



Vopak Terminals Australia Pty Ltd
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Nov 22, 2024

To whom it may concern,

NSW Department of Planning

Dear Sir/ Madam

Subject: Action plan for non-compliances from Independent Environmental Audit

Please see below action plan related to non-compliances identified in Independent Environmental Audit conducted by Geosyntec on 20 February 2023.

Action Plan for NCs related to MP06_0089				
Condition No	Details of NC	Recommendations from Geosyntec	Action/ Response from Vopak	Due Date
MP06_0089 Schedule 3- -9G	This condition is considered non-compliant as evidence of submission of the Hazard Audit report to SafeWork NSW was unable to be sighted.	Hazard audit report must also be submitted to SafeWork NSW.	The next Hazard Audit is planned in 2025 for MP06_0089 and SSD 7000. Reports will be submitted to all due parties.	December 2025

A Royal Vopak Company
Vopak Terminals Sydney Pty Limited
ABN 67 004 754 750

Action Plan for NCs related to MP06_0089				
Condition No	Details of NC	Recommendations from Geosyntec	Action/ Response from Vopak	Due Date
MP06_0089 Schedule 3-17	The Auditor notes that the following result did not meet EPL requirements but was not reported in the annual return: Oil & grease (12mg/L) exceedance in Lab report 303913 (sample date 24/08/2022) was not reported on 1 July 2022 to 30 June 2023 annual return	All exceedances to EPL should be reported in the Annual Return. Vopak must ensure that the stormwater discharges comply with the requirements of the EPL.	No further action. All exceedances have been reported since then.	Completed.
MP06_0089 Mod 2 Schedule 4-5	This condition is considered non-compliant because the Audit is not completed within 2 months of commissioning of the audit, noting that there is inconsistency with the SSD 7000, which requires submission of audit report within 3 months instead of 2 months.	As the Audit under MP06_0089 is conducted concurrently with the Audit under SSD7000, approval from the Planning Secretary should be sought to allow the same report submission time as the SSD7000	This issue was discussed with DPHI and no further action required	Completed

Action Plan for NCs related to MP06_0089				
Condition No	Details of NC	Recommendations from Geosyntec	Action/ Response from Vopak	Due Date
		requirement for future audits		
MP06_0089 Mod 2 Schedule 4-6	This condition is considered non-compliant as there was no evidence of OEMP review following the last 2023 IEA.	After this Independent Environmental Audit, Vopak must review and if necessary, revise plans/strategies/programs required under this approval. Any revised plan/strategies/programs must be submitted.	OEMP review will be conducted and if there is any amendment, new OEMP will be submitted to DPHI.	28/02/2025
MP06_0089 Mod 2 Schedule 4-8	Compliance reporting was not carried out in accordance with the Compliance Reporting Post Approval Requirements every year following the approval of MP06-0089 Mod2.	Compliance report must be conducted in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) or its modification (subject to approval by DP&E).	Compliance report will be provided to DPIE	31/12/2024

Action Plan for NCs related to SSD 7000				
Condition No	Details of NC	Recommendations from Geosyntec	Action/ Response from Vopak	Due Date
B5 (a)	This item has been considered as compliant as the plan has been submitted to DPIE in 2021, but evidence of approval has not been obtained.	The approval for the Emergency Plan should be obtained from the Planning Secretary, if it has not been obtained.	Emergency Plan has been submitted to DPHI portal for approval. No further action required.	Completed.
B14 (a)	This condition has been considered noncompliant from the last audit because, evidence of submission of the OEMP that includes the EMM Air Quality Management Plan was unable to be sighted.	If not yet obtained, approval from the Secretary on the AQMP should be obtained. Considering there have been some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval.	OEMP will be submitted with AQMP within 3 months of the audit to DPHI.	28/02/2025
B15 (a)	This condition is considered non-compliant as the post-commissioning air emissions report was unable to be sighted	If not already conducted, Vopak should conduct a post-commissioning air emissions report as per	Vopak already performs Vapour Recovery Performance test. However, a suitably qualified person will be engaged to review the reports and conduct any emission testing as required. Report will be submitted to DPHI.	31 July 2025

	during the current and previous audit	the Condition B15. Evidence of this will need to be sighted in subsequent audit.		
B16(a)	This item has been considered as non-compliant since the previous audit due to absence of evidence that shows internal roads, driveways and parking are constructed and maintained in accordance with the latest versions of AS 2890.1 & AS 2890.2 and the sweep path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTRROADS	If not yet obtained, a certificate for compliance must be obtained from a suitably qualified consultant to demonstrate that internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.	Vopak doesn't believe this is required as the site corresponding to SSD 7000 is an un-manned site and there is no truck movement in that site.	Completed
B27	This condition is considered as	If not yet obtained, approval from the	Amended OEMP will be submitted to DPHI	28/02/2025

	non-compliant since the previous audit as evidence of OEMP and sub-plans submission to DPHI and their approval was unable to be sighted. it is noted that Planning Secretary provided a new due date for submission (31 October 2024).	Secretary on the Water Management Plan should be obtained. Considering there are some changes to the OEMP, the full OEMP and sub-plans should be submitted to the Planning Secretary for approval		
C4	This condition is considered non-compliant because the approval of OEMP was unable to be sighted.	OEMP approval should be obtained to meet Condition C4 of SSD consent.	As above	
C8	This item is considered non-compliant as no evidence of OEMP review was able to be sighted within 3 months of the previous IEA.	The OEMP must be reviewed and revised (if required) within 3 months of a modification of development consent or an incident report.	As above	
C10	This item is considered non-compliant as the 2024 groundwater monitoring reports is not accessible	Applicable environmental performance reports such as groundwater	The delay is due to website being managed by Global Vopak based in Netherlands and some personnel change within the team. We expect to display the result	31/12/2024



	via the project website at the time of the audit.	monitoring reports shall be provided on Vopak Sydney website and kept up to date.		
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Please do not hesitate to contact me if you require further information.

Kind Regards,

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SHEQ Manager

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