

WAREHOUSE OCCUPATION ENVIRONMENTAL MANAGEMENT PLAN

Moorebank Logistics Park

Moorebank Logistics Park

Warehouse Occupation Environmental Management Plan

Author Richard Swift; Olivia Ajagamelle

Checker Mathew Williams

Approver Richard Johnson

Report No J001831.201215.3

Date 15/12/2020

Revision Text Rev 3

Author Details

Author Details	Qualifications and Experience
Richard Johnson	BSc Dip Law. 28 years environmental planning, assessment and management. Across water/ resources/ energy/ industrial/ infrastructure sectors.
Richard Swift	ICert NEBOSH (Management of Hazardous Agents). 22 years WHS&E construction and operation management, systems and auditing.
Olivia Ajagamelle	Master Quality, Safety and Environment Management Systems. ISO 14001 Lead Auditor. 10 years construction environmental management, auditing and management systems.

Revisions

Revision	Date	Description	Prepared by	Approved by
1	11/11/20	First Draft issued for client review	O. Ajagamelle R. Swift	R. Johnson
2	27/11/20	Final incorporating client comments	O. Ajagamelle M. Williams	R. Johnson
3	15/12/20	Final issue incorporating DPIE comments	O. Ajagamelle M. Williams	R. Johnson

This plan and any subsequent revisions are controlled documents. Any alterations to this document shall be recorded on the above revisions table, and the current document updated and maintained on the site accessible document file.

CONTENTS

1 INTRODUCTION	2
1.1 Background	2
1.2 Purpose and Objectives of this WOEMP	2
2 OPERATIONS	4
2.1 Operator Details	4
2.2 Site Description	4
2.3 Description of Operations	5
2.4 Safety, Health and Sustainability Policy	5
3 ENVIRONMENTAL MANAGEMENT	6
3.1 Environmental Structure and Responsibility	6
3.2 Delivery and Maintenance Responsibility	6
3.3 Environmental Management Overview	7
3.4 Development Approvals	8
3.5 Roles and Responsibilities	9
3.6 Training	10
3.6.1 Site Induction	10
3.6.2 Dangerous Goods Training	11
3.7 Environmental Incidents and Emergencies	11
3.7.1 Incident Management	11
3.7.2 Emergency Contact Details	12
4 IMPLEMENTATION – ENVIRONMENTAL MANAGEMENT	13
4.1 Risk Management	13
4.2 Management Measures	13
4.3 Compliance with B114 Dangerous Goods Thresholds	18
4.4 Identification of Dangerous Goods	18
4.4.1 Screening Thresholds of Dangerous Goods	26
4.4.2 Identification of Quantities of Dangerous Goods	26
4.4.3 Annual and Weekly Road Movements	26
4.4.4 Material Incompatibility	27
5 MONITOR AND REVIEW	28
5.1 Environmental Monitoring	28
5.1.1 Site Inspections	29
5.1.2 Environmental Management Plan Audit and Reporting	29
5.2 Environmental Management Records	29
5.3 Non-Conformance and Corrective Actions	29
5.4 Complaints Handling	30

APPENDICES

APPENDIX A ENVIRONMENTAL INSPECTION CHECKLIST

APPENDIX B MECHANICAL PLANT AND EQUIPMENT NOISE ASSESSMENT

APPENDIX C DANGEROUS GOODS SCREENING THRESHOLDS AND SUPPORTING INFORMATION

LIST OF TABLES

Table 2-1	Operator details
Table 3-1	Applicable CoC to WH5 operations
Table 3-2	Roles and responsibilities
Table 3-3	Emergency contact details
Table 4-1	Management measures
Table 4-2	Classes of dangerous goods
Table 4-3	SafeWork NSW Placard and Manifest Quantities information for Dangerous Goods (Refer to NSW WHS Regs 2011, Schedule 11)
Table 4-4	Chemical storage POEO Act scheduled activity criteria
Table 4-5	Annual and weekly hazardous material vehicle movement thresholds.
Table 5-1	Monitoring and reporting requirement summary
Table 5-2	Plant and equipment and associated sounds levels

LIST OF FIGURES

Figure 2-1	WH5 site layout within the WH5 lease area
Figure 3-1	Precinct management structure
Figure 3-2	Relationship between Qube's Precinct OEMP, required under CoC C3, and this WOEMP

ACRONYMS AND DEFINITIONS

Acronym / Term	Meaning
ADG	Australian Code for the Transport of Dangerous Goods by Road & Rail (National Transport Commission, Edition 7.7, 2020)
AQMP	Air Quality Management Plan
CoC	Condition of Consent
DPIE	Department of Planning, Industry and Environment
EMC	Estate Management Company. Entity responsible for management of warehouse operations.
Environmental Incident	A set of circumstances resulting in harm, or potential harm, to the environment. Environmental incidents include pollution incidents and environmental emergencies. Environmental incidents may arise from natural (e.g. storm, wind or bushfire) or human factors.
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
IMEX	Import Export Terminal
Material harm	Material harm is harm that: <ul style="list-style-type: none"> • Involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or • Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
MLP	Moorebank Logistics Park
Moorebank Logistics Park	Refers to the entire Moorebank intermodal precinct, i.e. the MPE and the MPW.
MPE	Moorebank Precinct East
MPW	Moorebank Precinct West
NVMP	Noise and Vibration Management Plan
OEH	Office of Environment and Heritage
OEMP	Precinct (MPE) Operational Environmental Management Plan
OTAMP	Operational Traffic and Access Management Plan
PDC	Project Delivery Company. Entity responsible for delivery of the MPE development.
Pollution Incident	A set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise (POEO Act).
SSD	State significant development
WOEMP	Warehouse Occupation Environmental Management Plan

1 INTRODUCTION

1.1 Background

SIMTA received approval for the construction and operation of MPE Stage 1 on 12 December 2016 (SSD 6766) and MPE Stage 2 on 31 January 2018 (SSD 7628), under the MPE Concept Approval (MP10_0193).

The MPE Site comprises:

- An IMEX facility (including container storage and handling)
- Eight warehouses
- A freight village and
- Common areas including access ways, internal roads, landscaping and drainage and stormwater infrastructure.

Section 4.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) identifies that a person must not carry out development on land where a consent is required for that development and must only carry out the development in accordance with the consent and the instrument. This means that the conditions of consent (CoC) issued in respect of Development Consent SSD 7628 are binding on both the applicant undertaking the development (Qube Holdings) and on all lessees and tenants who undertake the suite of activities that comprise the development for the respective terminal, warehouse and freight village operations.

SSD 7628 provides CoC in respect of warehousing operations for the MPE site. Preparation of a Warehouse Occupational Environmental Management Plan (WOEMP) is required by CoC C6 which also specifies required content (with reference to CoC C3 and C7). Warehouse 5 (WH5) is to be occupied under lease by Qube Logistics SB NSW Pty Ltd (Qube).

This document is the WOEMP for WH5 which has been prepared to address the requirements of CoC C6 and C7 and the *Guideline for the Preparation of Environmental Management Plans* (DIPNR, 2004).

1.2 Purpose and Objectives of this WOEMP

All activities within the Moorebank Logistics Park (MLP) must be undertaken in accordance with the overarching Moorebank Logistics Park – East Precinct Operational Environmental Management Plan (OEMP), prepared and implemented by Qube Holdings, and the relevant CoC.

The primary purpose of this management plan is to address the requirements of SSD 7628 CoC C6 which requires that *'prior to occupation of individual warehouses, a Warehouse OEMP must be submitted to the Secretary of Department of Planning and Environment (DP&E) for approval and must:*

- a) be generally in accordance with the precinct OEMP required under condition C3*
- b) demonstrate compliance with condition B114 regarding maintenance of quantities of dangerous goods below the screening threshold and*
- c) include auditing requirements'.*

This WOEMP addresses CoC C6, the content requirements of management plans identified in CoC C7 and aligns warehouse operations with the overarching OEMP.

The objectives of this WOEMP are to:

- Demonstrate and facilitate compliance with CoC C3, C6 and C7
- Identify the CoC relevant to warehouse operations
- Identify the management measures to manage impacts on the environment in accordance with the CoC and statutory obligations
- Identify environmental roles and responsibilities
- Provide a consistent and uniform approach to site environmental management which enables environmental protection to be maintained

- Provide operational personnel, including contractors and visitors, with sufficient information to undertake their activities in accordance with this WOEMP and
- Provide content to inform training.

2 OPERATIONS

2.1 Operator Details

Table 2-1 Operator details

Detail	Comment
Name	Qube Logistics SB NSW Pty Ltd (Qube)
Address	Warehouse 5, 400 Moorebank Avenue, Moorebank, NSW 2170
Contact person	Warehouse Commercial Manager - Amber Muscat
Email address	amber.muscat@qube.com.au

2.2 Site Description

The site is located at WH5 of the Moorebank Logistics Park East Precinct on Moorebank Avenue. A plan showing the extent of the site and surrounding areas is provided in **Figure 2-1**.

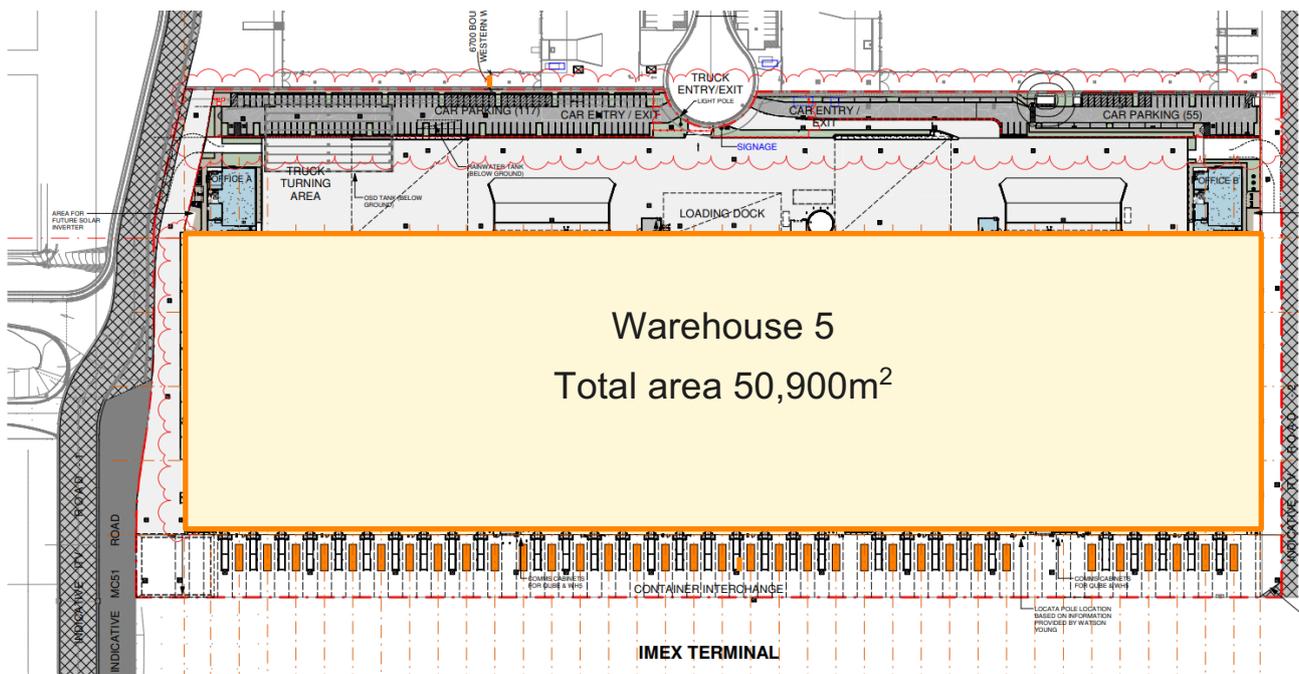


Figure 2-1 WH5 site layout within the WH5 lease area

2.3 Description of Operations

The organisation operates warehouse and distribution activities from WH5. Day to day activities include:

- Receipt and despatch of goods from and to the IMEX terminal
- Packing and unpacking of containers
- Storage of goods
- Truck movements in and out of WH5 and
- General office administrative and support functions.

Qube's warehouse and distribution activities operate 24 hours, 7 days per week and employs approximately 200 people on a shift basis.

Typical plant and equipment used in the operation varies between the internal and external warehouse environment and may include:

Internal Warehouse Environment:

- Electric high reach forklifts
- Pallet racking and
- Pallet runners.

External Warehouse Environment:

- PBS 2 vehicles accessing facility
- Combi-lift / auto straddlers delivering to the warehouse
- Waste removal trucks and
- Support and service vehicles e.g. road sweeper.

2.4 Safety, Health and Sustainability Policy

Our organisation is committed to constantly challenging its Safety, Health and Sustainability performance which is available at <https://qube.com.au/about/safety-health-sustainability/>. The policy is subject to review and revision in accordance with Qube management system.

Qube is focused on four key pillars in our sustainability strategy:

- People and Culture which emphasises the importance of aligning our people and culture with business needs and values as well as consistent standards
- Community and Partners to ensure that we align and connect at our local operations level, our suppliers and contractors
- Governance which establishes synergies, systems and frameworks throughout our organisation with common goals and
- Environment which guides our way on minimising our organisation's footprint.

Our Safety, Health and Sustainability Policy is provided to our Contractors and Partners to ensure consistent alignment within all organisations in the supply chain.

3 ENVIRONMENTAL MANAGEMENT

3.1 Environmental Structure and Responsibility

Condition C5 identifies that the entity responsible for the Precinct has overall responsibility for the development environmental management.

Responsibility for Precinct environmental management sits with the Project Delivery Company (PDC), established under arrangement with the Commonwealth Government. PDC is the entity responsible for delivering the development and is also tasked with the ongoing maintenance and environmental performance and reporting of the Precinct once it has been developed.

3.2 Delivery and Maintenance Responsibility

Qube Holdings, in its capacity as PDC and Estate Management Company (EMC), is the entity responsible for the delivery and ongoing maintenance for the common assets within the intermodal estate comprising (refer to Section 2 in Qube's Precinct OEMP):

- site services
- landscaping, including weed management
- OSD and Water Sensitive Urban Design elements, including recycling
- noise
- ESD
- internal roads
- water quality and quantity
- emergency services, including bushfire mitigation and fire hydrants
- air quality
- fencing
- pedestrian paths
- lighting of common areas
- light spill from common areas and individual tenancies
- site visual impact
- common signage

This responsibility extends to obligations for fulfilling the delivery and development, construction and operations environmental management and reporting obligations under MPE Stage 2 SSD 7628 CoC. The responsibility is initially documented in the Precinct OEMP, as required by CoC C3(e).

Warehouse tenants have responsibility for general building/ premises upkeep and maintenance, including any open space or ancillary warehouse use, integrated building signage and lighting and waste management.

Qube Holdings has the additional responsibility of demonstrating tenancies do not exceed any hazardous materials screening thresholds in accordance with the Hazardous and Offensive Development Application Guidelines Applying SEPP 33 (Department of Planning, January 2011) as specified in CoC B114 and C6(b) for this WOEMP. This responsibility is considered further in Section 4.4 of this WOEMP.

Qube Holdings has broad responsibility for site environmental management of operations and will work with Qube Logistics to support the achievement of the site environmental management objectives. This responsibility includes review of WH5 activities that have an interface with the common site environment and management controls, such as stormwater and drainage controls, and facilitating access to performance monitoring and reporting data that supports site-wide reporting obligations under the Precinct OEMP and CoC, including management of noise and air emissions.

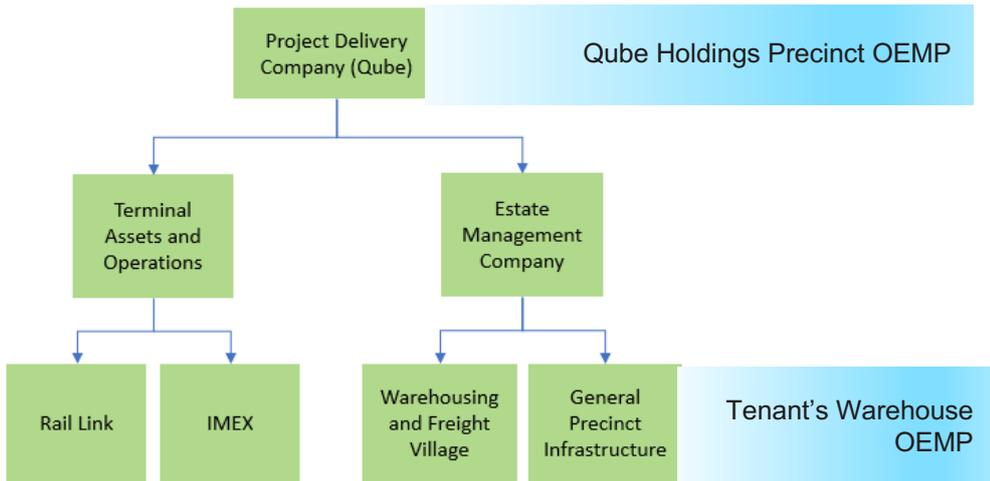


Figure 3-1 Precinct management structure

Qube's Precinct OEMP identifies the operational environmental management measures that will be implemented across the site for all site functions. Figure 3-1 shows the relationship between Qube Holdings, in its role as PDC and EMC, and warehouse tenants. The WOEMP is identified as an environmental management plan operating beneath the Precinct OEMP and focussed on the warehouse operation.

The relationship between Qube Precinct OEMP, required under CoC C3, and this WOEMP, required under CoC C6, is demonstrated in Figure 3-2 below.

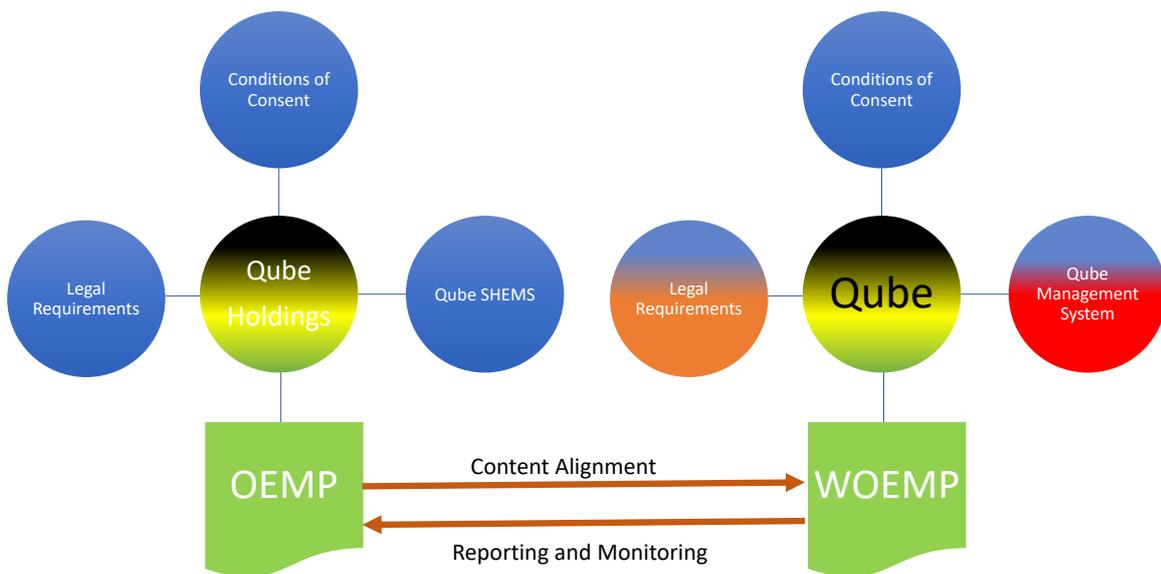


Figure 3-2 Relationship between Qube's Precinct OEMP, required under CoC C3, and this WOEMP

3.3 Environmental Management Overview

Figure 3-2 above demonstrates that this WOEMP is:

- Aligned to the SSD 7628 CoC and
- Influenced by the organisation's legal requirements and other requirements regarding internal or external Safety, Health and Environmental Management System (SHEMS).

The WOEMP identifies a reporting and monitoring output to the OEMP to enable Qube Holdings/EMC to fulfil its monitoring, reporting and publication requirements under the CoC.

3.4 Development Approvals

The organisation's operations at WH5 are undertaken in accordance with SSD 7628 CoC. Table 3-1 below summarises the conditions pertaining to warehouse operations and where they are addressed in this document.

Table 3-1 Applicable CoC to WH5 operations

CoC SSD 7628	Requirement	Document Reference
General		
A2 – A4	Terms of consent defining operation of development	Note
A12	Use of warehousing and distribution facilities	Note
A32	Plant and equipment maintained and operated in a proper and efficient condition and manner	Table 4-1
C6	Preparation of WOEMP	This plan
C7	Form and content requirements of management plans.	Note
Operational Traffic		
B26 – B27	Operate in accordance with the Operational Traffic and Access Management Plan	Table 4-1
Air Quality		
B59	Operate in accordance with the Operational AQMP	Table 4-1
B60	Operation to not cause or permit emission of any offensive odour	Table 4-1
B61	Installation and operation of plant and equipment to comply with limits, air quality criteria and air monitoring requirements	Table 4-1
Operational Noise		
B79	Operation is permitted 24 hours 7 days per week	Section 2
B83	Operate in accordance with the Operational Noise Management Plan	Table 4-1
B84	Noise assessment for mechanical plant required prior to construction – to be considered on any change or upgrade to plant and equipment.	Table 4-1 and Table 5-1
B85	Noise monitoring of mechanical plant and other noisy equipment following occupation of each warehouse. Preparation of a Monitoring Report for Mechanical Plant within two months of occupation to verify predicted mechanical plant and equipment noise levels.	Table 5-1
B89	Heavy vehicles not permitted to use Moorebank Avenue south of the East Hills Railway corridor	Table 4-1
Dangerous Goods		
B112	Storage and handling of all chemicals, fuels and oils, including Dangerous Goods as defined in the Australian Code for the Transport of Dangerous Goods by Road & Rail.	Table 5-1
B113	Compliance with the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management — technical bulletin (EPA, 1997)</i> and that for liquids,	Table 5-1

CoC SSD 7628	Requirement	Document Reference
	a minimum bund volume of 110% of the volume of the largest single stored volume within the bund is required.	
B114	The quantities of dangerous goods present at any time within each premises or transported from and to the development must be kept below the screening threshold quantities listed in the Department's <i>Hazardous and Offensive Development Guidelines Application Guidelines Applying SEPP 33</i> (January 2011)	Section 4.3
B115	Dangerous Goods compliance report required prior to occupation.	Table 5-1
B116	Emergency Response Plan	Section 3.7
Waste Management		
B121	Waste to be secured and maintained within designated storage areas	Table 4-1
B122	Lawful disposal of wastes	Table 4-1
B123	Assessment and classification of wastes prior to removal from site	Table 4-1
B124	No receipt of wastes generated from off-site	Table 4-1
B125	Retention of waste sampling and classification data	Table 4-1
B126	Collection of wastes between 7 am and 10 pm Monday to Friday	Table 4-1
Pests, Vermin and Noxious Weed Management		
B127	Inspection of site and management of pests, vermin and noxious weeds	Table 4-1
Ecologically Sustainable Development		
B142	Warehouse to be designed and operated to meet ESD principles	Table 4-1
Incident Management		
C11 – C12	Notification of incidents	Section 3.7
C13	Preparation of incident reports	Section 3.7
C14	Compliance with directions to address the cause or impact of an incident	Section 3.7
C15	EPA notification to be provided to the Secretary.	Section 3.7
Non-compliance Notification and Reporting		
C16	Non-compliance notification to the Department (DPIE)	Section 5.3
C17	Content expectations for non-compliance notification	Section 5.3
Compliance Monitoring and Tracking		
C21	Compliance monitoring and reporting aligned to the Compliance Reporting Post Approval Requirements (DP&E, June 2018)	Table 5-1

3.5 Roles and Responsibilities

Key roles and responsibilities associated with the organisation's operations at WH5 are presented in Table 3-2.

Table 3-2 Roles and responsibilities

Role	Responsibilities
Warehouse Manager	<ul style="list-style-type: none"> Approve the WOEMP and any subsequent revisions Oversee and verify the implementation of this WOEMP

Role	Responsibilities
	<ul style="list-style-type: none"> • Manage complaints • Facilitate the provision of environmental induction and training to all warehouse personnel • Maintain plant and equipment in an efficient and effective operating condition • Conduct monthly environmental inspections • Maintain appropriate records of training, maintenance, monitoring, complaints, incidents, inspections, investigations, audits and reporting relevant to warehouse operations • Act as the primary contact in relation to environmental performance of the warehouse • Promptly notify Qube Estate Management of an environmental spill or pollution incident • Communicate outcomes of monitoring, reporting, incidents, inspections, investigations and audits provided by Qube Estate Management and/or prepared under the WOEMP •
All Personnel Including Subcontractors and Visitors	<ul style="list-style-type: none"> • Adhere to the directives of this WOEMP • Act in an environmentally responsible manner • Report all environmental incidents as soon as practicable • Participate in subsequent investigations and implementation or preventive action(s) as required • Attend all required environmental awareness, induction and training sessions

3.6 Training

3.6.1 Site Induction

All personnel (site staff and contractors) seeking to perform works on site will first complete a site induction managed through Rapid Induct Induction training which includes the following components:

- The organisation’s commitment to the Safety, Health and Sustainability Policy
- Environmental awareness
- Overview of the Precinct OEMP
- Overview of this WOEMP
- Identification of key environmental aspects and management measures
- Individual responsibilities and obligations
- Community expectations and liaison protocols
- Emergency response and incident notification i.e. use of spill kits
- Complaints management procedures
- Woolworths customer-specific warehouse HACCP training
- Spill response and
- Woolworths Quality Assurance.

Records of completion of induction training will be maintained in Rapid Induct.

3.6.2 Dangerous Goods Training

Training provided in respect of the management of Dangerous Goods (DG) and screening thresholds will vary depending on an employees' roles and responsibilities. Training will include at least components of the following:

- An awareness or understanding of the dangerous goods classification system
- Awareness of safe work practices relating to the storage and handling of dangerous goods at the premises
- How to interpret information provided on labels, signs and placards
- How to locate a Safety Data Sheet (SDS), how to use this information and where to obtain any other relevant information in ChemAlert
- How to locate DG register in ChemAlert
- The nature of the hazards and risks associated with the duties being performed
- Measures used to control the risks and how to apply these
- Proper use, cleaning and replacement of PPE and spill control equipment
- Emergency procedures and
- First aid and incident reporting procedures to be followed in the case of illness, injury, incident or serious incident.

Records of participation and delivery of dangerous goods training will be retained onsite.

3.7 Environmental Incidents and Emergencies

The *Protection of the Environment Operations Act 1997* (POEO Act) defines an environmental pollution incident as 'a set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise'.

Environmental incidents and emergencies that are considered in the WH5 Emergency Management Plan include:

- Fire, flood, and explosion
- Failure of plant and equipment and
- Spills and leaks.

3.7.1 Incident Management

In accordance with the POEO Act, an incident causing or threatening to cause material harm to the environment is to be reported immediately.

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

The following procedure will be followed when an environmental incident causing or threatening to cause material harm to the environment occurs:

- Any personnel identifying a pollution incident will verbally report it to the Warehouse Manager immediately
- The Warehouse Manager will then verbally notify Qube Estate Management
- Depending on the severity of the pollution incident, the Warehouse Manager will arrange notification and all subsequent communication of the incident to Qube Estate Management who will notify the environmental regulatory authorities as required with reference to requirements under CoC C11 – C17

- An incident register of all environmental incidents, accidents or potential incidents will be maintained by Qube Estate Management
- An appropriate level of investigation is to be undertaken for all environmental incidents relating to the operation of the warehouse
- The investigation will be undertaken in a timely manner (with reference to notification and reporting obligations under CoC C11 – C17) and a copy provided to Qube Estate Management on completion and
- The Warehouse Manager will confirm any follow up actions from these incidents is recorded and status tracked to completion with confirmation of closeout.

An emergency contact list of all the 24-hour emergency services and site personnel that are responsible for dealing with incidents or emergencies relevant to operations is available in strategic locations around site – with a hard copy located in the main office.

3.7.2 Emergency Contact Details

Table 3-3 Emergency contact details

Contact Name	Telephone Number	Address
Ambulance	000	N/A
Fire Brigade	000	N/A
Police	000	N/A
OEH Pollution Hotline	131 555	N/A
Ministry of Health	(02) 9391 9000	N/A
SafeWork NSW	13 10 50	N/A
Liverpool City Council	Customer Contact Centre for NSW residents: 1300 36 2170 Calling from interstate: (02) 9821 9222 National Relay Service (NRS) for hearing and speech impaired customers: 133 677	Ground Floor, 33 Moore St, Liverpool NSW 2170
Rural Fire Service	(02) 9603 7077	Corner Alderney St and Townson Ave, Minto 2566
Liverpool Hospital	(02) 8738 3000	Corner of Elizabeth and Goulburn Streets, Liverpool, NSW 2170
Qube Hotline Number	1800 986 465	N/A
Commercial Manager	0411 109 749	WH5, 400 Moorebank Avenue, Moorebank, NSW 2170

4 IMPLEMENTATION – ENVIRONMENTAL MANAGEMENT

4.1 Risk Management

Warehouse operations will have an internal and external interface with Precinct environmental aspects. Management of all aspects is covered under the suite of environmental management sub-plans that form part of the overarching Qube Precinct OEMP. Qube Holdings/EMC works with Qube Logistics to review and manage environmental performance for WH5.

Qube Holdings Precinct OEMP identified the following key environmental components for WH5 operations:

- Soil and water and
- Noise and vibration.

These two environmental components represent the highest probability of being recipient to a pollutant generated on the WH5 site with capability of migrating from the WH5 site to the MPE site and beyond the MPE precinct boundary.

Environmental management measures that are relevant to the WH5 site for the range of environmental aspects covered by the MPE Stage 2 SSD 7628 CoC and Qube's Precinct OEMP (refer to Appendix E Aspects and Impacts Register) are identified in the following section.

4.2 Management Measures

This section describes the overall approach to managing and mitigating environmental risks at WH5 that are aligned to the operations requirements and expectations of the CoC and Qube's Precinct OEMP. Appendix E of Qube's Precinct OEMP identifies the assessed risk ratings relevant to warehousing and these risk ratings and their respective nominated control measures have been applied to the WH5 as per Table 4-1 below. Where the management measures in Table 4-1 identify a requirement to monitor and/or record, this data and information will be acquired by EMC to enable precinct-wide reporting in accordance with the respective CoC.

Table 4-1 Management measures

Aspect	Limits/ Performance Measures/ Criteria	Performance Indicators	Management Measure	Responsibility
Air quality	Management of air pollutant emissions sources No odours emitted from WH5	Plant and equipment maintenance and monitoring records # of air pollutant incidents/complaints/ - notices # of odour complaints for WH5 Record of responses and corrective actions to incidents/ complaints	<ul style="list-style-type: none"> Identify and quantify sources of air pollutant complaints. Trucks and plant used on-site will be maintained. Unnecessary idling of trucks and plant will be avoided. Management of domestic/putrescible waste receptacles. Record and respond to any odour complaints. Operate in accordance with the Air Quality Management Plan Maintenance (road sweepers, etc) (refer to Qube Precinct OEMP). 	Qube Logistics / EMC in consultation with Warehouse Manager
Transport and Traffic	Level of service maintained on adjacent intersections No queuing	# truck movements Frequency of truck movements Record of class/sizes of trucks accessing WH5 # of incidents	<ul style="list-style-type: none"> Record trip origin and destination information. Issue a driver's code of conduct referencing the Operational Traffic and Access Management Plan (OTAMP). Heavy vehicles not permitted to use Moorebank Avenue south of the East Hills Railway corridor. 	Qube Logistics / EMC
Biodiversity and Ecology	No collision with or creation of hazard for fauna	# fauna collision incidents	<ul style="list-style-type: none"> Fencing around site. Operate within speed limit around site. 	All personnel, contractors and visitors
Contamination	Below screening thresholds in SEPP 33 guidelines Identification of any material incompatibility	Refer Section 4.3	<ul style="list-style-type: none"> Record and review the storage and road movements of hazardous material to and from the warehouse and the typical quantity in each load. Records must be inclusive of industrial equipment containing quantities of dangerous goods. Induction, awareness and vocational training relating to the presence, storage and handling of hazardous materials or dangerous goods to be provided as appropriate and relevant. 	Qube Logistics / EMC in consultation with Warehouse Manager

Aspect	Limits/ Performance Measures/ Criteria	Performance Indicators	Management Measure	Responsibility
Soil and Water	Prevention of spills and gross pollutants from entering the site drainage system	<p># of spills</p> <p>Volume of gross pollutants recovered</p> <p># of incidents/- complaints/- investigations</p> <p>Record of responses and corrective actions to incidents/ complaints</p>	<ul style="list-style-type: none"> Promptly report spills via internal processes Spills are to be managed in accordance with the Emergency Spill Response Procedure included within the Site Emergency Response Plan (refer to Qube Precinct OEMP) and the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin</i> (EPA, 1997). Spill kits to be maintained onsite in accessible locations. Spill kits to be used in the event of inadvertent spills of fuels, oils, hydraulic fluids or other hazardous wastes, to contain the spill and avoid contamination of waterways/ soil. Personnel to be trained in the use of spill kits. 	<p>All personnel, contractors and visitors</p> <p>Warehouse Manager</p>
Noise and Vibration	<p>Day, evening and night L_{Aeq15} levels < 35 dB</p> <p>Night L_{A1} <52 dB</p>	<p>Review sound power levels of selected plant and equipment</p> <p># of incidents/- complaints/- investigations</p> <p>Record of responses and corrective actions to incidents/ complaints</p>	<ul style="list-style-type: none"> Periodically review specifications of new or altered plant and equipment to identify and record sound power levels and vibration emission levels in performance specifications Where there are complaints about noise from an identified work activity, review and implement feasible and reasonable actions or mitigations additional to those described above to minimise noise output. 	<p>Qube Logistics / EMC in consultation with Warehouse Manager</p>
Management and Storage of Liquid Chemicals	<p>All liquid chemicals, fuels and oils stored and managed in accordance with the Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin (EPA, 1997 and the NSW EPA's Storing and Handling of Liquids: Environmental Protection – Participants Handbook.</p> <p>Storage of flammable/combustible liquids in accordance with Australian Standard AS 1940: The Storage and Handling of Flammable and Combustible Liquids.</p>	<p># spills</p> <p># liquid containers with 110% capacity bunding in place</p>	<ul style="list-style-type: none"> Store and handle all liquid chemicals, fuels and oils in accordance with the NSW EPA's Storing and Handling of liquids: Environmental protection – Participants handbook. Store all flammable/combustible liquids in accordance with Australian Standard AS 1940: The Storage and Handling of Flammable and Combustible Liquids. Liquid chemicals, fuels and oils to be stored within designated storage areas only. Minimum bund volume of 110% of the volume of the largest single stored liquid to be maintained at all times. Spills are to be managed in accordance with the Emergency Spill Response Procedure included within the Site 	<p>All personnel, contractors and visitors</p> <p>Warehouse Manager</p>

Aspect	Limits/ Performance Measures/ Criteria	Performance Indicators	Management Measure	Responsibility
			<p>Emergency Response Plan (refer to Qube Precinct OEMP) and the <i>Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin</i> (EPA, 1997).</p> <ul style="list-style-type: none"> Emergency spill kits to be available in accessible locations and regularly maintained. Personnel to be trained in the correct use of spill kits. 	
Bushfire and Emergency Management Risk	Provision of awareness and emergency response training	<p># of bushfire risk alerts for Total Fire Ban days</p> <p># of evacuation drills per year</p>	<ul style="list-style-type: none"> Bushfire awareness and requirements of bushfire safety will be included in inductions and in toolbox talks pre-commencement. Review and communication of elevated bushfire risk, particularly during the declared bushfire period. Personnel are aware of the sheltering and evacuation procedures. Conduct practice fire sheltering and evacuation drills. The emergency assembly point and evacuation routes will be clearly signposted and communicated. Assembly points are maintained and visibly signed. Warehouse / tenant must have a representative on the Emergency Planning Committee. Firefighting equipment (hoses etc.) is serviceable and available. 	Qube Logistics / EMC
Utility Infrastructure	Provision of awareness and emergency response training	# Malfunctions or damage of electrical, sewer or water infrastructure	<ul style="list-style-type: none"> Induction training relating to the presence and location of electrical, sewer and water infrastructure. Implement Emergency Response Plan (refer Qube Precinct OEMP). Assembly points are maintained and visibly signed. Firefighting equipment (hoses etc.) is serviceable and available. 	EMC and Warehouse Manager
Pests, Vermin and Noxious Weeds	<p>Pest control</p> <p>Elimination of any noxious weeds</p>	# of complaints	<ul style="list-style-type: none"> Operate in accordance with the Weed Management Plan (refer to Qube Precinct OEMP). 	Qube Logistics / EMC and

Aspect	Limits/ Performance Measures/ Criteria	Performance Indicators	Management Measure	Responsibility
		Record of pest and noxious weed control activities	<ul style="list-style-type: none"> Control of pests, vermin and noxious weeds around the warehouse premises. Pest and weed control activities. Application of any pesticides or herbicides on the premises in accordance with the <i>Pesticides Act 1999</i>. 	Warehouse Manager
Ecologically Sustainable Development	Premises operated to meet ESD principles	# and type of ESD initiatives developed and implemented on the premises.	<ul style="list-style-type: none"> Recording of ESD initiatives and outcomes. 	Qube Logistics / EMC
Incident Management Notification and Reporting	Incident notification, investigation and reporting in accordance with CoC requirements	# of incidents timeliness of notifications and investigations	<ul style="list-style-type: none"> Recording and tracking of all incidents, investigations and complaints including verification of completion of closeout actions. 	Qube Logistics / EMC and Warehouse Manager
Complaints	Record and respond to all complaints	# of complaints received # of complaints verified as closed out # of unresolved complaints	<ul style="list-style-type: none"> Maintain a complaint register that records: <ul style="list-style-type: none"> complaint date and time and complainant details the detail of each complaint immediate actions taken, including notifications recommended corrective and/or preventive action to be taken following investigation of the complaint actions reviewed justification for not implementing any actions agreed actions tracked to completion verification of closeout of the complaint with the complainant, where applicable 	Qube Logistics / EMC

4.3 Compliance with B114 Dangerous Goods Thresholds

Condition C6 requires specific demonstration of compliance with CoC B114 in the WOEMP. CoC B114 states:

The quantities of Dangerous Goods present at any time within each premises or transported from and to the development must be kept below the screening threshold quantities listed in the Department's Hazardous and Offensive Development Guidelines Application Guidelines Applying SEPP 33 (January 2011)

Compliance with condition B114 will be achieved by enabling Qube Holdings / EMC to review data and information relating to dangerous goods movements and storage and quantities recorded.

The organisation DO NOT store or transport in any quantity Dangerous Goods (DGs). If DGs are identified as defined in Section 3.4 of this plan, the organisation will follow the processes outlines in the DGs Procedure. This procedure specifies the processes for identifying, receiving, handling, managing, storing and transporting, and recording and tracking DG's and hazardous substances.

4.4 Identification of Dangerous Goods

Dangerous goods are substances or articles that pose a risk to people, property or the environment, due to their chemical or physical properties. They are usually classified with reference to their immediate risk.

This is different from the definition of a hazardous substance which is defined in terms of the chronic or acute harm caused to the health of people exposed to the substance. For the purposes of the WOEMP, the definition of hazardous substances is referenced to the *Hazardous and Offensive Development Application Guidelines, Applying SEPP 33* (Department of Planning, NSW, 2011) as substances falling within the classification of the *Australian Code for Transportation of Dangerous Goods by Road and Rail* (Australian Dangerous Goods Code, National Transport Commission, Edition 7.7 2020) (ADG). An electronic version of the ADG Code is provided here: ntc.gov.au.

The classes of dangerous goods are identified in Table 4-2, below. It should be noted that the ADG does not cover transport of explosives (Class 1) or radioactive substances (Class 7) or usage, storage or security of dangerous goods.

Wastes must be transported under the requirements of the appropriate class considering their hazards and the criteria in the ADG. Wastes not otherwise subject to this Code but covered under the Basel Convention on the *Control of Transboundary Movements of Hazardous Wastes and their Disposal* (1989), may be transported under Class 9.

Table 4-2 Classes of dangerous goods

Class	Description	Example
1	Explosives	Fireworks, ammunition, gelignite
2.1	Flammable gases	Acetylene, hydrogen LPG
2.2	Non-flammable, non-toxic gases	Nitrogen, carbon dioxide, refrigerant gases
2.3	Toxic gases	Chlorine (gas), ammonia
3	Flammable liquids	Ethanol, methanol, hexane
4.1	Flammable Solids, self-reactive substances solid desensitized explosives and polymerizing substances	Sulphur
4.2	Substances liable to spontaneous combustible	White phosphorous, activated carbon
4.3	Substances which in contact with water emit flammable gases	Sodium metal, calcium carbide
5.1	Oxidizing substances	Sodium peroxide, calcium hypochlorite (pool chlorine)
5.2	Organic peroxides	Methyl ethyl ketone peroxide

Class	Description	Example
6.1	Toxic substances	Sodium cyanide
6.2	Infectious substances	Clinical or medical waste
7	Radioactive substances	Tritium
8	Corrosives substances	Hydrochloric acid, sodium hydroxide
9	Miscellaneous dangerous substances and articles, including environmentally hazardous substances	Asbestos, dry ice

In Australia, dangerous goods are defined by the Australian Dangerous Goods Code (ADG). Classifications in the SEPP 33 Guidelines are based on the 7th Edition of the ADG.

Packing groups are used to indicate the degree of danger associated with the transport of dangerous goods of a given class:

- Packing group I - Substances presenting high danger
- Packing group II - Substances presenting medium danger and
- Packing group III - Substances presenting low danger.

It should be noted that packing groups are not assigned to classes 1, 2 and 7 or to Divisions 5.2, 6.2 or self-reactive substances of Division 4.1

C1 combustible liquids are not a dangerous good under United Nations classification. They are defined as dangerous goods under workplace legislation. This also applies to goods too dangerous to be transported.

Where dangerous goods are used or stored in volumes greater than the threshold quantities detailed in Table 4-3 below, Safework NSW must be notified and manifests and emergency plans must be developed.

Table 4-3 shows the thresholds applying at the time of writing referencing *Managing Risks of Hazardous Chemicals in the workplace* (SafeWork NSW, August 2019).

Table 4-3 SafeWork NSW Placard and Manifest Quantities information for Dangerous Goods (Refer to NSW WHS Regs 2011, Schedule 11)

Item	Description of hazardous chemical		Equivalent dangerous goods class/ division/packing group (Note 1)	Placard quantity	Placard to display (Note 2)	Manifest quantity
	GHS hazard class	GHS hazard type/category				
1	Flammable gases	Category 1	2.1 (except aerosols)	200 L		5,000 L
2	Gases under pressure	with acute toxicity, categories 1, 2, 3 or 4 Note – Category 4 only up to LC50 of 5,000 ppmV	2.3	50 L		500 L
3		with skin corrosion categories 1A, 1B or 1C	2.3/8	50 L		500 L
4		Aerosols	2.1 or 2.2	5,000 L	 If any 2.1 present, else 2.2 (green class label) shown on the next page	10,000 L

Item	Description of hazardous chemical		Equivalent dangerous goods class/ division/packing group (Note 1)	Placard quantity	Placard to display (Note 2)	Manifest quantity	
	GHS hazard class	GHS hazard type/category					
5		Not specified elsewhere in this table	2.2 (except aerosols) or 2.2/5.1 (oxidizing gas)	1,000 L	 or 	10,000 L	
6	Flammable liquids	Category 1	3 PG I	50 L		500 L	
7		Category 2	3 PG II	250 L		2,500 L	
8		Category 3	3 PG III	1,000 L		10,000 L	
9		Any mix of chemicals from items 6–8 where none of the items exceeds the quantity for placards or manifests on their own	3	1,000 L		10,000 L	
10		Category 4	Combustible Liquids (flash point <93°C)	10,000 L (Note 3)			100,000 L (Note 3)
11	Self-reactive substances	Type A	Goods Too Dangerous To Be Transported (GTDTBT)	5 kg or 5 L		50 kg or L	
12		Type B	4.1	50 kg or L			500 kg or L
13		Type C – F	4.1	250 kg or L			2,500 kg or L
14	Flammable solids	Category 1	4.1 PG II	250 kg		2,500 kg	
15		Category 2	4.1 PG III	1,000 kg		10,000 kg	
16		Any mix of chemicals from items 12–15 where none of the items exceeds the quantity for placards or manifests on their own	4.1	1,000 kg or L		10,000 kg or L	

Item	Description of hazardous chemical		Equivalent dangerous goods class/ division/packing group (Note 1)	Placard quantity	Placard to display (Note 2)	Manifest quantity
	GHS hazard class	GHS hazard type/category				
17	Pyrophoric liquids and pyrophoric solids	Category 1	4.2 PG I	50 kg or L		500 kg or L
18		Category 1	4.2 PG II	250 kg or L		2,500 kg or L
19		Category 2	4.2 PG III	1,000 kg or L		10,000 kg or L
20		Any mix of chemicals from items 17–19 where none of the items exceeds the quantity for placards or manifests on their own	4.2	1,000 kg or L		10,000 kg or L
21	Substances which in contact with water emit flammable gas	Category 1	4.3 PG I	50 kg or L		500 kg or L
22		Category 2	4.3 PG II	250 kg or L		2,500 kg or L
23		Category 3	4.3 PG III	1,000 kg or L		10,000 kg or L
24		Any mix of chemicals from items 21–23 where none of the items exceeds the quantity for placards or manifests on their own	4.3	1,000 kg or L		10,000 kg or L
25	Oxidising liquids and Oxidising solids	Category 1	5.1 PG I	50 kg or L		500 kg or L
26		Category 2	5.1 PG II	250 kg or L		2,500 kg or L
27		Category 3	5.1 PG III	1,000 kg or L		10,000 kg or L

Item	Description of hazardous chemical		Equivalent dangerous goods class/ division/packing group (Note 1)	Placard quantity	Placard to display (Note 2)	Manifest quantity
	GHS hazard class	GHS hazard type/category				
28		Any mix of chemicals from items 25–27 where none of the items exceeds the quantity for placards or manifests on their own	5.1	1,000 kg or L		10,000 kg or L
29	Organic peroxides	Type A	GTDTBT	5 kg or L		50 kg or L
30		Type B	5.2	5 0 kg or L		500 kg or L
31		Type C–F	5.2	250 kg or L		
32		Any mix of chemicals from items 30–31 where none of the items exceeds the quantity for placards or manifests on their own	5.2	250 kg or L		
33	Acute Toxicity	Category 1	6.1 PG I	50 kg or L		500 kg or L
34		Category 2	6.1 PG II	250 kg or L		
35		Category 3	6.1 PG III	1,000 kg or L		
36	Any mix of chemicals from items 33–35 where none of the items exceeds the quantity for placards or manifests on their own	6.1	1,000 kg or L	10,000 kg or L		

Item	Description of hazardous chemical		Equivalent dangerous goods class/ division/packing group (Note 1)	Placard quantity	Placard to display (Note 2)	Manifest quantity
	GHS hazard class	GHS hazard type/category				
37	Skin corrosion	Category 1A	8 PG I	50 kg or L		500 kg or L
38		Category 1B	8 PG II	250 kg or L		2,500 kg or L
39		Category 1C	8 PG III	1,000 kg or L		10,000 kg or L
40	Corrosive to metals	Category 1	8 PG III	1,000 kg or L		10,000 kg or L
41		Any mix of chemicals from items 37– 40 where none of the items exceeds the quantity for placards or manifests on their own	8	1,000 kg or L		10,000 kg or L
42	Unstable explosives		GTDTBT	5 kg or 5 L		50 kg or L
43		Any mix of chemicals from items 11, 29 and 42 where none of the items exceeds the quantity for placards or manifests on their own	GTDTBT	5 kg or 5 L		50 kg or L

Under the POEO Act, an environment protection licence (EPL) is required where scheduled activities are undertaken on our premises. Scheduled activities are defined in Schedule 1 of the POEO Act and include Chemical Storage.

Chemical storage has three categories identified under Schedule 1 as follows:

- **"general chemicals storage"** meaning the storage or packaging in containers, bulk storage facilities or stockpiles of any chemical substance classified as a dangerous good in the *Transport of Dangerous Goods Code*, other than the following:
 - (a) petroleum or petroleum products
 - (b) radioactive substances within the meaning of the *Radiation Control Act 1990*.
- **"onsite generated chemical waste storage"** means the storage of any chemical substance produced on site that is prescribed waste (that is, hazardous waste, restricted solid waste or liquid waste, or any combination of them).
- **"petroleum products storage"** meaning the storage or packaging of petroleum or petroleum products in containers, bulk storage facilities or stockpiles.

Each activity referred to in Column 1 of Table 4-4 is declared to be a scheduled activity if it meets the criteria set out in Column 2 of Table 4-4.

Table 4-4 Chemical storage POEO Act scheduled activity criteria

Column 1	Column 2
Activity	Criteria
General chemicals storage	Capacity to store more than 20 tonnes (pressurised gases), 200 tonnes (liquefied gases) or 2,000 tonnes (chemicals in any other form)
Onsite generated chemical waste storage	Involves storing on site at any time more than 5 tonnes of any chemical substance produced on site that is prescribed waste, not including excluded material (where 1,000 litres of liquid are taken to weigh 1 tonne)
Petroleum products storage	Capacity to store more than 200 tonnes (liquefied gases) or 2,000 tonnes (chemicals in any other form)

Both SafeWork NSW and POEO Act obligations for notifying dangerous goods quantities and potential requirement for an environment protection licence will be in addition to monitoring of screening thresholds under SEPP 33.

An environment protection licence is not required for chemical storage at the WH5 because the HACCP system limits storage of DGs on-site. All chemicals and their Safety Data Sheet (SDS) are managed through ChemAlert. Should on-site storage of materials be projected to exceed the criteria under Schedule 1 of the POEO Act, a licence would be obtained, prior to any exceedance occurring.

4.4.1 Screening Thresholds of Dangerous Goods

Screening thresholds for the purposes of the WOEMP requirements are identified in *Hazardous and Offensive Development Application Guidelines, Applying SEPP 33* (Department Of Planning, NSW, 2011). Specifically, Section 7 and Table 1 of the SEPP 33 Guidelines identifies the screening method to be used based on the dangerous goods class and screening thresholds are presented in Table 3 and referenced graphs of the SEPP 33 Guidelines (reproduced in Appendix F of this WOEMP).

Where the minimum quantity exceeds a nominated threshold in Table 1, reference is made to a particular graph rather than to Table 3 to identify the relevant screening threshold quantities.

Note: Classes 1.4, 1.5, 1.6, 2.2, 7 and 9 are excluded from the risk screening in the SEPP 33 Guidelines.

4.4.2 Identification of Quantities of Dangerous Goods

The organisation will monitor the quantities of dangerous goods being transported, stored and handled in WH 5.

A review of dangerous goods quantities shall be undertaken in order to affirm that quantities of dangerous goods remain below the screening thresholds of the SEPP 33 Guidelines. Such data will be used to support the organisation's six-monthly compliance reporting requirements.

If monitoring results in a screening threshold being exceeded, the warehouse operation would be considered potentially hazardous and SEPP 33 would apply. This would potentially require a modification to condition B114 of the existing consent supported by a preliminary hazard analysis (PHA). The PHA would need to be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 — Hazard Analysis. An outline of the requirements for the preparation and assessment of a PHA is provided in Appendix 5 of the SEPP 33 Guidelines.

4.4.2.1 Industrial equipment containing quantities of dangerous goods

All industrial equipment that contains quantities of dangerous goods will be included in the quantification of dangerous goods present on the warehouse premises. Any materials of this nature will be considered to be part of the overall quantities of dangerous goods being stored on site.

4.4.2.2 Identification of Inbound and outbound quantities of dangerous goods

The review of total dangerous goods quantities held on the warehouse premises will provide the organisation with visibility of held quantities relative to threshold values. When compared to foreseeable receipt and despatch schedules for dangerous goods into and from the warehouse premises the potential for any exceedance of screening threshold values can be determined and will enable appropriate action to avoid an exceedance. Moreover, due the requirements of Hazard Analysis of Critical Control Points (HACCP) a formal risk assessment must be carried out prior to the storage of dangerous goods in the warehouse.

4.4.3 Annual and Weekly Road Movements

The warehouse operation may also be potentially hazardous if the number of generated traffic movements for significant quantities of hazardous materials entering or leaving the site is above the cumulative annual or peak weekly vehicle movements identified in Table 4-5, below (SEPP 33 Guideline table 2 (p. 21)).

If the warehouse activity is found to be potentially hazardous with respect to transportation, a route evaluation study would be completed in accordance with Hazardous Industry Planning Advisory Paper No. 6— Route Selection.

Table 4-5 Annual and weekly hazardous material vehicle movement thresholds.

Class	Vehicle Movements		Minimum Quantity*		
	Cumulative	Peak	per load (tonne)		
	Annual	or	Weekly	Bulk	Packages
1	see note		see note	see note	

	Vehicle Movements		Minimum Quantity*	
2.1	>500	>30	2	5
2.3	>100	>6	1	2
3PGI	>500	>30	1	1
3PGII	>750	>45	3	10
3PGIII	>1000	>60	1 0	no limit
4.1	>200	>12	1	2
4.2	>100	>3	2	5
4.3	>200	>12	5	10
5	>500	>30	2	5
6.1	all	all	1	3
6.2	see note	see note	see note	
7	see note	see note	see note	
8	>500	>30	2	5
9	>1000	>60	no limit	

Note: Where proposals include materials of class 1, 6.2 or 7, the Department of Planning should be contacted for advice.

**If quantities are below this level, the potential risk is unlikely to be significant unless the number of traffic movements is high*

4.4.4 Material Incompatibility

Dangerous or other goods are incompatible with dangerous goods if:

- The goods are determined under the ADG to be incompatible with the dangerous goods or
- When the goods are mixed, or otherwise brought into contact, with the dangerous goods, the goods are likely to interact with the dangerous goods and increase risk because of the interaction.

NOTE: For compatibility guidelines based on classification, see Chapter 9.1 and 9.2 of the ADG.

Reference is made to relevant SDS to determine if risk of a hazard increases through proximity to incompatible materials.

Separation and segregation of incompatible materials through handling, use and storage is maintained to minimise risks.

To prevent food (including animal feed) from becoming contaminated, food are stored in sealed containers and isolated from chemicals.

5 MONITOR AND REVIEW

5.1 Environmental Monitoring

Environmental monitoring and review will be undertaken by Qube Holdings/ EMC to verify:

- The effectiveness of environmental controls and
- Implementation and conformance to the requirements of this WOEMP and the CoC.

Responsibilities for monitoring activities are identified within Section 0 and Table 4-1. Monitoring may also be required as a follow-up response to incidents.

Table 5-1 summarises monitoring and reporting requirements for WH5.

Table 5-1 Monitoring and reporting requirement summary

CoC SSD7628	Monitoring Requirement	Frequency
A32	Maintenance and operation of plant and equipment	Routine maintenance as per manufacturer's specifications. Reactive maintenance on a need's basis.
B2(i)	Monitor effectiveness of effectiveness of traffic control measures	6-monthly
B29	Monitor employee numbers	Annual Reporting for 5 years
B59(d); B60 and B61	Monitoring and reporting of all emissions sources	6-monthly to align with compliance reporting requirements
B84; B85	Noise Assessment for Mechanical Plant	Required prior to construction and in response to any change in mechanical plant and other equipment.
	Noise monitoring of installed and operating mechanical plant – Preparation of Monitoring Report for Mechanical Plan	Monitoring required for minimum of 1 week following occupation. Report to be submitted to the Secretary within 2 months of occupancy to verify predicted noise levels.
B90	Report on any continuous improvement activities for noise reduction	Annual contribution to B90 Annual Review by Qube Holdings/ EMC
B112-B115	Monitor quantities of dangerous goods present at any time within the premises and transported to and from the premises. Report on process and methodology to ensure quantities remain below screening threshold quantities.	Provision of report for approval by the Secretary, confirming premises compliance with B112 and 114, prior to occupation.
B116	Record training and testing programs for Emergency Response.	Reported annually.
B120 – B126	Retention of waste stream monitoring, assessment, classification, collection and disposal records.	Reported in the 6-monthly compliance report.
B127	Premises monitoring for effectiveness of management measures. Retain records of pesticide and herbicide application.	6-monthly to align with compliance reporting requirements
B142	Monitoring of implementation of ESD initiatives	Included within annual environmental performance review (C10)

CoC SSD7628	Monitoring Requirement	Frequency
C10	Review of environmental performance of the development	Reported annually
C11 – C17	Monitoring, review and reporting of incidents/non-compliances and resultant notifications, investigations and reporting.	Reported in 6-monthly compliance reports and in annual environmental performance report (C10). Content expectations included in Appendix C of the CoC.
C21	Environmental Management Compliance Report	6-monthly

5.1.1 Site Inspections

Monthly site environmental inspections will be undertaken by Qube to verify that environmental controls are in place, being maintained and are effective. The results of the monthly environmental inspections are to be noted on the environmental inspection checklist (Appendix A) with any subsequent actions recorded in the Corrective Actions Register to be actioned by nominated representatives. Results of the monthly environmental inspection reports are to be included in the Environmental Management Compliance Report (Section 5.1.2).

5.1.2 Environmental Management Plan Audit and Reporting

Annual audits will be conducted in addition to other ad hoc inspections, to verify environmental performance of this WOEMP and in accordance with internal audit procedure. The scope of the work to be covered in an audit may include the following:

- Compliance with legislation
- Address of operation CoC
- Internal chemicals used (hazardous chemicals) and external DGs from customers on a case by case basis.
- Mitigative measures specified in this WOEMP are being implemented and remain adequate and appropriate
- Environmental reports are being completed and any actions implemented and closed out and
- Environmental incidents are being recorded, actioned and closed out.

An Environmental Management Compliance Report will be prepared which will review compliance with the CoC and this WOEMP. This report will be completed on a six-monthly basis and will form part of the overarching compliance report that Qube Holdings/ EMC will submit to the DPIE in accordance with CoC C21.

5.2 Environmental Management Records

All documentation received, generated or stored pertaining to environmental matters will be managed and maintained on site in accordance with any statutory requirement and the Safety, Health and Sustainability Policy, in particular document approval, identification, storage, protection, retention, distribution, revision, retrieval and, when appropriate, disposal.

Environmental records, which are collated and held onsite to demonstrate compliance with environmental obligations may include training and induction records and documentation to support the purpose and objectives of the Safety, Health and Sustainability Policy.

5.3 Non-Conformance and Corrective Actions

In the event that a non-conformance involving failure to implement or adhere to the identified requirements of this WOEMP does occur, the adverse environmental condition, or incident in the implementation/ operation

of the WOEMP shall be reported to the Warehouse Manager. Noting that certain incidents are notifiable to the State Regulator and a Person Conducting a Business or Undertaking is required to notify such incidents in accordance with their obligations (Part 3 of the WHS Act). Any non-conformance will be managed in accordance with the Safety, Health and Sustainability Policy.

In accordance with the requirements of CoC C11 – C17, non-conformances that are also considered to be an incident or warrant notification will be provided to Qube Estate Management.

5.4 Complaint Handling

All complaints are to be recorded and promptly notified and responded to. Details and logs of telephone calls, correspondence and email received are to be documented and actioned to respond to all complaints within eight business hours. Correspondence will be physically responded to within two business days, though final resolution of the issue may take longer, depending on the complexity of the issue.

A complaint register will be maintained and updated at least monthly that will record:

- The detail of each complaint (including complainant details and contact details)
- Immediate actions taken
- Recommended corrective and/ or preventive action to be taken following investigation of the complaint
- Actions reviewed
- Justification for not implementing any actions
- Agreed actions tracked to completion and
- Verification of satisfactory closeout of complaint.

Where a complaint requires further investigation and resolution, this process is to be managed by Qube Estate Management in consultation with the Warehouse Manager until it has been resolved satisfactorily. At the conclusion of this process the relevant database is to be updated.

The organisation is to notify Qube Estate Management of any complaints received in writing including where:

- A complaint is made, or any proceedings are instituted or threatened
- A letter of demand is issued and/or
- An order or direction is made.

5.5 Review and Continuous Improvement

This WOEMP is a 'live' document with the ability to change as the operational situation changes. These changes can be in the form of recommendations from the organisation Management, external auditor, Qube Holdings/ EMC or site employees.

This WOEMP will be reviewed formally on an annual basis in consultation with stakeholders as required.

Review may also take place immediately after any significant incident or change to the activities, products or services or material changes in the operating conditions.

The master 'controlled' WOEMP document shall be held on the site computer network server. A hard copy of the WOEMP will be provided in the main office onsite for use and reference by all employees, contractors and visitors.

All paper copies of this WOEMP shall be considered as 'uncontrolled' unless they have been allocated a 'copy number'. Where required, controlled copies of this WOEMP shall be published as a hard copy, allocated a copy number and distributed as appropriate.

APPENDIX A ENVIRONMENTAL INSPECTION CHECKLIST

Site: Warehouse 5

Date/ Hour:

Prepared By:

Weather:

NA: Non-Applicable

	Compliant		Comments
	Yes	No	
1. Records Inspection			
Incidents – Have any incidents occurred? If so, have they been appropriately documented? Has Qube Holdings been notified (if required)?			
Spill Response - Performed since the last inspection? Any additional corrective action or maintenance required e.g. replenish spill kits, follow up?			
Public Complaints – Any received since last inspection (e.g. noise, traffic, odour)? If so, describe main issue, closed out?			
Plant Maintenance - Any works undertaken since the last inspection that may impact the environment?			
2. Site Inspection			
Stormwater Channel – Any litter, sediment build up, visible sheen, oil slick or damage?			
Hazardous Substances - Are hazardous substances/ dangerous goods stored correctly?			
Hazardous Substances – Are MSDS missing or out of date for hazardous substances/ dangerous goods?			

	Compliant		Comments
	Yes	No	
Bunds - Are hazardous material containment structures (bunds) damaged and/or in need of maintenance?			
Spill Kits – Do spill kits require restocking or are additional spill kits required?			
Laydown/ Storage Area – Waste accumulation, chemicals/ hazardous materials stored incorrectly, access blocked?			
Weeds and Pests – Are they being managed in accordance with EMP requirements? Is spraying/ physical removal required? Any been observed onsite since the last inspection?			
Waste Management - Have stored waste quantities reached 80% capacity? If so, organise licensed contractor to dispose.			
Waste Management – Have wastes been inappropriately stored? i.e. characterised for appropriate disposal where relevant.			
Dust, Odour, Noise - Are there are noise, odour or dust issues onsite?			
Housekeeping - Do roads, footpaths and storage/ laydown areas require maintenance or housekeeping? i.e. removal of rubbish.			
Other			

Name: _____ Signature _____ Date _____

APPENDIX B MECHANICAL PLANT AND EQUIPMENT NOISE ASSESSMENT

In accordance with CoC B84 and B85 (SSD 7628), a Noise Assessment for Mechanical Plant and other noisy equipment is to be undertaken and submitted to the Secretary to demonstrate that plant has been selected to meet the overall operational noise limits specified in the CoC. Typical equipment used in the warehouse and their respective sound power levels are identified on table 5-2 below.

Table 5-2 Plant and equipment and associated sounds levels

Plant	Sound Power Level	Sound Pressure Level at 7 m	Internal or External Use
Truck and dog	103	78	External
Loaders	112	87	External
Mobile cranes	110	85	Internal
Crane (machine)			Internal
Forklifts	106	81	Internal/External
Conveyor system			Internal
Automated guided vehicle			Internal/External
Industrial robot			Internal
Electric track vehicle system			Internal
Pallet racking			Internal
Automated storage and retrieval system			Internal

APPENDIX C DANGEROUS GOODS SCREENING THRESHOLDS AND SUPPORTING INFORMATION

This Appendix contains extracted tables and reference material from the following documents:

- Hazardous and Offensive Development Application Guidelines Applying SEPP 33 (Department of Planning, January 2011)
- University of Wollongong School of Chemistry:
<https://smah.uow.edu.au/content/groups/public/@web/@sci/@chem/documents/doc/uow019937.pdf>

Applying SEPP 33 | January 2011

Table 1: Screening Method to be Used

Class	Method to Use/Minimum Quantity
1.1	Use graph at Figure 5 if greater than 100 kg
1.2-1.3	Table 3
2.1 — pressurised (excluding LPG)	Figure 6 graph if greater than 100 kg
2.1 — liquefied (pressure) (excluding LPG)	Figure 7 graph if greater than 500 kg
LPG (above ground)	table 3
LPG (underground)	table 3
2.3	table 3
3PGI	Figure 8 graph if greater than 2 tonne
3PGII	Figure 9 graph if greater than 5 tonne
3PGIII	Figure 9 graph if greater than 5 tonne
4	table 3
5	table 3
6	table 3
7	table 3
8	table 3

Note: Classes 1.4, 1.5, 1.6, 2.2, 7 and 9 are excluded from the risk screening.

Table 3: General Screening Threshold Quantities

Class	Screening Threshold	Description
1.2	5 tonne	or are located within 100 m of a residential area
1.3	10 tonne	or are located within 100 m of a residential area
2.1	(LPG only — not including automotive retail outlets ¹) 10 tonne or 16 m ³ if stored above ground 40 tonne or 64 m ³ if stored underground or mounded	
2.3	5 tonne	anhydrous ammonia, kept in the same manner as for liquefied flammable gases and not kept for sale
	1 tonne	chlorine and sulfur dioxide stored as liquefied gas in containers <100 kg
	2.5 tonne	chlorine and sulphur dioxide stored as liquefied gas in containers >100 kg
	100 kg	liquefied gas kept in or on premises
	100 kg	other poisonous gases
4.1	5 tonne	
4.2	1 tonne	
4.3	1 tonne	
5.1	25 tonne	ammonium nitrate — high density fertiliser grade, kept on land zoned rural where rural industry is carried out, if the depot is at least 50 metres from the site boundary
	5 tonne	ammonium nitrate — elsewhere
	2.5 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers <30 kg
	1 tonne	dry pool chlorine — if at a dedicated pool supply shop, in containers >30 kg
	5 tonne	any other class 5.1
5.2	10 tonne	
6.1	0.5 tonne	packing group I
	2.5 tonne	packing groups II and III
6.2	0.5 tonne	includes clinical waste
7	all	should demonstrate compliance with Australian codes
8	5 tonne	packing group I
	25 tonne	packing group II
	50 tonne	packing group III

Note: The classes used are those referred to in the Australian Dangerous Goods Code and are explained in Appendix 7.

Figure 5: Class 1.1 Explosives

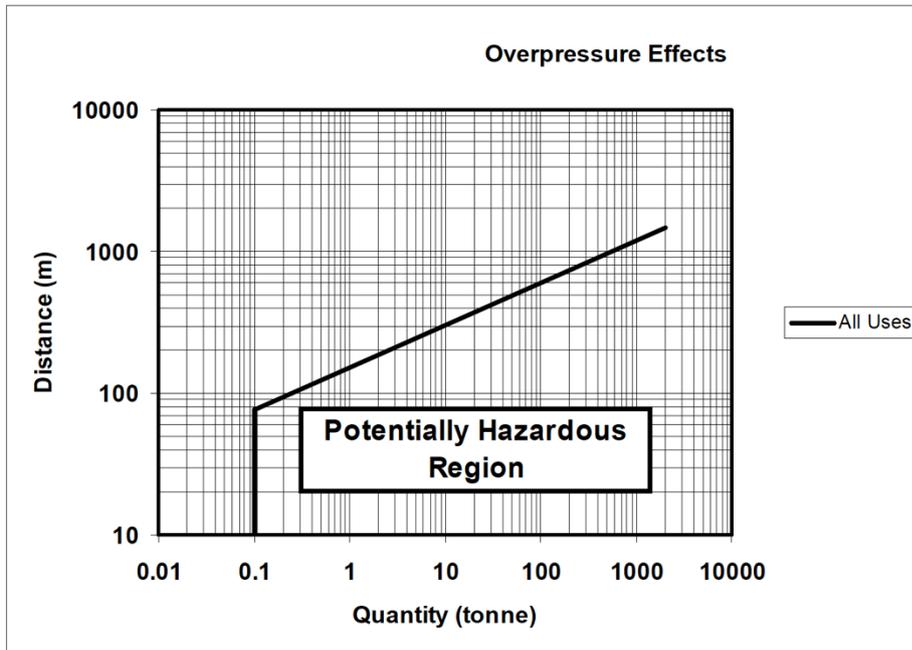


Figure 6: Class 2.1 Flammable Gases Pressurised (Excluding LPG)

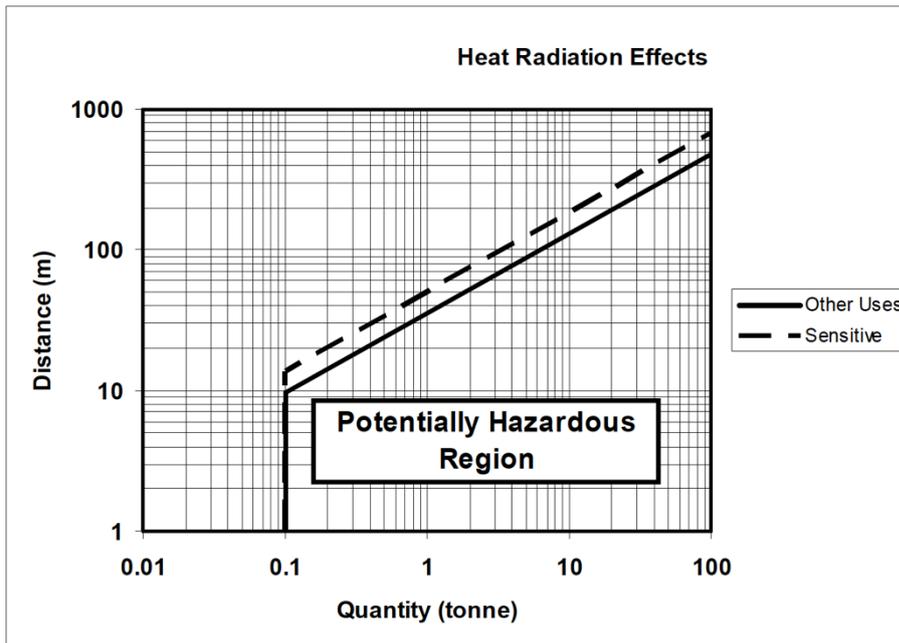


Figure 7: Class 2.1 Flammable Gases Liquefied Under Pressure (Excluding LPG)

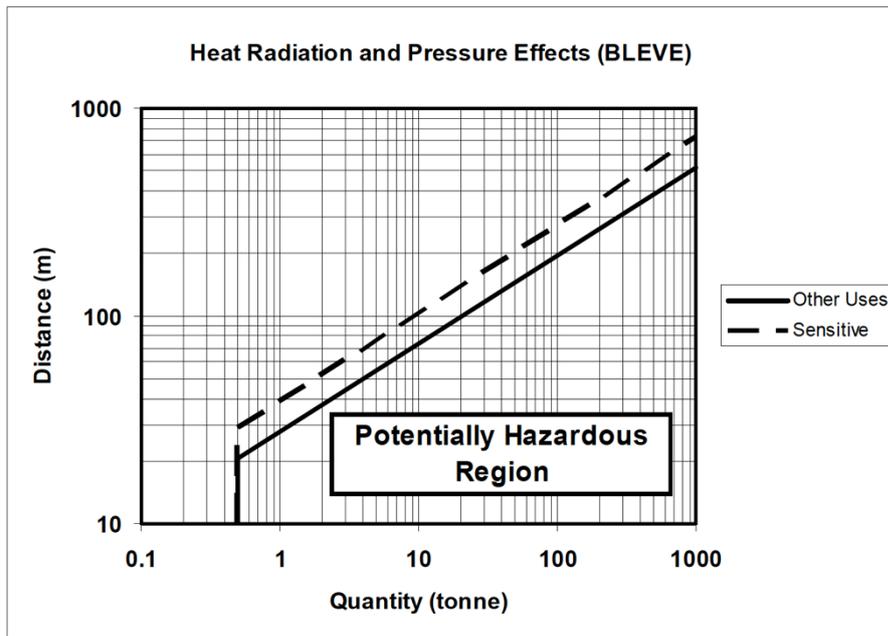


Figure 8: Class 3PGI Flammable Liquids

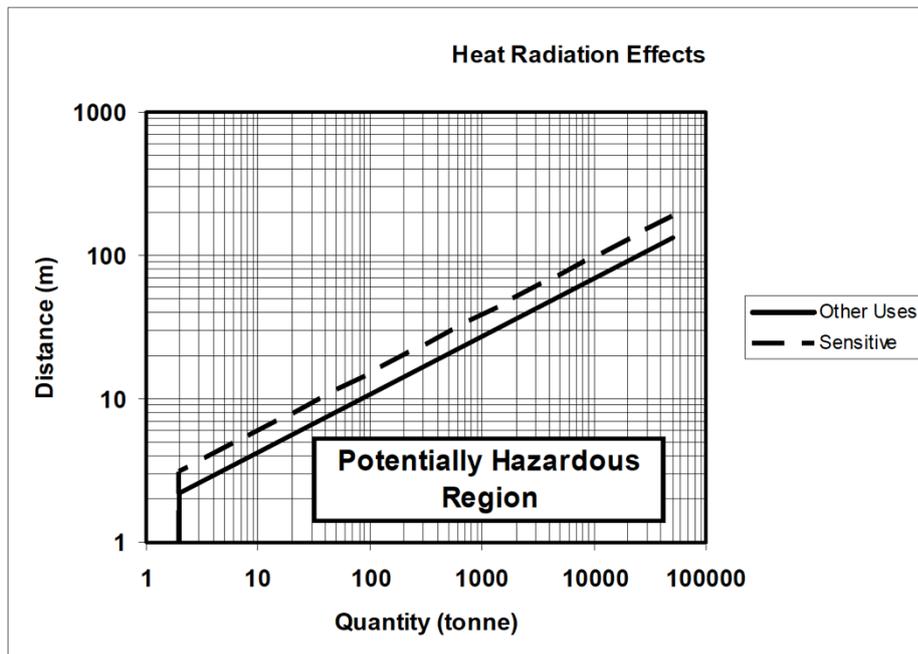
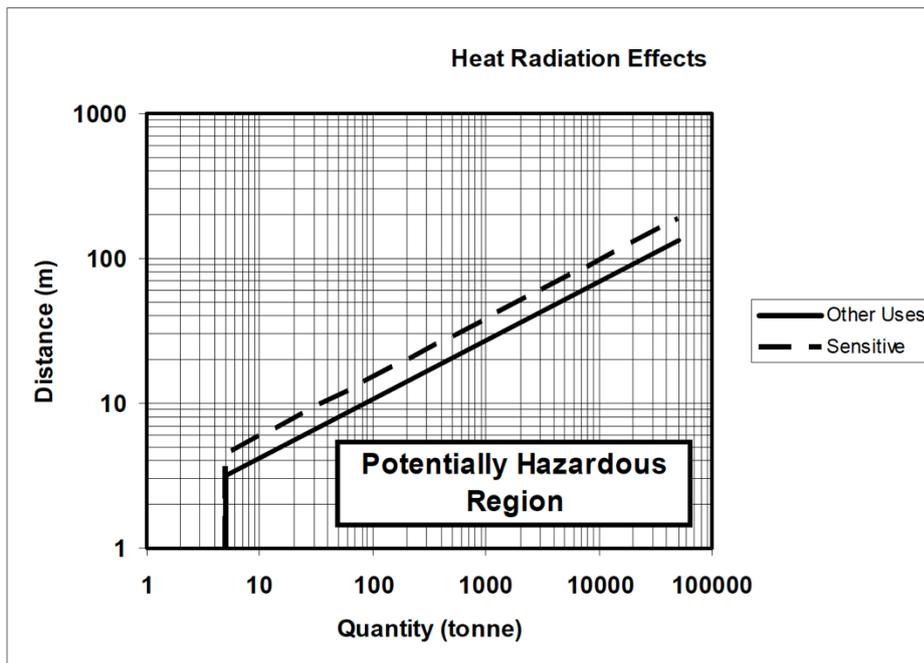


Figure 9: Class 3PGII and 3PGIII Flammable Liquids



Class Diamonds



UN Numbers and Shipping Names

In Australia, dangerous goods are defined by the Australian Dangerous Goods Code (ADG). These are closely aligned with international standards in the United Nations 'Recommendations on the Transport of Dangerous Goods - Model Regulations'. Proper shipping names and UN numbers are assigned and used internationally for the quick identification of dangerous goods. The University is required to use this standard

terminology, for example when labelling hazardous waste for transport, submitting information to WorkCover NSW or communicating with emergency services.

A UN number is a four-digit number representing a particular chemical or group of chemicals e.g. UN1170 represents Ethanol, and UN1263 represents Paint and Related Products. The proper shipping name for a particular substance is the name used to describe that substance during transport. The proper shipping name for ethanol is "Ethanol", but the proper shipping name for a less common substance will be a generic description, e.g. "Flammable Liquid n.o.s." (not otherwise specified). In this case, the chemical name of the substance will be included in brackets following the generic description.

Packing Groups

Packing groups are used to indicate the degree of danger associated with dangerous goods within a given class.

Packing Group I	Great Danger
Packing Group II	Medium Danger
Packing Group III	Minor Danger