

Stolthaven Australia Pty Ltd



A subsidiary of
Stolt-Nielsen Limited

Level 14, 60 Albert Rd.
SOUTH MELBOURNE, Vic 3205
Australia

Tel: +61 3 9931 1880
Fax: +61 3 9931 1099
www.stolt-nielsen.com

8 July, 2019

Department of Planning & Environment
Suite 14, Level 1, 1 Civic Ave.
SINGLETON, NSW. 2330

Att: Heidi Watters

RE: Stolthaven Response to Independent Environmental Audit

Dear Leah,

This letter is provided in response to the recommendations noted at Section 6 of the Independent Environmental Audit (**Audit**) of the Stolthaven Fuel Storage Facility (**the Facility**) at Steelworks Rd. Mayfield, New South Wales.

The Audit is required under the Conditions of Project Approval for SSD 6664, Schedule 4, Condition 8 and this letter, outlining Stolthavens response to the recommendation contained within the Audit, is required under Schedule 4, Condition 9 of the same approval.

Stolthaven Responses to Recommendations of the Audit re 'Non-Compliances' as follows:-

Condition	Recommendation	Response
SSD 6664 2-2c, SSD 6664 2-2e, SSD 7065 B2a	It is recommended all actions arising from this IEA are completed to avoid future non-compliances with the development consents and commitments.	<i>Stolthaven accept this recommendation</i>
SSD 6664 4-2a, SSD 7065 D7a	Update management plans to include detailed baseline data at the next review.	<i>Now the site has 5 years of operational data, the Management plans can be updated with baseline data, where applicable, upon the next review.</i> <i>Action added to site's action register.</i>
SSD 6664 4-2g, SSD 7065 D7g	Include a section in the TMP, USMP and LMP with protocols to receive, handle and respond to complaints in each management plan at next update or reference to the procedure in the OEMP.	<i>Plans to be updated at next review.</i> <i>Action added to the site's action register.</i>
SSD 6664 4-2g, SSD 7065 D7g	Although not required under SSD 7065, it is recommended that the TMP for SSD 7065 is updated to include expected traffic numbers as a result of the Project to inform any management and mitigation measures that may be required.	<i>Plan to be updated at next review.</i> <i>Action added to the site's action register.</i>
SSD 6664 AMMM 26	Monthly testing of the fire pumps is undertaken and weekly testing is required in this condition, and therefore this is a non-compliance. It should be noted, however, that the Hazard Audit assessment states "Testing of the fire system is done monthly by an accredited 3rd party provider... This was found to be in order"; and it is not a requirement under SSD 7065.	<i>Fire pump testing is managed monthly. Applicants Management & Mitigation Measures should be amended to correct this however Stolthaven intent is to surrender SSD 6664.</i>



Stolthaven Responses to Recommendations of the Audit re 'Continual Improvement' as follows:-

Condition	Recommendation	Stolthaven Response
SSD 6664 3-10b, SSD 6664 3-10c, SSD 7065 C44a	Undertake a review of the SWMP prior to commencement of works under SSD 7065 to ensure it is consistent with the <i>Managing Urban Stormwater</i> Guidelines, and include figures where relevant.	<i>Noted, plan to be reviewed prior to commencement of further works under SSD 7065.</i> <i>Action added to the site's action register.</i>
SSD 6664 3-18d	Include copies of all approvals from utilities and services providers as an appendix to the USMP at the next update.	<i>Plan to be updated at next review.</i> <i>Action added to the site's action register.</i>
SSD 6664 3-40	It is recommended the Waste Register is updated to record quantities for other waste streams identified in SSD 7065 EIS such as general waste, recyclables, sludge, ablutions waste and vegetation/landscaping waste.	<i>The site has modified the Waste register to include all waste streams. Detailed recording to start from Jan 1st 2019.</i>
SSD 6664 3-40	It is recommended specific recycling targets are developed for the Project to help identify any areas of improvement.	<i>To be added into the site's EIS upon next review.</i> <i>Action added to the site's action register.</i>
SSD 6664 4-5c	It is recommended further comparisons to predictions in the EIS are included in future annual reviews such as waste quantities produced.	<i>As above.</i>
SSD 7065 D15a	The Stolthaven website contains a link to DPE's major project website. It is recommended the EIS documents are uploaded directly to Stolthaven's website.	<i>Stolthaven to action once the surrender of SDD 6664 is complete, to prevent confusion with previous stages.</i>
EPL 20193 L2.1	It is recommended Stolthaven undertake the revised pollutant load assessments required in consultation with the EPA to finalise the Benzene assessable load limits and update the EPL accordingly.	<i>Stolthaven detail the method in which the load limits are assessed during the EPL annual return. No concerns have been presented by the EPA to date.</i>
EPL 20193 L5.7a	It is recommended photos and/or detailed notes are taken from the monitoring locations during the annual noise compliance assessments undertaken by AECOM, describing the distance and direction from dwellings.	<i>Noted. This will be considered, however it should be understood that due to the nature of the site and surrounding context, established noise levels and associated mitigation and management is based on theoretical models.</i>

If you require any additional information or clarification in relation to the above, please contact the under-signed by email on g.amodeo@stolt.com.

Yours Sincerely

GAETAN AMODEO
Compliance & Risk Manager
Stolthaven Australasia Pty Ltd