site, Enfield	Steve Fermio Ricardo Prieto-Curiel Virginia Mullins George Kollias Kathy Lloyd Peter Phillips Alison Tourle	1 December 2011

2.0 AUDIT FINDINGS

The Audit Action List (Table 2) provides a summary of the audit findings. Sydney Ports' and Leighton Contractors' actions in response to these findings will be reviewed as part of the 2012 Independent Audit.

The Audit Checklist is provided in Appendix A and includes details of all of the evidence provided in support of compliance based on documents and evidence provided to the auditor, information made available online and an inspection of the ILC site on 23 November 2011.

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

In this report a *non compliance* indicates the criteria (condition or commitment) have not been satisfied on the basis of the evidence available. 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 Compliance Status

No non compliances with the CoA or SoC were identified during the audit.

2.2 Opportunities for Improvement

Several observations made during the audit present opportunities for improvement including:

- Under Condition 2.12 the Road Transport Coordination Group (RTCG) is required to operate in accordance with its terms of reference, with the frequency of meetings set at its February 2010 on a quarterly basis. However, this schedule has not been strictly met (by mutual agreement), as the RTCG decided not to hold its 24 February meeting this year and held a site inspection on 12 May 2011 instead of a minuted meeting.

It is suggested that the RTCG review its ToR with respect to the frequency of meetings to provide more flexibility in setting meeting dates as needed during different stages of the project.



Plate 1: Frog ponds installed with south-east noise mound in background

- Under Condition 2.20 a weather station is required to be installed and operated on site for the duration of construction. The station was offline while undergoing repairs from January to June 2011. Although nearby Bureau of Meteorology stations at Canterbury Racecourse and Bankstown Airport were able to provide satisfactory weather information for the management of air quality at the site, measures should be taken to reduce the potential for the onsite station to be out of action for a long duration.
- The Stage 3 CEMP (section 12.4.1) requires a Leighton Contractors' Environment Branch inspection to be held quarterly. No documentary evidence was provided that this inspection has occurred.



Plate 2: Tarpaulin Shed (background) with Pillar Water Tank (foreground)

2.3 Noise and Air Quality Monitoring

Air quality monitoring

Monthly dust monitoring reports prepared by SLR (incorporating Heggies Pty Ltd) for January to September 2011, which includes the period of commencement of the overbridge works, were reviewed. These reports indicate that with the exception of some technical faults resulting in data losses or unreliable readings¹, 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.

¹ As the air quality specialist consultant (SLR) has not raised any issues or concerns with the frequency or duration of the data interruptions and losses, it is assumed that these are not considered atypical for the equipment being used.

The dust monitoring results indicate that PM₁₀ concentrations (24-hour) of greater than 50 µgm⁻³ were exceeded infrequently and, on the occasions this level was exceeded, by a marginal amount. Investigations carried out in response to the likely cause indicated that any elevated dust concentrations were unlikely to have been caused by any site activities.

Analysis of the NSW Office of Environment & Heritage (OEH) air quality monitoring data recorded at the nearby Chullora and Earlwood sites indicated that elevated readings on site were consistent with elevated levels of PM₁₀ experienced across the region.

Noise monitoring

Construction noise monitoring at the ILC site is being undertaken by Leighton Contractors. Noise monitoring of works carried out during the rail possessions in February and March 2011 indicate that the construction noise objectives at the nearest residential receivers were met.

2.4 Previous audit findings

A review of the status of actions proposed by Sydney Ports in response to the 2010 Independent Audit findings was undertaken as part of this audit (Table 1).

Four findings were made in the 2010 Audit and three can now be considered closed.

Identified as an 'Opportunity for Improvement' in the 2010 Audit, Leighton Contractors' Environmental Essentials Training (EET) has not been implemented on site for leadership and influencing positions including site engineers, supervisors and construction managers as required by the CEMPs for Stage 2 & 3.

The EET has still not been implemented as it is undergoing internal review, however, it is understood that in its place Erosion & Sediment Control Training is being provided to relevant personnel. The Stage 3 CEMP should be amended to reflect this change.

Table 1: Response to 2010 Audit Findings

No	Item	Non compliance (N) Opportunity for Improvement (O)	Finding	Action proposed/undertaken	Date Closed
1	NA	O	Corer casings had been placed under the drip line of Casuarina trees to be retained near the overbridge foundation works on the Wentworth Avenue side of the site. Consideration should be given to removing the casings and fencing off the area under the drip line of these trees (& any other trees to be retained on site) to prevent a recurrence and amending the Environmental Checklist (Appendix D of Stage 2 CEMP) to include specific reference to root zone protection for those trees to be retained.	Item was addressed on day of inspection during previous audit. Environmental Checklist includes this as an item to be checked	23/11/11
2	CoA 6.2(g)	O	Leighton Contractors' Environmental Essentials Training for leadership and influencing positions, including site engineers, supervisors and construction managers, is yet to be substantially rolled out on site, as required by the Stage 2 CEMP. The induction of relevant personnel into this program at the earliest opportunity should be prioritised.	Environmental Essentials (EE) training has been put on hold for LCPL. ERSED training has been substituted for EE training & 1 st ERSED training held on 14/7/11. Stage 3 CEMP to be revised to reflect this change.	
3	CoA 7.1	O	Consideration should be given to amending the 'impact' column in Sydney Ports' Incident Register to include an assessment of whether actual or potential significant off-site impacts on people or biophysical environment have occurred. This would enable the reasons behind any decision to notify (or not notify) the Director-General of an incident to be recorded.	'Impact' column added to Incident Register.	23/11/11
4	CoA 3.2	O	Dust monitoring reports indicate that the DustTrak used at the northwest of the site was subject to technical faults resulting in some data losses. It is recommended that this be evaluated to determine if the frequency/duration of the faults are within normal operational limits for the equipment.	Records indicate Dust Trak less prone to breakdowns during 2011	23/11/11



Plate 3: Asbestos storage skip in protective enclosure

3.0 AUDIT CONCLUSIONS

The review of compliance records required to satisfy the audit criteria indicated a continuing strong focus by Sydney Ports on achieving compliance through attention to detail in documentation, excellent record keeping and reporting to authorities.

Sydney Ports' and Leighton Contractors' compliance records were well organised and complete and the records required to be made available on the dedicated ILC website were available at the time of the audit. The site visit also indicated a high level of implementation of the mitigation measures in the Stage 3 CEMP by Leighton Contractors for works currently underway.

As no non compliances were identified during the Audit, Sydney Ports and contractor (Leighton Contractors) have demonstrated a commendable level of compliance. Notwithstanding this, several opportunities for improvement and an outstanding action in response to a previous audit finding were identified for further consideration and attention as detailed above in sections 2.2 and 2.4.



Plate 4: Mini bus used on site



Plate 5: Speed limit & other warning signage

Table 2- 2011 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	O	The Road Transport Coordination Group (RTCG) Terms of Reference (ToR) requires quarterly meetings to be held however from September 2010 to August 2011 the RTCG agreed to deviate from this schedule.	Consider reviewing ToR for meeting frequency to provide RTCG more flexibility in setting meeting dates	SPC		
2	CoA 2.20	O	Weather station down for 6 months undergoing repairs. Did not greatly impact site management due to availability of data from BoM sites.	Consider measures to reduce periods of down time due to faults or alternatives to current station	SPC		
3	CoA 6.2	O	No evidence of quarterly Leighton Enviro Branch inspections being undertaken on site		LCPL		
4	CoA 6.2	O	2010 Audit Finding. Leighton's Environmental Essentials Training (EET) not implemented due to current review of the program	ERSED training has been substituted for EET training (1 st ERSED training held on 14/7/11). Stage 3 CEMP should be revised to reflect this change.	LCPL		

APPENDIX A: 2011 AUDIT CHECKLIST

MINISTER'S CONDITIONS OF APPROVAL

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
1.1	The Proponent shall carry out the project generally in accordance with the environmental documentation....	Y	<p>Consideration of responsibility for compliance with this condition is indicated by:</p> <ul style="list-style-type: none"> • Modifications 1i) &j) to MCoA 1.1 indicate the scope of the approved works are being periodically reviewed and revised as needed • Appendix H of the Works Brief between Sydney Ports (SP) & Leighton Contractors (LC) dated June 2010 assigns responsibility for each condition to either party
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	No additional requirements to the existing CoA were imposed in the DoPI Stage 3 CEMP approval letter of 20/6/11.
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	SPC Framework CEMP (Sep 2010) available on website
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 Enfield project office.
2.1	The Proponent shall provide a shuttle bus service between Strathfield train station and the site during peak construction works and shall encourage employees to utilise public transport rather than private transport to the site	Y	Project shuttle bus sighted in Enfield project office car park.
2.11	Prior to commencement of any works associated with the construction of connections to the existing freight rail network and the road bridge over the New Enfield Marshalling Yards, the Proponent shall consult with RailCorp to reach agreement on the detailed design and operational aspects of the rail and road infrastructure component of the project on RailCorp land. Design details	Closed	Railway Works Deed executed between SP & Railcorp on 29 October 2010 including details of road bridge (only work relevant to this condition that has commenced on site at time of audit) was sighted

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>shall include a)...h). All works associated with rail and road infrastructure on RailCorp land shall be undertaken in accordance with the agreement reached with Railcorp.</p>		
2.12	<p>The Proponent shall establish and maintain for the life of the project..a Road Transport Coordination Group 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...</p>	O	<p>No minuted meetings of the RTCG held between the meetings on 9/9/10 & 9/8/11 however:</p> <ul style="list-style-type: none"> • A site inspection was held on 12/5/11 and • Meeting scheduled for 24/2/11 rescheduled by agreement (draft agenda for this meeting sighted) <p>Minutes of most recent meeting held on 10/11/11 sighted.</p> <p>RTCG ToR (as agreed at Feb 2010 meeting) requires quarterly meetings.</p>
2.13	<p>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).</p>	Y	<p>Reversing alarms observed on vehicles and mobile plant operating on site on day of site inspection.</p>
2.14	<p>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.</p>	Y	<p>Noise mound has been constructed (Plate 1)</p>
2.15	<p>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</p>	Y	<p>The approved working hours are identified in:</p> <ul style="list-style-type: none"> • Sydney Ports' CEMP Framework Rev 10

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>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.</p>		<ul style="list-style-type: none"> • Stage 2 CEMP: Stage 2 Early Works CEMP • Stage 3 CEMP: Stage 3 Main Construction CEMP <p>The approved construction Hours are communicated to every person working for LCPL on the ILC Enfield Project through the environmental component of LCPL's Project Induction.</p> <p>LCPL requested a number of inaudible works assessments in accordance with the Stage 2 Early Works CEMP. LCPL's Environmental Manager assessed these applications on the basis of AS/NZS 3580.1.1:2007, relevant guidelines and attended onsite monitoring to confirm the works were inaudible. The Inaudible Out of Hours proposals approved by the LCPL's Environmental Manager for this compliance period were:</p> <ul style="list-style-type: none"> • works inside of Building 31; • works inside and out of Building 31; • potholing onsite at Piers 1, 5 & 6 (not used); • crane demobilisation. <p>No audible construction works have been undertaken outside of standard construction hours (excluding DoP approved possession weekends approved under CoA 2.16), as evidenced by attended noise monitoring undertaken by LCPL</p> <p>OOHW associated with track possession carried out over several weekends in February & March 2011 approved by the DG of DP&I. Letter of 1 Feb 2011 approving OOHW sighted.</p>
2.16	<p>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....</p>	Y	

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
2.20	<p>The Proponent shall install, operate and maintain a meteorological monitoring station to monitor weather conditions representative of those on the site, in accordance with:</p> <ul style="list-style-type: none"> 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. <p>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....</p>	O	<p>The weather station underwent a series of repairs from January – June 2011 and was unable to be used. BoM stations at Canterbury Racecourse and Bankstown Airport were relied on during this period</p>
2.21	<p>The Proponent shall not permit any offensive odour, as defined under section 129 of the Protection of the Environment Operations Act 1997, to be emitted beyond the boundary of land owned by the Proponent (the site the subject of this approval).</p>	Y	<p>No offensive odours were detected during site inspection nor were any potential sources of odours that would potentially be emitted beyond the premises boundary observed.</p>
2.22	<p>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 wind blown and traffic generated dust.</p>	Y	<p>Watering carts observed on site (rain on day of site inspection meant these were not in active use at the time). All haul roads have been designed to be internalised within the site to reduce the need for haulage outside the site and many of the haul roads were observed to be sealed or covered with aggregate.</p>
2.23	<p>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....</p>	Y	<p>No heavy vehicles were observed leaving the site on day of inspection.</p>
2.24	<p>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.</p>	Y	<p>Dust control measures are set out in the Stage 1A CEMP and Section 4.1 of LCPL's Air Quality and Dust Management Plan, approved as part of the Stage 2 and Stage 3 CEMPs, contain air quality control measures. Measures to react to significant levels of dust have been identified in LCPL's Air Quality and Dust</p>

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
			Management Plan. Constant visual monitoring is carried out by LCPL's workforce, site supervisors and Environmental Manager. The Environmental Checklists, completed examples of which were sighted, contains a check for visible dust.
2.25	The Proponent shall manage, maintain and use internal haulage roads in order to prevent dust emissions. The measures to be implemented for the management of potential dust emissions from internal roads during construction shall be incorporated in the CEMP required under condition 6.3.	Y	Refer to evidence in 2.22 & 2.24 above.
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	The 20 km/hr speed limit is communicated in LCPL's Project Induction and speed signs are displayed onsite (Plate 5)
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	A wheel wash (& temporary wheel wash) were sighted on the main haul road.
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 Protection of the Environment Operations Act 1997 which prohibits the pollution of waters.	Y	Runoff water from the site – even after heavy rainfall – was not observed to be discharging off site.
2.29	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 Managing Urban Stormwater: Soils and Construction.	Y	References to Bluebook were sighted on Erosion & Sediment Control Plans and plans were observed to be activity updated and utilised.
2.30	All stockpiled construction materials shall be adequately located, stabilised and maintained to prevent erosion or dispersal of the materials.	Y	Some stockpiles observed to be vegetated. Coarseness of material in many stockpiles reduces potential for erosion. No evidence of significant dispersal or erosion of stockpiled material was observed during site inspection.
2.31	The Proponent shall construct and maintain stormwater	Y	Applicable to the operational phase of the project. The Frog Management Plan, available in the project website, provides for the

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>detention basins on the Site, generally consistent with the basin sizes/ locations presented in the document referred to under condition 1.1h) of this approval. Opportunities to reuse stormwater from detention basins for ecological areas or for site operations shall be investigated during detailed design of the project, and where practicable, the Proponent shall utilise collected water preferentially to external potable water supplies for operational activities on the Site, subject to testing to confirm the suitability of collected water quality.</p>		<p>stormwater detention basin to be the main water supply to the frog ponds. Sydney Ports advised that the frog pond system will be connected to the southern stormwater detention basin.</p>
2.32	<p>All quarantine and machinery wash down waters and amenities wastewater shall be directed to sewer (subject to Sydney Water Corporation approval), or to an appropriately licensed liquid waste disposal facility.</p>	Y	<p>Wastewater from the established office (Building 31) and adjacent amenities is directed to sewer. The Bridge Compound and onsite porta-loos are pumped-out by a Waste Contractor and disposed off site.</p>
2.33	<p>The Proponent shall design, install, maintain and operate rainwater tanks for the collection of water for domestic uses on the Site. Collected rainwater shall be used preferentially to external potable water supplies.</p>	NA	<p>Not applicable to current stage of Project</p>
2.34	<p>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...</p>	Y	<p>Tarpaulin Factory retained on site in accordance with requirements (Plate2). Evidence of consultation with Strathfield Council re the future of the Factory sighted in Council's letter to SP of 26 August 2010. In correspondence dated 21 January 2011, Sydney Ports obtained Heritage Office approval to demolish two late additions (annexes) to the Tarpaulin Factory (IC0235). Sydney Ports is understood to be undertaking an options report for the Tarpaulin Factory, which is expected to be completed during 2011/12.</p>
2.35	<p>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.</p>	Closed	<p>Pillar Water Tank relocated in accordance with DoP letter dated 23 July 2010 and located near Tarpaulin Factor (Plate 2).</p>

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
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	See evidence for 2.35. Sydney Ports is planning for final stabilisation 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...	Closed	Photographic record of relocation of Pedestrian Footbridge (at Enfield end) observed during site inspection by this auditor on 2 December 2010. DoP letter of approval dated 25 August 2010 for relocation of footbridge to Dorrigo Steam Rail and Museum sighted.
2.38	The Proponent is permitted to destroy the Yard Master's Office, the Administration Building, and the Wagon Repair Shed (and 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.	Closed	These works have been completed and letter from Heritage Office of 3 November 2008 indicating satisfaction with archival recording was sighted. Strathfield Council letter of 13 November 2008 acknowledging receipt of archival recording was sighted.
2.39	All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials.	Y	Alkene waste tracking is retained by LCPL following disposal of asbestos contaminated materials by Alkene and this documentation was sighted. Alkene letter of 31/8/11 containing copies of delivery dockets for asbestos waste sent to SITA depot at Kemps Creek on 7&8, 11-14 July was sighted. Environment Protection Licence 4068 available on the POEO public register, issued to SITA, permits asbestos waste to be disposed at the Kemps Creek landfill.
2.40	The Proponent shall ensure that all liquid and/ or non-liquid waste generated, stored on the site or disposed of, is assessed and classified in accordance with the Waste Classification Guidelines (DECC 2008).	Y	General Solid (Non-Putrescible) Wastes are collected from site in skip bins by the Waste Contractor, Bingo (Plate 3). Bingo waste management & recycling report of September 2011 was sighted and it indicates wastes are sorted into categories for recycling and estimates are made of quantities.
2.41	The Proponent shall ensure that the transport of any hazardous and/ or industrial and/ or Group A waste from	Y	Refer evidence in 2.39 above

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
2.42	<p>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> <p>The Proponent shall ensure that contaminated areas of the site that are disturbed by construction works associated with the project are remediated prior to the commencement of project operations at these areas. All remediation works shall be undertaken in accordance with the requirements of the Contaminated Land Management Act 1997 and Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (EPA 1997).</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 in previous audits.</p> <p>During 2011, LCPL carried out works in RailCorp land associated with the construction of the vehicular bridge over the Marshalling Yard. Documentation of soil sampling and analysis of excavated material sent to the Site Auditor under CoA 2.42 and 2.43 was observed. The Site Auditor reviewed LCPL documentation and issued a letter dated 20 May 2011 (IC0254) indicating that the areas of the bridge footings and abutment are not located in known contaminated areas and as such a site audit statement was not required. It also indicated that excavated spoil had been appropriately characterised and that footing excavation for piers 4-6 was considered to have been remediated. One stockpile of pier excavated material where a single sample tested positive to asbestos, has been quarantined pending sign-off by the Site Auditor of the management of this material.</p>
2.43	<p>Prior to the commencement of construction works associated with the project that may disturb 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 to be undertaken has been or can be remediated to a standard consistent with the intended land use... A final Site Audit Statement (s), prepared by an accredited Site Auditor, certifying that the contaminated areas have been remediated to a standard consistent with the intended land use is to be submitted to the DG prior to operation of the remediated site/s.</p> <p>The Proponent shall manage any asbestos or asbestos-contaminated materials that may be uncovered during the</p>	Y	<p>Site Audit Statement (Part B) for SP1 dated 19 February 2009, SAS Part B for SP2-SP5 dated 2 July 2009 and SAS Part B for part of SP5 dated 4 November 2009 were sighted in previous audits.</p> <p>Site Audit Report and associated Site Audit Statement (Part B), titled Remediation Action Plan, Slip Lane Construction Zone, Corner Roberts and Norfolk Roads, Greenacre, NSW dated September 2010 prepared by Environ P/L for SP sighted.</p> <p>Also refer to documentation above in 2.42</p>
2.44	<p>The Proponent shall manage any asbestos or asbestos-contaminated materials that may be uncovered during the</p>	Y	<p>Unexpected discoveries of asbestos materials are covered by the</p>

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>construction..in accordance with the requirements under Protection of the Environment Operations (Waste) Regulation 2005 and any guidelines or requirements issued by the DECC in relation to those materials.</p>		<p>Unexpected Finds Protocol, contained in the Soil & Water Management Plan (approved as part of the Stage 2 CEMP). 'Unexpected Find Records' dated 20/10/11 & 8/11/11 were sighted and indicate that procedure is being implemented. Records of unexpected asbestos discoveries and management being issued to the Site Auditor were also sighted in accordance with the protocol.</p>
2.45	<p>The Proponent shall ensure that all structures on the Site are designed, constructed and maintained to maximise, where practicable, the use of natural ventilation and natural lighting, and to minimise energy consumption associated with heating, cooling and lighting.</p>	NA	<p>Not applicable to this stage of the Project</p>
2.46	<p>The Proponent shall ensure that all external lighting installed as part of the project is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting shall be the minimum level of illumination necessary, and be in general accordance with the latest version of AS 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.</p>	Y	<p>OOHW mitigation measures include LCPL's Environmental Manager and/or Site Supervisors checking for light spill to surrounding areas, especially in the direction of residents, during the use of floodlights/ day-makers for evening and night-time construction activities outside of standard hours (refer to CoA 2.15 and 2.16).</p>
2.47	<p>Prior to the commencement of construction of each warehouse associated with the project (refer to Condition 1.6 of this approval), the Proponent shall submit, for the approval of the Director-General, details of the external façade for the warehouse, including demonstration of the façade(s) on an external finishing board. The finishing board shall clearly show the materials to be used for the building façade including details of external treatments of the warehouse (such as painting, and other external features aimed at reducing the bulk of the building and to improve the general appearance of the project). The</p>	NA	<p>Not applicable to this stage of the Project</p>

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	finishing board shall demonstrate that the external treatments of the warehouse are non-reflective and of sufficient design quality to minimise the visual affects of the project, as far as is reasonable and feasible.		
2.48	The Proponent shall implement all of the relevant actions for the site recommended in the Management Plan for the Green and Golden Bell Frog Key Population at Greenacre (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.	Y	<p>DECCW endorsed the Frog Management Plan (FMP) and the design of the Frog Habitat Creation Area (FHCA) in a letter dated 5 May 2010 (IC0198). The FMP was prepared in accordance with this condition. Earthworks for the construction of the frog ponds at the proposed FHCA commenced in early 2011 and were completed in April 2011. The ponds were observed to be completed at the time of the inspection (Plate 1).</p> <p>Section 4.1 of LCPL's Flora & Fauna Management Plan contains controls for the protection of GGBF and GGBF Habitat, in accordance with the Frog Protection Plan (FPP) and Frog Management Plan (FMP). Evidence of frog clearance surveys and special frog induction/presentation to personnel was sighted. Special frog fencing was observed during site inspection.</p>
2.48A	The Proponent shall implement the mitigation measures identified in Section 7.1 of the ILC at Enfield Impact Assessment on Green and Golden Bell Frogs: Addition of Fill Material to Mt Enfield (Biosphere Environmental Consultants Pty Ltd, 2011). These actions shall be incorporated within the Construction Environmental Management Plan (condition 6.2 of this approval) and the Operation Environment Management Plan (condition 6.4 of this approval), as relevant.	NA	Not applicable to works on site at time of audit
2.49	All demolition work shall be carried out in accordance with AS 2601-2001 The Demolition of Structures.	Y	No significant demolition work undertaken since last audit
2.50	The Proponent shall store and handle all dangerous goods ... strictly in accordance with: a) all relevant Australian Standards;	Y	Appropriate bunding and storage of liquid chemicals and fuels was observed during site inspection.

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>b) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and</p> <p>c) the DECC's Environment Protection Manual Technical Bulletin Bunding and Spill Management...</p>		
2.51	The Proponent shall investigate, in consultation with relevant emergency services, whether additional measures are required along Cosgrove Road, including parking restrictions, to ensure clear and safe access to the Site in the event of an emergency	Y	No change in status to this condition since last audit.
2.51A	Prior to commencement of spoil transportation and spoil disposal associated with Mt Enfield requiring the crossing of the Ethylene pipeline, the Proponent shall in consultation with Qenos Pty Ltd, determine truck crossing points of the pipeline and any required works to protect the pipeline.	NA	Not applicable to works on site at time of audit
2.52	Prior to the commencement of operation of the project, the Proponent shall develop in consultation with Strathfield Municipal Council and Bankstown City Council, a Community Enhancement Program to fund...	Y	<p>CEP process outlined in SPC letter to Strathfield Council of 31/3/10.</p> <p>Sydney Ports has received submissions from both Bankstown Council (dated 8 October 2010) and Strathfield Council (IC0195) dated 16 April 2011 nominating possible projects for funding. Evidence was sighted that the Community Enhancement Fund Committee has assessed the submissions and made a recommendation to endorse the proposed projects.</p>
3.1	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 Table 4 ...	Y	The required parameters were observed to being monitored at the BoM stations during the period the onsite weather station was undergoing repairs (Jan-June 2011) and for the remainder of 2011 at the onsite station itself.
3.2	The Proponent shall, from the commencement of soil disturbing works on the site until all large exposed areas	Y	NW Side Dustrak monitor is being continuously operated – this was viewed by auditor via internet access on 17/11/11. The TEOM was

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	have either been landscaped or sealed, continuously monitor ambient dust concentrations (PM10) at two of the most-affected residential receptor(s) to the site (with monitoring undertaken either on the boundary of the site or within the affected residential areas) employing the sampling and analysis methods specified under AM-18 or AS3580.9.8 or as otherwise agreed by the DG. Results of dust monitoring shall be recorded..and shall be utilised for the purpose of site preparation and construction dust management...		vandalised on 12/11/11 however records viewed by auditor via internet access indicated continuous monitoring occurring up to that date. Real time monitoring records from both stations available to Sydney Ports and its contractors during the reporting period. Evidence sighted that dust monitoring results have been utilised for the purpose of dust management under the approved Stage CEMPs during the enabling works carried out during the reporting period. .
3.3-3.9	Noise & traffic auditing conditions related to operational stage of Project	NA	Not applicable to current stage of Project
4.1	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval....	Y	Compliance Tracking Program (August 2008) available on website. SPC Compliance Tracking Report (July 2011) submitted to DoPI sighted and this audit report also satisfies requirements of this condition.
5.1	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	Y	Most documentation available on website and Project Contacts section provides contact details for additional information
5.2	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.	Y	All required contact details are displayed on signs at prominent locations on external site boundary & entry gates and are available on website including telephone, email and postal address and query form
5.3	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...	Y	Project Stakeholder Register (viewed in Aconex project management system) included information required to be recorded by this conditions. Individual enquiry records were observed in the register with the necessary details recorded.
5.4	The Proponent shall establish and maintain a new website, or dedicated pages within its existing website for	Y	ILC Project specific website found at

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
	<p>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...</p> <p>d) the outcomes of compliance tracking in accordance with condition 4.1 of this approval.</p>		<p>http://www.sydneyports.com.au/port_development/enfield</p> <p>& includes the information & documents required by this condition</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 Construction Environmental Management Plan 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 Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and shall include, but not necessarily be limited to....</p> <p>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>Five CEMPs have been approved by the Director-General to date (Stage 1A, 1B, 1C, 2 & 3) with all available on the ILC website.</p>
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) Construction Noise Management Plan b) Construction Traffic Protocol c) Heritage Interpretation Plan & Strategy d) Landscaping & Ecological Area Management Plan e) Construction Dust Management Protocol f) A Mount Enfield Stabilisation Management Plan</p>		<p>Implementation of CEMP was checked via implementation of sample of CEMP mitigation measures – see below</p>
6.4-6.6	<p>Conditions relating to Operational Environmental Management Plan</p>	NA	<p>Not applicable to current stage of Project</p>
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</p>	Y	<p>No significant environmental incidents have occurred at the site according to the Incident Register referred to in CoA 7.2</p>

CoA	Summary of requirement	Compliance status Y/N/Closed	Evidence of implementation
7.2	<p>the Director-General within seven days of the date on which the incident occurred.</p> <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>Incident register sighted and latest incident of 15/9/11 concerning discovery of drums containing unknown liquids was reported by LCPL to Sydney Ports for action. Register indicates the incident not regarded as having actual or potential offsite impacts following advice from Site Auditor.</p>
7.3	<p>The Proponent shall meet the requirements of the Director-General 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.</p>	NA	<p>No incidents reported to DG</p>

STATEMENTS OF COMMITMENTS

SoC	Summary of requirement	Compliance status Y/N	Evidence of implementation
Minimise impacts of ILC on surrounding amenity	<p>CEMP to include (other than those plans required under CoA 6.3):</p> <ul style="list-style-type: none"> • Works on Railcorp land • Soils & contamination • Hydrology & water quality • Waste management (see SoC below) • Energy & water (see SoC below) • Consultation (see SoC below) 	Y	All required elements included in LCPL Stage 3 CEMP or as sub plans to CEMP
Minimise dust emissions during construction	<p>Dust Management Plan to include:</p> <ul style="list-style-type: none"> • Construction of wind breaks • Minimise area of exposed land 	Y	As per above
No increased sedimentation of nearby waterways	Prepare Soil & Water Management Plan consistent with Blue Book	Y	ESCPs sighted during audit include reference to 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	Mound has been installed (Plate 1).
Minimise waste generated and maximise re-use and recycling. Waste disposal to be undertaken when re-use and recycle is not possible	A Waste Management Plan (WMP) would be prepared and implemented. This would include...	Y	Waste, Reuse & Recycling Management Plan included as sub plan in Stage 3 CEMP
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 & Water Management Plan included as sub plan to Stage 3 CEMP
Consultation with community & relevant agencies.	A Consultation Plan would be prepared and implemented. This will include....:	Y	Dec 2009 Community Consultation Plan for main construction sighted.

STAGE 3 CEMP IMPLEMENTATION (LCPL)

CEMP Section	Requirement/mitigation measure	Implemented? Y/N	Comments
12.1.2	Establish Environment Committee & meet at least every 3mths	Y	Safety & Health Committee includes attendance by LCPL Environment Manager & coverage of environmental issues as evidenced by minutes sighted from meetings held on 1/3, 29/6, 27/7 & 31/8.
12.4.1	<ul style="list-style-type: none"> Site Environmental Checklist completed on monthly basis by LCPL's EM & PM LCPL Branch quarterly enviro inspection 	<ul style="list-style-type: none"> Y N 	Checklists dated 14/10 & 14/11 sighted and completed by Environment Manager. No documentary evidence that Quarterly LCPL Branch inspection has occurred
12.4.3	6mthly LCPL internal environmental audits to be undertaken	Y	Audit scheduled for 20/21 December 2011
Soil & Water Mgt Plan s4.1	Erosion and Sediment Control Plan (ESCP) will be developed and implemented in accordance with the 'Bluebook' for works with the potential to cause erosion and sedimentation.	Y	ESCP No23 Rev A & B sighted for works at Norfolk/Wentworth intersection and ESCP No 18 sighted for works in Area A. Plans include reference to Blue Book.
	Re-establish ground cover or stabilise areas that have been disturbed, progressively and once the work is complete	Y	Noise mound stabilised with groundcover & other areas appropriately stabilised.
	Evidence of testing & approval of water discharges by EM under the Water Release Approval Tool	Y	No water discharged off site. All water used internally & Pumping Permit 21/11/11 sighted.
	Reduce the velocity (and erosivity) of run-off by reducing flow lengths through the installation of sandbags, check banks, speed humps and other devices in exposed areas	Y	Sandbags & other controls sighted during site inspection

	Treatment of the captured water will be in accordance with the LCPL procedure for Sediment Basin Flocculation (Appendix C)	NA	No requirement to discharge water off site yet as all water reused for internal operations (eg frog ponds, dust suppression etc)
	Water to be discharged from site is to be treated and tested to meet ANZECC water quality criteria for protection of aquatic ecosystems, that is, no visible oil/grease, NTU <50 and pH 6.5 - 8.5	NA	See above
	All discharges from basins are to be recorded on the Sedimentation Basin Checklist (Appendix D)	NA	See above
	Works in containment cells/capping areas or for any unexpected contamination found during site works are to be managed in accordance with the Contamination Management Plan for Construction (Coffey 2009) (attached in Sydney Ports' CEMPF)	NA	No excavation works within cells undertaken as yet
NVMP s4.1	Non-tonal reversing beepers or smart alarms must be fitted and used on all construction vehicles and mobile plant regularly used on site and for any out of hours work, unless a safety risk assessment requires a tonal beeper	Y	Non tonal reversing beepers on mobile plant – including 4WD – observed during site inspection
	An ongoing programme of inspection and/or testing, undertaken on a risk-based approach, will assess plant and equipment against Australian Standard AS 2436-2010. Where machinery does not comply, investigation into whether it would need to be removed from site, replaced or upgraded with acoustic apertures, mufflers or other mechanical treatment to reduce noise impacts to acceptable levels will be initiated	Y	LCPL Weekly Environmental checklist includes item to check that noise levels of individual plant aren't excessive
TMP s5	All temporary footpaths will be: <ul style="list-style-type: none"> Clearly defined Signposted appropriately to indicate the direction of the footpath Constructed of an all weather surface, free of trip hazards 	Y	Not able to be assessed as works adjacent to footpaths not being undertaken at time of site inspection.

	<ul style="list-style-type: none"> Designed to accommodate the type of pedestrians to be encountered within the area Where required, provided with pram ramps, hand rails and lighting The minimum width specified by the RTA Kept well maintained whilst in operation. 		
TMP s7	<p>Measures to be applied by LCPL include:</p> <ul style="list-style-type: none"> The compulsory covering of all loads prior to leaving the site Provision of suitable wheel cleaning facilities at all major access points; Dust suppression measures conducted regularly at loading / unloading areas and along the routes Haulage vehicle noise and pollution emission will be monitored to ensure they are compliant with the vehicles manufacturer's specifications Clean-up crews, including street sweepers, will be available to manage material spills Internal speed limits of 20 km/hour All materials will be managed in strict accordance of the Project Approval and any subsequent approvals 	Y	Speed limit & other traffic warning signs observed during site inspection. No heavy vehicle traffic leaving/entering site due to rainfall at time of inspection. Street sweeper observed on site along with wheel wash.
Air quality & Dust MP s4.1	<p>Undertake regular watering of active work area, including stockpiles and loads of soil being transported, to reduce wind blown dust emissions and monitor throughout the day</p> <p>Haulage trucks to use sealed or stabilised haul roads where possible when transporting materials on and off site</p>	Y	Water cart observed on site however not in use due to wet weather on day of site inspection. Internal haulage roads sealed and/or stabilised
CoA 3.2	<p>How does LCPL utilise continuous dust monitoring & met info provided by weather stations – especially checking for what happens when >50microgram levels recorded</p> <p>Cover, stabilise or revegetate stockpiles if they are to be left for extended periods, and progressively landscape exposed areas and where material is to remain in situ for a long period of time</p>	Y	LCPL environmental staff log into online dust monitoring site and also nearby OEH monitoring stations to review regional dust levels. Filenote of 27/8/11 & 12/10/11 evidence of this process occurring. Vegetation cover on long term stockpiles sighted.

	All construction vehicles and equipment are to pass through a wheel wash / rumble grid control before entering public roads or onto other completed pavements	Y	Wheel wash on main haul road sighted.
Flora & Fauna MP s4.1	Temporary frog protection fences must be erected around areas of potential GGBF habitat prior to any works being carried out either in or adjacent to these areas	Y	Frog fencing observed during site inspection around identified GGBF habitat areas.
	Prior to any works being carried out within the potential frog habitat areas, frog clearances must be carried out by Sydney Ports' Consulting Herpetologist and a clearance letter issued by the Consulting Herpetologist	Y	Clearances from A White (SPC herpetologist) of 8/9/11 & 20/10/11 sighted. Some minor clearance work being undertaken by LCPL Environment Manager under authority and guidance of A White.
Waste Reuse MP s4.1	Establish a Waste Register to track waste sent off-site, and reuse and recycling on and off-site	Y	Current LCPL WRAPP Register observed and evidence of it being provided to SPC for its reporting needs.
	The transport of any hazardous, industrial or Group A waste from the site will be conducted strictly in accordance with any requirements that may be specified by the DECCW in relation to the transport of those wastes	Y	LCPL using Alkene for transport asbestos wastes. Alkene's licence to transport category 1 & 2 trackable wastes No 7353 sighted on POEO register.
	Any asbestos waste found is to be management in accordance with the specific requirements of the Waste Regulation, other DECCW requirements and safety requirements of the Safety Plan and relevant legislation	Y	Evidence sighted that asbestos waste is bagged on site by licensed contractor and stored in marked bins for disposal to licensed depot (Plate 3)
Energy & Water MP s4.1	Plant Management System to drive efficient use, reductions in amount of fuels (particularly diesel) used and minimising greenhouse gas emissions, e.g. maintenance and servicing to ensure operating as efficiently as possible	Y	Hired in Plant Inspection Report of 2/3/11 addresses these requirements
	A 12 seater van will be provided to ferry people from the nearest railway station to the site during Main Construction	Y	Bus sighted in Project office carpark (Plate 4). Also used for visitor inspections to site.