

Sally Munk

To: Murphy, Simon
Subject: RE: Stolthaven Mod

From: Murphy, Simon [mailto:Simon.Murphy@aecom.com]
Sent: Friday, 11 September 2015 2:51 PM
To: Sally Munk
Cc: Michael Frost (M.Frost@stolt.com)
Subject: RE: Stolthaven Mod

Hi Sally

Thank you for forwarding the submission from the Correct Planning and Consultation for Mayfield Group. The following table provides responses to the matters raised by their submission:

Comment	Response
CMCFM object to an increase in through put from 1,010ML/yr. to 1,300ML/yr. at SSD664 MOD 1? (MOD 4) the Stolthaven Bulk Fuel Terminal. The community involvement started with the Mayfield Concept Plan (Old BHP site), which Stolthaven sits within. CPCFM have participated in many submissions and consultations with Stolthaven, the Port of Newcastle (PON), NPC former owners of the site and the DoPE. Our concerns have all centred around proper planning and cumulative impacts on the community. DoPE cannot look at this application in isolation of the Mayfield Concept Plan and it's relationship to Stolthaven in planning approvals. We are concerned with Stolthaven business ability; they have put in a number of modifications on their original plans after approval and have breach their licences.	<p>Noted. Stolthaven has sought to consult and update the community regarding their plans for the terminal since the outset.</p> <p>Stolthaven have not undertaken their assessment of potential environmental impacts in isolation of either their existing operations, or the Mayfield Concept Plan. Successive applications have included consideration of previously approved elements of the terminal. To date there have been no other activities or development proceed under the Mayfield Concept Plan and as such, there have been no cumulative impacts identified under the Mayfield Concept Plan.</p> <p>Stolthavens need to submit successive modifications are a reflection of the company's need to respond to market forces rather than an issue with business planning.</p>
They have not always been truthful with community. "300ML, 8th June 2012 – 400ML, 26th July 2013 – 500ML, 10th July 2014 – 1,010ML, 16th April 2015(Attachment D Stage 2 Consultation, at no time in the meeting with CPCFM did Stolthaven talk about increase through put numbers, only construction of 2 tanks)	<p>Stolthaven have continually sought to provide the community with updates regarding their current operations and future plans. Stolthaven holds regular community meetings to keep them informed. The most recent meeting was held on 30 June 2015 at Stolthavens Terminal. Minutes of this meeting are attached. Reference is made to point 5 of the minutes which details Stolthavens advice regarding throughput projections having been informed to the community group.</p>
From Stolthaven on breach of EPL: Calculated emissions as determined by the EPA "TANKS" software modelling, reported values were 475kg of Benzene & VOC 7,774kgs vs. 95kg of Benzene & 1320kg of VOCs. The latter license figures in the EP. (Information only given to community after it was in the media)	<p>Noted. Stolthaven undertook emissions modelling in consultation with the NSW EPA. Detailed of Stolthavens EPL information is made publically available by the EPA.</p>
CPCFM did not put in objections to the stage 2 applications as this trigger the	<p>SSD_6664 was assessed and approved in accordance with the following key components</p>

Comment	Response
<p>long awaited Mayfield condition of consent, which covers the whole of site, MP09_0096.</p> <p>On 16 July 2012, the then Minister for Planning and Infrastructure approved the Concept Plan allowing the coordinated re-development of the site to provide a range of port related uses.</p> <p>The Department recognized that the terminal would need to meet the approved air quality, noise and traffic limits established for the Concept Plan.</p> <ul style="list-style-type: none"> - Assess air quality impacts cumulatively in accordance with Site Air Quality Model and comply with overall site pollutants, performance criteria established for the Concept Plan - Assess noise impacts cumulatively in accordance with a Site Noise Model and comply with amenity noise goals identified in the Concept Plan. - Assess traffic impacts and comply with the total truck movements limits identified in the Concept Pan. <p>SSD_6664 Secretary's Environment Assessment Report April 2015. The proposal by Stolthaven to increase throughput from 500 to 1,010ML/yr. is required to be consistent with the approved envelope of impacts for the Concept Plan. As Stolthaven terminal is currently the only the development within the Concept Plan, it is important to ensure that there is adequate amenity and environmental capacity to allow other future developments to occur and be consistent with this envelope</p>	<p>of the Mayfield Concept Plan:</p> <ul style="list-style-type: none"> - The Mayfield Concept Plan Site Air Quality Model – The Port of Newcastle (PON) has developed an Air Quality Model for the Mayfield Concept Plan Site. SSD_6664 and the proposed modification have been assessed under this model. While the model cumulatively assesses the impacts of successive throughput increases, there have been no other activities on the Mayfield Concept Plan site which generate air quality impacts. - The Mayfield Concept Plan Site Noise Model – PON has developed a Noise Model for the Mayfield Concept Plan Site. SSD_6664 and the proposed modification have been assessed under this model. While the model cumulatively assesses potential noise impacts for activities across the Mayfield Concept Plan site there are currently no other activities on the Mayfield Concept Plan site to be incorporated into this assessment. - The Mayfield Concept Plan (Condition 2.3) lists total truck movements under the Mayfield Concept Plan and includes triggers for infrastructure upgrades when truck movement thresholds are reached. As detailed in the Traffic Impact Assessment (AECOM, 2015) submitted with the modification application the proposed level of truck movements are well within any trigger level identified by the Mayfield Concept Plan Approval. Furthermore traffic modelling indicated that the modification would have a minor impact on the operation of the Ingall St – Industrial Dr Intersection such that it would continue to operate within an acceptable Level of Service. There are no other activities or developments on the Mayfield Concept Plan site which could be incorporated into this assessment.
<p>We have attached the Port of Newcastle's Mayfield Concept Approval Compliance Status.</p> <p>As you can see monitoring is under development in relationship to the stage 2 approval of 1.010 ML /yr. To approve another increase to the throughput before the whole of site monitoring is completed goes against community wishes and the Departments own approvals and recommendations for this site.</p>	<p>Stolthaven in undertaking all monitoring requirements in accordance with its obligations under both its own approval (SSD_6664) and those of the Mayfield Concept Plan approval (MP09_0096). Stolthaven reports it site specific monitoring information to PON as required by its approvals.</p> <p>Currently there are no other operational facilities on the Mayfield Concept Plan site, therefore there is no difference between site based cumulative monitoring that could identify environmental issue. As such an appropriate level of monitoring is being undertaken.</p>
<p>We have attached figures from Air Quality Stage 2 application and modification application for increased throughput, modelling will show at 1,010ML/yr. has a wider spread of VOC's than a 1,300MLyr.</p>	<p>Applications up to and including the application for the 1,010ML was undertaken using information sourced from the National Pollutant Inventory (NPI) which is a Commonwealth Government body. NPI information was used</p>

Comment	Response
We cannot understand why tables and figures with both applications are shown differently. This is also for Noise and Vibration and Traffic Assessments, This makes it difficult for the community to assess the increase application on this modification. Number 4 modification on this project.	<p>as default data in the calculation of emissions from the site. NPI data is typically conservative to account for variabilities across reporting.</p> <p>Subsequent to the application for the 1,010ML, and at the request of the EPA Stolthaven undertook sampling to determine the specific chemical composition of the fuels (diesel) that are stored at the facility as well as sampling of the vapours being emitted from trucks filling at the facility. This data is much more representative of the actual operation of the facility and was used in the Air Quality Impact Assessment for the 1,300ML. The results of this sampling replaced the NPI data in the air quality impact assessment for the 1,300ML.</p> <p>The difference in the results between the Air Quality Impact Assessments for the 1,010ML and 1,300ML indicate that the original site assessment were very conservative meaning a high level of scrutiny and resulting management measures have been applied to the terminal.</p>

Feel free to contact me should you wish to discuss.

Kind Regards

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