

# **Clyde Terminal**

# Annual Environmental Performance Review

Reporting Period: 01 January to 31 December 2023

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# **1** Introduction

Viva Energy Australia Pty Ltd (Viva Energy) operate the Clyde Terminal, which receives, stores, doses and distributes finished petroleum products.

Following the closure of the Clyde Refinery in late 2012 and the cessation of refining activities, Viva Energy proposed to undertake the following works at the terminal:

- Demolition works The removal of redundant refinery processing units, tanks and other infrastructure;
- Construction works The carrying out of works including excavation, upgrades to tanks, bunds, drainage and
  instrumentation, replacement of electrical substations, upgrades to the fire water system and revised pumping
  and piping works; and,
- **Operation** The operation of the site as a bulk fuel storage facility.

The main objectives of the conversion project were:

- To improve the efficiency of the Clyde Terminal by upgrading existing facilities and structures; and,
- To improve environmental and safety performance of the Clyde Terminal while continuing to operate as a viable and efficient finished petroleum product receipt, storage and distribution terminal.

On 14 January 2015, the Planning Assessment Commission of NSW (as delegate of the Minister for Planning) granted Development Consent (SSD 5147) for the project subject to a number of conditions. The Clyde Terminal currently receives finished petroleum products from Viva Energy's Gore Bay Port Facility. These products are distributed by pipeline from the Clyde Terminal to the adjacent Parramatta Terminal road gantry and to Sydney Airport.

A large part of the former Refinery land in the south-western part of the Clyde Terminal is considered surplus to the Terminal's operational requirements and is currently subject to remediation activities. This area is known as the Western Area (Figure 1) and will be remediated to a standard suitable for future commercial/industrial land uses. The Western Area Remediation Project (WARP) was designated state significant development due to the scale of the proposed works and an Environmental Impact Statement (EIS) was prepared. On 7 May 2020, The Minister for Planning and Places approved the development application (SSD 9302) for the Clyde WARP.

The Clyde Terminal site and the Western Area are shown in Figure 1 below.

The content of this Annual Review meets the requirements of SSD 5147 condition D4. Table 1 below lists the requirements and the corresponding sections where each specific requirement is addressed.

#### Table 1: Annual review reporting requirements

Condition D4 requirement	AEPR Section
By the end of July each year, or other timing as may be agreed by the Secretary, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review must:	
(a) describe the construction and demolition activities that were carried out in the previous calendar year, and the construction and demolition activities proposed to be carried out in the coming calendar year;	Section 3
<ul> <li>(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous calendar year, which includes a comparison of these results against:</li> <li>the relevant statutory requirements, limits or performance measures/criteria;</li> <li>the monitoring results of previous years; and</li> <li>the relevant predictions in the EIS;</li> </ul>	Section 4
(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;	Sections 5
(d) identify any trends in the monitoring data over the life of the Development;	Section 4
(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and	Section 4
(f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the Development.	Section 10



#### FIGURE 2-1 SITE FEATURES

#### KEY

C	Site boundary
	Project Area boundary
	Western Area boundary
C	Suburb boundaries
C	Lot boundaries
-	- State road
	Local road

Figure 1 – Clyde Terminal and Western Area

Note: Project Area boundary along the southern border is indicative only and will be refined during detailed design to exclude the tree management zone.





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# 2 Approvals

Viva Energy (formerly The Shell Company of Australia Limited) holds two statutory approvals for Clyde Terminal, namely:

- SSD 5147, issued on 14 January 2015 by the Planning Assessment Commission of NSW (as delegate of the Minister for Planning) for the "Conversion of the existing Shell Clyde Refinery to a finished petroleum products import, storage and distribution terminal including demolition of the redundant infrastructure".
  - On 29 July 2019, the Industry Assessments Director (as delegate of the Minister for Planning and Public Spaces) approved a Modification of Development Consent (SSD 5147 MOD 1) to allow for one year extension on construction period; six additional assets to be demolished; the retention of two storage tanks initially nominated for demolition; and, general updates of the development consent.
- EPBC 2013/6878, issued on 17 April 2014 by the Department of Environment for the Shell Clyde Terminal Expansion "to undertake physical modifications at the existing Shell Clyde Terminal, Rosehill, NSW in accordance with the EPBC Act referral 2013/6878". This approval has effect until 31 December 2064.

In addition, continued terminal operations are also subject to the conditions and requirements under:

- Environment Protection Licence (EPL) No. 570 under the Protection of Environment Operations Act 1997 (POEO Act).
- Major Hazards Facility (MHF) Licence (licence no. 20-35-81, expiry 15 Jan 2028) under the Work Health and Safety Act 2011 (WH&S Act)

# 3 Development activities

This Section describes the works undertaken in accordance with Development Consent SSD 5147 during the reporting period (1 January to 31 December 2023).

### 3.1 Works undertaken during this reporting period

#### 3.1.1 Demolition works

With the exception of Tank T52, all demolition works approved by SSD-5147 and SSD-5147 MOD 1 had been completed at the time of writing this report.

### 3.1.2 Construction works

No construction works were executed during the reporting period. Construction consent expired on 14 January 2020 in accordance with Condition B6 of the SSD 5147 MOD 1.

### 3.1.3 Operations

Operations at Clyde Terminal continued 24 hours, Monday to Sunday, during this reporting period in accordance with condition C22 of the SSD 5147.

The Clyde Terminal continued receiving finished petroleum products from the Gore Bay pipeline. Products were stored in compliance with the limits prescribed in condition B5 of the SSD 5147 (refer to Table 2 below). Products were distributed by pipeline from the Clyde Terminal to the adjacent Parramatta Terminal road gantry and to Sydney Airport.

#### Table 2: Operations summary

Product	Approved limit	Previous reporting period (actual)	This reporting period (actual)	Next reporting period (forecast)
Finished petroleum products (ML)	264	186	181	200
Petroleum gases (m <sup>3</sup> )	1,550	0	0	0

# 3.2 Proposed works for the next reporting period

### 3.2.1 Demolition works

Tank T52 is the remaining item of infrastructure approved for demolition in SSD-5147 and SSD-5147 MOD 1. The removal of residues from T52 is planned for completion in 2024 in preparation for its demolition.

#### **3.2.2 Construction works**

All construction works approved by SSD-5147 and SSD-5147 MOD 1 had been completed at the time of writing this report and the construction consent has lapsed in accordance with Condition B6 of the SSD 5147 MOD 1.

There are no additional works proposed for next year.

#### 3.2.3 Operations

Operational activities during the next reporting period will be consistent with those described on section 3.1.3 above.

# 4 Environmental performance

### 4.1 Noise

During the reporting period, noise at Clyde was managed in accordance with the Environmental Management Manual (EMM) and the operating conditions listed in C24 of the SSD 5147.

No noise complaints were received during this reporting period. Therefore, noise monitoring at the sensitive receivers was not triggered or required.

The above-described performance is consistent with results from previous years.

### 4.2 Air

During the reporting period, air emissions were managed in accordance with the EMM and the approved Operational Air Quality Monitoring Program (OAQMP) under condition C30 of the SSD 5147. During the reporting period, visual monitoring for dust was undertaken during routine site activities. No observations of dusty conditions were recorded. No air quality complaints were received during this or previous reporting periods.

The OAQMP is present on the Viva Energy website in accordance with condition D9.

Low levels of odour were observed and recorded during regular site surveillance. Potential for odour generation during regular activities was also assessed routine Job Start meetings. Potential for odour generation during non-routine activities were assessed and managed in accordance with Viva Energy's Permit to Work system. No offensive odours were identified in these assessments, consistent with results from the previous reporting period.

Emissions from the storage tanks are estimated using the techniques in line with the National Pollutant Inventory (NPI) reporting process and reported as part of the annual NPI submission and the NSW EPA Annual Return required under EPL 570 for the period 02 July to 01 July. The assessment of annual air emissions for 2022/2023 was calculated to be 268kg of Benzene and 50,554kg of Volatile Organic Compounds (VOC's) discharged to air, well below the EPL load limits of 26,000kg and 1,250,000kg, respectively. The 2023/2024 annual emissions will be calculated and reported to the NSW EPA by 30 August 2024.

### 4.3 Soil and water

The soil and water management measures for Operations are detailed in the EMM. During this reporting period, monitoring and maintenance of drains was undertaken on a routine basis.

Monitoring of surface water discharge was conducted in accordance with the EPL requirements (refer to Appendix A.2). The main discharge point for site stormwater to Duck River is identified as EPA ID No.1 (Refer to Figure 3). This point was monitored monthly during the reporting period with pollutant concentrations well below the EPL limits as detailed in summary Table 3 below. Results are comparable to those presented in the previous reporting period.

The average daily discharge flow at this point was 709 kL/day, with a maximum daily discharge volume recorded of 1,085 kL. The EPL volume limit at this discharge point is 4,000 kL/day. Water was not discharged from the other approved discharge points (EPA ID No. 2, 4 or 30).

Pollutant	Co	oncentration lim	Мс	nitoring resu	llts	
	50 percentile	90 percentile	100 percentile	min	ave	max
BOD (mg/L)	45	95	n/a	<5	<5	10
Fluoride (mg/L)	25	40	n/a	0.23	0.70	1.2
Nitrogen (Ammonia)	6	30	n/a	<0.01	0.07	0.38
Oil and Grease (mg/L)	8	10	n/a	<5	<5	6
ph			6.0-9.0	6.8	7.2	7.6
Phenols (mg/L)			0.5	<0.05	<0.05	<0.05
Total Nitrogen (mg/L)	35	100	n/a	0.47	0.99	1.3
Total Phosphorus (mg/L)	1.5	6	n/a	0.08	0.15	0.30
TSS (mg/L)	30	60	n/a	<5	7.5	18

#### Table 3: Summary of monitoring results for the main discharge point at Clyde Terminal (EPA ID No.1)

Water discharge through approved flexible discharge points did not occur during the reporting period. Accordingly, no sampling was undertaken at these discharge points.

Overflow events were recorded for the East Interceptors bays during the months of January, February and April due to heavy rainfall events.

Samples were taken daily during overflow conditions for the East Interceptors. Summary results for the overflow discharge at the East Interceptors are presented in Table 4 below.

Table 4: Summa	ry of monitoring	results for overflow	discharge to wate	r (EPA ID No.28 a	and 29)
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Pollutant	Concentration limits	Monitoring results							
	No concentration limits	EPA ID No.28		EPA ID No.29					
		min	ave	max	min	ave	max		
рН	n/a	7.5	7.7	7.9	7.3	7.6	7.8		
Total Organic Carbon (mg/L)	n/a	2.0	2.5	3.1	3.7	4.2	4.6		
Total Suspended Solids (mg/L) n/a		<5	<5	9	10	13	17		



Figure 3 – Clyde Terminal licensed discharge points

### 4.4 Groundwater

Groundwater monitoring was undertaken by Environmental Resources Management Pty Ltd (ERM) on the Clyde Terminal and the Clyde Western Area in November 2023. This monitoring was undertaken in accordance with the requirements of the EMM and the Site's Environment Protection Licence (EPL570).

These results were documented in the following reports:

- "Clyde Terminal Quarter 4 (2023) Groundwater Monitoring Report", prepared by ERM and dated 05 July 2024; and,
- "Clyde Terminal Annual Progress Report (2023), prepared by ERM and dated 28 March 2024

Groundwater results are considered to be generally consistent with previous years and the following was noted by ERM regarding groundwater conditions;

- The direction of groundwater flow is generally consistent with previous GMEs undertaken and flows to the southeast and east towards the bounding Duck River north-east towards the Parramatta River within northern sections of Clyde and Parramatta Terminal. Some localised variations in groundwater flows are noted due localised mounding and the presence of subsurface infrastructure;
- The nature and extent of LNAPL and dissolved phase hydrocarbon impacts are currently considered to be stable, well characterised in the context of the current land use and the monitoring well network is considered suitable to assess potential changes in environmental conditions from Terminal Operations, as well as known residual impacts;
- Dissolved-phase groundwater concentrations of petroleum hydrocarbon Contaminants of Potential Concern (COPC), including BTEXN and TRH C<sub>6</sub>-C<sub>40</sub> Fractions do not indicate the occurrence of previously undetected release events from Terminal Site Operations.
- Stability of groundwater conditions is evident based on no statistically significant increasing concentrations trends of petroleum hydrocarbon COPCs and the detection of petroleum hydrocarbon concentrations being limited to known localised on-site areas of LNAPL in the sub-surface.

The Conceptual Site Model, including Potential Source-Pathway Receptor Linkages in relation to groundwater remains consistent with previous assessments:

- On-site concentrations of petroleum hydrocarbon COPCs exceeding offsite ecological or recreational criteria were delineated to on-site areas;
- Exceedances of ecological criteria for chromium were noted in monitoring wells within the former Suez Leased Area and the Northern Wetlands; however, exceedances have been delineated to on-site areas.
- Potential for risks to on-Site workers conducting excavation within the above areas are currently mitigated via Viva Energy's Permit to Work system, which manages exposure risk via mandatory review of environmental data and implementation of controls prior to any excavation at the Site;

Appendix A3 presents a summary of the groundwater results for BTEXN and TRH C10-C36 at the Clyde Terminal.

Groundwater monitoring will continue in 2024 in accordance with the developed groundwater sampling and analysis plan that is presented in the Annual Progress Report detailed above.

# 4.5 **Biodiversity**

On 02 April 2019, DoEE granted approval to the Revised Plan of Management: Restoration of Green and Golden Bell Frog Habitat, Clyde Terminal, January 2019. The alternate design included a wetland mosaic adjacent to the main wetlands to provide additional breeding habitat to compensate for areas of habitate identified as lost from the previously approved Conservation of Green and Golden Bell Frogs, Shell Site, Clyde, 2013. The approved alternate design also aimed to preserve more of the existing wetland for the benefit of the balance of flora and fauna species in the area whilst meeting the breeding and sustainable habitat aims of the original Plan of Management.

In 2019, the proposed wetland mosaic and dispersal corridor were constructed. These works included the installation of a frog-proof fence along the wetland mosaic and main wetland to help contain the Green and Golden Bell Frog within their improved habitat and exclude them from operational areas.

Wetland maintenance activities have continued throughout the reporting period.

### 4.6 Waste

Wastes were managed in accordance with the EMM.

During the reporting period, operational activities at the Clyde Terminal generated approximately 2,212 tonnes of solid and liquid wastes, which was a notable increase from the previous year's result of 1,498 tonnes. The additional waste volume was due to the decommissioning and cleaning of the sites Biotreater water treatment system and the majority of this waste was subject to chemical or physical treatment prior to disposal (91%).

1% of all waste generated was recycled and 8% was sent directly to landfill. The proportion of waste sent to landfill increased from 6.6% compared to the previous reporting period.

No asbestos were generated during the reporting period.

# 5 Incidents and non-compliances during the reporting period

No reportable incidents occurred during the reporting period.

No non-compliance with EPL570 conditions occurred during the reporting period.

# 6 Actions required from previous Annual Review

The Clyde Terminal environmental performance for the reporting period has been in line with the statutory requirements and limits, as described in Section 4 above.

No actions were identfied in the previous Annual Review.

# 7 Measures to improve the environmental performance

Table 5 includes a list of measures to improve the environmental performance as well as an action plan for completion. Listed actions were identified during the Independent Environmental Audit undertaken in March 2022 and were reported in the 2021 and 2022 AEPR. The table has been updated to provide an update on progress of the action plan.

In accordance with consent condition D7, in 2025 Viva Energy will commission and participate in another independent audit which will evaluate the level of compliance of all conditions of SSD5147 as well as EPL570.

In August 2022, Viva Energy provided the NSW EPA with a "PFAS Firefighting Foam Transition Plan" for its NSW terminal operations, including the Clyde Terminal. The transition plan provides details of a number of actions till December 2025 that Viva Energy propose to undertake to meet or exceed compliance with the Protection of the Environment Operations (General) Amendment (PFAS Firefighting Foam) Regulation 2021 (the Regulation).

Some of the actions include;

- Decommission non-compliant foams and dispose at a suitable licensed facility.
- Replace identified non-compliant foam stocks with fresh C6 compliant foam for Tankfarm fire protection
- Review the suitability of foams for specific fire scenarios and replace with Fluorine Free Foams.

Viva Energy continue to implement this transition plan and provide regular updates to NSW EPA on progress against the actions detailed in the plan.

### Table 5: List of measures to improve environmental performance

MYOSH reference number	Recommended Action	Viva Energy proposed action	Responsible party	Initially proposed completion date	Status at 28/07/2023	Updated status (8/07/2024)
21263	The current EMM includes cross- references to the consent conditions and the conditions from "Licence 570 23 Dec 2021". The EMM should be periodically reviewed and updated to ensure it addresses all relevant conditions from the development consent and the current EPL. For example, the EMM should be amended to fully address CC # C50 as it applies to the operations phase of the EST.	Update EMM to include cross-reference to CC # C50 and to address all of the requirements, including C50(d) Groundwater; and, C50(e) Leachate	Environment Lead	30/09/2022	A Licence variation application for EPL570 was submitted to NSW EPA on 30 June 2023. Once the EPL variation is issued, the EMM will be updated to reflect the updated EPL. The relevant EMM section will also be updated to reflect the requirements of condition C50 (as it applies to the operational phase of the project) during this update. It is proposed that the EMM will be updated and made available on the Viva Energy website no later than 30 Sept 2023.	<b>Completed</b> EPL570 variation was published by NSW EPA on 22 August 2023. The EMM was revised to reflect the updated EPL and the requirements of condition C50. The revised EMM is dated <b>1 September 2023</b> . The revised EMM was made available on the Viva Energy website from 24 October 2023.
N/A	The EPL does not appear to currently permit the generation, storage or disposal of PFAS wastes. Viva Energy should consult with the EPA to determine how the EPL should be amended to address any potential future wastes of this type at the terminal.	Include generation, storage and disposal of PFAS firefighting foams on Application for Exemption for the continued use of long chain PFAS	HSSE Lead	31/08/2022	The waste code M250 is listed in EPL condition L5.3 which is "Surface active agents (surfactants), containing principally organic constituents and which may contain metals and inorganic materials". While it is considered that this code would encompass PFAS, Viva Energy have consulted with the EPA on this matter and are waiting for their response.	<b>Completed</b> NSW EPA considered this condition to be not relevant to the site operations and removed the condition from the the updated EPL
21264	If the Biotreater is decommissioned, then Viva Energy should consult with the EPA to determine if EPL # L5.9 can be removed from the EPL.	Apply for a license variation for the removal of the biotreater	Environment Lead	15/12/2022	A Licence variation application for EPL570 was submitted to NSW EPA on 30 June 2023. Removal of EPL condition L5.9 has been requested.	<b>Completed</b> NSW EPA removed this condition from the updated EPL.

MYOSH reference number	Recommended Action	Viva Energy proposed action	Responsible party	Initially proposed completion date	Status at 28/07/2023	Updated status (8/07/2024)
N/A	Viva Energy should consult with the EPA to determine if EPL #L5.6 can be removed from the EPL.	To be considered as part of 21264	Environment Lead	15/12/2022	A Licence variation application for EPL570 was submitted to NSW EPA on 30 June 2023. Removal of EPL condition L5.6 has been requested.	<b>Completed</b> NSW EPA removed this condition from the updated EPL.
N/A	Viva Energy should consult with the EPA to determine if EPL # L5.8 can be removed from the EPL.	To be considered as part of 21264	Environment Lead	15/12/2022	A Licence variation application for EPL570 was submitted to NSW EPA on 30 June 2023. Removal of EPL condition L5.8 has been requested.	<b>Completed</b> NSW EPA removed this condition from the updated EPL.
N/A	If the Biotreater is decommissioned, then Viva Energy should consult with the EPA to determine if EPL # L8.1 can be removed from the EPL.	To be considered as part of 21264	Environment Lead	15/12/2022	A Licence variation application for EPL570 was submitted to NSW EPA on 30 June 2023. Removal of EPL condition L8.1 has been requested.	<b>Completed</b> NSW EPA removed this condition from the updated EPL.
21265	It was observed that there are some gaps around the gate to the frog habitat area. These gaps should be closed off to isolate the frog habitat from the terminal area.	Close gaps around the gate to the frog habitat area	Operations and Maintenance Coordinator	30/10/2022	Completed by proposed due date	<b>Previously completed.</b> No further actions required.
N/A	The degraded sand / gravel bags observed along some of the surface drains should be replaced (or removed if no longer required).	Sand/gravel bags will be assessed and replaced when necessary	Operations and Maintenance Coordinator	Ongoing	Condition of sand/gravel bags has been assessed as acceptable and no action is currently proposed.	<b>Previously actioned.</b> No further actions required.

# Appendix A

- A.1 2022 Annual Environmental Performance Report DPE review letter dated 17 August 2023
- A.2 Surface water discharge monitoring results
- A.3 Summary of Clyde Terminal Groundwater Conditions (Q4 2023)

# A.1 2022 Annual Environmental Performance Report – DPE review letter



Department of Planning and Environment

Ms Erica Salazar Zarate Viva Energy Australia Ltd Gate 3 Durham St Rosehill, New South Wales, 2142

17/08/2023

Dear Ms Salazar Zarate

#### Clyde Refinery Conversion - SSD-5147 Annual Environmental Performance Report 2022

I refer to the Annual Environmental Performance Report (**AEPR**) for the period 1 January 2022 to 31 December 2022, as required under Schedule D condition D4 of Clyde Refinery Conversion SSD-5147, as modified (the **Consent**) and submitted to the Department of Planning and Environment (the **department**) on 31 July 2023.

The department has reviewed the AEPR and considers it to generally satisfy the reporting requirements of the Consent. Please note that the department's acceptance of this AEPR is not an endorsement of the compliance status of the project.

However, for future AEPRs, please include a Compliance Table that is prepared in accordance with the *Compliance Reporting Post Approval Requirements* (**CRPAR**) (department, 2020). The Compliance Table should include the compliance status, the methodology and evidence relied upon for every relevant condition within the Consent. Please refer to Section 3.1.6 and Appendix C of the CRPAR for details on the Compliance Table. You can find the CRPAR here:

https://www.planning.nsw.gov.au/sites/default/files/2023-02/compliance-reporting-par-201806.pdf

Please make publicly available a copy of the AEPR on the company website.

Should you wish to discuss the matter further, please contact Astrid Christensen, Compliance Officer, on (02) 9274 6170 or email <u>compliance@planning.nsw.gov.au</u>

Yours sincerely

mtumm

Astrid Christensen Compliance Officer - Metro Compliance

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150 | Locked Bag 5022, Parramatta NSW 2124 | dpie.nsw .gov.au | 1

EPA ID No.1 – Main discharge outlet													
Pollutant	Biochemical Oxygen Demand (BOD)	Fluoride	Nitrogen (Ammonia)	Oil and Grease	рН	Phenols	Total Nitrogen	Total	Petroleun	n Hydroca	arbons	Total Phosphorus	Total Suspended Solids
Licence Limit	45/95 (50%/90%)	25/40 (50%/90%)	6/30 (50%/90%)	8/10 (50%/90%)	6-9	0.5	35/100 (50%/90%)	C6-C9	C10-C14	C15-C28	C29-C36	1.5/6 (50%/90%)	30/60 (50%/90%)
Units of Measure	mg/L	mg/L	mg/L	mg/L	units	mg/L	mg/L		m	g/L		mg/L	mg/L
Freq. as per EPL	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly				Monthly	Monthly
05/01/2023	<5	1.2	0.38	<5	7.3	<0.05	1.1	<0.04	<0.05	<0.2	<0.2	0.30	5
02/02/2023	<5	0.61	0.02	6	7.0	<0.05	0.95	<0.04	0.18	0.47	<0.2	0.18	11
02/03/2023	<5	0.65	0.04	<5	7.1	<0.05	1.0	<0.04	0.47	0.53	<0.2	0.25	9
04/04/2023	7	0.92	0.07	<5	7.0	<0.05	1.3	0.15	0.62	<0.2	<0.2	0.22	12
04/05/2023	<5	0.66	<0.01	<5	7.5	<0.05	0.47	<4	0.43	0.78	<0.2	0.09	<5
01/06/2023	<5	0.81	0.05	<5	7.3	<0.05	0.61	<0.04	<0.05	<0.2	<0.2	0.08	<5
04/07/2023	<5	1.0	0.03	<5	7.6	<0.05	0.65	<0.04	0.19	0.75	<0.2	0.08	<5
01/08/2023	<5	0.36	0.04	<5	7.0	<0.05	1.2	<0.04	<0.05	<0.2	<0.2	0.08	<5
06/09/2023	<5	0.74	0.05	<5	7.2	<0.05	1.3	<0.04	0.10	0.25	<0.2	0.08	<5
03/10/2023	<5	0.23	<0.01	<5	7.0	<0.05	0.98	<0.04	0.14	0.58	<0.2	0.13	12
07/11/2023	10	0.71	<0.01	<5	7.1	<0.05	1.3	0.3	0.57	0.67	<0.2	0.16	18
05/12/2023	<5	0.53	0.12	<5	6.8	<0.05	1.0	0.082	0.054	<0.2	<0.2	0.13	11

# A.2 Surface water discharge monitoring results

EPA ID No.2 – Main Interceptor Pumpout									
Pollutant pH Phenols		Phenols	Total Organic Carbon	Total Suspended Solids					
Licence Limit	6.0-9.0 0.5		100	50					
Units of Measure	units	mg/L	mg/L	mg/L					
Frequency as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging					
January 2023			No discharge						
February 2023			No discharge						
March 2023			No discharge						
April 2023			No discharge						
May 2023			No discharge						
June 2023			No discharge						
July 2023			No discharge						
August 2023			No discharge						
September 2023	No discharge								
October 2023	No discharge								
November 2023	No discharge								
December 2023	No discharge								

EPA ID No. 4 - B2 System Pump out										
Pollutant	pH Phenols Total Organic Carbon				Total Petroleum Hydrocarbons					
Licence Limit	6.0-9.0 0.5 100 50 n/a									
Units of Measure	units	mg/L	mg/L	mg/L	mg/L					
Frequency as per EPL	PL Daily when discharging Daily when discharging Daily when discharging Charging Daily when discharging			Daily when discharging	Daily when discharging					
January 2023				No discharge						
February 2023				No discharge						
March 2023				No discharge						
April 2023				No discharge						
May 2023				No discharge						
June 2023				No discharge						
July 2023				No discharge						
August 2023				No discharge						
September 2023				No discharge						
October 2023				No discharge						
November 2023	3 No discharge									
December 2023				No discharge						

EPA ID No.25 – Flexible discharge outlet				
Pollutant	рН	Total Organic Carbon	Total Suspended Solids	
Licence Limit	6.0-9.0	100	50	
Units of Measure	units	mg/L	mg/L	
Frequency as per EPL	<5 days prior to discharge	<5 days prior to discharge	<5 days prior to discharge	
January 2023	No discharge			
February 2023	No discharge			
March 2023	No discharge			
April 2023	No discharge			
May 2023	No discharge			
June 2023	No discharge			
July 2023	No discharge			
August 2023	No discharge			
September 2023	No discharge			
October 2023	No discharge			
November 2023	No discharge			
December 2023	No discharge			

EPA ID No. 26 - B2 System Monitoring Point								
Pollutant	рН	Phenols	Total Organic Carbon	Total Suspended Solids	Total Petroleum Hydrocarbons		i	
					C6-C9	C10-C14	C15-C28	C29-C36
Units of Measure	units	mg/L	mg/L	mg/L	mg/L			
Freq. as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging			
January 2023	No discharge							
February 2023	No discharge							
March 2023	No discharge							
April 2023	No discharge							
May 2023	No discharge							
June 2023	No discharge							
July 2023	No discharge							
August 2023	No discharge							
September 2023	No discharge							
October 2023	No discharge							
November 2023	No discharge							
December 2023	No discharge							

EPA ID No. 28 – East Interceptor Bay 1&2 overflow					
Pollutant	рН	Total Organic Carbon	Total Suspended Solids		
Licence Limit	n/a	n/a	n/a		
Units of Measure	units	mg/L	mg/L		
Frequency	Each overflow event	Each overflow event	Each overflow event		
07/01/2023	7.9	2.5	<5		
31/01/2023	7.5	2.0	9		
22/02/2023	7.5	2.3	<5		
23/02/2023	7.8	2.4	<5		
Mar 2023	No discharge				
03/04/2023	7.8	3.1	<5		
May 2023	No discharge				
Jun 2023	No discharge				
Jul 2023	No discharge				
Aug 2023	No discharge				
Sep 2023	No discharge				
Oct 2023	No discharge				
Nov 2023	No discharge				
Dec 2023	No discharge				

EPA ID No. 29 – East Interceptor Bay 3&4 overflow					
Pollutant	рН	Total Organic Carbon	Total Suspended Solids		
Licence Limit	n/a	n/a	n/a		
Units of Measure	units	mg/L	mg/L		
Frequency as per EPL	Each overflow event	Each overflow event	Each overflow event		
07/01/2023	7.7	4.5	10		
31/01/2023	7.3	3.7	16		
01/02/2023	7.3	3.9	17		
22/02/2023	7.8	3.9	16		
23/02/2023	7.6	4.6	11		
Mar 2023		No discharge			
03/04/2023	7.8	4.5	10		
May 2023	No discharge				
Jun 2023	No discharge				
Jul 2023	No discharge				
Aug 2023	No discharge				
Sep 2023	No discharge				
Oct 2023	No discharge				
Nov 2023	No discharge				
Dec 2023	No discharge				

EPA ID No.30 – East Interceptor Pump-out						
Pollutant	рН	Oil and Grease	Total Organic Carbon	Total Suspended Solids		
Licence Limit	6.0-9.0	10	100	50		
Units of Measure	units	mg/L	mg/L	mg/L		
Frequency as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging		
January 2023	No discharge					
February 2023	No discharge					
March 2023	No discharge					
April 2023			No discharge			
May 2023			No discharge	lo discharge		
June 2023	No discharge					
July 2023	No discharge					
August 2023	No discharge					
September 2023			No discharge			
October 2023			No discharge			
November 2023	No discharge					
December 2023	No discharge					

### A.3 Summary of Clyde Terminal Groundwater Conditions (Q4 2023)







Viva Energy Australia Pty Ltd ABN 46 004 610 459 Level 16, 720 Bourke Street Docklands Victoria 3008 Vivaenergy.com.au