

Our ref: Crawfords Ammonium Nitrate Storage Facility (SSD-5119-PA-6)

Mr Mark Grech
HSSE and Compliance Manager
Crawfords Freightlines Pty Ltd
Old Maitland Road
SANDGATE NSW 2304

18 January 2024

Subject: Approval of the Crawfords Freightlines Sandgate Revised Operational Environmental Management Plan

Dear Mr Grech

I refer to the revised Operational Environmental Management Plan (OEMP) for the Crawfords Ammonium Nitrate Storage Facility submitted to the Planning Secretary for approval via the Major Projects Portal. It is noted the revised OEMP has been submitted in response to the Planning Secretary's Directions dated 15 September 2020, 18 December 2020 and 15 August 2023 and the Department's requests for information (RFI) dated 22 March 2023 and 29 November 2023.

The Department of Planning, Housing and Infrastructure (the Department) has reviewed the revised OEMP in consultation with Safework NSW and concludes the revised OEMP addresses the requirements of the Planning Secretary's Directions, the Department's RFIs and the relevant conditions of the consent (Schedule 3, condition 3 and Schedule 4, condition 2). As such, the following plan is approved:

- 'Operational Environmental Management Plan, Crawfords Freightline Sandgate Site', prepared by Engeny, dated 15 December 2023, Version 6.

The Department will now regulate the storage and management of AN on the site based on the processes and procedures stated in the approved OEMP up to, and including, when the AN storage capacity of the site is at maximum capacity. In accordance with Schedule 4, condition 2, of the development consent, the approved OEMP must be implemented to the satisfaction of the Planning Secretary.

To remove any ambiguity between Schedule 3, condition 3, and the approved OEMP, the Department strongly recommends Crawfords submit a modification to remove the words 'except for a short period of time when the storage is at maximum capacity' from the consent.

Please ensure you make the document publicly available on the project website at the earliest convenience.

The Department requests the OEMP be reviewed on a regular basis to incorporate any recommended measures to improve the environmental performance of the development. At a minimum, this review should be carried out within three months of the approval of any modification of the conditions of the consent (SSD-5119) or the submission of any of the following:

- a Hazard Audit Report under Schedule 3, condition 8
- an Incident Report under Schedule 4, condition 3
- an Independent Audit Report under Schedule 4, condition 5.

For example, further improvements to the effectiveness of the Trigger Action Response Plan could be made by adopting more physical controls and actions, rather than actions that are administrative in nature.

Where further revisions are required to the OEMP, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review, or such other timing as agreed by the Planning Secretary.

Should you have any further enquiries, please contact Sally Munk, Industry Assessments, at the Department on 9274 6431 or via email at sally.munk@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "C. Ritchie".

Chris Ritchie
Director
Industry Assessments

as delegate of the Planning Secretary