

Prepared for
Crawfords Freightlines

Prepared by
Ramboll Australia Pty Ltd

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2022 INDEPENDENT ENVIRONMENTAL AUDIT CRAWFORDS WAREHOUSE FACILITY

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Independent Audit Table

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Independent Audit Declaration Form

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Consultation

GLOSSARY

AST	Aboveground Storage Tank
ACM	Asbestos-containing material
AN	Ammonium Nitrate
ANZECC	Australian and New Zealand Environment and Conservation Council
AR	Annual Return
AS	Australian Standard
bgl	Below ground level
Crawfords	Crawford Freightlines Pty Ltd
DA	Development Application
DDGs	Dust Deposition Gauges
DPE	NSW Department of Planning & Environment
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EPL	Environmental Protection Licence
ERM	Environmental Resources Management Australia Pty Ltd
GHG	Greenhouse gases
IAPAR	Independent Audit Post Approval Requirements
IBCs	Intermediate Bulk Containers
IEA	Independent Environmental Audit
km	kilometre
NCC	Newcastle City Council
NSW	New South Wales
OEH	NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
OH&S	Occupational Health and Safety
OFI	Opportunity for Improvement
PAH	Polycyclic Aromatic Hydrocarbon
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations (Act)
PRP	Pollution Reduction Program
Ramboll	Ramboll Australia Pty Ltd
RTS	The Response to Submissions titled 'Ammonium Nitrate Storage and Distribution Facility' and accompanying appendices, prepared by Environmental Resources Management Australia and dated April 2013
SMS	Safety Management System
TMP	Traffic Management Plan
WMP	Water Management Plan
2015 IEA	Ramboll Australia Pty Ltd, Independent Environmental Audit, Crawfords Ammonium Nitrate Facility, Final 09/09/15
2018 IEA	Ramboll Australia Pty Ltd, Independent Environmental Audit, Crawfords Ammonium Nitrate Facility, Final 29/08/18

1. EXECUTIVE SUMMARY

Ramboll Australia Ltd (Ramboll) has been engaged by Crawfords Freightlines Pty Ltd ('Crawfords') to conduct an Independent Environmental Audit ('IEA') of the Crawfords Warehouse Facility (the 'site') located at Lot 12 Deposited Plan (DP) 625053, Old Maitland Road, Sandgate, New South Wales (NSW). The IEA is a statutory requirement by the NSW Department of Planning and Environment (DPE) as a condition of the Development Consent (File No. SSD-5119), refer to Schedule 4, Condition 4.

The Crawfords Warehouse Facility comprises the storage of Ammonium Nitrate (AN) in two warehouses (Sheds A and B) and storage of other materials in two other warehouses (Sheds C and D), as well as outdoor storage areas for shipping containers.

The Development Consent SSD-5119, issued on 13 June 2013, remains current with no modifications during the Audit Period. The Environmental Protection Licence 20295 (EPL 20295) has had two Licence Variations during the Audit Period with the latest variation issued by the NSW Environmental Protection Authority (EPA) on 16 July 2019.

This Audit is the third IEA for this development. The first IEA was conducted by Ramboll in July 2015 (herein referred to as the '2015 IEA'). The second IEA was conducted by Ramboll in August 2018 (herein referred to as the '2018 IEA').

The objective of the Audit was to independently assess the environmental performance and compliance status of the site's operations during the Audit Period. The Audit Period is from 27 July 2018 to 12 September 2022.

The Auditors considered the storage of Ammonium Nitrate (AN) in Sheds A and B to be managed adequately with good housekeeping and stock count tracking. There appeared to be no notifiable incidents or community complaints except in relation to trucks off-site. However, exceedances of stormwater assessment criteria and long term criteria for deposited dust have not been notified to the Department. The Auditors assessed the development to be compliant with SSD 5119 and EPL 20295 except for thirty-one non-compliances, of which twenty-seven have non-compliance (NC) numbers to avoid duplication of findings and recommendations. Twenty-three recommendations have been made in relation to the non-compliances as follows:

- NC1, Schedule 2, Condition 1; NC8, Schedule 3, Condition 11; NC12, Schedule 3, Conditions 22 & 23; NC21, L1.1 – Stormwater discharged from site continues to exceed stormwater quality assessment criteria, indicating that the Water Management Plan, including the Stormwater Management Plan, require improvement. No analysis was completed for dissolved oxygen, chlorophyll, filterable reactive phosphate; and oxides of nitrogen which are listed in the Table 3.3.2 of the ANZECC Guidelines. Review the Water Management Plan, including the Stormwater Management Plan, to identify improvements that would contribute to improving water quality so as to comply with water quality assessment criteria. Document identified improvement actions, such as the work underway to improve the stormwater retention ponds, in the Water Management Plan. Include groundwater quality assessment criteria in the Water Management Plan.
- NC2, Schedule 2, Condition 2 – Condition 2 is considered non-compliant based on the number of non-compliances with the conditions of this consent, including EPL 20295 requirements. Review the findings of this Audit and consider developing a compliance tracking system that can be reviewed on a regular basis to prevent future non-compliances.
- NC3, Schedule 2, Condition 4 – Crawfords has not complied with the reasonable requirements of the Planning Secretary. Ensure that directions and requests from the Department are complied with in accordance with Condition 4 requirements.
- NC4, Schedule 2, Condition 6 – No documentation has been provided to confirm written approval from the Department of the Off-Site Restricted Access Area Strategy. Obtain the written approval of the Planning Secretary every 12 months from the date the Department approved the Off-Site Restricted Access Area Strategy and retain the records on file.

- NC5, Schedule 2, Condition 12; Condition O2.1 – Maintenance issues were observed related to bunds. Inspect and maintain control measures such as bunds to ensure sufficient capacity to contain spills. Clean up spills to prevent potential contamination of soil and groundwater.
- NC5, NC15, NC21 – NC27, Schedule 3, Condition 1 – The Auditors found nine non-compliances with EPL 20295. Refer to NC5, NC15 and NC21 to NC27 for details on the non-compliances and recommendations.
- NC6, Schedule 3, Condition 8 – Hazard Audits have not been conducted at the required frequency of every two years. Establish a process to ensure that Hazard Audits are conducted every two years or at such intervals as the Planning Secretary may agree. Retain records related to the conduct of Hazard Audits including the approval of the Auditor / Audit Team, the submission of the HA report to DPE and Planning Secretary's approval.
- NC7, Schedule 3, Condition 9 – The Safety Management System (SMS) Manual does not include maps showing the risk contours for on-site and off-site risks, which is considered non-compliant. Ensure that the SMS Manual includes maps showing the risk contours for on-site and off-site risks.
- NC9, Schedule 3, Condition 12 – A number of Intermediate Bulk Containers (IBCs) were observed that were not banded. Pallet bunds are used in the Shed D Workshop to store IBCs of oil and the concrete floor was stained black in places from spills around the pallet bunds that had not been cleaned up properly. Conduct a review of the house keeping practices, monitoring and maintenance of chemical storage within Shed C and D, including the adequacy of bunding in the Workshop. It is also recommended that a review of chemical labelling be undertaken.
- NC10, Schedule 3, Condition 17 – The Structural Certificates were not sighted within the Flood Risk Management and Response Plan or Site Emergency Plan and the Operational Environmental Management Plan (OEMP). Implement a procedure to ensure the structural certification documents are included as an appendix to the site emergency response plan and OEMP.
- NC11, Schedule 3, Condition 21 – The Site Emergency Plan did not include a copy of the structural certification and a staff training program to be implemented. Evidence of consultation with Council and the NSW Office of Environment and Heritage (OEH) and approval by the Planning Secretary had not been provided for review by the Auditors for the revised Site Emergency Plan. A review of the current Site Emergency Plan should be undertaken in consultation with Council and the OEH and approved by the Planning Secretary. A procedure should be implemented to ensure the structural certificates are attached to the plan. The Site Emergency Plan should include a flood response staff training program including maintaining records of drills.
- NC13, Schedule 3, Condition 25 – The facility has operated outside of the approved operating hours. Ensure that the approved hours of operation are complied with, as shown in Condition 25 or as otherwise agreed in writing by the Planning Secretary.
- NC14, Schedule 3, Conditions 30 – The results of the 2020 dust monitoring reported continued elevated deposited dust concentrations above the long term criteria throughout 2020 both on and off site. Review the air quality monitoring program to assess whether deposited dust monitoring at additional offsite locations would provide a more accurate determination of whether deposited dust levels at any private residential receiver or 25% of privately owned land surrounding the site are in fact being exceeded. Evaluate current dust mitigation measures as part of the revision of the OEMP.
- NC15, Schedule 3, Condition 32; Condition O3.1 – Elevated levels of dust were observed during the site visit and elevated concentrations of deposited dust were identified through air quality monitoring. Review and improve dust mitigation measures to minimise dust emissions from operation of the development.

- NC16, Schedule 3, Condition 34 – Elevated levels of dust observed during the site visit and elevated concentrations identified through air quality monitoring, both of which indicate that the Air Quality Management Plan has not been effective. Review and revise the Air Quality Management Plan to incorporate improved dust mitigation measures.
- NC17, Schedule 3, Condition 36 – The trains that visit the site may include up to 3 locomotives and 55 wagons, which exceeds the maximum allowed number of carriages. Review train movements to assess compliance with Condition 36. Ensure that Condition 36 requirements are met or alternatively, seek DPE approval to vary Condition 36.
- NC18, Schedule 4, Condition 2 – The OEMP was not revised following the 2018 IEA or following the direction of the Department in 2020. Review and revise the OEMP to address recommendations of this Audit, as well as any outstanding recommendations from the 2018 IEA and the Department's directions. Submit the revised OEMP to DPE for approval.
- NC19, Schedule 4, Condition 3 – Exceedances of stormwater and dust criteria have occurred that have not been notified to DPE. In addition to incidents, ensure that an exceedance of a limit / performance criterion in this consent is notified to DPE and other relevant agencies of the exceedance immediately (or as soon as practical thereafter). Submit a written detailed report within 7 days of the exceedance (or incident).
- NC20, Schedule 4, Condition 4 – IEAs have not been conducted at the required frequency of every three years. Ensure that future IEAs are conducted every 3 years. The next IEA site visit should be conducted by 27/05/24 or as otherwise agreed with DPE.
- NC22, Condition O5.2 – Pallet bunds used to store IBCs and are not best practice for the permanent storage of IBCs and drums (e.g. waste oil in the Workshop in Shed D). There was evidence of spills outside pallet bunds. The Quarantine Wastewater aboveground storage tank (AST) bund appeared to be almost half full of water and therefore, may not have sufficient capacity in the event of a leak. Ensure that bunds are inspected and maintained in order that the bunds has sufficient capacity in accordance with Condition O5.2 requirements. Consider installing a properly constructed bund(s) in the Workshop and elsewhere as considered necessary that meets the requirements of Condition O5.2.
- NC23, Condition O7.2 – Methyl bromide cylinders was observed in the northern container storage area and it cannot be verified that methyl bromide was not in use during the course of the Audit Period. Remove the methyl bromide cylinders from the site. Ensure that methyl bromide is not used for any purpose at the site.
- NC24, Condition O7.3 – Wood fumigation activities were carried out onsite up until 2020. No recommendation is made as wood fumigation activities have now ceased.
- NC25, Condition M4.2 – Crawford's Incident and Compliance Action Tracker does not identify sections in the tracker where the time of a complaint, or the method by which the complaint was made could be populated if a complaint were to occur. Review and update the Incident Register & Compliance Action Tracker to include the required details in accordance with Condition M4.2.
- NC26, Condition R1.5 – The 2018/2019, 2019/2020 and 2020/2021 Annual Returns (ARs) were received by the EPA more than 60 days after the end of each reporting period. Review the process for preparing and submitting Annual Returns to ensure that they are submitted within the 60-day timeframe.
- NC27, Condition U1.1 – No documentation has been provided to confirm when paving works have been completed or the reports required to be supplied to the EPA of the description of the works completed. If not already completed, reports of the paving works and reports to be submitted to the EPA.

Recommendations have been made in relation to eleven opportunities for improvement as follows:

- Schedule 3, Condition 3 – It was observed that the painted lines were faded in places. The stock count total number of bags and tonnages is not transferred or recorded in a summary spreadsheet and therefore the quantity of AN onsite cannot be readily determined or tracked without reviewing individual daily stock count worksheets. Refresh the painted lines in Sheds A and B so that the bulka-bags are kept within the required areas. Review the AN stock count system and consider adding a monthly summary worksheet and graph that tallies the total number of bags and tonnages in each Shed. The monthly tally can then be consolidated in an annual or ongoing spreadsheet that tracks the quantities over time.
- Schedule 3, Condition 5 – The Site Emergency Plan and Pollution Incident Response Management Plan (PIRMP) are not being tested in the field sufficiently and records detailing the nature of the exercise/test, attendance record and required improvements were not available for review. Ensure that records of testing of the Site Emergency Plan and PIRMP, which detail the nature of the exercise/test, attendance record and required improvements, are retained and readily available for review on request. Ensure that other monitoring requirements are being carried out and records retained in accordance with the Site Emergency Plan, PIRMP, OEMP and SMS Manual and Condition 5 requirements.
- Schedule 3, Condition 20 – Given recent major flooding in NSW, likely due to climate change impacts, a review of flood emergency response equipment is warranted. If it has not already been done, review the flood emergency response equipment as part of the OEMP review.
- Schedule 3, Condition 31 – During the site visit, the Auditors observed some forklifts that appeared to be driving at a speed potentially higher than the 10 kilometres per hour (km/h) speed limit, however, this could not be verified. Review forklift driving procedures and training to confirm all site personnel understand the speed limit at the site.
- Schedule 3, Condition 38 – The Traffic Management Map is out of date as it still indicates that the northern end of the site is used for “*Timber Parking*”, which reportedly ceased in 2020. Attach the current Site Map to the Crawfords Site Induction.
- Schedule 3, Condition 39 – Collectively, it is considered that the 2013 Traffic Management Plan (TMP), 2013 OEMP and SMS Manual generally meet the requirements of Condition 39 but the Auditors were unable to verify that a program to monitor the effectiveness of the measures is being implemented. Ensure that records are retained to demonstrate that a program to monitor the effectiveness of the TMP measures is being implemented as detailed in the 2013 TMP, 2013 OEMP and SMS Manual.
- Schedule 3, Condition 48 – Energy and water efficiency are not regularly reviewed. Review and revise the OEMP to include water efficiency measures and a process to regularly review opportunities to implement further energy and water efficiency measures, that is recorded.
- Condition L2.2 – A number of old transformers were observed stored onsite, which were reportedly not ‘waste’ but in transit to a client. Temporary storage of equipment that could be considered as waste may be potentially non-compliant. Review internal procedures regarding the transfer and temporary storage of equipment onsite to ensure that ‘waste’ materials are not received at site.
- Condition O3.2 – The site inspection identified the emissions of dust in areas where the surface was unsealed within the yard north of Shed C and south of Shed D. The site operations appear to be undertaking activities generally in accordance with the OEMP however dust is continuing to be emitted. A review of the dust mitigation measures to be undertaken as part of the OEMP review.
- Condition M5.2 – Telephone numbers for contacting Crawfords are provided on their website and their Facebook page but they are not advertised as a telephone complaints line with the possible exception of a ‘Safe Driving Contact’ telephone number, which is not directly related to the premises. No signage was observed advertising a telephone complaints line for

Crawfords at the entrance to the site. Notify the public of the telephone number that can be used to make a complaint, not necessarily related to safe driving issues. Erect a sign at the site entrance notifying the public of a telephone number for community complaints in relation to site activities or vehicle and mobile plant activities.

- Water monitoring – The Auditors understand that Crawfords environmental consultant provides water monitoring results but does not prepare water monitoring reports. Therefore, it is difficult to assess the validity of the monitoring data for the Audit Period or compare the results with baseline data, previous monitoring rounds or the assessment criteria and trigger levels. No graphs are available to assess contaminant concentrations over time for trends in the data. Analysis of the results and comparison of groundwater and stormwater monitoring results may assist with understanding if there is interaction between groundwater and stormwater in the bio retention basins, which we understand is suspected. Obtain monitoring reports for required water monitoring prepared generally in accordance with the EPA's guidelines.

2. INTRODUCTION

2.1 Background

Ramboll Australia Ltd (Ramboll) has been engaged by Crawfords Freightlines Pty Ltd ('Crawfords') to conduct an Independent Environmental Audit ('IEA') of the Crawfords' Ammonium Nitrate (AN) Storage and Distribution Facility (the 'site') located at Lot 12 Deposited Plan (DP) 625053, Old Maitland Road, Sandgate, New South Wales (NSW). The IEA is a statutory requirement by the NSW Department of Planning and Environment (DPE) as a condition of the Development Consent SSD-5119, refer to Schedule 4, Condition 4.

Crawfords has operated a storage and distribution facility at the site since 2009. The development is located off Old Maitland Road at Sandgate, NSW and comprises the storage of AN in two warehouses (Sheds A and B) and storage of other materials in two other warehouses (Sheds C and D), as well as outdoor storage areas for shipping containers. The site area is reportedly 87,700 m².

The Development Consent SSD-5119, issued on 13 June 2013, remains current with no modifications during the Audit Period. EPL 20295 has had two Licence Variations during the Audit Period with the latest variation issued by the EPA on 16 July 2019.

This Audit is the third IEA for this development. The first IEA was conducted by Ramboll in July 2015 ('2015 IEA'). The second IEA was conducted by Ramboll in August 2018 ('2018 IEA').

The objective of the Audit was to independently assess the environmental performance and compliance status of the site's operations during the Audit Period, which is from 27 July 2018 to 12 September 2022.

2.2 Audit Team

The Audit Team comprised Victoria Sedwick (Lead Auditor), Emily Rowe (Auditor), Vanessa Perkins (Auditor) and David Ford (Auditor) of Ramboll. The Audit Report was prepared by Vanessa Perkins and Emily Rowe and reviewed by Victoria Sedwick and David Ford, and authorised by Victoria Sedwick.

2.3 Audit Objectives

The objective of the Audit was to independently assess the environmental performance and compliance status of the project during the Audit Period.

2.4 Audit Scope

The scope for the Audit is taken in accordance with SSD 5119 under Condition 4 in Schedule 4, as follows:

4. Within one (1) year of the commencement of operations of the development, and every three (3) years thereafter, or as otherwise agreed by the Director-General, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:
 - a) *be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Director-General;*
 - b) *include consultation with the relevant agencies;*
 - c) *assess the environmental performance of the development and assess whether it is complying with the relevant requirements in this consent and any relevant EPL (including any plan or program required under these consents);*
 - d) *review the adequacy of any plans or programs required under these consents; and, if appropriate;*
 - e) *recommend measures or actions to improve the environmental performance of the development, and/or any plan or program required under these consents.*

2.5 Audit Period

The 2015 IEA site visit were conducted on 26 May and 4 June 2015. The 2018 IEA site visit were conducted on 10 May and 26 July 2018. The site visit and interviews for this Audit were conducted on 12 September 2022. The Audit Period was 27 July 2018 to 12 September 2022.

3. AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

All of the Ramboll Auditors referred to in Section 2.2 are competent Auditors and have extensive experience in conducting environmental compliance audits and are independent from Crawfords. Victoria Sedwick and Emily Rowe are certified Lead Auditors with Exemplar Global (Certificate No. 13180 and 204997, respectively) and Vanessa Perkins is a certified Auditor with Exemplar Global (Certificate No. C-420260). As required under the Conditions of Consent, endorsement of the Audit Team by the Department of Planning and Environment (DPE or the Department) was provided in a letter dated 31 August 2022 (**Appendix B**).

3.2 Independent Audit Scope Development

The scope for this Audit was developed to review the site's activities; management of impacts on the environment from these activities; and to confirm compliance against the relevant Development Consent conditions and EPL for the facility. At the time of this Audit, there had been no approved modifications of Consent Conditions and two Licence Variations of the EPL 20295 with the latest variation issued by the EPA on 16 July 2019.

3.3 Compliance Evaluation

The following forms of evidence were gathered during the conduct of the Audit:

- Site inspection of the Crawfords facility on 12 September 2022, which included the taking of photographs;
- Review of documents, reports and other records including approvals, reports prepared to satisfy the conditions, site inspection checklists, site photographs, site plans and drawings, as well as correspondence with agencies including Newcastle City Council, the EPA and DPE;
- Interviews of site personnel during the site walkover on 12 September 2022 (refer Section 3.4);
- Review of documents posted on the internet including EPA and DPE websites.

3.4 Site Inspection and Interviews

The Crawfords facility was inspected by Emily Rowe and Vanessa Perkins on 12 September 2022. The following personnel were present during the site visit and accompanied the Auditors during all or part of the site inspection:

- Lauren Peppertrees, MHF Coordinator
- Joshua Conners, Maintenance Manager
- Allen Thompson, Inductions Coordinator
- Richard Trees, Rail Manager

3.5 Consultation

The following authorities were consulted as shown in Table 1. The responses received from DPE and DPE Water are provided in **Appendix E**.

Table 1: Consultation with Authorities

Authority	Contact Details	Comment
DPE	DPE Planning Portal Ann Hagerthy, Senior Compliance Officer Ann.Hagerthy@planning.nsw.gov.au	Letter requesting consultation submitted by Ramboll on 08/09/22. Refer to Table 2 for DPE comments received on 09/09/22 and the Auditors' response.
DPE Water	Tim Baker, Senior Project Officer Water Assessments Tim.baker@dpie.nsw.gov.au	Letter requesting consultation submitted by Ramboll on 08/09/22.

Authority	Contact Details	Comment
		Refer to Table 3 for DPE Water comments received on 12/09/22 and the Auditors' response.
EPA	Environment Line info@epa.nsw.gov.au	Letter requesting consultation submitted by Ramboll on 08/09/22. No response was received from the EPA, aside from a transmission receipt.
City of Newcastle	Development Officers mailto:mail@ncc.nsw.gov.au	Letter requesting consultation submitted by Ramboll on 19/09/22. No response was received from the City of Newcastle, aside from a transmission receipt.

Table 2: DPE Consultation

DPE Comment	Auditor Response
DPE requested the review of the following matters <i>"Compliance with the 9 metre stack separation requirement, unless for a short period of time when the ammonium nitrate storage is at maximum capacity, in Sheds A and B, as required by Schedule 3, Condition 3 of the consent; Dust management around the site and compliance with management plans; Accessibility and fire safety of storage in Shed D; Dust management in Shed C"</i>	Refer to Table A, Schedule 3, Condition 3 for discussion on compliance with the 9 m stack separation requirement. The Auditors have no evidence to indicate that Condition 3 is not being complied with. Refer to Table A, Schedule 3, Condition 30 and 32, and Table B, Conditions O3.1 and O3.2 for discussion on dust management. The Auditors found that Crawfords were implementing measures to suppress dust, however, vehicle movements was generating dust and air quality monitoring indicated that the measures have not been effective. The Auditors have not reviewed accessibility and fire safety of storage in Shed D in detail as this Audit is not a safety audit. However, three fire hose reels (two in the northern half and one in the southern half) were observed to be not readily accessible due to storage of chemicals or equipment (e.g. wheel washer) in close proximity to the fire hose reels. It was also observed that there was no access between the northern and southern halves of the workshop due to a large stack of bulka-bags containing concrete. The northern end of Shed D, which is used primarily for storage of chemicals, including 1,250 kg bulka-bags labelled as 'Vercell. Expandable Polystyrene, Flame Retardant' (Class 9, UN 2211), and miscellaneous equipment, may only have one exit. Vehicle movements in Shed C were not observed during the site visit. It is possible that they would generate some dust due to accumulated dirt on the concrete floor, but dust would likely be contained within the shed.

Table 3: DPE Water Consultation

DPE Water Comment	Auditor Response
DPE Water requested the review of the following specific matters: <i>"The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:</i> <i>o Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.</i> <i>o Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.</i> <i>• The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.</i> <i>• Water supply availability is clearly defined for the project.</i> <i>• Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.</i> <i>• Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.</i> <i>• Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.</i> <i>• Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated."</i>	Refer to Table A, Schedule 3, Conditions 22 and 23 for discussion on the site's Water Management Plan and Stormwater Management Plan. The Auditors understand that the site does not take or extract groundwater or surface water and is therefore, not required to hold a Water Access Licence. Some of DPE Water's request are therefore not relevant or considered within the scope of this Audit. The Auditors have no reason to believe that water metering at the site is not in accordance with the NSW Non-Urban Metering Framework where relevant.

3.6 Compliance Status Descriptors

This Audit Report has been prepared in accordance with the requirements for an Independent Audit Methodology and Independent Audit Report in IAPAR 2020. As such, the following compliance status descriptors have been used:

Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the Audit is undertaken, therefore an assessment of compliance is not relevant.

Observations have also been made that identify opportunities for improvement (OFI).

4. AUDIT FINDINGS

4.1 Approval and Document List

The following approvals and documents provided by Crawfords were reviewed by the Auditors:

- 2018 and 2019 DP1-5 data
- 2019-2020 Groundwater Monitoring Data.pdf
- 2020 EPA Annual Return Sandgate.pdf
- 2020-2021 Groundwater Monitoring Data .pdf
- 2021 EPA Annual Return Sandgate.pdf
- 2021.pdf, signed version of 2021 EPA Annual Return Sandgate
- 685761_COC.pdf
- 685761_summary.pdf
- 685761-W_report.pdf
- ACM Inspection Register dated 03/12/21
- Advitech 2021, Shed A, B and C Structural Inspection via Walkways
- Allshelter 2019, Shelter Assembly CATA1412A
- Annual Return – 2018/19, 2019/20, 2020/ 21, 2021/22
- Annual Return Data 2022 DP & MW.xlsx
- Annual Return Sandgate 08.09.2022 ARApplicationSummary_10883.pdf
- Better Transport Futures, Ammonium Nitrate Storage and Distribution Facility, Sandgate, NSW, Traffic Management Plan, Version 2, 20/06/13 (2013 TMP)
- Chain of Custody records dated 20/10/17 and 29/06/21
- COA 30 July 2020 (ES2026156_0_COA) (002).pdf
- Crawfords email to DPE, Independent Hazard Audit – Sandgate, 02/09/22
- Crawfords email to Ramboll, Operating Hours, 10/11/22
- Crawfords Freightlines Pty Ltd, Site Emergency Plan, Crawfords Freightlines Sandgate Site, Lots 12 and 22 Old Maitland Rd, Sandgate 2304 NSW, Rev 17, 3 May 2022
- Crawfords Group of Companies, Safety Management System Manual, Rev 24, November 2019 (not including appendices) (SMS Manual)
- Crawfords Site Induction – Sandgate Intermodal Terminal
- Crawfords, Code of Conduct, Rail Transport and Siding Operations, V1, Sept 2013
- Crawfords, Incident Register & Compliance Action Tracker(AutoRecovered).xlsx
- Crawfords, Pollution Incident Response Management Plan, Version 2, October 2021
- Crawfords, S.O.P. 51, Traffic Management Plan Sandgate, V2, July 2020
- DPE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility, Sandgate (SSD 5119), Proposed 2022 IEA Audit Team, 31/08/22
- DPE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility, Sandgate (SSD-5119) – Site Inspection Follow Up, 08/08/22, with attached:
- DPE letter to Crawfords, Crawfords Freightlines, Sandgate (SSD 5119) – 2022 Hazard Auditor Approval, 02/09/22
- DPIE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility (SSD 5119) Secretary Directions, 18/12/20
- Email from Crawfords to EPA dated 08/09/22, Ponds – Discussion from Friday
- Employee Details – Current Certification records
- EPA, Environment & Heritage | POEO Licences, Application and Notice Detail, Licence summary, 08/11/22
- ERM 2013. Operational Environmental Management Plan, 7 August 2013 (2013 OEMP)
- ERM 2015. Noise and Vibration Management Plan
- ERM, 2021, Crawford Monitoring Works – Air Quality Monitoring Report Reference Year 2020
- ES2026156_0_COA.pdf
- ES2026156_COC.pdf
- ES2027636_0_COA.pdf
- ES2027636_COC.pdf
- Forklift Pre Start Checklist, 12/09/22
- Fuelling Area Weekly Checks, 27/12/18, 12/2/19, 28/06/22, 09/09/22, 13/10/22, 28/10/22, 05/11/22
- GB Electrical Contractors Quotation – High bay lighting in Warehouse A and B, 19/10/16

- Greenice 2019, Independent Hazard Audit, Sandgate (NSW), Ammonium Nitrate Storage and Distribution Facility, Version 1, 11/09/19 (2019 HA)
- Groundwater monitoring.pdf
- <https://www.crawfordsfreightlines.com.au/contact/>
- <https://www.facebook.com/crawfordsfreightlines/>
- JJ's Waste & Recycling Waste Invoice dated 30/06/22
- JR Richards & Sons Waste Invoice dated 30/09/22
- K&S Recyclists Pty Ltd Invoice No. INV-0137 dated 03/08/22
- NSW EPA Online Waste Tracking CA no. 2C00188966 dated 02/09/22
- NSW EPA Online Waste Tracking CA no. 2C00188967 dated 02/09/22
- PROCIM Industrial Design, Certification of Structural Design – annually dated 12/12/18
- PROCIM Industrial Design, Certification of Structural Design – annually dated 25/11/19
- Ramboll Australia Pty Ltd. 2018 Independent Environmental Audit. Crawfords Ammonium Nitrate Facility, 29 August 2018 (2018 IEA).
- Ramboll Environ Australia Pty Ltd, IEA Crawfords Ammonium Nitrate Facility, Final, 09/09/15 (2015 IEA)
- Remittance Advice to City of Newcastle, July - August 2021
- Remittance Advice to Newcastle Golf Practice, September - December 2021; January, March, April, June, July 2022
- Roster Timesheet Comparison Report 20220801 - 20220831
- SafeWork NSW Transport Explosive Licence dated 07/11/21
- Sampling sheets.pdf
- Section 6 – Action Plan, Crawfords Response
- Sighted stormwater basin pump inspection/operation log dated 22/12/15 – 18/04/16
- Singleton Tyre & Battery Centre Waste Invoice dated 22/08/22
- Site Induction record
- Stock Count – July 2021
- Stock Count – June 2022
- Stock Count 06/09/18
- Stock Count 27/08/19
- Stock Count May 2022

4.2 Compliance Performance

The Auditors assessed the development to be compliant with Development Consent SSD 5119 and EPL 20295 except for the thirty-one non-compliances, of which twenty-seven have NC numbers to avoid duplication of findings and recommendations, as shown in Table 4. Refer to the Independent Audit Tables (**Appendix A**) for full details of the identified non-compliances and compliance status of other conditions. Section 5.1 provides twenty-three recommendations associated with the non-compliances, as a number of recommendations were consolidated and no recommendation was necessary for NC24.

Table 4: Summary of Non-compliances

NC#	Approval ID (Schedule, Condition)	Non-compliance
NC1 NC8 NC12 NC21	2, 1 3, 11 3, 22 3, 23 L1.1	Stormwater discharged from site continues to exceed stormwater quality assessment criteria indicating that the Water Management Plan, including the Stormwater Management Plan, require improvement. No analysis was completed for dissolved oxygen, chlorophyll, filterable reactive phosphate; and oxides of nitrogen which are listed in the Table 3.3.2 of the ANZECC Guidelines.
NC2	2, 2	Condition 2 is considered non-compliant based on the number of non-compliances with the conditions of this consent, including EPL 20295 requirements.
NC3	2, 4	Crawfords has not complied with the reasonable requirements of the Planning Secretary.
NC4	2, 6	No documentation has been provided to confirm written approval from the Department of the Off-Site Restricted Access Area Strategy.
NC5	2, 12 O2.1	Maintenance issues were observed related to bunds.

NC#	Approval ID (Schedule, Condition)	Non-compliance
NC5 NC15 NC21 to NC27	3, 1	The Auditors found nine non-compliances with EPL 20295. Refer to NC5, NC15 and NC21 to NC27 for details on the non-compliances.
NC6	3, 8	Hazard Audits have not been conducted at the required frequency of every two years.
NC7	3, 9	The SMS Manual does not include maps showing the risk contours for on-site and off-site risks, which is considered non-compliant.
NC9	3, 12	A number of IBCs were observed that were not banded. Pallet bands are used in the Shed D Workshop to store IBCs of oil and the concrete floor was stained black in places from spills around the pallet bands that had not been cleaned up properly.
NC10	3, 17	The Structural Certificates were not sighted within the Flood Risk Management and Response Plan and the OEMP.
NC11	3, 21	The Site Emergency Plan did not include a copy of the structural certification and a staff training program to be implemented. Evidence of consultation with Council and the OEH and approval by the Planning Secretary had not been provided for review by the Auditors for the revised Site Emergency Plan.
NC13	3, 25	The facility has operated outside of the approved operating hours.
NC14	3, 30	The results of the 2020 dust monitoring reported continued elevated deposited dust concentrations above the long term criteria throughout 2020 both on and off site.
NC15	3, 32 O3.1	Elevated levels of dust were observed during the site visit and elevated concentrations of deposited dust were identified through air quality monitoring.
NC16	3, 34	Elevated levels of dust observed during the site visit and elevated concentrations identified through air quality monitoring, both of which indicate that the Air Quality Management Plan has not been effective.
NC17	3, 36	The trains that visit the site may include up to 3 locomotives and 55 wagons, which exceeds the maximum allowed number of carriages.
NC18	4, 2	The OEMP was not revised following the 2018 IEA or following the direction of the Department in 2020.
NC19	4, 3	Exceedances of stormwater and dust criteria have occurred that have not been notified to DPE.
NC20	4, 4	Independent Environmental Audits have not been conducted at the required frequency of every three years.
NC22	O5.2	Pallet bands used to store IBCs and are not best practice for the permanent storage of IBCs and drums (e.g. waste oil in the Workshop in Shed D). There was evidence of spills outside pallet bands. The Quarantine Wastewater AST band appeared to be almost half full of water and therefore, may not have sufficient capacity in the event of a leak.
NC23	O7.2	Methyl Bromide cylinders was observed in the northern container storage area and it cannot be verified that methyl bromide was not in use during the Audit Period.
NC24	O7.3	Wood fumigation activities were carried out onsite up until 2020.
NC25	M4.2	Crawford's Incident and Compliance Action Tracker does not identify sections in the tracker where the time of a complaint, or the method by which the complaint was made could be populated if a complaint were to occur.
NC26	R1.5	The 2018/2019, 2019/2020 and 2020/2021 ARs were received by the EPA more than 60 days after the end of each reporting period.
NC27	U1.1	No documentation has been provided to confirm when paving works have been completed or the reports required to be supplied to the EPA of the description of the works completed.
Number of non-compliances identified:		31
Total number of compliance requirements:		134

4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

No Agency Notices, Orders, Penalty Notices or Prosecutions were issued in relation to the development during the Audit Period.

4.4 Previous Audit Recommendations

An assessment of progress on the recommendations made in the 2nd IEA is presented in Table 5.

Table 5: Status of Previous Audit Recommendations

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
Non-compliances		
2, 1; 2, 2	Review of the non-conformance with the implementation and maintenance of OEMP (and sub plans) outlined.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated no action had been undertaken. The OEMP and its sub-plans were not revised during the Audit Period. The Auditors found Schedule 2, Conditions 1 and 2 to be non-compliant.
2, 4	Review and act on requirements to implement audit and report actions outlined.	The 2018 IEA did not indicate whether the Director-General (now Planning Secretary) had made any reasonable requirements under Schedule 2, Condition 4 during the previous audit period, only that the site was non-compliant with a number of requirements of SSD-5119 and EPL 20295. Therefore, it is considered there was no required action. However, the Auditors note that Schedule 2, Condition 4 was found to be non-compliant in this Audit.
3, 3	Review the current ammonium stack separation distances and: - Identify if procedures can be revised so it can be stored as recommended by SAFEX International Good Practice Guide: Storage of Solid Technical Grade Ammonium Nitrate - If compliance with SAFEX cannot be achieved, undertake a risk assessment and discuss with the Department of the outcomes.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "Reviewed. Stack separation is compliant with AS4326. Safex separation is utilised when capacity is at a level which allows the greater separation of the Safex Good Practice Guide. CFL letter attached. Risk assessment of SSAN storage was conducted and submitted as part of CFL MHF Safety Case & Hazard Analysis for Storage of Ammonium Nitrate (July 2011) as part of our conditions of consent". The actions were reportedly completed in (and/or before) September 2018. The 2019 Hazard Audit observations were as follows: "During the site visit for the audit it was identified that AN stacks in Sheds A, B and C had separation distances that complied with both AS 4326 (3m) and SAFEX GPG 02 (9m). Crawfords are unable to fully comply with the 9m separation in the sheds, particularly when the sheds are close to the licenced capacity after import shipment are received. Crawfords have introduced a shed loading and unload protocol to maximise the separation between stacks in the store. - Compliance with the separation distances compliant with GPG 02 is subject to ongoing discussions between Crawfords and NSW Planning and Environment under the conditions of the Development Consent - No issues or concerns were observed or raised". The Auditors found that there was no evidence to indicate that Condition 3 had not been complied with during the Audit Period.
3, 9	The Construction Safety Study, the Final Hazard Analysis, Safety Management System and the Emergency Plan need to be submitted to Safework NSW with a request for written approval.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "All the relevant government agencies reviewed the documents applicable to their agency during the state significant development consent process. This includes SafeWork review of the construction safety study. Consent for the development was granted in June 2013 following agency approvals of documentation. In addition, Safework MHF reviewed and approved Final Hazard Analysis, Safety Management System and the Emergency Plan as part of the review for the MHF licencing process. (Licence #10292-01 granted 20/12/2016)". The Auditors have not verified the veracity of Crawfords statement, however, it is considered that revisions of the Construction Safety Study (no longer relevant), the Final Hazard Analysis, the Safety Management System and the Emergency Plan, as applicable, are not required to be submitted to SafeWork NSW under Schedule 3, Condition 9. Therefore, it is considered no further action is required.
3, 11	Review OEMP and refer to the recommendation for EPL 20295 Conditions L1.1 and U1.1.	Crawford's document 'Section 6 - Action Plan.docx' (undated) did not indicate the status for this recommendation. The OEMP was not reviewed or updated during the Audit Period.

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
		Refer to the status for EPL 20295 Conditions L1.1 and U1.1 below. However, the Auditors found Schedule 3, Condition 11 to be non-compliant during this Audit Period.
3, 12	Review the chemical storage areas within the Facility (particularly in Shed C and Shed D) and: - Confirm if the current storage is required. - If required, they need to be upgraded to comply with the Australian Standards, and/or EPA's Storing and Handling Liquids: Environmental Protection – Participants Handbook, by repairing the floor condition and installing bunding or portable bunds.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "<i>Reviewed October 2018. Chemical storage upgraded, and portable bunds installed. Storage in Shed C is currently subject to review with a view to upgrading the floor and electrical circuits for ammonium nitrate storage</i>". Storage of AN in Shed C ceased during this Audit Period and no AN was sighted in Shed C during the site visit. During this Audit Period, Sheds C and D remained unbunded. Various oils, waste oils and miscellaneous chemicals were stored in Shed D on pallet bunds with evidence of spills outside the pallet bunds. The concrete floor was stained black in places, with the potential for oil to infiltrate into the underlying soil. The Auditors found Schedule 3, Condition 12 to be non-compliant.
3, 14	Monitor the upgrades to paving of yard and trafficable areas according to agreed program. Review options for repair of Shed C floor. If not repaired, reduce dangerous goods storage in this shed.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "<i>Paving of yard (Stage 1) has been completed to plan. Stage 2 is in progress as per plan.</i>" In the previous audit period, a section adjacent to the rail corridor (a potential AN trafficable area) was unsealed. During the site visit, all storage and trafficable areas were inspected. The Auditors confirm that the majority of areas were satisfactorily sealed with a relatively impermeable material (concrete or bituminised sealant hardstand). As noted in the previous audits, the floor of Shed C required repair. During the site inspection, it was observed that the floor of Shed C had not been repaired. However, Shed C is no longer approved or used to store AN. The Auditors found Schedule 3, Condition 14 to be compliant.
3, 17	The 2018 Structural Certificate needs to be included in the Flood Risk Management and Response Plan and the OEMP	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "<i>The structural certificate is issued annually. A copy of the certificate will be appended to the site emergency response plan (flood risk section) and the OEMP at each annual issuance.</i>" During this Audit Period, the Auditors sighted the annual Structural Certificates prepared by Procim Industrial Design in 2018 and 2019 and Advitech in 2021. However the certificates were not sighted within the Flood Risk Management and Response Plan (or Site Emergency Response Plan) and the OEMP. The Auditors found Schedule 3, Condition 17 to be non-compliant.
3, 21	The 2018 version of the Flood Risk Management and Response Plan should be submitted to DPE.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "<i>Please refer site Emergency Response Plan (Attached). Please note the plan was under revision during October/November 2018 and approved on 28/11/18.</i>" During this Audit Period, the revised Site Emergency Plan was reviewed. The plan did not include a copy of the structural certification and a staff training program to be implemented. Evidence of consultation with Council and the OEH and approval by the Planning Secretary has not been provided for review by the Auditors. The Auditors found Schedule 3, Condition 21 to be non-compliant.
3, 22	The Water Management Plan should be reviewed to identify improvements that would contribute to improvements to water quality so as to comply with water quality criteria.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "<i>The water management plan and stormwater management plan are included in the OEMP. When Crawford's have received feedback and/or recommendations from the department arising from the IEA Action Plan, it is planned that the OEMP will be amended to reflect any recommendations including improvements to the water and stormwater management plans.</i>" Crawfords did not review and update the OEMP, including the Water Management Plan, during the Audit Period. A review of the discharge limits against the OEMP stormwater quality criteria showed elevated concentrations exceeding the adopted criteria. Based on the elevated concentrations the Auditors found Schedule 3, Condition 22 to be non-compliant.

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
3, 23	The Stormwater Management Plan should be reviewed to identify improvements that would contribute to improvements to water quality so as to comply with water quality criteria. The stormwater system inspections need to be undertaken as required by the Plan.	Crawford's reported status of actions for Schedule 3, Condition 23 was the same as for Schedule 3, Condition 2. During this Audit Period, the Auditors reviewed stormwater analysis completed for 2018 to 2022. Similar to the previous audit, exceedances of the OEMP stormwater quality 'ANZECC Levels' and 'Trigger Values' were observed for Total Nitrogen; Nitrate as N; and Ammonia as N. pH was also observed to be alkaline at times (>8.5 pH units). No analysis was completed for dissolved oxygen, chlorophyll, filterable reactive phosphate; and oxides of nitrogen which are listed in the Table 3.3.2 of the ANZECC Guidelines. The Auditors found Schedule 3, Condition 23 to be non-compliant.
3, 25	Review working hours in order to comply with the limits in the approval. Should activities need to be undertaken outside of these hours, Crawford's should prepare a modification application for DPE.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated "Review was conducted during October 2018 revealing no exceedances of hours relative to AN task. Samples of timesheets, along with the Table of Consents, were provided to the Department on 01/11/2018." The recommendation to prepare a modification application if activities need to be undertaken outside of approved hours was "noted, and not [considered] necessary during current and planned operations." During this Audit Period, Crawfords provided a selection of timesheet records for August 2022 which were reviewed by the Auditors. The earliest noted starting time was 5:30am, and the latest finishing time was 10:36pm. Therefore the facility has operated outside of the approved operating hours. The Auditors found Schedule 3, Condition 25 to be non-compliant.
3, 30	Review results of the air quality monitoring program at the dust deposition gauges: - To identify source(s) of exceedances (internal or external) - If sources are determined to be external, consider alternative gauge locations and submit request to DPE for approval.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated no action had been undertaken. During this Audit Period, air quality monitoring has continued to be measured at the site at the three existing DDGs. The air quality monitoring report for the year 2020 has been reviewed by the Auditors which measured depositional dust against the criteria in Table 5. The results of the 2020 monitoring reported continued elevated deposited dust concentrations above the annual average criterion throughout 2020 both on and off site. Whilst the monitoring results may not be indicative of deposited dust levels at any private residential receiver or 25% of privately owned land surrounding the site, based on the available information, the deposited dust levels are considered non-compliant with Schedule 3, Condition 30.
3, 32	The dust and odour mitigation measures included in the OEMP should also be reviewed as part of the review of the air monitoring program. Monitor the upgrades to paving of yard and trafficable areas according to agreed program.	Crawford's document 'Section 6 - Action Plan.docx' (undated) indicated no action had been undertaken. During this Audit Period, the Auditors observed the upgrades to paving of the yard and trafficable areas according to the agreed program. Crawfords advised that a review of the OEMP had yet to be undertaken. The Auditors found Schedule 3, Condition 32 to be non-compliant.
4, 2	The OEMP should be updated to reflect the current operations and management measures at the facility. Update the Environmental Monitoring Program as a separate standalone document. The current monitoring program is not clear to employees due to the size and complexity of the OEMP and additional monitoring requirements from the EPL. It should also be revised to reflect the changes to the groundwater and surface water monitoring program verbally agreed with the Department and the EPA in the meeting held 13 July 2018.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "When Crawford's have received feedback and/or recommendations from the department arising from the IEA Action Plan, it is planned that the OEMP will be amended to reflect any recommendations including improvements to the water and stormwater management plans." Crawfords also indicated in relation to the EMP that "Complete. EMP (OEMP) Table attached". Crawfords did not review and update the OEMP during the Audit Period. The Auditors were not provided with the EMP as a separate document. The Auditors found Schedule 4, Condition 2 to be non-compliant on the basis that the OEMP was not revised following the 2018 IEA or following the direction of the Department in 2020.
4, 3	Crawford's should ensure that any exceedance associated with any condition in the approval is	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Noted. Monitored by safety and compliance section to ensure compliance."

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
	immediately reported to DPE and other relevant agencies, with a written report on the incident submitted within seven days.	However, Crawfords did not notify DPE of the exceedances of the stormwater or dust criteria during the Audit Period. Therefore, Schedule 4, Condition 3 is considered non-compliant.
Opportunities for Improvement		
2, 5	The two-year extension to the Deed of Agreement with Newcastle City Council expired on 19 July 2017. A written request for confirmation from Council of further extension to the agreement (or similar) should be submitted.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "A letter to Newcastle City Council is in draft and pending approval by Crawford's Director". No documentation has been provided to confirm that a written request for confirmation from Council of further extension has been submitted.
3, 5	Emergency Plan which was updated in Jan 2018 should be submitted to DPE.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Please refer site Emergency Response Plan (Attached) Please note the plan was under revision during October/November 2018 and approved on 28/11/18." The Site Emergency Plan was last updated on 3 May 2022.
3, 12 (and EPL 05.2)	Update the procedure for diesel refuelling to avoid diesel spills outside of the bunded areas	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Procedure reviewed. Inspection of fuel point included in weekly maintenance schedule." **Note: A checklist has now been developed to encapsulate all items to be inspected – Bund, sumps, spill bucket, spill kits, waste bins, litter etc.** Samples of the 'Fuelling Area Weekly Checks' records were reviewed. No evidence of spills outside the bund was observed at the diesel AST fuelling area.
Environment Protection Licence		
Non-compliances		
A1.2	Verify the types and quantities of chemical substances stored onsite if classified as Dangerous Goods. Maintain documentation of the inventory substances stored to ensure that no more than 13,500 T dangerous goods (including AN) are stored onsite.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "The dangerous goods manifest has been checked and is current and correct and complies with Schedule 11 of the WHS Reg (NSW) 2017." Stock counts of dangerous goods other than AN were not readily available. Based on the site visit and discussion with facility personnel, the Auditors were satisfied that the storage limit for dangerous goods, including AN, was unlikely to have been exceeded during the Audit Period. The Auditors have no reason to believe that Crawfords have not complied with Condition A1.2 during the Audit period.
L1.1, U1.1	Review surface water monitoring trends after the yard paving upgrades.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Ongoing – monitored every month subject to rainfall." Crawfords have advised all paving works to have been completed with the area surrounding Shed C finished earlier in the year (Phase 3). A review has yet to be undertaken of the surface water monitoring trends. Both Conditions L1.1. and U1.1 were found to be non-compliant.
L2.1, O6.1	Verify waste classification of spent alumina and other smelter by-products stored onsite from the Tomago smelter.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Complete: Refer attached documents from supplier/customer and safety data sheet." Crawfords have advised that spent alumina is no longer stored onsite.
O1.1, O6.1	Verify complete waste disposal receipts for waste oil collection and AN packaging. Verify the waste is taken offsite by licensed contractors.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "Complete: Disposal receipts have been forwarded to Ramboll post-audit on 27/07/2018." Waste oil is collected and disposed of by a licensed contractor (JJ's Waste & Recycling Pty Ltd). Waste disposal receipts were sighted by the Auditors. AN packaging (i.e. bags) is taken offsite separately and disposed of by K&S Recyclists Pty Ltd. Waste disposal documentation was sighted by the Auditors.
O3.1, U1.1	Review yard paving upgrade program to confirm meeting first schedule.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "First stage of revised schedule was

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
		<i>finished ahead of time and EPA were advised on 19/09/2018. Stage 2 has been partially commenced. And is on track to meet completion date."</i> Crawfords have advised all paving works to have been completed with the area surrounding Shed C finished earlier in the year (Phase 3). No documentation has been provided to confirm when paving works were completed or the reports required to be supplied to the EPA of the description of the works completed.
03.2, U1.1	Improve measures for containing wood fibres where high wood transport activities within the yard area occur.	Wood operations ceased onsite in 2020.
Opportunities for Improvement		
U3.1	Maintain water to the bio retention basins for the Vetiver grass.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "<i>Complete: Water tanker has been, and continues to be, utilised to water vetiver grass during the current dry period</i>". Condition U3.1 has been removed from the current EPL 20295. The Auditors observed that the Vetiver grass was abundant in the bio retention basins. Crawfords advised the bio-retention basins were in the process of being relined.
-	Prepare a groundwater investigation program as noted in Section 5 of [the 2018 IEA] report.	Crawfords' document 'Section 6 - Action Plan.docx' (undated) indicated "<i>Crawford's met with [DPE] and EPA on 13th July 2018 to discuss stormwater and ground water analysis. At the meeting it was agreed Crawford's could remove the following analytes [sic] from the groundwater monitoring</i> • Arsenic • Cadmium • Copper • pH • PAH [Polycyclic Aromatic Hydrocarbons] • Zinc <i>and analyse ammonia and nitrogen only.</i> <i>It was also agreed monitoring well #1 would be removed from the groundwater monitoring.</i> <i>As with previous items, when Crawford's have received feedback and/or recommendations from the department arising from the IEA Action Plan, it is planned that the OEMP will be amended to reflect the above, and an application for variation to the EPL will be submitted to the EPA."</i> Based on EPL 20295, the groundwater monitoring data and Annual Returns for the Audit Period, EPL 20295 and the groundwater monitoring program did not change. The Auditors observe that the groundwater monitoring data was provided in the form of Annual Returns, some tabulated data, accompanied by selected field sampling sheets prepared by Crawfords environmental consultant, ERM, chains of custody prepared by ERM and Australian Laboratory Services (ALS) Certificates of Analysis. The Auditors understand that Crawfords environmental consultant provides water monitoring results but does not prepare water monitoring reports. Therefore, it is difficult to assess the validity of the monitoring data for the Audit Period or compare the results with baseline data, previous monitoring rounds or the assessment criteria and trigger levels. No graphs are available to assess contaminant concentrations over time for trends in the data. Analysis of the results and comparison of groundwater and stormwater monitoring results may assist with understanding if there is interaction between groundwater and stormwater in the bio retention basins, which we understand is suspected. Collectively, the records provided for review are considered to generally meet the EPA's Approved methods for the sampling and analysis of water pollutants in NSW (EPA, 2022) required under Condition M3.1. However, it is also good practice for monitoring reports to be prepared generally in accordance with the EPA's requirements. <i>Consultants Reporting on Contaminated Sites,</i>

Approval ID (Schedule, Condition)	2018 IEA Recommendation	Action Status
Development Consent		
		<i>Contaminated Site Guidelines</i> (EPA, 2020). for ongoing monitoring reports, as relevant (refer below for excerpt from the EPA guideline). "An ongoing monitoring report must include the following: • A concise background, including conceptual site model and reference (where applicable) to other reports with more detailed information. • Justification of any departures from the required monitoring plan. • Clear presentation and discussion of results. • Comparison with previous monitoring rounds (and statistical analysis where sufficient data has been collected) if appropriate). • Comparison to site-specific criteria which might trigger the need for extra work/remediation, or to notify the EPA, or lead to pre-defined outcomes. • Contingency actions to be undertaken or required in response to monitoring results, and by whom. The Auditors recommend as an opportunity for improvement that Crawfords obtain monitoring reports for required water monitoring that generally meet the EPA guidelines.

4.5 EMP, Sub-plans and Post Approval Documents

Revision of the OEMP was not completed during the Audit Period. Crawfords advised that the OEMP was in the process of being revised in response to DPE's directions. A draft OEMP was not provided to the Auditors for review. No other management plans or sub-plans were revised during the Audit Period, except for the Site Emergency Plan and Pollution Incident Response Management Plan.

Condition 2, Schedule 4 is considered non-compliant on the basis that the OEMP was not revised following the 2018 IEA or following the direction of the Department in 2020. A number of sub-plans require review including, but not limited to, the Water Management Plan, Stormwater Management Plan and Air Quality Management Plan.

4.6 EMS

There is no project specific Environmental Management System (EMS) for the project. The Auditors consider the various management plans noted in Section 4.5 to be generally appropriate for managing environmental matters pending the required revisions.

4.7 Environmental Performance

The site has ongoing issues with stormwater emissions that exceed stormwater assessment criteria and dust emissions that exceed long term criteria for deposited dust. Storage of oils and other chemicals in the Shed D Workshop was not considered adequate with the potential for oil to infiltrate into the underlying soil. Hence, based on available evidence, environmental performance of the development should be improved.

4.8 Complaints

The site has a 'Safe Driving Contact' telephone line, and other telephone numbers for contacting Crawfords on their website and/or Facebook page. The site maintains an incident and non-conformance register where complaints are registered. Facility personnel advised that the complaints they receive mainly relate to vehicles issues off site. Based on the incident and non-conformance register and the completed Annual Returns, there have been no complaints related to site operations and the premises licenced under EPL 20295.

4.9 Incidents

The site maintains an incident and non-conformance register where incidents are recorded. Facility personnel advised that no environmental incidents have occurred during the Audit Period. However, exceedances of assessment criteria for stormwater and dust emissions have not been notified to the Department.

4.10 Actual Verses Predicted Environmental Impacts

The Auditors have not identified inconsistencies between actual environmental impacts and the predicted environmental impacts.

4.11 Site Inspection

The Auditors carried out a site inspection on 12 September 2022 accompanied by project personnel referred to in Section 3.4. Photographs taken during the site visit are provided in **Appendix D**.

4.12 Improvement Opportunities

The following opportunities for improvement have also been identified in Table 6. Refer to Section 5.2 for recommended actions. Refer to the Independent Audit Table (**Appendix A**) for full details.

Table 6: Opportunities for Improvement

Condition	Opportunity for Improvement
3, 3	Painted lines were faded in places. The stock count total number of bags and tonnages is not transferred or recorded in a summary spreadsheet and therefore the quantity of AN onsite cannot be readily determined or tracked without reviewing individual daily stock count worksheets.
3, 5	The Site Emergency Plan and PIRMP are not being tested in the field sufficiently and records detailing the nature of the exercise/test, attendance record and required improvements were not available for review.
3, 20	Given recent major flooding in NSW, most likely due to climate change impacts, a review of flood emergency response equipment is warranted.
3, 31	During the site visit, the Auditors observed some forklifts that appeared to be driving at speed potentially higher than the 10 km/h speed limit, however, this could not be verified.
3, 38	The Traffic Management Map is out of date as it still indicates that the northern end of the site is used for "Timber Parking", which reportedly ceased in 2020.
3, 39	Collectively, it is considered that the 2013 TMP, 2013 OEMP and SMS Manual generally meet the requirements of Condition 39 but the Auditors were unable to verify that a program to monitor the effectiveness of the measures is being implemented.
3, 48	Energy and water efficiency are not regularly reviewed.
L2.2	A number of old transformers were observed stored onsite, which were reportedly not 'waste' but in transit to a client. Temporary storage of equipment that could be considered as waste may be potentially non-compliant and should be reviewed.
O3.2	The site inspection identified the emissions of dust in areas where the surface was unsealed within the yard north of Shed C and south of Shed D. The site operations appear to be undertaking activities generally in accordance with the OEMP however dust is continuing to be emitted.
M5.2	Telephone numbers for contacting Crawfords are provided on their website and their Facebook page but they are not advertised as a telephone complaints line with the possible exception of a 'Safe Driving Contact' telephone number, which is not directly related to the premises. No signage was observed advertising a telephone complaints line for Crawfords at the entrance to the site.
-	The Auditors understand that Crawfords environmental consultant provides water monitoring results but does not prepare water monitoring reports. Therefore, it is difficult to assess the validity of the monitoring data for the Audit Period or compare the results with baseline data, previous monitoring rounds or the assessment criteria and trigger levels. No graphs are available to assess contaminant concentrations over time for trends in the data. Analysis of the results and comparison of groundwater and stormwater monitoring results may assist with understanding if there is interaction between groundwater and stormwater in the bio retention basins, which we understand is suspected.

4.13 Key Strengths

The storage of AN in Sheds A and B appeared to be managed adequately with good housekeeping and stock count tracking. There appeared to be no community complaints except in relation to trucks off-site. However, there are a number of non-compliances that require corrective action. Recommendations have been made in Section 5 to improve management systems and environmental performance.

5. RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT

5.1 Recommendations in Relation to Non-compliances

- NC1, Schedule 2, Condition 1; NC8, Schedule 3, Condition 11; NC12, Schedule 3, Conditions 22 & 23, NC21, L1.1 – Review the Water Management Plan, including the Stormwater Management Plan, to identify improvements that would contribute to improving water quality so as to comply with water quality assessment criteria. Identified improvement actions, such as the work underway to improve the stormwater retention ponds, should be documented in the Water Management Plan. Include groundwater quality assessment criteria in the Water Management Plan.
- NC2, Schedule 2, Condition 2 – Review the findings of this Audit and consider developing a compliance tracking system that can be reviewed on a regular basis to prevent future non-compliances.
- NC3, Schedule 2, Condition 4 – Ensure that directions and requests from the Department are complied with in accordance with Condition 4 requirements.
- NC4, Schedule 2, Condition 6 – Obtain the written approval of the Planning Secretary every 12 months from the date the Department approved the Off-Site Restricted Access Area Strategy and retain the records on file.
- NC5, Schedule 2, Condition 12 – Inspect and maintain controls measures such as bunds to ensure sufficient capacity to contain spills. Clean up spills to prevent potential contamination of soil and groundwater.
- NC6, Schedule 3, Condition 8 – Establish a process to ensure that Hazard Audits are conducted every two years or at such intervals as the Planning Secretary may agree. Retain records related to the conduct of Hazard Audits including the approval of the Auditor / Audit Team, the submission of the HA report to DPE and Planning Secretary's approval.
- NC7, Schedule 3, Condition 9 – Ensure that the SMS Manual includes maps showing the risk contours for on-site and off-site risks.
- NC9, Schedule 3, Condition 12 – Conduct a review of the house keeping practices, monitoring and maintenance of chemical storage within Shed C and D, including the adequacy of bunding in the Workshop. It is also recommended that a review of chemical labelling be undertaken.
- NC10, Schedule 3, Condition 17 – Implement a procedure to ensure the structural certification documents are included as an appendix to the site emergency response plan and OEMP.
- NC11, Schedule 3, Condition 21 – A review of the current Site Emergency Plan should be undertaken in consultation with Council and the OEH and approved by the Planning Secretary. A procedure should also be implemented to ensure the structural certificates are attached to the plan.
- NC13, Schedule 3, Condition 25 – Ensure that the approved hours of operation are complied with, as shown in Condition 25 or as otherwise agreed in writing by the Planning Secretary.
- NC14, Schedule 3, Conditions 30 – Review the air quality monitoring program to assess whether deposited dust monitoring at additional offsite locations would provide a more accurate determination of whether deposited dust levels at any private residential receiver or 25% of privately owned land surrounding the site are in fact being exceeded. Evaluate current dust mitigation measures as part of the revision of the OEMP.
- NC15, Schedule 3, Condition 32; Condition O3.1 – Review and improve dust mitigation measures to minimise dust emissions from operation of the development.

- NC16, Schedule 3, Condition 34 – Review and revise the Air Quality Management Plan to incorporate improved dust mitigation measures.
- NC17, Schedule 3, Condition 36 – Review train movements to ensure that Condition 36 requirements are met or alternatively, seek DPE approval to vary Condition 36.
- NC18, Schedule 4, Condition 2 – Review and revise the OEMP to address recommendations of this Audit, as well as any outstanding recommendations from the 2018 IEA and the Department's directions. Submit the revised OEMP to DPE for approval.
- NC19, Schedule 4, Condition 3 – In addition to incidents, ensure that an exceedance of a limit / performance criterion in this consent is notified to DPE and other relevant agencies of the exceedance immediately (or as soon as practical thereafter). Submit a written detailed report within 7 days of the exceedance (or incident).
- NC20, Schedule 4, Condition 4 – Ensure that future IEAs are conducted every 3 years. The next IEA site visit should be conducted by 27/05/24 or as otherwise agreed with DPE.
- NC22, Condition O5.2 – Ensure that bunds are inspected and maintained in order that the bunds has sufficient capacity in accordance with Condition O5.2 requirements. Consider installing a properly constructed bund(s) in the Workshop and elsewhere as considered necessary that meets the requirements of Condition O5.2.
- NC23, Condition O7.2 – Remove the methyl bromide cylinders from the site. Ensure that methyl bromide is not used for any purpose at the site.
- NC25, Condition M4.2 – Review and update the Incident Register & Compliance Action Tracker to include the required details in accordance with Condition M4.2.
- NC26, Condition R1.5 – Review the process for preparing and submitting Annual Returns to ensure that they are submitted within the 60-day timeframe.
- NC27, Condition U1.1 – If not already completed, reports of the paving works and reports to be submitted to the EPA.

5.2 Recommendations in Relation to Opportunities for Improvement

- Schedule 3, Condition 3 – Refresh the painted lines in Sheds A and B so that the bulka-bags are kept within the required areas. Review the AN stock count system and consider adding a monthly summary worksheet and graph that tallies the total number of bags and tonnages in each Shed. The monthly tally can then be consolidated in an annual or ongoing spreadsheet that tracks the quantities over time.
- Schedule 3, Condition 5 – Ensure that records of testing of the Site Emergency Plan and PIRMP, which detail the nature of the exercise/test, attendance record and required improvements, are retained and readily available for review on request. Ensure that other monitoring requirements are being carried out and records retained in accordance with the Site Emergency Plan, PIRMP. OEMP and SMS Manual and Condition 5 requirements.
- Schedule 3, Condition 20 – If it has not already been done, review the flood emergency response equipment as part of the OEMP review.
- Schedule 3, Condition 31 – Review forklift driving procedures and training to confirm all site personnel understand the speed limit at the site.
- Schedule 3, Condition 38 – Attach the current Site Map to the Crawfords Site Induction.
- Schedule 3, Condition 39 – Ensure that records are retained to demonstrate that a program to monitor the effectiveness of the TMP measures is being implemented as detailed in the 2013 TMP, 2013 OEMP and SMS Manual.
- Schedule 3, Condition 48 – Review and revise the OEMP to include water efficiency measures and a process to regularly review opportunities to implement further energy and water efficiency measures, that is recorded.

- Condition L2.2 – Review internal procedures regarding the transfer and temporary storage of equipment onsite to ensure that 'waste' materials are not received at site.
- Condition O3.2 - A review of the dust and odour mitigation measures to be undertaken as part of the OEMP review.
- Condition M5.2 – Notify the public of the telephone number that can be used to make a complaint, not necessarily related to safe driving issues. Erect a sign at the site entrance notifying the public of a telephone number for community complaints in relation to site activities or vehicle and mobile plant activities.
- Water monitoring – Obtain monitoring reports for required water monitoring prepared generally in accordance with the EPA's guidelines.

6. CONCLUSIONS

The Auditors considered the storage of AN in Sheds A and B to be managed adequately with good housekeeping and stock count tracking. There appeared to be no notifiable incidents or community complaints except in relation to trucks off-site. However, exceedances of stormwater assessment criteria and long term criteria for deposited dust have not been notified to the Department.

The Auditors assessed the development to be compliant with SSD 5119 and EPL 20295 except for thirty-one non-compliances. Twenty-three recommendations have been made in relation to the non-compliances, as well as eleven in relation to opportunities for improvement.

APPENDIX A INDEPENDENT AUDIT TABLE

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
Schedule 2					
1	The Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction and/or operation of the development.	Ramboll Australia Pty Ltd (Ramboll), 2018 Independent Environmental Audit, Crawfords Ammonium Nitrate Facility, Final, 29/08/18 (2018 IEA)	Review of site documentation; observations and interviews with facility personnel indicate that there have not been any notifiable pollution incidents arising from site operations. However, the Auditors have found that stormwater discharged from site continues to exceed stormwater quality assessment criteria indicating that the Water Management Plan, including the Stormwater Management Plan, require improvement. Therefore, Condition 1 is considered non-compliant. Recommendation: Refer to the recommendations for Conditions 22 and 23.	Non-compliant	NC1
2	The Applicant shall carry out the development generally in accordance with the: (a) EIS; (b) RTS; (c) Management and Mitigation Measures (see Appendix A); (d) Site Plans (Appendix B) and Drawings in the EIS; and (e) conditions of this consent.	2018 IEA	The development is being carried out generally in accordance with the requirements of SSD-5119, with the exception of thirty one (31) non-compliances with consent conditions, including 9 with EPL 20295 conditions under Schedule 3, Condition 1, as outlined in this table. However, only twenty-seven of these non-compliances have a non-compliance (NC) number due to duplication of the findings and recommendations. Given the number of	Non-compliant	NC2

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			non-compliances, the Auditors consider that Condition 2 is non-compliant. Recommendation: Review the findings of this Audit and consider developing a compliance tracking system that can be reviewed on a regular basis to prevent future non-compliances.		
3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.		The Auditors are not aware of any inconsistencies.	Not triggered	
4	The Applicant shall comply with any reasonable requirement/s of the Director-General arising from the Department's assessment of: (a) any audits, reports, plans, programs, strategies, studies or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained in these audits, reports, plans, programs, strategies, studies or correspondence submitted by the Applicant.	- DPE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility, Sandgate (SSD-5119) – Site Inspection Follow Up, 08/08/22, with attached: - DPIE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility (SSD 5119) Secretary Directions, 18/12/20 - DPE email to Crawfords, Crawfords Ammonium	The Department of Planning, Infrastructure & Environment (DPIE, which is now DPE) issued Secretary Directions to Crawfords in December 2020 to: "re-engage the Hazard Auditor to revise the HA report to provide further information"; "revise the Response to Auditor Recommendations (RAR) [for the Hazard Audit (HA)] to provide a timeline for the completing all 2019 HA recommendations"; and "update the Operational Environmental Management Plan (OEMP) and submit the updated	Non-compliant	NC3

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
		Nitrate Storage and Distribution Facility, Sandgate (SSD 5119), Proposed 2022 IEA Audit Team, 31/08/22 • Crawfords email to DPE, Independent Hazard Audit – Sandgate, 02/09/22 • DPE letter to Greenice Pty Ltd (Greenice), Crawfords Freightlines, Sandgate (SSD 5119) – 2022 Hazard Auditor Approval, 02/09/22 • Interview with Crawfords on 12/09/22 • Site visit on 12/09/22	<i>OEMP to the Planning Secretary for approval via the Major Projects Portal by 4pm 5 February 2021, or as otherwise agreed prior to this date with the Planning Secretary".</i> The DPE email dated 08/08/22 indicated that Crawfords had not provided an updated 2019 Hazard Audit and the OEMP had not been updated. Hence, the Applicant had not complied with the reasonable requirements of the Planning Secretary. The DPE email dated 08/08/22 also made a number of requests under Schedule 2, Condition 4 as follows. • Submit proposed audit teams for the HA and IEA to DPE by 29/08/22, and that the HA address previous hazard auditor comments and follow-up actions and the Secretary's directions dated 18/12/20. Crawfords submitted proposed audit teams for the HA and IEA to DPE by 17/08/22, if not before, which met the requirement. • Update the OEMP by 14/10/22, or as otherwise agreed by the Planning Secretary. The updated OEMP is required to <i>"clearly define, with supporting reasoning, the short period of time that may be</i>		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			necessary to breach the 9 metre separation distance stipulated by the SAFEX guideline and in what circumstances this may apply. The OEMP shall also address all previous points summarised in correspondence from the department dated 18 December 2020". The Auditors have not been provided with a revised OEMP. • Store the AN stacks "with a separation distance of 9 metre or greater, in accordance with the SAFEX guideline, except for a short period of time when the building stoage is at maximum capacity". The Auditors observed that the separation distance between stacks in Sheds A and B was approximately 9 m. Also refer to findings for Schedule 3, Condition 3. • Regularly sweep the site with a street sweeper and handle and store all products in a manner to minimise dust generation on site. The Auditors observed a water cart operating for dust suppression purposes although forklift movements were generating some dust.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Ensure all AN product is removed and cleaned up immediately after the debagging process. The Auditors observed facility personnel sweeping up AN beads in Shed A. The area around the AN debagging process area appeared generally tidy. Recommendation: Ensure that directions and requests from the Department are complied with in accordance with Condition 4 requirements.		
5	Prior to the commencement of the Operation, the Applicant must, to the satisfaction of the Director-General, demonstrate that suitable arrangements are in place to prohibit public access to the Off-Site Restricted Access Area as labelled and illustrated in Appendix D of this consent. As part of demonstrating the suitable arrangements for the Off-Site Restricted Access Area are in place, the Applicant must prepare and implement an Off-Site Restricted Access Area Strategy. This Strategy must be approved by the Director-General prior to the commencement of the Operation and shall:	- Ramboll Environ Australia Pty Ltd (Ramboll Environ), IEA Crawfords Ammonium Nitrate Facility, Final, 09/09/15 (2015 IEA) - Remittance Advice to Newcastle Golf Practice, September - December 2021; January, March, April, June, July 2022 - Remittance Advice to City of Newcastle, July - August 2021	The Off-Site Restricted Area Access Strategy has been previously assessed as compliant during the previous audit period. The Auditors sighted remittance advices to Newcastle City Council and the Newcastle Golf Practice Centre for lease payments by Crawfords in accordance with the Off-Site Restricted Area Access Strategy.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	- provide details of the works proposed to prohibit public access, such as secure fencing and signage; - provide evidence that each landowner within the Off-Site Restricted Access Area has been consulted and agrees with the proposed measures, including Council and the lessee of Part Lot 33 DP 1118637 (i.e. the Sandgate Golf Practice Centre or its successors); and investigate and detail options to purchase or secure land on a long-term basis within the Off-Site Restricted Access Area in perpetuity.				
6	The Applicant must also obtain the written approval of the Director-General of the Off-Site Restricted Access Area Strategy referred to in Condition 5 above: (a) every 12 months from the Director-General's approval of Condition 5 above (i.e. the yearly anniversary); and (b) at any time any arrangement established under Condition 5 above changes or is modified.	Interview with Crawfords on 12/09/22	Crawfords advised the Auditors that it annually provided the Department with copies of receipts for payments to Newcastle City Council and the Newcastle Golf Practice Centre. No documentation has been provided to confirm written approval from the Department. Recommendation: Obtain the written approval of the Planning Secretary every 12 months from the date the Department approved	Non-compliant	NC4

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			the Off-Site Restricted Access Area Strategy and retain the records on file.		
7	In any case, the Applicant shall not store more than 13,500 tonnes of AN on the site at any one time, comprising the storage of a maximum of up to: 4,500 tonnes of AN in Shed A; 4,500 tonnes of AN in Shed B; 4,000 tonnes of AN in Shed C; and 500 tonnes of AN in shipping containers in the outdoor compound of Shed C.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Stock Count – June 2022 • Stock Count – July 2021 • Stock Count May 2022 • Stock Count 06/09/18 • Stock Count 27/08/19 • SafeWork NSW Transport Explosive Licence dated 07/11/21	The site reported that AN does not exceed the maximum quantities listed in Condition 7. The Auditors viewed a selected sample of daily manifests (September 2018, August 2019, July 2021, May 2022 and June 2022). All storage quantities were below the individual maximum tonnage for Sheds A and B. AN is reportedly not currently stored in Shed C or in shipping containers outside Shed C. The Auditors did not observe any evidence that Shed C had recently been used for AN storage. Under the SafeWork NSW Licence to Transport (with an expiry date of 26 May 2026), Crawfords is only permitted to store AN in Sheds A and B.	Compliant	
8	This consent will lapse five (5) years from the date of consent unless the works associated with the development have physically commenced.		The developed of the site has physically commenced and is operational.	Not triggered	
9	With the approval of the Director-General, the Applicant may: (a) submit any management plan or monitoring program required by this consent on a progressive basis; and			Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(b) combine any management plan or program required by this consent with any similar management plan or program that have been approved under previous consents or approvals.				
10	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, on the site are constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i> <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.</i>	AN Load out – Layout plans.pdf, Allshelter, Shelter Assembly, Shelter Code: CATA1412A, Pages 1 to 4 of 16, 04/05/19	A Shelter was installed during the Audit Period for the AN load out area. Shelter Assembly plans were provided for the shelter. The Auditors have not sighted compliance certification for the Shelter. However, the Auditors have no reason the believe that Shelter does not meet relevant requirements of the BCA.	Compliant	
11	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	- Interview with Crawfords on 12/09/22 - Site visit on 12/09/22	Crawfords have advised there have been no damages to public infrastructure. The Auditors did not observe any damages during this Audit Period.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
12	The Applicant shall ensure that all plant and equipment used for the development is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Employee Details – Current Certification records • Forklift Pre Start Checklist, 12/09/22 • Fuelling Area Weekly Checks, 27/12/18, 12/2/19, 28/06/22, 09/09/22, 13/10/22, 28/10/22, 05/11/22 • Crawfords, Incident Register & Compliance Action Tracker(AutoRecovered).xlsx	A selection of maintenance records was provided including forklift pre-start checklists, fuelling area weekly checks and truck audits. However, a number of maintenance issues were observed during the site visit as follows: • At least one of the concrete bunds for the diesel fuel points along the railway siding was cracked in one corner and may not contain a leak or spill. • Absorbent material had been applied to soak up leaks or spills of oil and grease in the workshop side of Shed D around bunded chemical storages but had not been cleaned up. Black staining of the concrete floor was evident. • The bund for the aboveground storage tank for wash bay wastewater appeared to be half full of water, reducing the capacity of the bund. Condition 12 is considered non-compliant on the basis of the observed maintenance issues. Training records were sighted for two Crawfords employees working at Sandgate indicating that 'Recurring' licence and training requirements were	Non-compliant	NC5

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			generally up to date including, for example, 'DG Licence', 'Drivers Licence', 'Forklift Licence' and relevant procedures, e.g. R001 (SOP26, 27 & 28) Sandgate Train Loading and Unloading; SOP DG 020 – AN Bags to Bulk – Loading Bulk Tippers outside AN Stores. Non-Recurring training included: CFL 004 (SOP 51) – Traffic Management Plan – Sandgate; SWI 012 Water Cart Operating Instructions; SWI 062 Refuelling Locomotives at Sandgate Intermodal Terminal. Recommendation: Inspect and maintain controls measures such as bunds to ensure sufficient capacity to contain spills. Clean up spills to prevent potential contamination of soil and groundwater.		
13	With the approval of the Director-General, the Applicant may submit any plan or program required under this consent on a progressive basis.			Not triggered	
14	Prior to the commencement of operation, the Applicant shall pay to Council a development contribution to a maximum amount of \$6,000 determined in accordance with Council's Section 94A Development Contributions Plan 2009, updated 22	2015 IEA	This Condition has been assessed during the previous audit period.	Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	April 2013, in consultation with Council, and to the satisfaction of the Director-General. <i>Note: The amount of contribution payable under this condition has been calculated on the basis of the current rate as at the date of consent and is based on the most recent quarterly Consumer Price Index (CPI) release made available by the Australian Bureau of Statistics (ABS). The CPI index rate is expected to rise at regular intervals and therefore the actual contribution payable is indexed and should be recalculated at the CPI rate applicable on the day of payment.</i>				
Schedule 3					
1	The Applicant shall comply with the requirements of the EPA set out in any EPL issued for the development.		The Auditors found nine (9) non-compliances with the requirements of EPL 20295, although only seven have NC numbers due to duplication of the finding with other conditions. Refer to the findings and recommendations for EPL 20295 compliance in Table B.	Non-compliant	Refer to NC21 to NC27
Hazards and Risks					
2	The Applicant shall ensure that the development complies with the requirements of the latest version of AS 4326. Measures to inspect and maintain the site to ensure compliance with the latest version of AS 4326	Greenice, Independent Hazard Audit, Sandgate (NSW), Ammonium Nitrate Storage and Distribution Facility, Version 1, 11/09/19 (2019 HA)	The Hazard Auditor found in 2019 that the development generally complied with the version of AS 4326 that was current at that time.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	must be documented in Operational Environmental Management Plan for the development (see Condition 2 in Schedule 4 of this consent).	ERM, Ammonium Nitrate Storage and Distribution Facility, Operational Environmental Management Plan, 07/08/13 (2013 OEMP)	The 2013 OEMP describes storage arrangements and other requirements to comply with AS 4326.		
3	The Applicant shall maintain the appropriate ammonium stack separation distance, as recommended by SAFEX <i>International Good Practice Guide: Storage of Solid Technical Grade Ammonium Nitrate</i> or better, to prevent involvement of more than half the storage capacity of each storage building in an explosion, except for a short period of time when the storage is at maximum capacity.	2019 HA - Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	The 2019 HA Auditor found that during the site visit the stack separation distance complied with the SAFEX requirement of 9 m separation. However, he also found that "<i>Crawfords are unable to fully comply with the 9m separation in the sheds, particularly when the sheds are close to the licenced capacity after import shipment are received. Crawfords have introduced a shed loading and unload protocol to maximise the separation between stacks in the store</i>". The Auditors observed during the site visit that the AN in Sheds A and B were stored within the painted lines on the floor that delineate the areas where the AN bulka-bags are stacked. The distance between the delineated stacks was paced out to be approximately 9 m. The separation of stacks appeared to be consistent throughout Sheds A and B. Shed B appeared to be full at the time	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			but Shed A had space not occupied by AN. Facility personnel advised that when the sheds are at their maximum capacity for short periods of time that the AN bulka-bags may be in an aisle down the middle of the 9 m separation area. However, this measure was not occurring or observed during the site visit by the Auditors. Samples of the AN monthly stock counts for Sheds A and B, which are conducted generally on a daily basis, were provided to the Auditors. It provides a visual snapshot of the number of AN bulka bags in each stack and a total number of bags and total tonnage of AN onsite. Whilst bags are stored within the 9 m separation zones intermittently and usually only in one or two areas, it does not appear to be a regular occurrence. It was observed that the painted lines were faded in places. The stock count total number of bags and tonnages is not transferred or recorded in a summary spreadsheet and therefore the quantity of AN onsite		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			cannot be readily determined or tracked without reviewing individual daily stock count worksheets. A summary spreadsheet and graph that tracks the total number of bags and tonnages in Shed A and Shed B over time would assist in tracking the overall quantity of AN stored onsite and any trends in the data over time. It may provide DPE with more confidence that SAFEX requirements, as well as limits of consent, are being adhered to. The Auditors have no evidence to indicate that Condition 3 is not being complied with. Recommendation: Refresh the painted lines so that the bulka-bags are kept within the required areas. Review the AN stock count system and consider adding a monthly summary worksheet and graph that tallies the total number of bags and tonnages in each Shed. The monthly tally can then be consolidated in an annual or ongoing spreadsheet that tracks the quantities over time.		
4	At least one month prior to the commencement of construction of the			Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	proposed project (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Director-General may agree, the Applicant shall prepare and submit for the approval of the Director-General the studies set out under subsections (a) to (c) (the pre-construction studies) of this Condition. Construction, other than of preliminary works, shall not commence until approval has been given by the Director-General and, with respect to the Fire Safety Study, approval has also been given by Fire and Rescue NSW. (a) CONSTRUCTION SAFETY STUDY A Construction Safety Study, consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 7, 'Construction Safety'</i>. For projects in which the construction period exceeds six (6) months, the commissioning portion of the Construction Safety Study may be submitted two months prior to the commencement of commissioning. (b) FIRE SAFETY STUDY A Fire Safety Study for the proposed project. This study shall cover the				

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	relevant aspects of the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines'</i> and the New South Wales Government's <i>'Best Practice Guidelines for Contaminated Water Retention and Treatment Systems'</i>. The study shall also be submitted for approval to Fire and Rescue NSW. (c) FINAL HAZARD ANALYSIS A Final Hazard Analysis of the proposed project, consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis'</i>. The FHA shall: address all relevant findings and recommendations from all official investigation report/s (if available) on the accident at West, Texas (USA) in April 2013; re-evaluate and confirm all relevant data and assumptions from the Preliminary Hazard Analysis; and re-evaluate and confirm all control measures proposed for the prevention and mitigation of incidents, particularly those controls relevant to ammonium nitrate.				
5	The Applicant shall develop and implement the plans and systems set out under subsections (a) to (c) of this Condition. No later than two months	Crawfords Group of Companies, Safety Management System Manual, Rev 24, November	The 2013 OEMP indicates that vehicle routes are detailed in a Traffic Management Plan prepared by Better Transport Futures in Section 4.9 and	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	prior to the commencement of commissioning of the proposed project, or within such further period as the Director-General may agree, the Applicant shall submit, for the approval of the Director-General, documentation describing those plans and systems. Commissioning shall not commence until approval has been given by the Director-General. (a) TRANSPORT OF HAZARDOUS MATERIALS Arrangements covering the transport of hazardous materials including details of routes to be used for the movement of vehicles carrying hazardous materials to or from the proposed development. The routes shall be selected in accordance with the Department of Planning' draft 'Route Selection' guidelines. Suitable routes identified in the study shall be used except where departures are necessary for local deliveries or emergencies. (b) EMERGENCY PLAN A comprehensive Emergency Plan and detailed emergency procedures for the proposed project. This plan shall include consideration of the safety of all people outside of the project who	2019 (not including appendices) (SMS Manual) - Crawfords Freightlines Pty Ltd, Site Emergency Plan, Crawfords Freightlines Sandgate Site, Lots 12 and 22 Old Maitland Rd, Sandgate 2304 NSW, Rev 17, 3 May 2022 - Crawfords, Pollution Incident Response Management Plan, Version 2, October 2021 - Better Transport Futures, Ammonium Nitrate Storage and Distribution Facility, Sandgate, NSW, Traffic Management Plan, Version 2, 20/06/13 (2013 TMP)	Annex J. The 2013 TMP, which includes the heavy vehicle haulage routes, has not been updated during the Audit Period. Facility personnel advised that the haulage routes have not changed. The SMS Manual and Site Emergency Plan were provided. Table 28 in the Site Emergency Plan indicates that during the Audit Period, the plan has been tested and/or reviewed seven times. However, limited evidence was provided to demonstrate the nature of testing, such as records of testing of emergency evacuation drills and pollution incident response. Testing appears to be mainly desktop. The 2020/2021 Annual Return indicates the Pollution Incident Response Management Plan (PIRMP) was tested on 15/04/21 and updated on 21/04/21. 'Table 7 Testing and Revision History' in the PIRMP indicates that the last two tests, which were desktop exercises of a potential diesel spill at the Fuel Cell, were conducted on 15/04/21 and 23/03/22.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	may be at risk from the project, including the assets and employees of Scafflink or its successors. The plan shall be consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'</i>. SAFETY MANAGEMENT SYSTEM A document setting out a comprehensive Safety Management System, covering all on-site operations and associated transport activities involving hazardous materials. The document shall clearly specify all safety related procedures, responsibilities and policies, along with details of mechanisms for ensuring adherence to the procedures. Records shall be kept on-site and shall be available for inspection by the Director-General upon request. The Safety Management System shall be consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 9, 'Safety Management'</i>.		Condition 5 is considered compliant but the Auditors consider that the Site Emergency Plan and PIRMP should be tested more in the field including at least one full evacuation exercise conducted annually. A record detailing the nature of the exercise/test, attendance record and required improvements should be retained. Recommendation: Ensure that records of testing of the Site Emergency Plan and PIRMP, which detail the nature of the exercise/test, attendance record and required improvements, are retained and readily available for review on request. Ensure that other monitoring requirements are being carried out and records retained in accordance with the Site Emergency Plan, PIRMP. OEMP and SMS Manual and Condition 5 requirements.		
6	PRE-STARTUP COMPLIANCE REPORT One month prior to the commencement of operation of the project, the Applicant shall submit to the Director- General, a report			Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	detailing compliance with Conditions 4 and 5 of this Schedule, including: (a) dates of study/plan/system submission, approval, commencement of construction and commissioning; (b) actions taken or proposed, to implement the recommendations and safety-related control measures in the studies/plans/systems; and (c) responses to each requirement imposed by the Director-General under Condition 10 of this Schedule.				
7	POST-STARTUP COMPLIANCE REPORT Three months after the commencement of operation of the project, the Applicant shall submit to the Director- General, a report verifying that: (a) the transport routes specified under Condition 5(a) are being followed; (b) the Emergency Plan required under Condition 5(b) is effectively in place and that at least one emergency exercise has been conducted; and (c) the Safety Management System required under Condition 5(c) has been fully implemented and that records required by the system are being kept.			Not triggered	
8	HAZARD AUDIT	2019 HA, 11/09/19	Hazard Audits were conducted in April 2017, 15 August 2019 and an audit was	Non-compliant	NC6

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	Twelve months after the commencement of operations of the proposed project and every two years thereafter, or at such intervals as the Director-General may agree, the Applicant shall carry out a comprehensive Hazard Audit of the proposed project and within one month of each audit submit a report to the Director-General for approval. The audits shall be carried out at the Applicant's expense by a qualified person or team, independent of the project, approved by the Director-General prior to commencement of each audit. Hazard Audits shall be consistent with the Department of Planning's <i>Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'</i> (HIPAP No. 5). The audit reports shall, in addition to the requirements provided in HIPAP No. 5: address all relevant findings and recommendations from all official investigation report/s (if available) on the accident at West, Texas (USA) in April 2013, and make recommendations if necessary; and Report on the findings of the audit in relation to compliance with the current version of AS 4326 - the Storage and	- DPE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility, Sandgate (SSD-5119) – Site Inspection Follow Up, 08/08/22, with attached: - DPIE email to Crawfords, Crawfords Ammonium Nitrate Storage and Distribution Facility (SSD 5119) Secretary Directions, 18/12/20 - DPE letter to Crawfords, Crawfords Freightlines, Sandgate (SSD 5119) – 2022 Hazard Auditor Approval, 02/09/22	due to be conducted around April 2021 depending on when operations commenced. Hence, the hazard audits have not been conducted at the required frequency of every two years, which is non-compliant. The 2019 HA report was issued on 11/09/19. The Auditors have not been provided with evidence of when the 2019 HA was submitted to the Department or whether the Department approved it. Facility personnel advised that the correspondence was not available as the person that managed the Hazard Audit in 2019 left the company and his emails and correspondence were subsequently lost. The 2019 HA addressed the findings of the West Texas (USA) accident and assessed compliance with AS 4326 and SAFEX guide. The 2019 HA report assessed completion of actions from the 2017 HA and made recommendations from the 2019 HA. Recommendation: Establish a process to ensure that Hazard Audits are conducted every two		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	handling of oxidizing materials and the relevant provisions of the current version of the SAFEX International <i>Good Practice Guide: Storage of Solid Technical Grade Ammonium Nitrate</i> . The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.		years or at such intervals as the Planning Secretary may agree. Retain records related to the conduct of Hazard Audits including the approval of the Auditor / Audit Team, the submission of the HA report to DPE and Planning Secretary's approval.		
9	The Applicant shall ensure that the Construction Safety Study (see Condition 4(a) of this Schedule), the Final Hazard Analysis (see Condition 4(c) of this Schedule), Safety Management System (see Condition 5(c) of this Schedule) and the Emergency Plan (see Condition 5(b) of this Schedule) for the site include an assessment and evaluation of all hazards that could contribute to both on-site and off-site risks to the satisfaction of WorkCover NSW. All maps showing the risk contours for on-site and off-site risks shall be included in each of the aforementioned documents.	- Crawfords Group of Companies, Safety Management System Manual, Rev 24, November 2019 (not including appendices) - Crawfords Freightlines Pty Ltd, Site Emergency Plan, Crawfords Freightlines Sandgate Site, Lots 12 and 22 Old Maitland Rd, Sandgate 2304 NSW, Rev 17, 3 May 2022	The Safety Management System Manual (SMS Manual) was last amended in November 2019 and last reviewed and signed off in November 2021. The SMS Manual does not include maps showing the risk contours for on-site and off-site risks, which is therefore considered non-compliant. The Site Emergency Plan was last updated in May 2022. It included risk contours for explosions and toxic gas release. Recommendation: Ensure that the SMS Manual includes maps showing the risk contours for on-site and off-site risks.	Non-compliant	NC7

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
10	FURTHER REQUIREMENTS The Applicant shall comply with all reasonable requirements of the Director-General in respect of the implementation of any measures arising from the reports submitted in respect of Conditions 4 to 9 of this Schedule inclusive, within such time as the Director-General may agree.			Not triggered.	
<i>Soil and Water</i>					
11	The Applicant shall ensure that all licensed surface water discharges from the site comply with the discharge limits (volume and quality) set for the development in any EPL or relevant provisions of the POEO Act.	Annual Returns – 2018/19, 2019/20, 2020/21, 2021/22	The site undertakes the required frequency of sampling in accordance with EPL 20295 requirements for stormwater discharge quality monitoring. The EPL 20295 does not specify concentration limits for the stormwater discharge points but does require compliance with Section 120 of the POEO Act. A review of the stormwater quality discharge concentrations against the OEMP stormwater quality 'ANZECC Levels' and 'Trigger Values' indicate that concentrations were consistently elevated particularly for Ammonia and Total Nitrogen. Therefore. Condition 11 is non-compliant. Recommendation:	Non-compliant	NC8

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Refer to the recommendations for Conditions 22 and 23.		
12	The Applicant shall store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participants Handbook</i> .	• Site visit on 12/09/22 • Interview with Crawfords on 12/09/22 • 2018 IEA • Section 6 – Action Plan, Crawfords Response • Fuelling Area Weekly Checks, 27/12/18, 12/2/19, 28/06/22, 09/09/22, 13/10/22, 28/10/22, 05/11/22	In the previous audit period, oils, waste oils and miscellaneous chemicals (degreases, paints and solvents etc.) were stored in Sheds C and D. These sheds were unbunded, with damage to the sealed floor potentially allowing leaks to infiltrate into underlying soils. Crawfords advised following the audit that a review of the chemical storage areas within the facility (particularly in Shed C and Shed D) would be taken to: • confirm if the current storage is required; • if storage is required, the storage would need to be upgraded to comply with the Australian Standards and/or EPA's <i>Storing and Handling Liquids: Environmental Protection – Participants Handbook</i>, by repairing the floor condition and installing bunding or portable bunds. During this Audit Period, Sheds C and D remained unbunded with various oils, waste oils and miscellaneous chemicals stored in ~1,000 L Intermediate Bulk Containers (IBCs) and ~200 L drums	Non-compliant	NC9

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			with the potential to infiltrate into the underlying soils. The majority of IBCs were observed to be bunded with portable pallet bunds. However, it is considered that pallet bunds are not best practice for the permanent storage of IBCs (e.g. waste oil in the Workshop in D Shed) and there was evidence of spills outside pallet bunds. The concrete floor was stained black in places. A number of IBCs were observed that were not bunded as follows: • ~Eight IBCs located in the northern container storage area (former timber yard) where miscellaneous items were stored outside; • One IBC to the north of the Quarantine waste storage tank; and • Two IBCs of waste liquid containing spilled AN to west of the AN load out area; and • ~Ten IBCs in the northern end of Shed D containing a hazardous chemical, 'Expense SC75 Bullfinch P'. Storage of AN per appropriate standards has been reviewed separately. No other		

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			chemicals, fuels and oils were observed stored in Sheds A and B. Diesel is stored within an above ground self-contained fuel storage tank (i.e. double-skinned) within the southern corner of the site with associated diesel fuel points along the train line boundary. Two IBCs containing diesel were also observed within a bund adjoining the same vicinity however the Auditors noted that the labelling on the IBCs did not meet SafeWork requirements. The Auditors identified some cracking in the bunds at the associated fuel points along the train line boundary. Recommendation: Conduct a review of the house keeping practices, monitoring and maintenance of chemical storage within Shed C and D, including the adequacy of bunding in the Workshop. It is also recommended that a review of chemical labelling be undertaken.		
13	During the construction of the development, the Applicant shall implement suitable erosion and sediment control measures on site, in	2015 IEA	This Condition has been assessed during the previous audit period.	Not triggered	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	accordance with the relevant requirements in the latest version of the EPA's <i>Managing Urban Stormwater: Soils and Construction</i> guideline.				
14	Prior to operation, the Applicant must, to the satisfaction of the Director-General, seal all AN: (a) storage areas on the site with impermeable hardstand concrete; and (b) trafficable areas (including internal roads) on the site with impermeable bitumen. Other impermeable materials shall be used to seal these areas if approved by the Director-General. Measures to inspect and maintain all sealed areas of the site for the life of the development must be documented in Operational Environmental Management Plan for the development (see Condition 2 in Schedule 4 of this consent). <i>Note: The intent of this condition is to minimise the potential for AN contamination of soil and water and dust generation from vehicles.</i>	• Site visit on 12/09/22 • Interview with Crawfords on 12/09/22 • 2015 IEA • 2018 IEA • 2013 OEMP	In the previous audit period, a section adjacent to the rail corridor (a potential AN trafficable area) was unsealed. During the site visits, all storage and trafficable areas were inspected. The Auditors confirm that the majority of areas were satisfactorily sealed with a relatively impermeable material (concrete or bituminised sealant hardstand). The OEMP states that regular inspections will be undertaken and the areas are maintained. The weekly site monitoring checklist requires condition of impermeable surfaces to be checked. Crawfords have advised employees contracted by the site owner are engaged to maintain the site surface. During the site visit, the Auditors observed an employee fixing a pothole at the site. As noted in the previous audits, the floor of Shed C requires repair. AN was	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			stated to not be stored in Shed C until the repairs have been completed. During the site inspection, it was observed that the floor of Shed C has not been repaired. However, Shed C is no longer approved or used to store AN.		
15	The Applicant shall prepare and implement a Contamination Management Plan for the development to the satisfaction of the Director-General. This Plan must: (a) be prepared by a suitably qualified and experienced expert in consultation with the EPA and NOW; (b) be approved by the Director-General prior to the commencement of construction; (c) detail the protocols to be put in place and followed in the event that contaminated soil (including Acid Sulphate Soils) or water is encountered during construction; (d) be prepared in accordance with the relevant best practice industry guidelines such as the NSW State Government's Acid Sulphate Soils Manual (ASSMAC 1998); (e) detail how excavated soil will be tested for contamination, handled and stockpiled;	• Interview with Crawfords on 12/09/22 • 2015 IEA • 2013 OEMP	During the initial 2015 Audit, the Auditors reviewed the Contamination Management Plan of the OEMP and confirmed that it complied with all the requirements listed in this condition. The Director General's approval of the Plan was sighted, dated 14 August 2014. Reportedly no updates have been made to the OEMP since the initial 2015 Audit however it is understood that an updated version will be developed as part of the revised OEMP.	Not triggered	

Table A: Compliance with SSD-5119					
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	(f) detail the measures that will be employed to prevent erosion and sedimentation of contaminated soil and suppress odour; and (g) outline how contaminated soil and water will be disposed of off-site at a licensed facility.				
16	The Applicant must ensure that all structures on site (excluding shipping containers) that are used to store AN are flood proof up to the 1% Annual Exceedance Probability plus 500mm freeboard depth design flood event and are maintained in this manner for the life of the development. <i>Note: Flood levels shall be determined considering the effects of climate change.</i>	• Site visit on 12/09/22 • Interview with Crawfords on 12/09/22 • 2015 IEA • 2018 IEA	During the initial 2015 Audit, the Auditors sighted Certification of Structural for Buildings A, B and C by Procim, Pty Ltd, (Chartered Professional Engineer) on the 2 October 2014. The letter concluded the that Sheds A, B & C will withstand "flooding caused loads by water levels up to and including a 1% Annual Exceedance probability plus 500 mm free board as consideration for effects of climate change". The inspection in 2015 noted Shed A flooding in two areas adjacent to the external fire doors. This reportedly occurred due to pooling of water outside the shed after the stormwater tank overflowed during a high rainfall event. Crawfords had not formally assessed that rainfall event exceeded the 1% Annual Exceedance Probability. During the 2018 inspection, sandbags were noted at the doors within Shed A and B as well as the door entries lifted	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			above the ground floor to minimise overflow water into the sheds. Crawfords advised this was done to address the flood mitigation requirement. During the site visit during this Audit Period, there was no evidence of flooding around the sheds. Crawfords have advised there had been no flooding into Shed A and B during this Audit Period.		
17	Prior to the commencement of operation, and annually thereafter, the Applicant must obtain structural certification from a suitably qualified engineer that all structures on site (excluding shipping containers) that are used to store AN are flood proof up to the 1% Annual Exceedance Probability plus 500mm freeboard depth design flood event. A copy of these structural certification documents must be included in the Flood Risk Management and Response Plan (see Condition 21 in Schedule 3 of this consent) and Operational Environmental Management Plan (see Condition 2 in Schedule 4 of this consent) for the development.	• 2018 IEA • Section 6 – Action Plan, Crawfords Response • Advitech 2021, Shed A, B and C Structural Inspection via Walkways • PROCIM Industrial Design, Certification of Structural Design – annually dated 12/12/18 • PROCIM Industrial Design, Certification of Structural Design – annually dated 25/11/19 • Crawfords Site Emergency Plan, Revision 17 dated 03/05/22	During the previous audit period, the Auditors sighted the annual Structural Certificate prepared by Procim Industrial Design dated 18 February 2018. However, it was not sighted within the Flood Risk Management and Response Plan and the OEMP. Crawfords advised following the audit that a copy of the certificate will be appended to the Site Emergency Plan (flood risk section) and the OEMP at each annual issuance. During this Audit Period, the Auditors sighted the annual Structural Certificates prepared by Procim Industrial Design in 2018 and 2019 and Advitech in 2021. However the certificates were not sighted within the Flood Risk Management and Response	Non-compliant	NC10

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>Note: Flood levels shall be determined considering the effects of climate change.</i>		Plan, or contained in the Site Emergency Plan or the OEMP. Recommendation: Implement a procedure to ensure the structural certification documents are included as an appendix to the site emergency response plan and OEMP.		
18	The Applicant must ensure that any shipping containers that are used to store AN onsite are unloaded to the AN storage sheds (A, B or C) as soon as practicable once they arrive on site.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	Crawfords advised that no AN shipping containers have been delivered to the site. AN is delivered in bulker bags by truck from the Port of Newcastle. During the site visit, the Auditors observed AN being placed into a shipper container which was to be taken offsite shortly after. The Auditors consider this condition is compliant.	Compliant	
19	The Applicant must ensure that no AN is left inside a shipping container during a major flood event and that all AN is contained within the AN storage sheds (A, B or C) during a major flood event.	Interview with Crawfords on 12/09/22	Crawfords have advised there have been no major flood events during this Audit Period.	Not triggered	
20	The Applicant must ensure that all flood emergency response equipment is able to withstand floodwaters up to and including the 1% AEP plus 500mm freeboard depth flood event.	2018 IEA 2013 OEMP - Crawfords Site Emergency Plan, Revision 17 dated 03/05/22	Flood emergency response equipment is addressed in the Flood Risk Management and Response Plan, also in Section 11.9 of the Site Emergency Plan and in the 2013 OEMP. Given recent	Compliant	

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>Note: Flood levels shall be determined considering the effects of climate change.</i>		major flooding in NSW, likely due to climate change impacts, a review of flood emergency response equipment is warranted. Recommendation: If it hasn't already been done, review the flood emergency response equipment as part of the OEMP review.		
21	The Applicant must prepare and implement a Flood Risk Management and Response Plan for the development to the satisfaction of the Director-General. The Plan must: (a) be prepared by a suitably qualified and experienced expert in consultation with Council and OEH; (b) be approved by the Director-General prior to the commencement of operations; (c) be prepared in accordance with Council's <i>Newcastle City-wide Floodplain Risk Management Study and Plan 2012</i> and the <i>NSW Floodplain Development Manual</i> ; (d) include a copy of the structural certification documents required in relation to flood proofing by Condition 17 of this Schedule; (e) identify the procedures that would be implemented to ensure compliance	• 2018 IEA • Section 6 – Action Plan, Crawfords Response • Crawfords Site Emergency Plan, Revision 17 dated 03/05/22	During the previous audit period, the Director General's (now Planning Secretary) approval of the Flood Risk Plan had not been sighted and an updated copy of the structural certification was not included. Crawfords responded following the audit, the plan was under revision during October/November 2018 and approved on 28/11/18 and is now attached in the site Emergency Response Plan. The revised Site Emergency Plan was reviewed. A Flood Response plan is provided in Section 11.9. The plan does not include a copy of the structural certification and a staff training program to be implemented. Section 21.1 Training and Education does not refer to flood response training. Based on Section 28, the flood response plan has not been tested.	Non-compliant	NC11

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APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	with Conditions 18 to 20 of this Schedule; (f) identify the procedures that would be implemented to ensure that employees are given sufficient warning regarding an impending flood event; (g) identify the procedures to be followed and contingency actions to be implemented in the event that the site is inundated during a flood event to protect: the integrity of structures on site that are used to store ammonium nitrate to prevent release of ammonium nitrate into floodwaters and the local environment; human safety; (h) identify emergency evacuation routes, flood warning alarms, and evacuation procedures; and (i) include a staff training program to be implemented to ensure existing and future employees are well trained and drilled in executing the flood emergency response procedures detailed within this plan.		Evidence of consultation with Council and the OEH and approval by the Planning Secretary has not been provided for review by the Auditors. Recommendation: A review of the current Site Emergency Plan should be undertaken in consultation with Council and the OEH and approved by the Planning Secretary. A procedure should be implemented to ensure the structural certificates are attached to the plan. The Site Emergency Plan should include a flood response staff training program including maintaining records of drills.		
22	The Applicant shall prepare and implement a Water Management Plan for the development to the satisfaction of the Director-General. This plan must:	• 2018 IEA • Section 6 – Action Plan, Crawfords Response • Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	During the previous audit period, the preparation of the Water Management Plan was considered adequate however the implementation of the Water Management Plan was not compliant, in	Non-compliant	NC12

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	(a) be prepared in consultation with Council, OEH and NOW by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of construction; (c) include final details of water use, management and license requirements for the development; (d) include a Stormwater Management Plan that demonstrates how the requirements of Condition 23 of this Schedule have been addressed; and (e) include a Surface water and Groundwater Monitoring and Mitigation Plan that includes: - a methodology to be followed to establish baseline data on surface and groundwater quality and groundwater levels; - a program to monitor surface water flows and quality, and ecosystem health immediately downstream of the site; - a program to monitor groundwater levels and quality beneath the site and groundwater dependent ecosystems; - surface and groundwater impact assessment criteria including trigger levels for investigating adverse impacts	• 2013 OEMP • 2018 and 2019 DP1-5 data	particular the frequency of sampling at the nominated locations. The Auditors recommended that the Water Management Plan should be reviewed to identify improvements that would contribute to improvements to water quality so as to comply with water quality criteria. Crawfords advised following the audit, that when Crawford's had received feedback and/or recommendations from the Department arising from the IEA Action Plan, it was planned that the OEMP would be amended to reflect any recommendations including improvements to the water and stormwater management plans. During this Audit Period, Crawfords have advised that a review and update to the OEMP which includes the Water Management Plan would be undertaken. The Auditors observe that the Water Management Plan does not include groundwater assessment criteria, which is considered non-compliant and should be rectified in the revised Water Management Plan. As discussed in the finding for Condition 11, stormwater quality assessment		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	and implementing mitigation measures; - protocols for investigation and implementing mitigation measures for identified exceedances of the surface and/or groundwater impact assessment criteria; and - a schedule of improvements to be implemented to the stormwater management and collection system at the site in the event that exceedances of the surface and/or groundwater impact assessment criteria are identified or contaminated water is found to be leaving the site.		criteria were exceeded. Based on the elevated concentrations the Auditors consider the implementation of the Water Management Plan has not been effective and therefore, is non-compliant. During the site visit it was observed that work had commenced to re-line the stormwater retention ponds in order to prevent potential interactions between groundwater and stormwater and improve stormwater quality. Recommendation: Review the Water Management Plan to identify improvements that would contribute to improvements to water quality so as to comply with water quality assessment criteria. Identified improvement actions, such as the work underway to improve the stormwater retention ponds, should be documented in the Water Management Plan. Include groundwater quality assessment criteria in the Water Management Plan.		
23	The Stormwater Management Plan must:	2018 IEA - Section 6 – Action Plan, Crawfords Response	During the previous audit period, the Auditors sighted stormwater analysis completed from 2017 to 2018 with exceedances of various samples to the	Non-compliant	Refer to NC8

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(a) include final detailed design specifications for the stormwater management and collection system; (b) ensure that the stormwater management and collection system is designed and installed generally in accordance with the conceptual design in the EIS/RTS, applicable Australian Standards and industry standard best practice guidelines; (c) detail how stormwater runoff from the site would be conveyed; (d) detail how (and ensure that) stormwater runoff from the site would be restricted to pre-development rates or less; (e) ensure that no additional stormwater runoff from the site would flow into the adjacent rail corridor; (f) ensure that stormwater discharged off-site meets the pollutant load reduction targets outlined in Section 7.06 of Council's DCP and the water quality performance indicators outlined in Table 3.3.2 of the ANZECC Guidelines; and (g) describe the measures that would be implemented to maintain stormwater infrastructure for the life of the development.	- Annual Return – 2018/19, 2019/20, 2020/21, 2021/22 2013 OEMP 2018 and 2019 DP1-5 data	OEMP criteria for total nitrogen; pH; nitrite as N; and ammonia as N. No analysis was completed for dissolved oxygen, chlorophyll, filterable reactive phosphate; and oxides of nitrogen which are listed in the Table 3.3.2 of the ANZECC Guidelines. The Auditors recommended the Stormwater Management Plan should be reviewed to identify improvements that would contribute to improvements to water quality so as to comply with water quality criteria. Crawfords advised following the audit, that when Crawford's had received feedback and/or recommendations from the Department arising from the IEA Action Plan, it was planned that the OEMP would be amended to reflect any recommendations including improvements to the water and stormwater management plans. During this Audit Period, the Auditors reviewed stormwater analysis completed for 2018 to 2022. Similar to the previous audit, exceedances of the OEMP stormwater quality 'ANZECC Levels' and 'Trigger Values' were observed for Total Nitrogen; Nitrate as N; and Ammonia as N. pH was also		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			observed to be alkaline at times (>8.5 pH units). No analysis was completed for dissolved oxygen, chlorophyll, filterable reactive phosphate; and oxides of nitrogen which are listed in the Table 3.3.2 of the ANZECC Guidelines. Recommendation: Review the Stormwater Management Plan to identify improvements that would contribute to improving stormwater quality and comply with stormwater quality criteria. Identified improvement actions, such as the work underway to improve the stormwater retention ponds, should be documented in the Stormwater Management Plan.		
<i>Noise and Vibration</i>					
24	The Applicant shall ensure that the noise generated by the operations on-site does not exceed the limits in Table 1 at any private residential receiver. <i>Table not listed. Refer to Development Consent (SSD-5119) in Appendix A.</i>	2015 IEA - Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	Noise monitoring report prepared by ERM dated 29 May 2015 was sighted by during the 2015 audit. The results showed that noise generated on site does not exceed the limits in Table 1. Subsequent noise monitoring has not been undertaken. Crawfords advised and noted in the annual returns that no noise complaints have been received during this Audit Period.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
25	The Applicant shall comply with the operating hours in Table 2 for the site, unless otherwise agreed in writing by the Director-General. <i>Table not listed. Refer to Development Consent (SSD-5119) in Appendix A.</i>	2018 IEA - Section 6 – Action Plan, Crawfords Response - Roster Timesheet Comparison Report 20220801 - 20220831 - Crawfords email to Ramboll, Operating Hours, 10/11/22	During the previous audit period, the facility was operating outside of the approved operating hours. Crawfords responded following the audit that a review was conducted during October 2018 revealing no exceedances of hours relative to AN task. During this Audit Period, Crawfords provided a selection of timesheet records for August 2022 which were reviewed by the Auditors. The earliest noted starting time was 5:30am, and the latest finishing time was 10:36pm. Therefore the facility has operated outside of the approved operating hours. Crawfords advised that they understand that they “are allowed to operate outside of regular operating hours when [product unloaded from] a vessel is coming into the site”, supported by Section 2.5.2 in the OEMP, which indicates unloading a vessel. However, there is no agreement in writing from the Department to allow operating outside approved hours in accordance with Condition 25, SSD-5119. Recommendation:	Non-compliant	NC13

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Ensure that the approved hours of operation are complied with, as shown in Condition 25 or as otherwise agreed in writing by the Planning Secretary.		
26	The Applicant shall: (a) implement best management practice, including all reasonable and feasible measures to prevent and minimise noise and vibration during construction and operation of the development (including low frequency noise and traffic noise); (b) minimise the noise impacts of the development during adverse meteorological conditions when noise criteria do not apply; (c) maintain the effectiveness of any noise suppression equipment on plant at all times and ensure defective plant is not used operationally until fully repaired; and (d) regularly assess noise monitoring data and relocate, modify and/or stop operations to ensure compliance with the relevant conditions of this consent.	• 2015 IEA • 2013 OEMP • ERM 2015, Noise and Vibration Management Plan • Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	Noise mitigation measures are detailed in the OEMP. An initial noise monitoring report was prepared by ERM dated 29 May 2015 was sighted by during the 2015 audit. The results showed that noise generated on site does not exceed the limits in Table 1. Subsequent noise monitoring has not been undertaken. Crawfords advised and noted in the annual returns that no noise complaints have been received during this Audit Period. The Auditors consider this condition has been met.	Compliant	
27	The Applicant shall prepare and implement a Noise and Vibration Management Plan for the development in consultation with the EPA and to the satisfaction of the Director-General. The plan must:	• 2015 IEA • 2013 OEMP • ERM 2015, Noise and Vibration Management Plan • Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	A Noise and Vibration Management Plan was prepared as part of the OEMP and has not been revised since the initial 2015 Audit.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(a) be prepared and implemented by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of operations; (c) describe the measures that will be implemented to minimise noise and vibration from the operation of the development and ensure: - best management practice is being employed on site; traffic noise is effectively managed; - the noise impacts of the development are minimised during any meteorological conditions when the noise criteria in this consent do not apply; and - compliance with the relevant conditions of this consent. (d) describe the noise management system; (e) includes a noise monitoring program that: - is capable of evaluating the performance of the development; - includes a protocol for determining exceedances of the relevant conditions of this consent and responding to complaints		The OEMP's Noise and Vibration Management Plan sets out noise management measures; responsibility and noise validation; determining compliance; additional measures; reporting; managing complaints; additional noise monitoring. Crawfords advised and noted in the annual returns that no noise complaints have been received during this Audit Period. The Auditors consider this condition has been met.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	- adequately supports the noise management system; evaluates and reports on the effectiveness of the noise management system; and includes a protocol for the implementation of further mitigation in consultation with the EPA in the event that the development is found not to be complying the conditions of this consent.				
28	Within 2 months of the commencement of operations, the Applicant shall undertake Noise Compliance Monitoring. The Monitoring shall: (a) be undertaken by a suitably qualified and experienced expert in consultation with the EPA; (b) be submitted as a report to the EPA and the Department within 2 weeks of its completion; (c) be undertaken to present worst-case noise operations during a period of combined truck and rail operations as described in Annexure I of the EIS; (d) include noise monitoring undertaken at day, evening and night (including shoulder periods), as defined in the EPA's Industrial Noise Policy, over 3 consecutive operating days for a minimum of: - 1.5 hours during the day;	• 2015 IEA	Assessed in a previous audit and not triggered during this Audit Period.	Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	- 30 minutes during the evening; and - 1 hour at night. (e) compare the noise monitoring results against the noise modelling predictions (including that for shoulder periods) in the EIS; (f) identify whether the project is complying with the development noise limits specified in Condition 24 of this Schedule; and (g) outline the mitigation measures to be implemented if exceedances of the development noise limits (Condition 24) or the noise modelling predictions in the EIS are identified, to the satisfaction of the Director-General.				
<i>Air Quality</i>					
29	The Applicant shall ensure the development does not cause or permit the emission of any offensive odour (as defined by the POEO Act).	• Site visit on 12/09/22 • Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	No offensive odours were noted during the site inspection. The site is unlikely to generate any offensive odours. Crawfords have advised there have been no odour complaints recorded to date and no complaints recorded in the annual returns.	Compliant	
30	The Proponent shall ensure that dust generated by the development does not exceed the criteria listed in Tables 3 to 5 at any private residential receiver, or on more than 25 percent	• 2018 IEA • ERM, 2021, Crawford Monitoring Works – Air Quality Monitoring Report Reference Year 2020	During this Audit Period, air quality monitoring has continued to be measured at the site at the three existing DDGs. The air quality monitoring report for the year 2020 has	Non-compliant	NC14

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	of any privately owned land surrounding the site. <i>Table not listed. Refer to Development Consent (SSD-5119) in Appendix A.</i>	2013 OEMP	been reviewed by the Auditors which measured deposited dust against the criteria in Table 5. The air quality monitoring did not assess Total suspended particulate (TSP) matter or Particulate matter < 10 µm (PM₁₀). The results of the 2020 monitoring reported continued elevated deposited dust concentrations above the long term criteria throughout 2020 both on and off site. ERM reported that the majority of the dust onsite is comprised of mineral dust and soils and considered to be attributed to both off and onsite sources. Air quality monitoring reports were not provided for 2019 or 2021. Whilst the monitored results may not be indicative of deposited dust levels at any private residential receiver or 25% of privately owned land surrounding the site, based on the available information, the deposited dust levels are considered non-compliant with Condition 30. Recommendation: Review the air quality monitoring program to assess whether deposited dust monitoring at additional offsite locations would provide a more accurate determination of whether deposited		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			dust levels at any private residential receiver or 25% of privately owned land surrounding the site are in fact being exceeded. Evaluate current dust mitigation measures as part of the revision of the OEMP.		
31	The Applicant shall ensure that: (a) all vehicles on site do not exceed a speed limit of 20 kilometres per hour; (b) all loaded vehicles entering or leaving the site have their loads covered; and (c) all loaded vehicles leaving the site are cleaned of dirt, sand and other materials before they leave the site, to avoid tracking these materials on public roads.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22 - Crawfords Site Induction – Sandgate Intermodal Terminal	a) Speed limits are kept to 10 km/h on site roads as indicated by signs and in the site induction. During the site visit, the Auditors observed some forklifts that appeared to be driving at speed potentially higher than the 10 km/h speed limit, however, this could not be verified. b) The Auditors noted trucks covered during the site inspection. c) A wash down bay is located in Shed D. The upgrades to the site internal roads has mitigated dirt/mud on tyres on the tyres leaving the site. Recommendation: The Auditors recommend as an opportunity for improvement to review forklift driving procedures and training to confirm all site personnel understand the speed limit at the site.	Compliant	
32	The Applicant shall: (a) implement best management practice, including all reasonable and feasible dust and odour mitigation	2018 IEA - Section 6 – Action Plan, Crawfords Response	During the previous audit period, the Auditors recommended that the dust and odour mitigation measures included in the OEMP should also be reviewed as	Non-compliant	NC15

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	measures to prevent and minimise dust emissions from construction and operation of the development; (b) prevent and minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; (c) regularly assess air quality monitoring data and relocate, modify, and/or stop operations to ensure compliance with the relevant conditions of this consent; and (d) minimise surface disturbance of the site, other than as permitted under this consent.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • ERM, 2021, Crawford Monitoring Works – Air Quality Monitoring Report Reference Year 2020 • 2013 OEMP	part of the review of the air monitoring program as well as monitor the upgrades to paving of yard and trafficable areas according to agreed program. During this Audit Period, the Auditors observed the upgrades to paving of the yard and trafficable areas according to the agreed program. Crawfords have advised that a review of the OEMP has yet to be undertaken. During the site visit, the Auditors observed dust being generated during operation. The following measures as outlined in the OEMP were observed being implemented: sealed road surfaces; water cart; complaints hotline; and vehicle speed limits. Crawfords have also advised that air quality monitoring has continued to be undertaken at the site. The Auditors consider this condition is non-compliant based on the elevated level of dust observed during the site visit and the elevated concentrations identified through the air quality monitoring.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Recommendation: Review and improve dust mitigation measures to minimise dust emissions from operation of the development.		
33	The Applicant shall implement all reasonable and feasible measures to minimise: (a) energy use on site; and (b) greenhouse gas emissions produced on-site, to the satisfaction of the Director-General.	2018 IEA - Interview with Crawfords on 12/09/22 - GB Electrical Contractors Quotation – High bay lighting in Warehouse A and B, 19/10/16	Crawfords advised during the previous audit period that the following measures had been implemented to address greenhouse gas emissions and reduce fuel use and energy demand: - all new heavy haulage trucks meet EPA 2017 Emission Standards or the equivalent - all trucks plant and equipment are maintained to manufacturers specifications - engine oils used by Crawfords exceed most manufacturers specifications - only high-quality diesel fuel is used - typically Shell or Pacific Petroleum - replacement of halogen globes with LED globes During this Audit period, Crawfords have also advised that security lighting is on a timed and motion sensor system.	Compliant	
34	The Applicant shall prepare and implement an Air Quality Management Plan for development in consultation with Council and the EPA. The plan must:	2015 IEA - Interview with Crawfords on 12/09/22	An Air Quality and Greenhouse Gas Management Plan was prepared as part of the OEMP and reviewed during the previous audit period. Crawfords have	Non-compliant	NC16

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(a) be prepared and implemented by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of operation; (c) describe the measures that will be implemented to ensure: - best management practice is employed; generation of dust from AN handling and internal vehicles movements on site is minimised as far as reasonably practicable; - the air quality impacts (in particular dust and odour) from operations are minimised during adverse meteorological conditions and extraordinary events and compliance with the relevant conditions of this consent. (d) describes the air quality management system; and (e) includes an air quality monitoring program that: - is capable of evaluating the performance of the development; - includes a protocol for determining any exceedances of the relevant conditions of consent and responding to complaints;		advised there have been no updates been undertaken to the plan. The Auditors consider this condition is non-compliant based on the elevated levels of dust observed during the site visit and the elevated concentrations identified through the air quality monitoring, both of which indicate that the Air Quality Management Plan has not been effective. Recommendation: Further to the recommendation for Schedule 3, Condition 32, review and revise the Air Quality Management Plan to incorporate improved dust mitigation measures.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	- adequately supports the air quality management system; - evaluates and reports on the effectiveness of the air quality management system; and - includes a protocol for the implementation of further mitigation in consultation with the EPA and Council in the event that the development is found not to be complying the conditions of this consent.				
<i>Traffic</i>					
35	The Applicant shall provide a secure bicycle enclosure for at least 3 bicycles on site to encourage the use of sustainable transport to and from work.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Crawfords, S.O.P. 51, Traffic Management Plan Sandgate, V2, July 2020	The Traffic Management Plan indicates that secure parking for bicycles is provided at the gatehouse as use of bicycles is not permitted onsite.	Compliant	
36	The Applicant shall ensure that 1 train (2 movements) in total (with a maximum of 40 carriages at 76 tonnes per carriage) is permitted to ingress and egress from the site in any 24 hour period.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22	Crawfords advised that AN is currently only transported via road, not by rail. However, it remains possible that AN could be transported by rail as indicated in the 2013 OEMP or SMS Manual. Shipping containers are transported by rail. Crawfords advised that only a single train enters and leaves the rail siding each day. A train may include up to 3 locomotives and 55 wagons carrying between 60 to 70 tonnes per wagon.	Non-compliant	NC17

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			The maximum load a train may transport is 4,130 tonnes but is typically 3,400-3,500 tonnes. However, this appears to exceed the maximum allowed number of carriages. Crawfords did not provide requested train movement and tonnage data to demonstrate compliance with Condition 36 requirements. Therefore, Condition 36 is considered non-compliant. Recommendation: Review train movements to assess compliance with Condition 36. Ensure that Condition 36 requirements are met or alternatively, seek DPE approval to vary Condition 36.		
37	The Applicant shall prepare and implement a Rail Transport Code of Conduct for the development to the satisfaction of the Director-General. This Plan must: (a) be prepared in consultation with ARTC by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of operation; (c) detail operational rail traffic management measures including	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Crawfords, Code of Conduct, Rail Transport and Siding Operations, V1, Sept 2013 • Fuelling Area Weekly Checks, 27/12/18, 12/2/19, 28/06/22, 09/09/22, 13/10/22, 28/10/22, 05/11/22	Facility personnel advised that AN is not currently transported to or from site on trains. Trains are primarily used for transporting empty shipping containers or refrigerated shipping containers, referred to as Reefer Boxes. Shipping containers are reportedly used to pack aluminium alloy for road transport. Crawfords provided the 2013 Code of Conduct, Rail Transport and Siding Operations. It has not been updated since the previous audit	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	driver code of conduct, locomotive arrival and departure procedures (e.g. reduced locomotive speed); (d) outline measures to minimise rail traffic noise; (e) detail procedures to ensure trains do not queue on the public rail or road network; and (f) detail measures to minimise rail traffic related conflicts with existing rail operations.		The Auditors did not observe a train movement during the site visit and a train was not present at the rail siding. The Auditors have no reason to believe that rail operations at the site are not being implemented generally in accordance with the Code of Conduct, Rail Transport and Siding Operations.		
38	The Applicant shall ensure that: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest versions of AS 2890.1 and AS 2890.2; (b) the swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, is in accordance with AUSTRROADS – Guide to Road Design; (c) the development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the development do not park or	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Crawfords, S.O.P. 51, Traffic Management Plan Sandgate, V2, July 2020 • Crawfords Site Induction – Sandgate Intermodal Terminal, not dated	The Traffic Management Plan Sandgate and the Traffic Management Map attached to the Crawfords Site Induction appear to reflect the requirements of Condition 38. Although it is noted that the Traffic Management Map is out of date as it still indicates that the northern end of the site is used for “Timber Parking”, which reportedly ceased in 2020. There was no evidence observed during the site visit that Condition 38 was not being complied with. Recommendation: Attach the current Site Map to the Crawfords Site Induction.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	stand on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; (f) all loading and unloading of materials is carried out on site; and (g) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.				
39	The Applicant shall prepare and implement a Traffic Management Plan for the development, to the satisfaction of the Director-General. The plan must: (a) be prepared in consultation with Council and RMS by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to commencement of operation; (c) include a plan showing the designated haulage route/s to be used by heavy vehicles during operation; (d) include a heavy vehicle driver code of conduct; (e) describe the measures that will be implemented to ensure: - the nominated haulage route/s in used;	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Crawfords, S.O.P. 51, Traffic Management Plan Sandgate, V2, July 2020 • Crawfords Site Induction – Sandgate Intermodal Terminal, not dated • 2013 TMP • Employee Details – Current Certification records	The Traffic Management Plan Sandgate , which was provided to the Auditors, relates to traffic management at the site. It does not address the requirements of Condition 39, such as designated haulage route/s to be used by heavy vehicles during operation or the heavy vehicle driver code of conduct. The Auditors understand that the 2013 TMP, which includes the heavy vehicle haulage routes, has not been updated during the Audit Period. The Auditors observe that the 2013 TMP does not include: • a program to monitor the effectiveness of these measures; and	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	- conflicts with other road users are minimised; - haulage is minimised or routes altered to avoid impact on the local traffic network; - drivers adhere to the code of conduct; - compliance with the relevant conditions of this consent; and (f) include a program to monitor the effectiveness of these measures.		• a code of conduct but instead refers to Annex B of the OEMP. Annex B is the Safety Management System. The SMS Manual refers to a process for reviewing route plans on a 6 monthly basis. The SMS Manual includes a Road Transport Code of Conduct. An employee training record shows that he had completed 'Crawfords SMS Code of Conduct' training in 2019. Collectively, it is considered that the 2013 TMP, 2013 OEMP and SMS Manual generally meet the requirements of Condition 39, and therefore, is considered compliant. However, the Auditors have been unable to verify that a program to monitor the effectiveness of the measures is being implemented. Recommendation Ensure that records are retained to demonstrate that a program to monitor the effectiveness of the Traffic Management Plan measures is being implemented as detailed in the 2013 TMP, 2013 OEMP and SMS Manual.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
<i>Waste</i>					
40	The Applicant shall ensure that any waste generated on the site during construction is classified in accordance with the EPA's Waste Classification Guidelines and disposed of to a facility that may lawfully accept the waste.	2015 IEA - Interview with Crawfords on 12/09/22 - Allshelter 2019, Shelter Assembly CATA1412A	No construction has occurred onsite which caused any waste being generated. A Shelter was installed during the Audit Period. The Auditors have not sighted any waste documentation records for the shelter. However, the Auditors have no reason to believe that Condition 40 requirements were not met during the installation of the Shelter.	Compliant	
41	The Applicant shall ensure that any asbestos encountered during construction is handled and disposed of by appropriately qualified and licensed contractors in accordance with the relevant guidelines, the Work health and Safety Regulation 2011 and in consultation with WorkCover.		No construction has occurred onsite which encountered any asbestos.	Not triggered	
42	Upon the commencement of construction, the Applicant shall implement the Asbestos Management Plan in Annexure C of the EIS including all recommendations of this plan.	ACM Inspection Register dated 03/12/21	No construction has occurred onsite which encountered any asbestos. An ACM inspection register is held by the site for the asbestos remaining onsite.	Not triggered	
43	The Applicant shall prepare and implement a Waste Management Plan for the development to the satisfaction of the Director-General. This Plan shall:	2015 IEA - Interview with Crawfords on 12/09/22	The Waste Management Plan was prepared as part of the OEMP and reviewed during the previous audit period. Crawfords have advised there	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(a) be prepared in consultation with the EPA by a suitably qualified and experienced expert; (b) be approved by the Director-General prior to the commencement of construction; (c) detail the type and quantity of waste to be generated by the construction and operational phases of the development; (d) detail the materials to be reused or recycled, either on or off site; (e) detail the procedures for handling, storage, collection of recycling and disposal of waste in accordance with the best practice industry standards and guidelines; and (f) detail the measures to ensure that waste (particularly liquid waste) is not released into the local environment.	• JJ's Waste & Recycling Waste Invoice dated 30/06/22 • Singleton Tyre & Battery Centre Waste Invoice dated 22/08/22 • K&S Recyclists Pty Ltd Invoice No. INV-0137 dated 03/08/22 • NSW EPA Online Waste Tracking CA no. 2C00188966 dated 02/09/22 • NSW EPA Online Waste Tracking CA no. 2C00188967 dated 02/09/22 • JR Richards & Sons Waste Invoice dated 30/09/22	have been no updates been undertaken to the plan. General waste and recyclable waste are separated and taken off site by a licensed contractor (JR Richards & Sons Pty Ltd). Waste disposal receipts were sighted by the Auditors. Truck types are also separated and taken off site by a licensed contractor (Singleton Tyre & Battery Centre). Waste disposal receipts were sighted by the Auditors. Waste oil is collected and disposed of by a licensed contractor (JJ's Waste & Recycling Pty Ltd). Waste disposal receipts were sighted by the Auditors. AN packaging (i.e. bags) are taken offsite separately and disposed of by K&S Recyclists Pty Ltd. Waste disposal documentation was sighted by the Auditors. Crawford advised any loose AN swept up during decanting is collected and mixed with water in an IBC for offsite personal irrigation purposes.		

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
<i>Heritage</i>					
44	The Applicant shall conduct heritage education inductions for all construction personnel at the site (including procedures for keeping records of inductions including site identification, protection and conservation of Aboriginal and historic heritage. Inductions must be developed in consultation with suitable representatives of the local Aboriginal community such as registered Aboriginal parties and inductions records must be kept and made available to the Director-General upon request.			Not triggered	
45	The Applicant shall cease all works on site in the event that any Aboriginal cultural object(s) or human remains are uncovered onsite. In the event that an Aboriginal cultural object(s) is uncovered, a suitably qualified and experienced archaeologist, suitable representatives of the local Aboriginal community such as registered Aboriginal parties and the OEH must be contacted to determine the significance of the object(s). In addition, in the event that human remains are uncovered onsite, NSW Police are to be notified. Works shall not resume in the			Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	designated area until consent in writing from the NSW Police and/or the OEH has been obtained.				
<i>Visual Impacts</i>					
46	The Applicant shall ensure that the lighting associated with the development: (a) complies with the latest version of <i>AS 4282(INT) - Control of Obtrusive Effects of Outdoor Lighting</i> ; and (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	- Site visit on 12/09/22 - Interview with Crawfords 12/09/22	Section 5.6.1 of the OEMP indicates lighting will comply with the requirements of Condition 46. The site has not reviewed AS4282 to confirm site lighting is in compliance with the Standard. However, no complaints have been received about the lighting. The Auditors have no evidence to suggestion Condition 46 is not being complied with.	Compliant	
47	The Applicant shall not install any advertising signs on site without the written approval of the Director-General.	- Site visit on 12/09/22 - Interview with Crawfords 12/09/22		Not triggered	
<i>Energy and Water Efficiency</i>					
48	The Applicant shall implement all energy and water efficiency measures outlined in the EIS and regularly review opportunities to implement further efficiency measures.	2013 OEMP	No energy or water efficiency measures have been reviewed or implemented during the Audit Period, aside from the possible installation of light-emitting diode (LED) lights in the office. However, there is no evidence that the Crawfords has not implemented all energy and water efficiency measures outlined in the EIS.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			The 2013 OEMP addresses some energy efficiency measures in Section 5.4.5 including motion detectors on lights, insulation to reduce heating and cooling costs and window awnings. The 2013 OEMP does not address water efficiency measures. Crawfords advised that energy and water efficiency are not regularly reviewed. Recommendation: Review and revise the OEMP to: - include water efficiency measures; and - a process to regularly review opportunities to implement further energy and water efficiency measures, that is recorded.		
<i>Security</i>					
49	The Applicant shall: (a) install and maintain a perimeter fence and security gates on the site; (b) ensure that all buildings on-site that contain dangerous goods are locked whenever they are unattended; (c) ensure that the security gates on-site are locked whenever the site is unattended; and (d) ensure that a suitably qualified and experienced person (or persons) is	- Site visit on 12/09/22 - Interview with Crawfords 12/09/22	The Auditors confirmed the existence of the security fence and security guard at the gate. Crawfords have advised that a security guard is employed 24/7.	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	employed to keep the site secure 24 hours, 7 days a week (i.e. a security guard/s).				
<i>Fire Management</i>					
50	The Applicant shall: (a) implement suitable measures to minimise the risk of fire on-site; (b) extinguish any fires on-site promptly; and (c) maintain adequate fire-fighting capacity on-site.	- Site visit on 12/09/22 - Interview with Crawfords 12/09/22 - Greenice 2019, Independent Hazard Audit	The Auditors observed fire mitigation equipment and measures during the site visit. Crawfords have advised there have been no fires to have reportedly occurred on site. The Hazardous Audit Report undertaken in 2019 also reported that there were no issues of concern which were observed or raised in associated to fire safety. The Auditors have no reason to believe this condition has not been met.	Compliant	
Schedule 4					
<i>Environmental Management</i>					
<i>Construction Environmental Management Plan</i>					
1	The Applicant shall prepare and implement a Construction Environmental Management Plan for the development to the satisfaction of the Director-General. The Plan must: (a) be prepared by a suitably qualified and experienced person; (b) be approved by the Director-General prior to the commencement of construction;			Not triggered	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(c) identify the statutory approvals that apply to the development; (d) consolidate all relevant management plans and monitoring programs required in the conditions of this consent and committed to in the EIS; (e) outline all environmental management practices and procedures to be followed during construction and demolition works associated with the development; (f) describe all activities to be undertaken on the site during construction of the development, including a clear indication of construction stages; (g) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; (h) describe of the roles and responsibilities for all relevant employees involved in construction and demolition works associated with the development; and (i) include arrangements for community consultation and				

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	complaints handling procedures during construction and demolition.				
Operational Management Plan					
2	The Applicant shall prepare and implement an Environmental Management Plan for the development to the satisfaction of the Director-General. This Plan must: (a) be prepared by a suitably qualified and experienced person; (b) be approved by the Director-General prior to the commencement of operation; (c) provide the strategic context for environmental management of the development; (d) identify the statutory requirements that apply to the development; (e) consolidate all relevant management plans and monitoring programs required in the conditions of this consent and committed to in the EIS; (f) outline the arrangements to ensure compliance with conditions of this consent for the life of the development, in particular Conditions 2, 3, 14 and 17 in Schedule 3; (g) include a review of current site environmental management practices;	• 2018 IEA • Section 6 – Action Plan, Crawfords Response • 2018 IEA	During the previous audit period, the OEMP was not considered compliant. Ramboll recommended that the OEMP be updated to reflect operations and management measures at the facility at that time. Crawfords advised following the audit that once Crawford's received feedback and/or recommendations from the Department arising from the IEA Action Plan, it was planned that the OEMP would be amended to reflect any recommendations. The OEMP was not revised as indicated in the previous IEA Action Plan or during this Audit Period, except possibly towards the end of the period. Crawfords advised that the OEMP was in the process of being revised in response to DPE's directions. A draft OEMP was not provided to the Auditors for review. Condition 2 is considered non-compliant on the basis that the OEMP was not revised following the 2018 IEA or following the direction of the Department in 2020.	Non-compliant	NC18

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	(h) based on the review required under subsection (g) of this condition, include a schedule of actions with timeframes to be implemented to improve site environmental management practices, in particular measures to improve handling of AN to minimise spillages; (i) include final details of how the environmental performance of the development would be managed and monitored; (j) describe the procedures that would be implemented to: keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the development; respond to any non-compliance; manage cumulative impacts; respond to emergencies; and (k) describe the role, responsibility, authority, and accountability of all the key personnel involved in environmental management of the development.		Recommendation: Review and revise the OEMP to address recommendations of this Audit, as well as any outstanding recommendations from the 2018 IEA and the Department's directions. Submit the revised OEMP to DPE for approval.		
<i>Environmental Reporting & Auditing</i>					
<i>Incident</i>					

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
3	Upon detecting an exceedance of the limits/performance criteria in this consent or the occurrence of an incident that causes (or may cause) material harm to the environment, the Applicant shall immediately (or as soon as practical thereafter) notify the Department and other relevant agencies of the exceedance/ incident. Within 7 days of the date of the incident, the Applicant shall provide the Director-General and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	- Interview with Crawfords on 12/09/22 - Crawfords, Incident Register & Compliance Action Tracker(AutoRecovered).xlsx	Crawfords advised that there had been no notifiable incidents at the site. A review of the incident register supports Crawfords view. However, Schedule 4, Condition 3 requires that Crawfords notify DPE and other relevant agencies "<i>upon detecting an exceedance of the limits / performance criteria in this consent</i>". Exceedances of stormwater and dust criteria have occurred that have not been notified to DPE. Therefore, Condition 3 is considered non-compliant. Recommendation: In addition to incidents, ensure that an exceedance of a limit / performance criterion in this consent is notified to DPE and other relevant agencies of the exceedance immediately (or as soon as practical thereafter). Submit a written detailed report within 7 days of the exceedance (or incident).	Non-compliant	NC19
<i>Independent Environmental Audit</i>					
4	Within one (1) year of the commencement of operations of the development, and every three (3) years thereafter, or as otherwise agreed by the Director-General, the Applicant shall commission and pay the	- Ramboll, IEA, Crawfords Ammonium Nitrate Facility, 09/09/15 (2015 IEA) 2018 IEA - Interview with Crawfords on 12/09/22	The Auditors understand that the site commenced operations under SSD-5119 on 27/05/14. The first IEA was conducted in 2015 with site visits on 26/05/15 and 04/06/15.	Non-compliant	NC20

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	full cost of an Independent Environmental Audit of the development. This audit must: (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Director-General; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and assess whether it is complying with the relevant requirements in this consent and any relevant EPL (including any plan or program required under these consents); (d) review the adequacy of any plans or programs required under these consents; and, if appropriate; (e) recommend measures or actions to improve the environmental performance of the development, and/or any plan or program required under these consents. <i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Director-General.</i>		The second and previous IEA was conducted in 2018 with two sites visits on 10/05/18 and 26/07/18, which was considered to be within the 3-year timeframe for ongoing audits, based on site visit dates. It is considered that this Audit and site visit was due to be conducted before 27/05/21. Therefore, Condition 4 is considered non-compliant. Review of the 2018 IEA Report indicates that it was conducted generally in accordance with the Condition 4 requirements The Auditors have sought to consult DPE, EPA, Council and DPE Water during this Audit as discussed in Section 3.5 of the IEA Report. Recommendation: Ensure that future IEAs are conducted every 3 years. The next IEA site visit should be conducted by 27/05/24 or as otherwise agreed with DPE.		
5	Within 6 weeks of completing any Independent Environmental Audit, or	DPE email to Crawfords, Crawfords Ammonium	DPE advised on 08/08/22 that the 2018 IEA was completed on 26/07/18 and	Compliant	

Table A: Compliance with SSD-5119					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	as otherwise agreed by the Director-General, the Applicant shall submit a copy of the audit report to the Director-General, together with its response to any recommendations contained in the audit report.	Nitrate Storage and Distribution Facility, Sandgate (SSD-5119) – Site Inspection Follow Up, 08/08/22	submitted on 29/08/18, which was within the required 6 week timeframe. An 'Action Plan', which at the time was considered to be the Applicant's response to recommendations with a timeframe for completion, was incorporated into the 2018 IEA Report and, therefore, submitted to the Department with the report. Condition 5 is considered compliant on the basis of the available information.		

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
<i>1 Administrative Conditions</i>					
<i>A1 What the licence authorities and regulates</i>					
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. Schedule Activity: Chemical storage;	Refer to Table A, Schedule 2, Condition 7	Refer to the findings in Table A, Schedule 2, Condition 7.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	Fee Based Activity: General chemical storage; Scale: > 5000 - 100000 kL stored.				
A1.2	The licensee must not store at the premises at any time more than 13,500 tonnes of any chemical substance, including but not limited to ammonium nitrate, classified as a dangerous good under the <i>Australian Code for the Transport of Dangerous Goods by Road & Rail</i> .	Refer to Table A, Schedule 2, Condition 7	Refer to the findings in Table A, Schedule 2, Condition 7. Stock counts of dangerous goods other than than AN were not readily available. However, based on the site visit and discussion with facility personnel, the Auditors were satisfied that the storage limit for dangerous goods, including but not limited to AN, was unlikely to have been exceeded during the Audit Period. The Auditor have no reason to believe that Crawfords have not complied with Condition A1.2 during the Audit period.	Compliant	
<i>A2 Premises or plant to which this licence applies</i>					
A2.1	The licence applies to the following premises CRAWFORDS FREIGHTLINES 158 OLD MAITLAND ROAD SANDGATE, NSW 2304 LOT 12 DP 625053 PREMISES SHOWN BOUNDED BY A RED OUTLINE ON THE PLAN TITLED "PLAN SHOWING LOCATION OF DISCHARGE POINTS AND MONITORING WELLS AT CRAWFORDS FREIGHTLINES FACILITY SANDGATE,	- Interview with Crawfords on 12/09/22 - Site visit on 12/09/22	The plan titled "PLAN SHOWING LOCATION OF DISCHARGE POINTS AND MONITORING WELLS AT CRAWFORDS FREIGHTLINES FACILITY SANDGATE, NSW" was not provided to the Auditors. However, we understand the boundary for the premises and EPA discharge and monitoring points have not changed during the Audit Period. The Auditor have no reason to believe that Crawfords have not complied with Condition A2.1 during the Audit period.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	NSW", PREPARED BY DAVID CANT SURVEYORS, DATED 10/12/2015 ("THE PLAN")(EPA REFERENCE DOC17/235604-01).				
A3 Information supplied to the EPA					
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	- Interview with Crawfords on 12/09/22 - Site visit on 12/09/22	The Auditor have no reason to believe that Crawfords have not complied with Condition A3.1 during the Audit period.	Compliant	
2 Discharges to Air and Water and Applications to Land					
P1 Location of monitoring/discharge points and areas					
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	2018 IEA - Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	The Auditor verified the location of the monitoring points against the given table and "The Plan" during the previous audit period.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			No changes have occurred to the monitoring points during this Audit Period.		
P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <i>Table not listed. Refer to Environmental Protection Licence in Appendix B.</i> Note: "The Plan" referred to above is described in Condition A2.		Refer to Condition P1.1 above		
3 Limit Conditions					
L1 Pollution of waters					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with <i>section 120 of the Protection of the Environment Operations Act 1997</i> .	Annual Returns – 2018/19, 2019/20, 2020/21, 2021/22	Assessment of stormwater discharge concentrations against the stormwater quality assessment criteria in the 2013 OEMP indicate that they had been exceeded. Therefore. Condition L1.1 is non-compliant. Recommendation: Refer to the recommendations for Conditions 22 and 23, Schedule 3, SSD-5119 in Table A.	Non-compliant	NC21
L2 Waste					
L2.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment,	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	The Auditors observed various equipment and materials stored within the yard north of Shed C. Products included old transformers which	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	• Crawfords email to Ramboll, L2.1 Waste, 10/11/22 • Crawfords email to Ramboll, Transformers Table B L2.1 Waste, 11/11/22, with attached: ○ Detailed Description of Lot/Sale items	Crawfords advised have been brought onto the site. They <i>"were delivered to be packed into containers and delivered to the customer. However, they did not fit into the containers provided & we are awaiting further information/ directions from the customer"</i>. At least one of the transformers had been marked as <i>"Drained 16.6.22"</i> indicating that they no long contained oil. Crawfords further advised that the transformers <i>"are not waste – they are in transit from Newstan Coal Mine to a client and couldn't fit into the assigned trailer with all the other items on this list"</i>. The Detailed Description of items indicate that <i>"internal oil has been removed"</i> or <i>"oil will be removed before collection"</i>. The Auditors consider this condition is compliant however consider the temporary storage of equipment that could be considered as waste to be potentially non-compliant and should be reviewed. Recommendation: Review internal procedures regarding the transfer and temporary storage of		

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			equipment onsite to ensure that waste materials are not received at site.		
L2.2	This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if those activities require an environment protection licence.		The licence does not relate to the storage, treatment, processing, reprocessing or disposal of waste at the premises.	Not triggered	
<i>L3 Noise Limits</i>					
L3.1	Where a noise limit has not been prescribed, all operations and activities occurring on the premises must be conducted in a manner that will not cause offensive noise.	- Site visit on 12/09/22 - Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	The Auditors during the site inspection did not note activities on the site that would cause offensive noise to receptors. Crawfords advised there had been no noise complaints during this Audit Period and no noise complaints were recorded in the Annual Returns.	Compliant	
L3.2	Noise generated at the premises must not exceed the noise limits presented in the table below. The noise limits in the table below represent the noise contribution from the premises. The locations referred to in the table are identified as shown in Figure 5.21 of the "Ammonium Nitrate Storage and Distribution Facility EIS for Crawfords Freightlines" prepared by ERM dated December 2012. <i>Table not listed. Refer to Environmental Protection Licence in Appendix B.</i>	- Interview with Crawfords on 12/09/22 - Annual Return – 2018/19, 2019/20, 2020/21, 2021/22 - Crawfords, Incident Register & Compliance Action Tracker(AutoRecovered).xlsx	No noise monitoring has been undertaken during the Audit Period. No noise complaints were recorded in the Annual Returns or Incident Register & Compliance Action Tracker and therefore no noise monitoring was required to be conducted.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
L3.3	The noise limits set out in the Noise Limits table above apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions. For the purposes of this condition: d) Data recorded by a representative meteorological station must be used to determine meteorological conditions; and e) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part E4 of Appendix E to the NSW Industrial Noise Policy.	Refer to Evidence for Condition L3.2	No noise monitoring has been undertaken at the site during the Audit Period.	Compliant	
L3.4	Noise from the premises is to be measured or computed at the most noise-affected point at the receptors listed in the Noise Limits table above. a) with the Leq(15 minute) noise limits in the Noise Limits table, the	Refer to Evidence for Condition L3.2	No noise monitoring has been undertaken at the site during the Audit Period.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	noise measurement equipment must be located: i) approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or ii) within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable iii) within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) with the LA1 (1 minute) noise limits in the Noise Limits table, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in the Noise Limits table, the noise measurement equipment must be located: i) at the most affected point at a location where there is no dwelling at the location; or ii) at the most affected point within an area at a location prescribed by part (a) or part (b) of this condition.				

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	For the purpose of noise measurement required for this condition, the LAeq noise level must be measured or computed for the required period (i.e. 15 minutes or full day, evening or night) using "FAST" response on the sound level meter. Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternate means of determining compliance (see Chapter 11 of the NSW Industrial Noise Policy). Note: A non-compliance of the Noise Limits table will still occur where noise generated from the premises in excess of the appropriate limit is measured: i) at a location other than an area prescribed in part (a) and part (b); and/or ii) at a point other than the most affected point at a location.				
L3.5	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must	Refer to Evidence for Condition L3.2	No noise monitoring has been undertaken at the site during the Audit Period.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.				
L3.6	Definitions: • NSW Industrial Noise Policy - the document entitled "New South Wales Industrial Noise Policy" published by the Environment Protection Authority in January 2000. • Noise - sound pressure levels for the purposes of condition L3.1 to L3.5.	• Refer to Evidence for Condition L3.2	No noise monitoring has been undertaken at the site during the Audit Period.	Compliant	
<i>L4 Hours of Operation</i>					
L4.1	Standard construction hours Unless otherwise specified by any other condition of this licence, all construction activities are: a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays.	• Interview with Crawfords on 12/09/22 • Allshelter 2019, Shelter Assembly CATA1412A	No construction has occurred since the 2015 audit. A Shelter was installed during the Audit Period. The Auditors have not sighted timesheets for the construction of the Shelter. However, the Auditors have no reason to believe that the Shelter was not installed in accordance with Condition L4.1 requirements.	Compliant	
<i>L5 Potentially offensive odours</i>					
L5.1	No condition of this licence identifies a potentially offensive odour for the purposes of section 129 of the Protection of the Environment Operations Act 1997.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22 • Crawfords, Incident Register & Compliance Action	No odour was observed during the site visit. No odour complaints are recorded in the Incident Register & Compliance Action Tracker or Annual Returns.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.</i>	Tracker(AutoRecovered).xls x • Annual Return – 2018/19, 2019/20, 2020/21, 2021/22			
4 Operating Conditions					
O1 Activities must be carried out in a competent manner					
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	• Interview with Crawfords on 12/09/22 • Site visit on 12/09/22	Based on the site visit observations, discussions with Crawfords personnel and available documentation, the Auditors consider that Crawfords are generally meeting the requirements of Condition O1.1. Sheds A and B were tidy and bulka-bags were stacked in an orderly manner within delineated areas. The Auditors observed personnel sweeping up and collecting AN prill in Shed B. Daily stock counts were being conducted to demonstrate compliance with limits. Waste management was considered generally compliant.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			However, it is the case that environmental aspects and impacts of site operations and management can be improved in relation to chemical bunding, bund maintenance, water management, dust management and storage of miscellaneous materials onsite. Recommendations have been made accordingly in Tables A and B.		
<i>O2 Maintenance of plant and equipment</i>					
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Refer to Table B, Schedule 2, Condition 12 Evidence	Condition O2.1 is a duplication of Condition 12, Schedule 2, SSD-5119. Refer to Table A for the findings and recommendations for Condition 12, Schedule 2, SSD-5119, which was found to be non-compliant. Condition O2.1 has not been counted as a new non-compliance to avoid duplication of findings and recommendations.	Non-compliant	Refer to NC5
<i>O3 Dust</i>					
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22 2013 OEMP	The Auditors observed the generation of dust from vehicle movements in areas where the surface was unsealed within the yard north of Shed C and south of Shed D. Crawfords advised maintenance staff employed by the site owner are required to maintain the site surface.	Non-compliant	Refer to NC15

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			A water cart was operational during the site visit. Crawfords have advised the water cart is used when required. In order to avoid duplication of findings, refer to the recommendation for Schedule 3, Condition 32.		
O3.2	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	• Site visit on 12/09/22 • Site Induction record • Interview with Crawfords on 12/09/22 • 2013 OEMP	Speed limits at the site is restricted to: - 10 km/h on the driveways All trucks are covered prior to movement on site. A water cart was operational during the site visit. Crawfords have advised the wart cart is used when required. The site inspection identified the emissions of dust in areas where the surface was unsealed within the yard north of Shed C and south of Shed D. The site operations appear to be undertaking activities generally in accordance with the OEMP however dust is continuing to be emitted. On the basis of the above it is considered that the operations and activities are being carried out in accordance with the OEMP and therefore complaint.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Recommendation: A review of the dust mitigation measures to be undertaken as part of the OEMP review.		
O3.3	Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading.	Site visit on 12/09/22	The Auditor noted during the site inspection that all vehicles were appropriated covered prior to entering or leaving the site.	Compliant	
<i>O4 Emergency response</i>					
O4.1	The licensee must maintain, and implement as necessary, a current emergency response plan for the premises. The licensee must keep the emergency response plan on the premises at all times. The emergency response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. If a current emergency response plan does not exist at the date on which this condition is attached to the licence, the licensee must develop an emergency response plan within three months of that date.	- Crawfords, Site Emergency Plan, Crawfords Freightlines Sandgate Site, Revision 17, 03/05/22 - Crawfords, Pollution Incident Response Management Plan, Version 2, October 2021	The Site Emergency Plan was last reviewed in May 2022. The site also has a Pollution Incident Response Management Plan that was last issued in October 2021 (Version 2) and was due for review on 17/10/22. Facility personnel advised that there have been no notifiable incidents that warranted implementation of the emergency plan. The Site Emergency Plan includes flood response.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	<i>Note: The Emergency Response Plan must also deal with flooding.</i>				
<i>O5 Processes and management</i>					
O5.1	All above ground tanks containing material that is likely to cause environmental harm must be bunded or have an alternative spill containment system in place.	Site visit on 12/09/22	The 64,600 L Diesel aboveground storage tank (AST) is self-bunded (i.e. double-skinned) and the Quarantine Wastewater AST is bunded.	Compliant	
O5.2	Bunds must: a) have walls and floors constructed of impervious materials; b) be of sufficient capacity to contain 110% of the volume of the tank (or 110% volume of the largest tank where a group of tanks are installed); c) have floors graded to a collection sump; and d) not have a drain valve incorporated in the bund structure, or be constructed and operated in a manner that achieves the same environmental outcome.		Where bunds were in use, they generally met the requirements of Condition O5.2. However, it is considered that pallet bunds used to store IBCs (refer to Table A, Schedule 3, Condition 12) are not best practice for the permanent storage of IBCs and drums (e.g. waste oil in the Workshop in Shed D) and there was evidence of spills outside pallet bunds. The Quarantine Wastewater AST bund appeared to be almost half full of wastewater and therefore, may not have sufficient capacity in the event of a leak if the bund already contains wastewater. Recommendation: Consider installing a properly constructed bund(s) in the Workshop and elsewhere as considered	Non-compliant	NC22

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			necessary that meets the requirements of Condition O5.2. Ensure that bunds are inspected and maintained in order that the bunds has sufficient capacity in accordance with Condition O5.2 requirements.		
<i>O6 Waste Management</i>					
O6.1	The licensee must ensure that any liquid and/or non-liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	• Site interview with Crawfords on 12/09/22 • JJ's Waste & Recycling Waste Invoice dated 30/06/22 • Singleton Tyre & Battery Centre Waste Invoice dated 22/08/22 • K&S Recyclists Pty Ltd Invoice No. INV-0137 dated 03/08/22 • NSW EPA Online Waste Tracking CA no. 2C00188966 dated 02/09/22 • NSW EPA Online Waste Tracking CA no. 2C00188967 dated 02/09/22 • JR Richards & Sons Waste Invoice dated 30/09/22	General waste and recyclable waste are separated and taken off site by a licensed contractor (JR Richards & Sons Pty Ltd). Waste disposal receipts were sighted by the Auditors. Truck types are also separated and taken off site by a licensed contractor (Singleton Tyre & Battery Centre). Waste disposal receipts were sighted by the Auditors. Waste oil is collected and disposed of by a licensed contractor (JJ's Waste & Recycling Pty Ltd). Waste disposal receipts were sighted by the Auditors. AN packaging (i.e. bags) are taken offsite separately and disposed of by K&S Recyclists Pty Ltd. Waste disposal documentation was sighted by the Auditors.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			Crawford advised any loose AN swept up during decanting is collected and mixed with water in an IBC for offsite personal irrigation purposes. During the previous audit period, spent alumina was previously stored onsite. Crawfords have advised this operation has ceased.		
06.2	The licensee must ensure that waste identified for recycling is stored separately from other waste.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	The Auditors sighted segregation of bins for paper, plastics and general waste during the site visit.	Compliant	
<i>07 Other operating conditions</i>					
07.1	The licensee must ensure that activities are conducted in an environmentally satisfactory manner. So as to minimise and prevent the pollution of air and water the licensee must: (a) Ensure that vehicles or containers prior to leaving the premises are clean and sealed in a manner that will not cause materials or wastes used in conducting the activities at the premises to be tracked, thrown from, blown, fall, or cast from any vehicle or container onto a public road. (b) The licensee must have in place and implement procedures to ensure that vehicles and containers exiting the premises are in a condition to	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22 2013 OEMP	Section 5.4.5 of the 2013 OEMP sets out mitigation measures for minimising air and water emissions including installation of a wheel wash, which was observed in use during the site visit. An AN truck was observed departing site that appeared to be sealed and not tracking AN offsite.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	ensure that materials are not tracked, thrown, blown, fall or cast onto a public road.				
07.2	The licensee must ensure that methyl bromide is not used for any purpose on the premises.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	Facility personnel advised that timber fumigation reportedly ceased in 2020 when the timber treatment operation transferred to Werris Creek. At least one pallet of nine Methyl Bromide (Toxic Gas, UN1062) cylinders was observed in the northern container storage area along with other miscellaneous waste materials awaiting offsite disposal. They had reportedly been left there by the former fumigation contractor. On the basis of the available information, it cannot be verified that methyl bromide was not in use during the course of the Audit Period (27/07/18 to 12/09/22) and therefore, this condition is considered non-compliant. Recommendation: Remove methyl bromide cylinders from the site. Ensure that methyl bromide is not used for any purpose at the site.	Non-compliant	NC23
07.3	The licensee must ensure that wood preservation activities are not conducted on the premises.		Wood fumigation activities were carried out onsite up until 2020, which is therefore, considered non-compliant. No recommendation is	Non-compliant	NC24

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			made as wood fumigation activities have since ceased.		
<i>5 Monitoring and Recording Conditions</i>					
<i>M1 Monitoring records</i>					
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Annual Return – 2018/19, 2019/20, 2020/21, 2021/22	The monitoring results were retained and submitted in the annual returns for 2018/19; 2019/20; 2020/21 and 2021/22.	Compliant	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	- Sighted stormwater basin pump inspection/operation log dated 22/12/15 – 18/04/16 - Chain of Custody records dated 20/10/17 and 29/06/21 - Interview with Crawfords on 12/09/22 - Site visit on 12/09/22	Crawfords advised all monitoring records have been kept onsite. The Auditors sighted the monitoring record folders and records dating back to 2015. The Auditors consider this condition has been met.	Compliant	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and	- Sighted stormwater basin pump inspection/operation log - Interview with Crawfords on 12/09/22 - Site visit on 12/09/22	The Auditors sighted records of samples being collected in accordance with the requirements of the consent condition.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	d) the name of the person who collected the sample.				
<i>M2 Requirement to monitor concentration of pollutants discharged</i>					
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	• Groundwater monitoring.pdf • 2019-2020 Groundwater Monitoring Data.pdf • 2020-2021 Groundwater Monitoring Data .pdf • Annual Return Data 2022 DP & MW.xlsx • 2020 EPA Annual Return Sandgate.pdf • 2021 EPA Annual Return Sandgate.pdf • COA 30 July 2020 (ES2026156_0_COA) (002).pdf • Annual Return Sandgate 08.09.2022 ARApplicationSummary_10883.pdf • 685761_COC.pdf • 685761_summary.pdf • 685761-W_report.pdf • ES2026156_0_COA.pdf • ES2026156_COC.pdf • ES2027636_0_COA.pdf • ES2027636_COC.pdf • Sampling sheets.pdf	Documentation was provided to demonstrate compliance with Condition M2.1 requirements.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
M2.2	Water and/ or Land Monitoring Requirement. <i>Table not listed. Refer to Environmental Protection Licence in Appendix B.</i>	Refer to Condition M2.1 Evidence	Documentation was provided to demonstrate compliance with Condition M2.2 requirements.	Compliant	
<i>M3 Testing methods – concentration limits</i>					
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Refer to Condition M2.1 Evidence	Documentation was provided to demonstrate compliance with Condition M2.3 requirements.	Compliant	
<i>M4 Recording of pollution complaints</i>					
M4.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	- Interview with Crawfords on 12/09/22 - Crawfords, Incident Register & Compliance Action Tracker	The site has a complaints hotline and maintains an incident and non-conformance register. The Auditors have sighted the register which includes incidents, non-conformances and safety notices .	Compliant	
M4.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made;	Crawfords, Incident Register & Compliance Action Tracker	Crawfords have advised that no complaints have been recorded onsite. The Auditors have sighted the Incident and Compliance Action Tracker however could not identify sections in the tracker where the time of the	Non-compliant	NC25

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.		compliant, or the method by which the complaint was made to be able could be populated if a compliant were to occur. It is therefore considered this condition is non-compliant. Recommendation: Review and update the Incident Register & Compliance Action Tracker to include the required details in accordance with Condition M4.2.		
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Crawfords, Incident Register & Compliance Action Tracker	The Auditors have sighted the Incident Register & Compliance Action Tracker. The information in the register can be seen dating back to 2018. It is therefore considered this condition is compliant.	Compliant	
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.			Not triggered	
<i>M5 Telephone complaints line</i>					
M5.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	Facility personnel advised that they receive community complaints, mainly in relation to vehicles issues. A 'Safe Driving Contact' telephone line, 1800 218 615, reportedly diverts to the MHF Coordinator's mobile. Other telephone contact numbers are provided for contacting the site for any reason.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
M5.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22 https://www.crawfordsfreightlines.com.au/contact/ https://www.facebook.com/crawfordsfreightlines/	Details for contacting Crawfords are provided on their website and their Facebook (FB) page. The contact telephone numbers (website: (02) 4032 7260, FB (02) 4032 7270) are not advertised as a telephone complaints line. The Crawfords website also provides a 'Safe Driving Contact' telephone line, 1800 218 615, which currently diverts to the MHF Coordinator's mobile. No signage was observed advertising a telephone complaints line for Crawfords at the entrance to the site. Recommendation: Notify the public of the telephone number that can be used to make a complaint, not necessarily related to safe driving issues. Erect a sign at the site entrance notifying the public of a telephone number for community complaints in relation to site activities or vehicle and mobile plant activities.	Compliant	
M5.3	The preceding two conditions do not apply until 1 month the date of the issue of this licence.			Not triggered	
M5.4	The licensee must nominate to the EPA a representative of the company that is available at all times and is	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22	Facility personnel advised that there has been no change during the Audit Period to the nominated person or	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	capable of providing immediate assistance or response during emergencies or any other incidents at the premises. The name of the nominated representative and their contact details, including their telephone number, must be current at all times. The nomination and contact details must be provided to the EPA's Regional Manager - Hunter at PO Box 488G, Newcastle NSW 2300. Note: This condition does not apply until two (2) weeks after the date of issue of the licence.		their contact details for the purpose of EPA contact.		
6 Reporting Conditions					
R1 Annual return documents					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1) a Statement of Compliance; 2) a Monitoring and Complaints Summary; 3) a Statement of Compliance – Licence Conditions; 4) a Statement of Compliance – Load based Fee; 5) a Statement of Compliance – Requirement to Prepare Pollution Incident Response Management Plan;	• 2018-2019 Annual Return Summary_4596.pdf • 2019-2020 EPA Annual Return.pdf • 2020 EPA Annual Return Sandgate.pdf • 2021 EPA Annual Return Sandgate.pdf • 2021.pdf	The ARs were completed electronically in the approved EPA form.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	6) a Statement of Compliance – Requirement to Publish Pollution Monitoring Data; and 7) a Statement of Compliance – Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.				
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	EPA, Environment & Heritage POEO Licences, Application and Notice Detail, Licence summary, 08/11/22	Annual Returns have been submitted each year during the reporting period.	Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the			Not triggered	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.				
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.			Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	EPA, Environment & Heritage POEO Licences, Application and Notice Detail, Licence summary, 08/11/22	Annual Returns (ARs) are required to be submitted by 15 September. The 2017/2018 and 2021/2022 ARs were received by the EPA before 15 September. However, the 2018/2019, 2019/2020 and 2020/2021 ARs were received by the EPA after 15 September. Recommendation: Review the process for preparing and submitting Annual Returns to ensure	Non-compliant	NC26

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
			that they are submitted within the 60-day timeframe.		
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	2018-2019 Annual Return Summary_4596.pdf 2019-2020 EPA Annual Return.pdf 2020 EPA Annual Return Sandgate.pdf 2021 EPA Annual Return Sandgate.pdf	ARs for the last 4 years were available.	Compliant	
R1.7	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	2018-2019 Annual Return Summary_4596.pdf 2019-2020 EPA Annual Return.pdf 2020 EPA Annual Return Sandgate.pdf 2021 EPA Annual Return Sandgate.pdf 2021.pdf	The available copies of the ARs were signed electronically by the Managing Director, Mr Peter Crawford.	Compliant	
R2 Notification of environmental harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555. Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.			Not triggered	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.			Not triggered	
<i>R3 Written Report</i>					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.			Not triggered	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.			Not triggered	
R3.3	The request may require a report which includes any or all of the following information:			Not triggered	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.				
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide			Not triggered	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	such further details to the EPA within the time specified in the request.				
<i>7 General Conditions</i>					
<i>G1 Copy of licence kept at the premises or plant</i>					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site visit on 12/09/22	A copy of the EPL Licence 20295 is kept on-site	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.			Not triggered	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site visit on 12/09/22	A copy of the EPL Licence 20295 is kept on-site	Compliant	
<i>G2 Contact number for incidents and responsible employees</i>					
G2.1	The licensee must provide the EPA with up to date contact details to enable the EPA: a) to contact either the licensee or a representative of the licensee who can respond at all times to incidents relating to the premises, and b) to contact the licensee's senior employees or agents authorised at all times to: i) speak on behalf of the licensee, and ii) provide any information or document required under licence.	Interview with Crawfords on 12/09/22	Assigned to Peter Crawford – General Manager.	Compliant	

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
G2.2	The contact details required by Condition G2.1 above must include: c) the full name and title of the authorised representative and the scope of their respective authorisations; and the direct telephone number, mobile number, page number, fax number, email address and postal address for contacting each authorised representative.	2018 IEA	This Condition was assessed during the previous audit period. No updates have been made during this Audit Period.	Compliant	
G2.3	The licensee is to inform the EPA in writing of the appointment of any subsequent contact persons, or changes to the person's contact details as soon as practicable and in any event within fourteen days of the appointment or changes.			Not triggered	
<i>G3 Other general conditions</i>					
G3.1	Completed Programs <i>Table not listed. Refer to Environmental Protection Licence in Appendix B.</i>			Not triggered	
<i>8 Pollution Studies and Reduction Programs</i>					
<i>U1 PRP 2 – Storm water Upgrades</i>					
U1.1	Sealing of Roadways The licensee must implement a staged construction programme for internal road sealing works (paving works) to prevent and minimise the generation and emission of dust, and	- Site visit on 12/09/22 - Interview with Crawfords on 12/09/22 - Email from Crawfords to EPA dated 08/09/22, Ponds – Discussion from Friday	In the previous audit period, a copy of a 'Progress of Pollution Reduction Program' Letter addressed to the EPA dated 14 May 2018 was sighted by the Auditors stating the completion of material testing and pavement design,	Non-compliant	NC27

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	pollutant concentrations in surface water runoff. The construction programme must: • By 5pm, 31 January 2018 – Have material testing and pavement designs completed. • By 5pm, 31 January 2018 – Have received quotations for works. • By 5pm, 31 January 2018 – Award paving contracts for construction works to commence. Phase 1 – Paving works – Southern half of Rail siding Corridor (identified on map supplied to EPA on 22/11/2017, EPA reference DOC17/576259). By 5pm 30 June 2018, the Southern Half of the rail siding corridor must have its paving works completed. By 5pm 13 July 2018, a progress report must be supplied to the EPA, including but not limited to a description of works completed and areas where these works have been completed. Phase 2 – Paving works – Northern half of rail siding corridor (identified on map supplied to EPA on		quotations received and awarding paving contracts for construction completed. However, the completion of Phase 1 was not able to be achieved by 30 June 2018 and reported. During the site inspection on 26th July 2018, the Auditors sighted the commencement of the pavement works for the Southern and Northern Half of the rail sliding corridor which reportedly started on the 26 July 2018. During this Audit Period, Crawfords have advised all paving works to have been completed with the area surrounding Shed C finished earlier in the year (August 2022) (Phase 3). A recent email correspondence was provided detailing the completed of Phase 3 paving works which were not finished by June 2020 in accordance with the consent condition. No additional documentation has been provided to confirm when Phase 2 paving works have been completed or the reports required to be supplied to the EPA of the description of the Phase 1-3 works completed.		

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	22/11/2017, EPA reference DOC17/576259). By 5pm, 30 June 2019, the Northern half of the rail siding corridor must have its paving works completed. By 5pm, 14 July 2019, progress report must be supplied to the EPA, including but not limited to a description of works completed and areas where these works have been completed. Phase 3 – Paving Works – Area surrounding C shed (identified on map supplied to EPA on 22/11/2017, EPA reference DOC17/576259). By 5pm, 30 June 2020, the area surrounding C shed must have its paving works completed. By 5pm, 14 July 2020, a progress report is to be supplied to the EPA, including but not limited to a description of works completed and areas where these works have been completed.		Recommendation: If not already completed, reports of the paving works and reports to be submitted to the EPA.		

Table B: Compliance with EPL 20295					
APPROVAL (ID)	REQUIREMENT	EVIDENCE COLLECTED	INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS	COMPLIANCE STATUS	NC #
	By 5pm, 14 July 2021, a report must be supplied to the EPA, including but not limited to a description of works completed and areas where these works have been completed. This report must include a plan showing all areas sealed as a result of this PRP. The above required reports must be provided to the EPA's Director – Hunter at PO Box 488G, Newcastle NSW 2300, or emailed to hunter.region@epa.nsw.gov.au				

APPENDIX B AUDIT TEAM

Department of Planning and Environment

Mr Robert Tracey
HSSE and Compliance Manager
Crawfords Freightlines Pty Ltd

Via Email only: rtracey@crawfordsfreightlines.com.au

31/08/2022

Dear Mr Tracey

**Crawfords Ammonium Nitrate Storage and Distribution Facility, Sandgate (SSD 5119)
Proposed 2022 IEA Audit Team**

I refer to your request (SSD-5119-PA-2) for the Planning Secretary's approval of suitably qualified persons to prepare the 2022 Independent Environmental Audit (IEA) for the Ammonium Nitrate Storage and Distribution Facility at Sandgate (the site), as required by Schedule 4, Condition 4 of development consent SSD-5119, as modified (the consent).

The Department of Planning and Environment (the department) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Planning Secretary approves the appointment of Ramboll Australia Pty Ltd to prepare the 2022 IEA.

In accordance with Schedule 4, Condition 4 of the consent and the Independent Audit Post Approval Requirements, the Planning Secretary has agreed to the following audit team:

- Ms Victoria Sedwick – Lead Auditor;
- Ms Emily Rowe – Auditor;
- Ms Vanessa Perkins – Auditor;
- Mr David Ford – Audit support; and
- Mr Shaun Taylor – Audit support.

The department notes that some of the Exemplar Global certifications for the above auditors will expire before the final audit for this project has been completed. Please note that this approval of the above audit team is conditional upon them maintaining certification as an auditor with a relevant industry body.

The IEA period shall be from 26 July 2018 to the last IEA inspection date (September 2022).

The Planning Secretary requests, under Schedule 2, Condition 4, that the IEA is prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Further, the Planning Secretary also requests, under Schedule 2, Condition 4 of the consent, that a copy of the IEA report be submitted to the department via the Major Projects Portal, together with a response to any auditor recommendations (RAR), within 6 weeks of the audit inspection date, or as otherwise agreed by the Planning Secretary. Please note that the RAR must include target dates (DD/MM/YYYY) for implementation.

Please ensure this correspondence is appended to the IEA Report.

Should you wish to discuss the matter further, please contact Ms Ann Hagerthy, Senior Compliance Officer, on (02) 6575 3407 or compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters". The signature is written in a cursive, flowing style.

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

APPENDIX C

INDEPENDENT AUDIT DECLARATION FORM

INDEPENDENT AUDIT DECLARATION FORM

Project Name:	Crawfords Warehouse Facility
Consent Number:	SSD 5119
Description of Project:	Crawfords Ammonium Nitrate Storage and Distribution Facility
Project Address:	158 Old Maitland Road, Sandgate (Lot 12 DO 625053)
Proponent:	Crawfords Freightlines Pty Ltd
Title of Audit:	2022 Independent Environmental Audit, Crawfords Warehouse Facility
Date:	17 November 2022

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the Audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- the findings of the Audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the Audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this Audit except as otherwise declared to the Department prior to the Audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes :

- Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Lead Auditor:	Victoria Sedwick
Signature:	
Qualification:	Exemplar Global Lead Auditor Certificate No.13180
Company:	Ramboll Australia Pty Ltd
Company Address:	PO Box 560, North Sydney NSW 2060

APPENDIX D

SITE INSPECTION PHOTOGRAPHS



Photo 1: Chemical storage within northern half of Shed D. Looking to the southwest.



Photo 2: Chemical storage within northern half of Shed D, north-eastern wall. Unbundled IBCs. Restricted access to fire hose reel.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 3: Quarantine wastewater AST and oil/water separator in bund adjacent to the Shed D near the truck wash bay. Looking to the north.



Photo 4: Unbundled IBC next to the quarantine wastewater tank.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 5: Flammable liquids cabinet and an IBC on a pallet bund near the southern entrance to the Shed D Workshop. Oil spill on the floor around the bund.



Photo 6: IBCs and drums of oil on pallet bunds at northern end of the Shed D Workshop. Oil spills on the floor around the bund.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 7: Self-bunded Diesel AST located in the southern corner of the site. Looking to the east.



Photo 8: Diesel fuelling point adjacent to the rail siding. Bunding of the area was cracked. Looking to the west.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 9: IBC labelled as containing Diesel located in the bund for the refuelling area.



Photo 10: IBC reused to contain Diesel that is not labelled correctly located in the bund for the refuelling area.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 11: View towards Shed A (right) and Shed B (left) and a shipping container of AN being unloaded. Looking to the south.



Photo 12: View inside Shed B from the door. Looking to the west.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 13: View inside Shed B from the door. Looking to the west.



Photo 14: View inside Shed A from the door. Looking to the west.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 15: View to the west and the AN unloading shelter, Shed A on the left.



Photo 16: AN unloading shelter with bulka-bags of AN being unloaded via conveyor into a truck. Looking to the north.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 17: Unloading of AN into a truck. Minimal dust generation.



Photo 18: Unbundled IBCs next to the AN unloading shelter. Collected AN prill is emptied into the IBC containing water on the right.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11/22
Client:	Crawfords Freightlines		



Photo 19: Chemical storage inside Shed C. Looking to the south.



Photo 20: Chemical storage inside Shed C. Looking to the south.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11/22
Client:	Crawfords Freightlines		



Photo 21: Empty AN bags adjacent to Shed C to be compacted prior to offsite disposal. Looking to the south.



Photo 22: Cylinders in the yard north of Shed C. Methyl bromide labelled on the green cylinders. Looking to the north.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 23: Entrance sign at the front of the site. Looking to the east.



Photo 24: Truck Wash Bay adjacent to Shed D. Looking to the south.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11/22
Client:	Crawfords Freightlines		



Photo 25: View to the west of the southern yard to the west of Shed D and south of Shed B. Recently sprayed by the water cart for dust suppression.



Photo 26: Waste bins south of Shed B.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 27: Unsealed yard north of Shed C along the northern boundary. Looking to the north.



Photo 28: Unbunded IBCs with unknown contents in the yard north of Shed C.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 29: Old transformer units in the in the yard north of Shed C.



Photo 30: Dust Deposition Gauge, D2, located on western boundary near the northern end of Shed C and next to the rail siding. Looking to the west.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11/22
Client:	Crawfords Freightlines		



Photo 31: View to the north looking along the rail siding beside the western site boundary. Two train fuelling points with spill kits.



Photo 32: Front end loader and forklift truck generating some dust in the southern yard. Looking to the north.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 33: Forklift truck generating some dust in the southern yard. Looking to the east with Shed D in the background.



Photo 34: Northern yard looking to the south with Shed A in the background.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 35: Southern bio retention basins with Shed B on the right. Looking to the west.



Photo 36: Central bio retention basin, which is in the process of being cleaned out. Looking to the west.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 37: Central bio retention basin with the AN unloading area to the right. Looking to the east.



Photo 38: Northern bio retention basins with the site entrance in the background behind the truck. Looking to the north.

Title:	Independent Environmental Audit, Crawfords Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11//22
Client:	Crawfords Freightlines		



Photo 39: Eastern bio retention basins with wetland on the right. Looking to the north.



Photo 40: Crawford's truck departing site containing AN with covers. Looking to the north.

Title:	Independent Environmental Audit, Crawford's Warehouse Facility	Project-No.:	Date:
Site:	Old Maitland Road, Sandgate, New South Wales	318001547	17/11/22
Client:	Crawford's Freightlines		

APPENDIX E CONSULTATION

Emily Rowe

From: Emily Rowe
Sent: Thursday, 8 September, 2022 11:24 AM
To: Ann.Hagerthy@planning.nsw.gov.au
Cc: Emily Rowe; Vanessa Perkins
Subject: Request for Consultation with the DPE, Independent Environmental Audit, Crawfords Warehouse Facility (SSD-5119 | EPL 20295)
Attachments: Ramboll_Request for DPE Consultation_SSD5119_IEA_Crawfords Warehouse Facility_8 Sep 2022.pdf

Dear Ms Hagerthy,
Please find attached a request for consultation with the Department in regards to an Independent Environmental Audit of the Crawfords Warehouse Facility at Sandgate, NSW.

Kind regards

Emily Rowe
Managing Consultant
M +61 434 180 346
erowe@ramboll.com

Ramboll Australia Pty Ltd.
ACN 095 437 442
ABN 49 095 437 442

I am located in Sydney on the land of the Tharawal people.

I value and celebrate Tharawal culture and language, and acknowledge the Tharawal people's continuing connection to the land, the sea and community. I pay respect to the Elders past, present and emerging, and through them, to all Aboriginal and Torres Strait Island Peoples.

Emily Rowe

From: Ann Hagerthy <Ann.Hagerthy@planning.nsw.gov.au>
Sent: Friday, 9 September, 2022 12:45 PM
To: Emily Rowe
Cc: Vanessa Perkins; Heidi Watters
Subject: RE: Request for Consultation with the DPE, Independent Environmental Audit, Crawfords Warehouse Facility (SSD-5119 | EPL 20295)

You don't often get email from ann.hagerthy@planning.nsw.gov.au. [Learn why this is important](#)

Hi Emily,

Thanks for your email. Can you please review the following matters with particular focus, in addition to compliance with all conditions of the consent:

Compliance with the 9 metre stack separation requirement, unless for a short period of time when the ammonium nitrate storage is at maximum capacity, in Sheds A and B, as required by Schedule 3, Condition 3 of the consent
Dust management around the site and compliance with management plans
Accessibility and fire safety of storage in Shed D
Dust management in Shed C

Many thanks,

Ann Hagerthy
Senior Compliance Officer

Energy, Industry & Compliance | Planning & Assessment
Department of Planning and Environment
T 02 6575 3407 | E ann.hagerthy@planning.nsw.gov.au
PO Box 3145 | Singleton NSW 2330

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

Our Vision: Together, we create thriving environments, communities and economies.

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Emily Rowe

From: Emily Rowe
Sent: Thursday, 8 September, 2022 12:38 PM
To: water.enquiries@dpie.nsw.gov.au
Subject: Request for Consultation with the DPE Water, Independent Environmental Audit, Crawfords Warehouse Facility (SSD-5119 | EPL 20295)
Attachments: Ramboll_Request for DPE Water Consultation_SSD5119_IEA_Crawfords Warehouse Facility_8 Sep 2022.pdf

Hello,
Please find attached a request for consultation with DPE Water in regards to an Independent Environmental Audit of the Crawfords Warehouse Facility at Sandgate, NSW.

Kind regards

Emily Rowe

Managing Consultant

M +61 434 180 346

erowe@ramboll.com

Ramboll Australia Pty Ltd.

ACN 095 437 442

ABN 49 095 437 442

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Emily Rowe

From: Timothy Baker <tim.baker@dpie.nsw.gov.au>
Sent: Monday, 12 September, 2022 9:21 AM
To: Emily Rowe
Subject: DPE Water response - Crawford's Warehouse Facility IEA input
Attachments: DPE Water response - Crawford's Warehouse Facility IEA input.pdf

You don't often get email from tim.baker@dpie.nsw.gov.au. [Learn why this is important](#)

Hi Emily,

Please see attached response providing input to the IEA for this project following your request submitted on 8 September 22.

Regards
Tim

Tim Baker
Senior Project Officer
Water Assessments
Department of Planning and Environment—Water
T 0428162097 | E tim.baker@dpie.nsw.gov.au

Our ref: OUT22/15548

Emily Rowe

Ramboll Australia Pty Ltd
Level 3, 100 Pacific Highway
North Sydney NSW 2060

erowe@ramboll.com

12 September 2022

Subject: Crawfords Warehouse Facility (SSD-5119) Independent Environmental Audit

Dear Ms Rowe

I refer to your request seeking advice from the Department of Planning and Environment – Water (the department) on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

The department understands that the scope of the audit as outlined under the development consent and the reference guideline, “*Independent Audit Post Approval Requirements (2020)*” extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
 - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
 - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance based reporting.

Department of Planning and Environment

- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments at water.assessments@dpie.nsw.gov.au

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Z. Baker".

Timothy Baker
Senior Project Officer
Water Assessments
Department of Planning and Environment: Water

Emily Rowe

From: Emily Rowe
Sent: Thursday, 8 September, 2022 11:15 AM
To: info@epa.nsw.gov.au
Cc: Emily Rowe
Subject: Request for Consultation with the EPA, Independent Environmental Audit, Crawfords Warehouse Facility (SSD-5119 | EPL 20295)
Attachments: Ramboll_Request for EPA Consultation_SSD5119_EPL 20295_IEA_Crawfords Warehouse Facility_6 Sep 2022.pdf

Hello,
Please find attached a request for consultation with the EPA in regards to an Independent Environmental Audit of the Crawfords Warehouse Facility at Sandgate, NSW.

Kind regards

Emily Rowe
Managing Consultant
M +61 434 180 346
erowe@ramboll.com

Ramboll Australia Pty Ltd.
ACN 095 437 442
ABN 49 095 437 442

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Emily Rowe

From: Environment Line <info@environment.nsw.gov.au>
Sent: Thursday, 8 September, 2022 11:15 AM
To: Emily Rowe
Subject: Thank you for your email. Your Reference Id is 01079472 (ref:_00D7F6iTix._5007F1Jy5LQ:ref)



Planning,
Industry &
Environment



Thank you for your enquiry. The Department of Planning and Environment (DPE) and the NSW Environment Protection Authority (EPA) will respond to simple requests and enquiries within 5 working days. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).

Where the EPA or DPE is not the appropriate authority to manage your report, it will be forwarded to the appropriate authority. For example, commercial noise complaints for smaller factories, backyard workshops, smoke from residential backyard fires or chimneys or dumping in public areas are the responsibility of Local Councils; loud music or patron noise from public venues are the responsibility of Liquor & Gaming NSW, rubbish on major roads and highways is the responsibility of Roads & Maritime Services. Any information provided regarding this type of pollution will be forwarded to those authorities for action.

If you do not consent to your report being forwarded, please reply to this email to advise that you would like to 'opt out' of any further action. You may also request that your details remain anonymous or confidential, however in certain circumstances this may limit our ability to deal with any complaint further. Details of our Privacy information can be found [here](#).

When sending further emails about this topic (Request for Consultation with the EPA, Independent Environmental Audit, Crawfords Warehouse Facility (SSD-5119 | EPL 20295)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:_00D7F6iTix._5007F1Jy5LQ:ref

Emily Rowe

From: Emily Rowe
Sent: Monday, 19 September, 2022 10:53 AM
To: mail@ncc.nsw.gov.au
Subject: Request for Consultation with the City of Newcastle - SSD-5119 – Independent Environmental Audit - Crawfords Warehouse Facility
Attachments: Ramboll_Request for City of Newcastle Consultation_SSD5119_IEA_Crawfords Warehouse Facility_19 Sep 2022.pdf

Attention: Development Officers

Hello,

Please find attached a request for consultation with the City of Newcastle in regards to an Independent Environmental Audit of the Crawfords Warehouse Facility at Sandgate, NSW.

Kind regards

Emily Rowe

Managing Consultant

M +61 434 180 346

erowe@ramboll.com

Ramboll Australia Pty Ltd.

ACN 095 437 442

ABN 49 095 437 442

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Emily Rowe

From: Official Mail <officialmail@ncc.nsw.gov.au>
Sent: Monday, 19 September, 2022 10:55 AM
To: Emily Rowe
Subject: Thank you for your message

You don't often get email from officialmail@ncc.nsw.gov.au. [Learn why this is important](#)

Thank you for taking the time to contact us.

Your correspondence has been received by the City of Newcastle and will be distributed to the appropriate Team/Department.

If required, a response will be provided as soon as possible. If your request is urgent, please call 02 49742000 for 24 hour assistance.