

# OPERATIONAL AIR QUALITY MANAGEMENT PLAN – ADDENDUM

Moorebank Intermodal Precinct –  
Precinct West South

23 OCTOBER 2024

# Moorebank Intermodal Precinct – Precinct West South

EPBC 2011/6086 Approval, SSD 5066 Development Consent, SSD 7709 Development Consent and Complying Development Consent 230736/01

Operational Air Quality Management Plan – Addendum

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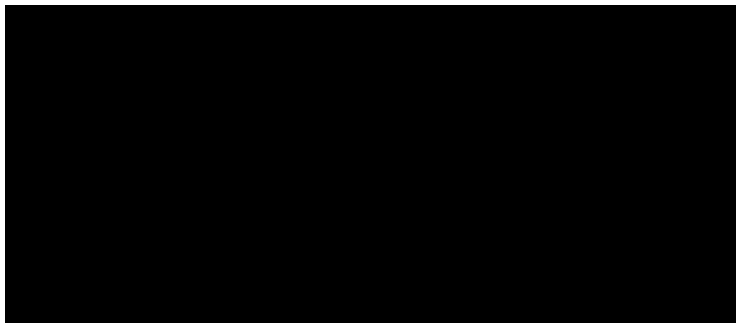
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## Revisions

| Revision | Date       | Description                        | Prepared by | Approved by |
|----------|------------|------------------------------------|-------------|-------------|
| 01       | 14/06/2024 | Draft for client review            | ██████████  | ██████████  |
| 02       | 25/06/2024 | Updated post sub-consultant review | ██████████  | ██████████  |
| 03       | 23/10/2024 | Final for issue                    | ██████████  | ██████████  |

## DECLARATIONS OF ACCURACY

### LOGOS MLP Development Management PTY LTD (as joint approval holder)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

Full name

Organisation LOGOS MLP Development Management Pty Ltd (ACN: 649 469 778)

Date

2 December 2024

**Qube Re Services (No. 2) (as joint approval holder)**

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

Full name

Organisation

Qube Re Services (No. 2) Pty Limited (ACN: 605 751 782)

Date

26/11/24

## ACRONYMS AND DEFINITIONS

| Acronym/Term                    | Meaning  |
|---------------------------------|--|
| Addendum                        | Operational Air Quality Management Plan – Addendum   |
| CoA                             | Conditions of Approval as detailed in the EPBC Act Approval EPBC 2011/6086   |
| CoC                             | Conditions of Consent as detailed in the EP&A Act Development Consent SSD 5066   |
| DCCEEW                          | Department of Climate Change, Energy, Environment and Water (formerly DotEE)   |
| The Development                 | The five warehouses and associated landscaping and infrastructure on the MPW South Site.   |
| Development site                | All operational areas of the MPW South Development   |
| DPE                             | Department of Planning and Environment (formerly the Department of Planning, Industry and Environment)   |
| EMS                             | Environmental Management Systems   |
| EP&A Act                        | Environmental Planning and Assessment Act 1979   |
| EPA                             | Environment Protection Authority   |
| EPBC Act 2011/6086 Approval     | Commonwealth Approval (No. 2011/6086) granted in September 2016 under the Environment Protection and Biodiversity Conservation Act 1999, for the impact of the MPW Development on listed threatened species and communities (sections 18 and 18A of the EPBC Act) and Commonwealth action (sections 28 of the EPBC Act). |
| EPBC Act                        | Environment Protection and Biodiversity Conservation Act 1999  |
| ESR                             | ESR Australia & New Zealand  |
| IMT                             | Intermodal freight terminal  |
| MIP                             | Moorebank Intermodal Precinct  |
| MPE                             | Moorebank Precinct East  |
| MPW                             | Moorebank Precinct West  |
| MPW Concept Development Consent | MPW Concept Development Consent (SSD 5066), granted by (the now) DPHI on 29 September 2014 for the development of an intermodal terminal facility including a rail link connecting the site to the Southern Sydney Freight Line, an intermodal terminal, warehousing and distribution facilities and a freight village.  |
| NCR                             | Non-compliance report  |
| Non-compliance                  | An occurrence, set of circumstances, or development that results in a non-compliance or is non-compliant with Development Consent SSD 7709 and SSD 10431 Conditions of Consent or EPBC Act Approval (EPBC 2011/6086) Conditions of Approval but is not an incident.  |
| OEMP                            | Operational Environmental Management Plan  |
| PPE                             | Personal Protective Equipment  |
| REMM                            | Revised Environmental Management Measures. These are the management and mitigation measures presented in the MPW Concept Plan Supplementary RtS (August 2017).   |
| RtS                             | Response to Submissions  |
| SSD                             | State significant development  |

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# 1 INTRODUCTION

## 1.1 Development Ownership

In 2022, LOGOS joined the ESR group of companies and since August 2024, the LOGOS and ESR operations have been integrated to now operate under the name ESR Australia & NZ (ESR). The applicant/ approval holder entity remains unchanged at this stage until further notice and references to LOGOS and LOGOS authored documents and/or plans may continue and remains relevant where LOGOS and ESR are used interchangeably.

## 1.2 Moorebank Intermodal Precinct Overview

The Moorebank Intermodal Precinct (MIP), operated by ESR (formerly LOGOS), is an integral component of the freight, ports and transport strategies of both the Commonwealth and NSW governments and is located approximately 27km south-west of the Sydney Central Business District and 26km west of Port Botany within the Liverpool Local Government Area.

The MIP aims to streamline the freight logistics supply chain from port to store, deliver savings to businesses and consumers, and help service the rapidly growing demand for imported goods in south-west Sydney. On completion, MIP will move 1.55 million shipping containers annually by rail instead of road. It will also feature Australia's largest purpose-built warehouse and distribution precinct serviced by the latest automated technology which will see driverless shuttle carriers collect and transport containers around the precinct to be processed, unpacked and stored on site prior to distribution.

The MIP is divided into the Moorebank Precinct West (MPW) and Moorebank Precinct East (MPE) developments.

MPW Stage 2 is located to the north of MPW South (the Development) and includes operation of a multi-purpose Intermodal (freight) Terminal facility, rail link connection, warehousing and a freight village. The MPW Stage 2 Operational Environmental Management Plan (OEMP) and sub-plans were approved by:

- the Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW) in accordance with Condition of Approval (CoA) 4 of the EPBC 2011/6086 Approval
- the NSW Department of Planning, Industry and Environment (DPIE) in accordance with Condition of Consent (CoC) C7 of the MPW Stage 2 (SSD 7709) Development Consent.

Operations on MPW Stage 2 commenced after these plans were approved.

## 1.3 Addendum Purpose

This Operational Air Quality Management Plan (OAQMP) – Addendum (this Addendum) has been prepared to apply environmental management measures, where relevant, consistently for the operation of the Development and meet the relevant conditions of the applicable development approvals and consents. This Addendum is an addendum to the MPW Stage 2 Precinct Operation Air Quality Management Plan (POAQMP) and forms a sub-plan to the MPW South OEMP – Addendum that has been prepared for the operation of the Development.

This Addendum addresses:

- the relevant conditions of the EPBC 2011/6086 Approval issued under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- the relevant conditions of the MPW – Concept and Stage 1 (State Significant Development (SSD) 5066) Development Consent
- the relevant conditions of the MPW Stage 2 (SSD 7709) Development Consent
- the relevant conditions of the Complying Development Consent (CDC) 230736/01 issued under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TISEPP).

This Addendum has been prepared for submission to DCCEEW under CoA 21 of the EPBC 2011/6086 Approval.

This Addendum aims to demonstrate how air quality impacts will be managed during the operation of the Development. It provides methods to monitor, measure, reduce and mitigate impacts on air quality by ESR and the warehouse tenants during the operation of the Development, including all Development personnel.

This Addendum was developed in reference to the following documents:

- Moorebank Intermodal Terminal Project Environmental Impact Statement (Parsons Brinkerhoff, October 2014), Chapter 17 Local Air Quality, Chapter 18 Regional Air Quality and Chapter 19 Greenhouse Gas Assessment
- Moorebank Intermodal Terminal Response to Submissions Report (Parsons Brinkerhoff, May 2015), Appendix G Local Air Quality Assessment
- Moorebank Intermodal Terminal Supplementary Response to Submissions Report (Parsons Brinkerhoff, August 2015), Chapter 4 Response to government agency submissions, Chapter 5 Response to community submissions and Chapter 7 Revised environmental management measures
- MPW Stage 2 OEMP
- MPW Stage 2 POAQMP
- MPW South OEMP – Addendum.

## 1.4 Objectives and Targets

The objectives and targets for this Addendum are the same as those detailed in Table 1-1 of the MPW Stage 2 POAQMP

## 1.5 Consultation

The MPW Stage 2 POAQMP was prepared in consultation with stakeholders as detailed in Table 1-2 of the MPW Stage 2 POAQMP.

No stakeholder consultation was required for the preparation of this Addendum.

## 1.6 Progressive Implementation of this Addendum

This Addendum is applicable to the operation of the Development. Operation of the Development will not commence until this Addendum has been submitted to the Minister responsible for the EPBC Act (or delegate) under CoA 21 of the EPBC 2011/6086 Approval. The most recent version of this Addendum will be implemented to manage the potential impacts of the Development on air quality during operation.

Operational areas will come online progressively as warehouses are constructed, commissioned, and tenanted. As areas become operational, any adjacent construction areas will continue to be managed in accordance with the relevant approved Construction Environmental Management Plan and sub-plans, while operational areas will be managed in accordance with the MPW South OEMP – Addendum and sub-plan addenda.

Until the entire Development is operational, all construction areas will be appropriately identified and demarcated to enable effective management of the interface between any construction areas and operations.

### **1.6.1 Distribution and Availability**

A copy of the approved MPW South OEMP – Addendum and sub-plan addenda will be kept at the Development Office and will be made available to relevant regulatory officers, the Certifying Authority and operational staff upon request.

In accordance with CoA 27 of the EPBC 2011/6086 Approval, each management plan will be published on the website of the person taking the action within one month of being approved or being submitted under CoA 21. This Addendum will be published on the Development's website (<https://moorebankintermodalprecinct.com.au/>).

### **1.6.2 Submission, Review and Update**

This Addendum will be submitted to DCCEEW as required by CoA 21 of the EPBC 2011/6086 Approval prior to the commencement of operation of the Development.

This Addendum will be reviewed annually, as a minimum (until all areas are operational), which may lead to revision of the document.

Under CoA 21 of the EPBC 2011/6086 Approval, the revised document can be submitted to DCCEEW for information if implementing the plan would not be likely to have a new or increased impact, and approval of the plan under Section 143A of the EPBC Act is not required. CoA 21 to 25 of the EPBC 2011/6086 Approval detail the process for review and implementation of the revised documents following submission to DCCEEW. In the event that ESR or DCCEEW considers that the implementation of the revised document would be likely to have a new or increased impact, approval of the revised documents under Section 143A of the EPBC Act will be required prior to implementation.

In addition to the triggers above, this Addendum may be revised more regularly as a result of:

- Inspection outcomes (either by internal or external parties)
- Changes to the precinct-wide environmental management requirements (see Section 4.1)
- Changes to procedures and/or scope of works after an incident or potential incident
- Design or operational changes
- Opportunities for improvement identified as part of an investigation or non-compliance report
- Internal or external environmental audits
- Material complaints.

## 1.7 Document Structure

The structure of this Addendum is:

- **Section 1** provides a brief overview of the MIP and the purpose, objectives and targets, and application of this Addendum. It also describes requirements for consultation (if any).
- **Section 2** provides a summary of the activities being undertaken during operation of the Development.
- **Section 3** outlines the statutory requirements and obligations which need to be fulfilled during operation of the Development in relation to the management of air quality.
- **Section 4** describes the environmental management requirements for the Development, relevant to air quality.
- **Section 5** describes the existing environment, identifies the aspect, impacts and risks for air quality and details the management measures that will be implemented to manage these risks.
- **Section 6** provides details for monitoring and review of the implementation of this Addendum, and how environmental non-compliance and non-conformance will be managed during operations.

This addendum has been structured to be consistent with the other MPW South sub-plan addenda, as appropriate.

## 2 DEVELOPMENT DESCRIPTION

The Development comprises Warehouses S1, S2, S3, S5 and S6, located within the southern portion of the MPW footprint. The operation of the Development also includes ancillary infrastructure, namely car parking, landscaping, signage and lighting. Bushmaster Avenue provides truck and car access to the Development site.

The warehouses have been approved to operate 24 hours per day, 365 days per year. Heavy and light vehicles would access the warehouses via the main site access off Moorebank Avenue and Bushmaster Avenue, light vehicles would park in the allocated parking area adjacent to each warehouse and heavy vehicles would progress to the truck loading/unloading areas alongside each warehouse. Containers would be transferred directly to the warehouses from the rail terminals located to the east of the Development site.

The future tenant(s) for the warehouses are currently unknown, and so further details on future warehouse operations, for example chemical, fuels and/or dangerous goods handling and storage, are currently not available.

The Development site is shown in Figure 2-1. Figure 2-2 shows an aerial view of the MPW South warehouses.

Figure 2-1 MPW South Development site (MP01-23103-P7, Watson Young, September 2023)

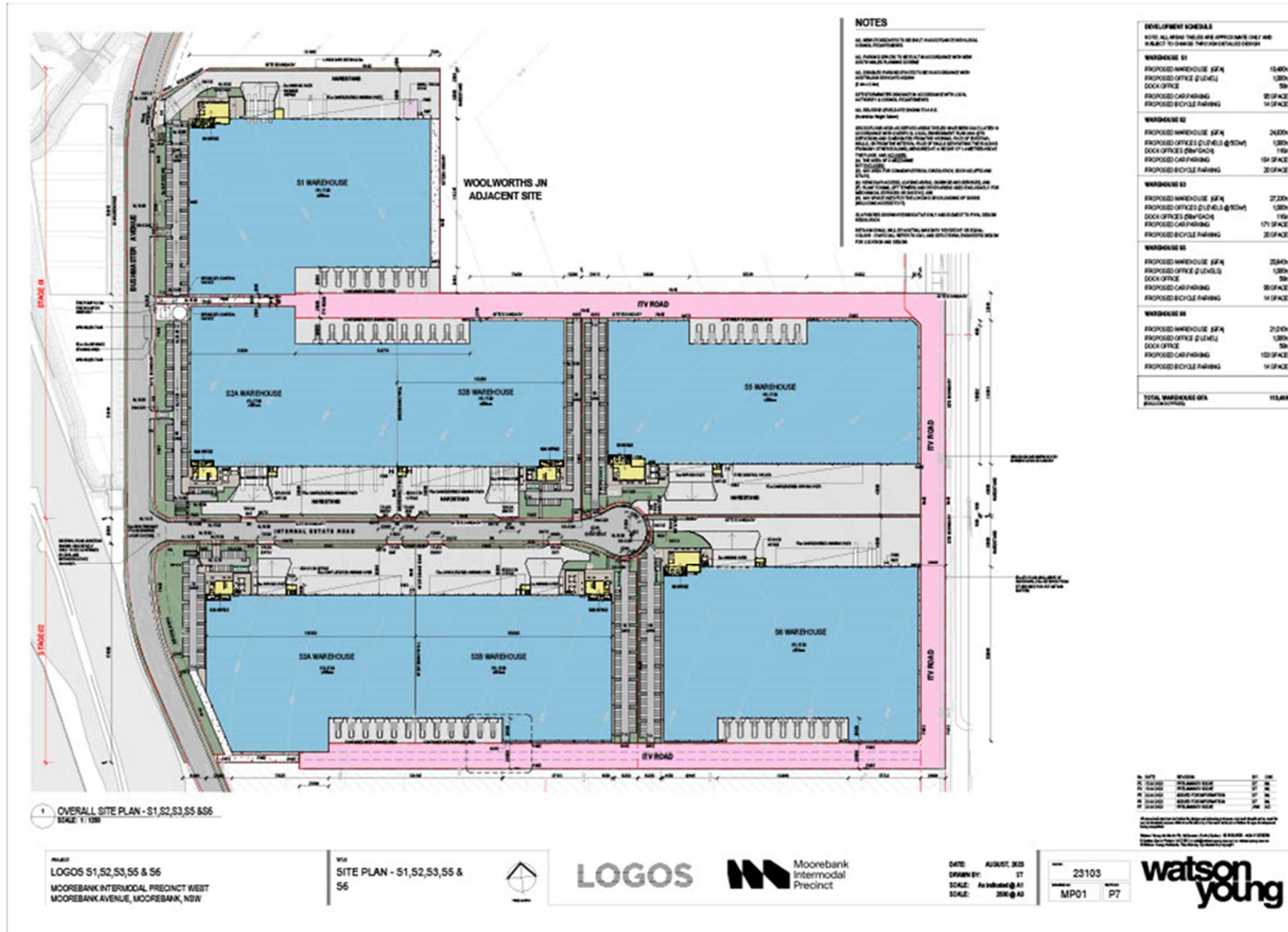


Figure 2-2 Aerial view of Warehouses S1, S2, S3, S5 and S6 (LOGOS 2023)





### 3 STATUTORY REQUIREMENTS

The operation of the Development is required to comply with all relevant development approvals and consents legislation, permits, and licences applicable to the Development site. Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of these are available, the most recent versions would be reviewed and their applicability to this Addendum determined.

#### 3.1 Development Approvals

The Development was approved under both the EPBC Act and Environment Planning and Assessment Act 1979 (EP&A Act). The approval, consent and certificate granted under these acts include conditions relevant to operations and potential air quality impacts as detailed below. Where updated or revised versions of guidelines, protocols, standards or policies, or a replacement of these are available, the most recent versions would be reviewed and their applicability to the Addendum determined.

The EPBC 2011/6086 Approval for the MPW Concept was granted by DotEE (now DCCEEW) in September 2016 and varied on 17 September 2019 and 22 April 2022. The operation of the Development will be consistent with the EPBC 2011/6086 Approval conditions. The EPBC 2011/6086 Approval refers to the Revised Environmental Management Measures (REMM) of the “finalised EIS” (i.e. the Moorebank Intermodal Terminal Plan Supplementary Response to Submissions (RtS), Parsons Brinckerhoff, August 2017).

The MPW Concept and Stage 1 (SSD 5066) Development Consent was granted on 3 June 2016. The CoC under Schedule 2 (Terms of Approval) are potentially relevant to the operations of the Development, although CoC under Schedule 3 (Stage 1 Early Works) and Schedule 4 (Future Development Applications) are not.

The MPW Stage 2 (SSD 7709) Consolidated Consent was approved on 11 November 2019 by the NSW Independent Planning Commission (IPC) and is predominately applicable to operations within the northern portion of the MPW Stage 2 Site. However, the SSD 7709 Consolidated Consent defines the MPW Stage 2 Site as including the area of the Development (Appendix 1 Figure 1 of SSD 7709). Therefore, SSD 7709 CoC that refer to the “site” may apply to operation of the Development.

CDC 230736/01 was issued for the Development under the TISEPP on 27 February 2024. The CDC included conditions relevant to the operation of the Development but not specifically related to air quality management and this Addendum.

The compliance of this Addendum with the relevant conditions of the approval and consents is detailed in Appendix A.

#### 3.2 Legislation

The regulatory framework relevant to the operation of the Development is documented in Appendix F of the MPW Stage 2 OEMP. This framework identifies relevant legislative instruments, their key objectives and their application to the Development.

This register will be revised and updated in conjunction with the management review outlined in Section 6 of the MPW South OEMP – Addendum or when there has been a change to relevant legislation.

### 3.3 Permits and Licences

Permits and licences relevant to operations are detailed in Appendix B of the MPW Stage 2 OEMP. This register is revised and updated in conjunction with the management review outlined in Section 6 of the MPW South OEMP – Addendum, or when there has been a change to relevant legislation.

Compliance conditions relating to items listed on this register are incorporated into the MPW South OEMP – Addendum and the sub-plan addenda, where relevant.

A summary of the key permits and licences applicable to operations of the Development is provided in Section 3.3 of the MPW South OEMP – Addendum.

### 3.4 Guidelines

This Addendum has been prepared in accordance with a list of guidelines and codes of practice as detailed in Appendix C of the MPW Stage 2 OEMP, including the *Environmental Management Plan Guidelines (Commonwealth of Australia, 2014)* and the *Environmental Management Plan Guideline – Guideline for Infrastructure Projects (DPE, 2020)*.

Additional legislation, standards and guidelines relating to the management of air quality include:

- Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (“Approved Methods”) (NSW Environment Protection Authority (EPA), 2016)
- Australian/New Zealand Standard (AS/NZS) 3580.1.1:2016 – Methods for sampling and analysis of ambient air – Part 1.1: Guide to siting air monitoring equipment
- AS/NZS 3580.10.1:2016 – Methods for Sampling and Analysis of Ambient Air, Method 10.1 Determination of Particulate Matter – Deposited Matter – Gravimetric Method
- EU Stage IIIA and IV emission standard (EU Directive 2014/26/EC) (Parliament of the European Union, 2014)
- Infrastructure Sustainability Council (ISC) for operation specific requirements
- National Environment Protection (Ambient Air Quality) Measure (NEPM AAQ) (Australian Government, 2003)
- US Tier US EPA Tier 3 and 4 emissions standards (US EPA, 2014).

## 4 ENVIRONMENTAL MANAGEMENT

### 4.1 Precinct-wide Environmental Management

Section 4 of the MPW South OEMP – Addendum describes ESR’s precinct-wide environmental management requirements as summarised in Table 4-1. This Addendum will be implemented in a manner that is consistent with these requirements.

Table 4-1 Precinct-wide environmental management requirements

| Environmental Management Requirements                               | Section of MPW South OEMP – Addendum |
|---|--------------------------------------|
| LOGOS’ Environmental Management System                              | Section 4.1                          |
| MIP Sustainability Policy and Sustainability Framework              | Section 4.2                          |
| LOGOS’ Workplace Health and Safety Management System                | Section 4.3                          |
| MPW Stage 3 Precinct OEMP   | Section 4.4                          |
| Operational environmental and sustainability objectives and targets | Section 4.5                          |
| Roles and environmental responsibilities                            | Section 4.6                          |
| Training and competence   | Section 4.7                          |
| Community consultation and complaints management                    | Section 4.8                          |
| Incident management and emergency response                          | Section 4.9                          |
| Document control and records  | Section 4.10                         |

### 4.2 Roles and Environmental Responsibilities

Key roles and responsibilities associated with the implementation of this Addendum are detailed in Table 2-10 of the MPW Stage 2 POAMP.

### 4.3 Training and Competence

Appropriate training and inductions for operations personnel will be undertaken in accordance with Section 4.7 of the MPW South OEMP – Addendum. The following air quality specific information will be included within the induction:

- Vehicle maintenance expectation
- Anti Idling policy vehicles, plant and equipment
- Fuel efficiency
- Dust generation (specific to landscape management)
- Reporting vehicles (smoky exhausts), plant and equipment maintenance concerns (noxious odours).

Training and/or toolbox talks will also be undertaken on air quality.

Records of all training and inductions are to be filed in accordance with the document control system outlined in the MPW South OEMP – Addendum.

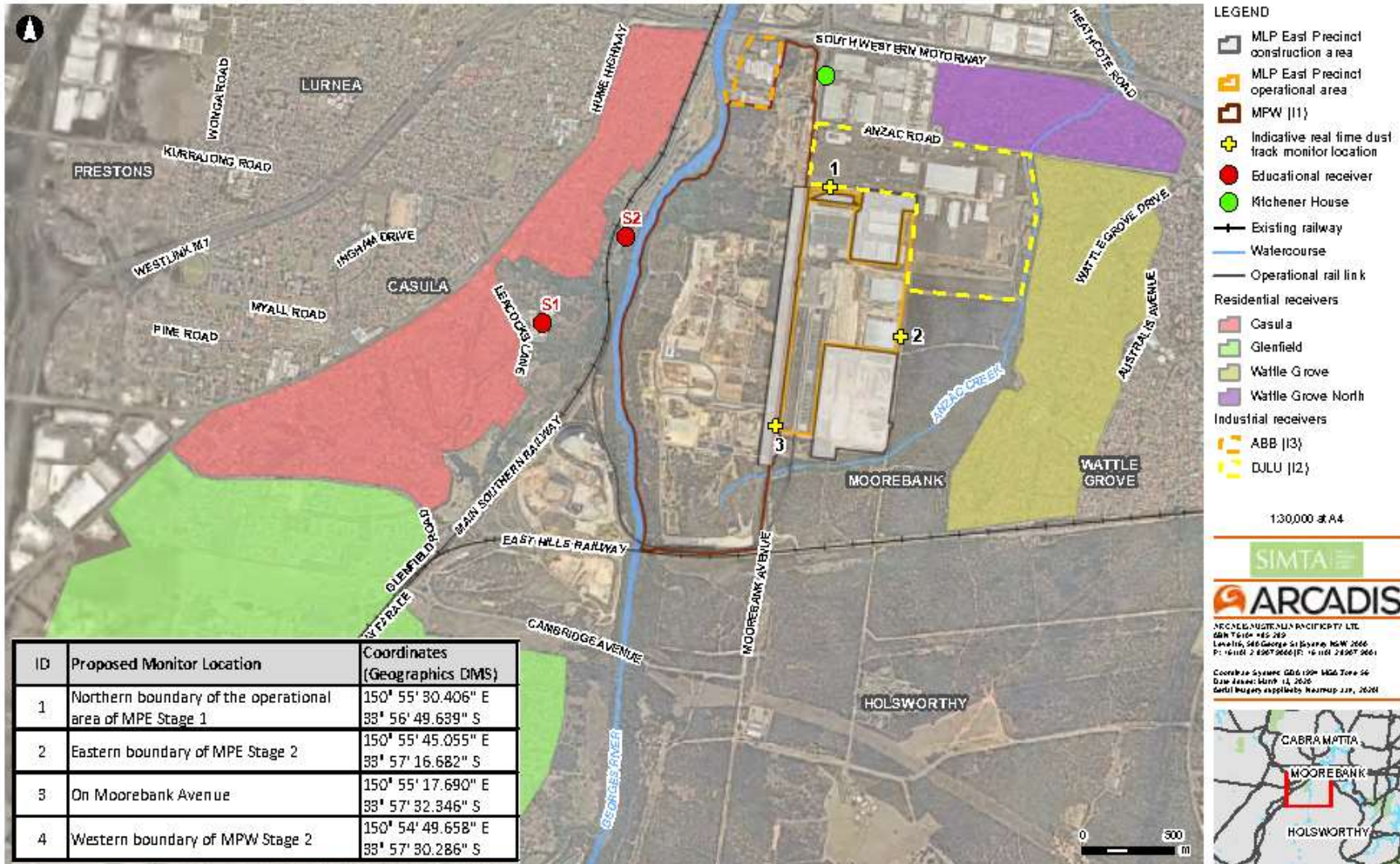
## 5 IMPLEMENTATION

### 5.1 Existing Environment

Section 3.1 of the MPW South POAQMP describes the existing environment in terms of:

- Meteorological conditions:
  - Prevailing wind conditions – Figure 3-1 shows seasonal wind roses
  - Ambient temperature – Monthly minimum range 5°C to 18°C (between May and September), with monthly mean maximum temperatures of 17°C to 28°C (summer months)
  - Rainfall – Mean annual rainfall of 870mm falling over an average of 115 days
- Existing ambient air quality data and adopted background air quality concentrations for MPW are detailed in Section 3.1.2 and Table 3-3, respectfully
- Sensitive receivers – Located in the neighbouring suburbs of Wattle Grove, Moorebank, Casula and Glenfield and are shown in Figure 5-1.

Figure 5-1 Sensitive receivers and proposed real-time air quality monitors



## **5.2 Aspects, Impacts and Risks**

Section 2 of this Addendum describes the Development, including operational activities, hours of operation and ancillary operational activities. Section 3.2 of the MPW Stage 2 POAQMP details the air quality aspects, impacts and risks associated with the operation of the Development.

## **5.3 Management Measures**

Management actions prescribed by this Addendum aim to avoid and minimise impacts on air quality. Management measures to be implemented during operations are detailed in Table 5-1. These measures have been sourced from the MPW Stage 2 POAQMP and subsequently amended to be relevant for the operation of the Development.

Table 5-1 Management Measures

| ID   | Management Measure   | Timing                              | Responsibility                          | Reference |
|--|--|-------------------------------------|---|-----------|
| <b>General</b> – Measures for minimising exhaust fumes |  |                                     |   |           |
| AQ1  | An anti-idle policy will be developed, and training will be provided to truck operators to maximise fuel efficiency and minimise unnecessary idling.                     | During operations                   | HSE Manager                             | REMM 10W  |
| AQ2  | Signs will be installed within the IMT to remind drivers of the anti-idle policy and their obligations.  | Prior to commencement of operations | Facilities Manager<br>Warehouse Tenants | REMM 10W  |
| AQ3  | A complaints line will be available for the community to report excessive idling and smoky vehicles associated with the facility.  | Prior to commencement of operations | Communications Manager                  | REMM 10Z  |
| AQ4  | Energy-efficient guidelines for operational work, such as minimal idling time for machinery or complete shut off, would be considered and implemented where appropriate. | Prior to commencement of operations | Facilities Manager<br>Warehouse Tenants | REMM 11D  |



| ID   | Management Measure   | Timing                                  | Responsibility                          | Reference                                 |
|--|--|---|---|---|
| <b>Diesel Exhaust</b> – Measures for minimising emissions of VOC, SO <sub>2</sub> , PAHs, particulate matter, NO <sub>2</sub> and CO |  |   |   |   |
| AQ4  | <p>Fuel efficiency of the operation plant/equipment will be assessed prior to selection, and where practical, equipment with the highest fuel efficiency and which uses lower GHG intensive fuel (e.g. biodiesel) will be used during operation.</p> <p>For example, some equipment may not be compatible with using lower GHG intensive fuel (LPG, biodiesel or biodiesel blends). Furthermore, the use of lower GHG intensive fuel may not be practical if the GHG benefit is offset by an increase in emissions of air pollutants (such as NO<sub>x</sub> or PM<sub>2.5</sub>).</p> | Prior to the commencement of operations | Facilities Manager<br>Warehouse Tenants | REMM 10AA and 11C                         |
| AQ6  | All registered vehicles visiting and operated within the Facility will be regulated under the Australian Design Rules and the Fuel Quality Standards Act (2000).   | During operations                       | HSE Manager<br>Warehouse Tenants        | REMM 10AA                                 |
| AQ 7   | All vehicles and equipment will be maintained and operated in accordance with the manufacturer's specifications.   | During operations                       | HSE Manager<br>Warehouse Tenants        | REMM 10Z and 10AA<br>SSD 7709<br>CoC B188 |
| AQ8  | Equipment with smoky exhausts (visible black smoke emitted for a continuous period of more than 10 seconds) shall be stood down for maintenance.   | During operations                       | HSE Manager<br>Warehouse Tenants        | REMM 10Z<br>10AA                          |
| AQ9  | Trucks with smoky exhausts (visible black smoke emitted for a continuous period of more than 10 seconds) shall be excluded from the Facility.  | During operations                       | HSE Manager<br>Warehouse Tenants        | REMM 10Z and 10AA                         |
| AQ10   | Unnecessary idling for vehicles will be avoided with engines turned off during periods of inactivity.  | During operations                       | Warehouse Tenants                       | REMM 10W, 11D and                         |

| ID  | Management Measure   | Timing                     | Responsibility                   | Reference                                |
|---|--|----------------------------|----------------------------------|--|
|   |  |                            |                                  | 10AA                                     |
| AQ11  | Trips and trip distances will be controlled and reduced for example by the efficient management of deliveries and dispatches.  | During operations          | Warehouse Tenants                | REMM 10Y<br>SSD 7709<br>CoC B188         |
| AQ12  | Loading and unloading will be coordinated to minimise truck trip distances as they travel through the Facility.  | During operations          | Warehouse Tenants                | REMM 10Y<br>SSD 7709<br>CoC B188         |
| AQ13  | A vehicle booking system, truck marshalling lanes and rejection of trucks that arrive early will be implemented to minimise wait times and queuing.  | Commencement of operations | Warehouse Tenants                | REMM 10W and 11D<br>SSD 7709<br>CoC B188 |
| <b>Dust</b> – Visible dust from landscaping and maintenance practices |  |                            |                                  |  |
| AQ14  | Working practices will be modified to prevent dust emissions when nuisance dust is seen leaving the Facility, in accordance with best practice management measures described in the CAQMP. | Visible dust pollution     | HSE Manager                      | REMM 10AH<br>SSD 7709<br>CoC B46         |
| <b>Odour Emissions</b> – Associated with refuelling                   |  |                            |                                  |  |
| AQ15  | Refuelling of equipment will be sited as far from sensitive receivers as practical and limited to low volatility fuels (i.e. diesel) to prevent odour impacts.                             | During operations          | HSE Manager<br>Warehouse Tenants | REMM 11B and 11C<br>SSD 7709<br>CoC B47  |

| ID                                 | Management Measure  | Timing                     | Responsibility    | Reference                          |
|------------------------------------|---|----------------------------|-------------------|------------------------------------|
| <b>Reducing use of diesel fuel</b> |   |                            |                   |                                    |
| AQ16                               | <p>Where feasible, electricity powered container handling equipment will be used instead of diesel equipment.</p> <p>Feasibility relates to technical and logistical considerations. For example, whether specific electric container handling equipment is compatible with the operational logistics for the MPE or whether electric technology options are available for specific types of equipment.</p> | Commencement of operations | Warehouse Tenants | REMM 10AD                          |
| AQ18                               | <p>Where feasible, tenants will be encouraged to use LNG powered forklifts instead of diesel vehicles.</p> <p>Feasibility relates to technical and logistical considerations. For example, whether LNG powered forklifts are compatible with the operational logistics for individual tenants.</p>  | Commencement of operations | Warehouse Tenants | EPBC 2011/6068 Approval Annexure A |
| AQ19                               | <p>Where feasible, warehouse heating and cooling equipment will be run using electricity generated from solar arrays installed on warehouse roofs.</p> <p>Feasibility relates to technical and logistical considerations. For example, depending on the overall power demand for individual tenants, and when this demand is highest (day/night), solar power may not be technically feasible.</p>          | During operations          | Warehouse Tenants | REMM 11H                           |

## 6 MONITORING AND REVIEW

### 6.1 Environmental Monitoring

Air Quality monitoring will be undertaken consistently with the monitoring detailed in Section 4.1 of the MPW Stage 2 POAQMP. Monitoring required to determine the effectiveness of management measures required by this Addendum are outlined in Table 6-1.

Key performance indicators for operational air quality management at the site will be zero community complaints, monitored through the community complaints line, and compliance for the ambient air monitoring outlined in Table 4-2 of the MPW Stage 2 POAQMP. Management of air quality community complaints is discussed further in Section 4.6 of the MPW Stage 2 POAQMP.

A detailed description of the operational air quality monitoring to be undertaken is outlined in Table 4-4 of the MPW Stage 2 POAQMP.

Table 6-1 Monitoring activities

| Monitoring Activity   | Frequency    | Responsibility    |
|---|--------------|-------------------|
| Visual Inspection <sup>(1)</sup> <ul style="list-style-type: none"> <li>• Excessive truck and locomotive idling</li> <li>• Generation of exhaust fumes (smoky exhausts for periods exceeding 10 seconds)</li> <li>• Nuisance dust visibly leaving site</li> <li>• Emission of offensive odours</li> </ul> | Daily        | All Site Personal |
| Air Quality Monitoring requirements relevant to this Addendum are summarised in Table 4 2 of the MPW Stage 2 POAQMP <sup>(2)</sup> . Locations of sensitive receivers and proposed monitoring sites are shown in <b>Error! Reference source not found..</b>   | At all times | HSE Manager       |

Notes:

(1) A summary of the reactive measures and corrective actions in response to non-compliance during visual inspections are summarised in Table 4-1 of the MPW Stage 2 POAQMP.

(2) Should exceedance of the monitoring criteria and trigger values for Ambient air monitoring requirements be recorded, an investigation will be undertaken to identify the likely source of the exceedances.

### 6.2 Environmental Reporting

Section 6.2 of the MPW South OEMP – Addendum details the environmental reporting required during the operation of the Development.

The reporting requirements that are applicable to this Addendum are summarised in Table 6-2.

Table 6-2 Environmental reporting requirements

| Requirement                      | Area       | Responsibility    | Frequency                            | Submitted to         |
|----------------------------------|------------|-------------------|--------------------------------------|----------------------|
| Air quality monitoring reporting | MIP        | ESR               | Annually (part of the Annual review) | DPHI<br>DCCEEW       |
| Air quality monitoring reporting | MIP        | ESR               | Internal monthly reporting           | HSE Manager          |
| Annual Review                    | MPW        | ESR               | Annually                             | DPHI<br>DCCEEW       |
| Compliance reporting             | MIP        | ESR               | Pre-operation                        | Compliance reporting |
| Compliance reporting             | Warehouses | Warehouse Tenants | Six-monthly                          | HSE Manager          |

### 6.3 Environmental Auditing and Inspections

Auditing and inspections will be undertaken in accordance with Sections 6.3 of the MPW South OEMP – Addendum

### 6.4 Incidents

All noise incidents are to be reported and managed in accordance with the Logos Incident Reporting and Management Procedure (SHEMS-QM-13-PR-0126). Incidents are classified based on the incident’s severity as shown in Section 4.9 of the MPW South OEMP – Addendum.

### 6.5 Complaints

All noise complaints will be handled in accordance with Section 4.8 of the MPW South OEMP – Addendum.

As outlined in Table 6-1, in the event of a confirmed noise complaint, noise monitoring may be carried out as part of an investigation to determine whether noise levels are achieving the requirements of the Development.

### 6.6 Non-compliance, Non-conformance and Corrective Actions

It is the responsibility of all personnel to report non-conformances to ESR. The HSE Manager and/or Asset Manager will investigate non-conformances, log corrective and/or preventative actions, and delegate responsibility for corrective and/or preventative actions within assigned timeframes.

Non-compliances and non-conformances will be managed in accordance with Section 6.4 of the MPW South OEMP – Addendum.

## **APPENDIX A – APPROVALS AND CONSENT COMPLIANCE MATRIX**

| CoA/CoC                        | Requirement   | Reference              | How Addressed  |
|--------------------------------|---|------------------------|--|
| <b>EPBC 2011/6086 Approval</b> |   |                        |  |
| 10                             | Sections of the CEMP and OEMP relating to air quality must be prepared by a suitably qualified expert and must:   | This Addendum          | This Addendum was prepared by suitably qualified experts from Aspect Environmental.  |
|                                | a) be consistent with the Air Quality Provisional Environmental Management Framework (2 July 2014), provided at Appendix O to the finalised EIS   | Sections 4 and 5       | This Addendum is consistent with Section 6.1.3 of the Air Quality Provisional Environmental Management Framework which details management controls to be implemented during the operation phase. |
|                                | b) incorporate all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'mandatory'                             | Sections 3.3 and 4.1.2 | REMM 10W, 10Y-10AA, 10AG, 10AH, 11A and 11E-11G apply to operations.<br><br>REMM 10V does not apply to operations.   |
|                                | c) explain how all measures 10A to 10U (CEMP only) and 10V to 10AH and 11A to 11H (OEMP only) from Table 7.1 of the finalised EIS that are described as 'subject to review' have been addressed | Section 5.3            | REMM 10AB-10AC, 11B-11D and 11H apply to operations.<br><br>REMM 10X and 10AD-10AF do not apply to operations.   |
|                                | d) be approved by the Minister or a relevant New South Wales regulator  | NA                     | This Addendum will be submitted to DCCEE under CoA 21.   |

| CoA/CoC     | Requirement  | Reference   | How Addressed  |
|-------------|--|-------------|--|
| <b>REMM</b> |  |             |  |
| 10W         | Manage Project site traffic to minimise the possibility of trucks queueing along public roads adjacent to the Project site. This can be achieved through the implementation and enforcement of an idling limit for trucks on site and provision for a troubled truck parking area.   | Section 5.3 | Management measures AQ1, AQ2, AQ5, AQ11 and AQ16 (in Table 5-1) address potential truck queueing.                                |
| 10Y         | Optimise the use of trucks capable of transporting multiple TEU containers simultaneously to achieve maximum efficiency onsite and reduce air emissions.   | Section 5.3 | Management measures AQ11 and AQ12 (in Table 5-1) address efficient management of deliveries and dispatches through the facility. |
| 10Z         | Vehicles would be maintained to not release excessive levels of smoke from the exhaust and to be compliant with OEH's Smokey Vehicles Program under the POEO Act and POEO Regulations.   | Section 5.3 | Management measures AQ6, AQ7, AQ8 and AQ9 (in Table 5-1) address smoky vehicles.   |
| 10AA        | Emissions from the operators' trucks would be regulated by the NEPM (Diesel Vehicle Emissions) (NEPC 2001).  | Section 5.3 | Management measures AQ5-AQ11 (in Table 5-1) address exhaust from diesel trucks.  |
| 10AH        | <p>It is also proposed that ambient air quality monitoring be undertaken as part of the Project's construction phase right through to operation. This would include:</p> <ul style="list-style-type: none"> <li>onsite monthly dust deposition monitoring during construction to measure dust fallout from the Project at boundary points and selected sensitive receiver locations. This would include comparison of concentrations with the air quality criteria; and</li> <li>annualised average monitoring after operations commence to ensure that the ambient air quality criteria are met.</li> </ul> | Section 6.1 | Table 6-1 details the ambient air quality monitoring required during operations.   |



| CoA/CoC | Requirement  | Reference   | How Addressed   |
|---------|--|---|---|
| 11B     | Where possible, implement the use of biofuels (e.g. biodiesel, ethanol, or blends such as E10 and B880) to reduce GHG emissions from plant and equipment.  | Section 5.3   | Management measure AQ5 (in Table 5-1) addresses the use of low GHG emission fuels.  |
| 11C     | Consider the use of vehicles with minimum GHG emissions ratings of 7.5 for passenger vehicles and 6 for light commercial vehicles, as described in the Green Vehicle Guide ( <a href="http://www.greenvehicleguide.gov.au/GVGPUBLICUI/home.aspx">http://www.greenvehicleguide.gov.au/GVGPUBLICUI/home.aspx</a> ).  | Section 5.3   | Management measure AQ5 (in Table 5-1) addresses the use of low GHG emission fuels   |
| 11D     | Energy-efficient guidelines for operational work, such as minimal idling time for machinery or complete shut off, would be considered and implemented where appropriate.   | Section 5.3   | Management measure AQ4 (in Table 5-1) addresses plant and equipment idling.   |
| 11E     | Establish an Environmental Management System (EMS) that involves regular monitoring, auditing and reporting on energy, resource use and GHG emissions from all relevant activities; include energy audits with a view to progressively improving energy efficiency and investigation of renewable energy sources (e.g. onsite solar generation), where feasible. | MPW South OEMP – Addendum Sections 4.1, 5.2.2 and 6.1<br><br>MPW Stage 2 OEMP Section 4.5 | Section 4.1 of the MPW South OEMP – Addendum outlines the LOGOS EMS.<br><br>Section 5.2.2 of the MPW South OEMP – Addendum lists environmental forms, including an energy consumption register.<br><br>Section 6.1 of the MPW South OEMP – Addendum (Table 6 1) includes requirement for monitoring of energy and GHG emissions.<br><br>Section 4.5 of the MPW Stage 2 OEMP (Table 4 1) includes energy use reporting and monitoring. |
| 11F     | Investigate methods to reduce losses from industrial processes (refrigerants and SF6).   | NA  | At this stage, warehouse tenants are unknown and the use of these materials at the Development has  |

| CoA/CoC   | Requirement  | Reference                           | How Addressed  |
|---|--|-------------------------------------|--|
|   |  |                                     | not been determined.   |
| 11G   | Investigate and, where possible, implement key performance indicators (KPIs) for plant efficiency and GHG intensity.   | MPW Stage 2 OEMP<br>Section 4.5     | Section 4.5 of the MPW Stage 2 OEMP (Table 4-1) includes targets for energy monitoring and renewable energy use.   |
| 11H   | Consider and implement, where possible, the mitigation options for further reducing energy and GHG emissions detailed in Table 9.4 in Section 9 – Project sustainability.  | NA                                  | <p>The initiatives listed have been considered for the Development and in many cases implemented. Examples relevant to operations include:</p> <ul style="list-style-type: none"> <li>• Water sensitive urban design principles incorporated into landscape design</li> <li>• Installation of PV panels on warehouse roofs</li> <li>• Establishment of conservation zone and revegetation of riparian zone.</li> </ul> |
| <b>MPW Concept and Stage 1 (SSD 5066) CoC requirements</b>    |  |                                     |  |
| The are no conditions that relate to operational air quality. |  |                                     |  |
| <b>MPW 2 (SSD 7709) site-wide CoC requirements</b>            |  |                                     |  |
| B47A  | Prior to the commencement of operation of the MPW development, the Applicant must prepare an Operational AQMP (AQMP) for the entire precinct (MPE + MPW) and submit for the approval of the Planning Secretary. The Applicant may submit a plan approved under an approval for the MPE site, | MPW Stage 2 POAQMP<br>This Addendum | This Addendum addresses these requirements for the operation of the Development, where relevant.   |

| CoA/CoC | Requirement  | Reference   | How Addressed   |
|---------|--|-------------|---|
|         | <p>provided it is amended to apply to and address air quality impacts of the MPW development. The AQMP must be prepared by a suitably qualified person(s) and must form part of the OEMP required by condition C5. The AQMP must demonstrate how the development would comply with the conditions of consent, and include:</p> <ul style="list-style-type: none"> <li>(a) identification of sources and quantify airborne pollutants;</li> <li>(b) best practice reactive and proactive control measures that will be implemented for each emission source;</li> <li>(c) provisions for the implementation of additional measures in response to issues identified during monitoring and reporting;</li> <li>(d) for all emission sources associated with site operations; <ul style="list-style-type: none"> <li>(i) key performance indicator(s);</li> <li>(ii) monitoring method(s);</li> <li>(iii) location, frequency and duration of monitoring;</li> <li>(iv) recording keeping;</li> <li>(v) complaints register;</li> <li>(vi) response procedures; and</li> <li>(vii) compliance monitoring.</li> </ul> </li> <li>(e) phased conversion to reach stackers of Tier 4 standard for particle emissions (or equivalent standard that is satisfactory to the Secretary) at the MPW Site within ten years of first operation of the Site.</li> </ul> |             |   |
| B188    | <p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> </ul>   | Section 5.3 | Management measure AQ7 (in Table 5-1) addresses plant and equipment maintenance and |

| CoA/CoC                                   | Requirement   | Reference | How Addressed |
|---|---|-----------|---------------|
|   | (b) operated in a proper and efficient manner.  |           | operation     |
| <b>CDC 230736/01 and TISEPP Chapter 6</b> |   |           |               |
|   | The CDC did not include conditions relevant to air quality during the operation of the Development. |           |               |