

# Project Caymus Compliance Assessment Plan

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## Authorisation

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# 1. Compliance Assessment Plan

## 1.1 Purpose

On 29 November 2021, Crowley Australia Pty. Ltd. (Crowley) received Ministerial approval to construct and operate a bulk fuel storage facility and ancillary infrastructure for the transfer and storage of jet fuel, East Arm, Darwin (the Project), under Section 65 of the *Environment Protection Act 2019* in line with Environmental approval EP2021/008-001 (the approval).

The NT EPA had assessed the project proposal by referral information under the EP Act. The completed assessment included a draft environmental approval. The Minister for Environment granted the environmental approval on 29 November 2021.

([https://depws.nt.gov.au/\\_\\_data/assets/pdf\\_file/0020/1073261/assessment-report-93-project-caymus.pdf](https://depws.nt.gov.au/__data/assets/pdf_file/0020/1073261/assessment-report-93-project-caymus.pdf) "Assessment Report 93")

Crowley submitted an "Application for a review of a decision" on 13 January 2023, in accordance with Section 106 of the *Environment Protection Act 2019* and received a response on from the CEO of Department of Environment, Parks and Water Security (DEPWS) as delegate for the minister on 16 May 2023. This compliance plan has been updated to reflect EP2021/008 – 002.

The Project is to construct and operate a U.S. Defence Bulk Fuel Storage Facility (BFSF) located on Lot 5720 west of the Railway Terminal on East Arm District, Northern Territory, near Darwin. The jet fuel storage facility will have storage capacity of 300 MegaLitre (ML) jet fuel comprising the capacities:

- 700,000 barrels (111.3 ML) of F34 jet fuel (military kerosene type) aviation turbine fuel with Fuel System Icing Inhibitor (FSII) used by land-based military gas turbine engine aircraft; and
- 1,200,000 barrels (190.8 ML) F44 combustible jet fuel (military high flash-point kerosene type) aviation turbine fuel with FSII used by ship borne military gas turbine engine aircraft.

This Compliance Assessment Plan (CAP) has been developed to address Condition 6 of the approval:

Condition 6a: The approval holder shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 6f, or prior to implementation of the action, whichever is sooner.

Condition 6b: The Compliance Assessment Plan shall indicate:

- i. the frequency of compliance reporting;
- ii. the approach and timing of compliance assessments;
- iii. the retention of compliance assessments;
- iv. the method of reporting of potential non-compliances and corrective actions taken;
- v. the table of contents of Compliance Assessment Reports; and
- vi. public availability of Compliance Assessment Reports.

This CAP has been prepared utilising a standard industry framework approach in line with similar jurisdictions including the WA Environmental Protection Authority's Post Assessment Guideline for Preparing a Compliance Assessment Plan, PAG No. 2 (OEPA, 2012a).

## 1.2 Frequency of Compliance Reporting

In accordance with Condition 6f of the approval, the first Compliance Assessment Report shall be submitted fifteen (15) months from the date of issue of the approval addressing the twelve (12) month period from the date of issue of this approval and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.

CARs will be submitted to the CEO of DEPWS in electronic form by emailing [environmentalregulation@nt.gov.au](mailto:environmentalregulation@nt.gov.au).

### **1.3 Approach and Timing of Compliance Assessments**

Compliance with the conditions of the approval shall be assessed in accordance with the approach and timing defined in the Audit Table template provided in Appendix A.

### **1.4 Retention of Compliance Assessments**

In accordance with Condition 6d of the approval, Crowley shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 6a and shall make those reports available when requested by the CEO of DEPWS.

### **1.5 Reporting Non-compliance and Corrective Measures**

In accordance with Condition 6e of the approval, Crowley shall advise the CEO of any potential or actual non-compliance within seven (7) days of that non-compliance being known. CEO notifications to be sent in electronic form by emailing [environmentalregulation@nt.gov.au](mailto:environmentalregulation@nt.gov.au).

Reportable incidents will be notified as per relevant regulatory requirements where an incident may have caused or threatens serious or material environmental harm.

### **1.6 Compliance Assessment Reports**

In accordance with Condition 6g of the approval the CAR shall:

- i. Table of contents including introduction/purposes, activities/project status, and monitoring data and data review (groundwater, surface water, and air monitoring)
- ii. have the company seal affixed and be endorsed by the approval holder's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;
- iii. include a statement as to whether the approval holder has complied with the conditions;
- iv. identify all potential non-compliances and describe corrective and preventative actions taken;
- v. be made publicly available in accordance with the approved Compliance Assessment Plan; and
- vi. indicate any proposed changes to the Compliance Assessment Plan required by condition 6a.

### **1.7 Public Availability of Reports**

In accordance with Condition 6b of the approval, Crowley will publish all CARs on the company's website (<https://www.crowley.com/darwin-australia/>) in accordance with the CAP, unless otherwise approved by the CEO.

### **1.8 Revision of Compliance Assessment Plans**

Crowley shall review and revise the CAP as required to reflect any changes made to the Project or the Environmental Approval where the change has an impact on any actions or requirements of the CAP.

### **1.9 Submission of Reports**

All reports and documents to the CEO of DEPWS will be submitted in electronic form by emailing [environmentalregulation@nt.gov.au](mailto:environmentalregulation@nt.gov.au).

## **1.10 References**

Project Caymus NT Environmental Approval, 2021 (EP2021/008 – 002)

## Appendix A. Compliance Audit Table Template

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
EP2021/008-002:1a	Time limit of proposal implementation	The proponent shall not commence implementation of the proposal after two (2) years from the date on which approval has been granted, unless substantial work has physically commenced on or before that date.	CAR	Photos demonstrating substantial commencement of Project.	Overall	By 29 November 2023		
EP2021/008-002:1b	Time limit of proposal implementation	The approval holder must notify in writing the Chief Executive Officer of the Department of Environment, Parks and Water Security (the CEO) of the date of commencement of the action, within 10 business days after the date of commencement of the action.	Written correspondence of commencement – CAR	Letter or email to the CEO notifying the date of commencement. Photos demonstrating substantial commencement of Project.	Overall	Within 10 business days after commencement of the action		
EP2021/008-002:2	Proposal Implementation	The action must be carried out: <ul style="list-style-type: none"> <li>a. In accordance with the Environment Protection Act 2019;</li> <li>b. In accordance with this approval;</li> <li>c. In a competent manner; and</li> <li>d. Wholly within the premises as identified in the approval</li> </ul>	Written correspondence.	Letter or email to the CEO notifying change.	Overall	For the life of the action		
EP2021/008-002:3	Contact details	The approval holder must notify the CEO of any change of its name, physical address, postal address and contact details for the serving of notices or other correspondence within 10 business days of such change.	Written correspondence	Letter or email to the CEO notifying change.	Overall	Within 10 business days of a change in name, physical address or postal address.		
EP2021/008-002:4	Operation and maintenance of plant and equipment	The approval holder must ensure any plant and equipment used in conducting the action: <ul style="list-style-type: none"> <li>a. Is fit for the purpose and use to which it is put;</li> <li>b. Is maintained;</li> <li>c. Is operated by a person trained to use the plant and equipment; and</li> <li>d. Is calibrated in accordance with Australian Standard methods.</li> </ul>	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	For the life of the action		
EP2021/008-002:5a	Environmental Management	Prior to commencement of operation, the approval holder must develop and implement an environmental management system (EMS) that applies specifically to the action, and is consistent with the Australian Standard AS/NZS ISO 14001 Environmental Management Systems	EMS	Evidence of a fit for purpose ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers.	Overall	By September 18, 2023		
EP2021/008-002:5b	Environmental Management	The approval holder must ensure that the action is designed, constructed, maintained and operated in accordance with industry best practice, and as a minimum: <ul style="list-style-type: none"> <li>i. all applicable Australian Standards, including but not limited to AS1940 and AS1692, as amended from time to time.</li> <li>ii. all applicable American Petroleum Industry (API) standards, including but not limited to API650 and API1581, as amended from time to time.</li> </ul>	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	For the life of the action		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
EP2021/008-002:6a	Compliance Reporting	The approval holder shall prepare and maintain a Compliance Assessment Plan which is submitted to the CEO at least six (6) months prior to the first Compliance Assessment Report required by condition 6f, or prior to implementation of the action, whichever is sooner.	Prepare CAP (this document) in accordance with approval and guideline requirements.	Approved CAP. DEPWS approval of CAP.	Overall	By 30 June 2023, or prior to implementation of the proposal, whichever is sooner.		
EP2021/008-002:6b	Compliance Reporting	The Compliance Assessment Plan shall indicate: <ul style="list-style-type: none"> <li>i. the frequency of compliance reporting;</li> <li>ii. the approach and timing of compliance assessments;</li> <li>iii. the retention of compliance assessments;</li> <li>iv. the method of reporting of potential non-compliances and corrective actions taken;</li> <li>v. the table of contents of Compliance Assessment Reports; and</li> <li>vi. public availability of Compliance Assessment Reports.</li> </ul>	Prepare CAP (this document) in accordance with approval and guideline requirements.	Approved CAP. DEPWS approval of CAP.	Overall	By 30 June 2023, or prior to implementation of the proposal, whichever is sooner.		
EP2021/008-002:6c	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 6b the approval holder shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 6a.	CAR prepared in accordance with approved CAP.	Submission of CAR to the CEO	Overall	18 September 2023 and annually thereafter		
EP2021/008-002:6d	Compliance Reporting	The approval holder shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 6a for a period of seven years from the finalisation of each report. The approval holder shall make those reports available when requested by the CEO.	All CARs shall be retained for a minimum of seven years following the end of the life of the proposal.	Provision on request of CEO	Overall	Retain CARs for 7 years following the end of life of the proposal. Make CARs available when requested by CEO.		
EP2021/008-002:6e	Compliance Reporting	The approval holder shall advise the CEO of any potential or actual non-compliance within seven (7) days of that non-compliance being known.	Written correspondence.	Letter to the CEO providing non-compliance reports and corrective actions taken or to be implemented	Overall	Within 7 days of a potential or actual non-compliance being known.		
EP2021/008-002:6f	Compliance Reporting	The approval holder shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this approval addressing the twelve (12) month period from the date of issue of this approval and then annually from the date of submission of the first Compliance Assessment Report, or as otherwise agreed in writing by the CEO.	CAR	Submission of CAR to the CEO.	Overall	18 September 2023 and annually thereafter or as agreed in writing by the CEO		
EP2021/008-002:6g	Compliance Reporting	The Compliance Assessment Report shall: <ul style="list-style-type: none"> <li>i. have the company seal affixed and be endorsed by the approval holder's Chief Executive Officer or a person delegated to sign on the Chief Executive Officer's behalf;</li> <li>ii. include a statement as to whether the approval holder has complied with the conditions;</li> <li>iii. identify all potential non-compliances and describe corrective and preventative actions taken;</li> </ul>	CAR	Submission of CAR to the CEO.	Overall	18 September 2023 and annually thereafter or as agreed in writing by the CEO		



Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		<ul style="list-style-type: none"> <li>iv. be made publicly available at <a href="https://www.crowley.com/darwin-australia/">https://www.crowley.com/darwin-australia/</a> in accordance with the approved Compliance Assessment Plan; and</li> <li>v. indicate any proposed changes to the Compliance Assessment Plan required by condition 6a.</li> </ul>						
EP2021/008-002:7a	Monitoring and Auditing	<p>The approval holder must design and implement a monitoring program, to the satisfaction of the CEO, which demonstrates compliance with condition 10g and 10l of this environmental approval. The monitoring program must include:</p> <ul style="list-style-type: none"> <li>i. the collection of baseline data over an appropriate time period;</li> <li>ii. appropriate monitoring of relevant parameters in accordance with Appendix 2 of this approval</li> <li>iii. a system for recording and maintaining monitoring details and data records; and</li> <li>iv. a quality assurance and quality control system.</li> </ul>	Environmental Monitoring Program (Water)	Submission of environmental monitoring reports to the CEO.	Overall	For the life of the action		
EP2021/008-002:7b	Monitoring and Auditing	<p>The approval holder must develop and implement an environmental audit program for the site. The program must:</p> <ul style="list-style-type: none"> <li>i. be developed by a qualified person, and approved by the CEO prior to commissioning of the action;</li> <li>ii. verify that the safeguards specified in this environmental approval are implemented and maintained;</li> <li>iii. evaluate the effectiveness of the safeguards for the protection of the environment applied or adopted in relation to the action;</li> <li>iv. evaluate compliance with the conditions of this environmental approval; and</li> <li>v. verify that environmental monitoring, maintenance and record keeping are being undertaken in accordance with the Compliance Assessment Reporting process required under condition 6, and the approval holder's EMS.</li> </ul>	EMS	Development of the audit program and submission to the CEO for approval.	Overall	Audit program to be implemented and demonstrated by 18 November 2023 and 18 November 2024 then as determined by the CEO thereafter.		
EP2021/008-002:7c	Monitoring and Auditing	<p>The audit program must include an audit within two (2) months of the completion of construction of the action, and an audit within two (2) months after the first year following commissioning of the action. Thereafter, auditing of the action will be conducted at a frequency determined by the CEO.</p>	EMS	Implementation and reporting of the audit program.	Overall	Firstly by 2 December 2023 and then on 2 December 2024 then as determined by the CEO thereafter.		
EP2021/008-002:7d	Monitoring and Auditing	<p>The approval holder must ensure that, within 20 business days of conclusion of each environmental audit, it provides to the CEO:</p>	Audit Program	Audit Report and evidence of closing out any non-conformances or actions	Overall	Firstly by 2 December 2023 and then on 2 December 2024 then as determined by the CEO thereafter.		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		i. a written report on the environmental audit required by condition 7c that is prepared and signed by the qualified person who conducted the audit; and ii. a written report from the approval holder that responds to each potential and actual non-compliance identified in the written audit report.						
EP2021/008-002:8	Notification of environmental incidents	Notification of environmental incidents must be in accordance with Part 9 Division 8 of the Environment Protection Act 2019 and Part 10 of the Environment Protection Regulations 2020.  In an emergency, the NT EPA Pollution Response Hotline should be notified in the first instance by telephoning 1800 064 567.	Notification of Incidents included in the CAR.	Records of Incidents and Notifications	Overall	18 September 2023 and annually thereafter		
EP2021/008-002:9	Public availability of data	Subject to confidentiality of information requirements under Part 13, Division 3 of the Environment Protection Act 2019, within six (6) months of commencement of the action and for the remainder of the life of the action, the approval holder is required to publish and make publicly available, in the form and manner approved by the CEO, all available environmental data, including sampling design, sampling methodologies, empirical data and derived information products (e.g. maps), monitoring records, management plans, reports and audits relevant to the assessment of the action and implementation of the environmental approval.	All reports and management plans relevant to the assessment of the Project are publicly available on the EPA website. All reports relevant to this proposal and implementation of this Statement, including those required by Conditions 6 and 7 and, will be made publicly available on Crowley website in accordance with Conditions 9.	<a href="https://www.crowley.com/darwin-australia/">https://www.crowley.com/darwin-australia/</a>	Overall	29 May 2023 then ongoing for the life of the action		
EP2021/008-002:10a	Marine environmental quality	Take all reasonably practicable measures during the planning, design, construction, operation, remediation and closure of the action to avoid and mitigate impacts attributable to the action on the quality and productivity of water, sediment and biota beyond the boundary of the premises.	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	For the life of the action		
EP2021/008-002:10b	Marine environmental quality	Ensure there is no migration or overflow of a contaminant or waste beyond the boundary of the premises, which causes or may cause environmental harm.	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the Environmental Monitoring Program and reporting in the CAR.	Overall	For the life of the action		
EP2021/008-002:10c	Marine environmental quality	Ensure all fuel storage tanks are designed and constructed in accordance with API Standard 650 welded tanks for oil storage, and must include: i. impermeable sub-grade release prevention barriers; and ii. under tank leak detection systems.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-002:10d	Marine environmental quality	Ensure that storage tanks and bunds on the premises are designed and constructed to minimise the potential for	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		overflow of containment structures from dynamic pressure and product wave in the event of catastrophic tank failure.						
EP2021/008-002:10e	Marine environmental quality	Take all reasonably practicable measures to ensure that stormwater within the premises does not come into contact with a contaminant, which causes or may cause environmental harm.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-002:10f	Marine environmental quality	Maintain capacity at all times to contain stormwater that has the potential to be contaminated within the boundary of the premises up to a 2% Annual Exceedance probability 24-hour rainfall event. The height of bund walls must not be less than 3 metres.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-002:10g	Marine environmental quality	Ensure that any stormwater that has the potential to be contaminated with hydrocarbons is retained on the premises and treated through an oily water separation device to a quality in accordance with Table 1 of Appendix 2 of the approval. .	Design and Engineering Specifications Environmental Monitoring Program	Audit program, verification of the approved design, reporting on environmental monitoring	Overall	For the life of the action		
EP2021/008-002:10h	Marine environmental quality	Ensure and be able to validate that any water (including stormwater) discharged from the premises does not contain a contaminant or waste, except as specifically authorised by another condition of the approval.	Design and Engineering Specifications Environmental Monitoring Program	Audit program, verification of the approved design, reporting on environmental monitoring	Overall	For the life of the action		
EP2021/008-002:10i	Marine environmental quality	Ensure that wastewater (not including sewage) is not discharged from the premises unless all other reasonably practicable measures for re-use or controlled removal of wastewater from the premises have been excluded, in accordance with the waste management hierarchy.	Design and Engineering Specifications Environmental Monitoring Program	Audit program, verification of the approved design, reporting on environmental monitoring	Overall	For the life of the action		
EP2021/008-002:10j	Marine environmental quality	Ensure any discharge of wastewater to the environment from the premises, after consideration of condition 10i, must::  i. be controlled, such as through a pipe, in a manner that does not cause erosion;  ii. be recorded, including details of the date, time, discharge point location, name of the person monitoring the discharge, and the volume and rate of discharge; and  iii. be of a quality that meets 95% species protection for marine water under the Australian & New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018), except as specifically authorised by another condition of this approval.	Environmental Monitoring Program	Reporting on environmental monitoring	Overall	For the life of the action		
EP2021/008-002:10k	Marine environmental quality	Implement best available practices for:  i. Handling, transport, storage, use and disposal of firefighting foams containing PFAS; and  ii. Phasing out use of firefighting foams containing PFOA, PFOS, PFHxS, and precursor compounds to PFOA, PFOS, and PFHxS where this does not compromise safety requirements.	EMS and SOP's	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	For the life of the action		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
EP2021/008-002:10l	Marine environmental quality	The approval holder must conduct surface water and groundwater quality monitoring within the premises, in accordance with the monitoring program under condition 7 that measures the parameters listed in Appendix 2.	Environmental Monitoring Program	Reporting on environmental monitoring	Overall	For the life of the action		
EP2021/008-002:11a	Air Quality	Take all reasonably practicable measures during the planning, design, construction, operation, remediation and closure of the action to avoid and mitigate impacts attributable to the action on air quality beyond the boundary of the premises.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-002:11b	Air Quality	Plan, design, construct, operate, remediate and close the action using best available techniques to minimise emissions of volatile organic compounds to air.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-002:11c	Air Quality	Within 20 business days after the commencement of construction of the action, complete: <ul style="list-style-type: none"> <li>i. a Level 1 air quality impact assessment (AQIA) of the operational design of the action; and</li> <li>ii. if required following completion of the Level 1 assessment, a Level 2 (refined dispersion modelling) AQIA for operation of the action.</li> </ul>	AQIA	AQIA Reports submitted to the CEO in electronic form by emailing environmentalregulation@nt.gov.au.	Construction	By 2 March 2022 for Level 1 AQIA Level 2 TBC		
EP2021/008-002:11d	Air Quality	Undertake the AQIA in accordance with Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (State of NSW and Environment Protection Authority [EPA] 2016 or latest version), to the satisfaction of the CEO. An AQIA report must be provided to the CEO within 20 business days of completing the AQIA.	AQIA	AQIA Reports submitted to the CEO in electronic form by emailing environmentalregulation@nt.gov.au.	Construction	By 30 March 2022		
EP2021/008-002:11e	Air Quality	Ensure control equipment for tanks storing jet fuel includes: <ul style="list-style-type: none"> <li>i. in tanks with F34 flammable jet fuel, a floating cover constructed of material impervious to vapour that, under normal operating conditions, floats on the surface of the liquid inside a fixed roof; and</li> <li>ii. if the AQIA undertaken in accordance with conditions 11c and 11d indicates that there is the potential for significant impacts to air quality from the action beyond the boundary of the premises, a vapour recovery system (no incineration) at loading/unloading points.</li> </ul>	Design and Engineering Specifications	Verification of the approved design and the AQIA Report	Overall	For the life of the action		
EP2021/008-002:11f	Air Quality	Implement emission mitigation measures for volatile organic compounds (no incineration) if the turnover of the total volume of 300 million litres (ML) of stored jet fuel on the premises is exceeded in any year.	Design and Engineering Specifications	Verification of the approved design and the AQIA Report	Overall	For the life of the action		
EP2021/008-002:11g	Air Quality	Undertake annual monitoring for total volatile organic compounds and BTEX at the boundary of the operating premises in accordance with approved air emission monitoring techniques in the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales (EPA 2016), or latest version, to the satisfaction of the CEO. The results from annual monitoring must be	Air Quality Monitoring Program and the CAR	Submission of air quality monitoring program and reports and the CAR to the CEO in electronic form by emailing environmentalregulation@nt.gov.au	Overall	For the life of the action		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		evaluated as part of the Compliance Assessment Reporting process required under condition 6.						
EP2021/008-002:11h	Air Quality	Within the period of the first turnover and during a period in which the action is operating under predicted maximum emission levels (i.e. during tank filling), undertake a sampling program to confirm the air emission performance of the premises. The sampling program must measure, as a minimum: <ul style="list-style-type: none"> <li>i. organic vapours concentration at point source discharge point/s such as tank vents or</li> <li>ii. vapour recovery systems using the appropriate test method/s.</li> </ul>	Air Quality Monitoring Program and the CAR	Submission of air quality monitoring program and reports and the CAR to the CEO	Overall	By the completion of the first turnover TBC		
EP2021/008-002:11i	Air Quality	Within six weeks of sampling referred to in condition 11h (unless otherwise agreed by the CEO), provide a written verification report to the CEO. The report must: <ul style="list-style-type: none"> <li>i. all analytical results of sampling required for all discharge points (any external report must be reproduced in full);</li> <li>ii. all relevant Australian Standard (AS) information in relation to establishing, siting, operating and maintaining meteorological monitoring equipment i.e. the latest versions of:                             <ul style="list-style-type: none"> <li>a. AM-1 Guide for the siting of sampling units (AS/NZS 3580.1.1)</li> <li>b. AM-2 Guide for measurement of horizontal wind for air quality applications (AS 3580.14)</li> <li>c. AM-4 Meteorological monitoring guidance for regulatory modelling applications (AS 3580.14 or USEPA 454/R-99-005).</li> </ul>                             Also, the meteorological stations will use an anemometer with a stall speed of 0.5 m/s or less;                         </li> <li>iii. a description of operational parameters during sampling relevant for air emissions estimates; and</li> <li>iv. a comparison of analytical results from sampling against final design emission specifications and modelled emission parameters in the AQIA required under conditions 11c and 11d.</li> </ul>	Air Quality Monitoring Program and the CAR	Submission of air quality monitoring program and reports and the CAR to the CEO	Overall	Within 6 weeks of sampling conducted under the Air Quality Monitoring Program.		
EP2021/008-002:11j	Air Quality	Ensure that where any comparison under condition 11i identifies measured emission concentrations or rates that are more than 15% greater than the emissions characteristics used in the AQIA or are greater than the Protection of the Environment Operations (Clean Air) Regulation 2021 standards of concentration: <ul style="list-style-type: none"> <li>i. provide an updated validated air dispersion model report to confirm compliance with the impact assessment criteria contained in the Approved Methods for the Modelling and</li> </ul>	EMS and the Air Quality Monitoring Program	Review air quality monitoring data and compare with AQIA modelling	Overall	TBC		

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status	Further Information
		Assessment of Air Pollutants in New South Wales (EPA 2016) or the latest version; and  ii. if requested by the CEO, identify and record as part of the EMS, measures to be implemented to reduce emissions of air pollutants so that they comply with the relevant NSW Clean Air Regulation standards and assessment criteria in the Approved Methods for the Modelling and Assessments of Air Pollutants in New South Wales (NSW EPA 2016) or the latest version.						
EP2021/008-001:11k	Air Quality	Ensure the final design, installation and operation of the plant does not preclude the ability for air pollution emissions controls to be retrofitted.	Design and Engineering Specifications	Audit program and verification of the approved design	Overall	For the life of the action		
EP2021/008-001:12a	Closure of action	The approval holder is required to assess the premises for contamination in accordance with the National Environment Protection (Assessment of Site Contamination) Measure (as amended from time to time). If the premises is contaminated, it must be remediated in accordance with the CRC CARE National Remediation Framework prior to closure of the action, or as otherwise specified to the satisfaction of the CEO.	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	TBC		
EP2021/008-001:12b	Closure of action	The approval holder must submit to the CEO a plan for closure of the action within a period not less than three (3) years prior to closure of the action, or within a period determined by the CEO if the environmental approval is revoked by the Minister.	EMS	Evidence of Implementation of the ISO 14001 Environment Management System (EMS) and the associated policies, manuals, procedures and registers reporting in the CAR.	Overall	TBC		

Notes

- Phases that apply in this table = Pre-Construction, Construction, Operation, Overall (several phases).
- Audit Codes reference conditions within the Environmental Approval EP2021/008-002
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the approval for full detail and precise wording of individual elements.
- Acronyms list: CAR = Compliance Assessment Report; CAP = Compliance Assessment Plan; CEO = Chief Executive Officer of DEPWS; DEPWS = Department of Environment, Parks and Water Security.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non-compliant, NR = Not required at this stage. Note the terms VR = Verification Required and IP = In Process are only for DEPWS use.