

9 STATEMENT OF COMMITMENTS

9.1 Introduction

In accordance with the EARs issued under Part 3A of the EP&A Act, the following Statement of Commitments (SoC) is provided. The SoC states Orica’s environmental commitments and details on the environmental management and monitoring of the proposed project during its construction and operational activities.

Orica commits to the preparation and implementation of the environmental management and monitoring plans and environmental mitigation measures detailed in the SoC for the proposed remediation works as detailed below.

9.2 Statement of Commitments

The SoC prepared in respect of the proposed remediation of the CPWE has been compiled on an issues basis and is informed by the issues prioritisation and impact assessment undertaken as part of this EA. The SoC has been written in a format which can be incorporated into any project approval issued to act as the conditions of that approval.

Table 9-1: Statement of Commitments

Environmental Issue	Commitment
Statutory Requirements	<p style="text-align: center;">1</p> <p>Prior to the issue of an Environment Protection Licence (EPL) for the project, the Department of Environment and Conservation (DEC) shall be provided with sufficient and appropriate documentation for a Technology Assessment to be undertaken by the DEC in accordance with the <i>National Protocol Approval/Licensing of Technologies for the Treatment/Disposal of Schedule X Wastes</i> and the <i>National Protocol Approval/Licensing of Commercial-Scale Facilities for the Treatment/Disposal of Schedule X Wastes</i>. Orica shall construct and operate the development generally in accordance with the specification outlined in the Technology Assessment document provided to the DEC, unless otherwise agreed by the DEC.</p>

Environmental Issue	Commitment
Soil Remediation Requirements	<p>2 Materials shall only be processed through the DTD Plant where those materials have matrices, contaminant constituents and contaminant concentrations which have been proven as acceptable for processing during Commissioning Proof of Performance (CPoP) trials.</p> <p>3 Orica shall manage all materials and wastes containing Scheduled Chemical Waste (SCW) and polychlorinated biphenyls (PCBs) in accordance with the applicable Chemical Control Order, or in accordance with a licence under the <i>Environmentally Hazardous Chemicals Act 1985</i>.</p> <p>4 Orica shall process materials intended to be retained on the CPWE site that do not meet the Remediation Goals detailed in the Remedial Action Plan (RAP), and any wastes generated by the treatment process until the materials/wastes meet:</p> <ul style="list-style-type: none"> • The Remediation Goals specified in the RAP; • A statistical average dioxin, furan and dioxin-like PCB WHO-TWQ of less than 1 µg/kg determined with a methodology acceptable to the DEC; • An aggregate concentration of SCW constituents of less than 2 mg/kg; and • A PCB concentration of less than 2 mg/kg <p>Note: Where the above cannot be practically achieved or demonstrated (technical and economical), another best practice standard would be agreed with the DEC.</p>
Air Quality	<p>5 Plant associated with the remediation works shall be selected and operated to ensure that emissions are below the maximum allowable emission concentrations discussed in Section 8.1 of the Environmental Assessment (EA), or where that is not possible to an agreed best practice standard.</p> <p>6 Contaminated material excavation and handling activities shall be completely enclosed within the Excavation Soil Building (ESB) and Feed Soil Building (FSB).</p> <p>7 Orica shall design, construct, operate and maintain a ventilation system(s) for the ESB and FSB so that air flow is drawn into the buildings and discharged via the emission control systems.</p> <p>8 The thermal oxidiser (being the major piece of emission control equipment) shall be designed to meet the requirements of best practice in terms of destruction efficiency and air pollutant emissions.</p> <p>9 Air monitoring/air discharge points for monitoring will be as described below:</p> <ul style="list-style-type: none"> • DTD Plant exhaust stack; • ESB emission control system stack; and • FSB emission control system stack. <p>10 A monitoring program shall be designed for each of the ESB, FSB and DTD emission control systems and stacks. The monitoring programs shall include:</p>

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	<ul style="list-style-type: none"> • Monitoring of ESB, FSB and DTD Plant and emission control system components for specified flows, pressures and temperatures; • Continuous monitoring of the ESB and FSB emission control system for parameters such as relative humidity, pressure, temperature and volatile organic compounds (VOCs); • Continuous monitoring of the DTD Plant stack for flow rate, temperature, oxygen, oxides of nitrogen (NOx) and carbon monoxide (CO) concentrations (CO provides feedback on the efficiency of combustion in the thermal oxidiser); and • Periodic discrete sampling of the ESB, FSB and DTD stacks for a range of combustion pollutants and/or contaminants. <p>11 The treatment plant stacks shall be fitted with sampling port(s) in accordance with the relevant Australian Standard and safe access provided for stack sampling.</p> <p>12 An ambient monitoring program shall be conducted to monitor fugitive emissions from the treatment plant to ensure that all site emissions limits are complied with.</p> <p>13 Orica shall design, construct, commission, operate and maintain the development to ensure that at each discharge point identified in Commitment 11, the concentration of each pollutant listed does not exceed the maximum allowable discharge concentration limit specified for that pollutant in the table below:</p> <p>Discharge Point 1 - DTD Exhaust</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>100 percentile concentration limit⁽¹⁾</th> </tr> </thead> <tbody> <tr> <td>Cadmium</td> <td>mg/m³</td> <td>0.01</td> </tr> <tr> <td>Carbon monoxide⁽³⁾</td> <td>mg/m³</td> <td>125</td> </tr> <tr> <td>Chlorine⁽³⁾</td> <td>mg/m³</td> <td>200</td> </tr> <tr> <td>Dioxins & Furans⁽⁴⁾ (WHO-TEQ)</td> <td>ng/m³</td> <td>0.1</td> </tr> <tr> <td>Hydrogen chloride⁽³⁾</td> <td>mg/m³</td> <td>100</td> </tr> <tr> <td>Hydrogen fluoride</td> <td>mg/m³</td> <td>35</td> </tr> <tr> <td>Mercury⁽⁵⁾</td> <td>mg/m³</td> <td>1.0</td> </tr> <tr> <td>Nitrogen Oxides⁽⁶⁾</td> <td>mg/m³</td> <td>205</td> </tr> <tr> <td>Solid Particles</td> <td>mg/m³</td> <td>25</td> </tr> <tr> <td>Sulphuric acid mist and sulphur trioxide (as SO₃)⁽⁷⁾</td> <td>mg/m³</td> <td>75</td> </tr> <tr> <td>Type 1 and Type 2 substances in Aggregate^{(2) (5)}</td> <td>mg/m³</td> <td>1.0</td> </tr> </tbody> </table> <p>(1) At standard reference conditions, i.e. Dry, 273 K, 101.3 kPa, 10% O₂.</p> <p>(2) "Type 1 and Type 2 substances in aggregate" means the sum of the concentrations of Antimony, Arsenic, Cadmium, Lead, Mercury, Beryllium, Chromium, Cobalt, Manganese, Nickel, Selenium, Tin and Vanadium.</p> <p>(3) These concentration limits would be reviewed following commissioning and proof of performance testing and lower limits proposed based on the test results.</p>	Pollutant	Units of measure	100 percentile concentration limit ⁽¹⁾	Cadmium	mg/m ³	0.01	Carbon monoxide ⁽³⁾	mg/m ³	125	Chlorine ⁽³⁾	mg/m ³	200	Dioxins & Furans ⁽⁴⁾ (WHO-TEQ)	ng/m ³	0.1	Hydrogen chloride ⁽³⁾	mg/m ³	100	Hydrogen fluoride	mg/m ³	35	Mercury ⁽⁵⁾	mg/m ³	1.0	Nitrogen Oxides ⁽⁶⁾	mg/m ³	205	Solid Particles	mg/m ³	25	Sulphuric acid mist and sulphur trioxide (as SO ₃) ⁽⁷⁾	mg/m ³	75	Type 1 and Type 2 substances in Aggregate ^{(2) (5)}	mg/m ³	1.0
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	<p>(4) At 11% O₂.</p> <p>(5) Mercury may exceed the maximum allowable stack concentration in which case a best practice standard would be developed. Type 1 and Type 2 substances in aggregate may also exceed solely because they include mercury.</p> <p>(6) The estimated NO_x is below the allowable stack concentration limit but close to the maximum allowable GLC limit. If the results of the commissioning and testing showed that compliance with allowable GLCs was an issue the following corrective actions would be evaluated: decreasing the rotary dryer burner temperature, decreasing the thermal oxidiser burner temperature and increasing the stack height.</p> <p>(6) SO₃ is below the maximum stack concentration limit but near a maximum allowable GLC limit. If the results of the commissioning and testing showed that compliance with allowable GLCs was an issue the following corrective actions would be evaluated: treating SO₃ by lime addition to the baghouse; and increasing the stack height.</p>																														
	<p style="text-align: center;">Discharge Point 2 - ESB emission control system stack</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pollutant</th> <th style="width: 20%;">Units of measure</th> <th style="width: 30%;">100 percentile concentration limit ⁽¹⁾</th> </tr> </thead> <tbody> <tr> <td>Cadmium</td> <td>mg/m³</td> <td>0.1</td> </tr> <tr> <td>Mercury</td> <td>mg/m³</td> <td>0.1</td> </tr> <tr> <td>Solid Particles</td> <td>mg/m³</td> <td>10</td> </tr> <tr> <td>Type 1 and Type 2 substances in Aggregate ⁽²⁾</td> <td>mg/m³</td> <td>0.5</td> </tr> </tbody> </table> <p>(1) At standard reference conditions, i.e. Dry, 273 K, 101.3 kPa.</p> <p>(2) "Type 1 and Type 2 substances in aggregate" means the sum of the concentrations of Antimony, Arsenic, Cadmium, Lead, Mercury, Beryllium, Chromium, Cobalt, Manganese, Nickel, Selenium, Tin and Vanadium.</p> <p style="text-align: center;">Discharge Point 3 - FSB emission control system stack</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Pollutant</th> <th style="width: 20%;">Units of measure</th> <th style="width: 30%;">100 percentile concentration limit ⁽¹⁾</th> </tr> </thead> <tbody> <tr> <td>Cadmium</td> <td>mg/m³</td> <td>0.1</td> </tr> <tr> <td>Mercury</td> <td>mg/m³</td> <td>0.1</td> </tr> <tr> <td>Solid Particles</td> <td>mg/m³</td> <td>10</td> </tr> <tr> <td>Type 1 and Type 2 substances in Aggregate ⁽²⁾</td> <td>mg/m³</td> <td>0.5</td> </tr> </tbody> </table> <p>(1) At standard reference conditions, i.e. Dry, 273 K, 101.3 kPa.</p> <p>(2) "Type 1 and Type 2 substances in aggregate" means the sum of the concentrations of Antimony, Arsenic, Cadmium, Lead, Mercury, Beryllium, Chromium, Cobalt, Manganese, Nickel, Selenium, Tin and Vanadium.</p> <p>14 Orica shall design, construct, operate and maintain all stacks associated with the project in accordance with detail provided in this EA as well as good engineering practice in order to minimise the effects of stack tip downwash and building wake effects on ground-level air pollutant concentrations.</p> <p>15 Orica shall not permit any offensive odour to be emitted from the remediation works beyond the boundary of the BIP, as defined under section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p>	Pollutant	Units of measure	100 percentile concentration limit ⁽¹⁾	Cadmium	mg/m ³	0.1	Mercury	mg/m ³	0.1	Solid Particles	mg/m ³	10	Type 1 and Type 2 substances in Aggregate ⁽²⁾	mg/m ³	0.5	Pollutant	Units of measure	100 percentile concentration limit ⁽¹⁾	Cadmium	mg/m ³	0.1	Mercury	mg/m ³	0.1	Solid Particles	mg/m ³	10	Type 1 and Type 2 substances in Aggregate ⁽²⁾	mg/m ³	0.5
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	<p>16 Orica shall design, construct, commission, operate, maintain and decommission the project in a manner that minimises or prevents dust emissions from the Site. Orica shall seek to ensure that the system is designed such that there are no visible dust emissions from the Site.</p> <p>17 A Construction Environmental Management Plan (CEMP) shall be prepared in respect of the proposed remediation works detailing mitigation measures to be implemented during the construction period including:</p> <ul style="list-style-type: none"> • Access to the CPWE to be via existing sealed roadways only; • Water (or other appropriate control measure) shall be used to suppress particles potentially generated during the erection of boundary fences, barriers and screens; • Land clearing activities shall be controlled using water suppression where necessary; • Areas of disturbed soil shall be minimised during the construction period; • Water (or other appropriate control measure) shall be used to suppress dust emissions during dry windy periods (as required); • The height from which dust generating material is dropped shall be minimised; • Loaded trucks carrying contaminated materials shall be covered at all times; • The cutting/grinding of materials on site shall be kept to a minimum. Where cutting or grinding is necessary equipment and techniques to minimise dust will be used; • Soil mounds shall be treated with surface binding agents or sealed by seeding or surfacing with vegetation or covered with secured tarpaulins or other suitable material; • Heavily used areas shall be paved; • Paved areas shall be swept when necessary using a vacuum sweeper; • Wheels of site plant and vehicles shall be cleaned to minimise the spread of mud onto surrounding roads; • Exhaust emissions from mobile plant shall not discharge straight at the ground; • Construction plant and vehicles will be well maintained and regularly serviced. Visible smoke from plant should be avoided. Defective plant will not be used; • Engines shall be switched off when vehicles are not in use and refuelling areas will be away from areas of public access; • Loading and unloading shall take place within the Site; and <p>18 Waste removed from site will be disposed to an appropriately licensed waste facility.</p>

Environmental Issue	Commitment
Noise	<p>19 The DTD Plant and associated plant shall be sourced/designed with the objective of achieving the noise goals set out in Orica's EPL. The following general mitigation measures shall be considered in the detailed design of the plant in order to achieve the required noise reductions.</p> <ul style="list-style-type: none"> • Plant layout and orientation shall be designed to minimise noise impacts. • ECS and DTD Plant fans to incorporate silencers and enclosures to achieve appropriate noise reductions. • Solid barriers shall be incorporated, wherever reasonably practicable at noise sources at a height. • Plant items shall be located at lower heights where reasonably practicable such that noise shielding from the FSB is maximised. Plant shall be located to the west of the DTD Plant. • A flexible connection may be used between the fan and ductwork in the DTD Plant stack. The connection may be encased to control break out noise. • Ductwork, including the stacks shall be acoustically lagged if required. This shall be confirmed with measurement once operational and lagging retrofitted if needed. <p>Details of the above measures and noise reductions achieved shall be provided to the Department of Planning (DoP) during the detailed design stage of the project.</p> <p>20 Orica shall prepare a Construction Noise and Vibration Management Plan (CNVMP) in respect of the project addressing the following:</p> <ul style="list-style-type: none"> • Appropriate noise monitoring program for the project including details of periodic noise and vibration testing to be undertaken during activities deemed likely to generate high noise and vibration levels; • Management of vibration during any use of piling rig and roller; • Scheduling of works/respice periods from activities likely to generate high levels of noise during major sporting events at Hensley Athletics Field; and • Provision of a 24 hour community hotline to allow the local community to register complaints regarding noise at the Site. <p>21 Orica shall ensure that works on the Site are carried out in accordance with the following:</p> <ul style="list-style-type: none"> • All CPWE excavation operations shall be undertaken within the enclosed ESB in between the hours of 7.00am and 7.00pm from Monday to Saturday; • All operations undertaken within the enclosed FSB (screening, crushing, blending of stockpiled materials and feeding material to the DTD Plant) and the operation of the DTD Plant may be undertaken 24 hours per day, seven days per week; •



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	<ul style="list-style-type: none"> • All other works including stockpile management, maintenance of drainage and environmental control measures, and the maintenance of haul roads will be undertaken between the hours of 7.00am and 7.00pm from Monday to Saturday; • All equipment and plant used on-site will be maintained in good order in accordance with manufacturers recommendations; and • All construction vehicles will enter and exit the Site in accordance with the Site entry controls specified in the EA and RAP prepared for the project.
Social	<p>22 An ongoing consultation program will be undertaken with the local community for the duration of the project. A Community Liaison Plan will be prepared for the project including the following key components;</p> <ul style="list-style-type: none"> • A database shall be prepared identifying all key stakeholders in the proposed remediation works. Over the course of the project, the database shall be updated regularly and will be used to document communications with key stakeholders and interested parties. • Appropriate communications tools will be used to distribute information to identified stakeholders prior to establishment of works at the CPWE. The tools shall contain information relating to the proposed CPWE remediation works, a project program showing the anticipated duration of works, opportunities for key stakeholder participation and contact details for more information. • Regular meetings, focusing solely on the remediation of the CPWE, will be held to disseminate information on the progress of the works including information on incidents, issues and operational conditions, and be attended by technical specialists, where necessary, to address any specific concerns or issues that may arise. These meetings will be open for anyone to attend. • The CPRC will continue to be a key stakeholder during the project and project information will be provided and discussed with the Committee. • Newsletters shall be prepared and distributed to key stakeholders to communicate project information. The newsletters shall provide an avenue for communicating specific information on the progress of the remediation works where appropriate. Feedback on the information shall be collected via the consultation methods described above. • A dedicated 24-hour, 1800 telephone number/service shall be established to answer queries on the project and to receive comments and shall be available throughout the duration of the project. • A notice board shall be posted at the main site entrance containing information about the project and contact details. • Information about the project shall be posted on the web. The website shall be advertised to key stakeholders and regularly updated.

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Traffic	<p>23 A Traffic Management Plan (TMP) shall be prepared for the project prior to site establishment and construction. The TMP shall incorporate existing Botany Industrial Park (BIP) traffic management procedures and include:</p> <ul style="list-style-type: none"> • Designated site access via Gate 3 on Denison Street for all construction and operational traffic; • The use of existing workforce car parking and heavy vehicle unloading areas within the BIP; • Designated haulage routes within the BIP for heavy vehicle movements; and • Compliance with designated speed limits and load limits specified for heavy vehicle routes.
Water and Soils	<p>24 Orica shall apply all practicable measures to reduce the quantity of dirty water, and the concentration of contaminants contained in dirty water, produced as a result of site establishment, construction, operation and decommissioning works for the project.</p> <p>25 Orica shall take all practicable measures to:</p> <ul style="list-style-type: none"> • Minimise soil erosion and the discharge of sediments and pollutants from the Site; and • Reduce both the concentration of contaminants contained in dirty water and the total quantity of dirty water produced as a result of site establishment, construction, operation and decommissioning works for the project. <p>26 In relation to the management of the water cycle on the Site, Orica shall implement measures designed to ensure that:</p> <ul style="list-style-type: none"> • Stormwater from contaminated areas within the Site is transferred to the on-site water treatment plant associated with the project and is not permitted to contaminate clean areas of the Site; • All contaminated water within the Site is collected and treated in an on-site water treatment plant, or disposed of off-site to a wastewater treatment facility lawfully permitted to accept such waste; and • Water to be reused on the Site meets the criteria specified in the Environmental Management Plan developed in accordance with Commitment 44. <p>27 Orica shall ensure that material that is to be stockpiled on site is stabilised to prevent contamination, erosion or dispersal of the material.</p> <p>28 With respect to the reuse of wastewater Orica shall ensure that:</p> <ul style="list-style-type: none"> • Wastewater/effluent is applied to the Site strictly in accordance with an approved Environmental Management Plan (EMP) as described in Commitment 44 with respect to water volumes, quantities and application areas; • Reuse of contaminated water/effluent on site meets the requirements of NSW Health and WorkCover NSW as relevant;



Environmental Issue	Commitment
	<ul style="list-style-type: none"> • Contaminated water/effluent to be reused on site is tested and verified as safe for site workers and local residents, and will not contaminate clean areas. <p>29 In the event that wastewater from the Site is to be discharged to sewer, Orica shall establish a (or modify an existing) Trade Waste Agreement with Sydney Water Corporation and comply with the conditions of the Agreement at all times.</p>
Hazards and Risks	<p>30 Prior to the commencement of commissioning of the treatment plant (DTD Plant) as part of the Technology Assessment, Orica shall submit to the Director-General a full description of the treatment process, together with process flow diagrams and other relevant information at various points in the process, such as temperatures, pressures, flow rates and contaminants with their physical state.</p> <p>31 Prior to the commencement of commissioning of the development, in accordance with an approved CPOP Program, the following documents will be prepared:</p> <ul style="list-style-type: none"> • an Emergency Plan for the development. The Plan shall be prepared in accordance with the Department's publication <i>Hazardous Industry Planning Advisory Paper No. 1 – Industry Emergency Planning Guidelines</i>. The Plan shall be developed in consultation with relevant emergency services, the CPRC and broader community and the DEC; • a Safety Management System, covering all parts of the project and any associated transport activities involving hazardous materials. The System shall clearly specify all safety-related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to safety procedures. The System shall be developed in accordance with the Department's publication <i>Hazardous Industry Planning Advisory Paper No. 9 – Safety Management</i>. <p>32 Orica shall successfully rehearse the Emergency Plan referred to under Commitment No. 30 of this Statement of Commitments on at least one occasion during the commissioning of the treatment plant or proof of performance trials. The rehearsal shall include a simulated response to a full-scale emergency at the development and shall involve relevant key stakeholders, including but not necessarily limited to relevant emergency services and adjacent landowners.</p> <p>33 Prior to site establishment, appropriate Occupational Health and Safety (OH&S) and planning activities will be completed, documented and approved, where necessary. These activities include:</p> <ul style="list-style-type: none"> • Verifying the OH&S training of all employees and subcontractors scheduled to work at the Site; • Medical examinations for all employees and subcontractors who are to work at the Site and are exposed to contamination; • Documented attendance at an on-site safety induction briefing for all employees and subcontractors scheduled to work at the Site;

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	<ul style="list-style-type: none"> • Appointment of a Site Safety Officer (SSO); • Provision of first aid and medical facilities and supplies at the Site; • The procurement, provision and training in the use of personal protective equipment (PPE) detailed in the OH&S Plan (OHSP) and works procedures; • Completion of all quality assurance (QA) and maintenance checks on all electrical equipment, plant and tools to be used at the Site at the commencement of works. Scheduled on-going checks will be performed on all plant and equipment brought on-site; • Installation of decontamination units at the specified areas on the Site, as detailed in the OH&S Plan and the design drawings; and • All activities required to provide a safe and healthy work environment for all personnel who work or visit the Site. <p>34 Prior to site establishment, WorkCover NSW shall be notified of the proposed commencement date for site works.</p> <p>35 Prior to the commencement of construction on the Site, the following studies shall be prepared:</p> <ul style="list-style-type: none"> • a Fire Safety Study for the project, covering all aspects detailed in the Department's publication Hazardous Industry Planning Advisory Paper No. 2 – Fire Safety Guidelines and the NSW Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems. The Study shall include a strict maintenance schedule for essential services and other safety measures. The Study shall be submitted for the approval of the Commissioner of the NSW Fire Brigades prior to submission to the Director-General; • a Hazard and Operability Study (HAZOP) and Control Hazard and Operability Study (CHAZOP) of the project chaired by an independent, qualified person or team. The independent person or team shall be approved by the Director-General. The Study shall be carried out in accordance with the Department's publication Hazardous Industry Planning Advisory Paper No 8 – HAZOP Guidelines; • a Construction Safety Study for the project, prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 7 – Construction Safety Standards. <p>36 The construction and operation of the proposed project shall be undertaken using an appropriate OH&SP for construction workers on the Site as well as long-term employees at the facility. The plan shall include the preparation of safe work method statements to address specific activities as outlined within the Preliminary Hazard Analysis (PHA) prepared for the proposal.</p>
Completion of Works	Orica shall engage an independent site auditor accredited under the <i>Contaminated Land Management Act 1997</i> to endorse the RAP and for the duration of the remediation of the CPWE site, ultimately providing 'sign-off' for the site audit statement.

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Environmental Management	<p>37 Standard operating procedures (SOPs) shall be developed for all plant items relating to the development, including but not limited to procedures for the handling of contaminated soils, operation of major process units and operation of pollution control equipment. The SOPs shall identify critical operating parameters for each item of plant, identifying appropriate operating levels for each parameter and indicating how these parameters will be monitored. Subject to confidentiality, copies of the Procedures shall be made available for inspection by the Director-General, the DEC and the community on request.</p> <p>38 Operation of the development shall be conducted strictly in accordance with the SOPs referred to in Commitment No. 37 at all times. SOPs shall be updated to reflect significant changes to operations that may occur from time to time. Orica shall periodically notify the Director-General and the DEC of any update of the SOPs, indicating the scope and nature of the update.</p>
Environmental Management Plans	<p>39 Prior to the commencement of site preparation or construction works on the Site, an EMP shall be prepared to identify key issues and to provide a management strategy to effectively manage the environment for the duration of the project and the remediation activities considered to potentially have an adverse impact on the environment. The EMP will address the following key issues:</p> <ul style="list-style-type: none"> • Surface water management; • Management of water in excavations; • Air quality management including dust, gaseous emissions and odours; • Noise management; • Vibration; • Waste management; • Equipment operation; and • Traffic control.

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<p>Environmental Reporting</p>	<p>40 Orica shall notify the DEC and the Director-General of any environmental incident occurring during the project with actual or potential significant off-site impacts on people or the biophysical environment as soon as practicable after becoming aware of the incident. Orica shall provide full written details of the incident to the DEC and the Director-General within seven days of the date on which the incident occurred. Orica shall make a copy of the report available for public inspection on request.</p> <p>41 If Orica identifies, through monitoring or otherwise, an exceedance of environmental or safety limits specified in this SoC or the EPL for the Site, Orica will take all necessary steps to cease and prevent the recurrence of the exceedance (subject to safe shutdown procedures). Unless the exceedance can be rectified within a reasonable period of time, Orica shall notify the Director-General and the DEC of the cause of the required shutdown and identify additional measures to be applied to address the cause of the exceedance and identify additional measures to be applied to address the cause.</p> <p>42 Orica shall, throughout the life of the project, prepare and submit to the Director-General and the DEC, a Monthly Performance Report. The Report shall review the performance of the development against the relevant requirements set out in this SoC and the EPL and shall include:</p> <ul style="list-style-type: none"> • All monitoring data collected for the development during the month; • A copy of the complaints register for the month and how these complaints were addressed and resolved; • Identification of any non-compliance with the conditions of approval or the EPL; and • Details of additional measures to be implemented to address any non-compliance with the conditions of approval or the EPL. <p style="padding-left: 40px;">43 Six months after the commencement of operation of the project, and then annually on the anniversary of the commencement of operation, Orica shall commission an independent, qualified person or team to undertake an Environmental Audit of the project. An Environmental Audit Report shall be submitted to the Director-General within one month of the completion of the Audit. The Audit shall:</p> <ul style="list-style-type: none"> • Be carried out in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing; • Be carried out in accordance with the requirements of the approval issued in respect of the project, and other licences and approvals that apply to the project; • Assess the environmental performance of the project against the predictions made and conclusions drawn in the EA; and



Environmental Issue	Commitment
	<ul style="list-style-type: none"><li data-bbox="564 280 1350 376">• Review the effectiveness of the environmental management of the project, including any environmental impact mitigation works. <p data-bbox="504 394 1350 456">The Environmental Audit Report shall be made available for public inspection on request.</p>



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