

Project Caymus Compliance Assessment Report

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Declaration of Accuracy

In making this declaration, I am aware that section 150 of the *Environment Protection Act 2019* makes it an offence in certain circumstances to knowingly provide false or misleading information or documents. I declare that all the information and documentation supporting this compliance report is true and correct in every particular.

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1. Introduction

Crowley Australia Pty Ltd (Crowley) as proponent for the Project Caymus Bulk Fuel Storage Facility was issued with an Approval under the Environment Protection Act 2019 (EP Act) (EP2021/008 – 001) on 29 November 2021. The Approval was subsequently amended by variations to conditions 6(d), 11(i), 11(j) made pursuant to Section 65 of the EP Act. The Approval is now referenced as EP2021/008 – 002.

Condition 6(f) of EP2021/008 – 002 requires Crowley to submit a Compliance Assessment Report (CAR) to the CEO of the Department of Lands, Planning and Environment (DLPE) (formerly DEPAWS) within 15 months from commencement of the issue of the approval, or as otherwise agreed with the CEO, with each subsequent report submitted within 12 months from the date of the previous report. This is the third CAR, covering the period **29 November 2024 to 28 November 2025**, originally submitted on 27 February 2026.

On 25 March 2026, Crowley received a response from DLPA titled *Re: Request for resubmission - 2026 Compliance Assessment Report for Project Caymus* (Attachment A) that provided several comments on the report and requested that Crowley submit a revised CAR by 30 April 2026.

Approval from the CEO for the updated CAR timeline was obtained as outlined in Section 1.1.

Specific Project details are provided in Table 1-1, with an overview and status of activities described in Section 2.

Table 1-1: Project Caymus details

Item	Project Details
EP Number	EP2021/008 – 002
Project Name	Project Caymus
Approval Holder	Crowley Australia
Approval holder ABN	654 468 836
Approved Action	To construct and operate a bulk fuel storage facility and ancillary infrastructure for the transfer and storage of jet fuel, East Arm, Darwin.

1.1 Purpose and Scope

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

The purpose of this Compliance Assessment Report is to meet the requirements of the Approval, including:

Condition 6f:

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.

Note: DLPE granted Crowley an extension for the submission date of the first CAR on October 31, 2023. DLPE requested that the reporting period cover a period of 24 months (November 29, 2021 – November 28, 2023; see reference to this in Appendix A).

Condition 6g:

The Compliance Assessment Report shall:

- 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;*
- ii. *include a statement as to whether the approval holder has complied with the conditions;*
- iii. *identify all potential non-compliances and describe corrective and preventative actions taken;*
- iv. *be made publicly available at www.crowley.com in accordance with the approved Compliance Assessment Plan; and*
- v. *indicate any proposed changes to the Compliance Assessment Plan required by condition 6a.*

This Compliance Report addresses compliance with the Approval conditions and associated plans, programs and strategies during the **period of 29 November 2024 to 28 November 2025**.

1.1.1 Variations Under EP2021/008 – 002

It is noted that several conditions in the original Approval (EP2021/008-001) were amended during the first reporting period through an "Application for a review of a decision" submitted to DLPE on 18th January 2023. A formal response was received on 25 May 2023, which included following agreed new/amended conditions:

Condition 6(d):

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.

Condition 11(i):

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 will include:

- i. *all analytical results of sampling required for all discharge points (any external report must be reproduced in full);*
- ii. *all relevant Australian Standard (AS) information in relation to establishing, siting, operating and maintaining meteorological monitoring equipment i.e. the latest versions of:*
 - a. *M-1 Guide for the siting of sampling units (AS/NZS 3580.1.1)*
 - b. *AM-2 Guide for measurement of horizontal wind for air quality applications (AS 3580.14)*
 - c. *AM-4 Meteorological monitoring guidance for regulatory modelling applications (AS 3580.14 or USEPA 454/R-99-005).*

Also, the meteorological stations will use an anemometer with a stall speed of 0.5 m/s or less;

- iii. *a description of operational parameters during sampling relevant for air emissions estimates; and*
- 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.*

Condition 11(j):

Ensure that where any comparison under condition 11i identifies measured emission concentrations or rates that are significantly 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:

- 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 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.*

1.1.2 DLPE Approved and/or Reviewed Plans

Table 1-2 provides an overview of the relevant environmental plans submitted to DLPE and in use from **29 November 2024 to 28 November 2025**.

Table 1-2: Submitted / Active Plans

Title	Description
Construction Environmental Management Plan (CEMP)	The CEMP outlines how construction activities will be managed in order to avoid/mitigate environmental or nuisance impacts, and how those environmental management requirements will be implemented, monitored and maintained in a compliant state. The Construction Environmental Management Plan was designed in accordance with EP2001/008 -002 Condition 10.
Erosion and Sediment Control Plan (ESCP)	The Erosion and Sediment Control Plan describes the minimum required erosion control measures for the desired works. The ESCP was submitted in accordance with EP2001/008-001 Condition 10 and acknowledged by DLPE on the 14/9/2023.
Compliance Assessment Plan (CAP)	The Compliance Assessment Plan outlines how compliance with the Approval will be assessed and reported. This includes a description of the assessment process, frequency of compliance reporting and retention of compliance assessment records. The CAP was submitted in accordance with EP2001/008-001 Condition 6. DLPE responded on 7/9/2023 stating that the CAP satisfies requirements.
Environmental Management System (EMS)	The Environmental Management System establishes the processes used to assess and mitigate potential environmental impacts associated with operational site activities. The EMS was designed in accordance with EP2001/008-002 Condition 5a. It was initially published for use on 30/8/2025.
Environmental Monitoring Program (EMP)	The Environmental Monitoring Program outlines how ongoing environmental monitoring will be conducted. This program supersedes the Wastewater Management Plan and the Dewatering Management Plan. The EMP was submitted in accordance with EP2001/008-002 condition 7/10. Response was received from DLPE on 8/11/2024 stating that it satisfied requirements.
Air Quality Monitoring Plan (AQMP)	The Air Quality Monitoring Plan describes the measures in place to minimise emissions of volatile organic compounds and potential damage to environmental values associated with the Project Caymus Bulk Fuel Storage Facility. It describes the methodology, approach and environmental criteria used in the monitoring program. The AQMP was submitted in accordance with EP2001/008-001 Condition 11 to DLPE.
Air Quality Monitoring Plan – Tank Filling Event (AQMP-TFE)	The Air Quality Monitoring Plan – Tank Filling Event describes the methodology and timing for conducting the monitoring associated with Condition 11h of EP2001/008-001. The AQMP-TFE was submitted in July 2025 in accordance with EP2001/008-001 Condition 11h to DLPE.

2. Description of Activities

2.1 Project Caymus Project Overview

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 facility will have a total storage capacity of 300 Mega Litres (ML) of jet fuel comprising the following:

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

The Approval (Appendix 1, EP2021/008 – 001) authorises the storage of JP8 (F34) and JP5 (F44), in accordance with the relevant U.S. Military Specifications. Crowley notes that Jet A-1 (F35) is stored onsite and is the primary ingredient of JP-8.

Jet A-1 and JP-8 are operationally equivalent for storage and handling, with the primary difference being the presence of additional military additives in JP-8.

For consistency and clarity, the report will now refer to **Jet A-1** and **JP-5**.

2.2 Location

Approved locations of physical and operational elements:

Element: New pipeline easement

- Section 5720 Hundred of Bagot, Freehold, Town Planning Zone DV, 740 Berrimah Rd.
- Section 5719 (right of way behind Vopak), Hundred of Bagot, Freehold, Town Planning Zone MZ, 780 Berrimah Rd

Element: Pipeline route

- Section 07219 Hundred of Bagot plan LTO2015/060
- N.T. Portion 05986, East Arm plan S2000/206
- Section 05717 Hundred of Bagot plan S2003/201 (access only)
- Section 05719 Hundred of Bagot plan S2003/201
- Section 05720 Hundred of Bagot plan S2003/201
- Section 05783 Hundred of Bagot plan S2005/171A
- Section 04443 Hundred of Bagot plan S921090.

2.3 Current Status of Activities

Key construction activities undertaken at Project Caymus during the reporting period included:

- Bulk earthworks, equipment delivery, assembly and installation associated with the construction of the bulk fuel storage facility
- Remediation works on the under tank leak detection systems

-
- Commissioning of the four Jet A-1 tanks, with the first fill of these tanks completed in September 2025
 - Commissioning of the JP-5 tanks was ongoing during the reporting period. The first shipment of JP-5 fuel was brought to the site in February 2026, outside of the reporting period.
 - Commissioning of the fuel tanker gantry system is ongoing and no fuel has left the site
 - Environmental inspection and monitoring of construction activities
 - Development of operational, environmental and safety documentation for use in future operations

3. Compliance with Environmental Approval Conditions

The terms and definitions provided in Table 3-1 have been used to indicate the status of compliance with relevant EP2021/008 – 002 approval conditions.

A summary of the compliance status with relevant EP2021/008-002 approval conditions (Section 1.1), applicable timeframes and reference to evidence supporting the compliance status (as applicable) is provided in Table 3-3.

Table 3-1 Compliance status terms, acronyms and definitions

Term	Acronym	Definition
Compliant	C	Compliance is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	NC	A designation of "non-compliance" is given where the requirements of a condition, or elements of a conditions, including the implementation of management plans and other measures, have not been met.
Not applicable	NA	A designation of "not applicable" is given where the requirements of a condition, or elements of a condition, fall outside of the scope of the current reporting period. For example, a condition which applies to activity that has not yet commenced.
In progress	IP	A designation of "in progress" is given where the requirements of a condition have not yet been met (e.g. during the construction phase), but actions are being taken to ensure that compliance is met in the future.

3.1 Audits, Inspections & Exercises

A summary of the environmental audits, inspections and exercises (as relevant to EP2021/008 – 002) undertaken during the reporting period is provided in Table 3-2. Outcomes of audits as applicable to EP2021/008 – 002 conditions are presented in Table 3-3.

Table 3-2: Summary of Audits, Inspections & Reviews

Audits, Inspections & Reviews	Scope	Date
Crowley Project Caymus Discharge Monitoring	The discharge monitoring included weekly sampling of stormwater discharge by Crowley in accordance with the Environmental Monitoring Program.	Sampling commenced on 19 November 2024, with weekly samples collected during discharge events (Refer Appendix C)
Daily, weekly and monthly general site inspections.	Inspections are completed by site operators on a daily, weekly and monthly basis, targeting general site and equipment maintenance.	Ongoing

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Table 3-3: EP2021/008-002 Approval Compliance Table

Condition No.	Condition	Timing	Status	Evidence/Comments
1a	Commencement of action. 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.	By 29 November 2023	Compliant	Commencement of action letter submitted under Condition 1b on 15 February 2022. Picture 1 – Photo demonstrating substantial commencement of project. 
1b	Commencement of action. 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.	Within 10 business days after commencement of the action	Compliant	A letter was sent to the CEO on 15 February 2022 notifying the commencement of construction. Photos demonstrating the substantial commencement of the Project are provided. (Attached as Appendix B).

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Condition No.	Condition	Timing	Status	Evidence/Comments
2	Proposal implementation. The action must be carried out: I. In accordance with the Environment Protection Act 2019; II. In accordance with this approval; III. In a competent manner; and IV. Wholly within the premises as identified in the approval	Ongoing	In Progress	Crowley has demonstrated compliance with this condition as evidenced in the previous CAR submitted to the EPA on 6/5/2025. Where non-compliances are identified (refer to Condition 6e) the relevant parties have been notified.
3	Change of 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.	Within 10 business days of a change in name, physical address or postal address.	Compliant	No changes to contact details in the reporting period.
4	Operation and maintenance of plant and equipment. The approval holder must ensure any plant and equipment used in conducting the action: I) Is fit for the purpose and use to which it is put; II) Is maintained; III) Is operated by a person trained to use the plant and equipment; and IV) Is calibrated in accordance with Australian Standard methods.	Ongoing	In progress	Crowley is actively progressing the development of plant and equipment registers and associated maintenance schedules. These will be complete and fully implemented as part of the commissioning process. A Construction Environment Management Plan (CEMP) was implemented during the construction phase of the action. An Environmental Management System (EMS) has been finalised (this is a live document and will be continually updated). Embedding of the EMS in routine site activities will continue during the commissioning process.
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	September 26, 2025	Compliant	The EMS was designed in accordance with EP2001/008-002 Condition 5a and is aligned with <i>ISO14001 Environmental Management Systems Standard</i>. It was initially published for use on 30/8/2025.

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Condition No.	Condition	Timing	Status	Evidence/Comments
	consistent with ISO 14001 Environmental Management Systems			Embedding of the EMS in routine site activities will continue during the commissioning process.
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: I) all applicable Australian Standards, including but not limited to AS1940 and AS1692, as amended from time to time. II) all applicable American Petroleum Industry (API) standards, including but not limited to API650 and API1581, as amended from time to time.	Ongoing	In Progress	The referenced Standards were included as core compliance requirements in the project specifications and conditions of contract. This included design, equipment supply and construction contracts. The storage tanks and foundation design were certified by Saunders International on 18 April 2023 in accordance with AS 1940 and API 650 [SCO-2129-DES-CER-0001-01]. The construction of all storage tanks were certified by Golding Tank Services in accordance with API 650 [CAYM-21-2400,31-3700-STR-CER-1500] on 18 July 2025. During the previous reporting period, water was detected in the under tank leak detection system. A rectification plan which meets all relevant standards was provided to and acknowledged by DLPE. Rectification works have been completed on all four of the Jet A-1 tanks. The repairs were certified by Golding Tank Services in accordance with <i>API 653 - Tank Inspection, Repair, Alteration and Reconstruction (API 653)</i> on 28/08/2025 [CAYM-2100-STR-CER-1502 and CAYM-22/23/2400-STR-CER-1502]. Following the completion of rectification works at the Jet A-1 tanks, the first filling event occurred. During this reporting period works had just commenced on the JP-5 tanks and no fuel was being stored in the JP-5 tanks. The first JP-5 fuel was brought to site in February 2026, outside of this reporting period.
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	By 30 June 2023	Compliant	The CAP was submitted to DLPE on 7 September 2023 and was acknowledged 31 October 2023 (Refer to Appendix A).

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Condition No.	Condition	Timing	Status	Evidence/Comments
	implementation of the action, whichever is sooner.			
6b	Compliance Reporting. 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.	By 30 June 2023	Compliant	The CAP was submitted to DLPE on 7 September 2023 and was acknowledged on 31 October 2023 (Refer to Appendix A).
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.	29 February 2024 and annually thereafter	Compliant	On 28 February 2025 Crowley requested a month extension for the submission of the 2025 CAR. An extension was granted on 3 March 2025 and the CAR was submitted to DLPE on 31 March 2025.
6d	Compliance Reporting. The approval holder 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.	Retain CARs for 7 years following the end of life of the proposal. Make CARs available when requested by CEO.	Compliant	Crowley can confirm that all reports are retained on Crowley's document management system.
6e	Compliance Reporting.	Within 7 days of a potential or actual non-compliance being known	Compliant	No formal non-compliance events have been reported to the CEO within the reporting period, however the issues noted regarding the underground leak detection system have been

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Condition No.	Condition	Timing	Status	Evidence/Comments
	The approval holder shall advise the CEO of any potential or actual non-compliance within seven (7) days of that non-compliance being known.			previously communicated to DLPE. This was subsequently determined to be non-compliant with Condition 10c. Crowley are actively undertaking the rectification works which have been acknowledged by DLPE. No tank has been filled prior to the completion of rectification works. A spill occurred from Tank 9 on 21/10/2025, with an estimated volume of <150 L. The spill was fully contained within the bunded area, and no product migrated beyond the secondary containment system. It was reported to DLPE but was not considered a non-compliance as it was contained within the bunded area.
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.	29 February 2024 was the agreed date with the CEO for the first report and annually thereafter.	Compliant	The first CAR was submitted to the CEO on 29 February 2024.
6g	Compliance Reporting. The Compliance Assessment Report shall: 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; II) include a statement as to whether the approval holder has complied with the conditions; III) identify all potential non-compliances and describe corrective and preventative actions taken;	29 February 2024 was the agreed date with the CEO for the first report and annually thereafter.	Compliant	On 28 February 2025 Crowley requested a month extension for the submission of the 2025 CAR. An extension was granted on 3 March 2025 and the CAR was submitted to DLPE on 31 March 2025.

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Condition No.	Condition	Timing	Status	Evidence/Comments
	IV) be made publicly available in accordance with the approved Compliance Assessment Plan; and V) indicate any proposed changes to the Compliance Assessment Plan required by condition 6a.			
7a	Monitoring and Auditing 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: I) the collection of baseline data over an appropriate time period; II) appropriate monitoring of relevant parameters in accordance with Appendix 2 of this approval III) a system for recording and maintaining monitoring details and data records; and a quality assurance and quality control system.	Ongoing	Compliant	The Environmental Monitoring Program was developed in accordance with the conditions in EP2021/008 – 002. The EMP was submitted to the CEO for review and approval. Response was received from DLPE on 8 November 2024 stating that it satisfied requirements. Stormwater discharge monitoring has been conducted throughout the reporting period, following the requirements outlined in the EMP. Supporting data is provided in Appendix C. Baseline monitoring and reporting was conducted during the reporting period (prior to fuel being brought to the site). The baseline report (Pre-Operations Environmental Investigation) was submitted to DLPE on 16 September 2025 (results summarised in Appendix C.2.1). The first quarterly environmental (groundwater/surface water) monitoring was completed late October / early November in line with the EMP (results summarised in Appendix C.2.2). The requirements of the EMP have been implemented. The EMP will require regular updating and resubmission. Environmental records are maintained in accordance with Crowley's corporate Document Management System which includes document ID, version control, QA and document retention requirements.
7b	Monitoring and Auditing.	The environmental audit program to be implemented and	Compliant	The environmental audit program document was prepared by an independent auditor and was submitted to DLPE in July 2025. The document was prepared and the audit was

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Condition No.	Condition	Timing	Status	Evidence/Comments
	The approval holder must develop and implement an environmental audit program for the site. The program must: I) be developed by a qualified person, and approved by the CEO prior to commissioning of the action; II) verify that the safeguards specified in this environmental approval are implemented and maintained; III) evaluate the effectiveness of the safeguards for the protection of the environment applied or adopted in relation to the action; IV) evaluate compliance with the conditions of this environmental approval; and 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.	demonstrated by 26 November 2025 (two months after commissioning).		completed by a qualified person (accredited site auditor) from SAGE Environmental Services. The audit was scheduled to be completed on 23 November 2025, however due to cyclone Fina, the audit was postponed with approval from DLPE. The audit was subsequently undertaken on 8 December 2025, outside of this reporting period. No formal audits against the conditions of the Approval have been conducted in this reporting period.
7c	Monitoring and Auditing. 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.	The environmental audit program to be implemented and demonstrated by 26 November 2025 (two months after commissioning). A second audit will be conducted within 2 months after first year following commissioning (as required by the environmental approval)	In Progress	The first audit was scheduled to be undertaken on the 24 November 2025. However, due to cyclone Fina, the audit was postponed and conducted on 8 December 2025. As a result, this falls outside of this reporting period. No formal audits against the conditions of the Approval have been conducted in this reporting period.
7d	Monitoring and Auditing.	The environmental audit program to be	In Progress	The first audit was scheduled to be undertaken on the 24 November 2025. However, due to cyclone Fina, the audit was

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Condition No.	Condition	Timing	Status	Evidence/Comments
	The approval holder must ensure that, within 20 business days of conclusion of each environmental audit, it provides to the CEO: 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.	implemented and demonstrated by 26 November 2025 (two months after commissioning). A second audit will be conducted within 2 months after first year following commissioning (as required by the environmental approval)		postponed and conducted on 8 December 2025. As a result, this falls outside of this reporting period. No formal audits against the conditions of the Approval have been conducted in this reporting period.
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.	As soon as practicable after becoming aware of an environmental incident.	Compliant	PRL12901 - Minor Hydraulic Oil Spill at Project Caymus: On 13 February 2025 Crowley reported to the NT EPA the spill of approximately 1–2 litres of ISO 32 hydraulic oil from a diesel generator (the spill occurred 13 February 2025). The spill was contained in the tank bunded area. Oil was removed using absorbent pads and a vacuum truck removed contaminated water. Water samples from the oily water separator showed no hydrocarbons left the bunded area (Refer to laboratory results provided in Appendix C, Table C1). This incident was later assessed as a minor incident by an authorised officer. No further action was required. PRL12939 - Water - Harbour – Contamination at Project Caymus and Site Inspection: On 27 February 2025 a third party made several accusations regarding the environmental management of the Project Caymus site. On 4 March 2025, following an investigation into the validity of the accusations, Crowley responded to the accusations with a letter to the DLPE. The letter addressed each of the accusations individually. DLPE acknowledged receipt of the letter, no further actions were taken.
9	Public availability of data.	29 May 2023 then ongoing for the life of the action	Compliant	Crowley have published all available environmental reporting to www.crowley.com/darwin-australia/.

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	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.			
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.	Ongoing	In Progress	During the reporting period all works conducted have followed the ESCP, CEMP, EMP and/or EMS which aim to mitigate impacts to the quality and productivity of water, sediment and biota beyond the boundary of the premises. Regular environmental inspections have been undertaken to ensure construction and operation does not negatively impact the surrounding environment (summarised in Appendix C.3)
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.	Ongoing	Compliant	As per the response to Condition 10a above. Ongoing implementation of the EMS, CEMP and ESCP, supported by the EMP and CAR process demonstrates there is no release of contaminants from onsite activities. For the majority of the reporting period, plant had not yet been commissioned, resulting in limited opportunity for contamination.
10c	Marine environmental quality Ensure all fuel storage tanks are designed and constructed in accordance with API Standard	Ongoing	Non-compliant	As discussed above, during the reporting period, rectification works have been underway on leak detection systems of the tanks. The Jet A-1 tanks now have leak detection systems

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	650 welded tanks for oil storage, and must include: I) impermeable sub-grade release prevention barriers; and II) under tank leak detection systems.			installed in accordance with the listed standards. Works are underway on the JP-5 tanks. No fuel was brought to site before the rectification works were completed on the Jet A-1 tanks (the JP-5 tanks did not receive fuel during this reporting period). No environmental harm has occurred as a result of this non-compliance.
10d	Marine environmental quality Ensure that storage tanks and bunds on the premises are designed and constructed to minimise the potential for overflow of containment structures from dynamic pressure and product wave in the event of catastrophic tank failure.	Ongoing	Compliant	The tanks and bunds have been designed to meet the requirements of Condition 10d, subject to the comments above. The bunded area has been designed to comply with AS1940 and will contain > 110% of the volume of the largest tank. The bund wall height is at least 3 m, measured from ground level inside the bund as required in the Approval. The JP-5 and Jet A-1 tanks and foundation design was certified by Saunders on 18 April 2023 [SCO-2129-DES-CER-0001-01]. Compliance with API 650 construction requirements has been verified by Golding Tank Services on 18/07/2025 for Jet A-1 [CAYM-2100-STR-CER-1501 and CAYM-2200/2300/2400-STR-CER-1500] and JP-5 [CAYM-3100/3200/3300/3400/3500/3600/3700 -STR-CER-1500] Repairs undertaken in accordance with API 653 were certified by Golding Tank Services on 28/08/2025 for Jet A-1 [CAYM-2100-STR-CER-1502 and CAYM-22/23/2400-STR-CER-1501]. The JP-5 tanks were still undergoing repairs and received certification outside of the reporting period. Ongoing implementation of the EMS, CEMP and ESCP, supported by the EMP and CAR process provides evidence there is no release of contaminants from onsite activities.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
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.	Ongoing	Compliant	Ongoing implementation of the EMS, CEMP and ESCP, supported by the EMP and CAR process provides evidence there is no release of contaminants from onsite activities.
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.	Ongoing	Compliant	The tanks and bunds have been designed to meet the requirements of Condition 10f, subject to the comments above. The bunded area has been designed to comply with AS1940 and will contain > 110% of the volume of the largest tank. The bund wall height is at least 3 m, measured from ground level inside the bund as required in the Approval. Ongoing implementation of the EMS, CEMP and ESCP, supported by the EMP and CAR process provides evidence there is no release of contaminants from onsite activities.
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 this approval.	Ongoing	Compliant	Stormwater is contained in the bunded area before being released via the oil/ water separator (removes TRH) and HumeCeptor (removes TSS) to the northern drain. Water samples are collected weekly (when discharge is occurring) at the oily water separator and HumeCeptor and are tested for the parameters outlined in Table 1 of Appendix 2 (results in Appendix C.1). Ongoing implementation of the EMS, CEMP and ESCP, supported by the EMP and CAR process demonstrates there is no release of contaminants from onsite activities.
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 this approval.	Ongoing	Compliant	During the reporting period, several minor non-compliances to the Environmental Monitoring Program were noted in the stormwater discharged from the premises. The 2024/25 wet seasons saw the following exceedances (measured at the site outlet): ▪ 22 exceedances of pH (field analysed) ▪ 6 exceedances of TSS (lab analysed) ▪ 0 exceedances of TRH (lab analysed)

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
				Low pH has been an ongoing issue with stormwater discharges in the 2024/2025 wet seasons. It is understood that the pH recorded is representative of the pH found naturally in the rainwater in the area. The highest TSS concentration was recorded at DIS_01 on 17/12/24. The paired sample collected DIS_02 recorded a TSS below the limit of reporting, indicating the HumeCeptor successfully removed the TSS. Other exceedances were either collected at DIS_01 (prior to being removed by the HumeCeptor) or exceeded the guideline value by less than the margin for error in the laboratory analysis. TRH was recorded below the limit of reporting in all samples during the reporting period. A summary of the monitoring data is provided in Appendix C.1.
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.	Ongoing	Compliant	There are limited opportunities to re-use wastewater onsite at this stage of the project (wastewater not usually available during dry season where wastewater could be used to irrigate the site). Where deemed necessary, water vacuum trucks have been employed to remove potentially contaminated water from site. Surface water discharge monitoring is ongoing in accordance with Environmental Monitoring Program and will be reported in the CAR.
10j	Marine environmental quality. Ensure any discharge of wastewater to the environment from the premises, after consideration of condition 10i, must: 1) be controlled, such as through a pipe, in a manner that does not cause erosion;	Ongoing	Compliant	Any wastewater discharged from site goes through the onsite stormwater management infrastructure, including bunding, diversion drains, sump pumps, oily water separator and HumeCeptor which have been designed to meet the requirements of Condition 10j.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	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.			Wastewater samples are compared against the 95% thresholds for marine species protection as published in the Australian & New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018). Records of all water sampling events are recorded on the site's discharge monitoring register [ENV-REG-008]. If wastewater does not meet these guidelines, alternate disposal methods are used (e.g. removal via licenced waste contractors). Surface water discharge monitoring is ongoing in accordance with Environmental Monitoring Program and will be reported in the CAR.
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.	Ongoing	Compliant	The use of PFAS / PFOS containing fire-fighting materials is not included in the design specification and are not permitted onsite.
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.	Ongoing	Compliant	Baseline monitoring and reporting was conducted during the reporting period (prior to fuel being brought to the site). This included quarterly groundwater/ surface water monitoring over a 12-month period. The baseline report (Pre-Operations Environmental Investigation) was submitted to DLPE on 16 September 2025. The first quarterly environmental monitoring event was conducted after first fuel was brought to site in completed late October / early November, in line with the EMP. The subsequent monitoring report was submitted outside this reporting period.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
11a	Air Quality. The approval holder must ensure there are no attributable impacts on the Darwin airshed and must 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.	Ongoing	Compliant	The tank venting and fuel transfer process has been designed to meet the requirements of Condition 11a. The EMS and EMP describe preventative and remedial measures to mitigate potential air quality impacts from site activities.
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.	Ongoing	In progress but compliant in terms of the construction component of the condition	The tank venting and fuel transfer process has been designed to meet the requirements of Condition 11b. The EMS and EMP describe preventative and remedial measures to mitigate potential air quality impacts from site activities.
11c	Air Quality. Within 20 business days after the commencement of construction of the action, complete: I) a Level 1 air quality impact assessment (AQIA) of the operational design of the action; and II) if required following completion of the Level 1 assessment, a Level 2 (refined dispersion modelling) AQIA for operation of the action.	By 2 March 2022 for Level 1 AQIA	Compliant	The Level 1 AQIA was submitted in March 2022 in accordance with Condition 11. Following comments from DLPE, a revised Level 1 AQIA was submitted to DLPE in August 2022, with a follow up technical memo submitted in December 2022. The Level 1 AQIA concluded that a level 2 assessment was not necessary at this stage.
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	By 30 March 2022	Compliant	The Level 1 AQIA was submitted March 2022 in accordance with Condition 11. Following comments from DLPE, a revised Level 1 AQIA was submitted to DLPE August 2022, with a follow up technical memo submitted in December 2022.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	satisfaction of the CEO. An AQIA report must be provided to the CEO within 20 business days of completing the AQIA.			
11e	Air Quality. Ensure control equipment for tanks storing jet fuel includes: 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 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.	Ongoing	Compliant	The tank venting and fuel transfer process has been designed to meet the requirements of Condition 11e. The outcome of the AQIA suggests that there would be negligible air quality impacts beyond the boundary as a result of the action. Therefore, no vapour recovery system has been installed. The EMS describes preventative and remedial measures to mitigate potential air quality impacts from site activities.
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.	Ongoing	NA	It is not anticipated that an annual turnover of 300 million litres (ML) will occur at the site. This site actively monitors compliance with this condition.
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	Ongoing	Compliant	Baseline air quality monitoring has been conducted in accordance with the AQMP during the monitoring program. The annual air quality monitoring report for the reporting period was submitted in March 2025. At this point annual monitoring was suspended due to sufficient baseline data being available.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	of the CEO. The results from annual monitoring must be evaluated as part of the Compliance Assessment Reporting process required under condition 6.			Annual air quality monitoring recommenced in September 2025, when fuel was first brought to site. Initial results show air quality is still comparable with baseline conditions. The Air Quality Monitoring Annual Report submitted in March 2025 summarised the data collected from 11 January 2024 to 9 January 2025. The report found no substances measured exceeded the ambient air quality standards during the monitoring period. Some data gaps were identified during the reporting period due to a range of complicating factors, these have been outlined in Section 4 of the Air Quality Monitoring Annual Report (2025b, Jacobs). However, the data captured was considered sufficiently reliable for the purpose for which it was obtained and used. The results represent the air quality conditions (hydrocarbons) in the area of the project and provide a baseline to assess air quality impacts from emissions of these pollutants once the bulk fuel storage facility is operational.
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: I) organic vapours concentration at point source discharge point/s such as tank vents or II) vapour recovery systems using the appropriate test method/s.	By the completion of the first turnover.	In Progress	The AQMP-TFE was submitted in July 2025. It outlined the methodology and timing of the air quality monitoring associated with the first tank filling event. The first of the two monitoring events outlined in the plan has been completed (the filling of the first Jet A-1 tank) and an interim report has been provided to DLPE. Note: The interim report does not address Condition 11h) or Condition i) of the Environmental Approval. These conditions will be addressed after the filling of the fixed-roof (JP-5) tanks (the worst-case air emissions scenario).
11i	Air Quality. Within six weeks of sampling referred to in condition 11h (unless otherwise agreed by the	Within 6 weeks of sampling conducted under the AQMP-TFE.	In Progress	An interim report was submitted following the completion of the first tank filling event (Jet A-1 tanks). The full report will

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	CEO), provide a written verification report to the CEO. The report must: I) include all analytical results of sampling required for all discharge points (any external report must be reproduced in full); II) include all the information listed in section 4 (meteorological data) of the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA 2016), or latest version; III) describe all the operational parameters during sampling; IV) compare analytical results from sampling against final design emission specifications and modelled emission parameters in the AQIA required under conditions 11c and 11d.			be submitted once the monitoring associated with the filling of the first JP-5 tank is complete. Note: The interim report does not address Condition 11h) or Condition i) of the Environmental Approval. These conditions will be addressed after the filling of the fixed-roof (JP-5) tanks (the worst-case air emissions scenario). The air quality monitoring is being undertaken in accordance with the AQMP-TFE.
11j	Air Quality. Ensure that where any comparison under condition 11i identifies measured emission concentrations or rates above the emissions characteristics in the revised AQIA or the Protection of the Environment Operations (Clean Air) Regulation 2021 standards of concentration: I) re-assess and evaluate both the emission concentrations against the relevant NSW Clean Air Regulation standards of concentrations and the impacts against the relevant impact assessment criteria in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA 2016), or the latest version; and/or II) identify and record as part of the EMS measures to be implemented to reduce	Ongoing	In Progress	The interim report presented emission levels significantly below those described in the AQIA. A full analysis will be conducted following the completion of the second monitoring event.

Project Caymus Compliance Assessment Report

Condition No.	Condition	Timing	Status	Evidence/Comments
	emissions of air pollutants to no greater than those predicted in the AQIA (required under condition 11c and 11d).			
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.	Ongoing	Compliant	The air handling and emissions control equipment has been designed to meet the requirements of Condition 11k.
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.	As notified	NA	The EMS and EMP describe preventative and remedial measures to mitigate potential impacts to soil and groundwater quality. A Site Remedial Plan will be prepared in accordance with the Standards referenced in Condition 12a, if required.
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.	As notified	NA	The EMS and EMP describe preventative and remedial measures to mitigate potential impacts to soil and groundwater quality. A Site Remedial Plan will be prepared in accordance with the Standards referenced in Condition 12b, if required.

4. References:

Australian Petroleum Institute, 2020, API Standard 653 – Tank Inspection, Repair, Alteration and Reconstruction

Byrne Consultants, 2023, Wet Season Erosion Sediment Control Plan

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

Jacobs, 2023, Air Quality Monitoring Plan

Jacobs, 2023, Project Caymus Compliance Assessment Plan

Jacobs, 2024, Project Caymus – Environmental Monitoring Program

Jacobs, 2025a, Air Quality Monitoring Plan – Tank Filling Event

Jacobs, 2025b, Air Quality Monitoring Annual Report

Jacobs, 2025c, Project Caymus – Pre-Operations Environmental Investigation

JBS&G, 2022, Vopak Terminals Australia Pty Ltd Environmental Audit Report

Latitude 63, 2023, Construction Environmental Management Plan

Appendix A. Compliance Assessment Plan Approval

31 October 2023

Mr June Cafirma
HSSE Manager
Crowley Australia Pty Ltd
GPO Box 1018
DARWIN NT 0801

Via email June.Cafirma@crowley.com

Dear Mr Cafirma

Re: Project Caymus – Compliance Assessment Plan Approval

Thank you for submitting the Compliance Assessment Plan (CAP) for Project Caymus as required by Environmental Approval EP2021/008 – 002.

I am satisfied that the Compliance Assessment Plan satisfies the requirements of condition 6b of the environmental approval. In accordance with condition 6c, Crowley Australia Pty Ltd is required to assess compliance with conditions in accordance with the Plan.

I note that Condition 6f of the approval required submission of the first Compliance Assessment Report by 29 February 2023. This requirement has not been met. Given the time since the report was due, and that the Compliance Assessment Plan has just been finalised, the Compliance Assessment Report due on 29 February 2024 must assess compliance in accordance with the Plan for the period 29 November 2021 to 28 November 2023 (that is, the first two years of the approval). Thereafter, reports must be submitted annually addressing compliance for the 12 month period commencing on 29 November each year, as per condition 6f of the approval.

If you have any questions about this matter, please contact Henry Berko, Senior Environment Officer, via email to environmentalregulation@nt.gov.au.

Yours sincerely



Joanne Townsend
Chief Executive Officer

Appendix B. Commencement of the Action

From: Joanne Townsend <Joanne.Townsend@nt.gov.au>
Sent: Thursday, 17 February 2022 12:45 PM
To: Richard McAllister
Cc: Amy Dennison; Gemma Sheridan; Henry Berko; Thomas, Sean; Watson, Angela; Chris Mouat
Subject: RE: Commencement of action EP2021/008 - 001 - Project Caymus Bulk Fuel Storage Facility

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Richard,

Thank you for your email and notification advice.

We are working through a more streamlined method of notification which may result in advice on an alternate email address for future correspondence.

Regards

Joanne Townsend

Chief Executive Officer
Department of Environment, Parks and Water Security
Northern Territory Government

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W: [Department of Environment, Parks and Water Security](#)

W: [Parks and Wildlife Commission](#)

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From: Richard McAllister <richard.mcallister@pfeng.com.au>
Sent: Tuesday, 15 February 2022 11:53 AM
To: Joanne Townsend <Joanne.Townsend@nt.gov.au>

Cc: Amy Dennison <Amy.Dennison@nt.gov.au>; Gemma Sheridan <Gemma.Sheridan@nt.gov.au>; Henry Berko <Henry.Berko@nt.gov.au>; Thomas, Sean <Sean.Thomas@crowley.com>; Watson, Angela <Angela.Watson@crowley.com>; Chris Mouat <Chris.Mouat@nt.gov.au>
Subject: Commencement of action EP2021/008 - 001 - Project Caymus Bulk Fuel Storage Facility

Hi Jo,

Please find attached notification of commencement of action as required under section 1(b) of EP2021/008 - 001 - Project Caymus Bulk Fuel Storage Facility, signed by Sean Thomas, Director, Crowley Australia.

If you have any questions, please don't hesitate to contact myself, Sean or Angela, copied into this email.

Best Regards

Richard

Richard McAllister
Regional Director – Northern Territory
MEnvEngSci FIEAust CPEng EngExec MAusIMM
President Northern Division Engineers Australia



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Appendix C. Environmental Monitoring and Inspections

C.1 Discharge Monitoring

Discharge sampling occurs on a weekly basis when water is being discharged from site. The discharge monitoring includes the collection of a water sample from the oily water separator and from the north-western Humeceptor. These samples are sent to a NATA accredited laboratory and tested for the analytes listed in Appendix 2, Table 2 of EP2021/008 – 001. Field parameters (pH and EC) are also recorded at each location.

Results from the discharge sampling conducted during the reporting period are shown in Table C 1.



C.1.1 Limit exceedance assessment outcomes

Throughout the reporting period there were several exceedances noted:

- pH consistently exceeded the guideline value. It is understood that the pH recorded is representative of the pH found naturally in the rainwater in the area.
- Sample SWM_01 and SWM_02 were collected from inside the bunded area during a period where the oily water separator was undergoing maintenance. pH and TRH were within the discharge water quality parameters, TSS exceeded, however would have decreased once it passed through the Humeceptor.
- A sample was collected from the Tank 9 bunded area on 17/11/25 post a fuel spill. No TRH were recorded in this sample, suggesting the post spill clean-up had been effective.
- All discharge samples (collected from DIS01 and DIS02) were analysed for parameters outlined in Table 1, Appendix 2 of the environmental approval (shown in Lab Results columns). Field parameters were also collected.

The site's pH meter was damaged in December 2024, resulting in a gap in the field monitoring data from 17/12/2024 to 10/02/2025 while a new pH meter was acquired. The field data is used as a secondary layer of evidence to the laboratory results. As such, statements about water quality compliance can be made solely on laboratory results for this period.

Table C 1: Discharge Monitoring Register

Date	Time	Location	Sample Taken by	Field Parameters			Site Observations	COC#	Lab Results			Comments
				pH	EC (µS/cm)	Temp (°C)			pH	TSS (mg/L)	TRH (µg/L)	
28/11/2024	1237	DIS01	D.Coffey	Error	Error	37.5	Water quality meter malfunctioned	ES2438817	6.55	14	<100	
28/11/2024	1244	DIS02	D.Coffey	Error	Error	35.7	Water quality meter malfunctioned	ES2438818	6.86	22	<100	
3/12/2024	1205	DIS02	D.Coffey	5.06	160.6	31		ES2439430	6.71	5	<100	Sampled for ANZG guideline values (as part of the baseline monitoring program (SWOZ in lab doc)). Zinc = 70 µg/L
17/12/2024	11:30	DIS01	D.Coffey	NA	NA	NA	No water quality meter available	ES2441194	7.33	229	<100	TSS value below guideline value at DIS02 (Humeceptor)
17/12/2024	11:40	DIS02	D.Coffey	NA	NA	NA	No water quality meter available	ES2441194	6.89	<5	<100	
7/1/2025	12:00	DIS01	J.Timm	NA	NA	NA	No water quality meter available	ES2500252	6.58	<5	<100	
7/1/2025	12:10	DIS02	J.Timm	NA	NA	NA	No water quality meter available	ES2500252	6.77	<5	<100	
14/1/2025	8:30	DIS01	J.Timm	NA	NA	NA	No water quality meter available	ES2500771	7.16	<5	<100	
14/1/2025	8:30	DIS02	J.Timm	NA	NA	NA	No water quality meter available	ES2500771	7.14	<5	<100	
20/01/2025	11:30	DIS01	D.Coffey	NA	NA	NA	Water going through oily water separator - Originating from Tank 11	ES2501374	6.53	<5	<100	Sampled for ANZG guideline values. Zinc = 315 µg/L
20/01/2025	11:30	DIS02	D.Coffey	NA	NA	NA	No water quality meter available	ES2501374	7.23	<5	<100	Sampled for ANZG guideline values. Zinc = 17 µg/L
29/01/2025	6:00	DIS01	J.Timm	NA	NA	NA	No water quality meter available	ES2502166	6.66	7	<100	
29/01/2025	6:10	DIS02	J.Timm	NA	NA	NA	No water quality meter available	ES2502166	6.8	6	<100	
3/2/2025	1200	DIS01	J.Timm	NA	NA	NA	No water quality meter available	ES2502821	6.79	<5	<100	
3/2/2025	1200	DIS02	J.Timm	NA	NA	NA	No water quality meter available	ES2502821	7.03	<5	<100	
10/2/2025	8:30	DIS01	G.Stewart	NA	NA	NA	No water quality meter available	ES2503596	6.65	<5	<100	
10/2/2025	8:30	DIS02	G.Stewart	NA	NA	NA	No water quality meter available	ES2503596	6.85	<5	<100	
17/02/2025	7:45	DIS01	J.Timm	6.39	70	25.3		ES2504391	7.13	<5	<100	
17/02/2025	7:45	DIS02	J.Timm	5.96	71	25		ES2504391	7.14	<5	<100	
25/2/2025	7:45	DIS01	G.Stewart	6.19	70	27.2		ES2504851	6.94	<5	<100	
25/2/2025	7:45	DIS02	G.Stewart	6.86	71	27.3		ES2504851	6.99	<5	<100	
3/3/2025	7:00	DIS01	G.Stewart	6.86	70	27.2		ES2505944	7.16	<5	<100	
3/3/2025	7:00	DIS02	G.Stewart	6.86	71	27.2		ES2505944	7.38	<5	<100	
17/3/2025	12:00	DIS01	G.Stewart	5.72	91	27.1		ES2507436	6.77	10	<100	
17/3/2025	12:00	DIS02	G.Stewart	5.85	88	27.3		ES2507436	7	<5	<100	
24/3/2025	8:45	DIS01	J.Timm	5.88	108	28.7		ES2508250	7.2	<5	<100	
24/03/2025	9:00	DIS02	J.Timm	5.75	248	28.4		ES2508250	7.28	<5	<100	
31/03/2025	1630	DIS01	J.Timm	6.1	120	28.5		ES2509058	7.03	<5	<100	
31/03/2025	1630	DIS02	J.Timm	6	117	28.4		ES2509058	7.06	<5	<100	
7/4/2025	8:00	DIS01	J.Timm	6.12	129	29.3		ES2509866	7.05	8	<100	
7/4/2025	8:15	DIS02	J.Timm	6.2	131	29.2		ES2509866	7.37	<5	<100	
14/4/2025	7:30	DIS01	G.Stewart	5.83	207	26.7		ES2510717	7.31	<5	<100	
14/4/25	7:30	DIS02	G.Stewart	5.19	70	28		ES2510717	7.14	<5	<100	

Date	Time	Location	Sample Taken by	Field Parameters			Site Observations	COC#	Lab Results			Comments
				pH	EC (µS/cm)	Temp (°C)			pH	TSS (mg/L)	TRH (µg/L)	
22/4/25	9:00	DIS01	J.Timm	7.21	121	28.7		ES2511024	7.07	<5	<100	
22/4/25	9:00	DIS02	J.Timm	5.9	129	28.6		ES2511024	7.38	<5	<100	
28/4/25	7:45	DIS01	G.Stewart	7.44	129	28.7		ES2511936	6.03	<5	<100	
28/4/25	7:45	DIS02	G.Stewart	5.66	145	26.8		ES2511936	6.47	<5	<100	
23/9/25	10:00	SWM_01	D.Coffey					ES2529436	7.07	39	<100	Sample collected from JP-5 bunded area. TSS expected to decrease once processed through the Humeceptor
23/9/25	10:00	SWM_02	D.Coffey					ES2529436	7.19	76	<100	Sample collected from Jet A-1 bunded area. TSS expected to decrease once processed through the Humeceptor
30/10/25	12:00	DIS01	G.Stewart	7.11	0.24	28.6		ES2534012	7.43	60	<100	
30/10/25	12:00	DIS02	G.Stewart	6.75	0.34	30.6		ES2534012	7.44	38	<100	
5/11/2025	8:30	DIS01	R.Pearson	7.07	0.27	28.2		ES2534666	6.78	28	<100	
5/11/2025	9:30	DIS02	R.Pearson	7.17	0.22	27.7		ES2534666	7.2	42	<100	
10/11/2025	14:00	DIS01	A.Niddrie	6.8	0.07	27.3		ES2535276	6.71	6	<100	
10/11/2025	14:05	DIS02	A.Niddrie	6.9	0.05	32		ES2535276	6.78	<5	<100	
17/11/2025	11:45	DIS01	A.Niddrie	7.13	0.1	28.2		ES2536235	7.27	12	<100	
17/11/2025	11:45	DIS02	A.Niddrie	7.39	0.11	29.2		ES2536235	6.69	<5	<100	
17/11/2025	12:50	Tank 9	A.Niddrie	7.75	0.7	28.4		ES2536234	7.22	<5	<100	Observation: No sheen observed; 27 cm of water present in bund. (NOTE this sample was taken outside of the regular sampling procedure as part of the OWS investigation on 17-11-2025)
21/11/2025	8:00	DIS01	A.Hill	7.25	0.27	29.3		ES2537028	7.1	<5	<100	
21/11/2025	8:05	DIS02	A.Hill	7.15	0.31	29.7		ES2537028	7.02	<5	<100	

C.2 Groundwater and Surface Water Monitoring

Four groundwater/surface water monitoring events were completed during the reporting period. Three of these events were prior to site operations (these were included in the baseline reporting), and one occurred following the first fuelling event. The conclusions from these monitoring events are highlighted in Section C.2.1 and Section C.2.2. The data collected during the reporting period is displayed in Table C-2 and Table C-3.

C.2.1 Baseline Monitoring (Pre-operations Environmental Investigation)

The monitoring events that occurred in November/ December 2024, March 2025 and July 2025 were included in the Pre-operations Environmental Investigation (Jacobs, 2025c). Table C 2 summarises the conclusions made from the investigation.

Table C 2 Pre-operations Environmental Investigation Conclusions

Conclusions	
Groundwater	- Groundwater quality was generally consistent across site, except for MW05. Water quality at MW05 is notably different to other locations, with acidic water and higher concentrations of metals reported compared to other locations. The cause of lower pH at this location was not identified but was concluded not to be attributable to construction activities. - Average nutrient concentrations including ammonia nitrogen, total phosphorous, total nitrogen and dissolved reactive phosphorous are above the adopted guideline values. These nutrient detections are believed to be indicative of natural occurring concentrations. - Average copper concentrations across the site are above the adopted guideline value. This is representative of pre-existing site conditions which are consistent with the neighbouring Vopak site. - Notable concentrations of several PFAS compounds (mainly 6:2 FTS) were recorded in MW01. It is believed that this is a result of an incident that occurred at the neighbouring Vopak site (JBS&G, 2022), leading to PFAS contaminated groundwater and surface water migrating across the boundary. No exceedances of the adopted criteria were noted.
Surface Water	- Average nutrient concentrations including ammonia nitrogen, total nitrogen and total phosphorous are above the adopted guideline values. In general, algal growth was identified at monitoring locations, this indicates natural organic material such as leaf litter or debris is washing into the drains and undergoing decomposition, likely resulting in the elevated nutrient concentrations. - Average zinc concentrations were reported above the adopted guideline value. There were also several copper exceedances recorded across the site. These exceedances are consistent with those of the neighbouring Vopak site (JBS&G, 2022). - PFAS concentrations were reported at several locations across the site. It is understood that the PFAS is migrating to the site from the adjacent Vopak site (JBS&G, 2022).
Stormwater Discharge	- The stormwater sampled on average had a pH inside the adopted guideline range. pH was regularly recorded below the guideline range. - One exceedance of TSS was recorded at DIS01, however there was no exceedance of TSS at DIS02. This suggests the HumeCeptor at DIS02 is effectively removing TSS from stormwater. - There were no exceedances of hydrocarbons recorded in the stormwater.

C.2.2 Quarterly Groundwater and Surface Water monitoring

The monitoring event that occurred in October/ November 2025 was part of the quarterly groundwater and surface water monitoring as required by EP2021/008 – 002. Table C 3 summaries the conclusions were made from the monitoring event.

Table C 3 Quarterly Groundwater and Surface Water Monitoring Conclusions

Conclusions	
Groundwater	General groundwater quality is reflective of the natural background conditions. Several nutrient concentrations including ammonia nitrogen, total phosphorous, total nitrogen and reactive phosphorous are above the adopted water quality objectives. These nutrient detections are in

Conclusions	
	line with those reported in the Pre-Operations Report and are believed to be indicative of natural occurring concentrations. ▪ E. coli and Enterococci were detected above the limit of reporting (LOR) at several locations (and exceeded water quality objective at two locations). There is no known on site source for microbiological contamination (no septic tanks/ sewerage lines in the proximity of the wells), however frogs have been noted living in the gatic/stick up well casings. It is possible cross-contamination from frog faeces has resulted in the elevated concentrations; however, it is unlikely due to the sites operations. ▪ Copper concentrations detected above the adopted water quality objectives are in line with historic sampling and are likely due to background conditions. Elevated levels of cadmium, copper, lead, nickel and zinc detected at MW05 are likely due to the acidic conditions at this location and are not attributable to operational activities. Hydrocarbons were not detected, suggesting no fuel leaks/spills have occurred/breached containment from the site. ▪ PFAS in groundwater did not exceed the adopted water quality objectives, but elevated concentrations were noted. It is understood that this contamination is not due to site activities.
Surface water	▪ Nutrient concentrations (including ammonia nitrogen, total nitrogen and total phosphorus) were reported above the adopted water quality objectives. In general, algal growth was identified at monitoring locations, this indicates natural organic material such as leaf litter or debris is washing into the drains and undergoing decomposition, likely resulting in the elevated nutrient concentrations. ▪ E. coli and Enterococci were detected above LOR at all locations. There is no known on site source for microbiological contamination on site. The detection of the contamination at all the sampling locations suggests that it is present in the environment around the site and is not originating from site. ▪ Zinc concentrations were reported above the water quality objective at every location. There were also several copper exceedances recorded. This is in line with historical monitoring and is likely representative of background conditions.

C.3 Site Inspections

Post initial site commissioning Crowley commenced their inspection program. This included daily, weekly and monthly inspections. Table C4 outlines the environmental inspections undertaken during this reporting period.

Table C 4 Site Inspections

Inspection Type	Performing Entity	Inspection Date	Corrective Actions	Status of Corrective Actions
Weekly Environmental Site Inspection	Jacobs	13/10/25	Yes	Closed – Updated hazard signage around site.
Weekly Environmental Site Inspection	Jacobs	20/10/25	Yes	Closed – Missing SDS in storage container.
Weekly Environmental Site Inspection	Jacobs	27/10/25	Yes	Closed – Improve cable management.
Weekly Environmental Site Inspection	Jacobs	3/11/25	No	NA
Weekly Environmental Site Inspection	Jacobs	10/11/25	Yes	Closed – Unlabelled chemicals in storage.
Weekly Environmental Site Inspection	Jacobs	17/11/25	Yes	Closed – Marine boom in northern drain dislodged during rain event.
Weekly Environmental Site Inspection	Jacobs	24/11/25	Yes	Closed – Potentially flammable waste being put in the wrong bins.