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16 June 2016

Ms Pamela Morales  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Dear Pamela

**RE: RESPONSE TO EPA COMMENTS ON RESPONSE TO SUBMISSIONS REPORT, PORT KEMBLA BULK LIQUIDS TERMINAL MAJOR PROJECT DEVELOPMENT APPLICATION (SSD 15\_7264)**

Thank you for your providing the comments and request for further information in the letter dated 11th May 2016 from the Environmental Protection Authority (EPA) on the Environmental Impact Statement (EIS) and subsequent Response to Submissions Report (RTS) for the proposed Bulk Liquids Terminal at Port Kembla (SSD 15\_7264).

TQ Holdings Australia Ltd (TQ) with the assistance of Cardno (NSW/ACT) Pty Ltd (Cardno) and Pacific Environment Limited has undertaken a review of additional comments provided by the EPA. Please see our response below covering the relevant matters addressed in both Attachment A and Attachment B of the letter from the EPA.

The comments and further clarifications on matters include:

- Air Quality
- Noise
- Water Quality
- Traffic and Transport
- Contaminated Land Management

## **Air Quality**

TQ with the assistance of Cardno and Pacific Environment Limited has reviewed the recommendations in Attachment A of the EPA letter and Air Conditions in Attachment B of the EPA letter. TQ are also pleased to note that all previous concerns raised have been satisfactorily addressed in the RTS.

As noted and acknowledged in the EPA letter TQ is committed to the preparation of a Construction Environmental Management Plan (CEMP). This plan will document the appropriate mitigation measures to prevent or minimise the emission of dust from the premises during construction and will outline requirements to monitor performance and ongoing effectiveness of management measures. TQ understands the importance of this as there are a range of sensitive receivers in the vicinity of the project that include car importers and residential areas.



The EPA requested in Attachment B of their letter that TQ adopt a Leak Detection and Repair (LDAR) program. TQ notes that the proposed formal LDAR program, US EPA Method 21 – determination of volatile organic compound leaks (40 CFR Part 60 Appendix A, Method 21) is not applicable to bulk gasoline terminals, as stated in Appendix B of the “Leak Detection and Repair – A Best Practices Guide” as published by the US EPA.

To meet the intent of the LDAR program for a bulk liquids terminal, TQ proposes to detect leaks through routine inspections including:

1. Frequent (every 4 hours) visual inspection of the shorelines during unloading of vessels
2. Daily visual inspections of product piping, pumps and valves using a formal checklist and site audit

TQ proposes to keep records of the visual inspections and any items requiring maintenance shall be reported. TQ propose to provide an annual report including:

1. The list of components included in the inspection regime
2. The frequency of inspection for each item in the inspection regime
3. The type of components and the scale of the leaks for any equipment where leaks are found
4. Rechecking of equipment after repairs have been undertaken
5. Repair responses and response times
6. An assessment of the reason components could not be repaired within the timeframes specified
7. Any recommendations to improve the inspection regime

Also TQ supports the limit of 10 mg/L of volatile organic vapours identified in the “Air Concentration Limits for Point 1” which will be from the Vapour Recovery Unit (VRU).

TQ acknowledges that a Human Health Risk Assessment (HHRA) was prepared to accompany the EIS and this assessment has interdependency with information assessed in the Air Quality Assessment (AQA). DPE has been provided with the latest version of the HHRA, which has been reviewed against additional information provided and assessed in the additional AQA details provided with the RTS. TQ has also provided additional correspondence to DPE from Environmental Risk Sciences Pty Ltd (dated 9 May 2016) to address comments from NSW Health from their reviews of the EIS and RTS.

## Noise and Vibration

### EPA Comment #1:

The EPA recommends that the noise conditions in Attachment B to this letter be secured as conditions of approval if the project is approved. In developing these conditions the EPA has taken into account information provided in the EIS and Submissions Report. These requirements address the issues raised in EPA response dated 8 February 2016 and inconsistent references to sensitive receivers in the Noise Impact Assessment (NIA).

The EPA requested clarification of source sound power levels and source heights used to model the project. The Response to Submissions stated that direct measurement of individual sources would be difficult and "a misleading representation of appropriate noise limits for the site." An alternate approach was also not provided as requested in the EPA response.

The EPA recommends that approval conditions be secured that require the development and implementation of a procedure to verify compliance with the attached noise limits and EIS predictions. This should include confirming, by measurement, the source heights and sound power levels used in the model.

As indicated in the EPA response dated 8 February 2016, past piling activities at Port Kembla have been a source of community complaint. The EPA supports the proponent's commitment in the Submissions Report to undertake vibration trials during the initial piling works to validate predictions in the NIA. The EPA recommends that this should include both vibration and noise.

The CEMP should include the following matters:

- > Noise and Vibration Management Plan prepared in accordance with Interim Construction Noise Guideline (DECC 2009) available at:  
<http://www.epa.nsw.gov.au/noise/constructnoise.htm> and
- 1. Assessing Vibration: A Technical Guideline (DEC 2006) available at:  
<http://www.epa.nsw.gov.au/noise/vibrationguide.htm>.
- > The following matters should also be considered:
  - Selection of the piling method
  - Sufficient justification for the piling method selected taking into account outcomes of the trial
  - Assess the feasibility of alternative quieter methods or equipment
  - If any high noise activities are to be undertaken such as piling noise, they should be factored into the quantitative assessment by adding 5 dB to the predicted levels assessment
  - A description of all feasible and reasonable measures to minimise noise and vibration impacts
  - Identification of all potentially affected sensitive receivers.

### TQ Response #1:

TQ with the assistance of Pacific Environment Limited have reviewed the recommendations in Attachment A and Attachment B of the EPA letter.

Pacific Environment Limited suggest the initial comments in Attachment A include a recommendation for sound power level testing as part of the facility commissioning to confirm the site noise emissions are as modelled in the EIS to be included in the planning approval conditions.



Pacific Environment Limited suggest post commissioning noise testing should compare the sound power levels and source heights presented in the EIS as opposed to the sound pressure levels measured at 1 metre suggested in the EPA comments as they are not comparable.

Given the industrial environment with unpredictable noise sources surrounding the proposed project site, it is not possible to determine the noise impact of the project on the sensitive receivers. TQ propose to:

1. Conduct simultaneous noise monitoring at the project noise generating equipment and at the nearest sensitive receivers as noted by the EPA. This monitoring will be done during commissioning or the early stages of operations when it is possible to simulate conditions used in the model. The purposes of this monitoring is to:
  - a. Verify the noise impact assessment modelling
  - b. Provide a baseline of noise level generated from the noise generating equipment onsite
  - c. Establish noise limits for future noise monitoring of equipment within the project site.
2. Provide annual monitoring of the noise generating equipment to confirm each specific item of noise generating equipment is within the baseline noise.

TQ propose that if no exceedance of the criteria occurs for 3 years and the EPA is satisfied with the review, noise monitoring will not be required to continue.

TQ will consider and include the matters relating to noise and vibration management in the CEMP as noted by the EPA.

## Water Quality

### Water Management

#### EPA Comment #1:

As indicated in the EPA's Secretary Environmental Assessment Requirements dated 30 September 2015, the environmental outcome of the project should be to ensure there is no pollution of waters including surface and groundwater. In general except as may be expressed in an EPL the proponent must comply with Section 120 of the Protection of the Environment Operations Act 1997 (POEO Act) and must not pollute waters. To support this legislative requirement, the EPA recommends that the water condition in **Attachment B** to this letter be secured as a condition of approval if the project is approved.

The EPA previously advised that if a discharge is unavoidable, the proponent should undertake a wastewater characterisation to identify pollutants likely to be present in the water discharge at levels that are not trivial. Trivial relates to both the concentration of the pollutant as well as its risk to the environment.

The EPA also required an assessment of the likely impacts of discharges on the waters and the proposed mitigation, monitoring and management measures that will be installed, operated and maintained, should also be provided.

The proponent advised that discharge limits would be developed through a future environmental protection licence process for the project.

Further information should be sought from the proponent on water management to inform both DPE's and EPA's assessment of the project. This information should include, but not limited to:

1. Opportunities to prevent discharge of pollutants to waters. This includes reuse of waters where it is safe and practical to do so or discharge to sewer.
2. Characterisation of any proposed discharges to waters.
3. Assessment of the likely impacts of discharges on the waters and how these will be mitigated, particularly in regard to the uses and values of the waterway.
4. An indication of whether any of the proposed discharges should be regulated by the licence and, if so, which pollutants.
5. Proposed discharge limits, monitoring and reporting requirements.

In exercising its licensing functions the EPA takes into consideration the factors listed in Section 45 of the POEO Act. Further information on EPA's approach to water licensing is detailed in "Using environment protection licensing to control water pollution" available at:

<http://www.epa.nsw.gov.au/resources/epa/130119eplswater.pdf>

#### **TQ Response #1:**

TQ notes EPA's request for further information relating to water management measures to be implemented at PK BLT. Please see the response to the above requests provided below.

TQ acknowledges EPA's Secretary Environmental Assessment Requirements dated 30 September 2015, the environmental outcome of the project should ensure there is no pollution of waters including surface and groundwater.

TQ understands that it is an offence under section 120 of the POEO Act to pollute waters. However, sections 121 and 122 of the Act provide a defence against a prosecution under section 120 where the pollution was regulated by a licence or regulation which was complied with fully.

The EPA has requested further information on water management to inform both DPE's and EPA's assessment of the project. This information requested has considered:

#### **1. Opportunities to prevent discharge of pollutants to waters. This includes reuse of waters where it is safe and practical to do so or discharge to sewer.**

TQ are proposing to only capture, manage, treat and discharge stormwater which is captured on site by surface drainage infrastructure. This includes stormwater collected in areas of roadways, building roofs and bunds around fuel storage and transfer equipment (i.e. tanks, pipework and bowsers). The site will be comprised of mainly impervious surfaces.

The EIS and RTS reports have shown that TQ has explored and considered a range of opportunities to prevent uncontrolled discharges and to prevent pollution of waters through engineered design features that include but are not limited to:

- Treatment of stormwater runoff via an Oil Water Separator (OWS) combined with a multi-staged containment unit incorporating bunds, sumps, storage gravity settling pits and slops tanks.
- Separation of fuel storage and transfer equipment water management areas using appropriately designed bund walls.
- Use sediment barriers and sediment fences.

- Recovery or transfer of hydrocarbons via waste collection vehicle for disposal.
- Appropriately designed stormwater infrastructure that is hydrocarbon compatible.
- Underground Gross Pollutant Trap (GPT) for the treatment of existing stormwater flows from the Tom Thumb Road drainage network.
- Appropriate staging design.

The reuse opportunities for captured and/or treated stormwater water runoff have been considered to be limited as has been noted in Section 7.7 and Appendix J (Surface Water Assessment) of the EIS and Section 3.2.6.3 of the RTS report. This is mainly because the ongoing operations are not expected to require intensive water demands that could reuse recycled or treated water.

Liquid waste streams, including waste slops that will be isolated from any water discharges to prevent discharge of pollutants, have been considered in Section 7.10.4 of the EIS. Industrial liquid wastes will be separated and stored for removal by truck from the site for offsite processing. The management measures proposed for ablutions include pumping domestic wastewater and sewerage from hygiene amenities to sewer.

## 2. Characterisation of any proposed discharges to waters.

The EIS and RTS reports have provided details and assessment of the likely pollution sources to discharges that could occur from the PKBLT Project, during both construction and operational phases. The summary provided in Table 1 below provides a detailed summary of potential pollutant sources so that discharges can be characterised.

**Table 1 - Summary of Potential Water Pollution Sources**

| Potential Pollutant Sources                                                      | Potential Pollutant                                             |
|----------------------------------------------------------------------------------|-----------------------------------------------------------------|
| Potential leaks from onsite sewage holding and management system                 | BOD                                                             |
| Hydrocarbon storage and transfer equipment as well as vehicles operating on site | Oil and Grease, and Hydrocarbons                                |
| Stormwater runoff from roads and hardstand areas outside of bunded areas         | Gross Pollutants, Oil and Grease                                |
| Dust and particulate matter from construction activities and transport roadways  | Total Suspended solids (TSS)                                    |
| Potential leak from bunds during a rain event or a spill into the bund sump.     | Hydrocarbons, pH and BOD (from Ethanol storage), Oil and Grease |

## 3. Assessment of the likely impacts of discharges on the waters and how these will be mitigated, particularly in regard to the uses and values of the waterway.

The EIS and RTS reports have provided details and assessment of the likely impacts on the receiving waters of discharges arising from the PKBLT Project, both during construction and operational phases.

A summary of the water quality impacts of discharge waters are provided below:

- Increased peak flow rates and runoff volumes discharging from sites due to an increase in impervious surface areas within the project area.
- Generation and mobilisation of fine particles, gross pollutants, hydrocarbons and associated heavy metal and organic contaminants.
- Increased sediment loads and sedimentation of waterways.

- Hydrocarbon spills, slops or contaminated stormwater into adjoining water bodies.
- Wastewater from cleaning construction equipment and plant could enter the waterway and decrease water quality

These impacts were considered with particular reference to their impact upon the Green and Golden Bell Frog (*Litoria aurea*) and Grey Mangrove (*Avicennia marina*). The marine and terrestrial as well as water quality impacts have been assessed and the associated risk mitigation measures have been clearly defined for consideration in the detailed design and subsequent site environmental management plans (Refer to Section 7 and Table 11-1 of the EIS).

As discussed in Section 3.2.6.2 of the RST, the relevant Water Quality objectives for Port Kembla would be upheld by the project through effective stormwater management design and operational measures to ensure the protection of neighbouring waterbodies.

**4. An indication of whether any of the proposed discharges should be regulated by the licence and, if so, which pollutants.**

TQ acknowledges the need to have their defined discharge locations regulated by an EPL. The locations of discharges required that will need to be licenced are outlined below in Table 2.

**Table 2 - Licenced Discharge Locations Proposed**

| Discharge ID | Location                                 | Potential Pollutant          |
|--------------|------------------------------------------|------------------------------|
| Point 1      | Site 2 - Stormwater Discharge            | Oil and Grease               |
| Point 2      | Site 3 – Discharge in Gurungaty Waterway | BOD, Oil and Grease, pH, TSS |

**5. Proposed discharge limits, monitoring and reporting requirements.**

An assessment of proposed discharge limits and associated monitoring and reporting regimes are outlined below for each proposed discharge point. These proposed limits have been derived from acceptable limits from EPL conditions from other similar fuel terminals and facilities that operate in NSW and the immediate surrounds.

A summary of proposed discharge limits and monitoring requirements for Discharge Point #1 is provided in Table 3 and Discharge Point #2 in Table 4.

**Table 3 - Proposed Point 1 Discharge Limits and Monitoring Frequency (Site 2 Stormwater Discharge)**

| Pollutant      | Unit of Measure             | Concentration Limit (100 percentile) | Monitoring Frequency                    |
|----------------|-----------------------------|--------------------------------------|-----------------------------------------|
| Oil and Grease | milligrams per litre (mg/L) | 10                                   | Grab sample weekly during any discharge |

**Table 4 - Proposed Point 2 Discharge Limits and Monitoring Frequency (Site 3 Discharge from Oily Water Separator System)**

| Pollutant              | Unit of Measure             | Concentration Limit (100 percentile) | Monitoring Frequency                    |
|------------------------|-----------------------------|--------------------------------------|-----------------------------------------|
| BOD                    | milligrams per litre (mg/L) | 20                                   | Grab sample weekly during any discharge |
| Oil and Grease         | milligrams per litre (mg/L) | 10                                   | Grab sample weekly during any discharge |
| pH                     | pH                          | 6.5 – 8.5                            | Grab sample weekly during any discharge |
| Total Suspended solids | milligrams per litre (mg/L) | 50                                   | Grab sample weekly during any discharge |

**Note:** A licence condition with a 100 Percentile Limit means that 100% of samples (or all samples) taken must not exceed the limit for that pollutant. This can be extrapolated for other percentiles, for example an 80 Percentile Limit means that 80% of samples taken must not exceed the limit for that pollutant within the annual licence period.

### Reporting Requirements

Pollution monitoring data that is required to be collected by a licence condition must be published by the licensee in accordance with section 66(6) of the POEO Act and with the written requirements outlined in the agreed EPL.

Relevant agencies (including the EPA) shall be notified of incidents within 24 hours of detecting an exceedance of the limits/performance criteria in the EPL or where the occurrence of an incident causes (or may cause) harm to the environment. A written report shall be provided to relevant agencies (including the EPA) that describes the date, time and nature of the exceedance/incident and that will identify the cause, actions undertaken to date and proposed measures to address the exceedance/incident.

Annual reporting for the project will be carried out in accordance with the requirements outlined in the EPL.

In addition to the above, TQ is required to provide an Environmental Condition Report to NSW Ports every 5 years, which consists of a Phase 1 Environmental Assessment in accordance with the 'Guidelines for Consultants Reporting on Contaminated Sites' (prepared by the NSW EPA, first published in 1997 and reprinted in August 2011) with additional assessment required if the Phase 1 environmental assessment identifies any known or suspected contaminants. TQ is willing to share this Environmental Condition Report with the EPA.



**EPA Comment #2:**  
**Fire Water Management**

The EIS states that a detailed Fire Safety Study and fire system design will be undertaken to determine optimal type and methods for collection and dewatering of foams within bunded areas. A condition of approval should be secured that requires the preparation of Fire Safety Study developed in accordance with DPE's *Hazardous Industry Planning Advisory Paper No 2*.

The study should include information on fire water retention developed and implemented in accordance with the New South Wales Government's *Best Practice Guidelines for Contaminated Water Retention and Treatment Systems July 1994*.

The proponent states that due to the presence of ethanol onsite, alcohol resistant foam will need to be used. The proponent has indicated that they will ensure that the firefighting foam selected will not contain components that may lead to long-term toxic impacts in the environment such as perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA). Upon selection of the foam type, an assessment of the potential impact of contaminated water into the surface or groundwaters will be undertaken and measures considered to minimise discharge of contaminated firewater.

The proposed firefighting foam should not contain PFOS and PFOA. The Submissions Report states that at the current stage of the project, the type of firefighting foam that will be used onsite has not been selected for the facility. The selection of the firefighting foam will be considered in consultation with foam suppliers taking into account environmental considerations.

The proposed Fire Safety Study should include the following information:

- > Selection of the firefighting foams to be handled, stored or used
- > Justification for the foams selected
- > Characterisation of any potential discharges to surface or groundwater waters and how these will be mitigated
- > Measures to contain any contaminated fire water.

**TQ Response #2:**

TQ acknowledges the Fire Safety Study will be prepared in accordance with the DPE's Hazardous Industry Planning Advisory Paper No 2 and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems July 1994.

As specified in Table 6-1 of the RTS Report, a detailed Fire Safety Study and fire system design will be undertaken to determine optimal type and methods for collection and dewatering of foams within bunded areas. The study will include and detailed design will consider:

- Selection of the firefighting foams to be handled, stored or used (not containing perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA));
- Justification for the foams selected;
- Characterisation of any potential discharges to surface or groundwater waters;
- An assessment of the likely impacts in the event of any discharge of contaminated fire water; and
- A description of all feasible and reasonable measures to minimise any discharge of contaminated fire water

## Traffic and Transport

### Best Management Practice for Diesel Vehicles

In its response on the EIS, the EPA recommended the proponent should include the development and implementation of a Truck Noise Auditing Program to confirm trucks achieve noise standards for engine brake noise.

The EPA also recommended air emission and noise issues on all on-road diesel trucks associated with the project should:

- > Conform with relevant and current emission standards as prescribed in Australian Design Rules for heavy-duty engines and vehicles (EURO IV); or
- > Where the vehicle is older than the 2006 model year (that is, EURO I, EURO II or EURO III standards), the vehicle should be fitted with a diesel exhaust treatment device
- > Consider emission reduction options in the diesel NEPM.

The proponent states in the Submissions Report that they have limitations in the level of control of heavy vehicle standards for transport operators likely to utilise their site. However, they will endeavour to seek to manage engine braking noise issues through the communication of transport fleet and driver behavioural expectations. The following additional commitments were proposed:

- > They will utilise freight companies that commit to sourcing vehicles with Compliance Plate Approval.
- > This ensures trucks meet the national standards covering safety and emission requirements known as the Australian Design Rules (ADR) and seek to utilise companies that have a commitment to operational and environmental improvements
- > Develop and implement a noise monitoring and/or auditing program within the Traffic Management Plan to confirm trucks achieve noise standards during the construction and operational phases.

The EIS states that the proposal by Stage 3 would generate up to 206 heavy vehicle movements per day. This would represent approximately 1442 heavy vehicle movements per week. This represents a significant number of additional heavy vehicles using the Port and region's roads. In response to a similar major heavy vehicle generating development at the Port, conditions were included in the Cement Australia Project (Application Number: 10\_0102) at Port Kembla to address the above issues.

The EPA requests further discussions with DPE and the proponent with the aim of developing feasible and reasonable management strategies to achieve the highest noise and emissions standards for facility vehicle movements. This may include similar requirements to the above. Cement Australia Project.

**TQ Response #1:**

*The proponent should include the development and implementation of a Truck Noise Auditing Program to confirm trucks achieve noise standards for engine brake noise.*

TQ acknowledges the EPA's recommendation to include the development and implementation of a Truck Noise Auditing Program to confirm trucks achieve noise standards for engine brake noise.

As discussed in the RTS Section 3.2.7.3, TQ does not have authority to enforce legislated standards on third party trucks. TQ further notes that engine brake noise or compression brake noise is difficult to audit as there are no clear measurement methods or noise limits for such noise. Truck exhaust systems can be a source of noise, but this can be monitored and limits are defined for truck operators to adhere to.

The National Heavy Vehicle Accreditation Scheme (NHVAS) is a voluntary accreditation scheme that aims to reduce the social, environmental and economic impacts of heavy vehicles by focusing on proactive maintenance and operations. The NHVAS requires the stationary noise level of a heavy vehicle to be measured in accordance with the 'National Stationary Exhaust Noise Test Procedures for In-Service Motor Vehicles'.

TQ will be implementing a truck site access accreditation system and a vehicle booking system which will give us visibility on all truck movements in and out of the terminal. Site access protocols will include preferred trucking routes and awareness of the NHVAS accreditation scheme. TQ will also commit to only permitting trucks that are accredited through the Safe Load Program (SLP) entering the Port Kembla terminal. Among the auditing of many safety related functions, the SLP requires truck operators to present roadworthy vehicles for inspection every 6 months.

**Air Quality**

The Proponent shall ensure that all plant and equipment must be designed and installed to meet Group 6 limits under the Protection of the Environment Operations Clean Air Regulation. As discussed in the Section 5.2 of the Best Practice Management Review for Diesel Vehicles provided with the RTS, TQ shall commit to the following initiatives:

- Transport companies shall have vehicles demonstrating they have 'Compliance Plate Approval' to ensure trucks meet the national standards covering safety and emission requirements known as the Australian Design Rules (ADRs).
- Procurement policies should consider companies which have a commitment to operational and environmental improvements.
- TQ is encouraged to review the existing Drivers Policy (as outlined in Section 4.2) to provide a set of guiding principles for transport operators using the PK BLT and to ensure emission impacts arising from heavy vehicle use are minimised.

**Off Road Equipment**

TQ does not propose to have any off road equipment, with the exception during construction, in which period, the contractor will supply the construction equipment. TQ will conduct site inspections of the construction equipment and will direct the contractor to conduct maintenance on any equipment that is found to be non-compliant.

**Best Management Practices for Ships**

TQ notes that the EPA's desire is to include the berthing box of the vessel as part of the TQ premises for the purposes of noise regulation.

TQ advises that vessels used to deliver product to Port Kembla will not be selected by TQ. TQ does not have authority to enforce local legislated standards on third party vessels. TQ notes



that the specific inclusion of the berthing box in the site boundaries for the noise monitoring purposes does not appear to be an EPL requirement for other bulk liquids operators in Port Kembla, Port Botany or Newcastle, nor is it an EPL requirement for the recently built Cement Australia Plant in Port Kembla.

TQ will work with the Port Kembla Port Authority to ensure the vessels comply with all international shipping standards while at berth in Port Kembla but do not believe the berthing box should be included in the EPL for noise monitoring purposes.

## **Contaminated Land Management**

TQ have conducted detailed soil contamination, geotechnical and groundwater testing on the project site. The results of the investigation revealed there is no gross contamination of the site, and the only ongoing monitoring recommended is groundwater monitoring. The Geotechnical Report and the Soil and Groundwater Contamination Report are both being reviewed internally. Once the information has been distributed internally, the results of the reports will be made available to the EPA for their reference.

It is noted that Potential Acid Sulphate Soils (PASS) may be encountered generally during excavation works between 8-12m below ground level. Our proposed construction methodology will be such that the exposure of PASS will be minimised. The management of PASS will be outlined in the CEMP.

Therefore, TQ propose that there is no requirement for an EPA Accredited Site Auditor in addition to the construction contractor and TQ staff that will already be monitoring and auditing the implementation of the CEMP during the course of construction.

We trust that the additional information provided herein will provide the EPA with adequate responses to the comments provided. TQ would be pleased to discuss any aspects further with both the Department as well as the EPA as required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Pincott'.

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For and on behalf of TQ Holdings Australia Pty Limited and their related entities from time to time.