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# Enfield ILC Overarching Operational Environmental Management Plan

Enfield Intermodal Logistics Centre

NSW Ports | July 2020 | Version 6



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## Revision History

DATE	DETAILS	BY	REVIEW/APPROVED
26/8/14	First draft – project team comments	A Wedgwood	T Brown, M Fahey, DPIE
22/10/14	Second draft following DPIE comments	A Wedgwood	T Brown, DPIE
7/11/14	Third draft approved by DPIE	T Brown	DPIE
30/8/16	V4: First operational review	A Wedgwood	T Brown
27/11/18	V5: Second operational review	A Wedgwood	T Brown
14/7/20	V6: Formal document revision for DPIE	A Wedgwood	DPIE

## Glossary of Terms and Acronyms

TERM	DEFINITIONS
<b>CEMP</b>	Construction Environmental Management Plan
<b>CoA</b>	Condition of Approval
<b>DPIE</b>	Department of Planning, Industry and Environment
<b>EA</b>	Environmental Assessment for the Enfield ILC, SKM, 2005
<b>EP&amp;A Act</b>	NSW Environmental Planning and Assessment Act 1979
<b>EPA</b>	Environment Protection Authority
<b>EPL</b>	Environment Protection Licence issued by the EPA
<b>FHCA</b>	Frog Habitat Creation Area
<b>GGBF</b>	Green and Golden Bell Frog
<b>HIPS</b>	Heritage Interpretation Plan and Strategy
<b>ILC</b>	Intermodal Logistics Centre
<b>LEAMP</b>	Landscape and Ecological Area Management Plan
<b>OEMP</b>	Operational Environmental Management Plan
<b>OTMP</b>	Operational Traffic Management Plan
<b>POEO Act</b>	NSW Protection of the Environment Operations Act 1997
<b>Planning Secretary</b>	Secretary of the Department of Planning, Industry and Environment
<b>Project Approval</b>	The approval granted by the Minister for Planning for Major Project Application 05_0147
<b>RMS</b>	NSW Roads and Maritime Services
<b>RTCG</b>	Road Transport Coordination Group
<b>SAS</b>	Site Audit Statement
<b>SoC</b>	Statement of Commitment
<b>SMP</b>	Site Management Plan referred to under Site Audit Statement



## OEMP Content – Self Verification Checklist

TOPIC	REFERENCE	DETAILS TO INCLUDE	SECTION OF OEMP ADDRESSED
Compliance with DIPNR 2004 Guideline for the Preparation of EMPs	6.4	OEMP to be prepared in accordance with DIPNR 2004 Guidelines for the Preparation of EMPs.	Table 1
Compliance with EA & SoCs	6.4(a)	A framework consistent with Chapter 21 of the EA. Any additional OEMP requirements of: Table 21.1 (over and above those required in CoA 6.2 & 6.3) and Table 4.1 of the Statement of Commitments	Table 1
Description of all activities	6.4(b)	A description of all activities to be undertaken on the site during operation of the project.	Section 1.1 and 1.2.2
Statutory obligations	6.4(c)	Statutory and other obligations that the Proponent is required to fulfil during operation, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies.	Section 1.2 and Appendix A
Consultation requirements	6.4(d)	Specific consideration of measures to address the reasonable requirements of Strathfield Municipal Council, Canterbury-Bankstown City Council and the EPA during operation.	Section 2.7 and Section 2.9.2.
Monitoring	6.4(e)	Details of how the environmental performance of operations will be monitored and what actions will be taken to address identified adverse environmental impacts.	Tables 4-11 and Appendices F, G and H
Roles & responsibilities	6.4(f)	A description of the roles and responsibilities for all relevant employees involved in the operation of the project and a program for how these employees will be trained in responsibilities identified in the plan.	Section 2.2
Complaints handling	6.4(g)	Complaints handling procedures to be applied during operation of the project (conditions 5.2 and condition 5.3 of the approval);	Section 2.3
Sub Plans (see 6.5)	6.4(h)	The issue-specific management plans listed under condition 6.5 of this approval.	Appendix F and G
Sub Plans required	6.5	As part of the Operation Environmental Management Plan for the project, required under condition 6.4 of this approval, the following:	
Operation Noise Management Plan	6.5 (a)	An Operation Noise Management Plan to outline monitoring, management procedures and measures to minimise operational noise impacts associated with the project, including traffic-related noise.	Appendix G
	6.5 (a) i.)	Identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits specified in the approval	Appendix G
	6.5 (a) ii.)	Identification of activities that will be carried out in relation to the project and the associated noise sources	Appendix G
	6.5 (a) iii.)	Assessment of the project noise impacts at the relevant receivers against the noise limits specified under the approval	Appendix G
	6.5 (a) iv.)	Details of management measures, methods and procedures that will be implemented to control individual and overall noise emissions from the site and specific land uses to ensure compliance with condition 2.17	Appendix G

	6.5 (a) v.)	Details of management measures and procedures that will be implemented in Empty Container Storages A and B	Not applicable – covered under the IMT tenant OEMP
	6.5 (a) vi.)	Details of management measures and procedures that will be implemented in Empty Container Storage B	Not applicable – covered under the IMT tenant OEMP
	6.5 (a) vii.)	Details of reactive and pro-active strategies for dealing promptly with any noise complaints	Appendix G
	6.5 (a) viii.)	Noise monitoring and reporting procedures	Appendix G
	6.5 (a) ix.)	Regular internal audits of compliance of all plant and equipment with acceptable design noise	Appendix G
Operation Traffic Management Plan	6.5 (b)	An Operation Traffic Management Plan	Appendix F
	6.5 (b) i.)	A driver education program to ensure that heavy vehicles comply with the requirements of this approval and the commitments made in the documents referred to under condition 1.1, particularly with respect to heavy vehicle routes	Appendix F
	6.5 (b) i-a)	a Driver's Code of Conduct which details traffic management measures to be implemented during operation to: <ul style="list-style-type: none"> <li>· minimise impacts of the project on the local and regional road network,</li> <li>· minimise conflicts with other road users,</li> <li>· ensure truck drivers use specific routes and access points, including no left turn access from Cosgrove Road, and</li> <li>· minimise traffic noise, particularly during night times hours;</li> </ul>	Appendix F
	6.5 (b) ii.)	Movement scheduling where practicable to reduce impacts during sensitive time periods	Appendix F
	6.5 (b) iii.)	Specific measures for ensuring that all heavy vehicle operators associated with the project are aware of and implement the Plan	Appendix F
	6.5 (b) iv.)	A system for identifying and ensuring conformance with the Plan, including conformance monitoring, procedures for implementing and monitoring corrective and preventative action, and penalties for breaches of this Plan	Appendix F
	6.5 (b) v.)	A continuous improvement process for assessing Plan effectiveness and implementing improvements to the Plan	Appendix F
	6.6 (c)	A Long Term Environmental Management Plan, where required to manage interactions with the site as remediated. The Plan must be prepared to the satisfaction of the Planning Secretary, and must: <ul style="list-style-type: none"> <li>(i) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary in consultation with EPA;</li> <li>(ii) be submitted to EPA for review and be approved by the Planning Secretary within one month of the completion of remediation works, unless otherwise agreed by the Planning Secretary; and</li> </ul>	Section 3.3.8

		<p>(iii) include, but not be limited to:</p> <ul style="list-style-type: none"> <li>· a description of the nature and location of any contamination remaining on site;</li> <li>· provisions to manage and monitor any remaining contamination, including details of any restrictions placed on the land to prevent development over the containment cell;</li> <li>· a description of the procedures for managing any leachate generated from the containment cell, including any requirements for testing, pumping, treatment and/or disposal;</li> <li>· a description of the procedures for monitoring the integrity of the containment cell;</li> <li>· a surface and groundwater monitoring program;</li> <li>· mechanisms to report results to relevant agencies;</li> <li>· triggers that would indicate if further remediation is required; and</li> <li>· details of any contingency measures that the Applicant is to carry out to address any ongoing contamination.</li> </ul> <p>Upon completion of the remediation works, the Applicant must manage the site in accordance with the LTEMP and any on-going maintenance of remediation notice issued by EPA under the Contaminated Land Management Act 1997.</p>	
On-going Management of Mt Enfield	6.3 (f)	On-going management of drainage structures and landscaping associated with Mt Enfield	Appendix H
OEMP reviews	6.6	The OEMP required under 6.4 and 6.5 shall be periodically reviewed and maintained, to reflect any phasing of implementation of the project and any operational changes that may be made from time to time.	Section 2.6

# 1. Introduction

## 1.1 Background to Enfield ILC

The Enfield Intermodal Logistics Centre (ILC) site was formerly used by the State Rail Authority of NSW for marshalling and maintenance of rail cars and locomotives, as well as sidings for rail and goods, for over 70 years, from the 1920s until the 1990s.

On 5 September 2007 approval for the construction and operation of the Enfield ILC was granted under Section 75J of the *Environmental Planning & Assessment Act (1979)* by the Minister for Planning, subject to a number of conditions. The Project Approval (MP 05\_0147) as modified, is available at: <https://www.nswports.com.au/enfield-intermodal-logistics-centre>

The approved project includes (but is not limited to) the construction and operation of the following (Figure 1):

- An intermodal terminal for the loading and unloading of containers between road and rail and the short term storage of containers;
- Rail sidings, railway lines and associated works connected to the existing freight line;
- Warehousing for the packing and unpacking of containers and the short-term storage of cargo;
- Empty container storage areas and facilities;
- Light industrial/commercial area fronting Cosgrove Road complementary to operations at the site;
- Access works including the construction of a road bridge over the new marshalling yards for access to Wentworth Street and an upgrade of the entrance to the site from Cosgrove Road;
- Internal roads, administration buildings, diesel and LPG storage and fuelling facilities, container wash down area, vehicle maintenance shed, and installation of site services (all utilities, stormwater and sewerage); and
- Southern Ecological Area (SEA) including Green and Golden Bell Frog (GGBF) ponds and habitat, heritage items and vegetated area.

Condition 6.4 of the Project Approval requires an Operational Environmental Management Plan (OEMP) to be prepared for the approval of the Secretary of Department of Planning and Environment (DP&E) prior to the commencement of operation of the Project.





Figure 1: Layout of Enfield ILC

## 1.2 OEMP Scope

### Project Stages

The ongoing and future development of the Enfield ILC is expected to be carried out in further stages as outlined in the NSW Ports Staging Report 2019 prepared in accordance with CoA 1.3A of the Project Approval.

The majority of operations associated with the future stages of development are expected to be undertaken by tenants who will be required to prepare their own stage specific OEMPs consistent with this Overarching OEMP.

This OEMP fulfils a dual purpose, that is:

- it provides a consistent and overarching framework for the environmental management of all operations on the site, including the activities of tenants; and
- it provides specific operational and maintenance procedures for areas being managed, and maintained by NSW Ports and not covered under the tenants stage specific OEMPs. This includes maintenance on ILC common areas as well as future tenanted lots which are not yet leased to tenants for development and operation. It also applies to the Southern Ecological Area covered under Stage 9.

This OEMP also outlines how NSW Ports will review ILC tenant's environmental documentation and manage leases to ensure ILC tenants are complying with all their relevant environmental obligations.

### Activities Covered Under This OEMP

The Project Approval allows for the operation of an Intermodal Terminal and this overarching OEMP identifies the operational environmental management measures that will be applied to activities undertaken across the site.

The operational activities of tenants at the Enfield ILC shall include:

- Loading and unloading of containers on trains and trucks at the intermodal terminal;
- Rail and road freight operations;
- Packing and unpacking of containers and storage and distribution of cargo in warehouse areas;
- Storage of empty containers to be later packed or transferred to the port or regionally by rail;
- Light industrial / commercial use of land fronting Cosgrove Road;
- Diesel and LPG storage and fuelling facilities;
- Container wash down; and
- Vehicle maintenance.

Hours of operation are 24 hours 7 days per week for the Intermodal terminal, warehousing and container yards.

Operational activities to be managed under this OEMP by NSW Ports or its contractors in common or non-tenanted areas are primarily asset management and maintenance activities. Examples of the types of activities that may be carried out under this OEMP are:

- Tenant management and leasing
- Landscaping:
  - Pest/weed control
  - Vegetation planting
  - Vegetation removal/lopping/pruning
  - Ground maintenance
- Frog Pond maintenance and management
- Detention basin maintenance and management
- Infrastructure Maintenance/Repairs/Replacement including roads, rail, utility services, fire protection systems, drainage, fencing and signage
- Waste management:



- Rubbish/litter control
- Pollution control devices e.g. Gross Pollutant Traps (GPT) management
- Building management, including fire systems and services maintenance
- Dust management on non-tenanted sites
- Heritage management
- Noise Management (overarching site management)
- Traffic Management (overarching site management)
- Site contamination management and associated remediation activities, including implementation of SMPs and temporary contamination controls
- Temporary operational activities similar to the 'operational activities of tenants' described above

It is envisaged that activities will typically be undertaken by contractors on behalf of NSW Ports although some activities may be carried out by NSW Ports' personnel.

### 1.3 OEMP Inputs

This OEMP has been prepared in accordance with the:

- Requirements of CoA 6.4 of the Project Approval (see the Self Verification Checklist on pages 4 & 5);
- Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) (Table 1); and
- Requirements of Table 21.2 of the EIS prepared by SKM in 2005 and Table 4-2 of the Statement of Commitments prepared by SKM as part of the Preferred Project Report (PPR) (Table 1).

**Table 1: DIPNR 2004 EMP & EIS/PPR required content**

DIPNR EMP GUIDELINE REQUIREMENT	WHERE ADDRESSED
Introduction	Section 1
Project description	<b>Section 1.2.2</b>
EMP Context	Section 1
EMP Objectives	<b>Section 1.3</b>
Environmental Policy	Section 1.4 and Appendix B
Environmental management structure & responsibility	<b>Section 2.2</b>
Approval & licensing requirements	Section 1.2 and Appendix A
Reporting	<b>Section 2.4</b>
Environmental training	Section 2.5
Emergency contacts & response	<b>Section 2.7</b>
Risk assessment	<b>Section 3.1 and Appendix E</b>
Environmental management activities and controls	Section and Appendix E
Environmental control plans or maps	<b>Appendix C</b>

Environmental schedules	Appendix D
Environmental monitoring	<b>Tables 4-11 and Appendices F, G and H</b>
Environmental auditing	Section 2.4
Corrective action	<b>Section 2.4</b>
EMP review	Section 2.6
<b>EIS &amp; SoC OEMP requirement</b>	<b>Where addressed</b>
Road Traffic and Transport	Section 3.3.1
Air quality	Section 3.3.3
Chemical Storage & Handling	Section 3.3.10
Hydrology and water quality	Section 3.3.4
Noise and vibration	Section 3.3.2
Heritage	Section 3.3.5
Flora and fauna	Section 3.3.6
Landscape and visual	Section 3.3.9
Waste management	Section 3.3.7
Energy and Greenhouse	Section 3.3.11
Water Consumption	Section 3.3.4
Emergency Response	Section 2.7
Rail Operation	Not relevant to this OEMP – covered under IMT Tenant OEMP
Community Liaison and Consultation	Section 2.8
Environmental Reporting	Section 2.4

## 1.4 Statutory Requirements

### Key Legislation and Other Approvals/Licences

The key legislation and any additional approvals, licences or permits applicable to operational activities being carried out under this OEMP is outlined in the Legislation Register in Appendix A.

### Consultation Requirements

In accordance with CoA 6.2(d) consultation with the EPA on their requirements for the works covered by this OEMP was undertaken in July 2014. Additional consultation with the EPA has not been undertaken on revisions to the document due to the minor nature of updates to the Overarching OEMP and the EPA's prior response that they do not provide approval of such documentation.

## Operational Requirements and Other Approvals/Licences

The details of how any other obligations required under the Project Approval or other approvals and licences have been satisfied prior to operations commencing are outlined in Table 2.

As none of the works covered under this OEMP are listed within Schedule 1 of the POEO Act and it is not expected that any of NSW Ports operations would require any discharge to waters an environment protection licence (EPL) is unlikely to be required.

**Table 2: Other CoA operational obligations**

COA	REQUIREMENT	HOW ADDRESSED
1.3A	The Proponent may construct and/or operate the project in stages with commensurate staging of compliance with the conditions of this approval. Where the project is to be staged, the Proponent shall submit details of the staging to the Director-General, including details of how compliance with the conditions of this approval will be met.	NSW Ports 2019 Staging Report
1.5	The project shall be limited to a maximum throughput of 300,000 TEU per annum, for the rail to intermodal terminal interface and warehousing interface.  Note: For the avoidance of doubt, this does not include internal TEU movements.	Addressed in IMT operators OEMP and Lease conditions.
1.11A	The Proponent shall ensure that operations in the former Toll lease area (also known as Precinct D) are generally consistent with former operations.	Addressed in tenant OEMPs for Precinct D.
2.2	Provide a manual and/or technological solution to control the frequency of articulated and B-double vehicles utilising the Cosgrove Rd entrance to the site during morning and afternoon peak periods.	NSW Ports OTMP and Tenant OTMPs
2.2A	<p>Intermodal operations</p> <p>2.2A The proponent is to provide an Intermodal Freight Transportation Report, prepared by an independent qualified person(s) approved by the Planning Secretary.</p> <p>The purpose of the Intermodal Freight Transportation Report is to detail how the Proponent is working to increase the modal share of rail, and is to include the following:</p> <ul style="list-style-type: none"> <li>a) the number of twenty-foot equivalent shipping containers despatched and received during the period;</li> <li>b) modal splits of container volumes (in TEUs), provided by the warehouse operators and/or the intermodal operators, moved in/out of the project by: <ul style="list-style-type: none"> <li>i. rail-to-truck/truck-to-rail, and</li> <li>ii. truck-to-truck;</li> </ul> </li> <li>c) representative vehicle origins and destinations, based on data from the warehouse operators and/or the intermodal operators;</li> <li>d) review of recorded actual traffic generation against the traffic model referred in, and the findings of, the report titled Traffic Impact Assessment Enfield Intermodal Logistics Centre; Cosgrove Road, Enfield MOD 14 Ref: 0440r03v5 (Ason Group, 26 February 2018);</li> <li>e) a constraints and opportunities analysis to assist with identifying measures to increasing the modal split of container movements via rail to-truck/truck-to-rail; and</li> <li>f) a future forecast outlining expected TEU volume despatched and received on rail, demonstrating how the Proponent is using the opportunities identified above, subject to the constraints identified, to assist with switching the main mode of transport for container TEUs to rail.</li> </ul> <p>The report is to be submitted throughout operation of the project, with the first report to be submitted one year after the commencement of operation of the first warehouse/s permitted as part of the approval of MP 05_0147 MOD 14, unless otherwise agreed by the Planning Secretary. Subsequent reports will be completed and submitted to the Planning Secretary on a two-yearly basis, or as otherwise agreed.</p>	NSW Ports OTMP (Appendix F)
2.2B	<p>A framework for recording and reporting on the data required for the report required under condition 2.2A is to be prepared by an independent qualified person(s) approved by the Planning Secretary, and submitted to the Planning Secretary for approval three months prior to the commencement of operation of any warehouse permitted as part of the approval of MP 05_0147 MOD 14.</p> <p>The Proponent shall prepare the report required under condition 2.2A in accordance with the framework for recording and reporting approved by the Planning Secretary under this condition from time to time.</p>	NSW Ports OTMP (Appendix F)



<b>2.2C</b>	The Proponent is to comply with any reasonable additional operation traffic management measures as directed by the Planning Secretary in consultation with Transport for NSW and RMS following review of any Intermodal Freight Transportation report, Traffic and Capacity Monitoring Program, or Traffic Audit.	NSW Ports OTMP (Appendix F)
<b>2.3</b>	The Proponent shall design, construct and maintain all internal road works, including the associated 816 parking facilities and loading bays for operational areas associated with the ILC, warehouses and light industrial/commercial uses, to meet or exceed the following requirements: a) compliance with the provisions of relevant Australian Standards, RTA standards and guidelines; b) installation of clear signage to demarcate all vehicle movements within the site; c) provision of directional pavement arrows on all internal roads, and line marking and signage to indicate designated truck routes and bays; d) internal roadways wide enough to accommodate through traffic and turning two-way traffic; e) design of site ingress and egress points to ensure that vehicles enter and leave the site in a forward direction; f) installation and maintenance of any landscaping on the site so as not to affect driver sight distance for vehicles entering and exiting the site; and g) clear demarcation of all visitor, disabled, ambulance and service vehicle parking areas.	NSW Ports OTMP and Section 3.3.1
<b>2.12</b>	The Proponent shall establish and maintain for the life of the project, unless otherwise agreed by the Planning Secretary, a Road Transport Coordination Group to oversee and coordinate the management of traffic and road issues affected by the project. The Group shall include representatives of the Proponent, the Department, the RMS, Strathfield Municipal Council and Canterbury Bankstown Council, and shall operate in accordance with terms of reference agreed by those parties at the first meeting(s) of the Group. The Proponent shall bear the full cost of administering the Group.	RTCG currently established & maintained by NSW Ports and Section 2.8
<b>2.14</b>	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 occupational health and safety requirements).	Section 3.3.2
<b>2.17 – 2.19A</b>	Operation Noise Conditions and limits	Section 3.3.2, IMT Tenant OEMP and Appendix G
<b>2.21</b>	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).	Section 3.3.3
<b>2.22</b>	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.	Section 3.3.3
<b>2.28</b>	Except as may be expressly provided under an Environment Protection Licence applicable to the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> which prohibits the pollution of waters.	Noted
<b>2.31</b>	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 conditions 1.1m) and 1.1n) 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.	Maintenance measures included in Appendix H
<b>2.34</b>	Except for the necessary stabilisation works agreed in consultation with the Heritage Office, the Proponent is not permitted to destroy, modify or otherwise physically affect the Tarpaulin Factory as part of this Approval. Any proposal to destroy modify redevelop relocate or otherwise affect the Factory shall be subject to further assessment and approval in accordance with the EP&A Act.	Section 3.3.5
<b>2.39</b>	All waste materials removed from the site shall only be directed to a waste management facility lawfully permitted to accept the materials.	Section 3.3.7
<b>2.40</b>	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).	Section 3.3.7

<b>2.41</b>	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.	Section 3.3.7
<b>2.44</b>	The Proponent shall manage any asbestos or asbestos-contaminated materials that may be uncovered during the construction, commissioning and operation of the project strictly in accordance with the requirements under Protection of the Environment Operations (Waste) Regulation 2014 and any guidelines or requirements issued by the EPA in relation to those materials.	Section 3.3.7
<b>2.46</b>	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.	Section 3.3.9
<b>2.48</b>	<p>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), being:</p> <ul style="list-style-type: none"> <li>a) creation of overwintering habitat as part of the 2 ha improved foraging habitat at the southern end of the site;</li> <li>b) provision of linkages to the former RailCorp ponds; and</li> <li>c) restrictions on the use of herbicides in known frog habitat and attainment of water quality standards for water discharged from the site.</li> </ul> <p>These actions shall be incorporated within both the CEMP (refer to condition 6.2) and the OEMP (refer to condition 6.4) as relevant, including provisions for monitoring the outcomes of these actions and periodically reporting outcomes to the DECC at a frequency agreed with the DECC.</p>	Section 3.3.6 and Appendix H
<b>2.48A</b>	<p>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), supplementary letter of advice dated 10 January 2018 (Biosphere Consultants Pty Ltd, 2011), and the following:</p> <ul style="list-style-type: none"> <li>a) the installation of an exclusion fence to help prevent frogs from entering the construction site;</li> <li>b) the installation of silt fences and silt trapping devices prior to any earthworks, and the use of dust suppression methods throughout construction, to prevent wind-blown dust from entering the frog habitat area;</li> <li>c) the establishment of run-off barriers between the construction areas and the frog habitat area, to prevent accidental spills and/or stormwater waste from entering the frog habitat area;</li> <li>d) the installation of visual screens to minimise light spill into the frog habitat area, from night construction works;</li> <li>e) the demarcation of the frog habitat area as a “no go” area, using barrier bunting and signs that indicate the significance of the area and that the site is off limits to people, machinery and plant equipment;</li> <li>f) the installation of an exclusion fence to help prevent frogs from entering the operational areas;</li> <li>g) the installation of diversion bunds to ensure hazardous liquids can never enter the frog habitat area; and</li> <li>h) the installation of visual screens to minimise light spill into the frog habitat area, from trucks and plant equipment operating throughout the night.</li> </ul> <p>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.</p>	Section 3.3.6 and Appendix H
<b>2.50</b>	<p>The Proponent shall store and handle all dangerous goods (not being unopened, containerised goods), as defined by the Australian Dangerous Goods Code, strictly 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 Bunding and Spill Management.</li> </ul> <p>In the event of an inconsistency between the requirements listed from a) to c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>	Table 7 and Table 10
<b>3.3</b>	Within 90 days of the project reaching annual throughput of 50,000 TEU, 150,000 TEU and 250,000 TEU, and within commencement of operations in Empty Container Storage Area A, or at such other time as may be directed or agreed by the Planning Secretary, and during a period	

	<p>in which the project is operating under normal operating conditions, the Proponent shall undertake a program to confirm the noise emission performance of the project. The program shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) noise monitoring, consistent with the guidelines provided in the New South Wales Industrial Noise Policy (EPA, 2000), to assess compliance with condition 2.17 of this consent;</li> <li>b) methodologies, locations and frequencies for noise monitoring;</li> <li>c) identification of monitoring sites at which pre- and post-project development noise levels can be ascertained;</li> <li>d) details of any complaints received in relation to noise generated by the project;</li> <li>e) an assessment of night-time use of audible alarm systems;</li> <li>f) an assessment of the effectiveness of stacked empty containers as acoustic barriers in Empty Container Storage Area A;</li> <li>g) details of any noise mitigation measures and timetables for implementation;</li> <li>h) a statement of whether the site is in compliance with the noise limits outlined in condition 2.17; and</li> <li>i) recommendations and timetables for implementation for any reasonable and feasible additional measures necessary to ensure compliance with the relevant noise-related conditions of this approval.</li> </ul>	Section 3.3.2 and Appendix G
3.4	<p>Within 28 days of conducting the noise monitoring referred to under condition 3.3 of this approval, the Proponent shall provide the Planning Secretary with a copy of the report. If the noise monitoring report identifies any non-compliance with the noise limits specified under this approval, the Proponent shall detail what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Planning Secretary.</p>	Section 3.3.2 and Appendix G
3.5	<p>Following consideration of the outcomes of the noise audits referred to under conditions 3.3 and 3.4 of this approval, the Planning Secretary may require the Proponent to implement additional noise mitigation, monitoring or management measures to address noise associated with the project. The Planning Secretary may require any or all of the measures proposed by the Proponent in the noise audit report, or other measures considered appropriate by the Planning Secretary (including on-site and off-site acoustic treatments, noise bunding, noise walls or noise attenuation works for plant and equipment) to be implemented. The Proponent shall implement the measures required by the D-G within such period as the Planning Secretary may specify.</p>	Section 3.3.2 and Appendix G
3.6	<p>The Proponent shall develop and implement a Traffic and Capacity Monitoring Program to monitor the throughput and traffic generation of the project. The Program shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) provisions for monitoring the throughput of the project;</li> <li>b) provisions for representative monitoring the traffic generation of the project, with reference to traffic generation as a function of project throughput, type of road transport employed, hours of traffic movements and intended road traffic destinations;</li> <li>c) provisions for periodic monitoring of traffic movements generated by the project in the surrounding road network, with a particular focus on the residential areas of Greenacre to the west of the project, generally between Roberts Road, Boronia Road and the Hume Highway, and principal road transport routes to and from the site; and</li> <li>d) a framework for recording and reporting the outcomes of the Program and a system for considering data generated through the Program.</li> </ul>	Section 3.3.1 and Appendix F
3.7	<p>Within 90 days of the project reaching annual throughput of 50,000 TEU, 150,000 TEU and 250,000 TEU, or as may be directed or agreed by the Planning Secretary, and during a period in which the project is operating under normal operating conditions, a Traffic Audit of the project shall be undertaken by an independent qualified person(s) approved by the Planning Secretary. The Audit shall include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) assessment of the traffic performance of the project against the predictions made in the documents referred to under condition 1.1 of this approval;</li> <li>b) consideration of the results of the Traffic and Capacity Monitoring Program required under condition 3.6 of this approval;</li> <li>c) consideration of the effectiveness of the traffic management measures implemented by the Proponent and the measures required under this approval;</li> <li>d) consideration of traffic-related issues raised by the RMS, Canterbury-Bankstown Council and Strathfield Municipal Council;</li> <li>e) consideration of the traffic-related complaints recorded in accordance with condition 5.3 of this approval;</li> </ul>	Section 3.3.1 and Appendix F

	f) findings and recommendations with respect to the traffic performance of the project and any additional measures that may be required to manage traffic associated with the project.	
3.8	Within 28 days of conducting the traffic auditing referred to under condition 3.7 of this approval, the Proponent shall provide the Planning Secretary with a copy of the audit report. If the audit report identifies any non-compliance with the traffic predictions, principal heavy vehicle routes or local area traffic management measure outlined in the documents referred to under condition 1.1, or specified under this approval, the Proponent shall detail what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Planning Secretary.	Section 3.3.1 and Appendix F
3.9	Following consideration of the outcomes of the traffic audits referred to under conditions 3.7 and 3.8 of this approval, the Planning Secretary may require the Proponent to implement additional traffic mitigation, monitoring or management measures to address traffic associated with the project. The Planning Secretary may require any or all of the measures proposed by the Proponent in the traffic audit report, or other measures considered appropriate by the Planning Secretary (including additional local area traffic management measures or on-site traffic management controls) to be implemented. The Proponent shall implement the measures required by the Planning Secretary within such period as the Planning Secretary may specify.	Section 3.3.1 and Appendix F
5.1	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request	Section 2.8
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):</p> <ul style="list-style-type: none"> <li>a) a telephone number on which complaints and enquiries about construction and operational activities at the site may be registered;</li> <li>b) a postal address to which written complaints and enquires may be sent; and</li> <li>c) an email address to which electronic complaints and enquiries may be transmitted.</li> </ul> <p>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>	Section 2.3
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.</p> <p>The Register shall record, but not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>a) the date and time, where relevant, of the complaint;</li> <li>b) the means by which the complaint was made (telephone, mail or email);</li> <li>c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</li> <li>d) the nature of the complaint;</li> <li>e) record of operational and meteorological condition contributing to the complaint;</li> <li>f) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>g) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</li> </ul> <p>The Complaints Register shall be made available for inspection by the Planning Secretary upon request.</p>	Section 2.3
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:</p> <ul style="list-style-type: none"> <li>a) a copy of the documents referred to under condition 1.1 of this approval, and any documentation supporting modifications to this approval that may be granted from time to time;</li> <li>b) a copy of this approval and each relevant environmental approval, licence or permit required and obtained in relation to the project;</li> <li>c) a copy of each strategy, plan, program and audit required under this approval;</li> <li>d) the outcomes of compliance tracking in accordance with condition 4.1 of this approval.</li> </ul>	Section 2.8
6.1	Prior to the commencement of operation of the project, the Proponent shall nominate a suitably qualified and experienced Environmental Representative(s) for the approval of the Planning Secretary. The Proponent shall employ the Environmental Representative(s) on a full-time	Section 2.3 and IMT Tenant OEMP

	<p>basis, or as otherwise agreed by the Planning Secretary, during the operation of the project. The Environmental Representative shall be:</p> <ul style="list-style-type: none"> <li>a) the primary contact point in relation to the environmental performance of the project;</li> <li>b) responsible for all management plans and monitoring programs required under this approval;</li> <li>c) responsible for considering and advising on matters specified in the conditions of this approval, and all other licences and approvals related to the environmental performance and impacts of the project;</li> <li>d) responsible for receiving and responding to complaints in accordance with condition 5.2 and 5.3 of this approval; and</li> <li>e) given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur.</li> </ul> <p>The Proponent shall notify the Planning Secretary of any changes to that appointment that may occur from time to time.</p>	
7.1	The Proponent shall notify the Planning Secretary 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 Planning Secretary within seven days of the date on which the incident occurred.	Section 2.7
7.2	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 Planning Secretary.	Section 2.7
7.3	The Proponent shall meet the requirements of the Planning Secretary 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 Planning Secretary may agree.	Section 2.7

## 1.5 CEMP Objectives

The objectives of this OEMP are to:

- Ensure that relevant environmental aspects and risks are identified, assessed and appropriate safeguards and controls implemented on-site;
- Describe how site activities are managed effectively to minimise adverse impacts on the environment;
- Identify key environmental roles, responsibilities and governance arrangements;
- Identify suitable environmental emergency preparedness and response procedures;
- Provide details of complaints management procedures;
- Provide details of incident notification and management procedures;
- Meet all requirements of relevant environmental legislation and provide for compliance with the Project Approval; and
- Outline the process to achieve continual environmental improvement.

## 1.6 HSE Policy

This CEMP has been prepared consistent with NSW Ports' HSE Policy (Appendix B) and the relevant requirements of the Policy will be included as part of any NSW Ports contractor inductions.



## 2. Environmental Management

### 2.1 Overall Approach

The general approach to the management and control of environmental impacts of site activities undertaken by NSW Ports and / or its contractors under this OEMP is shown graphically in Figure 2 below. The Risk Assessment and Mitigation Measures Register (Appendix E) provides an indicative risk assessment of the work activities covered by this OEMP and typical mitigation measures and controls that could be implemented to manage the risks to acceptable levels.

Contractors undertaking site activities on behalf of NSW Ports will be required to work under this OEMP but may utilize their own business and risk management systems and processes to develop any necessary site specific safety and environmental management documentation and induction materials taking into account the Risk Register in Appendix E, any relevant mitigation measures and any site / task specific risks that may require other or additional mitigation measures and controls to be applied.

NSW Ports will use the sample checklist in Appendix D to review the compliance of operational activities undertaken at the ILC.

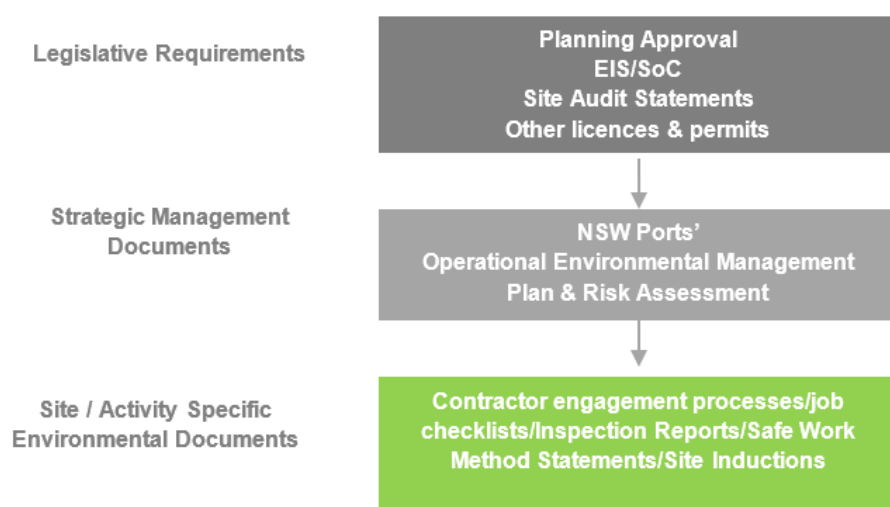


Figure 2: Environmental Management Approach

### 2.2 ILC Tenant Management

ILC tenants are directly responsible for their own environmental performance for operational activities on leased areas. NSW Ports will use reasonable endeavours to ensure tenants comply with all environmental laws, the Conditions of Approval and this OEMP.

Tenant leases include a number of provisions that ensure NSW Ports can fulfil its environmental obligations, including;

- the tenant to prepare an OEMP that complies with NSW Ports' EMP
- the tenant to prepare an Annual Environmental Management Compliance Report – NSW Ports has developed a template for this report to ensure the quality of information from tenants
- the tenant will comply with all environmental laws and standards and ILC Requirements and Guidelines prepared by NSW Ports including the NSW Ports Staging Report, any relevant Site Management Plans/Long Term Environmental Management Plans, this OEMP and other relevant documents
- NSW Ports has a right of entry to inspect the premises and make reasonable investigations to audit the ILC tenants as necessary
- tenants are required to participate in any ILC management committees once established and where requested by NSW Ports.

All management plans that are required to be developed by the tenant for their premises must be consistent and compliant with this EMP. NSW Ports will review the EMPs of tenants against the relevant obligations in accordance with the process outlined in Figure 3. Appendix D provides sample checklists that will be used by NSW Ports to assess the adequacy of tenants EMPs.

ILC Tenants will include internal environmental inspection checklists and procedures as part of the OEMP. ILC Tenants will be required to maintain records of their on-site inspection records and make these available to NSW Ports at any time.

NSW Ports will periodically undertake site visits to tenant facilities based on the level of risk associated with their operations to verify that inspection records are being maintained and environmental actions and mitigation measures are effectively implemented. The checklist template used by NSW Ports for inspection and auditing of tenant operations is included in Appendix D.

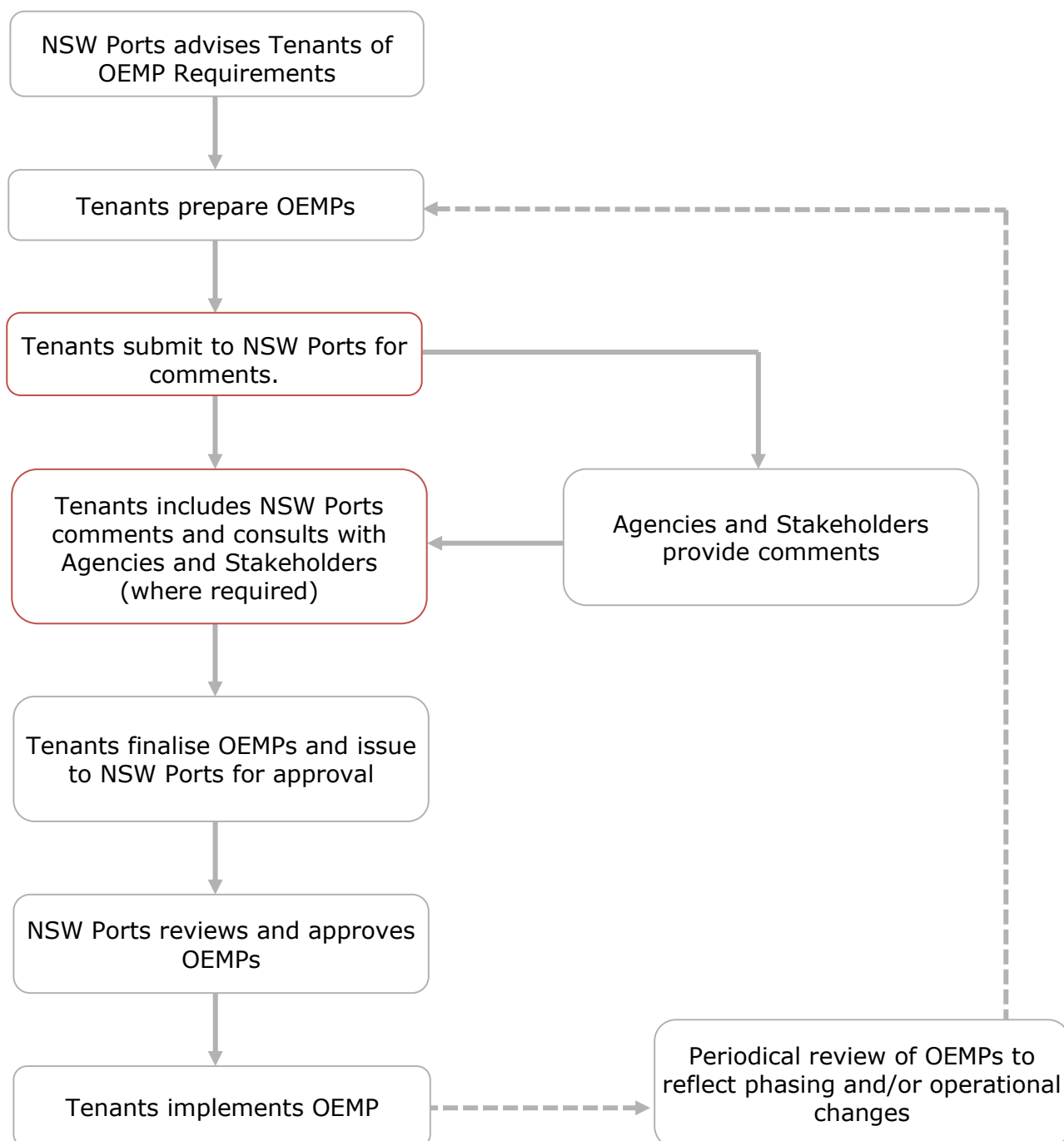


Figure 3 - Environmental Management Plan review process

## 2.3 Roles and Responsibility

### Chief Executive Officer – NSW Ports

The CEO is responsible for ensuring that all operational activities are undertaken in an environmentally responsible and sustainable manner.

### **General Manager, Planning and Infrastructure**

The General Manager, Planning and Infrastructure, is responsible for the management and resourcing of the planning activities for NSW Ports. They are also responsible for the management and resourcing of construction and asset maintenance activities.

### **General Manager, Operations and Environment**

The General Manager, Operations and Environment is responsible for the management and resourcing of the environmental activities for NSW Ports. They are also responsible for incident and emergency response; and supporting staff in the management of environmental risks and implementation of control measures.

Any significant pollution incident must be reported via the HSE & Risk Manager to the General Manager Operations and Environment who will coordinate the response to the incident with the assistance of relevant NSW Ports and contractor personnel.

### **Senior Project Manager**

The Enfield ILC Senior Project Manager is NSW Ports' representative responsible for the overall development and operation of the ILC site and:

- Primary contact point for the Enfield ILC
- Ensuring compliance with the Project Approval conditions
- Reviewing commercial agreements for contractors undertaking activities for NSW Ports to ensure environmental obligations under the CoA are adequately addressed where necessary
- Delivery of environmental inductions and management of induction records.

### **Port Development Manager**

Oversight of asset maintenance activities and application of the relevant sub-plans and point of contact for contractors undertaking works on behalf of NSW Ports.

### **HSE & Risk Manager**

The HSE & Risk Manager (or delegate) is required to manage the environmental obligations of NSW Ports and has the following responsibilities:

- Is the nominated and approved Environmental Representative (ER) for the ILC site excluding the IMT area as required under Condition of Approval 6.1.
- Manage environmental issues associated with common or non-tenanted areas of the ILC.
- Managing the environmental compliance reporting and monitoring processes for NSW Ports
- The implementation of all management and monitoring programs required under the Project Approval
- Considering and advising on matters specified in the conditions of approval and all other licences and approvals related to the environmental performance and impacts of the project
- Managing the environmental induction process for NSW Ports including preparation or approval of induction content
- Ensuring any scheduled environmental inspections, compliance auditing of the implementation of this OEMP and any contractor environmental management documentation occurs as required under this OEMP or the approved Compliance Tracking Program
- Generally responsible for liaising and communications with other ILC tenant's environmental personnel, any tenant Environmental Representative/s for the ILC appointed under CoA 6.1, community and stakeholder representatives where required in relation to compliance with environmental requirements, incidents and complaints and environment and planning related government agencies including local councils.
- Review and improvement of the OEMP
- Reporting any significant incidents to the Planning Secretary of the DPIE.
- Responding to all complaints

The HSE & Risk Manager has the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur.

### Environment and Sustainability Coordinator

Reporting to the HSE & Risk Manager, the Environment and Sustainability Coordinator is required to manage the environmental issues affecting NSW Ports and comply with applicable legislation and has the following responsibilities:

- Is nominated and approved as a back-up ER for the ILC site excluding the IMT area
- Assist the HSE and Risk Manager to develop, implement and maintain this OEMP, including undertaking reviews of the OEMP.
- Review Tenant Operational Environmental Management Plans (OEMP) and contractors Construction Environmental Management Plans (CEMP) risk assessments and SWMS for consistency with the CEMP, OEMP and sub-plans.
- Manage the environmental issues affecting NSW Ports, including impacts of NSW Ports' activities and developments.
- Provide environmental advice to minimise impacts on the community, protect the surrounding environment; and comply with environmental legislation, approvals and reporting requirements, including provision of electronic information via the internet.
- Communicate environmental obligations to relevant internal and external stakeholders.

### Independent Environmental Auditor

A qualified independent Environmental Auditor appointed under the requirements of CoA 4.1(c) will be responsible for undertaking periodic audits of the environmental compliance of the activities undertaken on the ILC site with the Project Approval conditions and any relevant EMPs.

### Enfield ILC Tenants

ILC tenants are directly responsible for their own environmental performance for operational activities on leased areas. It is the responsibility of all tenants to comply with the conditions of their lease or licence and to ensure that their activities do not result in a breach of planning approvals, the *Protection of the Environment Operations Act 1997* and other legislation, where applicable.

Tenants are also required to track their compliance with the relevant Project Approval Conditions and provide an Annual Environmental Compliance Report to NSW Ports which details their compliance status with the Conditions of Approval for inclusion in NSW Ports Annual Compliance Report.

## 2.4 Enquiries and Complaints Response Procedure

This procedure applies to communications directed to NSW Ports' staff and contractors with regards to ILC activities at Enfield. Community/stakeholder complaints and general enquiries could be received through a number of avenues.

Where activities covered by this OEMP are being carried out by contractors on behalf of NSW Ports, they will also be required to also comply with any relevant CoA and this CEMP, and assist in responding to any complaints related to their activities where required by NSW Ports as identified in their commercial agreement.

The contact details for the public to make general enquiries or lodge complaints about operational activities at Enfield ILC are:

- Office Hours (0830 – 1630 Monday to Friday)
- Telephone: 1300 922 524 (NSW Ports switchboard)
- Postal: Enfield ILC HSE & Risk Manager, PO Box 297, Botany NSW 1455
- Email: [enquiries@nswports.com.au](mailto:enquiries@nswports.com.au)

These details are available on a sign near the main entrance to the site in accordance with the requirements of CoA 5.2.

All general queries/complaints will be forwarded through to the HSE & Risk Manager who will respond or disseminate to other staff, tenant or contractors as appropriate. Early resolution to any complaints will be sought, a response provided and effort made to resolve the query/complaint in a timely manner.

### Outside of Office Hours/Emergencies

Out of office hours enquiries that are directed to the NSW Ports switchboard are requested to leave a message which is responded to the following business day. The NSW Ports switchboard recorded message includes an option in the event of an emergency outside of office hours to divert to a port officer who is available 24/7.

All complaints received by NSW Ports will be recorded in NSW Ports Protect Complaints System. The information captured in this register will include:

- date and time of the enquiry or complaint;
- means by which the enquiry or complaint was made (telephone, mail or email);
- any personal details of the individual who provided the enquiry or complaint, or if no details were provided, a note to that effect;
- the nature of the enquiry or complaint;
- record of operational and meteorological condition contributing to the enquiry or complaint;
- any action(s) taken by NSW Ports in relation to the enquiry or complaint; including any follow-up contact with the individual who provided the information or complaint;
- if no action was taken by NSW Ports in relation to the enquiry or complaint, the reason(s) why no action was taken.

Queries and complaints received by NSW Ports relating to specific operational activities will be forwarded through to the relevant NSW Ports personnel, contractor and/or tenant where required.

### **Complaints and Enquiries to Authorities**

Complaints can be made by the public to regulatory authorities such as the EPA and Local Councils. If these complaints are passed onto NSW Ports the relevant personnel will respond, in consultation with any relevant contractor and/or tenant, as required. A response will be provided to the authority in the required timeframe notifying of the action taken to address the complaint and any resolution.

## **2.5 Environmental Monitoring**

It is not envisaged that the limited nature and scope of activities proposed to be carried out under this OEMP would require the establishment of any ongoing environmental monitoring or testing program. Where any monitoring is required to be carried out in response to a complaint or incident, this would be dealt with by NSW Ports and/or the relevant contractor on a case by case basis.

## **2.6 Environmental Inspections**

Environmental inspections of the Enfield site will be undertaken on a quarterly basis by the HSE Team to review compliance with operational site documentation. Such site inspections would identify any corrective / preventative actions required and responsibility and timeline for completion. These actions would be monitored to ensure that they are closed out in the required time frame.

## **2.7 Compliance and Environmental Reporting and Auditing**

Environmental and compliance audits and reporting are to be carried out and reported in accordance with the requirements of NSW Ports' Compliance Tracking Program (CTP) for the Enfield ILC approved under CoA 4.1. The current CTP is provided on NSW Ports website.

NSW Ports will require ILC tenants to produce an Annual Environmental Management Compliance Report which will detail how they have complied with the Project Conditions of Approval and any relevant EMPs.

A full independent environmental audit will be undertaken by a suitably qualified person/team who will audit the Annual Compliance Report, the implementation of any relevant EMPs and NSW Ports activities on site.

The requirement, frequency and timing of Compliance Tracking, Reporting and Environmental Auditing may be changed from time to time in accordance with the provisions of the approved Compliance Tracking Program.

In addition to the procedures required under the NSW Ports' Compliance Tracking Program, NSW Ports will implement a procedure of quarterly internal HSE inspections on the ILC site.

ILC Tenants will include their internal environmental inspection checklists and procedures as part of the OEMP. ILC Tenants will be required to maintain records of their on-site inspection records and make these available to NSW Ports at any time.

NSW Ports will periodically undertake site visits to tenant facilities based on the level of risk associated with their operations to verify that inspection records are being maintained and environmental actions and mitigation measures are effectively implemented. A sample checklist used by NSW Ports for inspection and auditing of tenant operations is included in Appendix D.

### **Records**

NSW Ports, ILC tenants and contractors will be responsible for maintaining legible environmental records to demonstrate compliance with this OEMP, including where relevant:



- All monitoring and inspection reports;
- Internal and external audit reports;
- Reports of pollution incidents, environmental non-conformances and follow-up action;
- Reports of environmental complaints and follow-up action;
- Minutes of management review meetings, and actions required as a result; and
- Induction and training records.

NSW Ports' records are filed electronically on the Enfield ILC Project's drive. ILC tenants will make all relevant records available for inspection by NSW Ports and/or the environmental auditor where necessary.

### Non Conformances and Corrective Actions

Any non-conformances with conditions of approval and/or the OEMP shall be addressed according to the following corrective action process (responsibilities indicated in parentheses):

- Reporting to the HSE & Risk Manager any significant adverse environmental conditions, incidents or trends in the implementation/operation of the OEMP (all NSW Ports staff and contractors);
- Issuing non-conformance notices to initiate action to correct unsatisfactory environmental conditions (HSE & Risk Manager);
- Implementing actions to identify and correct causes of environmental non-conformance in the implementation/operation of the OEMP (NSW Ports staff/contractors as identified);
- Verifying that corrective action has been effected (Enfield Site Coordinator or Environment & Sustainability Coordinator); and
- Recording changes to documented procedures as a result of non-conformances and corrective actions (Enfield Site Coordinator or contractor).

Where actions are required for non-conformances, these are recorded in maintenance and inspection checklists, and OEMP review checklists and put into NSW Ports Protecht system which assigns actions for follow up and close out and includes details of risk assessment and any preventative and corrective actions taken in response.

Tenants shall be required to include a procedure for identifying non-conformance and implementing corrective actions within their OEMPs. All leases on site shall require tenant compliance with the OEMP, including the implementation of corrective actions and reasonable directions from NSW Ports in relation to compliance with the conditions of approval and OEMP requirements.

## 2.8 Induction and Training

NSW Ports and contractor personnel undertaking activities on site are required to satisfactorily complete an Enfield ILC Site Safety Induction.

Site induction/s would typically include (but not be limited to):

- Key issues relating to the Enfield ILC Project and existing environment;
- ILC Sensitive Area Map (Appendix C)
- Location and protection of contaminated material retained on site including capped areas and containment cells
- Key environmental issues, location of sensitive areas and nearest sensitive receivers;
- Incident reporting procedures;
- Environmental protection offences and penalties, and duty to notify of environmental harm; and
- Roles and responsibilities relating to environmental management for the Project.

Attendance records of all induction training sessions will be prepared by the training party (NSW Ports and/or contractor) and submitted to the Enfield ILC Site Coordinator.

All personnel undertaking maintenance activities within the defined Green and Golden Bell Frog Habitat Creation Area will be appropriately trained by NSW Ports Consulting Herpetologist as outlined in the LEAMP (Appendix H) or be accompanied by an appropriately trained person.

Specific environmental training (other than inductions) is not likely to be required for other activities proposed to be carried out under this OEMP. The risk assessment process should identify any specific training needs that would need to be managed by NSW Ports or contractors.

## 2.9 OEMP Review

The OEMP and sub plans will be reviewed after the first 12 months of operations to ensure that it adequately addresses the identified issues. Regular follow up reviews will take place after that when triggered by changes to the Project Approval, audit recommendations, changes to NSW Ports processes or ILC operations. The review will be initiated by the NSW Ports Environment team and will consider as a minimum:

- Modifications to the Project Approval
- Phasing of implementation of the project
- Community feedback
- NSW Ports staff input
- Any agency or Council input/requirements or response from DPIE
- Maintenance/ operational activity details and any subsequent changes
- Environmental monitoring outcomes
- Incidents and non-conformances
- Changes in organisational structure and responsibilities
- Changes in standards and legislation
- All relevant sub-plans

Major updates to the plan (i.e. changes affecting compliance with the CoA) will be issued to the consent authority for approval before adoption of the revised plan by NSW Ports.

Minor updates (i.e. those which do not impact on compliance with the CoA) will be undertaken by NSW Ports as appropriate and updates may include consultation with relevant Authorities, the Enfield ILC Community Liaison Committee and tenants (if needed).

## 2.10 Emergency Response and Incident Management

All significant environmental and pollution incidents shall be reported immediately to the:

- NSW Ports' Port Operations Manager; and
- NSW Ports' HSE & Risk Manager

NSW Ports will 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 will be made available for inspection at any time by the Environmental Auditor or the Planning Secretary of the DPIE.

NSW Ports and ILC tenants will meet the requirements of the Planning Secretary of DPIE to address the cause or impact of any incident as it relates to the ILC project within an appropriate timeframe agreed upon by the Planning Secretary of DPIE.

### Duty to Notify Pollution Incidents

Pollution incidents that harm or are likely to harm the environment will be reported by the relevant contractor's representative or NSW Ports' General Manager Operations to the relevant authorities (see below) in accordance with the *Protection of the Environment Operations Act 1997 – Duty to Notify*.

The following process will be followed for reporting a pollution incident under the Duty to Notify provisions.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- the EPA Environment Line - 131 555

- the local Public Health Unit – 1300 066 055
- the WorkCover Authority – 13 10 50
- Strathfield Municipal Council – 9748 9999
- Fire and Rescue NSW – 1300 729 579

Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.

The Department of Planning, Industry and Environment will need to be notified by the HSE & Risk Manager in accordance with CoA 7.1 as soon as practically possible of any incident with actual or potential significant off-site impacts and then a written report of the incident provided to the Planning Secretary within 7 days.

## Emergency Contact Numbers

Table 3 includes the phone numbers of the relevant government agencies and emergency services that may be required to be contacted during and in response to an emergency.

Table 3: Emergency Contact Numbers

Agency	Phone Number
<b>Emergency</b>	000
<b>NSW Ports – Office Hours</b>	1300 922 524
<b>After hours emergencies – Port Operations Manager</b>	0417 217 274
<b>Police: Emergency</b>	000
<b>Non-emergency – Flemington LAC</b>	(02) 9646 8699
<b>Ambulance: Emergency</b>	000
<b>Non-emergency – Sydney and South East Sector</b>	(02) 9525 5095
<b>NSW Fire and Rescue: Emergency</b>	000
<b>Non-emergency – Burwood Fire Station</b>	(02) 9744 8406
<b>Non-emergency – Met East 3</b>	(02) 9797 7033
<b>Non-emergency – HAZMAT Response Unit</b>	(02) 9742 7320
<b>Environment Protection Authority (EPA)</b>	131 555 (24 hours)
<b>NSW Health</b>	(02) 9515 9420
<b>Camperdown Public Health Unit</b>	(02) 9515 9440 (after hours)
<b>Strathfield City Council</b>	(02) 9748 9999
<b>WorkCover</b>	13 10 50
<b>Sydney Water</b>	13 20 90 (24 hours)
<b>Ausgrid (loss of supply, fallen wires or other electrical emergencies)</b>	13 13 88 (24 hours)
<b>Gas emergencies</b>	13 19 09

## 2.11 Information and Consultation

Subject to confidentiality, NSW Ports will make all documents required under the project approval for the ILC site available for public inspection on request.

NSW Ports will publish and maintain up-to-date information on the project website including, but not necessarily limited to:

- a copy of the documents referred to under condition 1.1 of this approval, and any documentation supporting modifications to this approval that may be granted from time to time;
- a copy of the project approval and each relevant environmental approval, licence or permit required and obtained in relation to the project;
- a copy of each strategy, plan, program and audit required under the project approval;
- the outcomes of compliance tracking in accordance with CoA 4.1 of the project approval.

### Road Transport Coordination Group

As required by CoA 2.12, NSW Ports has established a Road Transport Coordination Group (RTCG) to oversee and coordinate the management of traffic and road issues associated with and affected by the project. The Group includes representatives of NSW Ports, RMS, Strathfield Municipal Council, Canterbury-Bankstown City Council and ILC tenants where relevant.

The Group currently meets quarterly, or as otherwise agreed with the Group and will continue to do so throughout operation of the ILC unless agreed by the Planning Secretary of DPE. The minutes of the RTCG meetings are provided on NSW Ports' website.

### Enfield ILC Community Liaison Committee

The Preferred Project Report (2006) committed to the establishment of a Community Liaison Committee (CLC) to report on construction and operational issues. NSW Ports has established the CLC which includes representatives of NSW Ports, the local community, Strathfield Municipal Council, Canterbury-Bankstown City Council and ILC tenants where relevant.

The CLC is independently chaired and generally meets quarterly. The minutes of the CLC meetings are provided on NSW Ports' website. All reasonable requests and requirements raised by CLC members for the operation of NSW Ports will be minuted, considered and a response provided.

## 3. Implementation

### 3.1 Risk Assessment and Implementation

An environmental risk register for the Enfield ILC Project and a standard suite of environmental mitigation measures and controls have been developed as guidance for the scope of activities likely to be undertaken under this OEMP. These are set out in Appendix E and Section 3.3.

ILC Tenants are required to assess the level of environmental risk for all of their activities and include this risk assessment and proposed mitigation measures in their OEMPs. NSW Ports will review tenant OEMPs to ensure environmental risks are considered and appropriately addressed. Risk assessments are to be reviewed and updated as part of OEMP reviews. Risk assessments will be undertaken prior to commencing any previously unforeseen activities on the site.

### 3.2 Environmentally Sensitive Areas

Environmentally sensitive areas within the ILC include those that could provide or have been created to provide habitat for the endangered Green and Golden Bell Frog (*Litoria aurea*), areas that contain items of heritage interest or value, or areas set aside for ecological/potential community uses.

The environmentally sensitive areas on the ILC site are located in the Southern Ecological Area (refer to Appendix C ILC Sensitive Area Map) and include:

- The Frog Habitat Creation Area (including Frog Ponds) located near Coxs Creek
- The Tarpaulin Shed (land subleased to tenant);
- The Pillar Water Tank (land subleased to tenant); and
- Native grasses and woodland communities on Mount Enfield and surrounds.

Where activities are occurring in, or may otherwise impact on, environmentally sensitive areas this will need to be communicated to personnel and contractors as part of their site induction training and in contractor contracts.

### 3.3 Environmental Aspects and Sub-plans

The identification of relevant environmental aspects and specific sub-plans as required under CoA 6.5 that are specific to the operational phase of the development are discussed below. The OEMP has been prepared in an aspect-based format that nominates for each environmental aspect, the tasks that are required to be addressed during the operational phases of the development, covering where relevant; environmental aspects, environmental objectives, control measures and monitoring requirements. Refer to Appendix E for the risk register of operational activities which will be undertaken under this OEMP.

#### 3.3.1 Road Traffic and Transport

Under CoA 6.5(b), NSW Ports is required to develop an Operational Traffic Management Plan (OTMP). The Overarching OTMP is provided in Appendix F.

This Plan provides the overarching operational traffic management framework for the ILC site and includes measures to minimise and manage traffic impacts from the operation of the ILC on local public roads. Tenant / facility specific operational TMPs will be prepared to be consistent with NSW Ports OTMP and the applicable conditions of approval.

NSW Ports' operational activities covered by this OEMP are not expected to generate significant amounts of traffic with minimal impacts predicted and will be limited to small contractor vehicles undertaking maintenance regimes.

NSW Ports will maintain all common internal roads in compliance with the provisions of relevant Australian Standards, RMS standards and guidelines, including any relevant signage, directional pavement arrows and line marking and roadside and verge landscaping.

NSW Ports will continue to facilitate the RCTG meetings discussed under Section 2.8.1 to address any operational traffic impacts.

Specific mitigation measures to reduce impacts on road traffic and transport for NSW Ports operational activities are outlined in Table 4 below.



TABLE 4 - TRAFFIC MANAGEMENT
<b>Environmental Objectives</b> <p>To promote safety in the use of roads for transporting cargo to and from the ILC.</p> <p>To minimise the impact of ILC-related traffic on other public road users.</p> <p>To ensure compliance with:</p> <ul style="list-style-type: none"> <li>- Road Transport Act 2013</li> <li>- Roads Act 1993</li> <li>- Environmental Planning and Assessment Act 1979</li> </ul> <p>To take reasonable steps to ensure that traffic performance is generally consistent with the projections made in the Enfield ILC Environmental Assessment: Appendix B Traffic Impact Assessment (2005)</p>
<b>Control Measures</b> <p>T1. Ensure traffic management measures are included in Tenant OEMP and sub-management plans where relevant</p> <p>T2. Public roads, internal roads, pedestrian corridors and/or access points are not to be obstructed by any materials, vehicles, trailers, waste skips or the like, under any circumstances.</p> <p>T3. All transport users are to operate on the road system in a safe manner and comply with NSW road traffic regulations within the ILC.</p> <p>T4. All vehicles must give way to any rail rolling stock passing through rail crossings on the site and obey applicable signage including no parking or stopping of vehicles on the level crossing at any time.</p> <p>T5. NSW Ports and its contractors will develop Traffic Control Plans prior to undertaking activities on or affecting an internal road.</p> <p>T6. All transport users are to adhere to the internal road network requirements set out in NSW Ports Operational Traffic Management Plan including speed limits and signage.</p>
<b>Monitoring</b> <ul style="list-style-type: none"> <li>- Traffic and Capacity Monitoring Programme (CoA 3.6) refer to Appendix F</li> <li>- Traffic Auditing (CoA 3.7) refer to Appendix F</li> </ul>

### 3.3.2 Noise and Vibration

Under CoA 6.5(a), NSW Ports is required to develop an Operational Noise Management Plan (ONMP). The Overarching ONMP is provided in Appendix G. It addresses both operational activities undertaken by NSW Ports, as well as management of noise impacts from the whole ILC facility.

Specific mitigation measures to reduce noise impacts from NSW Ports operational activities are outlined in Table 5 below.

TABLE 5 - NOISE MANAGEMENT
<b>Environmental Objectives</b> <p>To minimise operational noise impact on nearby sensitive receptors.</p> <p>To take feasible and reasonable steps to ensure compliance with the following:</p> <ul style="list-style-type: none"> <li>- Protection of the Environment Operations Act 1997</li> <li>- Environmental Planning and Assessment Act 1979</li> <li>- Noise limits specified in Condition 2.17 of the Project Approval</li> </ul>
<b>Control Measures</b>

N1. Ensure noise control measures are included in Tenant OEMP's and sub-management plans where relevant. Review the consistency of proposed tenant operational activities and equipment against that of the relevant Noise Impact Assessment which forms part of the Project Approval.
N2. To minimise noise emissions from ILC related activities: <ul style="list-style-type: none"> <li>- Ensure that all plant and equipment is maintained in an efficient condition and operated in a proper and efficient manner</li> <li>- Utilise acoustically considerate plant and equipment (e.g. non-tonal reversing alarms, compliant exhausts, flashing lights) where possible, in accordance with Work Health and Safety Requirements</li> <li>- Install noise barriers around sources of potentially offensive noise where feasible and reasonable to do so</li> <li>- Scheduling activities to avoid out of hours disturbances</li> </ul>
<b>Monitoring</b>
<ul style="list-style-type: none"> <li>- Noise monitoring/auditing at designated points in accordance with approvals (refer to Appendix G)</li> <li>- Investigative monitoring of noise in response to specific complaints.</li> </ul>

### 3.3.3 Air Quality

NSW Ports' operational activities covered by this OEMP are not expected to generate significant amounts of dust or emissions to air. There may be minor ground disturbance activities associated with landscaping and the repair and maintenance of sealed areas, both temporary and permanent. NSW Ports will ensure the integrity of temporary seals in unsealed lots that are not yet leased to tenants until such time that they are leased.

No activities undertaken under this OEMP are expected to generate offensive odours.

Specific mitigation measures to reduce impacts on air quality for NSW Ports operational activities are outlined in Table 6 below.

TABLE 6 - AIR QUALITY MANAGEMENT	
Environmental Objectives	
To minimise air quality impacts on nearby sensitive receptors.	
To prevent visible emissions of dust beyond the boundary of the site.	
To ensure compliance with the following legislation:	
<ul style="list-style-type: none"> <li>- Protection of the Environment Operations Act 1997</li> <li>- Environmental Planning &amp; Assessment Act 1979</li> </ul>	
Control Measures	
AQ1.	Ensure air quality measures are included in Tenant OEMP's and sub-management plans where relevant.
AQ2.	To minimise exhaust emissions from vehicles, plant and equipment: <ul style="list-style-type: none"> <li>- Ensure that all vehicles, plant and equipment are maintained in an efficient condition and operated in a proper and efficient manner, including that they are turned off when not in use</li> <li>- Support and promote policy initiatives and technologies to improve fuel efficiency and reduce emissions, provided they are feasible, reasonable and equitably applied</li> </ul>
AQ3.	To minimise the risk to human health of disturbing asbestos containing materials: <ul style="list-style-type: none"> <li>- Engage licensed asbestos removal contractors</li> <li>- Wear appropriate personal protective equipment and provide decontamination facilities for exposed workers</li> <li>- Use water sprays, bags and containers to prevent release of fibres</li> </ul>
AQ4.	To minimise the impact of dust and particulate matter from activities involving earthworks/ground disturbance: <ul style="list-style-type: none"> <li>- Minimise the area of disturbance</li> <li>- Apply water to suppress dust as required</li> <li>- Avoid working in dry &amp; windy conditions where possible</li> <li>- Appropriate management of stockpiles, including stabilisation as soon as possible, and disposal when no longer required</li> <li>- Re-vegetate exposed areas with ground cover species where appropriate</li> <li>- Vehicles entering or exiting the site carrying a load that may generate dust shall be covered at all times, except during loading and unloading.</li> <li>- Road sweeping to remove accumulated sediment</li> </ul>

**Monitoring**

- Airborne fibre monitoring in accordance with legislative requirements if undertaking asbestos removal work
- Visual inspection of works and equipment to verify that control measures are in place and functioning correctly
- Visual assessment of dust levels when working in unsealed areas

**3.3.4 Hydrology, Water Quality and Quantity**

NSW Ports has constructed, and will continue to maintain three stormwater detention/water quality basins that service the whole ILC site. Details regarding the operation and on-going maintenance regime of the basins is provided in the LEAMP in Appendix H. The detention basins are operated as bio-retention basins which receive stormwater run-off and filter out pollutants.

All water quality management devices on site, including stormwater basin components will be monitored and maintained at regular intervals to ensure they are functioning as expected (refer to Appendix H).

The on-site drainage system has been designed so that a chemical spill of up to 20,000 litres could be contained within the first flush containment basin. The operation of the ILC facility will result in no significant change in flood levels both upstream and downstream.

NSW Ports activities covered under this OEMP are not expected to have significant impacts on water quality or quantity. Frequent excessive water consumption is not required and NSW Ports has prepared a LEAMP that includes native landscaping that will not require long-term watering.

NSW Ports requires ILC tenants to design water quality and hydrology systems on their premises that incorporate the following principles:

- The management of water quality impacts from the premises during the operation of the facility will include stormwater treatment by medium filtration and stormwater treatment by separation of sediments, oil and grease;
- The design is to comply with NSW Ports environmental requirements and avoid or minimise any potential damage or loss that may result from, or be contributed to by, water discharge from the ILC Site;
- The design of the premises water management system must minimise the maintenance requirements consistent with the need to ensure appropriate water quality discharge from the ILC Site;
- Peak flows from the storms between 2 and 100 years peak events must be mitigated to less than or equal to pre-development levels;
- The drainage system must:
  - preserve the existing elements such as natural channels, wetland and riparian vegetation;
  - manage both the quality and quantity of stormwater as close to its sources as possible, including the installation of devices which treat the stormwater and retain the run-off so that the system changes the existing water regime to the smallest amount practicable;
  - be integrated with the construction process so that the total investment in drainage infrastructure is minimised and access is available to all devices which need on-going maintenance during both the construction phase and the lease period;
  - be capable of being partitioned to contain spillage from incidents;
  - be designed for ease of maintenance; and
  - be structurally safe in any storm.
- Opportunities to reuse stormwater from the premises and rainwater for landscaped areas or for on-site operations must be considered and if appropriate incorporated into the design; and
- All container wash down waters and amenities wastewater must be directed to sewer (subject to Sydney Water Corporation approval), or to an appropriately licensed liquid waste disposal facility.

NSW Ports also requires ILC tenants to design and operate facilities in compliance with NSW Ports Sustainable Development Code when undertaking development, where relevant, to identify opportunities within tenant operations to reduce water usage and conserve resources.

Specific mitigation measures to reduce impacts on water quality for NSW Ports operational activities are outlined in Table 7 below.

TABLE 7 - STORMWATER AND WATER QUALITY MANAGEMENT	
Environmental Objectives	
To avoid detrimental impact on the water quality of Enfield ILC and surrounding areas.	
To comply with the following legislation:	
<ul style="list-style-type: none"> <li>- <i>Protection of the Environment Operations Act 1997</i></li> <li>- <i>Environmental Planning and Assessment Act 1979</i></li> <li>- <i>Marine Pollution Act 2012</i></li> <li>- <i>Work Health and Safety Act 2011</i></li> </ul>	
Control Measures	
WQ1.	Ensure water quality and quantity measures are included in Tenant OEMP's and sub-management plans where relevant, including the investigation of stormwater reuse opportunities such as the use of rainwater tanks on buildings (applicable to Warehouse and Light Industrial sites and admin building of IMT tenant).
WQ2.	To minimise leaks and spills of hazardous substances (e.g. fuels, oils, chemicals) from vehicles and equipment: <ul style="list-style-type: none"> <li>- No refuelling of NSW Ports vehicles or equipment on site</li> <li>- Spill response equipment maintained on site and carried by contractors undertaking activities that may result in leaks and spills</li> <li>- No use of pesticides/herbicides in the Frog Habitat Creation Area</li> <li>- No pesticide/herbicide drift from areas adjoining the Frog Habitat Creation Area</li> <li>- All dangerous goods (not being unopened, containerised goods) will be stored and handled strictly in accordance with all relevant Australian Standards; a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and the DECC's Environment Protection Manual Technical Bulletin Bunding and Spill Management.</li> </ul>
WQ3.	To minimise the sedimentation impacts of activities involving earthworks and/or materials handling: <ul style="list-style-type: none"> <li>- Minimise the area of disturbance</li> <li>- Develop, implement and maintain erosion and sediment control measures in accordance with the Blue Book (i.e. <i>Managing Urban Stormwater: Soils and Construction</i>), including stockpile management</li> <li>- Any ponded or accumulated water from disturbed areas is to be managed to prevent water pollution. This may include settling, infiltration, treatment, on-site re-use, testing or off-site disposal</li> </ul>
WQ4.	To minimise the impact of general run-off and other water discharges: <ul style="list-style-type: none"> <li>- Maintaining stormwater quality improvement devices (e.g. gross pollutant traps, sediment traps) and Scour protection and/or energy dissipation structures at stormwater outlets</li> <li>- All machinery wash down water and amenities wastewater shall be directed to sewer (subject to Sydney Water Corporation approval), or to an appropriately licensed liquid waste disposal facility</li> <li>- No washdown of vehicles/machinery will be undertaken in Ecologically Sensitive Areas (refer to Appendix C).</li> </ul>
Monitoring	
<ul style="list-style-type: none"> <li>- Inspection of detention basins as per the program outlined in Appendix H</li> <li>- Inspection of erosion and sediment control measures</li> <li>- Inspection and cleaning of Gross Pollutant Traps (GPTs)</li> </ul>	

### 3.3.5 Heritage

The two heritage items on the ILC site are the Pillar Water Tank and the Tarpaulin Shed. The locations of the heritage items are shown on the ILC Sensitive Areas Map in Appendix C. These items are listed on NSW Ports' Section 170 Register under the Heritage Act 1977. They are located on land that has been sub-leased to a tenant and are now covered by a separate planning approval.

The Pillar Water Tank was relocated and stabilised in accordance with CoA 2.35 and 2.361 and will continue to be maintained in accordance with the requirements of the NSW Heritage Act 1977 to prevent deterioration. This is the responsibility of the tenant and details will be included in the OEMP for that operation.

<sup>1</sup> CoA 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.

Except for the necessary stabilisation works agreed in consultation with the Heritage Office, NSW Ports will not destroy, modify or otherwise physically affect the Tarpaulin Factory as part of operations under the current Project Approval. Any proposal to destroy, modify, redevelop, relocate or otherwise affect the Factory will be subject to further assessment and a separate planning approval in accordance with the EP&A Act.

NSW Ports will work with the ILC tenant to ensure relevant heritage obligations are captured in appropriate management plans and will inspect the heritage items every two years in accordance with the review of the Section 170 Heritage Register listing.

### 3.3.6 Flora and Fauna

The majority of the ILC site is paved concrete areas and internal roadways and hence very little fauna and flora remain on the site. The southern end of the ILC site has been designated as an ecological area and contains Mt Enfield, a vegetated mound, revegetation with elements of the Cumberland Plains Woodland Endangered Ecological Community, the Coxs Creek Floodplain and the Frog Habitat Creation Area (FHCA) as potential habitat for the endangered Green and Golden Bell Frog (GGBF).

As per the DECC Management Plan for the Green and Golden Bell Frog Key Population at Greenacre (2007), NSW Ports constructed the FHCA, which contains 2ha of improved foraging habitat, including overwintering areas, three frog ponds and a frog corridor that provides linkages to the former RailCorp ponds located outside the ILC site.

On-going management, maintenance and monitoring of the FHCA is provided in the LEAMP in Appendix H. NSW Ports HSE & Risk Manager and the landscape contractors responsible for the maintenance of the FHCA have received appropriate training regarding the correct handling and transport of GGBF.

Specific mitigation measures to reduce impacts on flora and fauna for NSW Ports operational activities are outlined in Table 8 below and are in accordance with CoA 2.48A.

TABLE 8 – FLORA AND FAUNA MANAGEMENT	
Environmental Objectives	
To minimise impacts on the flora and fauna of the Enfield ILC.	
To ensure compliance with the following legislation:	
<ul style="list-style-type: none"> <li>- <i>Threatened Species Conservation Act 1995</i></li> <li>- <i>National Parks and Wildlife Act 1974</i></li> <li>- <i>Noxious Weeds Act 1993</i></li> <li>- <i>Local Land Services Act 2013</i></li> <li>- <i>Environmental Planning and Assessment Act 1979</i></li> <li>- <i>Environment Protection and Biodiversity Conservation Act 1999</i></li> </ul>	
To maintain habitat for Green and Golden Bell Frogs in accordance with <i>Best practice guidelines: Green and golden bell frog habitat</i> (DECC, 2008)	
Control Measures	
FF1.	Ensure flora and fauna measures are included in Tenant OEMPs and sub-management plans where relevant.
FF2.	To minimise the impact of site-based activities on flora and fauna:
<ul style="list-style-type: none"> <li>- Assess the impact of the activity on flora/fauna before carrying out the activity</li> <li>- Make staff and contractors aware through inductions, hazard notices and/or signage of ecologically sensitive areas (e.g. threatened species habitat)</li> <li>- Avoid disturbance of ecologically sensitive areas, where practicable. Where disturbance of sensitive areas is required, undertake 7-part significance test, keep disturbance to a minimum, and, where practicable, schedule works for period least likely to cause harm (e.g. winter)</li> </ul>	
FF3.	To conserve GGBF habitat:
<ul style="list-style-type: none"> <li>- Maintain constructed breeding and foraging habitats</li> <li>- Implement the actions described in the Frog Management Plan (2010) for the Enfield frog ponds and the ILC at Enfield Impact Assessment on Green and Golden Bell Frogs: Addition of Fill Material to Mt Enfield (2011)</li> </ul>	

CoA 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. The Proponent shall consult with the NSW Heritage Office prior to undertaking any stabilisation works to ensure that the works do not adversely affect the heritage values of the item.



	<ul style="list-style-type: none"> <li>- Install and maintain exclusion fencing and appropriate signage around the frog habitat area to ensure that the site is off limits to people, machinery and plant equipment and keep frogs out of operational areas;</li> <li>- Install diversion bunds where required to ensure hazardous liquids can never enter the frog habitat area once nearby operational areas are constructed</li> <li>- Install visual screens where required to minimise light spill into the frog habitat area, from nearby trucks and plant equipment operating throughout the night.</li> <li>- Implement frog hygiene protocols (refer to LEAMP in Appendix H)</li> <li>- Report any sightings in operational areas to Office of Environment &amp; Heritage</li> <li>- The north-south haul road to Mt Enfield will be inspected after all rainfall events and any GGBF found relocated to the frog ponds by the Enfield Site Coordinator</li> <li>- Dust suppression, will be used during the ground disturbance activities at Mt Enfield to prevent wind-blown dust from reaching the FHCA and adjoining areas</li> <li>- Soil, or vehicles that have been transporting soil or moist material from elsewhere on the ILC site are not permitted in the FHCA. The boundary fence separating the FHCA from the remainder of the site and signage will be regularly inspected and maintained.</li> <li>- Members of the public will be restricted from entering the FHCA without an NSW Ports representative</li> </ul>
FF4.	<p>To control noxious weeds (e.g. bitou bush, lantana) and terrestrial pest species on ILC land:</p> <ul style="list-style-type: none"> <li>- Undertake weed control in accordance with the requirements of the Noxious Weeds Act</li> <li>- Implement appropriate pest eradication programs, in consultation with NSW Ports' Herpetologist to ensure that the proposed measures are appropriate and do not have an impact on potential GGBF.</li> </ul>
FF5.	<p>To promote the establishment of native vegetation on the site:</p> <ul style="list-style-type: none"> <li>- Retain existing native vegetation where possible</li> <li>- Landscape plantings will consist of local endemic species</li> <li>- Vegetation will be inspected and maintained as per the regimes outlined in the NSW Ports LEAMP (Appendix H)</li> </ul>
<b>Monitoring</b>	
	<ul style="list-style-type: none"> <li>- Visual inspection and surveys of GGBF habitats as outlined in the LEAMP (Appendix H)</li> <li>- Visual inspections of vegetated/ecological areas for weed and pest incursions and vegetation health as outlined in the LEAMP (Appendix H)</li> <li>- Predator inspections during the landscaping and revegetation phase of the works. If the incidence of birds likely to attack GGBF, notably ibis and heron, increases as a result of the revegetation, bird deterrent methods may need to be used to prevent predation of any potential GGBF in the FHCA.</li> </ul>

### 3.3.7 Waste Management

Appropriate waste facilities will be established for NSW Ports operated buildings, including recycling services. Regular inspections for litter and other waste materials will be undertaken in common areas and NSW Ports maintained lots as per the maintenance regime outlined in the LEAMP (Appendix H). NSW Ports' operational activities are not expected to result in the storage and/or transport of any hazardous waste.

Specific mitigation measures to reduce waste impacts for NSW Ports operational activities are outlined in Table 9 below.

TABLE 9 - WASTE MANAGEMENT	
Environmental Objectives	
To minimise waste generated at the site and reduce the volume of waste requiring disposal to landfill.	
To prevent contamination through unlawful disposal of waste from the site to receiving environments, e.g. adjacent land and waterways	
To ensure compliance with the following legislation:	
<ul style="list-style-type: none"> <li>- <i>Protection of the Environment Operations Act 1997 and Regulations</i></li> </ul>	
Control Measures	
WM1.	Ensure waste management measures are included in Tenant OEMP's and sub-management plans where relevant.

WM2.	Waste is managed in accordance with the following principles: <ul style="list-style-type: none"> <li>- Waste minimisation will occur according to the hierarchy of avoidance, reuse, recycle and disposal. Where possible, recyclable waste will be segregated and sent to appropriate facilities for recycling</li> <li>- Any waste destined for off-site reuse will be characterised and supplied in accordance with the terms of a Resource Recovery Exemption.</li> <li>- Any waste destined for off-site disposal will be classified in accordance with the EPA Waste Classification Guidelines (DECC, 2008) prior to disposal at an appropriately licensed facility.</li> <li>- Any asbestos or asbestos contaminated materials that may be uncovered during operations will be dealt with in accordance with the requirements under the Protection of the Environment Operations (Waste) Regulation 2005 and any guidelines or requirements issued by the Office of Environment and Heritage in relation to those materials.</li> </ul>
WM3.	To manage wastewaters discharged to sewers: <ul style="list-style-type: none"> <li>- Washdown waters, bund waters and other trade wastes will be treated and discharged in accordance with trade waste agreements</li> <li>- Private sewerage infrastructure will be maintained in proper and efficient condition to ensure system integrity and minimise overflows.</li> </ul>
<b>Monitoring</b>	
	<ul style="list-style-type: none"> <li>- Waste classification/characterisation testing to meet EPA requirements</li> <li>- Inspection of on-site wastewater treatment and sewerage infrastructure</li> </ul>

### 3.3.8 Contamination

Contaminated soils and materials (mainly low level asbestos impacted soils and materials) have been safely secured on areas of the Enfield ILC site under clean capping layers and pavements and purpose built containment cells (for smaller quantities of more highly impacted material).

Remediated areas of the Enfield ILC site have been (or will be) certified by the Site Auditor appointed under the Contaminated Land Management Act 1997 as being suitable for commercial / industrial use prior to any operations occurring in remediated areas (as required under CoA 2.432). Areas that have been capped and are subject to final Site Audit Statements (SAS) issued by the Site Auditor that may be subject to activities being undertaken by NSW Ports under this OEMP are shown on the ILC Sensitive Area Map in Appendix C and listed below:

- Southern Precinct (Mount Enfield and Frog Ponds)
- Parts of the internal roads
- Basin F
- Warehouses A, B, D, E & F
- Containment Cell A within the Wheel Lathe Rail Corridor (Lot 15)

Any activities that may be carried out in these areas will be subject to the conditions imposed under the SASs for these areas, including any Site Management Plans or Long Term Environmental Management Plan referred to in the SASs and the Project Approval. The following SMPs currently apply to the Enfield ILC site:

- IMT Area (Final) v2 22 October 2013
- ECSA A (Final) v2 22 October 2013
- Warehouses A & B, Lot 6 January 2014
- Area D January 2014
- Area E January 2014
- Area F January 2014

<sup>2</sup> CoA 2.43 – 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 Director-General a Site Audit Statement(s) prepared by an accredited Site Auditor under the Contaminated Lands Management Act 1997, 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 Director-General prior to operation of the remediated site(s).

- Internal Roads and Basin F September 2014
- Warehouse C, Admin Area and Basin B, November 2014
- Southern Precinct February 2016

New Long Term Environmental Management Plans are being prepared in accordance with CoA 6.5(c) for new development areas as they are completed under future stages. NSW Ports will ensure that any activities undertaken in the areas under NSW Ports' responsibility will adhere to the relevant Site Management Plan/Long Term Environmental Management Plan. NSW Ports will review the requirements of the Site Management Plans/Long Term Environmental Management Plans in all other tenanted areas and ensure that the site is being operated in accordance with the LTEMP and any on-going maintenance of remediation notice issued by EPA under the Contaminated Land Management Act 1997.

Specific mitigation measures to reduce contamination impacts for NSW Ports operational activities are outlined in Table 10 below.

TABLE 10 - SOIL QUALITY AND CONTAMINATED LAND MANAGEMENT	
<b>Environmental Objectives</b>	
<p>To control and prevent soil erosion.</p> <p>To avoid contamination of the soil and groundwater.</p> <p>To reduce potential exposure to existing contaminated soil and groundwater.</p> <p>To comply with the following legislation:</p> <ul style="list-style-type: none"> <li>- <i>Protection of the Environment Operations Act 1997</i></li> <li>- <i>Contaminated Land Management Act 1997</i></li> <li>- <i>Environmental Planning and Assessment Act 1979</i></li> </ul>	
<b>Control Measures</b>	
<p>L1. Ensure soil quality and contamination measures are included in Tenant OEMPs and sub-management plans where relevant</p> <p>L2. Review baseline contamination data at the commencement and conclusion of tenant leases to identify contamination by tenants and remediation requirements</p> <ul style="list-style-type: none"> <li>- To minimise contamination as a result of vehicle or machinery operations or storage of fuels/chemicals/oils:</li> <li>- Operating procedures and control systems to minimise the risk of fuel and oil spillage from vehicles, plant and equipment</li> <li>- Spill response equipment present where relevant</li> <li>- All dangerous goods (not being unopened, containerised goods) will be stored and handled strictly in accordance with all relevant Australian Standards; a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and the DECC's Environment Protection Manual Technical Bulletin Bunding and Spill Management.</li> </ul>	
<p>L3. To minimise exposure to contaminated soil and/or groundwater during excavation/earthmoving activities:</p> <ul style="list-style-type: none"> <li>- Where signs of potential contamination (e.g. staining, odour, fibre cement fragments) are found, work will cease and a suitably qualified and experienced consultant will be engaged to assess contamination and advise on safe working practices. Appropriate identified management measures will be implemented.</li> <li>- Ensure that imported fill and pavement material is either Excavated Natural Material (ENM), or is applied in accordance with a Resource Recovery Exemption</li> <li>- Excavation and ground disturbance activities will be undertaken in accordance with Site Management Plans (refer information above) and Contamination Management Plans where relevant</li> </ul>	
<p>L4. To remediate contaminated land following spill incidents:</p> <ul style="list-style-type: none"> <li>- Assess contamination and develop remediation action plan</li> <li>- Implement remediation action plan</li> <li>- Verify contaminant removal or remediation to meet clean-up criteria</li> <li>- Appropriate disposal of any contaminated soil or water will be undertaken in accordance with OEH waste management guidelines</li> </ul>	
<b>Monitoring</b>	
<ul style="list-style-type: none"> <li>- Visual inspection of ground material during earth moving activities</li> </ul>	

### 3.3.9 Landscape and Visual

NSW Ports and its tenants shall ensure that all external lighting and light fittings are mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting will 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. Should any complaints regarding lighting be received, NSW Ports will investigate, or require its tenant to investigate, additional screening/shrouding opportunities. NSW Ports has developed a Landscape and Ecological Area Management Plan (LEAMP) provided in Appendix H which outlines the landscape treatments for the site. Tenants will be required, where relevant, to incorporate measures regarding lighting and landscaping in their OEMPs that are consistent with the measures described above.

### 3.3.10 Hazardous Substances and Dangerous Goods

All hazardous substances and dangerous goods handled as part of Enfield ILC operations shall be managed to ensure:

- a. compliance with the Australian Dangerous Goods Code;
- b. compliance with all relevant Australian Standards, including:
  - i.) AS 1940 2004: The Storage and Handling of Flammable and Combustible Liquids
  - ii.) AS 4452 1987: The Storage and Handling of Toxic Substances
- c. where bunding of liquid storage facilities is required, provision of a minimum bund volume of 110% of the volume of the largest single stored volume within the bund; and
- d. compliance with the DECC's Environment Protection Manual Technical Bulletin Bunding and Spill Management.

In the event of an inconsistency between the requirements listed from a) to d) above, the most stringent requirement shall prevail to the extent of the inconsistency.

NSW Ports operations covered by this OEMP are not expected to require the handling and storage of chemicals. Minor amounts of chemicals may be used on site during maintenance and landscaping works.

NSW Ports will ensure that the Intermodal Terminal operator implements operating procedures for the management of dangerous goods through the terminal. The management plan will address any load/unload procedures/precautions/priorities, storage areas, separation of different classes and in some cases separation from boundaries and other tenants/leased areas, bunding/drainage/spillage containment, times on site, damaged or leaking containers, fires, planning (pre-arrival notification, and pick up/removal by road vehicle from site or rail delivery to/from the port).

Any warehouse tenant that proposes to undertake packaging, repackaging or decanting of dangerous goods must first prepare and submit a risk assessment of such operations for the approval of the Department of Planning and Environment in accordance with CoA 1.7. The risk assessment shall be undertaken in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DUAP, 1997) and Multi-Level Risk Assessment (DUAP, 1997).

Dangerous goods handling in the commercial / light industrial areas of the site will require a consideration of the requirements of CoA 1.103 for the preparation of a Hazard Analysis as applicable.

Tenants will be required, where relevant, to incorporate measures regarding hazardous substances and dangerous goods in their OEMPs that are consistent with the measures described above.

### 3.3.11 Energy and Greenhouse

NSW Ports operations are not expected to require significant amounts of energy. Where possible, NSW Ports will identify opportunities to minimise energy consumption on site through the use of energy efficient lighting systems and the proper and efficient use of equipment and machinery on site. Any energy management measures would be consistent with Strathfield Council's DCP No 27 – Industrial Development. NSW Ports requires ILC tenants to comply with NSW Ports Sustainable Development Code as a part of their development to identify opportunities within tenant operations to reduce energy and conserve resources.

<sup>3</sup> No component of the light industrial/commercial area is permitted to store, handle or transfer dangerous goods above the thresholds specified in Applying SEPP 33 (DUAP, 1994) (i.e. characterisation of such development as "potentially hazardous development" as defined under State Environmental Planning Policy No. 33 – Hazardous and Offensive Development), unless and until the Proponent has submitted a Hazard Analysis for the approval of the Director-General. The Hazard Analysis shall be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DUAP, 1997) and Multi-Level Risk Assessment (DUAP, 1997). Operation of each relevant component of the light industrial/commercial area shall not operate until the Director-General's approval of the applicable Hazard Analysis has been issued (if required under this condition).

# Appendix A: Legislation Register



<b>Environmental Law</b> <ul style="list-style-type: none"> <li>Subordinate Legislation</li> </ul>	<b>Relevant Requirements</b>
<b>NSW Environmental Planning and Assessment Act 1979</b> <ul style="list-style-type: none"> <li><i>Environmental Planning and Assessment Regulation 2000 (Regs)</i></li> <li><i>State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD)</i></li> <li><i>State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP)</i></li> <li><i>Other State Environmental Planning Policies as applicable to development (i.e. SEPP 33, SEPP 55, Infrastructure SEPP)</i></li> <li><i>Strathfield Local Environmental Plan 2012 (LEP)</i></li> </ul>	<ul style="list-style-type: none"> <li>Requirements under relevant legislation for exempt development (Part 4, Div 1 of Act; LEP and Codes SEPP)</li> <li>Environmental impact assessment to accompany development applications (Part 4 of Act; cl 50 and Part 1 of Schedule 1 of Reg)</li> <li>Information to accompany an application for a complying development certificate (cl 126 and Part 2 of Schedule 1 of Reg) and requirements under relevant legislation for complying development (LEP and Codes SEPP).</li> <li>Duty to consider environmental impact for activities which do not require consent (Part 5 of Act and cl 228 of Reg)</li> <li>Applications for approval of State Significant Infrastructure (s 115X of Act; cl 192-193 of Reg; Part 3 of SEPP SRD)</li> <li>Applications for approval of State Significant Development (s 89C – 89L of Act; cl 50 and Part 1 of Schedule 1 of Reg; Part 2 of SEPP SRD)</li> </ul>
<b>NSW Protection of the Environment Operations Act 1997</b> <ul style="list-style-type: none"> <li><i>Protection of the Environment Operations (General) Regulation 2009</i></li> <li><i>Protection of the Environment Operations (Clean Air) Regulation 2010</i></li> <li><i>Protection of the Environment Operations (Noise Control) Regulation 2017</i></li> <li><i>Protection of the Environment Operations (Waste) Regulation 2014</i></li> </ul>	<ul style="list-style-type: none"> <li>Requirements to hold a licence for scheduled development and scheduled activities (Part 3.2)</li> <li>Requirement to comply with licence conditions (s64)</li> <li>Publication of results of monitoring (s66(6))</li> <li>Prohibition of wilful or negligent disposal of waste causing environmental harm (s115)</li> <li>Prohibition of wilful or negligent leak, spill or escape of substance causing environmental harm (s116)</li> <li>Prohibition of wilful or negligent emission of controlled ozone depleting substance causing environmental harm (s117)</li> <li>Prohibition on polluting waters (s120)</li> <li>Requirements to prevent air pollution (Part 5.4)</li> <li>Requirements to prevent noise pollution (Part 5.5)</li> <li>Prohibition on polluting land (s142A)</li> <li>Prohibition on transport of waste to an unlawful facility (s143)</li> <li>Prohibitions on littering (Part 5.6A)</li> <li>Duty to notify pollution incidents (Part 5.7)</li> <li>Duty to prepare and implement pollution incident response management plans (Part 5.7A)</li> <li>Requirements relating to asbestos waste (Part 7 of Waste Reg)</li> </ul>
<b>NSW Contaminated Land Management Act 1997</b>	<ul style="list-style-type: none"> <li>Duty to report contamination (s60)</li> <li>Requirements for Site audits (Part 4)</li> </ul>
<b>NSW Biodiversity Conservation Act 2016</b> <ul style="list-style-type: none"> <li><i>Biodiversity Conservation Regulation 2017</i></li> </ul>	<ul style="list-style-type: none"> <li>Prohibition of harm to threatened or protected animal (s2.1)</li> <li>Prohibition of picking a threatened or protected native plant (s2.2)</li> <li>Prohibition of damaging declared areas of outstanding biodiversity value (s2.3)</li> <li>Prohibition of damage to habitat of threatened species, endangered populations or endangered ecological communities (s2.4)</li> </ul>

	<ul style="list-style-type: none"> <li>• Prohibition of dealing in threatened or protected plant or animal (s2.5)</li> <li>• Prohibition of liberating animals without authority (s2.6)</li> </ul>
<b>NSW National Parks and Wildlife Act 1974</b> <ul style="list-style-type: none"> <li>• <i>National Parks and Wildlife Regulation 2009</i></li> </ul>	<ul style="list-style-type: none"> <li>• Prohibition on harming or desecrating Aboriginal objects and Aboriginal places (s86)</li> <li>• Prohibition on damaging reserved land (s156A)</li> </ul>
<b>NSW Heritage Act 1977</b> <ul style="list-style-type: none"> <li>• <i>Heritage Regulation 2012</i></li> </ul>	<ul style="list-style-type: none"> <li>• Prohibition on movement, damage or destruction of historic shipwrecks (s51)</li> <li>• Effect of interim heritage orders and listing on State Heritage Register (s57)</li> <li>• Minimum standards of maintenance and repair (incl inspections) for heritage items (Part 6, Div 5 of Act; Part 3 of Reg)</li> <li>• Requirement to establish and maintain Heritage and Conservation Register (s170)</li> <li>• Requirements for heritage management by government instrumentalities (s170A)</li> </ul>
<b>NSW Work Health &amp; Safety Act 2011</b> <ul style="list-style-type: none"> <li>• <i>Work Health &amp; Safety Regulation 2017</i></li> </ul>	<ul style="list-style-type: none"> <li>• Health and safety duties (Part 2)</li> <li>• Duty to notify WH&amp;S incidents (Part 3)</li> <li>• Duty to identify hazards (cl 34 of Reg)</li> <li>• Management of airborne contaminants (Part 3.2, Div 7 of Reg)</li> <li>• Management of hazardous atmospheres (Part 3.2, Div 8 of Reg)</li> <li>• Minimise storage of storage of flammable and combustible substances (Part 3.2, Div 9 of Reg)</li> <li>• Manage risk of hearing loss due to noise (cl 57 of Reg)</li> <li>• Obligations in relation to hazardous chemicals (Part 7.1 of Reg)</li> <li>• Obligations in relation to lead (Part 7.2 of Reg)</li> <li>• Obligations in relation to asbestos (Chapter 8 of Reg)</li> <li>• Obligations in relation to major hazard facilities (Chapter 9 of Reg)</li> </ul>
<b>NSW Dangerous Goods (Road and Rail Transport) Act 2008</b> <ul style="list-style-type: none"> <li>• <i>Dangerous Goods (Road and Rail Transport) Regulation 2009</i></li> </ul>	<ul style="list-style-type: none"> <li>• Duties concerning the transport of dangerous goods (s9)</li> <li>• Duties concerning the transport of dangerous goods to which special provisions apply (Part 3 of Reg)</li> <li>• Duties in relation to packaging of dangerous goods (Part 4 of Reg)</li> <li>• Consignment procedures for dangerous goods (Part 5 of Reg)</li> <li>• Safety standards (vehicles and equipment) for dangerous goods (Part 6 of Reg)</li> <li>• Transport operations relating to certain dangerous goods (Part 7 of Reg)</li> <li>• Duties regarding stowage and restraint of dangerous goods (Part 8 of Reg)</li> <li>• Duties regarding segregation of dangerous goods (Part 9 of Reg)</li> <li>• Duties regarding bulk transfer of dangerous goods (Part 10 of Reg)</li> <li>• Duties for documentation of dangerous goods for transport (Part 11 of Reg)</li> <li>• Duties regarding safety equipment (Part 12 of Reg)</li> <li>• Duties regarding transport procedures (Part 13 of Reg)</li> <li>• Duties regarding emergencies (Part 14 of Reg)</li> </ul>

	<ul style="list-style-type: none"> <li>• Requirement to licence vehicles (cl 191 of Reg)</li> <li>• Requirement to licence drivers (cl 192 of Reg)</li> </ul>
<b>Environmentally Hazardous Chemicals Act 1985</b> <ul style="list-style-type: none"> <li>• <i>Environmentally Hazardous Chemicals Regulation 2017</i></li> </ul>	<ul style="list-style-type: none"> <li>• Obligations to comply with chemical control orders (s26)</li> <li>• Requirements for licensing of any prescribed activity with respect to environmentally hazardous chemicals or declared chemical waste (s28)</li> </ul>
<b>NSW Biosecurity Act 2015</b> <ul style="list-style-type: none"> <li>• <i>Biosecurity Regulation 2017</i></li> </ul>	<ul style="list-style-type: none"> <li>• Duty to prevent, eliminate or minimise biosecurity risk (s22)</li> <li>• Prohibition of dealing with prohibited matter (s28)</li> <li>• Duty to notify prohibited matter events (s30)</li> <li>• Duty to prevent, eliminate or minimise biosecurity risk posed by prohibited matter (s36)</li> <li>• Duty to notify biosecurity events (s38)</li> <li>• Prohibited dealings (s152)</li> <li>• Duty to notify certain pests and diseases (cl 7 of Reg)</li> </ul>
<b>NSW Roads Act 1993</b> <ul style="list-style-type: none"> <li>• <i>Roads Regulation 2018</i></li> </ul>	<ul style="list-style-type: none"> <li>• Requirement for public authorities to consult with RMS and receive approval for work on a classified road (s75 of Act)</li> </ul>
<b>NSW Road Transport Act 2013</b> <ul style="list-style-type: none"> <li>• <i>Road Rules 2014</i></li> <li>• <i>Road Transport (Driver Licensing) Regulation 2017</i></li> <li>• <i>Road Transport (General) Regulation 2013</i></li> <li>• <i>Road Transport (Vehicle Registration) Regulation 2017</i></li> </ul>	<ul style="list-style-type: none"> <li>• Requirement for approval from relevant roads authority for installation or removal of a traffic control device (Div 2 of Part 5.3 of Act)</li> <li>• Duties concerning the lawful use of roads in NSW (Act and Regs)</li> </ul>
<b>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</b> <ul style="list-style-type: none"> <li>• <i>Environment Protection and Biodiversity Conservation Regulations 2000</i></li> </ul>	<ul style="list-style-type: none"> <li>• Requirements relating to matters of national environmental significance (Part 3, Div 1)</li> <li>• Environmental assessment and approval of controlled actions (Chapter 4 of Act, Part 5 of Regs)</li> </ul>
<b>Commonwealth Biosecurity Act 2015</b> <ul style="list-style-type: none"> <li>• <i>Biosecurity Regulation 2016</i></li> </ul>	<ul style="list-style-type: none"> <li>• Requirements to manage biosecurity risks: human health (Chapter 2 of Act)</li> <li>• Requirements to manage biosecurity risks: goods (Chapter 3 of Act, Chapter 2 of Reg)</li> <li>• Requirements to manage biosecurity risks: conveyances (Chapter 4 of Act, Chapter 3 of Reg)</li> <li>• Requirements to manage biosecurity risks: monitoring, control and response (Chapter 6 of Act, Chapter 5 of Reg)</li> <li>• Provision for approved arrangements to manage biosecurity risk (Chapter 7 of Act, Chapter 6 of Reg)</li> </ul>

## Appendix B: HSE Policy

## Health, Safety and Environment (HSE) Policy

At NSW Ports we manage ports and intermodal assets that are key trade gateways connecting the people and businesses of NSW to global and domestic markets. We place a high priority on Health, Safety and Environmental (HSE) management to effectively mitigate risk while pursuing sustainable growth for our business.

We are committed to providing safe and healthy work conditions for employees, contractors, visitors and other persons at our workplaces and controlled premises, involved in activities of our undertaking. Together, we strive to prevent work-related injury and ill health.

We are also committed to protecting the environment by preventing pollution, responding to climate change, conserving local ecological and heritage values and using resources efficiently and sustainably.

### Our Approach:

Our integrated management system provides a framework to achieve HSE objectives in accordance with our corporate values of care, collaboration, passion, integrity and accountability.

HSE management is a shared responsibility for everyone who works for NSW Ports or visits an NSW Ports workplace. We encourage visible leadership, engaging consultation and active participation of relevant stakeholders in HSE processes. Workers are required to take reasonable care for their own health and safety and the health and safety of others, including complying with any reasonable instruction given by NSW Ports and cooperating with any reasonable policy or procedure.

### We implement our HSE Commitments by:

- Setting, monitoring and reviewing measurable HSE objectives and targets.
- Complying with relevant HSE legislation, approvals, licences, regulations, recognised standards and industry practice.
- Implementing an integrated risk management framework to mitigate the risk of hazards via a formal process of hazard identification, risk assessment, and elimination or control.
- Investigating incidents that cause or threaten significant harm to people or the environment and ensuring appropriate actions are taken in a timely manner to prevent a reoccurrence.
- Reporting HSE hazards, near misses, incidents and impacts, and corrective actions to senior management and the Board.
- Establishing HSE responsibilities and accountabilities according to the role, for our staff and other stakeholders such as contractors, visitors, tenants and other persons conducting business or undertakings at our sites.
- Consulting, collaborating and communicating HSE responsibilities, expectations, policies and processes to our staff and other stakeholders.
- Providing appropriate training and support to ensure the competence of staff and others in fulfilling their HSE responsibilities.
- Providing and maintaining adequate premises, facilities, amenities, working conditions and resources to effectively meet our HSE objectives and procedures whilst conducting business.

We regularly review and update our HSE management system to continually improve our safety and environmental management and performance.

A handwritten signature in blue ink, appearing to read "Marika Calfas".

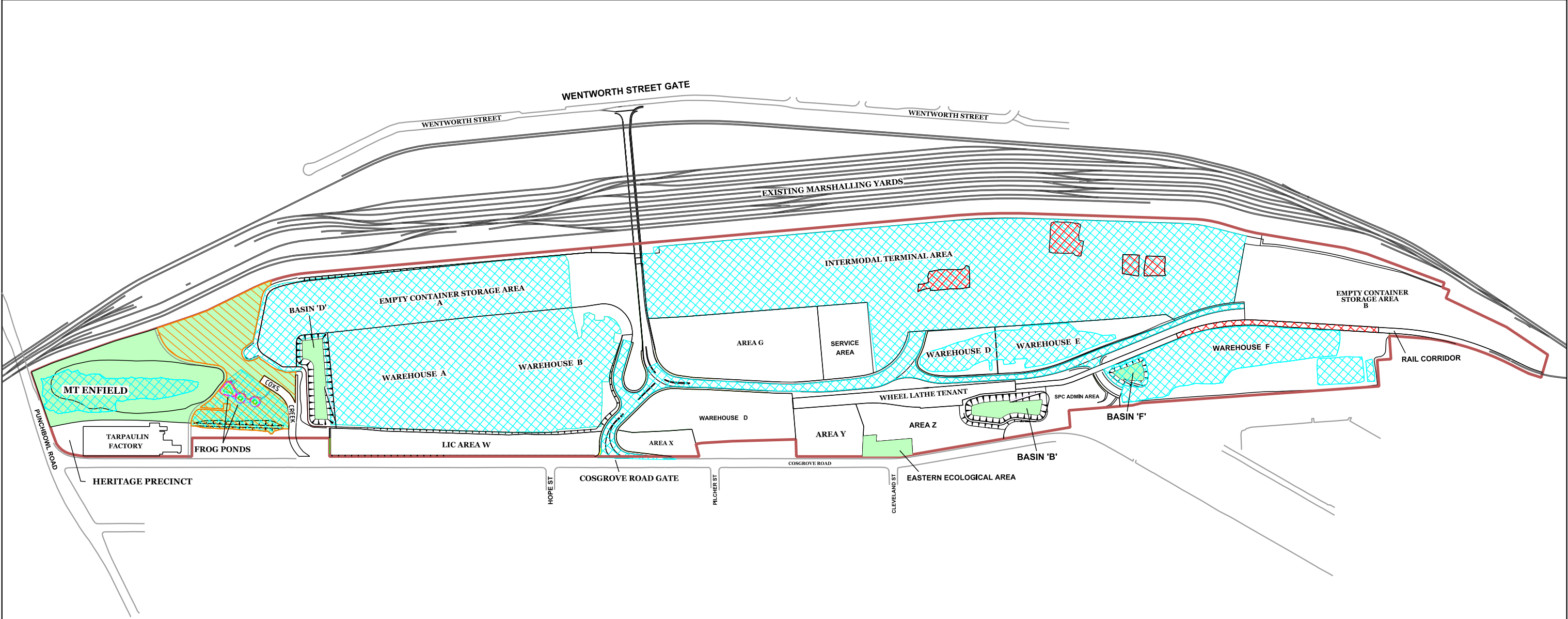
**NSW Ports CEO – Marika Calfas**

13/08/2020

**Date**



## Appendix C: ILC Sensitive Area Map




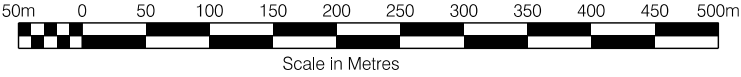
KEY:

-  CAPPED AREAS
-  STORMWATER BASIN / ECOLOGICAL AREA
-  FROG HABITAT AREA
-  CONTAINMENT CELL

**PLAN LIMITATION STATEMENT**  
This plan has been prepared in accordance with accepted practice for the use only of Sydney Ports Corporation for a specific purpose. No Warranty or representation, expressed or implied is made to any other party regarding this survey and plan. This plan should not be relied upon for any other purpose or use by any party including Sydney Ports Corporation as the plan may not contain sufficient information for that purpose or use.

**THIS NOTE IS AN INTEGRAL PART OF THIS PLAN**  
**NOTE: STATED MEASUREMENTS ARE INDICATIVE ONLY AND SUBJECT TO SURVEY**  
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 ILC Site Boundary



**NSW Ports**  
ENFIELD

PLAN PRODUCED ON MGA GRID

ILC SENSITIVE AREA MAP		
DRAFTED BY: A.K.	DATE: 30.01.2014	PLAN SCALE: AS PER SCALE BAR
PROJECT CODE:		DWG NO: SEDP214A

# Appendix D: Sample Checklist Template

## NSW Ports Environmental Management Plan (EMP) Content Checklist

v2 - March 2018

Ref. No	Required content	Section where addressed or N/A (EMP Author to complete)	Confirmed/comments (NSW Ports reviewer use only)
1	Background		
	a.) Introduction		
	b.) Project Description		
	c.) EMP Context		
	d.) Environmental and Sustainability Objectives/Targets		
	e.) Environmental and/or Sustainability Policy		
2	Environmental Management		
	a.) Environmental Management Structure and Responsibility		
	b.) Approvals, Legislation and Licensing Requirements		
	c.) Environmental Reporting		
	d.) Environmental Training		
	e.) Emergency Contacts		
	f.) Incident/Emergency response and notification procedures		
	g.) Complaints management procedures		
3	Implementation		
	a.) Risk Assessment and Identification of Control Measures to reduce impact:		
	Sediment and Erosion		
	Contamination		
	Water Quality		
	Traffic Management		
	Air quality		
	Noise		
	Biodiversity/Ecology		
	Waste		
	Heritage		
	Other (as required, i.e. vibration, light spill, flooding)		
	b.) Environmental Management Activities and Controls		
	c.) Environmental Control Plans or Maps		
	d.) Environmental Schedules, forms or registers		
4	Monitoring and Review		
	a.) Environmental Monitoring, including against objectives/targets		
	b.) Environmental Auditing, including against objectives/targets		
	c.) Corrective Action		
	d.) EMP Review		

### Additional Optional Questions for Contractors/Project Managers

YES NO

- 1 Have you assessed all the environmental, social and economic impacts of the works and applies measures to mitigate negative impacts?
- 2 Are there any opportunities for the works to provide positive environmental, social and economic impacts for the environment or local community?
- 3 Do you have a sustainable procurement policy when it comes to material/goods and supplier selection?
- 4 Are the materials you have selected for the project "environmentally friendly" i.e. have an environmental label or are from sustainable supply chains?
- 5 Have you assessed the amount of waste to be generated by the works and made plans to recycle and monitor waste material appropriately?
- 6 Can you think of any potential innovations or opportunities for innovation associated with the works? i.e. a new material, technology, process or method?

NSW Ports Assessment		
For internal NSW Ports use only		
1	Is the EMP consistent with NSW Ports EMP?	
2	Is the EMP consistent with Project Approval/Lease conditions if relevant?	
3	What are the key environmental risks associated with the works/activities?	
4	Is an audit required/recommended by NSW Ports for the key risk areas?	
	If yes, identify timing and frequency	
5	Are there any opportunities arising from the additional questions that NSW Ports should pursue further?	

NSW Ports

Reviewer

Name, Position

Date



## **Tenant Operational Environmental Compliance Check**

**Location:**

**Occupant:**

**Tenure of Occupant:** Lease / Licence / Other

**Status of Site:**

### **Relevant Approvals**

Approval Type	Ref. No.	Description

### **Environmental Management Plan / Work Method System**

Document Title	Version	Date

### **Compliance Check Methodology**

Method	Yes/No	Date(s)	Participants
Site inspection			
Interview / meeting with tenant			
Document review			
Other: <i>[specify]</i>			



**Management of Significant Environmental Risks**

Aspect	Requirement	Complies (Y/N/Unsure)	Evidence Cited	Date	Comment
Traffic & Transport					
Noise					
Air Quality					
Contamination					

**General Environmental Management Elements**

Element	Criteria	Satisfactory (Y/N/Unsure)	Evidence Cited	Date	Comment
Incident Management					
Complaint Management					

Element	Criteria	Satisfactory (Y/N/Unsure)	Evidence Cited	Date	Comment
Environmental Reporting					
Auditing					

**Summary of Items Requiring Corrective/Preventative Actions**

Issue/Action	Assigned to and date	Follow up/Re-inspection details	Confirmed closed?
1.			
2.			
3.			
4.			
5.			

This report has been prepared in good faith based on the observations of NSW Ports' personnel and the information supplied by the tenant. The report is not intended to be a comprehensive compliance audit, rather it seeks to identify potential compliance issues of relevance to NSW Ports and Port Lessor. The tenant is entirely responsible for complying with its own environmental obligations and this report must not be relied upon, including in any dealings with a government authority or accredited certifier.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

# Appendix E: Environmental Aspects and Impacts Register

The following tables outline the NSW Ports risk assessment methodology and have been used to assess all construction related environmental risks for the Enfield ILC.

#### Risk Methodology: Risk Rating for Likelihood

2) Likelihood rating			
Rating	Definition	Frequency	Description
1	Rare	Once every 25 years (0-10%)	Has not happened previously in our industry, but is a conceivable scenario / The risk will only occur in exceptional circumstances and is almost impossible
2	Unlikely	Once every 10 years (10-40%)	Has happened previously in our industry / The risk event may occur but only in certain circumstances and not likely to occur
3	Possible	Once every 5 years (40-70%)	Has been logged at least once within our organisation or my previous employer(s) / The risk event could occur at some point over the period of the objective
4	Likely	Once every 2 years (70-90%)	Has been logged at least several times within our organisation or my previous employer(s) / The risk event will probably occur at some point
5	Almost Certain	Once every year (90-100%)	Has been logged regularly in this area and others (known industry issue) / Risk event is almost certain to occur at some point

#### Risk Methodology: Risk Rating for Consequence (severity)

1) Consequence Rating						
Rating	Description	Financial	Environmental	Safety	Reputational	Operational
1	Minor	<\$0.1M	Marginal environmental damage/onsite release contained immediately and not requiring notification of EPA.	Minor injury requiring simple first aid treatment.	Isolated complaint by an individual. No media attention.	Interruption of a critical function or process of less than 24 hours, or less than 48 hours for a non-core function or process
2	Moderate	<\$0.2M	Environmental damage requiring notification to EPA.	Medical attention and absence from work for less than 5 days.	Complaint by multiple individual's. Low profile media attention.	Interruption of a critical function or process of between 24 and 48 hours, or between 2 and 7 days for a non-core function or process

3	Major	<1.0M	Environmental damage leading to an EPA investigation.	Injury requiring hospitalisation with absence from work for over 5 days, but no lasting health impact.	Level of public attention diverting significant management resources towards dealing with underlying matter. Delay to or suspension of strategic projects and revision of strategic goals.	Interruption of a critical function or process of between 2 and 7 days, or between 7 and 14 days for a non-core function or process
4	Critical	<\$5M	Environmental damage leading to an EPA enforceable undertaking.	Single serious long term injury or disability.	Severe dent in key stakeholder confidence requiring extensive engagement of top management to restore trust and faith. Significant reduction in stakeholder support	Major or total disruption to operations of between one and four weeks
5	Extreme	>\$5M	Extensive environmental damage leading to a parliamentary inquiry or commission.	Loss of life or multiple serious long term injuries or disabilities.	Loss of key stakeholder confidence affecting future growth and investment. Public outrage	Major or total disruption to operations of greater than four weeks

### Risk Methodology: Risk Matrix

		Likelihood				
		Rare	Unlikely	Possible	Likely	Almost Certain
Consequence		1	2	3	4	5
Extreme	5	Significant (5-1)	High (5-2)	High (5-3)	High (5-4)	High (5-5)
Critical	4	Significant (4-1)	Significant (4-2)	High (4-3)	High (4-4)	High (4-5)
Major	3	Moderate (3-1)	Moderate (3-2)	Significant (3-3)	Significant (3-4)	High (3-5)
Moderate	2	Low (2-1)	Low (2-2)	Moderate (2-3)	Significant (2-4)	Significant (2-5)
Minor	1	Low (1-1)	Low (1-2)	Low (1-3)	Moderate (1-4)	Significant (1-5)

## Risk Assessment: Aspects and Impacts Register Enfield

ACTIVITY	ASPECT	IMPACT	UNCONTROLLED RISK			MITIGATION MEASURES (REFER TO TABLES 4-10 FOR DETAILS)	RESIDUAL RISK		
			S	L	Risk		S	L	Risk
<b>Cargo Handling - general</b>	Machinery and cargo handling noise	1. Noise pollution complaints	1	3	Low	N1, N2	1	2	Low
	Leaks & spills from underground petroleum storage facilities	1. Soil pollution - hydrocarbons	3	3	Significant	L1, L2, L3, L4, L5, L7	2	2	Low
		2. Groundwater pollution - hydrocarbons	3	3	Significant	L1, L2, L3, L4, L5, L7	2	2	Low
	Exhaust emissions to air	1. Air pollution - excessive PM, NOx, SOx	1	4	Moderate	AQ1, AQ2	1	2	Low
<b>Cargo Handling - Dangerous Goods and Hazardous Substances</b>	Uncontrolled release due to leak, spill or other emergency	1. Injury to humans	4	3	High	L1, L3, WQ1, WQ3, AQ1, AQ3	4	1	Significant
		2. Air pollution - toxicant	3	2	Moderate	AQ1, AQ3	3	1	Moderate
		3. Water pollution – toxicant	4	3	High	WQ1, WQ2	4	1	Significant
		4. Soil pollution - toxicant	3	3	Significant	L1, L2, L3, L4, L5, L7	3	2	Moderate
<b>Maintenance regimes</b>	Noxious weed incursion	1. Loss of biodiversity	2	3	Moderate	FF1, FF4	2	2	Low
	Dilapidation of heritage item	1. Loss of heritage value	3	3	Significant	H1, H3	1	2	Low
<b>Works on or in the vicinity of a heritage item</b>	Disturbance of heritage item	1. Loss of heritage value	3	2	Moderate	H1, H2	1	2	Low
<b>Building works</b>	Disturbance of materials containing asbestos	1. Air pollution – asbestos	3	3	Significant	AQ1, AQ4	2	2	Low
		2. Human health – respiratory illness	4	3	High	AQ1, AQ4	4	1	Significant
<b>General Construction</b>	Disturbance of endangered frog species and habitat	1. Loss of habitat	4	1	Significant	FF2, FF3	3	1	Moderate
		2. Fauna disturbance/death	4	1	Significant	FF2, FF3	3	1	Moderate
<b>Excavation / Earthmoving</b>	Exposure of soil to wind and water erosion	1. Air pollution - dust	1	4	Moderate	AQ1, AQ5	1	2	Low
		2. Water pollution - sediment / turbidity	1	4	Moderate	WQ1, WQ4	1	2	Low
	Disposal of waste associated with earthmoving activities.	1. Reduced landfill volumes	1	3	Low	WM1, WM2	1	2	Low
		2. Loss of potential resources	1	3	Low	WM1, WM2	1	2	Low



		3. Land pollution – various	2	3	Moderate	WM1, WM2	1	3	Low
		4. Water pollution – sediment / turbidity	2	3	Moderate	WQ1, WQ4	1	2	Low
		5. Water pollution - leachates	2	3	Moderate	WQ1, WQ4	1	2	Low
	Contaminated soil disturbance	1. Water pollution – toxicants	3	3	Significant	L1, L7, WQ1, WQ4	2	2	Low
		2. Air pollution – toxicants	2	3	Moderate	L1, L7, AQ1, AQ5	1	2	Low
		3. Human health – toxic effects	3	2	Moderate	L1, L7, WQ1, WQ3, AQ1, AQ5	3	1	Moderate
	Disturbance of asbestos-bearing materials	1. Air pollution – asbestos	3	2	Moderate	AQ1, AQ4, AQ5	2	2	Low
		2. Human health – respiratory illness	4	1	Significant	AQ1, AQ4, AQ5	3	1	Low
<b>Landscaping</b>	Clearing of vegetation/ tree removal/reduction	1. Loss of vegetation/ harm to tree	1	3	Low	FF1, FF2	1	2	Low
		2. Loss of fauna habitat	3	3	Significant	FF1, FF2,	2	2	Low
<b>Operation of vehicles and equipment on unsealed areas</b>	Wheel-generated dust and sediment “drag-out”	1. Air pollution – dust	3	4	Significant	AQ1, AQ3, AQ5	1	3	Low
		2. Water pollution – sediment / turbidity	1	3	Low	WQ1, WQ3, WQ4	1	2	Low
<b>Stockpiling of Materials</b>	Water & wind erosion from exposed surfaces and stockpiles	1. Water pollution – sediment / turbidity	1	3	Low	WQ1, WQ4	1	2	Low
		2. Air pollution – dust	2	3	Moderate	AQ1, AQ5	1	2	Low
<b>Operation of Vehicles, Plant and Equipment</b>	Machinery noise	1. Noise pollution	1	3	Low	N1, N2	1	2	Low
	Fuel & oil spills & leaks	1. Land pollution - hydrocarbons	2	4	Significant	L1, L3, L4, L7	2	2	Low
		2. Water pollution – hydrocarbons	2	3	Moderate	WQ1, WQ2	2	1	Low
<b>Works on or in the vicinity of waterways</b>	Bed and bank erosion	1. Water pollution – sediment / turbidity	2	4	Significant	WQ1, WQ4	1	3	Low
	Disturbance of aquatic ecosystems	1. Loss of / harm to aquatic vegetation	3	4	Significant	FF1, FF2	3	2	Moderate
		2. Loss of aquatic fauna habitat	3	4	Significant	FF1, FF2	3	2	Moderate
<b>Road Transport</b>	Traffic conditions	1. Increased traffic congestion	2	5	Significant	T1, T2	1	5	Significant

		2. Increased road accidents	4	3	High	T1, T2	4	1	Significant
	Road-related noise	1. Noise pollution – road noise	2	3	Moderate	T1, T2	2	2	Low
	Exhaust emissions to air	1. Air pollution - excessive PM, NOx, SOx	1	4	Moderate	AQ1, AQ2	1	2	Low
<b>Rail Transport</b>	Rail-related noise	1. Noise pollution – rail noise	2	4	Significant	N1, N2	2	2	Low
	Exhaust emissions to air	1. Air pollution – excessive PM, NOx, SOx	1	4	Moderate	AQ1, AQ2	1	2	Low
<b>Rail Transport - Loco Refuelling &amp; Servicing</b>	Fuel & oil spills & leaks	1. Soil pollution - hydrocarbons	3	5	High	L1, L3, L4, L7	3	4	Significant
		2. Water pollution - hydrocarbons	4	3	High	WQ1, WQ2, WQ4	4	2	Significant
<b>Stormwater/Wastewater/ Sewerage Management</b>	Discharge to waters	1. Water pollution - gross pollutants	2	5	Significant	WM1, WM3, WQ1, WQ4	1	3	Low
		2. Water pollution - sediment / turbidity	2	5	Significant	WM1, WM3, WQ1, WQ4	1	3	Low
		3. Water pollution - hydrocarbons	3	4	Significant	WM1, WM3, WQ1, WQ4	1	3	Low
		4. Water pollution - nutrients	1	4	Moderate	WM1, WM3	1	2	Low
		5. Water pollution - pathogens	2	4	Significant	WM1, WM3	1	2	Low

## Appendix F: Operational Traffic Management Plan

# Appendix G: Operational Noise Management Plan

## 1. Introduction

The Conditions of Approval for the ILC at Enfield project include a requirement as part of the Operational Environmental Management Plan (OEMP) to prepare and implement an Operational Noise Management Plan (ONMP) to outline monitoring, management procedures and measures to minimise operational noise impacts associated with the project, including traffic-related noise. Each ILC tenant is required to prepare and implement a detailed ONMP as part of the OEMP for their own site and operations in a staged approach coinciding with the staging outlined in NSW Ports Staging Report.

### Scope

This ONMP has been developed to address two key objectives:

- An assessment of the noise impacts of NSW Ports' activities covered by the Operational Environment Management Plan and how those impacts will be mitigated.
- A description of how NSW Ports, as the ILC manager, will manage whole of site noise impacts and implement the noise auditing requirements from the Project Approval.

### Management Plan Requirements

CoA 6.5 a) of the Project Approval outlines the requirements for the ONMPs prepared under this ONMP Framework:

*As part of the Operation Environmental Management Plan for the project, required under condition 6.4 of this approval, the Proponent shall prepare and implement the following Management Plans:*

- a.) *an Operation Noise Management Plan to outline monitoring, management procedures and measures to minimise operational noise impacts associated with the project, including traffic-related noise. The Plan shall include, but not necessarily be limited to:*
  - (i) *identification of all relevant receivers and the applicable criteria at those receivers commensurate with the noise limits specified under this approval;*
  - (ii) *identification of activities that will be carried out in relation to the project and the associated noise sources;*
  - (iii) *assessment of project noise impacts at the relevant receivers against the noise limits specified under this approval;*
  - (iv) *details of all management methods and procedures that will be implemented to control individual and overall noise emissions from the site during the project;*
  - (v) *development of reactive and pro-active strategies for dealing promptly with any noise complaints;*
  - (vi) *noise monitoring and reporting procedures; and*
  - (vii) *regular internal audits of compliance of all plant and equipment with acceptable design noise.*

## 2. Noise Level Criteria and Receivers

As per the Project Approval, the hours of operation are 24 hours 7 days per week for the Intermodal terminal, warehousing and container yards. Hours of operation for the Light Industrial and Commercial Areas are 7:00am – 7:00pm, 7 days per week.

Site specific assessment locations (residential receivers) for the ILC were identified in the Environmental Assessment (EA), the Preferred Project Report (PPR) and the Project Approval. These locations are shown on the figure below. The operational noise criteria are provided in CoA 2.17 and reproduced in the table below.

**CoA 2.17:** *The proponent shall design, construct, operate and maintain the project to ensure that the operational noise contributions from the project do not exceed the maximum allowable noise levels specified...below, at those locations and during those periods indicated. The maximum allowable noise contributions apply under:*

- a.) *wind speeds up to 3 ms<sup>-1</sup>*
- b.) *temperature inversion conditions up to 3°C per 100 metres and wind speeds up to 2 ms<sup>-1</sup> (measured at 10 metres above ground level)*

LOCATION <sup>4</sup>	DAY		EVENING		NIGHT		
	L <sub>Aeq</sub> (15 min) <sup>5</sup>	L <sub>Aeq</sub> (period) <sup>6</sup>	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (period)	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (period)	L <sub>A1</sub> <sup>7</sup> (1-minute)
<b>A1 Eastern end Jean St</b>	54	54	54	49	48	42	58
<b>A2 Eastern end Ivy S</b>	53	52	52	51	47	45	57
<b>A3 Wentworth St (South)</b>	49	52	47	53	42	38	52
<b>A4 Western<sup>8</sup> end Gregory St</b>	49	52	47	46	45	37	55
<b>A5 Western end Blanche St</b>	46	58	46	50	43	43	53
<b>A6 40 Bazentin St</b>	46	58	45	54	41	39	51
<b>A11 Begnell Park</b>	-	50	-	50	-	50	-
<b>A12 Matthews Park*</b>	-	50	-	50	-	50	-
<b>A13 Greenacre Bowling Club</b>	-	55	-	55	-	55	-
<b>A14 Strathfield High School (Internal)</b>	-	35	-		-	-	-
<b>A15 St. Anne's Schools (internal)</b>	-	35	-		-	-	-

\* Note that Site A12 has been redeveloped to commercial premises and is no longer an outdoor recreational facility

<sup>4</sup> The alpha-numeric references are those used in the EA stage reports prepared by others and also in the Project Approval Conditions.

<sup>5</sup> The 15 minute criterion for each period refers to the 'Intrusiveness' criterion, derived according to procedures set out in the Industrial Noise Policy.

<sup>6</sup> The 'period' criterion for each period refers to the 'Amenity' criterion derived according to procedures set out in the Industrial Noise Policy.

<sup>7</sup> The L<sub>A1</sub> noise descriptor is an approximation of the maximum noise level and is used to assess the potential for sleep disturbance by reviewing its emergence above the prevailing background noise level. The EA stage report expands on the criteria derived for each residential receiver by noting that 'Where the emergence level is less than 65 dB(A), a (sleep disturbance criterion) value of 65 dB(A) (applies) outdoors'.

<sup>8</sup> The receivers at the western end of Gregory Street are potentially the most noise-affected of the receivers in Gregory Street (although by a very small margin, less than 1 dB(A)). The EA called up the eastern end of Gregory Street.



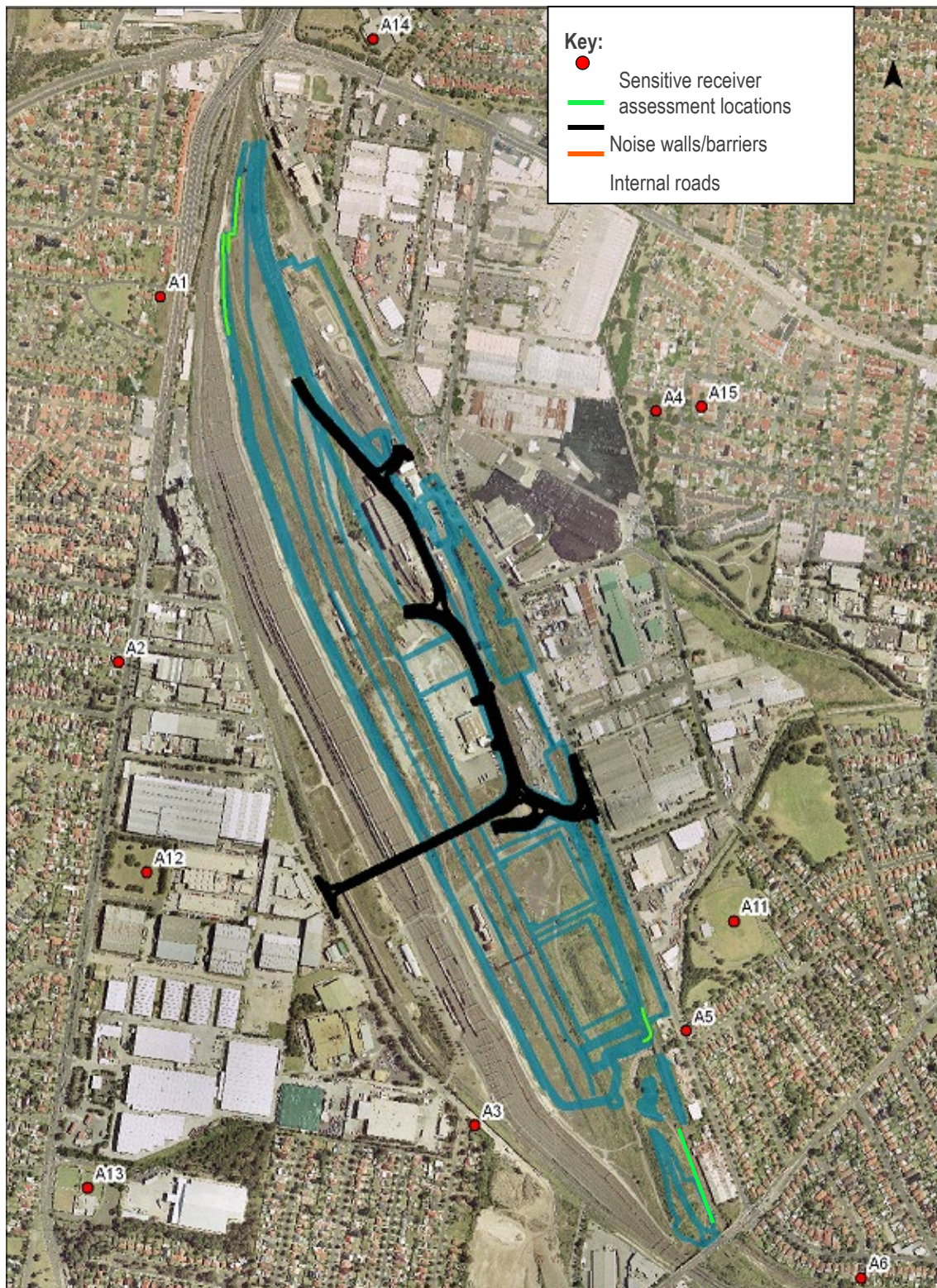


Figure 1: Aerial photograph of Enfield ILC site including assessment locations

In accordance with the requirements of CoA 2.18, for the purpose of assessment of noise contributions specified under CoA 2.17, noise from the ILC shall be:

- measured at the most affected point on or within the site boundary at the most sensitive locations to determine compliance with  $L_{Aeq}(15 \text{ minute})$  and  $L_{Aeq}(\text{period})$  noise limits;
- measured in the free-field at least 3.5 metres from any vertical reflecting surface in line with the worst affected dwelling facade to determine compliance with the  $LA1(1 \text{ minute})$  noise limits; and
- subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA 2000), where applicable.



Should direct measurement of noise from the development be impractical, an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the Noise Policy for Industry New South Wales (EPA 2000)) may be employed. Details shall be submitted to the Planning Secretary of DPE prior to the implementation of the assessment method.

### 3. Whole of Site Noise Management

NSW Ports activities covered under the NSW Ports OEMP are not expected to generate an audible noise impact at any of the sensitive receivers defined in Section 4. The types of machinery expected to be used will be limited to small vehicles such as maintenance utes, landscaping equipment and infrastructure maintenance equipment. Activities will primarily be undertaken during daylight hours.

Where relevant, NSW Ports will employ the noise mitigation measures outlined in Section 7 below and Section 3.2.2 of NSW Ports OEMP. The following noise generating activities and associated noise sources due to tenant activities were identified in the detailed design stage acoustic assessment of the ILC:

NOISE SOURCE	ACTIVITIES
<b>Internal Access Roads</b>	- Moving trucks, idling trucks
<b>Industrial Noise</b>	- Container loading/unloading handling equipment (e.g. reach stacker); - Metal 'clangs' from pick-up and put-down of containers; - Building ventilation; - Forklift movements; - Public address (PA) system; and - Commercial power washer.
<b>Rail Corridor</b>	- Moving train (two locomotives); - Idling train (two locomotives); and - Rail sidings and apron: splitting of trains and the reach stacker operation of container loading and unloading trains.
<b>Warehouses</b>	- Pack/unpack; - Truck and light vehicle movements (including truck idling); - Forklift movements; - PA System; and - Container stacking.
<b>Light Industrial Areas</b>	- Pack/unpack; - Truck and light vehicle movements; and - Forklift movements.

Each ILC tenant is responsible for developing an ONMP for their operations. NSW Ports will ensure that tenants are aware of their obligations in regards to noise management and will review and provide feedback on each ONMP to ensure those obligations are addressed. The ONMP preparation, review and approval process is presented in Figure 2 below.

NSW Ports will require ILC tenants to provide a consistency analysis of their proposed operations against the assessed operations in the relevant Noise Impact Assessment to ensure that predicted noise levels are consistent with the terms of the Project Approval. If the consistency analysis indicates that the noise contribution from a tenant's proposed activity may be greater than was originally assessed, one or more of the following options shall be adopted:

- (i) amend the nature and scope of the proposed activities to ensure consistency with the Project Approval;
- (ii) provide additional noise mitigation measures to achieve consistency with the Project Approval;
- (iii) undertake further noise impact assessment to more accurately quantify the impact of the noise increase and its implications for the ability of the whole project to meet its noise criteria; or
- (iv) request a modification to the Project Approval with the appropriate level of supporting information to assess and justify the proposed use.

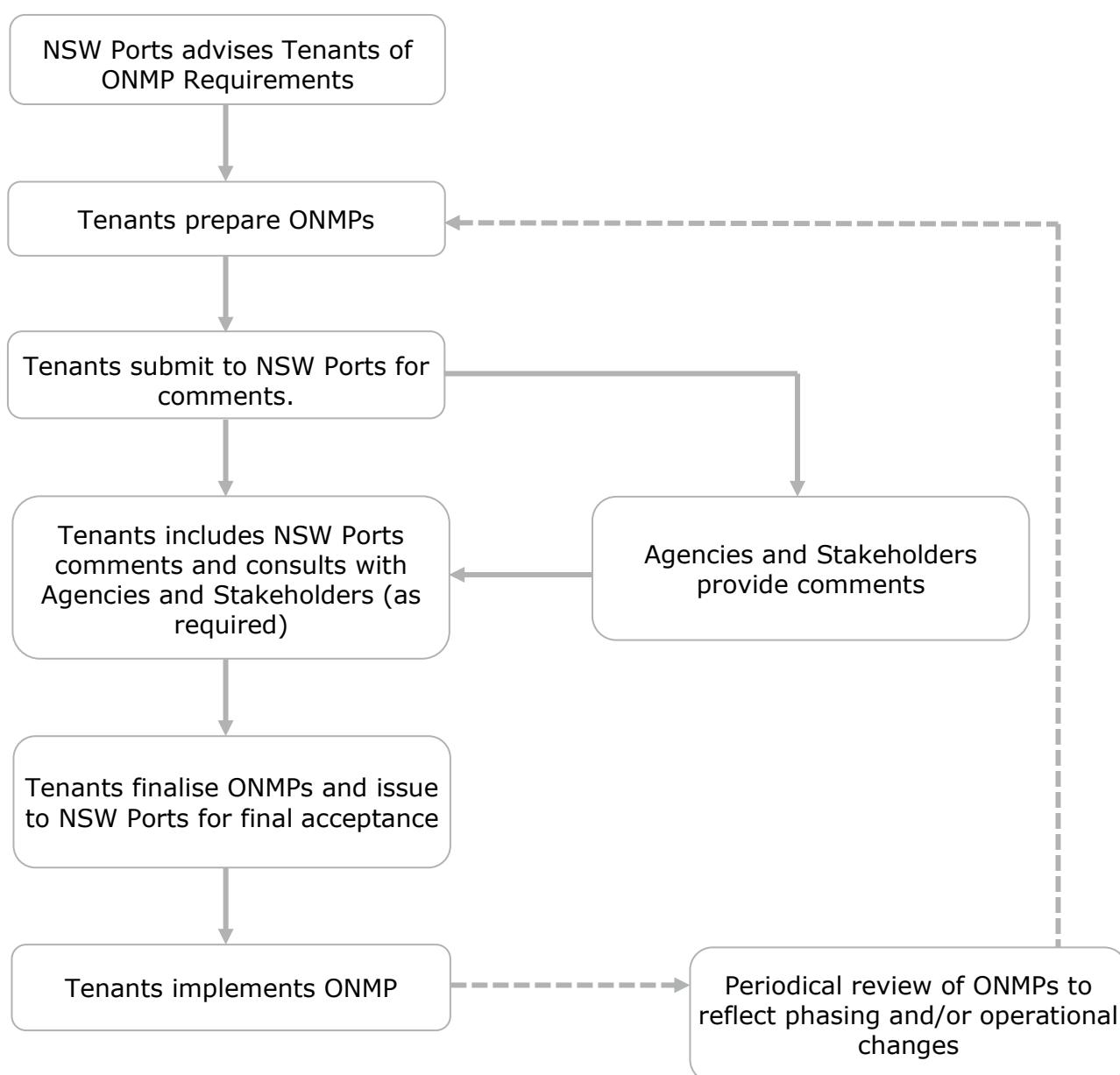


Figure 2: ONMP preparation, review and approval process

## 4. Noise control measures

A range of noise related obligations and control measures were identified in the EA, the PPR and the Project Approval. Specific measures and procedures to address the noise related project obligations are to be detailed in the ONMPs. The timing and personnel responsibility for installation and implementation of control measures and routine inspection and maintenance of environmental controls shall also be incorporated in the OEMP/ONMPs.

Notwithstanding this, the following sections outlines some of the general noise control measures that will be utilised by ILC Tenants and NSW Ports to minimise noise impacts from the ILC site. These lists are not exhaustive and additional measures may be proposed in ILC Tenants ONMPs.

### Noise Barriers

The following noise mitigation barriers have been constructed in accordance with the design approved under Modification Application 6 (refer to Figure 1 for locations):

- southern-eastern L-shaped barrier located adjacent to stormwater detention basin D, total length of 77 m;
- north-western barrier aligned with the northern-most point of the container stacking area, total length 370 m; and

- south-eastern earth noise mound (east of the frog ponds), total length 110 m.

Modification 14 to the Project Approval replaced the originally proposed Empty Container Storage Area A in the south east of the site with additional warehouse development. Therefore the requirement for temporary noise walls has been mitigated through the warehouse design. However, in the event that NSW Ports is required to construct a temporary noise wall using empty containers, these works will occur within the identified construction hours in CoA 2.15.

The use of stacked 40 foot shipping containers (purpose-stacked containers as noise barriers) in any potential empty container storage area and restrictions on container stacking will be investigated by the IMT Tenant and details provided in their OEMP/ONMP, in consultation with NSW Ports as per the Conditions of Approval 2.14A and 6.5(a) v).

### **Vehicles, Trains, Plant and Machinery**

NSW Ports and Tenants will undertake the following mitigation measures where relevant to mitigate noise from equipment and machinery:

- ILC Tenant to develop and implement procedures to reduce time spent by locomotives idling at the northern end of the site where possible;
- Installing and maintaining efficient silencers, low-noise mufflers (residential standard) and by replacing reversing alarms with alternative silent measures, such as flashing lights (subject to occupational health and safety requirements) for night time operations and non-tonal quackers;
- Restriction of the use of any public address systems at night; and
- Consideration of the treatment or location of fixed mechanical plant.
- Procedures and Participation
- Additional management procedures and participation opportunities to assist in addressing noise impacts may include:
- Appropriate complaints procedures and means of responding to complaints;
- Investigative monitoring of noise in response to specific complaints;
- Training and educational programs for staff to reinforce the importance of noise issues and the measures that will be implemented to protect the environment, and in particular noise sensitive receivers;
- Review of night operations where any actions would not affect the feasibility of the site's operation;
- Monitoring of noise levels on site and at sensitive receivers to determine actual noise levels compared with PSNLs to address specific issues where required; and
- Participation in the ILC RTCG and CLC (refer to Section 2.8 of NSW Ports OEMP) and any interagency working group established to address rail noise impacts along the dedicated rail freight line corridor.

If required further mitigation measures will be incorporated into NSW Ports OEMP and Tenant OEMPs following operation commencement. These would include location of container stacking, construction of partial enclosures over noise generating areas and strategic placement of operations/structures on site to provide shielding.

## **5. Noise Monitoring, Auditing and Reporting**

ILC Tenants will propose their own regimes of noise monitoring which will incorporate any compliance monitoring required to measure operational noise and ensure noise levels are in compliance with the noise levels outlined in Section 4 above, and any internal auditing processes to assess the performance of plant and equipment as per Condition of Approval 6.5(a) vii). These details will be incorporated into the Tenant ONMP.

Condition of Approval 3.3, outlines the requirement for Noise Auditing:

*Within 90 days of the project reaching annual throughput of 50,000 TEU, 150,000 TEU and 250,000 TEU, and within 30 days of commencement of operations in Empty Container Storage Area A, or as may be directed or agreed by the D-G, and during a period in which the project is operating under normal operating conditions, the Proponent shall undertake a program to confirm the noise emission performance of the project. The program shall include, but not necessarily be limited to:*

- noise monitoring, consistent with the guidelines provided in the New South Wales Industrial Noise Policy (EPA, 2000), to assess compliance with condition 2.17 of this consent;*
- methodologies, locations and frequencies for noise monitoring;*
- identification of monitoring sites at which pre- and post-project development noise levels can be ascertained;*
- details of any complaints received in relation to noise generated by the project;*
- an assessment of night-time use of audible alarm systems;*

- f) an assessment of the effectiveness of stacked empty containers as acoustic barriers in Empty Container Storage Area A;
- g) details of any noise mitigation measures and timetables for implementation;
- h) a statement of whether the site is in compliance with the noise limits outlined in condition 2.17; and
- i) recommendations and timetables for implementation for any reasonable and feasible additional measures necessary to ensure compliance with the relevant noise-related conditions of this approval.

NSW Ports will manage the process of noise auditing with assistance from ILC tenants where required. In addition, NSW Ports will manage the implementation of CoA 3.4 and 3.5 being:

*Within 28 days of conducting the noise monitoring referred to under condition 3.3 of this approval, the Proponent shall provide the Planning Secretary with a copy of the report. If the noise monitoring report identifies any non-compliance with the noise limits specified under this approval, the Proponent shall detail what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Planning Secretary.*

*Following consideration of the outcomes of the noise audits referred to under conditions 3.3 and 3.4 of this approval, the Planning Secretary may require the Proponent to implement additional noise mitigation, monitoring or management measures to address noise associated with the project. The Planning Secretary may require any or all of the measures proposed by the Proponent in the noise audit report, or other measures considered appropriate by the Planning Secretary (including on-site and off-site acoustic treatments, noise bunding, noise walls or noise attenuation works for plant and equipment) to be implemented. The Proponent shall implement the measures required by the Planning Secretary within such period as the Planning Secretary may specify.*

In the event that future monitoring/auditing demonstrates that additional noise mitigation is required, NSW Ports will coordinate this assessment in conjunction with ILC tenants. Additional investigative monitoring of noise may be commissioned and undertaken in response to specific complaints. All tenant and project approval specific noise monitoring results will be made available either on the tenant's website or the NSW Ports Enfield ILC webpage.

## 6. Complaints Management

In accordance with CoAs 5.2 and 5.3 and Section 2.3 of NSW Ports OEMP, NSW Ports has prepared a complaints and enquiries procedure to ensure complaints are dealt with adequately. As part of the procedure, NSW Ports has established a Complaints system to receive, log, track and monitor response to complaints within specified timeframes (refer to Section 2.4 of NSW Ports OEMP). NSW Ports HSE & Risk Manager will receive complaints and delegate to the relevant NSW Ports staff member or ILC Tenant to respond and is responsible for entering complaints and maintaining the Complaints system.

ILC Tenants are also required to establish a Complaints Register as per Section 2.3 of NSW Ports OEMP. ILC Tenants are required to provide a copy of their Complaints Register to NSW Ports as part of their compliance tracking report and during audits to demonstrate that any complaints received have been properly investigated and addressed.

The ILC enquiries and complaints contact number has been established, publicised, displayed on site and listed with a telephone company. Contact details for the public to make enquiries or lodge complaints about the project are:

### Office Hours (0830 – 1600 Monday to Friday)

- Telephone: 1300 922 524 (NSW Ports switchboard)
- Fax: (02) 9296 4119
- Postal: Enfield ILC HSE & Risk Manager, PO Box 297, Botany NSW 1455
- Email: [enquiries@nswports.com.au](mailto:enquiries@nswports.com.au)

Out of hours complaints can be left as a message, which will be responded to the next business day or if the matter is an emergency, the 1300 number has an option to direct the caller through to NSW Ports Port Operations Manager.

The Enfield CLC have also been provided with information on the complaints management procedure as a pro-active strategy, including which details to provide when making a complaint that will assist NSW Ports and ILC tenants in investigating and responding to complaints. Furthermore, operational updates will be provided to the CLC (and the local community where required) to advise of any relevant operational activities that have the potential to result in complaints.

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## Appendix H: Landscape and Ecological Area Management Plan

