NSWPorts

Operational Environmental Management Plan

Bulk Liquids Berths (BLB1 & BLB2) – Port Botany

NSW Ports | April 2025 | Version: final v4.2

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Document Control

REV #	DATE	UPDATES	PREPARED BY	APPROVED
V1	Sept 2013	First draft document	A. Wedgwood	Submitted to DPIE
V2	Oct 2015	Document revised with DPIE comments	A. Wedgwood	DPIE
V2.1	Feb 2018	Internal review – contact details and roles	A. Wedgwood	A. Wedgwood
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V4.2	Apr 2025	- Changes to Roles & Responsibilities (s1.7 & s2 tables) - Updated HSE (Jan 2025) Policy in Appendix B - References to Qenos and Origin removed	B.Beudeker	B.Beudeker

Note: Hard copies of the OEMP are Uncontrolled Documents and may not be the latest version. For the latest version scroll down and click on Environmental Management at:
https://www.nswports.com.au/port-botany#project-compliance

Glossary of Terms and Acronyms

TERM	DEFINITIONS
BIRP	The BLB Biosecurity Incident Response Procedure
BLB1	Bulk Liquids Berth 1 – includes the wharf and the land between the seawall and the entrance gateway at the Office Building
BLB2	Bulk Liquids Berth 2 – includes the wharf and the land between the seawall and the entrance gateway at the Office Building
DAFF	Department of Agriculture, Fisheries and Forestry (Federal government)
DPE	Department of Planning and Environment. (NSW State Government)
DPE Secretary	Secretary of DPE (former Director-General of DPE)
EA	The Environmental Assessment (Bulk Liquids Berth No. 2 – Port Botany) dated November 2007 and prepared by Sinclair Knight Merz
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence issued by the EPA
HSE Policy	NSW Ports Health, Safety and Environment Policy
MLA	Marine Loading Arm
OEMP	BLB Operational Environmental Management Plan
Operating Company	Each company whose personnel are, will be, or have been utilising the berths for a particular vessel.
PB EMP	Port Botany Overarching Environmental Management Plan
PANSW	Port Authority of NSW (formerly Sydney Ports Corporation)
POEO Act	NSW Protection of the Environment Operations Act 1997
Port Botany Operations Pty Ltd	Operating company for the BLBs, operating under the company name NSW Ports.
ShIPS	Sydney's Integrated Port System – the vessel booking and Dangerous Goods Management System (Note: PANSW to replace SHiPs with One Port in Q1 2024)
TfNSW	Transport for NSW
VTS	PANSW Vessel Traffic Services
Wharf	All the areas seaward of the security fence adjacent to the seawall at BLB 1 & 2.

1. Introduction

1.1. Background

NSW Ports operates two Bulk Liquid Berths (BLBs) at Port Botany – BLB1 and BLB2.

The Bulk Liquids Berth 2 (BLB2) is the second purpose-built bulk liquids facility located at Port Botany, adjacent to the BLB1. It is a common user facility controlled by the Port Botany Operations Pty Limited (operating as NSW Ports).

Vopak Terminals Pty Ltd submitted a Major Project Application (07_0061) under Part 3A of the Environmental Planning and Assessment Act 1979 (now repealed) in 2007 for the construction and operation of the BLB2 facility at Port Botany, on behalf of Sydney Ports Corporation (SPC). On 20 March 2008 planning approval was granted for the Project. NSW Ports assumed control of the facility from SPC on 1 June 2013 under the 99-year lease of Port Botany, and is responsible for overall compliance with the Project Approval conditions.

The conditions of Project Approval (**Appendix A**) require an Operational Environmental Management Plan (OEMP) to be completed for the BLB2. This OEMP relates to operations at BLB2, as well as BLB1, as bulk liquids transfer facilities.

The aim of this OEMP is to provide detailed frameworks, policies, performance criteria and procedures to minimise the physical, social and environmental impact of activities during operations at the BLBs. In particular, the OEMP includes monitoring and reporting mechanisms whereby the performance of the system can be measured and agreed corrective actions implemented in a timely manner in the event of an incident.

The OEMP has been prepared in accordance with the *Guideline for the Preparation of Environmental Management Plan* (DIPNR, 2004), and sound engineering and environmental practice.

The OEMP is designed to be read in conjunction with the NSW Ports BLB Operations Manual and procedures, which also includes operational environmental management procedures, as well as the Port Botany Overarching EMP (available to all BLB operators tenant through the NSW Ports website tenant portal).

1.2. Facility Description

1.1.1. Location

The BLBs are located on the west side of privately owned Fishburn Road, adjacent to the boundary of Vopak Site B and the Elgas Caverns, in the suburb of Port Botany (refer **Figure 1**). BLB2 is located adjacent to the existing Bulk Liquids Berth (BLB1) at the south-western end of Brotherson Dock approximately 11 km south of the Sydney CBD. Port Botany has been substantially developed for industrial purposes relating to shipping and port activities. The resulting built form of the suburb has resulted in complex infrastructure and services reliant on and providing niche services to the larger economic activities associated with the Port.

1.1.2. Operational Activities

The main products handled at the BLBs are refined fuels, gases and chemicals. The BLB2 comprises a concrete deck on a steel piled pier berth adjacent to the existing BLB1; associated infrastructure such as marine loading arms, fire-fighting equipment, onshore support facilities and pipelines from existing user sites to the new berth. The open access, multi-user berth operates on a 24 hour/ 7 day per week basis. BLB2 has been designed to accommodate 120,000 dead weight tonne vessels to a maximum of 270m length overall. BLB2 will also allow for the servicing of ships at the berth.

Environment Protection Licenses (EPLs) are issued by the NSW Environment Protection Authority (EPA) to the terminal operators using the BLBs. It will be the responsibility of those users to ensure that they meet the conditions of those licenses. The companies that have established bulk liquids/gas storage terminals at Port Botany, and the EPL number for each company (tenant), is listed below with a link to the EPA licence register:

- Quantem EPL No.1048
- Elgas EPL No.10698
- Vopak Terminals Australia EPL No. 6007

NSW Ports will not place conditions on BLB users that contradict the requirements of their respective EPLs. Each BLB user is also required to develop, implement and maintain their own OEMP, a copy of which is provided to NSW Ports.

The BLB users are also required to provide an Annual Compliance Report confirming compliance with the OEMP.

Beneficiaries of BLB1 and BLB2 include the chemical manufacturing industry, LPG users, oil majors and fuel supply to Sydney Airport.

Figure 1: Location of Port Botany BLBs

1.1.3. Dangerous Goods

The flammable liquids, liquefied flammable gases, combustible liquids and chemicals for transfer at the BLBs are listed in **Table 1**. A full list of all the products handled at the BLBs, their HazChem codes, and fire-fighting requirements are provided in the Ports Operation Manual (Chapter 13). The Table also provides an assessment of their potential impacts on the environment.

Table 1: Proposed Dangerous Goods for the Transfer and Handling at BLB1 and BLB2

MATERIAL NAME	CLASS	POTENTIAL ENVIRONMENTAL IMPACTS
Liquefied Petroleum Gas – LPG ***(BLB1 only)***	2.1. Flammable Gas	- Minimal environmental damage as gas evaporates rapidly with little or no impact to surroundings. [Note: LPG not currently imported or exported through BLB2 but could be developed in the future]
Refined Petroleum and Chemicals, diesel, biodiesel, ethanol, hexene, bitumen, jet fuel	3. Flammable & Combustible Liquid	- Potential impact to the bio-physical environment depending on spill quantity and containment.
Toxic Substances	6. Toxic Liquids	- Liquids are toxic and may impact the bio-physical environment depending on the spill quantity and containment.
Corrosive Substance ***Caustic liquid soda***	8. Corrosive Liquids	- Liquid is corrosive and may damage materials which it contacts causing weakening of structures and equipment

1.3. OEMP Context

1.3.1. Purpose of the OEMP

The primary purpose of this Operational Environmental Management Plan (OEMP) is to ensure activities at the BLBs are undertaken in accordance with good environmental practice. This OEMP also satisfies the operational conditions of the Major Project Approval MP07_0061 for BLB2, which are summarised in **Table 2**.

Table 2: Ongoing Operational Conditions of Approval MP07_0061 for BLB2

COA	DETAILS	WHERE ADDRESSED
2.9 Operation Noise Impacts	The Proponent shall minimise noise emissions from plant and equipment operated on the site by installing and maintaining, wherever practicable, efficient silencers and low-noise mufflers (residential standard)	Table 8
2.10 Operation Noise Impacts	The Proponent shall design, operate and maintain the project to ensure that the noise contributions from the project do not exceed the maximum allowable noise contributions specified in Table 1*, at those location and during those periods indicated. The maximum allowable noise contributions apply under: a.) Meteorological condition of wind speeds up to 3ms^{-1} (measured at 10 metres above ground level); or b.) Temperature inversion conditions up to 3^{o}C per 100 metres and wind speeds up to 2ms^{-1} (measured at 10 metres above ground level).	Table 8 and Section 2.1
2.11 Operation Noise Impacts	For the purpose of assessment of noise contributions specified under condition 2.10 of this approval, noise from the project shall be: a.) Measured at the most affected point on or within the residential boundary to determine compliance with the LAeq (15 minute) and LAeq (night) noise limits outlined in condition 2.10; and b.) Subject to the modification factors provided in Section 4 of the New South Wales Industrial Noise Policy (EPA, 2000), where applicable Notwithstanding, should direct measurement of noise from the premises be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the DECC (refer to Section 11 of the New South Wales Industrial Noise Policy (EPA, 2000)). Details of such an alternative noise assessment method accepted by the DECC shall be submitted to the Director-Genera; prior to the implementation of the assessment method.	Table 8 and Section 2.1
2.12 Soil and Water Impacts	The Proponent shall ensure that all stormwater on the working platform is directed to a stormwater treatment unit/pollutant trap capable of removing gross pollutants, oil, grease and sediments, prior to it being discharged to Botany Bay.	Table 6& 7
2.13 Soil and Water Impacts	The Proponent shall ensure that all oil and grease or other pollutants in the wastewater storage tank and the stormwater treatment unit is regularly collected and disposed of off-site at a waste management facility lawfully permitted to accept this waste.	Table 6 & 7
3.3 Hazard Audit	Twelve months after the commencement of operations of the project or within such period otherwise agreed by the Director-General, the Proponent shall carry out a comprehensive Hazard Audit of the project and within one month of its completion submit the audit report to the Director General. The audit shall be carried out at the Proponents expense by a duly qualified independent person or team approved by the Director General prior to the commencement of the audit. Further audits shall be carried out every three years or as determined by the Director General and a report of each audit shall be submitted to the Director General within one month of each audit completion date. All hazard audits shall be carried out in accordance with the Department of Planning's Hazardous industry Planning Advisory Paper No.5 – Hazard Audit Guidelines. Each audit shall include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit. Each audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Proponent intends to defer the implementation of a recommendation, justification must be provided.	Table 6 and 7
4.1 Compliance Tracking Program	The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall be submitted to the Director-General for approval prior to the commencement of construction. The Program shall relate to both construction and operational stages of the project and shall include, but not necessarily be limited to: a.) Provision for periodic review of the compliance status of the project against the requirements of this approval; b.) Provisions for the periodic reporting of compliance status to the Director-General; c.) Provisions for specific reporting requirements as required by conditions 4.2 and 4.3; d.) A program for independent environmental auditing at least annually, or as otherwise agreed by the Director-General, in accordance with ISO 19011:2002 – Guidelines for Quality and/or Environmental Management Systems Auditing; and e.) Mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance	Section 3.6

COA	DETAILS	WHERE ADDRESSED
5.1	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	Section 3.6
5.2 **Complaints Procedure**	Prior to the commencement of construction of the project, the Proponent shall ensure that the following are available for community complaints for the life of the project (including construction and operations); a.) A telephone number on which complaints about construction and operational activities at the site may be registered b.) A postal address to which written complaints may be sent; and c.) An email address to which electronic complaints may be transmitted. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.	Section 3.3
5.3 **Complaints Register**	The Proponent shall record details of all complaints received through the means listed under condition 5.2 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: a.) The date and time, where relevant, of the complaint b.) The means by which the complaint was made (telephone, mail or email) c.) Details of the complainant that were provided, or if no details were provided, a note to that effect d.) The nature of the complaint; e.) Any action(s) taken by the Proponent in relation to the complaint, including any follow up contact with the complainant; and f.) If no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the Director-General upon request.	Section 3.3
6.3 **OEMP**	Prior to the commencement of operation of the project, the Proponent shall prepare and submit for the approval of the Director-General an Operation Environmental Management Plan to detail an environment management framework, practices and procedures to be followed during the operation of the project. The Plan shall be consistent with the Department's Guideline for the Preparation of Environmental Management Plans (DIPNR 2004),and shall include, but not necessarily limited to: a.) A description of all activities to be undertaken on the site during operation of the project b.) Statutory and other obligations that the Proponent is required to fulfil during operation, including all approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies; c.) Specific consideration of measures to address any requirements of Council and the DPE during operation; d.) Details of the environmental performance of operations will be monitored and what actions will be taken to address identified adverse environmental impacts; e.) A description of the roles and responsibilities involved in the operation of the project and a program for how these employees will be trained in responsibilities identified in the plan; and f.) Complaints handling procedures to be applied during operation of the project (conditions 5.2 and condition 5.3 of this approval)	This document Section 1 Table 3 No requirements Tables 6 – 10 Section 1.7 Section 3.3
7 **Incident Reporting**	The Proponent shall notify the Director-General of any incident with actual or potential significant offsite impacts on people or the biophysical environment within 12 hours of becoming aware of the incident. The Proponent shall provide full written details of the incident to the Director-General within 24 hours of any incident or potential incident occurring. A further detailed report shall be prepared and submitted following investigations of the causes and identification of necessary additional preventative measures. The detailed report is to be submitted to the Director-General no later than 14 days after the incident or potential incident.	Section 3.4

1.3.2. Applicable Legislation

Table 3 defines the legislation that applies to the operation of BLB2. In the event of any inconsistency arising between the implementation of the OEMP and state or local government regulations, the regulatory requirements take priority.

Table 3: Acts of Legislation applicable to BLB2 Operations

LEGISLATION	INTENT	REGULATORY AUTHORITY
Environmental Planning and Assessment Act 1979	To assess the impact of the development's operations on the environment.	DPE
Marine Pollution Act 2012	To protect the State's marine and coastal environment from pollution by oil and certain other marine pollutants discharged from ships.	Transport for NSW (delegated to PANSW for Botany Bay)
Protection of the Environment Operations Act 1997	To regulate activities so as to prevent pollution of the environment	NSW EPA
Protection of the Environment Operations (Clean Air) Regulations 2022	Details the requirements a business is required to adhere to with the aim of ensuring the long-term quality of natural air.	NSW EPA
Protection of the Environment Operations (Noise Control) Regulations 2017	Details the requirements that a business is required to adhere to with the aim of controlling and minimising noise pollution.	NSW EPA
Protection of the Environment Operations (Waste) Regulations 2014	Gives specific details as to how businesses should manage any waste or by-products generated during business activities.	NSW EPA
NSW Noise Policy for Industry (EPA, 2017)	Specifies acceptable noise criteria and methodologies for monitoring industrial noise sources.	NSW EPA
NSW Biosecurity Act 2015	Specifies how to prevent, eliminate, manage or minimise biosecurity risks	NSW EPA
Commonwealth Biosecurity Act 2015	Requirements to manage biosecurity risk at designated first points of entry	Department of Agriculture Forests and Fisheries (DAFF)

1.4. OEMP Objectives

The objectives of the OEMP are to:

- Identify all appropriate environmental safeguards and demonstrate how they will be implemented on-site;
- Manage site activities effectively;
- Enable adverse impacts on the environment to be minimised;
- Provide for the conservation of the site's environment;
- Identify suitable emergency preparedness and response procedures;
- Provide details of complaints management procedures;
- Meet all requirements of relevant legislation and assist with ensuring compliance of the Project Approval; and
- Monitor and manage environmental and social impacts.

The OEMP is to be used in conjunction with the BLB Operations Manual, which also includes operational environmental procedures and controls, as well as safety and security measures.

1.5. Consultation

The initial version of the BLB2 OEMP (V1) was provided to Randwick City Council and the Environment Protection Authority (EPA) for review. No requirements or comments were provided to NSW Ports on the BLB2 OEMP.

1.6. HSE Policy

A copy of the NSW Ports Health, Safety and Environment (HSE) Policy is provided in **Appendix B**. This OEMP has been prepared consistent with that policy.

1.7. Roles and Responsibilities

All relevant staff and contractors employed and appointed by NSW Ports shall be formally advised of their obligations under the OEMP and informed of the significance of the OEMP. This process will be achieved via implementation of a site-specific induction.

In addition, responsibilities shall be outlined in position descriptions, Standard Operating Procedures, such as the BLB Operations Manual, BLB1 & BLB2 Safety Management System and generally integrated with various NSW Ports' environmental, safety and quality management systems such as the Port Botany Overarching Environmental Management Plan (PB EMP).

It is the responsibility of all workers on site to actively manage and respond to environmental risks and compliance. There is a duty of care to the environment by all personnel. All members within the chain of command are identified below, along with their roles and responsibilities, including environmental responsibilities.

Chief Executive Officer – NSW Ports

The CEO is responsible for ensuring that all operational activities are environmentally sensitive and sustainable.

General Manager, Operations and Environment

The General Manager, Operations and Environment, is responsible for the management and resourcing of the environmental and sustainability functions for NSW Ports, approving the OEMP and generally supporting the Port Operations Manager to deliver the objectives and controls of the OEMP.

The General Manager, Operations and Environment is also responsible for incident and emergency response; and supporting operational staff in the management of environmental risks and implementation of control measures.

Port Operations Manager

The overall operational responsibility for the BLBs lies with the Port Operations Manager. In addition, specific environmental responsibilities include:

- the development, implementation and review of the BLB Operations Manual. This Manual is intended to provide information on, and assign responsibilities to Berth Users, Terminal Operators, Shipping Agents, and ships masters, regarding port facilities; general conditions; safety, environmental & security requirements at the BLBs.
- oversight, training and management of the BLB officers.
- issue work permits for all approved work on the berths.
- general oversight for all checklists, defects records and sight Certificates and defects or maintenance issues are logged and communicated to NSW Ports Asset Management for attention.
- to promote consistent and coordinated emergency response between NSW Ports, Terminal operator and berth users and organise emergency response exercises at the BLBs.
- general oversight of OEMP compliance during operations.

Assistant Berth Operations Manager

The Assistant Berth Operations Manager reports directly to the Ports Operation Manager and is delegated with the day-to day execution of Port Operations Manager's responsibilities identified above.

Environment Manager

Reporting to General Manager, Operations and Environment, the Environment Manager is required to manage the environmental factors affecting NSW Ports and comply with applicable legislation and has the following responsibilities:

- Develop, implement and maintain this OEMP, including undertaking assessments and reviews of the OEMP, monitoring, recording and rectification for the OEMP and annual compliance reporting for the OEMP.
- Manage the environmental issues affecting NSW Ports, including impacts of NSW Ports' activities and developments.
- Provide environmental advice to minimise impacts on the community, and to protect the surrounding environment.
- Ensure compliance with government legislation and reporting requirements.
- Communicate environmental obligations to relevant internal and external stakeholders.
- Liaise with the community, port users, regulators and Port Lessor on environmental and sustainability matters.
- Assessment, monitoring, recording and rectification of the OEMP and sub-management environmental plans.
- Coordinate a response to any environmental community complaints
-

WHS & Risk Manager

The WSH & Risk Manager is required to manage the workplace health and safety obligations of NSW Ports and is responsible for the review of BLB licensees' WHS Management Plans.

BLB Officer

BLB Officers are currently trained in all responsibilities listed below for BLB1 and BLB2. Specific environmental responsibilities include:

- Control of security and access to the BLBs for authorised personnel only.
- Advising the Port Operations Manager (or delegate) of any non-compliance with this OEMP.
- Checking the berth is clear and clean before ship arrivals and after ship departures.
- Control fire-fighting equipment in the event of a fire or other emergency situations on the wharf or vessel.
- Control stormwater drainage from the wharf by completing the daily check of the spillage retrieval system.
- Monitor wind and weather conditions for the wharf and report all major changes to the Port Operations Manager (or delegate), the vessel and the operating company(s).
- Distribute and retrieve permits for work carried out on the berths or in the pipeline corridor
- Receive from the Port Operations Manager (or delegate), the list of substances to be transferred and the vessels overall Hazchem Code.
- Pre-set the firefighting system in accordance with the Hazchem Code information obtainable from the vessel entry in the ShIPS system or as instructed by the Port Operations Manager (or delegate).
- Place Hazchem Coding and IMDG Code Classification Plates on both Emergency Information Boards at the entrance to berth.
- Ensure that the Operating Companies provide current and correct Material Safety Data Sheets for all substances to be transferred and ensure they are placed in each terminals box in the amenities building hallway.
- Check spillage retrieval systems dump valve setting is appropriate for the cargo to be transferred, i.e. "OPEN" for LPG, "CLOSED" for all other cargoes. Check the spillage sump is free of any contamination and if not take corrective action.
- Check that the operating company has placed their lock/s together with Port Botany Operations Pty Limited lock on both valves of the spillage retrieval system and record non-compliances in the log book.
- Be prepared to proceed immediately to the Fire Control Room in the event of an emergency on the wharf or vessel, which requires the firefighting system.
- Decide in consultation with the Port Operations Manager (or delegate), Senior Shore Officer from the Operating Company and the ships Master, when to cease cargo transfer operation and disconnect the hoses or loading arm due to weather conditions as per the designated wind criteria in the ship/shore safety check list.
- Ensure the vessels emergency documents are returned to the vessel shortly before vessels departure.
- Complete Vessel Departure Check List (BLB Operations Manual Appendix 11 and attached to vessel's paperwork held by the Fire and Safety Officer.
- On departure of vessel ensure spillage retrieval sump pits are free of any liquid substances by obtaining a sample. If liquid substances are detected advise the operating company(s) and request immediate removal.
- If the sump pits and sample are clear of any spillage, unlock and open dump valve to allow storm water runoff.
- Receive from the operating company(s) a certificate of pipeline clearance. This will include acknowledgment that no spills have occurred and that the spillage sump is clear and all drip trays are empty and free of product. With the exception of the Operating Companies handling Bitumen, the Line Clearance Certificate must be left with the BLB Officer before the operators depart the berth.
- Ensure all emergency valves in pipeline corridor valve pit have been closed and locked and there has been no leakage from the pipelines or valves into the pit. Check and report to the Port Operations Manager (or delegate) if there is accumulation of combustible material or excessive build-up of water in the pit.

Tenants and Licensees

It is the responsibility of all port tenants and licensees to ensure that they are operating within the conditions of their lease or licence to ensure that their activities do not result in a breach of planning approvals, the *Protection of the Environment Operations Act 1997* and other legislation, where applicable. Those premises operating under an Environmental Protection Licence (EPL) issued by the EPA will be required to manage the environmental controls and reporting requirements under that licence. NSW Ports will work with tenants and licensees, where possible, to ensure they comply with all environmental laws and that their environmental management practices are consistent with this OEMP.

2. Environmental Risk Assessment and Implementation of Mitigation Measures

2.1. Risk Assessment

NSW Ports has assessed the environmental risks associated with activities that occur at the BLBs in accordance with its organisational framework for risk management (refer to **Table 5**). The level of risk associated with each environmental aspect is qualitatively described in terms of its Impact (i.e. severity or consequence) and it's Likelihood (i.e. probability or frequency). The risk ratings used in this process are shown in **Appendix C**.

Heritage

There are no items of heritage on the Bulk Liquids Berth sites.

Traffic

All traffic enters the BLBs via the existing BLB1 access point on Charlotte Rd. Any increases in truck movements associated with the greater throughput of chemicals, gases and petroleum products will be considered in development approvals for the user's storage facilities connected to the BLB1 and BLB2.

Noise

The BLBs operate 24 hours a day, seven days a week. Operations from the BLBs do not typically generate noise complaints due to the distances to sensitive receivers and the highly industrialised nature of the area. The operation of the facility also does not involve high noise generating activities, the only identified source of noise being the ship generators and on-board pump systems.

Note: The Project Approval for BLB2 stipulates the operational noise limits for the BLB2 at residential receivers as outlined in **Table 4**. A complaints system is in operation for both BLB1 and BLB2 to manage and respond to noise complaints should they arise. Further details are included in Section 2.2.3.

Table 4: Operational Noise Limits for Representative Residential Receivers

LOCATION	DAY / EVENING / NIGHT BULK LIQUIDS BERTH NO. 2 ONLY	DAY / EVENING / NIGHT BULK LIQUIDS BERTH 1 AND 2
	LAeq(15 minute) (dB(A))	LAeq(15 minute) (dB(A))
Botany Road, north of the Golf Club	35	38
Australia Avenue	35	38
Wassel Street/Military Road	35	38
Elaroo Avenue	35	38

Biosecurity

The Bulk Liquids Berths at Port Botany have been assessed under the First Point of Entry Requirements biosecurity outcomes under the *Biosecurity Act 2015* and the *Biosecurity Regulation 2016*. The requirements of that assessment have been incorporated where relevant into this OEMP and biosecurity management is detailed in **Table 10** in Section 2.2.5.

Table 5: Aspects and Impacts Risk Assessment

ACTIVITY	ASPECT	IMPACT	UNCONTROLLED RISK			MITIGATION MEASURES (REFER TO TABLES FOR DETAILS)	RESIDUAL RISK		
			S	L	Risk		S	L	Risk
Cargo Handling & Stevedoring - general	Machinery and cargo handling noise	1. Noise pollution complaints	3	5	High	Table 8	2	4	Significant
	Leaks, spills and emissions from chemical and petroleum storage facilities	1. Soil pollution - hydrocarbons	3	3	Significant	Table 7	2	2	Low
		2. Groundwater pollution - hydrocarbons	3	3	Significant	Table 7	2	2	Low
		3. Air pollution – odour, VOCs	3	4	Significant	Table 8	2	3	Moderate
	Exhaust emissions to air	1. Air pollution - excessive PM, NOx, SOx	1	4	Moderate	Table 8	1	2	Low
	Importing cargo with exotic pests	1. Biosecurity incursion	3	5	High	Table 10	2	3	Moderate
Cargo Handling & Stevedoring - Dangerous Goods and Hazardous Substances	Uncontrolled release due to leak, spill or other emergency, including pipeline failures or leaks	1. Injury to humans	4	3	High	WHS Systems	4	1	Significant
		2. Air pollution - toxicant	3	2	Moderate	Table 8	3	1	Moderate
		3. Water pollution – toxicant	4	3	High	Table 6	4	1	Significant
		4. Soil pollution - toxicant	3	3	Significant	Table 7	3	2	Moderate
Cargo Handling – Bulk Liquids, Dangerous Goods and Hazardous Substances	Fire/explosion risk	1. Injury to humans	5	3	High	WHS Systems	5	1	Significant
		2. Air pollution – smoke/fumes	4	3	High	Table 8	3	1	Moderate
	Use of fire fighting foams	1. Human health - toxicant	4	2	Significant	WHS Systems	3	2	Moderate
		2. Water pollution – toxicant	4	2	Significant	Table 6	3	2	Moderate
		3. Soil pollution - toxicant	4	2	Significant	Table 7	3	2	Moderate
		4. Groundwater pollution - toxicant	4	2	Significant	Table 7	3	2	Moderate
Maintenance regimes	Noxious weed incursion	1. Loss of biodiversity	2	3	Moderate	Table 10	2	2	Low
Building works	Disturbance of materials containing asbestos	1. Air pollution – asbestos	3	3	Significant	Table 8	2	2	Low
		2. Human health – respiratory illness	4	3	High	WHS Systems	4	1	Significant
		2. Loss of fauna habitat	3	3	Significant	Table 10	2	2	Low

Operation of Vehicles, Plant and Equipment	Machinery noise	1. Noise pollution	2	4	Significant	Table 8	1	3	Low
Maintenance and operation – Vehicles, Plant and Equipment	Fuel & oil spills & leaks	1. Land pollution - hydrocarbons	2	4	Significant	Table 7	2	2	Low
		2. Water pollution – hydrocarbons	2	3	Moderate	Table 6	2	1	Moderate
Shipping	Ballast water and biofouling introducing marine pests	1. Loss of biodiversity	4	3	High	Table 10	4	1	Significant
	Waste disposal	1. Water pollution - various	2	3	Moderate	Table 6 Table 9	2	2	Low
		2. Biosecurity risk	3	3	Significant	Table 10	2	2	Low
	Air emissions from ships	1. Air pollution – excessive PM, NOx, SOx	1	4	Moderate	Table 8	1	3	Low
	Noise emissions from ships	1. Noise pollution complaints	1	2	Low	Table 8	1	2	Low
	Oil Spill	1. Water pollution - oil	4	3	High	Table 6	3	3	Significant
		2. Aquatic fauna damage - oil	4	3	High		3	2	Moderate
	Chemical Spill	1. Water pollution - chemical	4	3	High		4	1	Significant
Stormwater/Wastewater/ Sewerage Management **Ship to Shore transfer of product**	Discharge to waters Hoses, MLA and pipeline failures	1. Water pollution - gross pollutants	2	5	Significant	Table 6	1	3	Low
		2. Water pollution - sediment / turbidity	2	5	Significant		1	3	Low
		3. Water pollution - hydrocarbons	3	4	Significant		1	3	Low
		4. Water pollution - nutrients	1	4	Moderate		1	2	Low
		5. Water pollution - pathogens	2	4	Significant		1	2	Low

2.2. Environmental Aspects and Mitigation Measures

Environmental control measures are implemented prior to undertaking activities which are likely to generate environmental risks or impacts and maintained as long as is necessary to control the risk or impact. Some control measures will be implemented periodically (e.g. inspections and routine maintenance tasks). The frequency of periodic measures will be determined according to relevant obligations, standards, codes of practice and/or guidelines. Contingency or remedial measures will be implemented as required to address impacts when they occur.

Table 6 to Table 10 outline the environmental objectives, control measures, monitoring and reporting requirements for each of the identified environmental aspects that apply to BLBs.

2.2.1. Stormwater & Water Quality Management

TABLE 6 - STORMWATER AND WATER QUALITY MANAGEMENT

Environmental Objectives

To avoid detrimental impact on the water quality and marine environment of Botany Bay.

To maintain and protect the integrity of Botany Bay and other waterways.

To comply with the following legislation:

- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations Regulation 2022*
- *Environmental Planning and Assessment Act 1979*
- *Marine Pollution Act 2012*
- SafeWork NSW Health and Safety Requirements

Potential Environmental Impacts

1. Detrimental impact on the water quality and marine environment of Botany Bay
2. Non-compliance with legislative requirements

Control Measures	Responsibility
To minimise spills from ships at berth:	
- Ships to sail at low speed past the BLB and to be under tug and PANSW pilot control at all times	PANSW
- Fixed fenders will be maintained on the wharf to provide cushioning should excessive impact with the wharf occur	NSW Ports Asset Manager (AM)
- A marine exclusion zone is in force around the BLBs (no unauthorised vessels in BLB area)	BLB Officers / PANSW
- Transfers will cease in high wind speeds (hoses isolated) and when lightning occurs	BLB Officers
To minimise leaks and spills from pipelines/equipment:	
- Fire safety system testing and critical equipment checks will occur prior to ships commencing transfer	Port Operations Manager (POM) or delegate
- All hoses will be pressure tested annually and tested with nitrogen prior to each use	Operating Terminals
- New gaskets will be used for each transfer	Operating Terminals
- Operator will ensure the hoses used are rated appropriately for the pressure/ service	Operating Terminals
- The start-up procedures include monitoring the pressuring of hoses including leak detection	Operating Terminals
- Manual shut down valves are located at each end of the flexible hose and an emergency shutdown is installed in the base of the MLA	Operating Terminals
- Hydrostatic testing of pipes and commissioning is to be conducted as per Operating Terminals' procedures (typically every two years or when maintenance is performed on pipelines);	Operating Terminals / POM or delegate
- Pipes are to be empty and liquid free between transfers	Operating Terminals
- MLA connections will be pressure tested as per Operating Terminal's procedures	Operating Terminals
- The MLA start up procedure includes a staged pressurisation and monitoring to detect any leaks	Operating Terminals
- An operator will be stationed in the vicinity of the transfer point to respond to any incidents and initiate isolation of the transfer in the event of an incident	Operating Terminals
- All equipment will be classified to AS60079 (Hazardous Area Classification) to eliminate ignition sources in the wharf area	POM or delegate / Operating Terminals
- Remote-control operated fire monitors are located on the wharf and a fire water pump station is located on the shore (diesel duty/stand-by)	POM or delegate

TABLE 6 - STORMWATER AND WATER QUALITY MANAGEMENT

To minimise the impact of spills on the environment:

- The working platform is to be bunded and closed off when bulk liquid pumping is being undertaken. When BLBs are vacant, the working platform will be checked beforehand to ensure no residual spills and stormwater run-off on the platform would be discharged to Botany Bay. When pumping operations are underway, the bund drain valve would be closed and any liquid within the bunded area sump would be inspected to determine whether to discharge to sea or to drain to the wastewater storage tank. All stormwater accumulated in the bunds passes through an oil separator and gross pollutant trap system before being discharged to Botany Bay, even if it is sighted to be clean.	BLB Officer
- All staff and contractors will comply with the spill response procedures outlined in Section 3.5.	POM or delegate
- BLB staff and operating terminals will participate in annual emergency exercises and drills and testing of safety equipment.	POM or delegate
- Spill kits are available at the end of the wharf and will be maintained by BLB Officers.	BLB Officer
- An oil boom facility is readily available to be deployed from the nearby Brotherson Dock	PANSW

To minimise the impact of marine pests and biofouling:

- Ballast water and hull fouling from visiting ships would continue to be managed as per DAFF requirements – i.e. no unapproved release of ballast water into Botany Bay	POM or delegate
- No hull cleaning is permitted, excluding propeller polishing.	POM or delegate

Monitoring	**Responsibility**
- Trained terminal operators are in attendance during the full product transfer cycle to monitor all equipment for leaks and the potential for spills to occur, and have full radio communication with the wharf and shore operations.	BLB Officer
- Regular visual inspection, including CCTV of the water and wharf areas will be undertaken during operations to ensure there is no accidental spillage of materials into the Bay.	BLB Officer
- Hazard auditing of BLB2 every 3 years in accordance with CoA 3.3	POM or delegate

Reporting	**Responsibility**
- If accidental spillage of products, waste, chemicals or fuels occurs with the potential to discharge into Botany Bay this shall be immediately reported to NSW Ports Port Operations Manager and PANSW VTS	BLB Officer
- All monitoring data and maintenance records shall be available to the regulating authority on request.	POM or delegate
- In the event of a major spill or release of pollutants from the site, the incident will be reported in accordance with the notification requirements set out in Section 3.5 of this OEMP.	All staff / operating terminals / contractors
- **Triennial Audit Reports will be available on the NSW Ports website.**	NSW Ports Environment Manager (EM)
- All documents required under the project approval will be available for public inspection on request (subject to confidentiality).	POM or delegate

Performance Indicators

- Stormwater discharge requirements are met.
- No spills resulting in detrimental impact on the water quality and marine environment of the local area.

Corrective Actions

Non-conformance with this OEMP shall be documented and corrective action request will be issued through NSW Ports Action Register.

Corrective actions may include:

- Updating operating procedures and associated documentation (such as this OEMP) as a result of a non-conformance
- Feedback from emergency exercises will be incorporated into operating procedures should unacceptable risk be identified.
- Re-training staff in the event of a non-conformance to address the area of skills lacking
- Review the effectiveness of the induction training program
- Corrective works in the event of a design flaw/malfunction of the BLB facilities

2.2.2. Soil and Groundwater Quality Monitoring

TABLE 7 - SOIL AND GROUNDWATER QUALITY MANAGEMENT

Environmental Objectives

To avoid contamination of the soil and groundwater around the BLBs.

To reduce the likelihood of exposure to existing contaminated soil and groundwater.

To comply with the following legislation:

- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations Regulation 2022*

Potential Environmental Impacts

1. Contamination of the soil under the BLB1 & BLB2 pipeline corridors
2. Contamination of the groundwater on the BLB1 & BLB2 landside area

Control Measures	Responsibility
- Leakages from pipes and hoses will be minimised by monitoring pressure and regular inspections	Operating Terminals
- All staff and contractors will comply with the spill response procedures outlined in Section 3.5.	All staff / contractors
- In the event that contaminated groundwater is discovered, a groundwater management plan and remediation plan will be developed	Environment Manager
- Appropriate disposal of any contaminated soil or water will be undertaken in accordance with OEH waste management guidelines	POM or delegate
- Any excavations undertaken on the BLB2 site that will reach depths of 1 metre or greater will require the preparation of an Acid Sulphate Soils Management Plan.	NSW Ports AM / NSW Ports EM

Monitoring	Responsibility
- Regular visual inspection of the ground around the wharf and under the pipelines will be undertaken to ensure there is no accidental spillage of materials onto the ground.	POM or delegate
- Hazard auditing every 3 years in accordance with CoA 3.3	POM or delegate

Reporting	Responsibility
- In the event of a major spill or release of pollutants from the site, the incident will be reported in accordance with the notification requirements set out in Section 3.5 of this OEMP.	All staff / operating terminals / contractors
- All monitoring data and maintenance records will be available to the regulating authority on request.	POM or delegate
- **Triennial Audit Reports will be available on the NSW Ports website.**	NSW Ports EM
- All documents required under the project approval will be available for public inspection on request (subject to commercial confidentiality).	POM or delegate

Performance Indicators

- No spills resulting in detrimental impact on the groundwater and soil of the BLB area.
- No increase in contamination as a result of BLB operations

Corrective Actions

Non-conformance with this OEMP shall be documented and corrective action request will be issued through NSW Ports Action Register.

Corrective actions may include:

- Updating operating procedures and associated documentation (such as this OEMP) as a result of a non-conformance
- Feedback from emergency exercises will be incorporated into operating procedures should unacceptable risk be identified.
- Re-training staff in the event of a non-conformance to address the area of skills lacking
- Review the effectiveness of the induction training program
- Corrective works in the event of a design flaw/malfunction of the BLB facilities

2.2.3. Local Amenity (Noise and Air Quality) Management

TABLE 8 - LOCAL AMENITY (NOISE AND AIR) QUALITY MANAGEMENT	
Environmental Objectives	
To minimise operational noise impact on nearby sensitive receptors. To minimise air quality impacts, including odour on nearby sensitive receptors. To ensure compliance with the following legislation: - *Protection of the Environment Operations Act 1997* - *Protection of the Environment Operations (Noise Control) Regulation 2017* - NSW Noise Policy for Industry (EPA, 2017) - *Protection of the Environment Operations (Clean Air) Regulation 2022* To ensure that the noise limits specified in the condition are complied with.	
Potential Environmental Impacts	
1. Noise nuisance to surrounding sensitive receivers 2. Reduced air quality and odour nuisance for surrounding sensitive receivers	
Control Measures	**Responsibility**
- BLB officers will investigate ships that are emitting excess/abnormal amounts of noise and/or emissions	BLB Officer
- Ensure noise levels from operations are below a night-time noise criterion of 40 dB(A) at the nominated locations in Table 4, Section 2.1	POM or delegate
- Any plant and equipment on site will be correctly maintained and fitted, where practicable with efficient silencers and low-noise mufflers (residential standard).	POM or delegate
- Where available, EPA approved vapour emission controls will be used on operational vehicles and equipment	POM or delegate
Monitoring	**Responsibility**
- A noise audit will be undertaken within 90 days of the commencement of operations in a period where the facility is operating under normal conditions and will include the requirements listed under Condition 3.1.	NSW Ports EM
- Noise measurements will take place at the most affected point on or within the residential boundary at the locations described in Table 1 and subject to the relevant conditions listed in Condition 2.11.	NSW Ports EM
Reporting	**Responsibility**
- The noise audit report will be provided to the required regulatory authorities and will identify non-compliances (if any) and detail additional measures as per Condition 3.2.	NSW Ports EM
- Records of all noise and air quality related complaints will be kept and responded to and corrective actions implemented where possible.	NSW Ports EM
- **Triennial Audit Reports will be available on the NSW Ports website.**	NSW Ports EM
- All documents required under the project approval will be available for public inspection on request (subject to confidentiality).	POM or delegate
Performance Indicators	
- No valid noise complaints received in relation to operation of the BLBs - No exceedance of noise limits specified in Table 4 - No valid air quality complaints received in relation to operation of the BLBs - No offensive odours to be emitted beyond the boundary of the site unless otherwise permitted by an Environmental Protection Licence	
Corrective Actions	
Non-conformance with this OEMP shall be documented and corrective action request will be issued through NSW Ports Action Register. Corrective actions may include: - Reporting of excessively noisy/smoke emitting ships to the vessel operators - Updating operating procedures and associated documentation (such as this OEMP) as a result of a non-conformance - Re-training staff in the event of a non-conformance to address the area of skills lacking - Review the effectiveness of the induction training program - Corrective works in the event of a design flaw/malfunction of the BLB facilities	

2.2.4. Waste Management

TABLE 9 - WASTE MANAGEMENT	
Environmental Objectives	
To minimise waste generated at the site and reduce the volume of waste requiring disposal to landfill. To prevent disposal of waste from the site to receiving environments. To ensure compliance with the following legislation: - *Protection of the Environment Operations Act 1997* - *Protection of the Environment Operations (Waste) Regulation 2014* - EPA Waste Classification Guidelines 2014	
Potential Environmental Impacts	
1. Litter entering surrounding marine environment (Botany Bay) 2. Waste not sent to correct waste facilities or being recycled 3. Wastewater entering Botany Bay	
Control Measures	**Responsibility**
- Waste minimisation will occur according to the hierarchy of avoidance, reuse, recycle and disposal. Where possible, recyclable waste will be segregated and sent to appropriate facilities for recycling	BLB Officers / NSW Ports AM / operating terminals
- On-site waste storage facilities of suitable scale and number shall be provided. All external rubbish bins are to comply with the development guidelines for the relevant statutory authorities' requirements.	NSW Ports AM
- All waste disposal will occur in accordance with the EPA Waste Classification Guidelines.	BLB Officer / NSW Ports AM / Operating Terminals / Ships agents
- Ensure correct handling and storage of hazardous wastes and removal/disposal by licensed contractor to approved facility.	BLB Officer / Operating Terminals / Ship agents
- Wastewater from the bunds will be collected in the wastewater storage tank and analysed before being released. If contaminated, the water will be treated and disposed of in accordance with the EPA Waste Classification Guidelines	
Monitoring	**Responsibility**
- Regular inspections of the wharf area shall be undertaken to ensure there is no ground waste that could be washed into the Bay in a rain event.	BLB Officer
- Inspections of wastewater in the bunds will take place before being released or disposed of.	BLB Officer
- Monitoring and tracking of waste is discussed in Section 3.4	
Reporting	**Responsibility**
- Failure of any aspect of the waste management system shall result in a review of the reasons for the failure and the implementation of corrective actions.	POM or delegate
- All documents required under the project approval will be available for public inspection on request (subject to confidentiality).	POM or delegate
- **Triennial Audit Reports will be available on the NSW Ports website.**	NSW Ports EM
Performance Indicators	
- Absence of visual waste and litter accumulating on the site - No contaminated wastewater discharged into Botany Bay - Compliance with the Work Health and Safety Act 2011, regulations for waste management and public health and the guidelines for relevant statutory authorities. - Compliance with Australian Quarantine Act and Regulations	
Corrective Actions	
Any waste spillage that occurs on-site shall be cleaned up immediately using appropriate methods. If required, the responsible entity shall arrange professional cleanup services. If a failure in the waste management system has occurred (as a result of a spillage or extensive littering), the identified failure in the waste management procedure shall be identified and corrected. Corrective actions may include: - Updating operating procedures and associated documentation (such as this OEMP) as a result of a non-conformance - Re-training staff in the event of a non-conformance to address the area of skills lacking - Review the effectiveness of the induction training program - Corrective works in the event of a design flaw/malfunction of the BLB facilities	

2.2.5. Biosecurity Management

TABLE 10 - BIOSECURITY

Environmental Objectives

To minimise impacts on the flora and fauna of Port Botany and port land.

To ensure compliance with the following legislation:

- *Threatened Species Conservation Act 1995*
- *National parks and Wildlife Act 1974*
- *Fisheries Management Act 1997*
- *Noxious Weeds Act 1993*
- *Environment Protection and Biodiversity Conservation Act 1999*
- *NSW Biosecurity Act 2015*
- *Commonwealth Biosecurity Act 2015*

Potential Environmental Impacts

1. Noxious weed incursion
2. Noxious pest or other vertebrate/invertebrate species to land or water

Control Measures	Responsibility
- Develop and maintain a Biosecurity Incident Response Procedure (BIRP) in consultation with the Department of Agriculture Forest and Fisheries (DAFF)	NSW Ports EM
- Implement weed control programs in accordance with the requirements of the Noxious Weeds Act	NSW Ports AM
- Implement appropriate pest eradication programs	BLB Officer / Operating Terminal / Ships agents
- Notify Biosecurity agents of any suspected invasive or exotic pests in cargo and work with them to control/prevent an incursion	NSW Ports EM
- Provide biosecurity identification training to operational staff and contractors to assist in identifying and responding to potential biosecurity threats	BLB Officer / Operating Terminal / Ships agents
- Ballast water and hull fouling from visiting ships would continue to be managed as per DAFF Biosecurity requirements – i.e. no unapproved release of ballast water in port waters	Ships agents / BLB Officer
- No hull cleaning is permitted, excluding propeller polishing	NSW Ports EM
- Permethrin-based knockdown insecticide is maintained and accessible to berth users.	
- A biosecurity waste receptacle is available in the event that there is spillage of goods subject to biosecurity control in the port precinct.	POM or delegate POM or delegate

Monitoring	Responsibility
- Visual inspections of landside areas for weed and pest incursions - Visual inspections during loading/unloading activities on the ship and berth	BLB Officer

Reporting	Responsibility
- Failure of any aspect of the waste management system shall result in a review of the reasons for the failure and the implementation of corrective actions.	POM or delegate
- **Triennial Audit Reports will be available on the NSW Ports website.**	NSW Ports EM
- All documents required under the project approval will be available for public inspection on request (subject to confidentiality).	POM or delegate

Performance Indicators

- Absence of weed and pest incursions
- Compliance with First Point of Entry Requirements for Biosecurity risks

Corrective Actions

Corrective actions may include:

- Updates to the Biosecurity Procedures may be required following any weed or pest incursions if faults within the procedures are identified
- Updating associated documentation (such as this OEMP) as a result of a non-conformance
- Re-training staff in the event of a non-conformance to address the area of skills lacking
- Review the effectiveness of the induction training program

3. Environmental Management Procedures

3.1. Environmental Monitoring and Inspections

Table 11 outlines the Environmental Monitoring and Inspection Programs currently in place for BLB2 being undertaken by NSW Ports Asset Management Team. In addition to the targeted inspections identified in **Table 11** NSW Ports managers and WHS Committee members undertake quarterly Workplace Health & Safety Inspections of common areas and areas occupied by NSW Ports during which environmental hazards and impacts may be reported.

Table 11 - Environmental Monitoring and Inspections

FACILITY/LOCATION	ASPECTS	FREQUENCY	METHOD	REFERENCE / RECORDS
Non-tenanted areas (e.g. roads, vacant land, gardens/green space) throughout port	Waste dumping	Weekly	Visual inspection	MEX system
	Noxious weeds	Monthly	Visual inspection	MEX system
	Stormwater drains and treatment devices	Annual	Visual inspection and pump out of GPT and separator	MEX system
	Landscaping / pesticide use	As needed	Visual inspection, application of pesticides	MEX system
Bulk Liquids Berths	Fire hydrants	Annual	Visual inspection	MEX system
		3 yearly	Hydrant flow	MEX system
	Spill containment systems	Daily or as needed	Visual inspection to release rainwater	BLB Operations Manual / The Hold
		Annual	Inspection of valves	

Each BLB User is also required to undertake routine inspections, monitoring and maintenance inspections of their respective BLB equipment (e.g. Mechanical Loading arms) and pipelines.

3.2. Induction and Training

All staff and contractors working at the site will need to complete the NSW Ports' BLB1 & BLB2 induction course prior to commencing any work or activity at the BLB2. The site-specific induction course will include:

- Control procedures for operational activities that can be followed to minimise environmental impacts (as outlined in the OEMP)
- Site layout
- Safety procedures
- Hazardous materials and their safe use
- Environmental emergency response procedures
- Fire fighting
- Fuel handling and spillage
- Biosecurity response requirements from relevant government departments
- Documentation systems

This will foster an awareness of environmental issues, minimise environmental impacts and inform staff and contractors of their responsibilities and duties.

In addition to this, all NSW Ports staff undergo environmental training based on their level of involvement with environmental aspects as part of their employment position.

3.3. Complaints Response Procedures

This procedure applies to communications directed to NSW Ports' staff and contractors with regards to port activities at the BLBs. Community/stakeholder complaints and general enquiries could be received through a number of avenues.

The contact details for the public to make general enquiries or lodge complaints about operations at Port Botany are:

- Office Hours (0830 – 1600 Monday to Friday)
- Telephone: 1300 922 524 (NSW Ports switchboard)
- Postal: PO Box 297, Botany NSW 1455
- Email: enquiries@nswports.com.au
- Online at: www.nswports.com.au/contact

All general queries will be forwarded through to the relevant NSW Ports staff member who will respond or disseminate to other staff as appropriate. Early resolution to any complaints will be sought, a response provided and effort made to resolve the query/complaint in a timely manner. All environment queries will be directed to the Environment Manager.

NSW Ports website also has an online form on the 'Contact Us' page of the NSW Ports website for members of the public to register environmental concerns such as noise and odour.

Outside of Office Hours/Emergencies

Out of office hours enquiries that are directed to the NSW Ports switchboard are requested to leave a message which is responded to the following business day. The NSW Ports switchboard recorded message includes an option in the event of an emergency outside of office hours to divert to the NSW Ports BLB Office, which is staffed 24 hours a day, seven days a week. The BLB Officer has a call-out list of personnel to respond to urgent enquiries, incidents and emergencies.

All complaints received by NSW Ports will be recorded in the NSW Ports proprietary electronic Protecht Complaints Register. The information captured in this register will include:

- date and time of the contact or complaint;
- means by which the contact or complaint was made (telephone, mail or email);
- any personal details of the individual who provided the information or complaint, or if no details were provided, a note to that effect;
- the nature of the comment or complaint;
- record of operational and meteorological condition contributing to the comment or complaint;
- any action(s) taken by NSW Ports in relation to the comment or complaint; including any follow-up contact with the individual who provided the information or complaint;
- if no action was taken by NSW Ports in relation to the comment or complaint, the reason(s) why no action was taken.

3.4. Waste Management Procedures

Table 12 describes how waste from activities at the BLBs is disposed of, recorded and / or tracked.

Table 12 – Waste Management Procedures

ACTIVITIES	WASTES TYPES	PROCEDURE FOR DISPOSAL AND TRACKING
BLB Office activities	Paper and general waste generation	Contractors managed by Asset Management Team Recorded in MEX system Waste Contractor provides monthly waste reports to Sustainability Manager
BLB Maintenance activities	Oils and lubricants used in maintenance of fire-fighting system, scrap metal and other construction waste.	Contractors managed Asset Management Team Tracked and recorded in Holdsystem
Stormwater Drains, Gross Pollutant Traps, Culverts and bunds	Oily waste water, sediments and general waste	Contractors managed Asset Management Team Tracked and recorded in Hold system

3.5. Emergency Contacts and Incident Response

The requirements for effective emergency management at the BLB are described in detail in the BLB Operations Manual (Section 9). BLB Emergency Response Procedures (Appendix A of the BLB Operations Manual) provide detailed instructions for responding to a range of specific emergency scenarios including: fire on the wharf platform; fire on a ship or surrounding water; spill on wharf, ship or into the water; gas leak; fire or spill on pipe bridge or road bridge; fire or spill in Charlotte or Fishburn Road pipeline corridor or in the isolation valve pit; security threat.

More general processes for incident notification and coordination of emergency response are set out in the Port Botany Emergency Response and Incident Management Plan (ERIMP).

All tenants operating at the BLBs are required by the POEO Act to have a Pollution Incident Response Management Plan (PIRMP) for all their activities, including those at the BLBs. Environmental incident and emergency response procedures at the BLBs are summarised in the following subsections.

3.5.1. Environmental Incident Classification

Environmental incidents are classified as being one of three levels of incidents:

- **Minor:** Incidents are generally able to be resolved through the application of local or initial resources only (e.g. first-strike capacity), doesn't trigger any obligations to report under Environmental Law[1].
- **Notifiable**: triggers an obligation to report the incident to government authorities under Environmental Law (refer to Section 3.5.3), or an incident which results in a formal regulatory response (e.g. clean up notice, formal warning, penalty notice, prosecution) from a government agency.
- **Emergency:** Imminent threat of major harm to human health or environment, requires immediate assistance of specialist agencies plus notifications to regulators and NSW Ports. Incidents are generally characterised by a degree of complexity that requires the responsible party to report to external jurisdictions and response coordination may be supported by numerous parties and resources.

3.5.2. Incident and Emergency Response Procedure

Tenants/licensees and BLB Officers are required to notify NSW Ports Port Operations Manager (or delegate) in the event of any notifiable or emergency incident or when significant pollution has occurred.

Tenants/licensees are responsible for the clean-up, reporting and follow up response for any pollution incidents that have occurred as a result of their activities. NSW Ports is responsible for the clean-up of any pollution incident as a result of its activities. Where a pollution incident has occurred on port land, NSW Ports will undertake the following steps:

1. Where required by environmental law, notify the relevant Government Authority (if not undertaken by the tenant);
2. Take all reasonable steps to protect every person and the environment from exposure to the pollution incident, until the nature and cause of the pollution incident has been identified and any Clean-Up Action has been completed (if required) to the reasonable satisfaction of Port Lessor and any relevant Government Authority that was or should have been notified;
3. Ensure any appropriate Clean-Up Action necessary to clean up the air pollution, land pollution or water pollution that results from the pollution incident caused by a tenant or NSW Ports is undertaken, as well as ensure rehabilitation of the surrounding environment is undertaken if necessary;
4. Promptly comply with any reasonable notice, order or direction of any Government Authority in relation to any Pollution Incident at the Leased Area (but only to the extent to which NSW Ports has caused or contributed to the Pollution Incident)

[1] **Environmental Law** means:

(a) all Laws relating to the Environment, noise, development, construction of structures, health, Contamination, radiation, Pollution, waste disposal, land management and Hazardous Materials;

(b) all conditions of all Approvals issued under any Law described in paragraph (a); and

(c) regulations and any lawful order, legally binding guideline, notice, direction or requirement of any Government Authority in relation to the matters described in paragraph (a) or (b).

3.5.3. Incident and Emergency Notification and Reporting

In accordance with the POEO Act, as detailed in tenant PIRMPs, any person carrying on the activity (including the occupier of the premises or the employer) which causes a pollution incident which causes material harm to the environment or threatens such harm is to notify immediately each relevant authority as identified in the procedure below.

Appendix D contains the phone numbers of the relevant government agencies and emergency services that may be required to be contacted during and in response to an emergency. Details are also provided in the BLB 1 & 2 Emergency Plan.

The procedure for notification in the event of an incident or emergency is to call 000 in the first instance if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police, the NSW Ambulance Service and PANSW (for waterside pollution incidents only) are the first responders, as they are responsible for controlling and containing incidents. If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order:

- The Environment Protection Authority (EPA)
- The Ministry for Health via the Local Public Health Unit
- The SafeWork NSW
- Randwick City Council

NSW Ports will notify the NSW Planning Secretary of any incident with actual or potential significant off-site impacts on people or the bio-physical environment within 12 hours of occurring. Written details will be provided within 24 hours of the incident or potential incident occurring and a further detailed report containing information on causes and additional necessary preventative measures will be submitted no later than 14 days after the incident or potential incident.

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW.

In addition, NSW Ports is required to notify Transport for NSW (TfNSW), the Harbour Master (PANSW) and any Relevant Authority (having jurisdiction or power in relation to a Facility) of any Pollution Incident reported on or near a Facility as defined under Maritime Facilities Deed.

3.5.4. Spill Response Procedures

The design features of the BLBs ensures that spills that occur on the wharf and landside areas are contained and prevented from entering the waters of Botany Bay. Two spill containment areas (bunds) are located on the deck situated at the manifold area (inner bund) and the entire working platform (outer bund).

The inner bund is intended to contain any accidental minor spills or leaks of petroleum or other chemicals. This bunded area is connected to a collection sump which can be pumped to a wastewater storage tank on land. The working platform is provided with a 200mm high continuous vehicle kerbing around the entire deck (this is the outer bund). The access road has a trafficable ramp, 200mm high, as part of the bund system.

If there are no unloading/loading operations occurring, the bunds are left open and any stormwater is discharged to Botany Bay. All stormwater accumulated in the bunds passes through an oil separator and gross pollutant trap system before being discharged to Botany Bay, even if it is sighted to be clean.

3.5.5. Spill into the water

In the event of a spill from a ship into the waters of Botany Bay, the first step is for the BLB officers with the assistance of the ship's crew to isolate the cause of the spill and prevent as much product from entering the water as possible. The next step is to notify PANSW VTS centre on 02 9296 4003 which has trained staff and equipment (such as oil booms) on duty 24/7at Brotherson Dock for rapid deployment. PANSW have developed a comprehensive spill response manual and procedures for Port Botany operations and other resources are available to respond to spills into the ocean. PANSW have the following responsibilities in Botany Bay:

- Administer dangerous goods transported in marine waters;
- Provide a 24 hour emergency response crew for spills into marine waters;
- Clean up and investigation of spills;
- Prosecution of spill offenders; and
- Provide 24 hour port communication.

PANSW personnel are trained in spill containment and recovery of spilt materials with emergency exercises conducted at least annually. In the event of a spill, NSW Ports will make staff available to participate in the Incident Response Team under the direction of PANSW.

3.5.6. Spill on the landside/bunded areas

During ship unloading, any liquid (i.e. product) that enters the bunded area is deemed to be potentially contaminated and is pumped to the storage tank for treatment and/or disposal to an approved waste handling facility.

All stormwater from the working platform that is collected during the loading/unloading operations is initially visually assessed to determine whether it is free from pollution. Clean stormwater is suitable for release to Botany Bay, however, if any contamination is detected, the stormwater is diverted to the wastewater storage tank. Water from the wastewater storage tank is then tested (if required), classified according to the DECC waste management guidelines and then disposed of at an appropriately licensed liquid waste management facility appropriate facility.

In the event of a significant spill on the work platform, the liquid material will be pumped out from the bund to the wastewater storage tank and/or an approved waste road tanker and taken off-site for appropriate disposal.

In the event of a minor spill, the spilled liquid will be cleaned up by operational personnel using spill kits that are located at the end of the wharf. All BLB officers are trained in the use of spill kits.

Once loading/unloading operations have ceased, the bunded areas are visually assessed to determine whether the area is free from product spills.

NSW Fire and Rescue via its Hazmat Response Unit is the lead combat agency for any landside spill emergency which cannot be readily contained and managed by the polluter.

3.5.7. Biosecurity Incidents

A biosecurity incident is an unintentional, unforeseen, or uncontrolled exposure to exotic pests, foreign organic material, or diseases. A Biosecurity Incident Response Procedure (BIRP) has been developed in consultation with the relevant government departments. The BIRP is provided in **Appendix E**. The BIRP will be reviewed and updated every two years or in response to feedback from NSW Ports, biosecurity events/incidents and consultation with government authorities.

3.5.8. Incident Records

All environmental incidents and emergencies that occur within the Port Area (i.e. on NSW Ports managed areas and tenanted/licensed areas when notified to NSW Ports) will be recorded in the NSW Ports Protecht Incident Register. Tenants and licensees within the Port Area are also required to prepare and maintain an incident register. The incident details that are to be recorded include:

- Name and organisation of person reporting the incident
- Date and Time of the Incident
- Incident location, including address
- Incident description/category (i.e. water pollution, odour, landside pollution etc.)
- Incident classification as per Section 3.5.1
- Details of the incident including contributing factors
- Whether the incident was reported to external authorities, (i.e. EPA as per Section 3.5.3) including date/time of notification
- What was the incident response, including clean-up/remedial actions, who attended etc
- Details of damage, short and long term
- If any follow up or corrective actions are required, who is responsible, what timeframe etc.
- If required, close out of follow up action.

3.6. Reporting and Auditing

3.6.1. Compliance Reporting and Auditing

The original Compliance Tracking Program which had separate components for Compliance Tracking Reports and Annual Environmental Audits was revised in 2015 and a new Compliance Tracking Program (available on the NSW Ports BLB2 project website) was approved by the Secretary of DPE in May 2015. The program specified independent environmental audits will instead be conducted every three years in conjunction with the three yearly hazard audits and that formal

compliance tracking reports are no longer required. Environmental audit reports are available for public inspection on request.

3.6.2. Records

All records required to be kept by this OEMP shall be kept for a minimum of five (5) years and shall be available for examination by a suitably qualified person authorised to inspect the OEMP.

A copy of the BLB2 project approval and all relevant environmental approvals are available at the BLB Office or on the NSW Ports' public website.

All documents required under the BLB2 project approval will be available for public inspection on request (subject to commercial confidentiality).

3.6.3. Document Currency

The OEMP is a controlled document in the NSW Ports electronic document filing system, The Hold. There is now only one BLB OEMP Word document in The Hold. Each time the Document is updated a new version is created over the old version, which is retained underneath the latest version. Once a new version is approved it is saved as a PDF controlled version and updated in The Hold.

The current version of the OEMP will be available on the NSW Ports' public website and tenants portal on the website.

Hard copies of the OEMP are not controlled documents and new version will not be distributed to staff, contractors and tenants when as a matter of course. However, a hard version may be provided on request to interested stakeholders, as required by the BLB2 project approval.

3.6.4. Action Tracking Register / Compliance Tracking

NSW Ports maintains a register of compliance with the project approval. Non-conformances / corrective actions as a result of events, incidents, audits or inspections will be documented and issued through NSW Ports Protecht Action Register.

3.7. OEMP Review

The OEMP shall be reviewed every three years, or when operations change that warrants an update of the OEMP.

The review will be undertaken by NSW Ports' staff and will consider as a minimum:

- NSW Ports' staff input
- Any agency input or response from DPE
- Maintenance / operational activity details
- Environmental monitoring outcomes
- Incidences and non-conformances
- Changes in organisational structure and responsibilities
- Changes in standards and legislation
- All relevant sub-plans

Once the OEMP has been reviewed approved, and each new version will be updated on the NSW Ports public website and tenant portal on the website.

Appendix A – Conditions of Consent (BLB2)

Appendix B – NSW Ports HSE Policy

Health, Safety and Environment (HSE) Policy

At NSW Ports we manage ports and intermodal assets that are key trade gateways connecting the people and businesses of NSW to global and domestic markets. We place a high priority on Health, Safety and Environmental (HSE) management to effectively mitigate risk while pursuing sustainable growth for our business.

We are committed to providing safe and healthy work conditions for employees, contractors, visitors and other persons at our workplaces and controlled premises, involved in activities of our undertaking. Together, we strive to prevent work-related physical and psychological injury and ill health.

We are also committed to protecting the environment by preventing pollution, responding to climate change, conserving local ecological and heritage values and using resources efficiently and sustainably. NSW Ports has developed a Sustainability Policy that should be read in conjunction with this policy.

Our Approach:

Our integrated management system provides a framework to achieve HSE objectives in accordance with our corporate values of care, collaboration, passion, integrity and accountability.

HSE management is a shared responsibility for everyone who works for NSW Ports or visits an NSW Ports workplace. We encourage visible leadership, engaging consultation and active participation of relevant stakeholders in HSE processes. Workers are required to take reasonable care for their own health and safety and the health and safety of others, including complying with any reasonable instruction given by NSW Ports and cooperating with any reasonable policy or procedure.

We implement our HSE Commitments by:

- Setting, monitoring and reviewing measurable HSE objectives and targets.
- Complying with relevant HSE legislation, approvals, licences, regulations, recognised standards and industry practice.
- Implementing an integrated risk management framework to mitigate the risk of hazards via a formal process of hazard identification, risk assessment, and elimination or control.
- Investigating incidents that cause or threaten significant harm to people or the environment and ensuring appropriate actions are taken in a timely manner to prevent a reoccurrence.
- Reporting HSE hazards, near misses, incidents and impacts, and corrective actions to senior management and the Board.
- Establishing HSE responsibilities and accountabilities according to the role, for our staff and other stakeholders such as contractors, visitors, tenants and other persons conducting business or undertakings at our sites.
- Consulting, collaborating and communicating HSE responsibilities, expectations, policies, management plans and processes to our staff and other stakeholders, including tenants and port users, regulators and the community.
- Providing appropriate training and support to ensure the competence of staff and others in fulfilling their HSE responsibilities.
- Providing and maintaining adequate premises, facilities, amenities, working conditions and resources to effectively meet our HSE objectives and procedures whilst conducting business.

We regularly review and update our HSE management system to continually improve our safety and environmental management and performance.

NSW Ports CEO – Marika Calfas

8 January 2025
Date

Health, Safety and Environment (HSE) Policy | November 2024 | Version 3.0

Appendix C – Risk Assessment Matrix

1) Consequence Rating						
Rating	Description	Financial	Environmental	Safety	Reputational	Operational
1	Minor	<$0.1M	Marginal environmental damage/onsite release contained immediately and not requiring notification of EPA.	Minor injury requiring simple first aid treatment.	Isolated complaint by an individual. No media attention.	Interruption of a critical function or process of less than 24 hours, or less than 48 hours for a non-core function or process
2	Moderate	<$0.2M	Environmental damage requiring notification to EPA.	Medical attention and absence from work for less than 5 days.	Complaint by multiple individual's. Low profile media attention.	Interruption of a critical function or process of between 24 and 48 hours, or between 2 and 7 days for a non-core function or process
3	Major	<1.0M	Environmental damage leading to an EPA investigation.	Injury requiring hospitalisation with absence from work for over 5 days, but no lasting health impact.	Level of public attention diverting significant management resources towards dealing with underlying matter. Delay to or suspension of strategic projects and revision of strategic goals.	Interruption of a critical function or process of between 2 and 7 days, or between 7 and 14 days for a non-core function or process
4	Critical	<$5M	Environmental damage leading to an EPA enforceable undertaking.	Single serious long term injury or disability.	Severe dent in key stakeholder confidence requiring extensive engagement of top management to restore trust and faith. Significant reduction in stakeholder support	Major or total disruption to operations of between one and four weeks
5	Extreme	>$5M	Extensive environmental damage leading to a parliamentary inquiry or commission.	Loss of life or multiple serious long term injuries or disabilities.	Loss of key stakeholder confidence affecting future growth and investment. Public outrage	Major or total disruption to operations of greater than four weeks

2) Likelihood rating			
Rating	Definition	Frequency	Description
1	Rare	Once every 25 years (0-10%)	Has not happened previously in our industry, but is a conceivable scenario / The risk will only occur in exceptional circumstances and is almost impossible
2	Unlikely	Once every 10 years (10-40%)	Has happened previously in our industry / The risk event may occur but only in certain circumstances and not likely to occur
3	Possible	Once every 5 years (40-70%)	Has been logged at least once within our organisation or my previous employer(s) / The risk event could occur at some point over the period of the objective
4	Likely	Once every 2 years (70-90%)	Has been logged at least several times within our organisation or my previous employer(s) / The risk event will probably occur at some point
5	Almost Certain	Once every year (90-100%)	Has been logged regularly in this area and others (known industry issue) / Risk event is almost certain to occur at some point

Risk Methodology: Risk Matrix

		Likelihood				
		Rare	Unlikely	Possible	Likely	Almost Certain
Consequence		1	2	3	4	5
Extreme	5	Significant (5-1)	High (5-2)	High (5-3)	High (5-4)	High (5-5)
Critical	4	Significant (4-1)	Significant (4-2)	High (4-3)	High (4-4)	High (4-5)
Major	3	Moderate (3-1)	Moderate (3-2)	Significant (3-3)	Significant (3-4)	High (3-5)
Moderate	2	Low (2-1)	Low (2-2)	Moderate (2-3)	Significant (2-4)	Significant (2-5)
Minor	1	Low (1-1)	Low (1-2)	Low (1-3)	Moderate (1-4)	Significant (1-5)

Appendix D – Emergency Contact List

AGENCY	PHONE NUMBER
Emergency	000
NSW Ports – Office Hours	1300 922 524
After hours Emergencies – Port Operations Manager / NSW Ports – BLB Officers	0400 656 562 (02) 9316 1137
PANSW VTS	(02) 9296 4003 (Marine Pollution Incidents)
Police	
Emergency	000
Police Non-emergency – Maroubra PAC	(02) 9349 9299
Ambulance	
Emergency	000
Non-emergency – Metro Division	1800 269 133
NSW Fire and Rescue	
Emergency	000
Non-emergency – Matraville Fire Station	(02) 9493 1056
Environment Protection Authority (EPA)	131 555 (24 hours)
NSW Health	(02) 9382 8333
Randwick Office Public Health Unit	(02) 9382 2222 (after hours)
Randwick City Council	1300 722 542
SafeWork NSW	13 10 50
Sydney Water	13 20 90 (24 hours)
Ausgrid (loss of supply, fallen wires or other electrical emergencies)	13 13 88 (24 hours)
Jemena Gas emergencies	13 19 09
Department of Planning, and Environment	1300 305 695

Appendix E – BLB Biosecurity Incident Response Procedure