



Caltex Australia

**ANNUAL REVIEW
ENVIRONMENTAL PERFORMANCE
DEVELOPMENT APPLICATION SSD 5544**

**CALTEX REFINERIES (NSW) PTY LTD
2 SOLANDER STREET
KURNELL NSW 2231**

Amended March 2016

TABLE OF CONTENTS

1	INTRODUCTION	3
PART 1 ENVIRONMENTAL PERFORMANCE OF THE TERMINAL AND SITE DEVELOPMENT ACTIVITIES		
1.1	DEVELOPMENT SUMMARY	4
1.2	DEVELOPMENT DURING THE PREVIOUS CALEDAR YEAR	5
1.2.1	Conversion Tank Bund Modifications	5
1.2.2	Electricity Consolidation for Terminal Operation	5
1.2.3	Plant and Instrument Air System	6
1.2.4	Potable Water Modifications	6
1.2.5	Tank Conversion	6
1.2.6	Demolition of Refinery Infrastructure	7
1.3	DEVELOPMENT FOR THE CURRENT CALENDAR YEAR	7
1.4	ENVIRONMENTAL MANAGEMENT CONTROLS	7
1.4.1	Air Quality Management Plans	8
1.4.2	Noise and Vibration Management Plans	8
1.4.3	Waste Management Plans	9
1.4.4	Soil and Water Management Plans	9
1.4.5	Biodiversity and Weed Management Plan	10
1.5	ENVIRONMENTAL PERFORMANCE AND MONITORING	10
1.6	NON-COMPLIANCE AND CORRECTIVE ACTION	13
1.7	DATA DISCREPANCIES	13
PART 2 ENVIRONMENTAL PERFORMANCE OF TERMINAL OPERATIONS ACTIVITIES		
2.1	TERMINAL OPERATIONS DURING THE PREVIOUS CALEDAR YEAR	14
2.2	TERMINAL ENVIRONMENTAL MANAGEMENT CONTROLS	14
2.3	TERMINAL ENVIRONMENTAL PERFORMANCE AND MONITORING	15
2.4	TERMINAL NON-COMPLIANCE AND CORRECTIVE ACTION	26
2.5	TERMINAL DATA TREND ANALYSIS	30
2.6	TERMINAL DATA DISCREPANCIES	30
PART 3 IMPROVEMENT PLAN AND SUMMARY		
3.1	POLLUTION STUDIES AND REDUCTION PROGRAMS (PRPS) ACTIVITIES IN 2015	31
3.2	KURNELL TERMINAL OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) DEVELOPMENT	32
3.3	PHYTOREMEDIATION AT SPENT CATALYST STORAGE AREA	32
3.4	PLANNED 2016 IMPROVEMENT MEASURES	33
4	SUMMARY	33

1 INTRODUCTION

Caltex Refineries (NSW) Pty Ltd (Caltex) has prepared this Progress Report to comply with Condition D4 – Annual Review in accordance with the Development Consent for application SSD 5544 (dated 7 January 2014). Condition D4 of the Consent states:

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

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

This Report presents a summary of the activities undertaken over the past twelve months, the proposed works for the next twelve months and the analysis and review required in the Consent condition. This report is divided in three parts:

- Part 1 – Environmental performance of the Terminal and site development activities
- Part 2 – Environmental performance of Terminal operations activities
- Part 3 – Improvement plan and summary

During the calendar year a modification to the conversion development, allowing the demolition of the refinery infrastructure, was approved. The activities carried out under this modification have been included in Part 1 as activities of development

PART 1 - ENVIRONMENTAL PERFORMANCE OF THE TERMINAL AND SITE DEVELOPMENT ACTIVITIES

1.1 DEVELOPMENT SUMMARY

The overall works program associated with the Development is summarised on Table 1 below. This table includes the commencement date and completion date for each activity.

TABLE 1- Overview of Activities in Development

Activity	Start	Stop
Tank Farm Automation	July 2012	December 2014
Tank 613 - Jet Conversion	July 2012	December 2013
Tank 603 - Jet Conversion	July 2012	May 2014
Slop Recovery, Storage, Transfer & Injection Upgrade	July 2012	December 2014
Fire Water System Modifications	October 2012	December 2014
Conversion Tank Bund Modifications	July 2012	June 2015
Electricity Consolidation For Terminal Operation	October 2012	December 2015
Dye, Stadis & Lubricity System	July 2012	September 2014
Tank 634 - Diesel Conversion	July 2012	April 2014
Tank 512 - Gasoline Conversion	July 2012	February 2014
Plant and Instrument Air System	October 2012	April 2015
Potable Water Modifications	October 2012	March 2015
OWS System Management	January 2013	December 2014
Tank Miscellaneous Nozzle Replacement	June 2013	December 2014
A-Line Gasoline Filter	October 2013	December 2014
Tank 633 – Diesel Conversion	October 2014	September 2016
Tank 413 – Gasoline Conversion	October 2014	March 2016
Tank 411 – Gasoline Conversion	October 2014	June 2016
Demolition of Refinery Infrastructure	September 2015	December 2017

1.2 DEVELOPMENT DURING THE LAST TWELVE MONTHS

The Development conducted over the previous calendar year is summarised on Table 2 with descriptions of the activities, the associated impacts and the controls provided in the following sub-sections. Included on this table is a summary of the potential environmental impacts which relate to the management plans prepared for the Development. Also included on the table are the actual number of incidents for each activity over the year.

TABLE 2 - Development Activities in 2015

Activity	Potential Environmental Impacts	Number of incidents
Conversion Tank Bund Modifications	Noise, Waste	Nil
Electricity Consolidation For Terminal Operation	Water, Biodiversity, Waste	Nil
Plant and Instrument Air System	Noise, Waste	Nil
Potable Water Modifications	Nil	Nil
Tank 633 – Diesel Conversion	Noise, Air Quality, Waste	Nil
Tank 413 – Gasoline Conversion	Noise, Air Quality, Waste	Nil
Tank 411 – Gasoline Conversion	Noise, Air Quality, Waste	Nil
Demolition of Refinery Infrastructure	Noise, Air Quality, Water, Biodiversity, Waste	Nil

1.2.1 Conversion Tank Bund Modifications

The conversion tank bund modifications ensure that bunds around tanks in Terminal service adhere to the relevant Australian Standard. The works included the construction of new earthen bunds within existing multi tank bunds to ensure each tank had its own discrete bunded compound. Minor earthworks were required for the handling and placement of new bund material.

The controls that have been established to manage the potential environmental impacts associated with conversion tank bund modifications are documented in the:

- Construction Noise Management Plan
- Construction Waste Management Plan

1.2.2 Electricity Consolidation for Terminal Operation

The electrical consolidation work required the installation of new power connections in the facility and the laying of cables. This requires construction activities and excavation for footings and cables.

The controls that have been established to manage the potential environmental impacts associated with electrical consolidation work are documented in the:

- Construction Water Management Plan
- Construction Waste Management Plan
- Construction Biodiversity, Pest and Weed Management Plan

1.2.3 Plant and Instrument Air System

The plant and instrument air system works involves the installation of some transfer pumps and piping including the construction of pump footings. Minor shallow excavation work (less than 100mm) which does not require the removal of vegetation.

The controls that have been established to manage the potential environmental impacts associated with plant and instrument air system works are documented in the:

- Construction Noise Management Plan
- Construction Waste Management Plan

1.2.4 Potable Water Modifications

The potable water modifications only require changes to existing plumbing on the site involving the connection of pipes. The works are limited to the modification of existing equipment and do not include the construction of new equipment. There are no potential environmental impacts associated with this work.

1.2.5 Tank Conversion

The Development conducted over the previous calendar year included the conversion of three tanks. Tank conversion works changes the product that can be stored in the tank. The following tanks were part of this year's conversion works:

- Tank 633 – Diesel Conversion
- Tank 413 – Gasoline Conversion
- Tank 411 – Gasoline Conversion

The activity involves the emptying and cleaning of the tank, internal modifications to the tank and repainting the tank. The potential environmental impacts associated with a tank conversion include the generation of wastes during the emptying and cleaning process and the generation of noise and dust during surface preparatory work before painting.

The controls that have been established to manage the potential environmental impacts associated with tank conversions are documented in the:

- Air Quality Management Plan
- Construction Noise Management Plan
- Construction Waste Management Plan

1.2.6 Demolition of Refinery Infrastructure

The demolition of the refinery infrastructure requires the removal of aboveground structures including vessels/heat-exchangers, piping and valve, pumps and compressors and underground pipes and services. This requires the felling of structures, cutting of vessels, piping and support structures and the excavation of underground pipework.

The controls that have been established to manage the potential environmental impacts associated with demolition works are documented in the:

- Demolition Environment Management Plan
- Air Quality Management Plan
- Noise and Vibration Management Plan
- Soil and Water Management Plan
- Demolition Waste and Resource Management Plan
- Biodiversity and Weed Management Plan
- Traffic Management Plan

1.3 DEVELOPMENT FOR THE CURRENT CALENDAR YEAR

The Development that will be conducted over the next twelve months is summarised on Table 3. Included on this table is a summary of the potential environmental impacts which relate to the management plans prepared for the Development.

TABLE 3 - Development Activities in 2016

Activity	Potential Environmental Impacts
Tank 633 – Diesel Conversion	Noise, air quality, waste
Tank 413 – Gasoline Conversion	Noise, air quality, waste
Tank 411 – Gasoline Conversion	Noise, air quality, waste
Demolition of Refinery Infrastructure	Noise, Air Quality, Water, Biodiversity, Waste

1.4 ENVIRONMENTAL MANAGEMENT CONTROLS

The activities completed during the previous calendar year involved the implementation of the controls and performance indicators documented in the following management plans for the Development:

- Air Quality Management Plans
- Noise and Vibration Management Plans
- Waste Management Plans
- Soil and Water Management Plans
- Biodiversity and Weed Management Plans

Included in these management plans are performance indicators and monitoring requirements.

1.4.1 Air Quality Management Plans

The following performance indicators within the Air Quality Management Plans that are required to be implemented during the Development are:

- No air quality complaints received.
- No visible emissions of dust from the premises.

The key monitoring requirements for air quality for the development are:

- Odour screening of excavated material.
- The Contractor will carry out regular visual monitoring to identify equipment producing excessive visible emissions.
- Contractors will carry out regular visual monitoring to identify areas generating dust.
- In the event of an odour complaint, an evaluation will be undertaken to confirm Project works are a potential source of odours. If Project work is confirmed as a potential ongoing odour source additional mitigation measures will be implemented which will include the use of water sprays to suppress odours and, if necessary, the use of odour suppressants. In the event of ongoing odours excavation activities will be stopped.
- Daily asbestos monitoring around area of activity.
- Dust monitoring around areas of activity.

1.4.2 Noise and Vibration Management Plans

The following performance indicators within the Construction Noise Management Plan that are required to be implemented during the Development are:

- No exceedances of the Noise Affected Management Level of LAeq(15min).
- No exceedances of the Structural Damage Vibration Criteria
- Community complaints received regarding conversion project related nuisance noise.
- Works carried out within the required hours and noise complaints managed.

Noise monitoring must be undertaken at the commencement of any work that has the potential to generate noise that could exceed the Noise Criteria Management Levels at the nearest sensitive receiver and the nearest sensitive down-wind receiver.

The key monitoring requirements noise monitoring for this Development:

- At the beginning of undertaking high noise generating activities (i.e. paint removal, demolition or metal fabrication) in close proximity (100m) to a specified receptor (R1-R8) noise monitoring will be carried.
- If high noise generating works are shown to exceed the required noise limits, or if noise complaints are received related to the high noise work, additional mitigation will be implemented for these activities (to ensure compliance with the required noise limits to the satisfaction of the Environmental Management Representative), such as:
 - The substitution of equipment or change the work procedure.
 - Acoustic screening.
 - Implement periodic breaks in undertaking high noise generating works. For example, working for 3 hours and stopping for 1 hour.

- If noise complaints are received which are not associated with high noise generating work but do relate to the Project then mitigation actions should be undertaken or noise monitoring undertaken.
- Noise monitoring must be undertaken at the nearest residential property to the source of noise and at the nearest residential property in Kurnell downwind from the source. Thus monitoring locations will vary dependent of any source of noise and the wind direction.
- Vibration monitoring will be conducted in the event that demolition is carried out within 20 m of any Site buildings to be retained

1.4.3 Waste Management Plans

The following performance indicators within the Construction Waste Management Plan that are required to be implemented during the Development are:

- No litter present on or around work areas.
- Appropriate segregation, storage and management of all waste and recyclable material.
- Environmental requirements included in procurement and subcontract documentation.
- 90% diversion of waste produced during demolition activities from landfill

The key monitoring requirements for this Development:

- The Contractor will record the types, volumes and management measures (i.e. reuse / recycling / disposal etc.) for wastes generated from its activities.
- The Contractor will carry out weekly inspections of its works areas to ensure wastes, chemicals and hazardous materials are appropriately stored and required procedures are being implemented.

1.4.4 Soil and Water Management Plans

The following performance indicators within the Water Management Plan that are required to be implemented during the Development are:

- All stockpiles managed in accordance with the relevant requirements in the latest version of the Managing Urban Stormwater: Soils and Construction Guideline.
- No silt runoff from stockpiles beyond the silt fencing.
- No significant increase in COPC levels in groundwater.
- No impacts to the environment from ASS or PASS.
- No environmental pollution incidents.

The key monitoring requirements for this Development:

- Sampling of all excavations for asbestos and visual and olfactory screening for hydrocarbons, using a PID where appropriate.
- Quarterly groundwater monitoring.
- Inspection of all stockpiles for erosion.

- Inspection of stormwater drains down gradient of work areas if erosion of stockpiles is observed.
- Any collected water within the bunded areas will be field tested for pH (to monitor for ASS). Treatment will be required if less than pH 6.5.

1.4.5 Biodiversity and Weed Management Plan

The following performance indicators within the Construction Biodiversity, Pest and Weed Management Plan that are required to be implemented during the Development are:

- Limited removal of vegetation.
- No disturbance to ‘tall tower’ structures used as perches.
- No disturbance to nesting shorebirds.
- Minimise potential disturbance to frog populations or habitats.

The key monitoring requirements for this Development:

- The Contractor will undertake pre-works inspections for frogs in excavations or work areas and take appropriate actions if observed.
- The Contractor will undertake pre-works inspections for nesting shorebirds in work areas and take appropriate actions if observed.
- The Contractor will monitor potential impacts to Marton Park Wetland after completion of the stormwater upgrade works, until otherwise agreed with Sutherland Shire Council, in accordance with the monitoring plan prepared by Caltex.
- The Contractor will undertake regular (weekly or as required) inspections of demolition areas as well as stockpiles for the presence of noxious and problematic weeds on site and in the surrounding areas and take appropriate actions if observed.

1.5 ENVIRONMENTAL PERFORMANCE AND MONITORING

The management plans prepared for this Development incorporate the mitigation measures specified in the EIS. Each management plan contains management actions, performance indicators and monitoring requirements.

A summary of the relevant management plan for each activity undertaken in the last twelve months, with potential environmental impacts, is presented in Table 4.

TABLE 4 - Performance Against Performance Indicators per Activity

Activity	Environmental Aspect	Environmental Impact	Performance Indicator	Monitoring Results	Non-Conformances
Tank Conversion	Tank cleaning	Waste management	Waste disposed of liquids to the oily water sewer system and soils to the landfarm	No recorded spills and all waste disposed of to oily water sewer or the landfarm	No non-conformances and no complaints
	Tank painting	Noise management	All paint removal work was completed during designated working hours using routine methodology that does not have the potential to generate significant noise	No out of hours work and no high noise work conducted within 100m of a residential property	No non-conformances and no complaints
	Tank painting	Air quality management	Paint removal undertaken with no visible emission of dust from the premises	No visible dust emissions from the premises. No lead paint removal.	No non-conformances and no complaints
Conversion tank bund modifications	Earthworks	Noise management	Work completed in designated working hours and all plant maintained and serviced	No out of hours work and no high noise work conducted within 100m of a residential property	No non-conformances and no complaints
	Earthworks	Waste management	Reuse of excavated material from the Development to construct the bunds	Records of waste volume for re-use in the waste database	No non-conformances and no complaints
Electrical consolidation	Excavation	Water management	Excavated material stockpile with silt control to minimise sediment erosion	No erosion	No non-conformances
	Excavation	Waste management	All excavations inspected for hydrocarbons and tested for asbestos with wastes classified for disposal	Records of waste volume in the waste database and asbestos waste removed and disposed	No non-conformances and no complaints
	Excavation	Biodiversity management	No vegetation removed and excavations inspected for frogs	No frogs observed in excavations	No non-conformances

Activity	Environmental Aspect	Environmental Impact	Performance Indicator	Monitoring Results	Non-Conformances
Plant and instrument air system	Excavation for concrete slab	Noise management	Work completed in designated working hours and all plant maintained and serviced	No out of hours work and no high noise work conducted within 100m of a residential property	No non-conformances and no complaints
	Excavation for concrete slab	Waste management	Excavated temporarily stockpiled prior to re-use within the Development	Records of waste volume for re-use in the waste database	No non-conformances and no complaints
Demolition Activities	Plant removal	Air quality management	Structure felling and plant removal undertaken with no visible emission of dust or odours from the premises	No visible dust emissions from the premises. No lead paint removal.	No non-conformances and no complaints
	Plant removal	Noise management	Structure felling undertaken and plant removal completed in designated working hours and without noise or vibration impact	No out of hours work and no high noise work conducted within 100m of a residential property	No non-conformances and no complaints
	Plant removal	Waste management	All plants and all excavations inspected for hydrocarbons and tested for asbestos. All waste streams classified for disposal	Records of waste volume in the waste database and asbestos waste removed and disposed	No non-conformances and no complaints
	Plant removal	Water management	Excavated material stockpile with silt control to minimise sediment erosion	No erosion	No non-conformances
	Plant removal	Biodiversity management	No vegetation removed and excavations inspected for frogs	No frogs observed in excavations	No non-conformances

1.6 NON-COMPLIANCE AND CORRECTIVE ACTION

The activities undertaken during the last twelve months had relatively low potential for the generation of environmental impacts. The activities with the highest potential for impacts were tank cleaning and painting and excavation associated with the electrical work as well as felling of tall structures.

Tank cleaning generates significant volumes of liquid waste including residual hydrocarbons and cleaning fluids. The residual hydrocarbons have, as far as practicable, been collected for recycling in the slop system. Cleaning fluids have been treated at the waste water treatment plant and solids have been disposed of at the on-site landfarm or have been transferred to a suitable off-site disposal facility. Tank painting has the potential to generate noise and dust during surface preparation work.

The excavation activities associated with the electrical consolidation project involved the removal of significant quantities of soil for the installation of cables then the backfilling of the excavations. This process resulted in most excavated soil being re-used as backfill. Excavations were generally backfilled promptly minimising the potential for fauna to enter the excavations. Excess material was managed through the site waste management system.

The felling of tall structures was preceded by the removal of all hydrocarbon and asbestos material (as far as practicable). Dust and noise monitoring was carried out during the actual felling activity.

There were no conformance issues associated with any of the activities completed and no community complaints associated with any of the development activities of the Development. (For community complaints received during the last twelve months see Part 2 Terminal Operations.)

1.7 DATA DISCREPANCIES

The management actions within the management plans were developed from the mitigation measures in the EIS. Based on the performance of the development activities over the last twelve months, the management actions appear to be appropriate for this project. There were no conformance issues recorded over the previous year.

PART 2 - ENVIRONMENTAL PERFORMANCE OF TERMINAL OPERATIONS ACTIVITIES

2.1 TERMINAL OPERATIONS DURING THE PREVIOUS CALEDAR YEAR

2015 was the first full calendar year for Terminal operation at the Kurnell site. In this year the Terminal:

- Processed over 5 billion litres of fuel for the NSW and ACT markets.
- Berthed over 120 ships on three berths.
- Managed an extensive product quality and product assurance program.
- Completed a comprehensive maintenance program.
- Assumed responsibility for the running of the site's Waste Water Treatment Plant.
- Managed a comprehensive Environment Management System (EMS)

The Terminal operated without any major process safety incidents.

2.2 TERMINAL ENVIRONMENTAL MANAGEMENT CONTROLS

The Terminal operations are governed by a comprehensive Environment Management System which is ISO14001 accredited. The most recent ISO 14001 surveillance audit was carried out in the period 30 November till 2 December. No major or minor non-conformances were issued. The auditor made several observations and highlighted areas for improvement. All these observations are currently under review considering implementation. (The Surveillance Audit Report will be issued to DP&E under separate cover.)

The current Terminal EMS was based on the refinery's EMS and all documentation to run and govern an effective EMS are in place. To ensure consistency within documentation and procedural control these EMS documentations are being transferred and converted to Terminal documents. As part of this transition a Terminal OEMP-document is being developed. The benefit of this document is that all relevant environmental information, requirements and controls are captured in one spot.

One of the bases for the EMS is the site's Environment Protection Licence (Lic No: 837). This licence describes the activities that are performed on the site and as well as the required controls and monitoring. The licence governing the performance of the old refinery was converted to the current licence, governing the Terminal, in late April (effective 1 May 2015). The monitoring section of the licence describes 5 Monitoring and Discharge Points. For details see Table 5:

TABLE 5 - Description of Monitoring and Discharge Points

EPA Identification No	Type of Monitoring or Discharge Point	Location Description
1	Discharge to waters	Cooling water pipe discharging into Botany Bay labelled "1" on drawing No. 18588 titled "Environment Protection Licence EPA Identification Points" submitted to the EPA with letter on 15 June 2007. Note: Monitoring is at Point 26 and Point 33.
2	Discharge to waters	Submerged ocean outfall at Yena Gap labelled "2" on drawing No. 18588 titled "Environment Protection Licence EPA Identification Points" submitted to the EPA with letter on 15 June 2007. Note: Monitoring is at Point 27.
15	Groundwater quality monitoring	Bioremediation plot (landfarm) - permanent monitoring well PWM 8 labelled "15" on drawing No. 18588 titled "Environment Protection Licence EPA Identification Points" submitted to the EPA with letter on 15 June 2007
16	Groundwater quality monitoring	Bioremediation plot - (landfarm) permanent monitoring well (PMW) 33 labelled "16" on drawing No. 18588 titled "Environment Protection Licence EPA Identification Points" submitted to the EPA with letter on 15 June 2007.
27	Effluent quality and volume monitoring	Sampling port in wastewater treatment plant labelled "27" on drawing No. 18588 titled "Environment Protection Licence EPA Identification Points" submitted to the EPA with letter on 15 June 2007. Note: Discharge is at Point 2.

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

2.3 TERMINAL ENVIRONMENTAL PERFORMANCE AND MONITORING

In this section a summary is provided of the environmental performance of the Terminal against its Environmental Protection Licence and the Conditions of Consent for SSD 5544. Table 6A-F shows the summary of monitoring results for the licenced monitoring points 15 and 16 for the calendar years 2015-2011.

Table 7 contains the annual summary of the monitoring results for Monitoring Point 27.

Table 8 contains a summary of the asbestos monitoring (air) results during asbestos removal activities in 2015. This monitoring will continue for the duration of the asbestos removal program on site.

Table 9 contains a summary of the Dust monitoring during high dust potential during demolition activities. It was started in August 2015.

Table 10 and Figure 1 provide an overview of the calls made to the 24 Hour Community Complaints Hotline.

TABLE 6A - Licensed Monitoring/Discharge Points: 2015

Monitoring Period	2015								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.002	<0.001	4.83	3.236	<0.002	<0.050	<0.05	<0.002
Highest	<0.001	<0.002	<0.001	5.57	3.932	<0.002	0.055	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.002	<0.001	5.548	1.555	<0.002	<0.050	<0.05	<0.002
Highest	<0.001	<0.002	<0.001	5.90	1.814	<0.002	0.017	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 6B - Licensed Monitoring/Discharge Points: 2014

Monitoring Period	2014								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	
Lowest	<0.001	<0.001	<0.001	4.21	3.433	<0.001	0.035	<0.05	<0.001
Highest	<0.001	<0.001	<0.001	5.86	4.934	<0.001	0.055	<0.05	<0.001
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.63	1.779	<0.001	0.035	<0.05	<0.001
Highest	<0.001	<0.001	<0.001	6.49	2.370	<0.001	0.180	<0.05	<0.001
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 6C - Licensed Monitoring/Discharge Points: 2013

Monitoring Period	2013								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	
Lowest	<0.001	<0.001	<0.001	4.95	2.925	<0.001	0.035	<0.05	<0.001
Highest	<0.002	<0.002	<0.001	6.40	4.846	<0.002	0.055	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.001	<0.001	5.91	1.553	<0.001	0.075	<0.05	<0.001
Highest	<0.002	<0.002	<0.001	6.29	2.279	<0.001	0.44	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 6D - Licenced Monitoring/Discharge Points: 2012

Monitoring Period	2012								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	
Lowest	<0.002	<0.002	<0.001	4.81	3.581	<0.002	0.035	<0.05	<0.002
Highest	<0.002	<0.002	<0.001	5.43	4.927	<0.002	0.070	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.002	<0.002	<0.001	5.850	1.874	<0.002	0.012	<0.05	<0.002
Highest	<0.002	<0.002	<0.001	6.130	2.167	<0.002	0.032	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TABLE 6E - Licensed Monitoring/Discharge Points: 2011

Monitoring Period	2011								
Pollutant	Benzene	Ethyl Benzene	Lead	pH	Standing Water Level	Toluene	Total Petroleum Hydrocarbons	Total Phenolics	Xylene
Unit of Measure	mg/L	mg/L	mg/L	pH units	m	mg/L	mg/L	mg/L	mg/L
Licence Limit	None	None	None	None	None	None	None	None	None
Monitoring Frequency Required by Licence	Quarterly								
EPA Point	Point 15, PMW08								
No. Samples Collected	4	4	4	4	4	4	4	4	
Lowest	<0.001	<0.002	<0.001	5.33	3.124	<0.002	0.035	<0.05	<0.002
Highest	<0.001	<0.002	<0.001	5.75	4.577	<0.002	0.035	<0.05	<0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA Point	Point 16, PMW33								
No. Samples Collected	4	4	4	4	4	4	4	4	4
Lowest	<0.001	<0.002	<0.001	5.548	1.589	<0.005	0.01655	<0.05	<0.002
Highest	0.003	<0.002	<0.001	6.120	2.333	<0.005	0.470	<0.05	0.002
Exceedance (yes/no)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Table 7A – Point 27: Normal Operation Conditions

Monitoring Period	2015									Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Normal Operating Conditions									
Pollutant	Temperature	pH	Volumetric Flowrate	Oil and Grease	Phenols	Sulfide (un-ionised hydrogen sulfide)	Nitrogen (ammonia)	Total Suspended Solids	Biochemical Oxygen Demand	
Unit of Measure	°C	pH units	kl/day	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Licence Limit	40	6.0 - 9.0	None		2.7	None				
Monitoring Frequency Required by Licence	Continuous			6 Day						
Averaging Period	1 Hour Block	6 Minute Rolling	1 Day Block	Grab Sample						
No. Samples Collected	7992	483520	332	52	52	52	52	52	52	No Missing Data
Lowest	13.78	6.6	0	<5	<0.05	0.009	0.01	<1	<2	
Highest	29.00	8.3	15535	8	<0.05	0.026	0.33	29	10	
Exceedance (yes/no)	No	No	N/A	No	No	No	No	No	No	

Table 7B – Point 27: Normal Operation Conditions

Monitoring Period	2015										Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Normal Operating Conditions										
Pollutant	Arsenic	Ethyl Benzene	Lead	Naphthalene	Nickel	Phenanthrene	Benzene	Toluene	Polycyclic Aromatic Hydrocarbons	2,4-Dimethylphenol	
Licence Limit		None		None		None	None	None	0.5	None	
Unit of Measure	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	
Monitoring Frequency Required by Licence	Monthly										
Averaging Period	24 Hour Composite Sample										
No. Samples Collected	12	12	12	12	12	12	12	12	12	12	
Lowest	0.004	<0.002	<0.001	<0.0005	0.002	<0.0004	<0.001	<0.002	<0.0005	<0.0004	
Highest	0.022	<0.002	0.004	0.0012	0.018	<0.001	<0.001	<0.002	<0.0015	<0.001	
Exceedance (yes/no)	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	
											No Missing Data

Table 7C – Point 27: Wet Weather Bypass Conditions

Monitoring Period	2015				Reason for Missing Data
EPA Point	Point 27, Yena Gap Effluent, Wet Weather Bypass Conditions				
Pollutant	Oil and Grease (Wet)	Phenols (Wet)	Total Suspended Solids (Wet)	Biochemical oxygen demand (Wet)	
Unit of Measure	mg/l	mg/l	mg/l	mg/l	
Licence Limit	70	5	100	350	
Monitoring Frequency Required by Licence	Daily during Wet Weather Bypass				
Averaging Period	Grab Sample				
No. Samples Collected	1	1	1	1	Wet Weather Bypass was only used in April.
Lowest	7	<0.05	8	4	
Highest	7	<0.05	8	4	
Exceedance (yes/no)	No	No	No	No	

Air Monitoring Program

Asbestos Removal

A range of asbestos removal activities were undertaken in the 2015 period during the decommissioning phase (first half 2015) and the demolition phase (8 August 2015 onward). The focus was on the removal of friable asbestos from redundant pipes in the pipeway infrastructure, furnaces, columns and heat exchanges in scheduled plant areas. The Kurnell Occupational Hygienist conducted the air monitoring program and is a SafeWork NSW Licensed Asbestos Assessor - LAA000145.

Table 8 – Asbestos Monitoring

No of Air Samples taken in 2015	No. of Exceedances	NSW SafeWork >0.02 Fibres/millilitre of air sampled	NSW Depart Health & Caltex action level >0.01 Fibres/millilitre of air sampled (new in 2015)
597	nil	nil	nil

In accordance with site excavation procedures, soil was also tested for the presence of friable asbestos by using phase contract microscopy prior to excavation being undertaken. All contaminated soils were removed and disposed in accordance with correct asbestos handling and NSW EPA waste management requirements.

Demolition Dust

Dust monitoring was commenced in August 2015, at the start of the demolition phase. A DustTrak 3480 real time monitor was used by the Kurnell Occupational Hygienist for this purpose.

Monitoring was undertaken daily and downwind at the fence boundary of the demolition area in question. Additional dust monitoring was undertaken during drops of structures where the drop was determined as having a high potential for dust generation.

Table 9 - Dust Monitoring Results

No. Dust Samples taken 2015	No. of Exceedances	Threshold Limit
268	nil	50 µg/m ³

Note: The first AS3580 dust deposition analysis result for December 2015 gave a maximum 2.4 g/m²/month result against the NEPM of 4 g/m²/month.

Community Complaints

During the reporting period 60 calls to the 24 Hour Community Complaints Hotline were received. Table 10 shows the breakdown of these calls based on the category of the complaint. Complaints are followed up immediately with an investigation into the potential cause of the complaint and corrective actions were required. The outcome of the investigation and the actions taken is provide during a phone call to the complainant. As can be seen noise was the category which was complaint about most. Further details regarding Caltex's response to noise is provided in Section 2.4 Corrective Actions. Figure 1 shows the breakdown of the complaints by month over the reporting period.

Table 10 - Community Complaints Monitoring

Number of Complaints Recorded During the Last Twelve Months	
Pollution Complaint Category	Number of Complaints
Air	21
Water	2
Noise	32
Waste	0
Other	5
Total	60

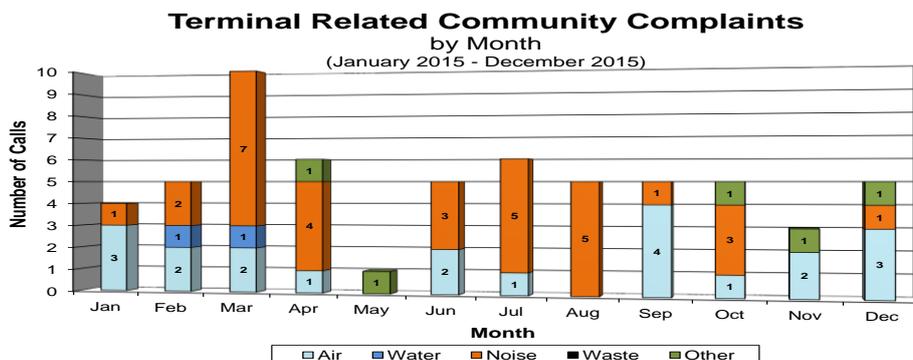


Figure 1

Traffic Management Plan - Effectiveness Monitoring

The effectiveness of the Traffic Management Plan was measured against:

Table 11 - Motor Vehicle incidents

	No.	
Category 0 (<20kms)	3	<ol style="list-style-type: none"> 1. As the vehicle moved away from the parked position a concrete cable marker that protrudes from the ground approximately 900mm made contact with the side of the utility- minor paint damage 2. Driver of small truck was seen exceeding the local speed limit of 10 kms along internal site road – has assume it was 25kms as before. 3. While reverse parking, driver caused vehicle to travel too far in parking space and made contact with building.
Category 1 (>20kms or other)	1	<ol style="list-style-type: none"> 1. Semi- Trailer load contacted Electric supply cables to House while executing a left hand turn at Kurnell. Load was below 4.6mtr restriction level. Cable to house found to below standard installation height. The Council and Ausgrid have installed a Power Pole to the front of the property which raised the power cables to an approved and acceptable elevation.

Note: All incidents were investigated with actions completed and verified by assigned completion dates.

- Inclusion of Kurnell traffic management plan principals and Driver Code of Conduct included in the Terminal and Demolition Induction packs
- Written and approved road closure plans included in daily tool box talks prior to event.
- Health, Safety, Security and Environment (HSSE) inspections which occurred weekly. Includes checks for adherence to any specific traffic management plan for area and general parking behaviour e.g. rear to kerb parking, keys left in vehicle, etc.
- Regular vehicle speed checks within the Kurnell site boundaries by the security team.

Pest, Vermin & Noxious Weed Management Monitoring

The effectiveness of the management plan in place to detect and eradicate pest, vermin & noxious weed is measured by:

- Contractor and Caltex employees undertake regular (weekly or as required) inspections of demolition areas as well as stockpiles for the presence of noxious and problematic weeds on site and in the surrounding areas and take appropriate actions if observed.
- Caltex *Permit to Work* Issuers inspect work areas prior to permits being issued. This inspection also provides an opportunity to check the work area for the presence of noxious and problematic weeds, pests and vermin. If found, the Issuer will inform the Demolition Environment Team (areas under Demolition project control) or the Kurnell Terminal Maintenance Manager to arrange corrective action.

- Demolition Environment Team undertaking monthly site inspections of all demolition work areas to ensure that management plan measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in surrounding area. The Inspection checklist used includes requirements to check for noxious and problematic weeds, pests and vermin. If found, the Environment Team arranges for the affected area/s to be treated by approved contractors. All chemicals used are on the Caltex approved list.

2.4 TERMINAL NON-COMPLIANCE AND CORRECTIVE ACTION

Based on the data presented in the previous section no exceedances were recorded against the licence limits for the three monitoring points.

As can be seen from Table 10, the main impact on the community is noise. In particular, the noise that members of the community observe from ship activities. When a noise complaint is received the sound level is measured with a handheld sound meter close to the complainants' place of residence (if operations permit). Based on those observations no exceedances were observed during the year.

However, due to the number of noise complaints received, a better understanding of the basis for the complaints was required. Therefore, noise measurements were carried out over longer periods of time. Even though it appeared that sound levels at some residences were exceeding the Terminal's noise limits, the noise generated by the Terminal activities (including the ship activities) could not be separated from noise generated by other sources such as traffic, airplanes, other ship traffic on Botany Bay, fauna and community.

A Noise Consultant has been engaged to carry out further noise assessment, including assessments on the wharf, and to develop a noise model for the ship activities at the Caltex Kurnell wharf. It is expected that the report from the consultant will be issued in the first quarter of 2016.

As a corrective measure, a standard letter/form has been developed which can be used to:

- Alert the ship of the proximity to the local community
- Alert the ship to existing noise level restrictions
- Advise ships on measures which they can take to limit noise whilst in Port at Kurnell

The Letter was issued to all Shipping agents and the noise minimisation measures are communicated to ship captains via the Ship Discharge procedure, at the time of berthing.

All other community complaints (regarding odour, dust or otherwise) were all investigated immediately and appropriate actions were implemented. Feedback was provided to the complainer regarding the cause of the impact and the actions taken to prevent it from happening. Generally, the community has been appreciative of the way any complaints were handled.

During 2015 five Non-Compliances have been reported as well. The details of these non-compliances and a summary of the actions taken can be found in Table 12.

On 16 December 2015 a severe tornado struck Kurnell. This resulted in a loss of power to the Terminal and the shutdown of operations, along with widespread damage to buildings and fencing across the site and in the secondary right of way.

The loss of power rendered the site's Waste Water Treatment Plant inoperable, which resulted in some strong odours from the oily stormwater that quickly accumulated due to the massive volume of rain. Despite a number of emergency measures being put in place, there was a small release of oily stormwater water to Botany Bay. A comprehensive response was immediately put in place by the Kurnell team and Sydney Ports to disperse the oily stormwater. Subsequent inspections have shown no further traces of oily stormwater.

Table 12. Summary of Non Compliances

Date	Description of Non-Compliance	Cause of Non-Compliance	Corrective Actions to Prevent Non-Compliance
9 January 2015	Small release of ballast water occurred when a temporary 65 mm flexible hose split during a flushing operation on the Kurnell wharf.	The non-compliance was caused by a failed check-valve and a failed 65 mm flexible hose	<ul style="list-style-type: none"> • All check-valves will be inspected/tested prior to any use by a suitably qualified person. • All 65mm flexible hoses have been included in a preventative maintenance schedule. • Review Flushing Procedure, Job Safety Analysis and Permitting processes • The outcomes of the investigation have been discussed with all shift teams and contractors
13 February 2015	Small spill of diesel from the Kurnell wharf during high pressure water cleaning at the old cooling water pump house (CWPH).	The diesel spill occurred when the diesel line of the contractor's generator failed.	<ul style="list-style-type: none"> • An amendment was made to current procedures of Caltex's Contractor plant/equipment inspection processes to provide greater assurance and confidence concerning the integrity of contractor plant and equipment. • Communicate and reinforce with Caltex contractors the change in the plant/equipment inspection processes. • Undertake a stand-down session specific to the wharf to raise awareness of the spills, in particular to water. Ensure that all personnel who undertake or authorise work to be conducted on the wharf, attend or partake in the stand-down information session or receive information on the expectations. • Implement and communicate the requirement for secondary containment measures to be undertaken for all plant/equipment where there is a risk of hydrocarbon product being spilt.
20 April 2015	Progress Report 3 for the Bio Pile Pilot Trial was submitted on 20 April 2015 after the due date of 16 April 2015.	Report submission dates are contained within an automated system and on this occasion the reminders were not forwarded to acting manager covering the reporting person's role during the period of annual leave.	<ul style="list-style-type: none"> • Automated reminder system to be part of detailed handover for reporting person for future annual leave.

Date	Description of Non-Compliance	Cause of Non-Compliance	Corrective Actions to Prevent Non-Compliance
27 October 2015	Loss of Containment (LOC) of Diesel from Density Gauge on No. 3 Sub Berth Receiving Line Kurnell Terminal Wharf	A densitometer was not firmly fitted due to two internal screws being loose creating the potential for a gap between the instrument and the adaptor plate, allowing the loss of containment.	<ul style="list-style-type: none"> • The spill was contained by a drip tray on the underdeck, and the contents recovered via the wharf slops system. The spill directly on to the underdeck was cleaned up with absorbent pads. • The loose densitometer was removed for investigation and replaced with a spare unit. • The other 14 installed densitometers on the wharf were inspected, and one was found to be loose and subsequently repaired. • The supplier of the densitometers was then contacted, and confirmed that there is a history of these units becoming loose due to the two internal screws becoming loose. When asked about how this is to be rectified, they recommended the use of LOCTITE™ or equivalent on the screws.
27 November 2015	Failing to publish monitoring data	Report publishing dates are contained within an automated system and due to internal restructure the reminders were not forwarded to the new person responsible.	<ul style="list-style-type: none"> • Automated reminder system and detailed reporting protocols and database to be set-up.

2.5 TERMINAL DATA TREND ANALYSIS

After only one full calendar year of Terminal operations, there is no compliance or compliant history to undertake data trend analysis

2.6 TERMINAL DATA DISCREPANCIES

The Terminal EMS used to govern the environmental aspects and impacts seems to be appropriate. The processes under the EMS ensure that relevant data is generated and reported. This also allows for gaps to be identified and gap closing plans to be developed and implemented.

PART 3 – 2015 IMPROVEMENT PLAN AND SUMMARY

This section of the report provides an overview of the improvement works that have been carried out during the reporting period. This includes: works carried out as part of the EPL's Pollution Reduction Program, development of the Terminal's OEMP, Phytoremediation works and an overview of the improvement works planned for 2016.

3.1 EPA LICENSE 837: POLLUTION STUDIES AND REDUCTION PROGRAMS (PRPS) ACTIVITIES IN 2015

U2.1 PRP U16.2: Implementation of the Tank Sleeve Program

Caltex has committed to install sleeves on slotted guide poles on 12 External Floating Roof Tanks (EFRTs) that will be in Gasoline service after the transition from a refinery to a Terminal. This new program will result in more than one tank being upgraded during the conversion program and establishes a framework for upgrading all EFRTs.

The tank sleeve program will be implemented in three parts. Part one and two will be carried out during the conversion program. Part three will be carried out as part of the ongoing tank maintenance program at the Kurnell Terminal.

The first 4 EFRT's were upgraded in 2014. The upgrade of a further 6 EFRTs has commenced and the Phase 2 upgraded will be completed by end 2017, as per agreed EPL timeframe.

U2.2 PRP U18.2: Implement Threatened Species Management Strategies

Implementation of threatened species management strategies, in accordance with the Kurnell Threatened Species Management Plan.

Specific threatened species management strategies have been included in:

- Kurnell Demolition Biodiversity and Weed Management Plan (BWMP)
- Industrial Demolition Services Environmental Site Management Plan
- Kurnell Terminal Operational Management Plan (OEMP)

In practical terms, workers are required to check habitats for fauna and threatened species flora prior disturbing the area for works such as excavations, use of fauna barriers at excavations (where deemed appropriate or possible), checking of all excavations each morning for any fauna that may have entered the excavation overnight and backfilling of excavations as soon as practicable. Such checks are part of the daily work area inspections. The Excavation Checklist has a Fauna Fences needed check box included. Fauna fencing is required during the work on the ConCarb line and is discretionary for process areas based on location and daily inspection process.

The Demolition induction program include details on the strategies to use to protect potential threatened species on site.

U4.2 PRP U25.2: Wastewater Characterisation and Risk Assessment

Undertake the Wastewater Survey and Risk Assessment in accordance with the agreed methodology as developed in PRP U25.1 unless otherwise agreed in writing by the EPA. A

report must be prepared and submitted to the EPA detailing the results of the survey. The Report is due by 31 March 2016

Waste water samples were collected over a 5 week period, in accordance with a detailed sampling schedule. All samples have been analysed by ALS. The wastewater collected during the 5 week period is representative of expected future flow inputs. The sampling data will be use to assist with the “future state” design of the Terminal Wastewater Treatment Plant.

3.2 KURNELL TERMINAL OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN (OEMP) DEVELOPMENT

In line with the requirements of Obligation D2 of SSD 5544, a Kurnell Terminal Operational Environmental Management was developed. The Plan includes all the stated elements in the sub text of D2 and D3.

An internal Audit tool has been developed to assist with monitoring compliance to and effectiveness of the OEMP. It is currently being reviewed by key stakeholders before being published.

3.3 PHYTOREMEDIATION AT SPENT CATALYST STORAGE AREA

Over the last 3 and a half years, the Kurnell site has remediated an area where previously spent Phosphoric Acid Catalyst used to be stored. The area was remediated by neutralising and encapsulating the spent catalyst and by planting 100 sterile poplar trees. The poplars have helped to remediate the locally contaminated groundwater, reducing the level of dissolved phosphate. Figure 2 show that reduction in a number of wells over time.

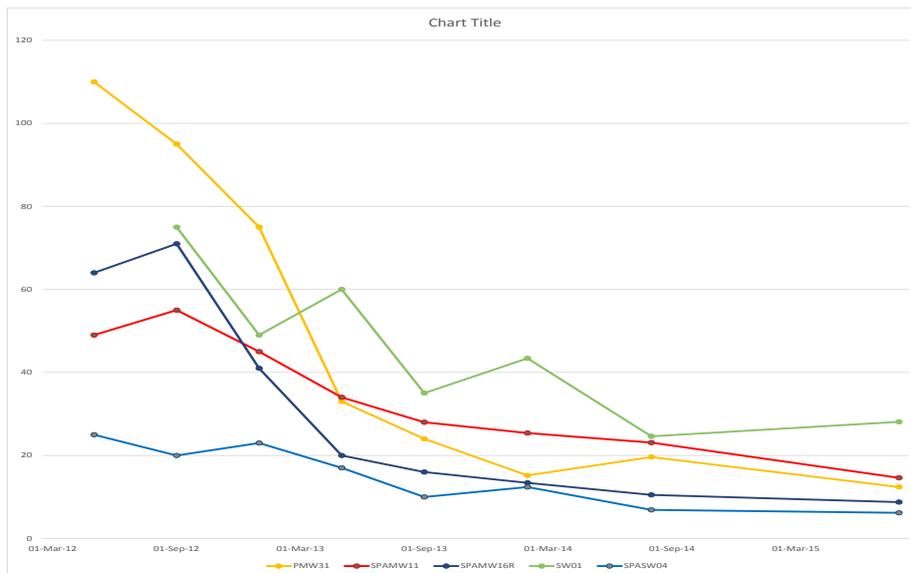


Figure 2, Reduction in Phosphate Concentration in Groundwater

3.4 PLANNED 2016 IMPROVEMENT MEASURES

The proposed improvement measures for 2016 include:

- Assessment of the new Kurnell Terminal OEMP against the new ISO 14001: 2015 Environmental Management Systems Standard, identify any gaps and develop and action plan in readiness for the planned recertification in June 2017.
- Implementation of the 2016 Internal Audit program.
- Commence “Future State” Redesign of Kurnell Terminal WWTP
- Development of Kurnell Terminal EPL in association with NSW EPA
- Kurnell Terminal OE Marine Improvement Program

4 SUMMARY

Over the previous year, activities associated with the development have complied with the Development Consent for Application SSD 5544 (dated 7 January 2014) and Development Consent for Modification 1 of SSD 5544 (dated 10 August 2015).

The environmental management activities developed from the EIS and the EPL, incorporating the consent conditions, have been effective and will be continued for the current year.

As the Demolition phase of the project only started in August 2015, no data trends have been developed over the previous calendar year. Going forward, the extent of data will increase allowing for more detailed analysis.