

IXOM Bitumen Storage Tanks | Development Application STATEMENT OF ENVIRONMENTAL EFFECTS

Prepared for IXOM Bitumen Pty Ltd | 22 June 2026





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DEVELOPMENT APPLICATION | STATEMENT OF ENVIRONMENTAL EFFECTS

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22 June 2026

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DOCUMENT CONTROL

Revision	Date	Description	Prepared by	Reviewed by
0	22/06/2026	Final for lodgement	Element Environment	IXOM Bitumen Pty Ltd

ABBREVIATIONS AND ACRONYMS

Abbreviation/Acronym	Definition
ADG	Australian Dangerous Goods
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AS	Australian Standard
ASS	Acid Sulfate Soils
BC Act	NSW Biodiversity Conservation Act 2016
BC SEPP	State Environmental Planning Policy (Biodiversity and Conservation) 2021
BP	Bituminous Products Australia Pty Ltd
CBD	Central Business District
CBDP	Canterbury Bankstown Development Control Plan 2023
CBLEP	Canterbury Bankstown Local Environmental Plan 2023
CLM Act	NSW Contaminated Land Management Act 1997
CNVIA	Construction Noise and Vibration Impact Assessment
Codes SEPP	State Environmental Planning Policy (Exempt and Complying Development Codes) 2008
CSSI	Critical State significant infrastructure
DA	Development Application
DBYD	Dial Before You Dig
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
DECC	NSW Department of Environment and Climate Change
DPIE	NSW Department of Planning, Industry and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure
DNV	DNV Consulting Services
Element	Element Environment Pty Ltd
EMP	Environmental Management Plan
EPA	NSW Environment Protection Authority
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EP&A Regulation	NSW Environmental Planning and Assessment Regulation 2021
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPI	Environmental planning instrument
EPL	Environment protection licence
ESD	Ecologically sustainable development
FHA	Final Hazard Analysis
GTA	General Terms of Approval
HAZOP	Hazard and Operability Study
ICNG	Interim Construction Noise Guideline
IXOM	IXOM Bitumen Pty Ltd
kL	Kilolitre
km	Kilometre
LGA	Local Government Area
LoS	Level of Service
MNES	Matters of National Environmental Significance
NGER Act	National Greenhouse and Energy Reporting Act 2007

Abbreviation/Acronym	Definition
NML	Noise Management Level
NPW Act	NSW National Parks and Wildlife Act 1974
NSW	New South Wales
OMO	Ongoing Maintenance Order
PASSA	Preliminary Acid Sulfate Soils Assessment
PCT	Plant Community Type
PHA	Preliminary Hazard Analysis
PMST	Protected Matters Search Tool
POEO Act	NSW Protection of the Environment Operations Act 1997
RARR	Revesby Annual Return Report
RBL	Rating Background Noise Level
SEE	Statement of Environmental Effects
SEPP	State Environmental Planning Policy
SSD	State significant development
SSI	State significant infrastructure
SWL	Sound Power Level
TEC	Threatened Ecological Community
TfNSW	Transport for New South Wales
VMP	Voluntary Management Plan
VOC	Volatile Organic Compound
WAL	Water Access Licence
WARR Act	NSW Waste Avoidance and Resource Recovery Act 2001
WHSR	Work Health and Safety Regulation
WIRES	NSW Wildlife Information, Rescue and Education Service
WM Act	NSW Water Management Act 2000
WSP	Water Sharing Plan

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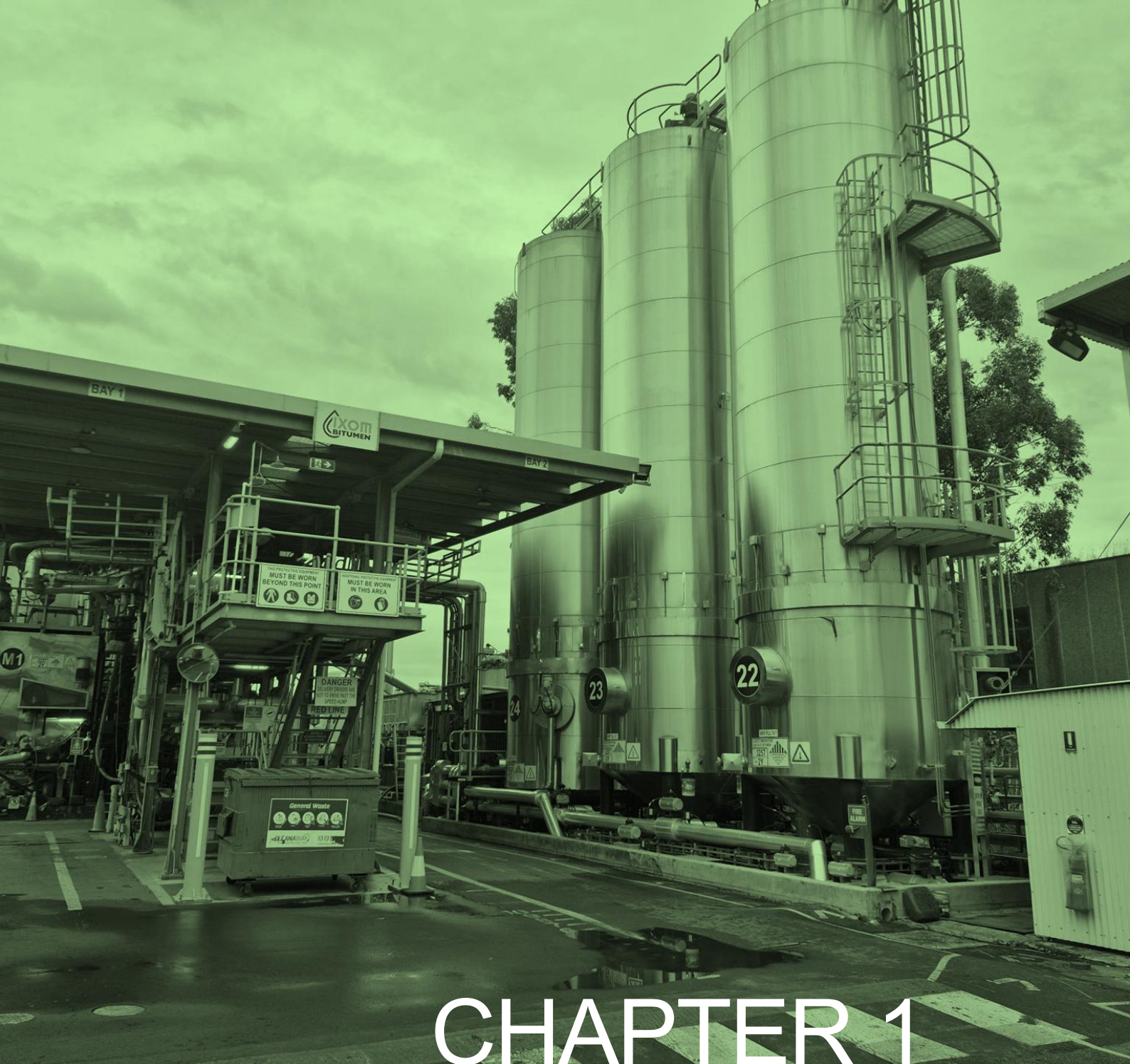
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CHAPTER 1

INTRODUCTION

1 INTRODUCTION

1.1 Background

IXOM Bitumen Pty Ltd (IXOM) owns and operates the bitumen processing facility (the facility) at 29-33 Violet Street, Revesby NSW. The facility is located approximately 3.7 kilometres (km) southwest of the Bankstown Central Business District (CBD) and is within the Canterbury Bankstown Local Government Area (LGA) (Figure 1.1).

The facility has been in operation since 1975 under a different owner, Bituminous Products Pty Ltd. The adjoining properties have been subject to multiple DAs and modifications since, with the most recent being the development of a concrete tank pad and three bitumen storage tanks at 33 Violet Street under CC-144/2018. IXOM has recently purchased the properties and is planning to implement several upgrades comprising:

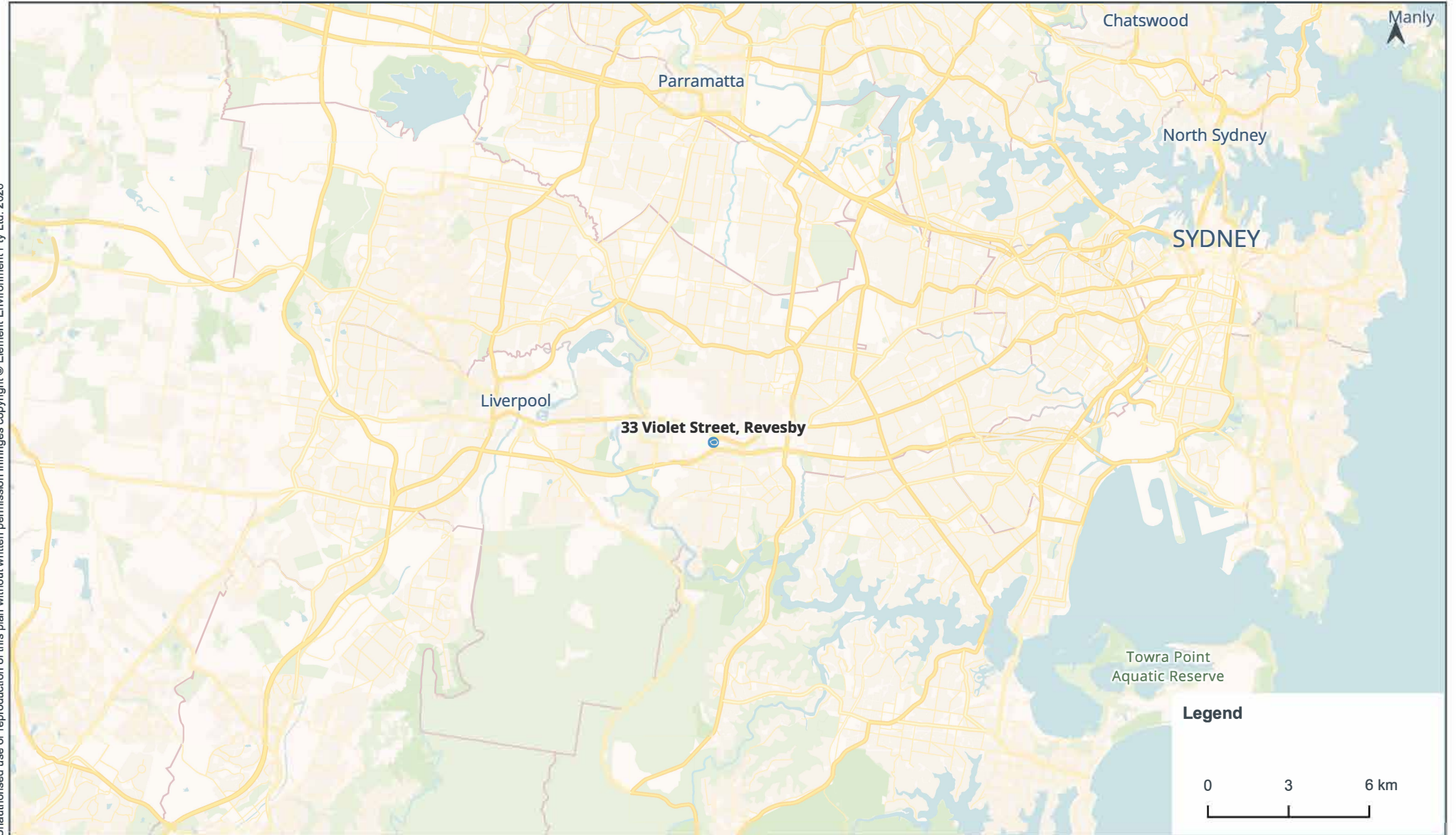
- widening of the existing site entrance driveway to improve vehicle access;
- conversion of an existing garage structure into staff amenities, including toilets;
- demolition of an existing warehouse to enable the access upgrades and reconfiguration of the site;
- installation of a truck turntable to allow vehicles to enter and exit the site in a forward direction;
- construction of a new elevated laboratory building above a light vehicle carpark within the footprint of the former warehouse; and
- installation of two 80 kilolitre (kL) bitumen storage tanks on the 33 Violet Street property ('the site').

IXOM has engaged Element Environment Pty Ltd (Element) for planning advice in relation to the proposed site upgrades. Element has identified installation of the two 80 kL bitumen storage tanks (the proposed development) as requiring a local development application (DA) with Canterbury Bankstown Council (Council) as the consent authority. All other upgrades to the facility are to be carried out as complying development under Parts 5, 5A and 7 of the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP).

Element has prepared this Statement of Environmental Effects (SEE) on behalf of IXOM to address the requirements of Section 4.15 of the EP&A Act. The SEE is to accompany the submission of the DA for the installation and use of the bitumen storage tanks only.

Figure 1.1
Regional context

IXOM Bitumen Processing Facility
Statement of Environmental Effects



1.2 The applicant

IXOM Bitumen Pty Ltd is the applicant for the proposed development, with company and contact details provided in Table 1.1.

Table 1.1: Proponent details

Item	Detail
Full name	IXOM Bitumen Pty Ltd
Proposed development contact	Danny Coughlan, Senior Project Manager
Contact number	(+61) 403 764 199
Postal address	33 Violet Street, Revesby NSW 2212
ABN	51 600 546 512

1.3 Site context

The site is at 33 Violet Street, Revesby NSW (Lot C in DP379430) within the Canterbury Bankstown LGA. Surrounding suburbs include Panania and Milperra to the west, Condell Park and Bankstown to the north, Padstow and Padstow Heights to the east and Revesby Heights and Picnic Point to the south.

The site covers an area of approximately 3,400 m² and is centred in land zoned as E4-General Industrial according to the Canterbury-Bankstown Local Environmental Plan 2023 (CBLEP). The nearest differing land zones are an RE1 – Public Recreation zone approximately 220 m to the north and an R2 – Low Density Residential zone more than 300 m to the east and south of the site (Figure 1.3).

The site is bordered by a man-made, concreted open stormwater canal to the east and south and Violet Street to the west. The stormwater canal flows to Georges River, approximately 3.5 km to the west. The site is located within low-risk flood-prone land according to the Stormwater Systems Report (SSR) provided by Council in April 2026 (Appendix D) and is impacted by the Probable Maximum Flood (PMF) event and the 1% Annual Exceedance Probability (AEP) flood event in the Milperra sub-catchment of the Georges River catchment.

The site is heavily disturbed, having been subject to general industrial activities since the late 1950s. IXOM operates an existing bitumen processing facility at the site which includes storage tanks and equipment, a warehouse and multiple ancillary buildings associated with bitumen processing. All open areas are covered with concrete hardstand surfaces. The site is accessed via a driveway from Violet Street on the western border. The existing IXOM bitumen facility also extends across the neighbouring 29 Violet Street property, where there is another existing warehouse, garage and open parking spaces, but that property is not subject of this SEE or the DA for tank installation.

The facility is licensed for scheduled activities under the Environmental Protection Licence 5267 (EPL) for petroleum products and fuel production – general (Scale: >10,000-200,000 tonnes annual production capacity). Other ancillary activities under the licence include:

- Chemical storage – chemical storage waste generation.
- Chemical storage – petroleum products storage.
- Waste storage – crumbed rubber and pre-processed waste oil.

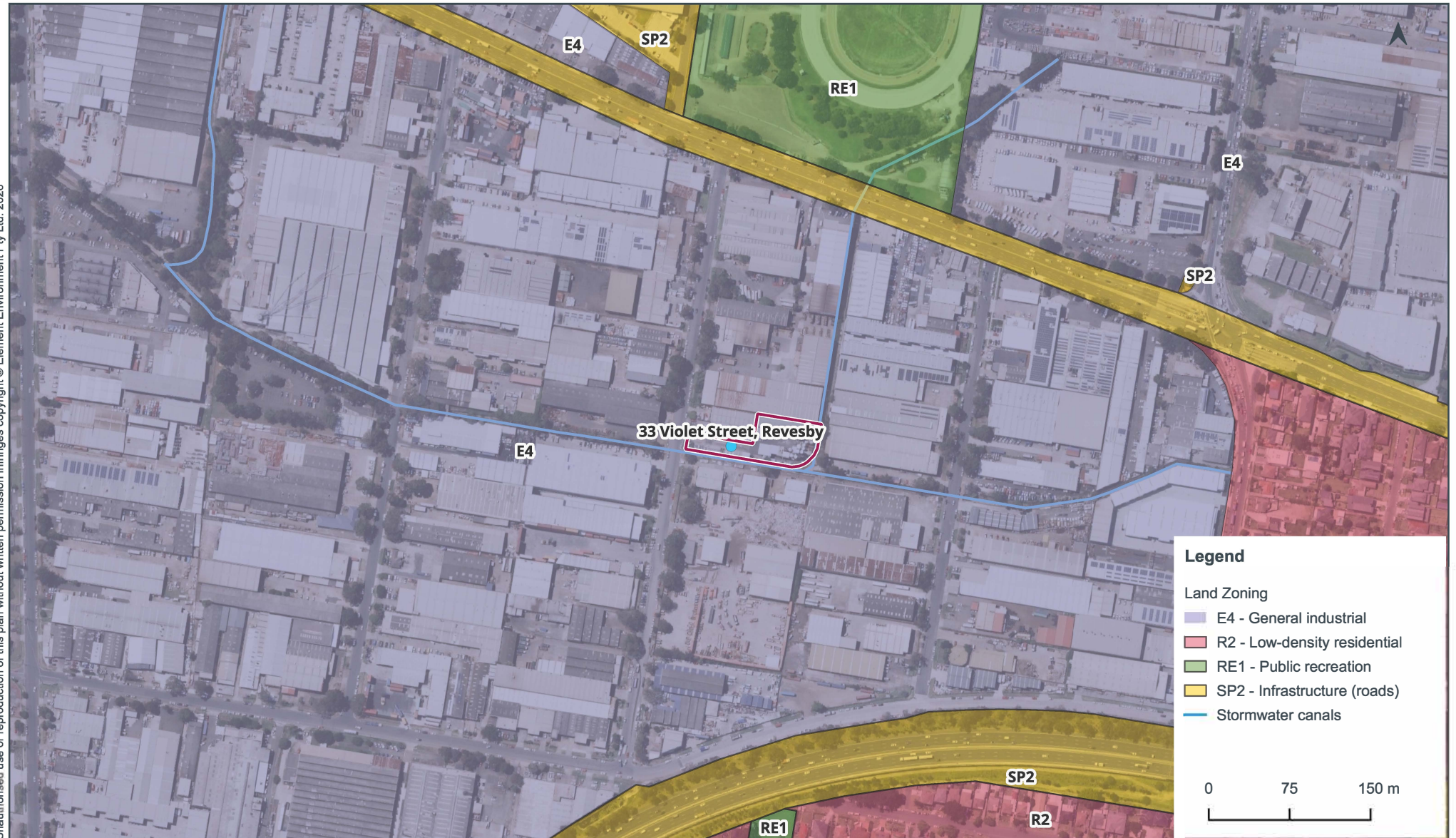
Vegetation is limited to the front setback, which includes a grassed area on the southern side of the driveway.

A title search indicates the site contains two easements, one for drainage (presumably the open canal to the south and east) and one for electricity substation purposes (in the south-west corner of the site).

Figure 1.2
Local context

IXOM Bitumen Processing Facility
Statement of Environmental Effects





1.4 Previous development applications

Table 1.2 details previous DAs, construction certificates and Old Building Applications applicable to the site, as listed on Council's DA tracker.

Table 1.2: Previous applications for the site

No	Type	Description
CC-144/2018	Construction Certificate	Construction of Concrete Tank Pad and 3 Bitumen Storage Tanks. Approved 11/04/2018
DA-615/1995/3	Development Application	Erection of a warehouse and dangerous goods store to be used in conjunction with an existing bituminous products manufacturing facility S96(2) Modification: Installation of three 80,000 litre bitumen storage tanks and one 110,000 litre oil storage tank. Approved 02/11/2017
DA-615/1995/2	Development Application	Erection of Warehouse and Dangerous Goods Store to be Used in Conjunction with an Existing Bituminous Products Manufacturing Facility - S96(2) Approved Delegated 16/02/2007
DA-829/2003	Development Application	Energy Australia Substation (Kiosk) Installation at Front Boundary In Accordance with S91 of the Environmental Planning & Assessment Act 1979, the subject application is Integrated Development. An approval under Part 3A of the Rivers & Foreshores Improvement Act 1948 issued from the Department of Land & Water Conservation is required. Approved Delegated 28/08/2003
CC-575/2003	Construction Certificate	Energy Australia Substation (Kiosk) Installation at Front Boundary. Approved Delegated 10/09/2003
DA-603/2003	Development Application	Roofed Drum Storage Bund. Withdrawn 26/08/2003
CC-409/2003	Construction Certificate	Roofed Drum Storage Bund. Withdrawn 26/08/2003
BA-1444/1996	Old Building Application	NEW CONCRETE BLOCK - file does not exist, assumed it was destroyed by fire. Approved 1996
DA-615/1995	Old Development Applications	Erection of a warehouse and dangerous goods store to be used in conjunction with an existing bituminous products manufacturing facility - S96(2). Approved Delegated 14/08/1996
BA-1126/1995	Old Building Application	FACTORY ALTERATIONS - S96(2) rec 15/07/99 Approved Delegated 27/08/1999
DA-615/1995/1	Old Development Applications	REINSTATEMENT OF FIRE DAMAGED BUILDING. Approved 1995

1.5 Document purpose

This SEE has been prepared to address the requirements of Part 4 of the EP&A Act, including the matters for consideration under Section 4.15 of the EP&A Act.

The primary objectives of this SEE are to:

- describe the existing environment;

- describe the proposed development;
- consider relevant statutory matters;
- assess the potential environmental and social impacts;
- recommend measures that will be implemented to mitigate and manage potential impacts;
- make conclusions and recommendations for Council's consideration.

This SEE has been prepared with input from technical specialists where required.

PROPOSED DEVELOPMENT DESCRIPTION

PROPOSED DEVELOPMENT DESCRIPTION

2 PROPOSED DEVELOPMENT DESCRIPTION

2.1 The proposed development

2.1.1 Overview

The proposed development comprises the construction and operation of:

- two 80 kL tanks, approximately 3.2 m in diameter and 15.8 m high, to store both processed and unprocessed bitumen, at separate times.

The tanks will be used for receipt of incoming raw materials and for storage of finished product awaiting filling into packages or road tankers.

Construction of the tanks would include:

- 8 x piles;
- 300 mm thick concrete pad;
- masonry block containment bund to comply with AS 1940: 2017;
- 17 x nozzles for different operational functions (e.g. heating, chimney and piping);
- insulation rings and spacing; and
- access ladders.

The two tanks will be prefabricated and installed adjacent to the southern boundary of the site on a concrete foundation pad within a designated bunded area. Each tank would be connected to various pre-existing operational services at the site, including above-ground electricity, gas and bitumen supply pipelines. Tank ventilation will be directed to the existing vapour scrubber stack (EPL Point 2) for air quality control. The proposed bunded area for the new tanks will be connected to the existing 'first flush' drainage system at the site.

The concept design for the proposed development is provided in Appendix A.

The project does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes.

2.1.2 Construction methodology

Construction staging and activities

Construction of the tanks would include the following general scope of work:

- Stage 1 – site preparation:
 - Before work commences, carry out preliminary investigations as required, including survey, underground and overhead services location, potholing and geotechnical investigations.
 - Complete Dig Before You Dig (DBYD) plans.
 - Establish environmental controls, including erosion and sediment controls installed in accordance with *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004) requirements, and exclusion fencing for sensitive areas.
 - Set up temporary site security fencing, protection of existing services (if required), and temporary laydown areas within the site.
 - Deliver all materials to site and temporarily store materials in designated laydown areas.
- Stage 2 – foundation construction:
 - Drilling and excavation

- > The existing hardstand area, where tank bunding will be constructed, will be broken up and removed off-site for appropriate recycling or disposal.
- > A drill rig will carry out the borehole drilling using solid flight augers once the existing hardstand has been removed. 450 mm diameter boreholes will be drilled to a depth of at least 1.5 m below the base of the adjacent stormwater drain.
- > Drilling will continue until piles reach a depth of 5 m or would bear onto material with a confirmed 600 kPa end-bearing capacity. Bearing capacities will be verified by an engineer during excavation.
- > Spoil from excavation will be loaded into trucks and transported offsite for lawful disposal. All waste from excavations will be tracked appropriately, with records kept on-site.
- > Each borehole will be filled with reinforcing steel and 32 MPa concrete to form the pile.
- Stage 3 – Concrete pad construction
 - A 300 mm thick concrete pad will be constructed over the piles within the previously removed hardstand area.
- Stage 4 – Tank installation and preparation
 - Both tanks will be lifted and manoeuvred into place on top of the concrete pad.
 - Each tank will be secured to the pad using designated footings.
 - All components associated with the tanks will be installed, including nozzles for connection to different operational functions.
 - Both tanks will be insulated and clad with 304 stainless steel providing a secondary tank skin.
- Bunding
 - The concrete pad area will be bunded with a masonry block wall designed to comply with AS 1940:2017.
 - The bunded areas will be connected to the existing first flush drainage system at the site, ensuring any contaminated runoff or leaks would be treated prior to discharge (see Section 5.5).

Excavation and hardstand removal

Excavation activities associated with the proposed works are related to the piles supporting the concrete slab and tanks. Piling excavations will be to a depth of 5 m or to wherever a bearing capacity of 600 kPa is reached. Bearing capacities will be verified onsite by an engineer during excavation. Excavations and hardstand removal works are expected to generate approximately 6 m³ of spoil and 8 m³ of concrete. Given the site is contaminated, spoil and concrete will be separated and disposed of lawfully in accordance with the Voluntary Management Plan (VMP) or Environmental Management Plan (EMP), whichever is in force at the time of construction (see Sections 5.7).

Construction hours

Construction would take place during standard construction hours recommended in the *Interim Construction Noise Guideline* (ICNG) (DECC, 2009):

- Monday to Friday – 7:00 am to 6:00 pm; and
- Saturdays – 8:00 am to 1:00 pm.

No work would be undertaken on Sundays or public holidays.

Construction timeframe

Construction is estimated to take approximately 6 months including 3 months of civil works and 3 months of pipe and electrical work.

Plant and equipment

The following plant and equipment would be used during construction:

- a drilling rig;
- a crane;
- a tracked excavator;
- a plate compactor;
- a telehandler;
- a concrete agitator truck;
- a flat bed truck; and
- hand tools.

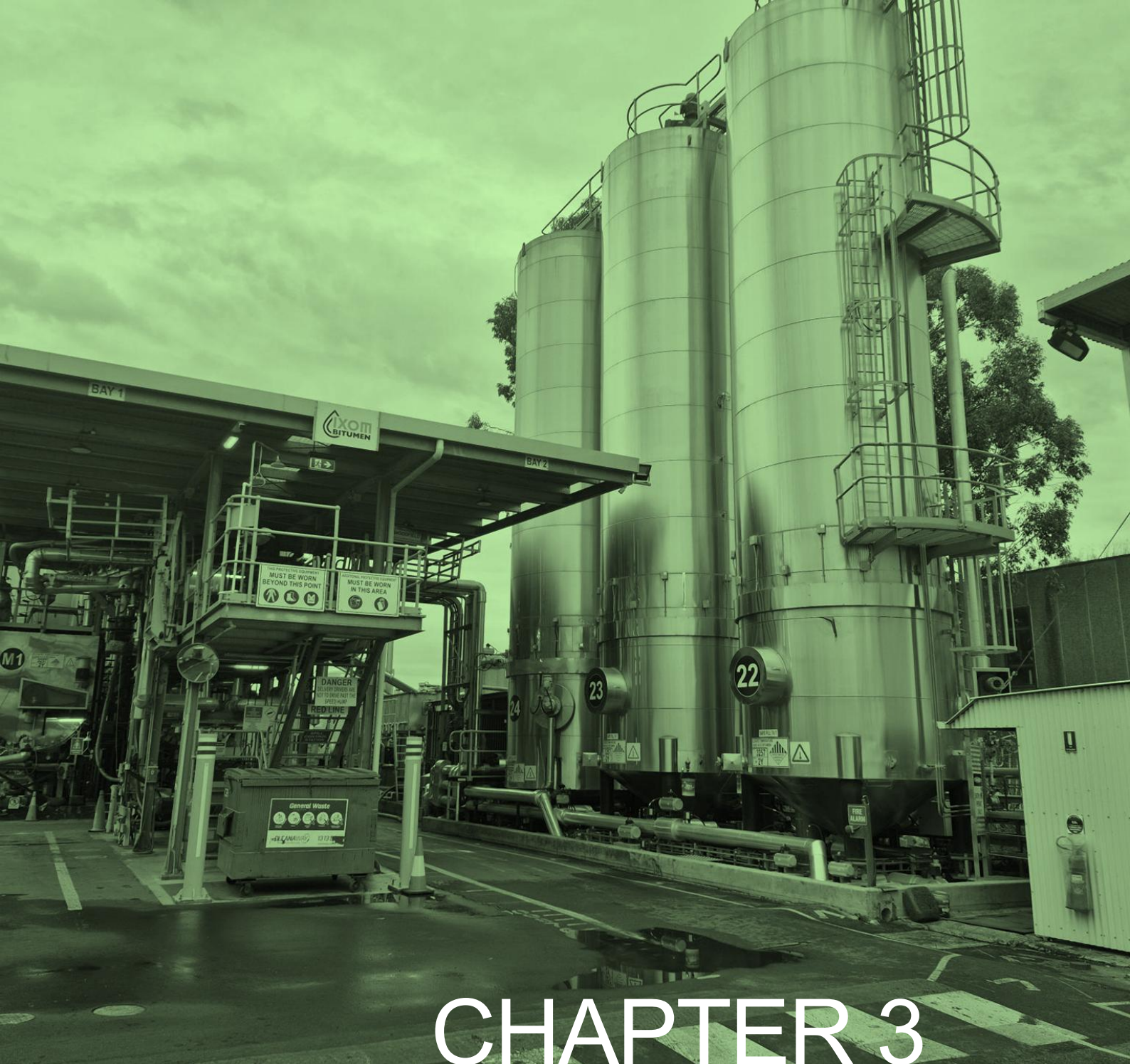
2.1.3 Estimated development cost

The estimated development cost of the proposed development is \$2.13 M inclusive of design and consultancy fees.

2.2 Need and justification

The existing facility currently accommodates bulk storage, processing and handling of bitumen products. As customer product specifications have become increasingly variable, there is a need to enhance the flexibility of on-site storage infrastructure. The proposed development would provide additional tank capacity to accommodate a broader range of product types and specifications, improving operational flexibility and product segregation without increasing overall production throughput.

The proposed development would be consistent with the existing land use and avoid the need for new greenfield development and making use of existing services, access and containment systems.



CHAPTER 3

LEGISLATIVE FRAMEWORK

3 LEGISLATIVE FRAMEWORK

3.1 Commonwealth legislation

The proposal is not expected to have any relationship with Commonwealth legislation considering:

- A search of the Protected Matters Search Tool (PMST) was undertaken on 28 April 2026 for matters of national environmental significance (MNES) and Commonwealth land within a 2 km radius of the proposed development, and no potential impacts were identified.
- The National Native Title Register, Register of Native Title Claims, Register of Indigenous Land Use Agreements and Native Title Application, Registration Decision and Determination records were searched for reported native title claimants in the LGA, and no Native Title has been prescribed for the site.
- Current operations at the facility do not trigger the threshold for reporting under the *National Greenhouse and Energy Reporting Act 2007* and approval of the proposed development would not change this.

3.2 NSW Legislation

In determining a development application, the consent authority is to take into account those matters listed under Section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), as they are relevant to the proposed development. This SEE has been prepared to address those requirements.

The proposed development itself is not a scheduled activity under Schedule 1 of the POEO Act and does not propose to change the existing EPL. It is therefore not considered 'integrated development' in accordance with Section 4.46(1) of the EP&A Act. However, as stated in Section 4.2, Council has noted that the DA will be referred to NSW EPA as a key stakeholder.

Table 3.1 summarises other NSW legislation relevant to the proposed development, which indicates that additional approvals, licences and/or authorisations are unlikely but may be required in relation to contaminated land management and groundwater dewatering.

Table 3.1: Summary of NSW legislation

Legislation	Overview
<i>Heritage Act 1977</i>	A search of statutory heritage registers did not identify the presence of any historic heritage listings within 200 m of the proposed development. The proposed development is not expected to result in any direct or indirect impacts on known or previously unidentified historic heritage items (see Section 5.8).
<i>Contaminated Land Management Act 1997</i>	The site is registered as contaminated land and currently managed under an approved Voluntary Management Plan (VMP). On 2 April 2026, NSW EPA notified IXOM that the conditions of the VMP had been adequately addressed and that the site was now to be managed under an Ongoing Maintenance Order (OMO). The OMO states that any residual contamination at the site is to be managed under a longer-term Environmental Management Plan (EMP). Construction of the proposed development, particularly spoil handling, classification and disposal, will be managed in accordance with either the VMP or the EMP, whichever is in place at the time.
<i>Protection of the Environment Operations Act 1997</i>	The existing bitumen processing facility, to which the proposed development is ancillary, operates under EPL 5267: Petroleum products and fuel production – general (Scale >10,000-200,000 tonnes per annum capacity). Ancillary activities include: ▪ Chemical storage – chemical storage waste generation. ▪ Chemical storage – petroleum products storage.

Legislation	Overview
	Waste storage – crumbed rubber and pre-processed waste oil. The proposed development itself is not a scheduled activity under Schedule 1 of the POEO Act and does not propose to change the existing EPL.
<i>Water Management Act 2000</i>	The proposed development is within the Lower Georges River and Bunbury Curran Creek water source, and the Water Sharing Plan (WSP) for the Greater Metropolitan Region Unregulated River Water Sources 2023 applies to the site. The site is not within 40 m of a natural watercourse or water body and therefore would not require a controlled activity approval. The proposed development does not involve the taking of water from any surface water or groundwater source and would not require a Water Access Licence. Any groundwater removed during piling is expected to be minor and below the 3 ML per water year exemption threshold. If greater groundwater inflows are encountered, water licensing requirements will be reviewed before continuing works involving dewatering.
<i>Environmental Planning and Assessment Regulation 2021</i>	The proposed development does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes and is therefore not considered designated development under clause 8 or clause 12 schedule 3 of the EP&A Reg. The proposed development would not exceed the chemical use or storage volumes that trigger designated development under clause 12 or clause 13 schedule 3 of the EP&A Reg.

3.3 Environmental planning instruments

EPIs such as SEPPs, regional environmental plans (REPs) and LEPs are legal documents that regulate land use and establish requirements for development consent in NSW.

3.3.1 State Environmental Planning Policies

The SEPPs considered in relation to the proposed development are summarised in Table 3.2.

Table 3.2: Relevant SEPPs

SEPP	Overview
State Environmental Planning Policy (Biodiversity and Conservation) 2021 (BC SEPP)	Chapter 6 of the BC SEPP applies to land within the Georges River catchment in which the proposed development is located and outlines controls on specific and general development. Division 2, Part 6.2 of Chapter 6 outlines controls for general development relating to water quality and quantity, aquatic ecology, flooding, recreation and public access and total catchment management. The controls must be considered before a consent authority can grant development consent. The proposed development is located within flood prone land. Flooding and stormwater management have been considered in Section 5.4.
State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)	The proposed development does not constitute State or regionally significant development under Part 2.2 or 2.4 of the Planning Systems SEPP.
State Environmental Planning Policy (Resilience and Hazards) 2021 (Hazards SEPP)	Chapter 3 requires the consent authority to consider whether a development proposal is a potentially hazardous industry or a potentially offensive industry and refers to <i>Hazardous and Offensive Development Application Guidelines: Applying SEPP 33</i> (Department of Planning, 2011) for assessing potentially hazardous and offensive development. The proposed development does not trigger the SEPP 33 storage thresholds for a Preliminary Hazard Analysis (PHA) based on bitumen product, which is considered a Class 9 product under the Australian Dangerous Goods (ADG) code. Other risks identified in the Applying SEPP 33 Guideline, including adjacent dangerous good storage, bitumen transfer and truck loading within

SEPP	Overview
	the site, high bitumen temperatures, flammable vapours, boil over and a previous fire event are readily managed by existing site procedures. Hazards and risks associated with the proposed additional bitumen tanks are nevertheless assessed in Section 5.1. Chapter 4 of the Resilience and Hazards SEPP aims to provide a state-wide planning approach to the remediation of contaminated land and to reduce the risk of harm to human health and the environment by consideration of contaminated land as part of the planning process. Under Section 4.6 of the SEPP, a consent authority must not consent to the carrying out of development on land unless it has considered potential contamination issues. The site has been declared significantly contaminated land and regulated by NSW EPA since 2007. Site remediation and environmental monitoring followed and in 2023 EPA accepted a Voluntary Management Proposal (VMP) to manage residual contamination. In April 2026, EPA contacted the site owner (IXOM) to announce their intentions to repeal the declaration of significantly contaminated land, end the VMP and establish an OMO which would manage residual risks. The construction of the proposed development will be managed under the VMP or EMP, whichever is in force at the time.

3.3.2 Canterbury-Bankstown Local Environmental Plan 2023

The proposed development would be carried out on land zoned as E4 – General Industrial under the CBLEP. The proposed development does not fit the definitions of light or heavy industry under the CBLEP and is therefore classified as ‘General Industry’. ‘General Industry’ is permissible with consent under the E4 – General Industrial Land zone according to the CBLEP.

The proposed development has been considered against the objectives of the E4 (General Industrial) land use zone and applicable provisions adopted under the CBLEP, as detailed in Table 3.3.

Table 3.3: CBLEP considerations

Objective/provision	Consistency
Zone objectives	
To provide a range of industrial, warehouse, logistics and related land uses.	The proposed development would support the facility, which currently provides industrial services suitable for the land use zone.
To ensure the efficient and viable use of land for industrial uses.	The proposed development would increase operational efficiency at the site to meet ongoing product demands.
To minimise any adverse effect of industry on other land uses.	The proposed development will be confined to the disturbed footprint of the facility. As outlined in Chapter 5, there are no expected impacts to nearby residential land use zones.
To encourage employment opportunities.	The proposed development will increase operational efficiency and support continued operations at the site.
To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.	The proposed development would support the facility that provides bitumen products for non-industrial land uses.
To support and protect industrial land for industrial uses.	The proposed development would be within the disturbed footprint of the facility and not require any expansion or rezoning of land zones.

Objective/provision	Consistency
To promote a high standard of urban design and local amenity.	Visual impacts of the proposed development will be mitigated through those measures outlined in Section 5.6.
Applicable provisions	
Section 5.21 Flood planning: (2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development— (a) is compatible with the flood function and behaviour on the land, and (b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and (c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and (d) incorporates appropriate measures to manage risk to life in the event of a flood, and (e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.	As per, Section 10.7 Planning Certificates issued by Council, the land, or part of the land, is within the flood planning area and consequently the probable maximum flood (PMF), and subject to flood related development controls. Flood related development controls are prescribed in the Canterbury Bankstown Development Control Plan 2023 and reviewed in Table 3.4. A Stormwater System Report issued by Council identified the site flood hazard category as Low and notes that a flood study is not required (Appendix D). However, flooding is further assessed in Section 5.4.
Section 6.3 Stormwater management and water sensitive urban design: (3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development— (a) is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and (b) includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and (c) avoids significant adverse impacts of stormwater runoff on the land on which the development is carried out, adjoining properties and infrastructure, native bushland and receiving waters, or if the impact cannot be reasonably avoided, minimises and mitigates the impact, and (d) includes riparian, stormwater and flooding measures, and (e) is designed to incorporate the following water sensitive urban design principles— (i) protection and enhancement of water quality, by improving the quality of stormwater runoff from urban catchments, (ii) minimisation of harmful impacts of urban development on water balance and on surface and groundwater flow regimes, (iii) integration of stormwater management systems into the landscape in a way that provides multiple benefits, including water quality protection, stormwater retention and detention, public open space and recreational and visual amenity.	The tank bunding would connect to the site's existing stormwater retention and treatment system, without requirement for any upgrades to the system. There is no change to the catchment area of the retention and treatment system. No new connections to Council stormwater infrastructure are proposed.

3.3.3 Canterbury Bankstown Development Control Plan 2023

Table 3.4 details the relevant DCP requirements (including those flood related) and provides information in relation to the proposed development.

Table 3.4: Relevant sections of the CBDCP

DCP section	Control applying to the site	Comment
Chapter 2 Site considerations: 2.2 Flood risk management		
Section 3: General development controls		
General development controls	The proposed development should not result in any significant increase in risk to human life, or in a significant increase in economic or social costs as a result of flooding.	The proposed development is for two 80 kL tanks and does not involve human occupation. The proposed development would not impact the flood evacuation and management protocols for the site. The development does not alter percentage impervious area and has a minor effect on floodplain storage.
	The proposal should only be permitted where effective warning time and reliable access is available to an area free of risk from flooding, consistent with any relevant flood plan or flood evacuation strategy.	
	Development should not significantly increase the potential for damage or risk to other properties either individually or in combination with the cumulative impact of development that is likely to occur in the same floodplain.	
	Motor vehicles are able to be relocated, undamaged, to an area with substantially less risk from flooding, within effective warning time.	The proposed development would not impact traffic movements or parking at the site.
	Procedures would be in place, if necessary, (such as warning systems, signage or evacuation drills) so that people are aware of the need to evacuate and relocate motor vehicles during a flood and are capable of identifying the appropriate evacuation route.	The proposed development would not impact the flood evacuation and management protocols for the site.
	To minimise the damage to property, including motor vehicles, arising from flooding.	
	Development should not result in significant impacts upon the amenity of an area by way of unacceptable overshadowing of adjoining properties, privacy impacts (e.g. by unsympathetic house-raising) or by being incompatible with the streetscape or character of the locality.	The proposed development is located on the southern border of the site which is adjacent to a stormwater canal. Any overshadowing of the adjacent industrial property to the south would be minor.
Schedule 3: Georges River floodplain, low flood risk, commercial and industrial.		
General controls	Freeboard equals an additional height of 500 mm.	There is no proposed change to site levels.
	The relevant environmental planning instruments (generally the Local Environmental Plan) identify development permissible with consent in various zones in the LGA. Notwithstanding, constraints specific to individual sites may preclude Council granting consent for certain forms of development on all or part of a site. This matrix identifies where certain development types will be considered "potentially unsuitable" due to flood risks.	The proposed tanks will be raised on legs above the Probable Maximum Flood (PMF) level. Tank hold-down arrangements will be as per AS 1940: 2017 <i>The storage and handling of flammable and combustible liquids</i> .
	Council can consider a DA for a "potentially unsuitable use" that clearly complies with the objectives of this DCP and with the performance criteria. In this case, prescriptive controls will be applied on a DA specific.	

DCP section	Control applying to the site	Comment
	Filling of the site, where acceptable to Council, may change the FRP considered to determine the controls applied in the circumstances of individual applications. Refer to Section 5 of this DCP for planning considerations for proposals involving only the erection of a fence. Any fencing that forms part of a proposed development is subject to the relevant flood effects and structural soundness planning considerations of the applicable land use category. Terms in italics are defined in this DCP and Schedule 2 specifies development types included in each land use category. These development types are generally as defined within Environmental Planning Instruments applying to the LGA. From time to time, Council may adopt mapping showing the Boundary of Significant Flow and/or Flood Storage Areas for this floodplain. Refer to Council to find out if these areas have been defined and mapped for this floodplain.	
Floor level	Habitable floor levels to be no lower than the 100-year flood level plus freeboard.	The proposed development would not have floor levels and is not for human occupation.
Flood effects	Flood impacts to be considered in the case of major development if Council advise that the development may generate flood impact, such as significant loss of storage or conveyance. Any assessment may also be asked to demonstrate that the proposed development is structurally sound.	The minor development does not alter percentage impervious area and has a minor effect on floodplain storage. There is no proposed change to site levels.
Evacuation	Evacuation requirements to be advised by Council if necessary. Contact Council for advice as early as possible.	The proposed development would not impact the flood evacuation and management protocols for the site.
Car parking and driveway access	Flood related parking and access requirements to be advised by Council if necessary. Contact Council for advice as early as possible.	The proposed development would not impact traffic movements or parking at the site.
Chapter 3 general requirements: 3.1 Development engineering standards		
Section 3: Stormwater drainage systems		
Development impacted by stormwater systems	Applicants must apply to Council for a Stormwater System Report (SSR), prior to submitting an application, if the site is noted on Council's SSR register as affected by Council's stormwater drainage pipelines and/or affected by potential local stormwater flooding. The development must be designed to consider the recommendations of the SSR and satisfy the requirements of this DCP.	An SSR was received on 1 April 2026 (Appendix D). The SSR indicated that the flood hazard category for the site is low and a flood study would not be required for the proposed development.

DCP section	Control applying to the site	Comment
	It is the applicant's responsibility to locate and verify Council's stormwater drainage system as shown on the SSR or other information given by Council, including OLFPs where the stormwater system is located within the site. Development must be designed and constructed to make provision for overland flow from stormwater runoff generated by external upstream catchments.	According to the Council Stormwater System Report (Appendix D), the site is affected by the below Council stormwater system components: Pipe Type (diameter in mm): Drain(2090x9500x5800), Open Drain(2500x5030x4500) (according to Council records) and associated variable width drainage easement located along the eastern side boundary within and adjacent to the site. Open Drain(2500x5300x4900) (according to Council records) and associated drainage reserve located along the southern side boundary adjacent to the site. Underground services have been located using radar on-site to confirm that the proposed development will not affect Council's stormwater infrastructure.
Disposal of stormwater runoff	Site stormwater drainage systems should be designed to flow under gravity, and be connected to Council's stormwater drainage system at the nearest suitable location or CDL benefiting the site. Site drainage design should follow the natural fall of the catchment to a pipeline connection point that has been designed for the runoff. Catchment redirections may be permitted subject to compliance with requirements outlined below. A separate approval to connect to Council's stormwater drainage system must be obtained from Council. Permission to carry out the works must be obtained by applying for the relevant Work Permit. The final number of drainage outlets will be determined by Council through the WP process and the Storm Water Connection Plan Approval. Pipelines constructed across the footway must generally be confined to within the site frontage. In certain circumstances Council may consider allowing the pipeline to extend a maximum of 20m along the footway in front of adjoining site. The applicant must demonstrate that the development potential of the adjoining site, including construction of VFCs, will not be adversely affected.	The tank bunding would connect to the site's existing stormwater retention and treatment system. No new connections to Council infrastructure are proposed. See section 5.4.
Overland flow paths for stormwater from upstream catchments	Overland flow paths must be considered and designed where stormwater runoff, in excess of the design capacity of the pipelines for the upstream catchment, has the potential to flow through a site. Overland flow paths must be considered and designed for the stormwater runoff developed from within the site as well. The applicant may be required to provide Council with a flood study to determine the OLFP requirements, for assessment with the application plans. If a site has all of or part of a natural depression forming an OLFP within it, then Council may require an unobstructed OLFP, of adequate capacity, be maintained or constructed within the site. Often the natural depression coincides with a drainage easement, over a pipeline within the site. If the	The development footprint is within the stormwater catchment of the site's existing stormwater retention and treatment system. No overland flow paths would be affected.

DCP section	Control applying to the site	Comment
	drainage easement is not coincidental to the natural depression where overland flow may occur, then Council may require a depression be created over the easement or an easement for overland flow be created over the natural depression area. In general, Council does not allow structures that will obstruct, block or adversely divert overland flow to be placed or constructed in the OLFP. Applicants should plan a development so OLFPs are directed along driveways, through common grassed areas and where fencing requirements are minimised or limited. OLFPs through courtyard areas are discouraged and should not be proposed on new sites. Redirection of OLFP is permitted within the site provided there is no adverse effect on adjacent sites.	
Earthworks within Overland Flow Path (OLFP)	Any earthworks or alteration to existing surface levels in a Council drainage easement, drainage reserve, or constructed OLFP, must be carried out in accordance with the approved design of the OLFP or as directed by Council.	
Section 4: On-site Detention Systems		
Multi-dwelling development and non-residential development	Multi-dwelling development and non-residential development will require OSD regardless of the impervious area before and after the development, and regardless of whether the site falls toward or to the street. For the purpose of this clause, impervious area includes buildings, outbuildings, roofs, concrete driveways, concrete paths, paved and hard surface areas. Driveways, courtyards and pathways constructed with gravel, grasscrete or pervious pavers are considered to be impervious for drainage calculation purposes. Swimming pools are considered as porous landscaping and calculated similar to grass.	Runoff collected within the proposed development footprint will be bunded and connected to the site's existing OSD.
Chapter 3 general requirements: 3.3 Waste management		
Section 5: Industrial development		
All industrial development types	Development must provide an appropriate and efficient waste storage system that considers: (a) the type of business; (b) the volume of waste generated on-site; (c) the number of bins required for the development and their size; (d) additional recycling needs e.g. cardboard, pallets and milk crates; (e) waste and recycling collection frequencies. Development is to consider potential future uses, particularly where separate waste containers may be required for industrial process type waste and bunding of bin storage areas.	Operation of the additional tanks will generate little waste – a few hundred kilograms of carbon deposits per annum will be disposed off-site with a licenced waste contractor during occasional tank servicing exercises. No change to waste storage or collection services. See Section 5.8.

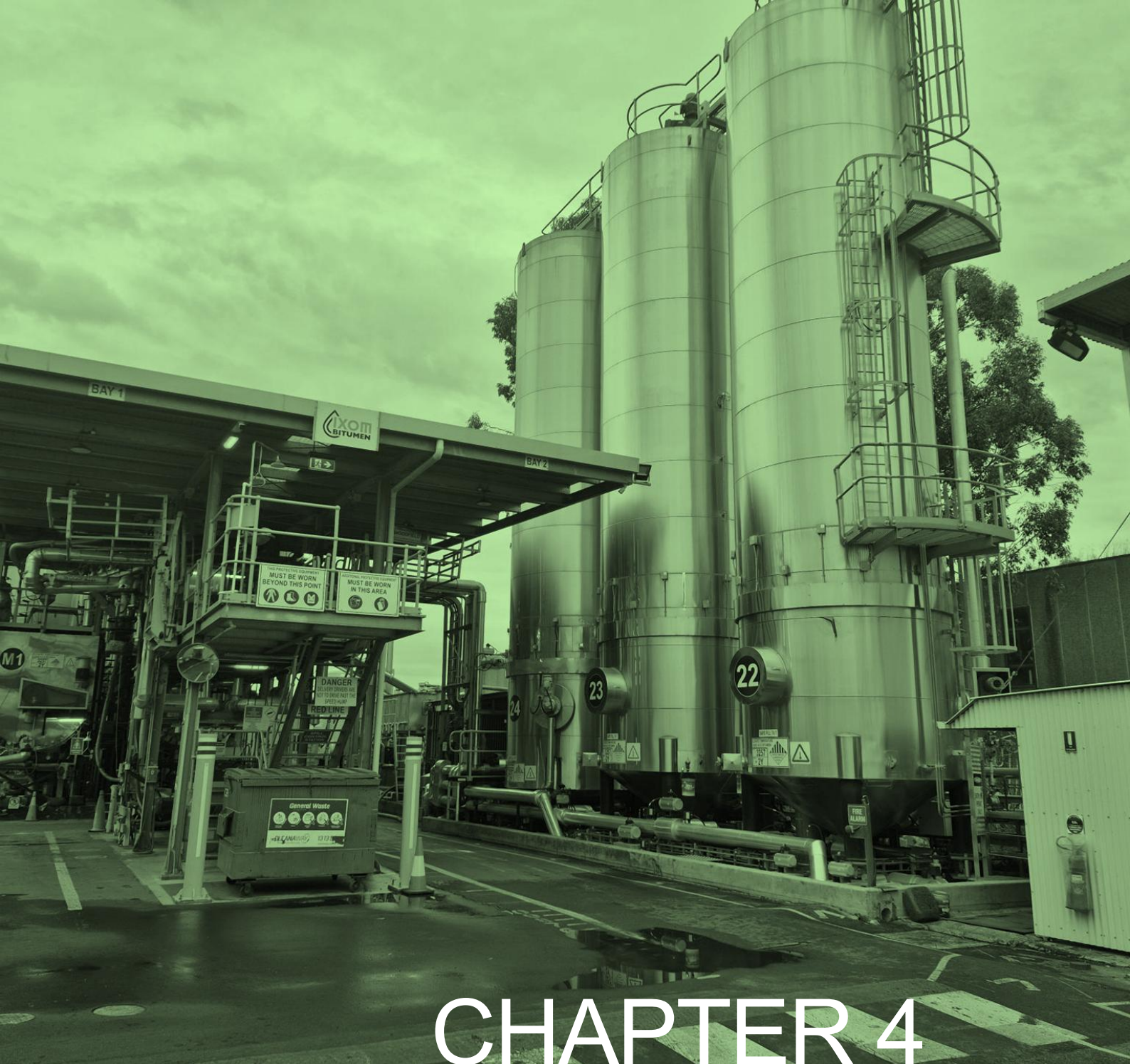
DCP section	Control applying to the site	Comment
	Bin storage areas are to integrate with the overall design and functionality of development and are to locate within the building envelope to enable these areas to be screened from view from the public domain.	No change to waste storage or collection services. See Section 5.8.
	An on-site collection point is to be nominated for development. The location of the collection point must allow collection vehicles to enter and exit the site in a forward direction and allow all vehicle movements to comply with the Australian Standard AS 2890.2. The location of the collection point must ensure waste servicing does not impact on any access points, internal roads and car parking areas.	No change to waste storage or collection services. See Section 5.8.
	Waste collection frequency is to be a minimum of once per week. Higher collection frequency may be required for development with larger waste generation rates and to ensure bin storage areas are kept clean, hygienic and free from odours. Higher collection frequencies must not impact on neighbouring residents in relation to noise, odour and traffic.	No change to waste collection frequency. See Section 5.8.
Chapter 9 Industrial precincts: 9.1 General requirements		
Section 1: Introduction		
Desired character – Industrial precinct	The Industrial Precinct will continue to support successful employment and economic activity as its primary role. This precinct is vital to Canterbury-Bankstown's position and future economic success in the Central River City, and will continue to offer residents jobs closer to home. The built form will be mostly contemporary industrial development set on large lots within a safe and high quality environment. Non-industrial development will be limited to land uses that are compatible with the primary employment role of the precinct. The Industrial Precinct will continue to support successful employment and economic activity as its primary role. This precinct is vital to Canterbury-Bankstown's position and future economic success in the Central River City, and will continue to offer residents jobs closer to home. The built form will be mostly contemporary industrial development set on large lots within a safe and high quality environment. Non-industrial development will be limited to land uses that are compatible with the primary employment role of the precinct.	The proposed development would offer operational support to the site's existing use as a bitumen processing facility, thus aligning with the desired character controls of the CBDP.
Section 2: Building form and landscape		
Site cover	The sum of the total area of building(s) on the ground floor level must not exceed 70% of the site area.	N/A
Side and rear setbacks	Council may require minimum setbacks to the side and rear boundaries of the site: (a) to maintain reasonable solar access or visual privacy to neighbouring dwellings; or (b) to avoid an easement or tree dripline on the site or adjoining sites; or	The proposed tank positions will maintain separation distances from site boundaries in accordance with AS 1940 (2017) or meet the AS 1940 performance specification by other means such as engineering controls (e.g. double skin tanks).

DCP section	Control applying to the site	Comment
	(c) to comply with any multi-level risk assessment undertaken for a development that ascertains the need for an appropriate setback or buffer zone between the development and any adjoining or neighbouring land within a residential zone. The design of buildings must ensure that: (a) At least one living area of a dwelling on an adjoining site must receive a minimum three hours of sunlight between 8.00am and 4.00pm at the mid-winter solstice. Where this requirement cannot be met, the development must not result with additional overshadowing on the affected living areas of the dwelling. (b) A minimum 50% of the required private open space for a dwelling that adjoins a development receives at least three hours of sunlight between 9.00am and 5.00pm at the equinox. Where this requirement cannot be met, the development must not result with additional overshadowing on the affected private open space.	The proposal does not have any bulk and scale or overshadowing impacts on residential properties or dwellings.
Development adjacent to channelled watercourses	Development must provide access to channelled watercourses for maintenance and repair.	The proposed development would not prevent access to the stormwater canal adjacent to the site.
Open space	Development must: (a) retain and protect any existing trees identified by Council on the site and adjoining sites; and (b) must not change the ground level (existing) within 3m of the base of the trunk or within the dripline, whichever is the greatest.	The proposed development would not impact any vegetation at or adjacent to the site.
Employee amenities	Development must provide an outdoor employee amenity area with a minimum area of 25m². This area should include a combination of grass, plantings, pavement, shade, and seating to allow employees to engage in a pleasant working environment. Development must locate the employee amenity area away from sources of intrusive noise (such as loading and servicing, and heavy machinery), dust, vibration, heat, fumes, odour or other nuisances.	The proposed development would not impact on existing employee amenities at the site.
Section 3: Building design		
Façade design	Development must articulate the facades to achieve a unique and contemporary architectural appearance that: (a) unites the facades with the whole building form; (b) composes the facades with an appropriate scale and proportion that responds to the use of the building and the desired contextual character; (c) combines high quality materials and finishes; (d) considers the architectural elements shown in Figure 3a; and (e) considers any other architectural elements to Council's satisfaction. Development may have predominantly glazed facades provided it does not cause significant glare nuisance.	The façade of the proposed tanks would be stainless steel 304, consistent with other tanks already approved at the site and CBDP requirements.

DCP section	Control applying to the site	Comment
Façade design materials	Development must use: (a) quality materials such as brick, glass, and steel to construct the facades to a development (Council does not permit the use of standard concrete block); and (b) masonry materials to construct a factory unit within a building, and all internal dividing walls separating the factory units. Despite this clause, Council may consider a small portion of the street facade to comprise metal sheet or other low maintenance material provided it complies with the Building Code of Australia.	
Safety and security	Where the site shares a boundary with a railway corridor or an open stormwater drain, any building, solid fence, or car park on the site should, wherever practical, be setback a minimum 1.5m from that boundary. The setback distance must be: (a) treated with hedging or climbing vines to screen the building, solid fence, or car park when viewed from the railway corridor or open stormwater drain; and (b) (c) (d) (e) (f) the hedging or climbing vines must be planted prior to the completion of the development using a minimum 300mm pot size; and the planter bed area must incorporate a commercial grade, sub-surface, automatic, self-timed irrigation system; and the site must be fenced along the boundary using a minimum 2m high chain wire fence; and the fence provides an appropriate access point to maintain the landscaping within the setback area; and where a car park adjoins the boundary, hedging or climbing vines must also be planted along the sides of any building or solid fence on the site that face the railway corridor or open stormwater drain. If a setback for landscaping under this clause is impractical, other means to avoid graffiti must be employed that satisfies Council's graffiti minimisation strategy.	The proposed development would include an approximate set back of 1 m from the side boundary which is adjacent to the stormwater canal. This is consistent with other existing infrastructure at the site. Vegetation within the setback area is unsuitable given the site's industrial use. The proposed development will not impact on existing fencing along the site boundary.
General	Council must take into consideration the following matters for development in the E4 zone: (a) whether the proposed development will provide adequate off-street parking, relative to the demand for parking likely to be generated; (b) whether the site of the proposed development will be suitably landscaped, particularly between any buildings and the street alignment; (c) whether the proposed development will contribute to the maintenance or improvement of the character and appearance of the locality; (d) whether access to the proposed development will be available by means other than a residential street but, if no other means of practical access is available, the consent authority must have regard to a written statement that: (i) illustrates that no alternative access is available otherwise than by means of a residential street; and (ii) demonstrates that consideration has been given to the effect of traffic generated from the site and the likely impact on surrounding residential areas; and	The proposed development is not for human occupation and would not require additional car parking. The existing car park at the site will not be impacted by the proposed development. The visual amenity of the proposed development is consistent with the existing site. Potential visual impacts of the proposed development have been assessed qualitatively and are detailed in Section 5.6. The proposed development will be readily accessible via existing means at the site. For instance, the driveway, surrounding hardstand and internal walkways.

DCP section	Control applying to the site	Comment
	(iii) identifies appropriate traffic management schemes which would mitigate potential impacts of the traffic generated from the development on any residential environment; (e) whether goods, plant, equipment and other material used in carrying out the proposed development will be suitably stored or screened; (f) whether the proposed development will detract from the amenity of any residential area in the vicinity; and (g) whether the proposed development adopts energy efficiency and resource conservation measures related to its design, construction and operation.	
Section 4: Environmental Management		
Acoustic privacy	Development must: (a) consider the Noise Policy for Industry and the acoustic amenity of adjoining residential zoned land; and (b) may require adequate soundproofing to any machinery or activity that is considered to create a noise nuisance.	The proposed development would add an insignificant contribution to existing operational noise levels at the approved site. Management and mitigation measures for noise impacts from the proposed development are detailed in Section 5.2.
Pollution control	Development must adequately control any fumes, odour emissions, and potential water pollutants in accordance with the requirements of the relevant public authority.	Tank emissions are associated with the proposed development. Management and mitigation measures for increased tank emissions at the site are detailed in Section 5.3. The tank bunding would connect to the site's existing stormwater retention and treatment system. Air emissions from the tanks will be subject the limits of an existing Environmental Protection Licence.
Section 5: Site facilities		
Storage areas	The storage and use of hazardous materials must comply with the requirements of WorkCover NSW and other relevant public authorities.	The proposed development is for the storage of processed and unprocessed bitumen at separate times. Bitumen is a Class 9 dangerous good according to the Dangerous Goods Code which is not considered hazardous. Nevertheless, hazards and risks associated with the proposed additional bitumen tanks have been assessed in Section 5.1.
	The storage and use of dangerous goods must comply with the <i>Dangerous Goods (Road and Rail Transport) Act 2008</i> and its regulations, and any other requirements of WorkCover NSW.	The proposed development will be designed in accordance with the <i>Dangerous Goods Act 2008</i> and any requirements of WorkCover NSW.
Building design (utilities and building services)	The location and design of utilities and building services (such as plant rooms, hydrants, equipment and the like) must be shown on the plans.	Subject to detailed design.
	Utilities and building services are to be integrated into the building design and concealed from public view.	
	External lighting to industrial development must give consideration to the impact of glare on the amenity of adjoining residents.	Outdoor lighting is proposed near ground level at tank fill points and stairs. The lighting would be controlled so as to not affect neighbouring properties or Violet Street road users.

DCP section	Control applying to the site	Comment
	Council may require development to include public domain improvements to an adjacent footpath in accordance with a design approved by Council's Landscape Architect.	Noted.



CHAPTER 4

CONSULTATION

4 CONSULTATION

4.1 Community consultation

Community consultation has not been undertaken for the proposed development as the assessment of environmental impacts (see Chapter 5) indicates that the proposed works would:

- be minor in scale;
- occur within a previously disturbed environment within the facility;
- be consistent with the surrounding land use; and
- minor adverse impacts (mainly construction noise and air impacts) would be readily mitigated through standard mitigation and management measures.

A site information board would be provided at the front of the site with relevant details about site contacts and construction hours.

4.2 Council consultation

A Pre-DA meeting request was sent to Canterbury Bankstown Council on 30 March 2026, accompanied by a project briefing letter.

The project briefing letter highlighted key areas that Element (on behalf of IXOM) sought council advice on. Element wished to confirm:

- Council's stance on whether a PHA was required.
- Any flood-related development controls that apply to the site.
- Application of the existing Voluntary Management Proposal (VMP) to manage existing site contamination
- Community consultation requirements for the proposal.
- Agency consultation requirements and invitation for Council to join EPA discussions.

Council responded to the pre-DA meeting request via email on 6 May 2026, stating they had no issues in regard to the proposed development on the basis that:

- The DA is to be accompanied by a Preliminary Acid Sulfate Soils Assessment that adheres to the *Acid Sulfate Soils Assessment Guidelines* (NSW Acid Sulfate Soils Management Advisory Committee, 1998); and
- The DA would be referred to the EPA for the provision of General Terms of Approval (GTA) given the site's existing EPL.

As per Council's pre-DA advice, a Preliminary Acid Sulfate Soils Assessment has been completed (refer to Section 5.7 and Appendix F).

Council correspondence and the project briefing letter are provided in Appendix C.

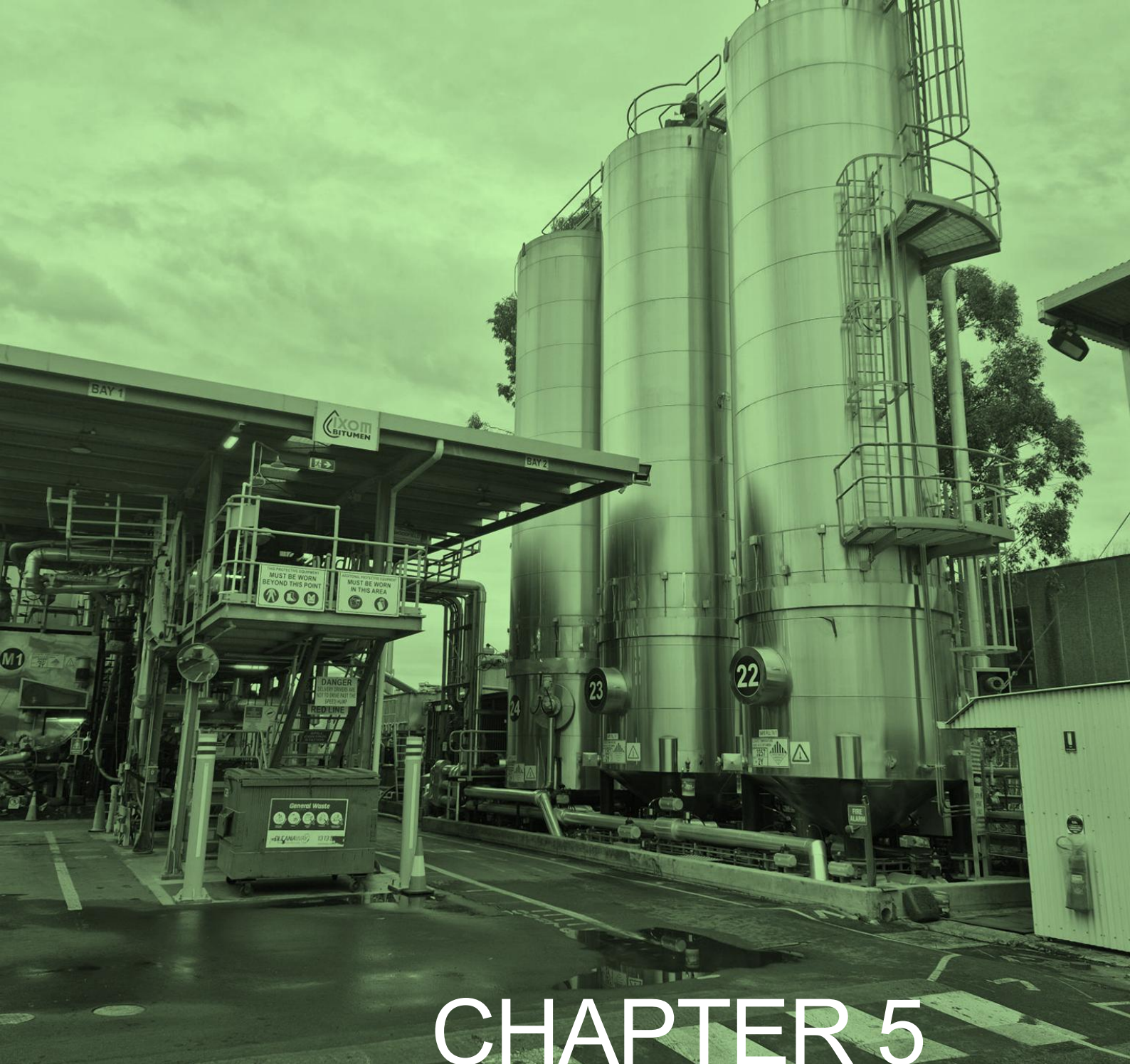
4.3 EPA consultation

An email, with a project briefing letter attached, was sent to the EPA on 22 April 2026 informing the proposed development and presenting the proposed scope of environmental assessments for the SEE. EPA's feedback was sought.

The EPA responded via email on 29 April 2026, declining the project meeting proposal but providing several comments for consideration. Table 4.1 details those comments and where they are addressed within this SEE.

Table 4.1: EPA comments

EPA comment	Response
Storage: Please note the following documents may apply to the bitumen storage: ▪ <i>AS1940:2017 The Storage and Handling of Flammable and Combustible Liquids</i> ▪ <i>Storing and Handling Liquids: Environmental Protection Participants Manual</i> (DECC, 2009)	The proposed development will be designed in accordance AS1940. There is an existing Stormwater Management Procedure (IXOM Bitumen, 2024) and an Emergency Response Plan for the site, which includes spill response.
Air: Please note the following may apply to any air and/or odour impact assessment that may be required: ▪ <i>NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> ▪ Part 5 of the <i>Protection of the Environment Operations (Clean Air) Regulation 2022</i>	Air impacts from the proposed development have been assessed qualitatively. As stated in Section 5.3, the existing scrubber at the site is estimated to have ample capacity to manage the anticipated pollutants from the proposed development.
Noise: Please note the following may apply for construction and/or operational noise: ▪ Department of Environment & Climate Change NSW <i>Interim Construction Noise Guideline</i> ▪ NSW EPA <i>Noise Policy for Industry</i> 2017, ▪ Department of Environment and Conservation NSW <i>Assessing Vibration: a technical guideline</i>	Potential construction noise impacts from the proposed development were assessed quantitatively using the TfNSW Construction Noise Calculator. Operational noise is expected to be insignificant. See Section 0
EPL: Please note the licence may be required to be varied should the development application be approved by Council.	The proposed development does not require any variation to the existing EPL, or a new EPL.



CHAPTER 5

ASSESSMENT OF IMPACTS

5 ASSESSMENT OF IMPACTS

This Chapter considers the likely impacts of the proposed development on the natural, built and socio-economic environments, in accordance with Section 4.15(1)(b) of the EP&A Act and other legislative requirements.

Impacts have been categorised as ‘key’ issues (impacts with the potential to be of a major or moderate nature) or ‘other’ issues (impacts with the potential to be of a minor nature), based on the consequence and likelihood of the impact. In determining the consequence, the scale of the impact (severity, geographical extent and duration) and sensitivity of the receiving environment has been considered.

5.1 Hazards and risks

Existing environment

The existing production, processing and storage areas at the site can be divided up into a number of functional entities as follows:

- Flammable Liquid Storage in bunded tanks.
- Combustible Liquid Storage in bunded tanks
- Mixers – bunded sigma-blade mixers. This area has facilities for loading and unloading road tankers.
- 6 x High Temperature Bitumen Tanks
- 2 x Cut Back Tanks
- Process Liquid Tanks – for process water and production by-product liquids
- Utilities including a boiler house, primarily for heating hot oil, a switchboard, compressor and an aboveground water treatment plant for the treatment of bund water.
- Drum and Package Store
- Packaging Storage and Recycling
- Office

The site is operating under EPL 5267, allowing for petroleum products and fuel production, and includes ancillary chemical storage, waste generation, petroleum storage, and crumbed rubber and pre-processed waste oil activities. Typical hazards associated with the approved activities at the site are related to the storage, heating, transfer, and handling of petroleum-based products. These activities can present risks to workers, site infrastructure, nearby land uses and the environment if materials are released, overheated, ignited or discharged to stormwater.

The site has previously been subject to a number of assessments, reviews and audits in relation to risk and hazards:

- Final Hazard Analysis (FHA) (1997), prepared by DNV Consulting Services for BP as required by consent conditions in DA-615/1995/3 for the construction of a dangerous goods store at the site;
- Hazard and Operability Study (HAZOP) (2004), prepared by BP and Oilsafe Pty Ltd for major site activities;
- An audit and review (2005) of the FHA (DNV,1996) and HAZOP (BP and Oilsafe, 2004) against consent conditions, prepared by Premier Engineering Services;
- HAZOP (2010), prepared by Planager Pty Ltd for site-wide activities;
- A Spill Risk Identification and Minimisation Report (2016), prepared by Premier Engineering Services; and
- A Hazard Analysis for proposed tank installations (2017), prepared by Premier Engineering Pty Ltd for Bituminous Products Pty Ltd.

Assessment methodology

Chapter 3 of the Hazards SEPP (refer to Table 3.2) requires the consent authority to consider whether a development proposal is a potentially hazardous industry or a potentially offensive industry and refers to *Hazardous and Offensive Development Application Guidelines: Applying SEPP 33* (Department of Planning, 2011) for assessing potentially hazardous and offensive development.

The proposed additional bitumen storage does not trigger the SEPP 33 storage thresholds for a Preliminary Hazard Analysis (PHA) based on bitumen product, which is considered a Class 9 product under the Australian Dangerous Goods (ADG) code. Other risks identified in the Applying SEPP 33 Guideline, including adjacent dangerous good storage, bitumen transfer and truck loading within the site, high bitumen temperatures, flammable vapours, boil over and a previous fire event are readily managed by existing site procedures.

The proposal is also not considered to be potentially offensive development, as potential impacts of the new tanks would be managed within the conditions of the existing EPL for the site.

Nevertheless, hazards and risks associated with the proposed additional bitumen tanks have been assessed (outside of the SEPP 33 PHA framework) as part of this SEE.

Potential impacts

The main risks identified from the proposed development are:

- loss of containment resulting in potential environmental damage;
- fire; and
- odours.

The primary hazardous event is a loss of containment, as this may act as a precursor to the other hazards mentioned above. Table 5.1 details the type of hazardous events, when they might occur and their respective potential impacts.

Table 5.1: Potential impact summary

Hazardous event	Typical occurrence (likelihood)	Potential consequences
Loss of containment via tank overflow	In the absence of effective operational controls, including alarms, sensors and monitoring.	▪ Localised pooling of hot bitumen. ▪ Damage to nearby equipment. ▪ Slip or burn hazards for operational personnel. ▪ Contamination of paved areas, and consequential damage to bunds, pits and/or drainage systems.
Loss of containment via leakage from joints, fittings or transfer infrastructure	During transfer or pumping activities when parts of the system are under pressure.	
Loss of containment via water contamination and boil-over	When water accumulates at the base of the tank (bitumen is lighter than water) and comes into contact with the heating coils, causing pressure effects leading to foaming, splashing, swelling or ejection of bitumen from the tank.	
Fire	During a loss of containment event or abnormal heating conditions, where flammable material is exposed to an ignition source.	▪ Combustion of products ▪ Safety hazards for operational personnel, emergency responders and, depending on the scale, adjoining land uses. ▪ Operational disruption ▪ Contaminated firewater or firefighting residues requiring

Hazardous event	Typical occurrence (likelihood)	Potential consequences
Odour	May arise if bitumen vapours or odorous emissions are released during abnormal operating conditions, a fire event, loss of containment, overheating, tank upset or failure of odour control systems.	containment and management. Offensive odour impacts on operational personnel, nearby workers or sensitive receptors depending on wind conditions and severity of odour emission.

The consequences of the most significant potential hazardous incidents are limited by containment provisions (bundling) for spills and fire water, fire prevention and suppression systems, emergency response provisions and procedures. The consequences of a loss of containment event are, in the first instance, limited to the tank and whole site bunding system (refer to Section 5.5).

The proposed bitumen tanks do not represent a new category of risk, as these materials are stored already. Therefore, existing control measures, both physical and procedural, are applicable. The site Spill Risk Identification and Minimisation Report and Emergency Response Plan are appropriate for the materials and activities undertaken.

Mitigation and management measures

The risk of fire in a petrochemical facility can have very severe consequences, so the greatest effort goes into fire prevention, and as noted above special attention is given to ensuring that loss of containment is controlled so that both the likelihood and consequence of a fire are minimised. Nevertheless, provision has to be made for dealing with a fire if it occurs. This includes provision and maintenance of first response facilities such as extinguishers and spill kits as well as a fully operational fire system.

The following mitigation and management measures would be implemented to reduce the risk associated with the identified hazardous events that may arise from the proposed development:

- The proposed development will be designed and installed in accordance with AS 1940:2017 *The storage and handling of flammable and combustible liquids*. This includes (but is not limited to) review of tank separation distances, bunding and fire protection systems.
- The existing fire system will be reviewed to confirm it meets requirements following the installation of the new tanks.
- The proposed development will be designed in accordance with the *Dangerous Goods Act 2008* and any requirements of WorkCover NSW.
- The bitumen tanks will be located within a bunded area to manage potential spills, leaks or overflows and prevent uncontrolled discharge from the tanks.
- Splash protection would be provided to reduce the potential for released material to affect nearby stormwater infrastructure or sensitive site drainage pathways.
- The proposed development would be fitted with level monitoring and alarm systems to assist operators in managing filling activities and reducing the risk of tank overfill.
- Tank level controls would be integrated with the site's existing control system, including appropriate interlocks where required to prevent operation of heating systems unless the tank contents are at a safe operating level.
- The tank foundations and bund structure will be designed by a suitably qualified engineer and consider the proximity of nearby structures and drainage assets, including the stormwater canal.
- Vapours from the bitumen tanks will be directed to the existing scrubber system to manage potential odour emissions during normal operation.

- The tanks would include appropriate pressure relief or venting arrangements to manage abnormal internal pressure scenarios, including those that may arise from water contamination or other upset conditions.
- Any displaced vapours, condensate or abnormal discharge from venting systems would be directed to appropriate containment or treatment infrastructure, rather than being released uncontrolled to the environment.
- The site Emergency Response Plan will be reviewed and updated before the proposed development commences, to include relevant emergency response procedures and site-specific firefighting considerations that may have changed due to the addition of two tanks at the site.
- Fire and Rescue NSW will be informed of the site developments and any updates to the site Emergency Response Plan.
- The proposal would be subject to the IXOM's internal Management of Change process to confirm that safety, environmental, operational, maintenance, emergency response, utilities and access implications have been reviewed before commissioning.
- Operating procedures for filling, transfer, maintenance and emergency response would be updated to account for the proposed development and communicated to relevant site personnel.
- Spill risks from the proposed development will be managed by monthly housekeeping checklists and a formal maintenance inspection regime focused on bund walls.
- The proposed development would be subject to routine inspection and maintenance to confirm the integrity of bunds, valves, pipework, alarms, vents, splash protection, level controls and associated safety systems. Any spills, leaks, odour incidents, alarms or equipment faults associated with the tanks would be recorded, investigated and managed in accordance with the site's environmental management and incident response procedures.

5.2 Noise and vibration

Existing environment

The receivers surrounding the site are predominantly characterised by industrial premises. The closest residential receivers are located over 300m to the south and east of the site. Existing noise attenuation is significant with surrounding industrial properties and major arterial roads such as Queen Street and the South Western Motorway situated between the facility and residential receivers. There are no other (non-residential) sensitive receivers relevant to the assessment of noise from the proposed development.

Existing noise at the facility is characterised by trucks delivering and loading bitumen products. Processing activities produce little noise, which is insignificant to sensitive receivers in the surrounding area. Operational noise is managed to remain below the criteria detailed in the EPL. In the latest EPL Annual Return there were no noise complaints recorded.

Assessment methodology

Temporary construction noise has been assessed quantitatively using the TfNSW (2022) Construction and Maintenance Noise Estimator Tool ('the TfNSW Noise Estimator').

The tool applies established NSW construction noise assessment methodologies and provides predictions of construction noise levels at surrounding sensitive receivers based on plant sound power levels, activity durations and distances. While developed for a transport authority, the tool is equally suitable for estimating noise from any construction activities which are of short duration (3 to 6 weeks) or where there are few affected receivers.

The assessment methodology and criteria are consistent with the following key guidelines:

- *Interim Construction Noise Guideline* (ICNG) (DECC, 2009);
- *Construction Noise and Vibration Guideline* (CNVG) (TfNSW, 2026); and
- *Noise Policy for Industry* (EPA, 2017).

The ICNG defines construction noise management levels (NMLs) for residential receivers during standard hours as:

- Noise affected: Rating Background Level (RBL) + 10 dB.
- Highly noise affected: 75 dB(A).

The NML for industrial receivers is 75 LAeq(15min) (external).

These criteria are used to determine the potential level of impact and the need for feasible and reasonable mitigation measures.

Potential impacts

Construction

As described at Section 2.1.2, construction is estimated to take approximately 6 months including 3 months of civil works and 3 months of pipe and electrical work and will take place during standard construction hours. The TfNSW Noise Estimator results (Appendix E) indicate that construction noise is not expected to exceed NMLs for surrounding residential and industrial receivers.

Construction activities (described at Section 2.1.2) are not expected to generate significant ground vibration that requires assessment.

Operation

The proposed development will have no impact to the production levels at the site. Therefore, noise levels associated with truck delivery and receipt of bitumen products are expected to remain unchanged once the proposed development is operational.

Operational noise from the proposed tanks would be limited to two transfer pumps, which are expected to have a sound power level (SPL) that is insignificant in the existing industrial environment.

The proposed development will continue to be managed in accordance with the noise levels stipulated in the EPL.

Mitigation and management measures

As there are no affected receivers, no specific noise mitigation and management measures are recommended for the proposed works. Nevertheless, standard mitigation and management measures are recommended during construction. These include:

- Construction workers will be made aware of noise concerns during worksite induction training and should be educated on noise sensitive issues and the need to minimise noise emissions as far as practicable.
- Equipment which is used intermittently will be shut down when not in use.
- Trucks will not be left standing with their engine running.
- Materials will not be dropped from heights into or out of trucks wherever possible.
- All regularly used construction vehicles and mobile plant will be fitted with non-tonal reversing beepers to be used at all times.
- All mechanical plant should be silenced by best practical means using current technology wherever possible. Noise suppression devices should be maintained to the manufacturer's specifications. Internal combustion engines should be fitted with a suitable muffler in good working order.

- Where possible, minimise the duration of simultaneous operation of noisy plant.
- Limit continuous blocks of high noise generating activities to three (3) hours, with a respite period of at least 1 hour between each block.

5.3 Air quality

Existing environment

Table 5.2 presents ambient air quality monitoring data applicable to the site. The monitoring data has been sourced from the DCCEE Air Quality Monitoring Station (AQMS) at Liverpool for the 2024 calendar year. The Liverpool AQMS is located approximately 9 km west of the site.

Table 5.2: Summary of background air quality monitoring

Pollutant	Background level	Units
Annual average TSP	68.9	µg/m ³
Annual average PM ₁₀	19.1	µg/m ³
Annual average PM _{2.5}	6.7	µg/m ³
Annual average deposited dust	3.1	g/m ² /month

EPL 5267 conditions

Table 5.3 details the air quality management measures required by EPL 5267.

Table 5.3: EPL air quality management measures

Management measure	Details
Control systems for each emission source at the facility	▪ All vapours and off-gases from bitumen processing activities are captured and treated prior to discharge (e.g. via thermal oxidiser and scrubber systems). ▪ Vapours displaced during tanker loading/unloading and mixing operations must be captured and treated to prevent odour emissions. ▪ Bitumen blowing processes are interlocked with the thermal oxidiser to ensure operation only occurs when sufficient treatment temperature is achieved (≥760°C).
Odour management	▪ Capturing and treatment of vapours. ▪ No perceivable odours outside of the site boundaries. ▪ Implementation of a Carbon Breakthrough Management Strategy.
Monitoring	▪ Annual stack testing for pollutants such as VOCs, NOx, particulates and sulfur compounds. ▪ Monitoring of gas parameters (flow, temperature, moisture, etc.). ▪ Odour monitoring at discharge points.
Operational controls	▪ Plant and equipment are maintained and operated efficiently. ▪ All activities are undertaken in a competent manner. ▪ Systems are in place to prevent spills, leaks and fugitive emissions. ▪ Pollution incidents must be reported and investigated.
Reporting and compliance	▪ Submit annual returns summarising emissions, monitoring results and compliance. ▪ Maintain records of monitoring and complaints. ▪ Notify the EPA of any incidents causing environmental harm.

Table 5.4 specifies the emission limits for key pollutants as stated in the EPL.

Table 5.4: EPL emission limits

EPA Identification Point	Pollutant	100 Percentile Concentration Limit	Averaging Period
Point 1 (Thermal oxidiser stack)	Volatile organic compounds	40 mg/m ³	1 hour
Point 1 (Thermal oxidiser stack)	Sulfuric acid mist and sulfur trioxide (as SO ₃)	100 mg/m ³	1 hour
Point 1 (Thermal oxidiser stack)	Nitrogen Oxides	350 mg/m ³	1 hour
Point 1 (Thermal oxidiser stack)	Solid Particles	50 mg/m ³	1 hour
Point 2 (Vapour scrubber stack)	Solid Particles	50 mg/m ³	1 hour
Point 2 (Vapour scrubber stack)	Volatile organic compounds	40 mg/m ³	1 hour

Assessment methodology

A qualitative assessment was undertaken to identify the potential air quality impacts associated with the proposed development. The assessment involved comparisons between the EPL emission limits and the latest stack emissions testing results, as reported in the EPL Annual Return Report (2025) report prepared by IXOM. The site's pollution complaints register and recent upgrading of the scrubber system were also considered in the assessment.

Potential impacts

Construction

Negligible air quality emissions (dust or exhaust fumes) are expected to be generated during civil works and installation of the two new prefabricated tanks.

Operation

The proposed development, along with 6 existing bitumen storage tanks currently operating at the site, will direct all emissions through the vapour scrubber stack (EPL Point 2), which was upgraded in 2021 to a higher capacity system with a larger carbon filter. The existing facility has also automated handling processes in 2019 and changed product specifications in 2023 to reduce operational air impacts. Table 5.5 details the most recent annual emissions from the vapour scrubber stack with reference to the EPL limits.

Table 5.5: 2025 air emission results

Monitoring point	Pollutant	EPL limit	2025 Actual result	Percentage of limit
Point 1 (thermal oxidiser)	VOC	40 mg/m ³	2.8 mg/m ³	7%
	Sulfuric acid mist and sulfur trioxide (as SO ₃)	100 mg/m ³	2 mg/m ³	2%
	Nitrogen oxides	350 mg/m ³	150 mg/m ³	43%
	Solid particles	50 mg/m ³	8.1 mg/m ³	16%
Point 2 (vapour scrubber)	Solid Particles	50 mg/m ³	< 3 mg/m ³	< 6%
	VOCs	40 mg/m ³	13 mg/m ³	33%
	Odour	-	780 ou	N/A

Table 5.5 indicates that the site is currently operating well below the EPL criteria for each measured pollutant. and the site's scrubber system appears to have ample capacity to manage air pollution from the proposed development.

The odour levels as detected by stack testing indicated low level of odour emissions that are expected not to cause offence at any adjacent or nearby receivers. Proper dispersion of low level odours from the stack are not expected to cause offence.

The EPL Annual Return Report (IXOM, 2025) also indicates there have been no complaints in regard to air pollution from existing operations.

Mitigation and management measures

The proposed development will continue to comply with the site's annual emission testing as required by the EPL. Should annual emission testing indicate that emissions exceed EPL criteria once the proposed development is operational, the scrubber will be upgraded, or an alternative pollution control device will be installed to maintain emissions below EPL criteria.

5.4 Flooding

Existing environment

The site is located within the Milperra sub-catchment of the Georges River catchment and, based on a recent site survey, site elevation ranges from 10.01 to 10.42 mAHD.

According to Council's Stormwater Systems Report (prepared 1 April 2026) (Appendix D), the Milperra Catchment Draft Flood Study Update (Milperra flood study) (BMT WBM, 2013) and the Georges River Flood Study (BMT, 2020), the site is impacted by the Probable Maximum Flood (PMF) event and the 1% Annual Exceedance Probability (AEP) flood event. Inundation at the site would be approximately 0.2 m during a 1% AEP flood and up to 1.1 m during a PMF. However, the site is located on a flood fringe and is categorised as low risk.

Assessment methodology

Flood-related development controls in the CBDP have been reviewed based on the site's low risk rating and found to comply (Table 3.4). Other potential flooding impacts are considered below.

Potential impacts

Construction

Construction plant, temporary materials and work areas could temporarily alter local flow paths during intense rainfall or flood events if poorly located. Given the short construction duration, existing industrial hardstand setting and low flood hazard classification, this risk is expected to be low, provided plant and materials are kept clear of drainage infrastructure, easements and known overland flow paths where practicable.

There is potential for sediment to migrate into the adjacent stormwater canal if flood waters encounter open excavations during construction. Similarly, contaminants from potential fuels, oils, spills and contaminated spoil have the potential to migrate during flood events.

Construction would not alter the existing flood evacuation or management protocols at the site.

Operation

The proposed works would not involve any changes to existing site levels or impervious area. Accordingly, the proposed development is expected to have a negligible effect on floodplain storage.

The tanks and bund may create a small, localised obstruction to shallow surface flows during intense rainfall or flood events. Any local redistribution of surface water would be limited to the immediate tank compound and surrounding hardstand area. Given the small development footprint and minimal change to site levels, the proposed development is not expected to significantly alter overland flow paths or increase flood risk to adjoining properties.

The proposed development does not include an increase in staff numbers or traffic generation and would therefore affect existing flood evacuation or emergency management arrangements for the site.

As outlined in Section 5.1, stormwater and floodwater pose one of the principal risks associated with the proposed high temperature bitumen tanks, that being, loss of containment from bitumen coming into contact with water. To address this risk, the tanks will be raised on legs above the Probable Maximum Flood (PMF) level and tank hold-down arrangements will be as per AS 1940: 2017 *The storage and handling of flammable and combustible liquids*.

Council stormwater infrastructure and a stormwater canal are located along or adjacent to the site boundaries. The proposed development would be designed to avoid impacts to this infrastructure and would not prevent access for inspection, maintenance or repair.

Mitigation and management measures

Potential flooding impacts associated with the proposed development would be mitigated or managed via the following measures:

Construction

- Construction plant, equipment, fuels, chemicals and temporary materials would be located clear of drainage infrastructure, drainage easements and the adjoining stormwater canal where practicable.
- Excavated spoil would be removed from the site progressively avoiding the need for onsite stockpiling.
- Erosion and sediment controls would be installed before ground disturbance and maintained until disturbed areas are stabilised, consistent with *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004) principles.
- The contractor would monitor rainfall forecasts and secure excavations, plant and sediment controls before forecast heavy rainfall where practicable.

Operation

- The tanks will be raised on legs above the Probable Maximum Flood (PMF) level and tank hold-down arrangements will be as per AS 1940: 2017 *The storage and handling of flammable and combustible liquids*
- Access to Council stormwater infrastructure, drainage easements and the adjoining stormwater canal would be maintained.

5.5 Stormwater management and water quality

Existing environment

As outlined in IXOM's Stormwater Management Procedure (Doc Ref. ENV-SYD-PRO-ENV-019-V6, 2024), the entire site is bunded and stormwater runoff is directed to three holding tanks via two gross pollutant trap triple interceptors (one for each sub-catchment of the site). Tank 1 constitutes a 20 kL first-flush stormwater retention system. In the event that all three tanks reach capacity during a rainfall event, water then ponds on-site within the bunded area.

All tanks are subject to controlled discharge to the adjacent stormwater canal only after water quality testing and recording compliant results as per the procedure. Where water quality criteria are not met, further treatment or disposal by a licenced liquid waste contractor is required.

Additional to the site-wide bunding described above, all tanks at the site are bunded to capture potential spills, leaks or tank failures.

Potential impacts

Excavations will temporarily expose contaminated soils at the site, increasing the likelihood of contaminated runoff during construction works. However, the potential for off-site migration of sediment or contaminants from construction activities is low given the whole-of-site site bunding.

As described at Section 2.1, bunding will be constructed around the proposed tanks to capture potential spills, leaks or tank failure. The tank bunding would connect to the site's existing stormwater retention and treatment system, without requirement for any upgrades to the system as there is no change to the catchment area of the retention and treatment system.

No new connections to Council infrastructure are proposed.

Stormwater management requirements of the Canterbury Bankstown DCP are also addressed in Table 3.4.

Mitigation and management measures

Potential water quality impacts associated with operation of the proposed development would be mitigated or managed via the following measures:

- The tank bund would drain to the site's existing first flush stormwater system.
- No uncontrolled discharge from the bunded tank area would occur to the first flush stormwater system or stormwater canal.

5.6 Visual amenity

Existing environment

The site is central within an intensely developed industrial zone. The site is not visible from the closest residential receivers located approximately 300 m from the proposed development at Carrington Street Revesby. Three bitumen storage tanks of the same size and height as those currently proposed were installed in 2018.

Assessment methodology

The site is not subject to CBLEP building height restrictions and there are no DCP height controls that apply. However, DCP requirements in relation to building form and building design have been reviewed in Table 3.4.

A qualitative review of the bulk and scale of the proposed development compared to surrounding development has also been undertaken. Representative viewpoints from the nearest off-site locations on Violet Street and Daisy Street have been assessed using Google Street View (2 April 2026).

Potential impacts

Construction

Construction works involve installing prefabricated tanks using a mobile crane. The installation works are not expected to exceed a single day. Visual impacts associated with the crane and tank installation are therefore minor and temporary in nature. Construction works would be consistent with the surrounding viewshed within the industrial area.

Operation

The site is centrally located within an intensely developed industrial area and the proposed tanks will be the same height as three existing bitumen tanks at the site and comparable in height to buildings on surrounding industrial premises (refer Figure 5.1 – Figure 5.2). The tanks are proposed to be set back about 30 m from the front property boundary and, as per viewpoints 3 – 4 (Figure 5.3 – Figure 5.5), the tanks would be either obstructed or partially obstructed from view from most off-site locations due to existing on-site infrastructure and neighbouring development.

The proposed development is therefore unlikely to result in a significant impact on the visual amenity of the local area.

Outdoor lighting is proposed near ground level at tank fill points and stairs. The lighting would be controlled so as to not affect neighbouring properties or Violet Street road users.

Figure 5.1
Viewpoint 1: 42-50 Violet Street, opposite the site, showing the scale of adjacent development.

Statement of Environmental Effects for DA PR472

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Figure 5.2
Viewpoint 2: 34 Violet Street, opposite the site, showing the scale of adjacent development

Statement of Environmental Effects for DA PR472



Figure 5.3

Viewpoint 3 : 19-21 Daisy Street, looking towards the IXOM Bitumen site. Existing bitumen tanks can just be seen in the background, obscured by trees.

Statement of Environmental Effects for DA PR472



Figure 5.4
Viewpoint 4: 25 Daisy Street, looking towards the IXOM Bitumen site. This viewpoint shows the level of neighboring development obscuring views of the proposed tanks.

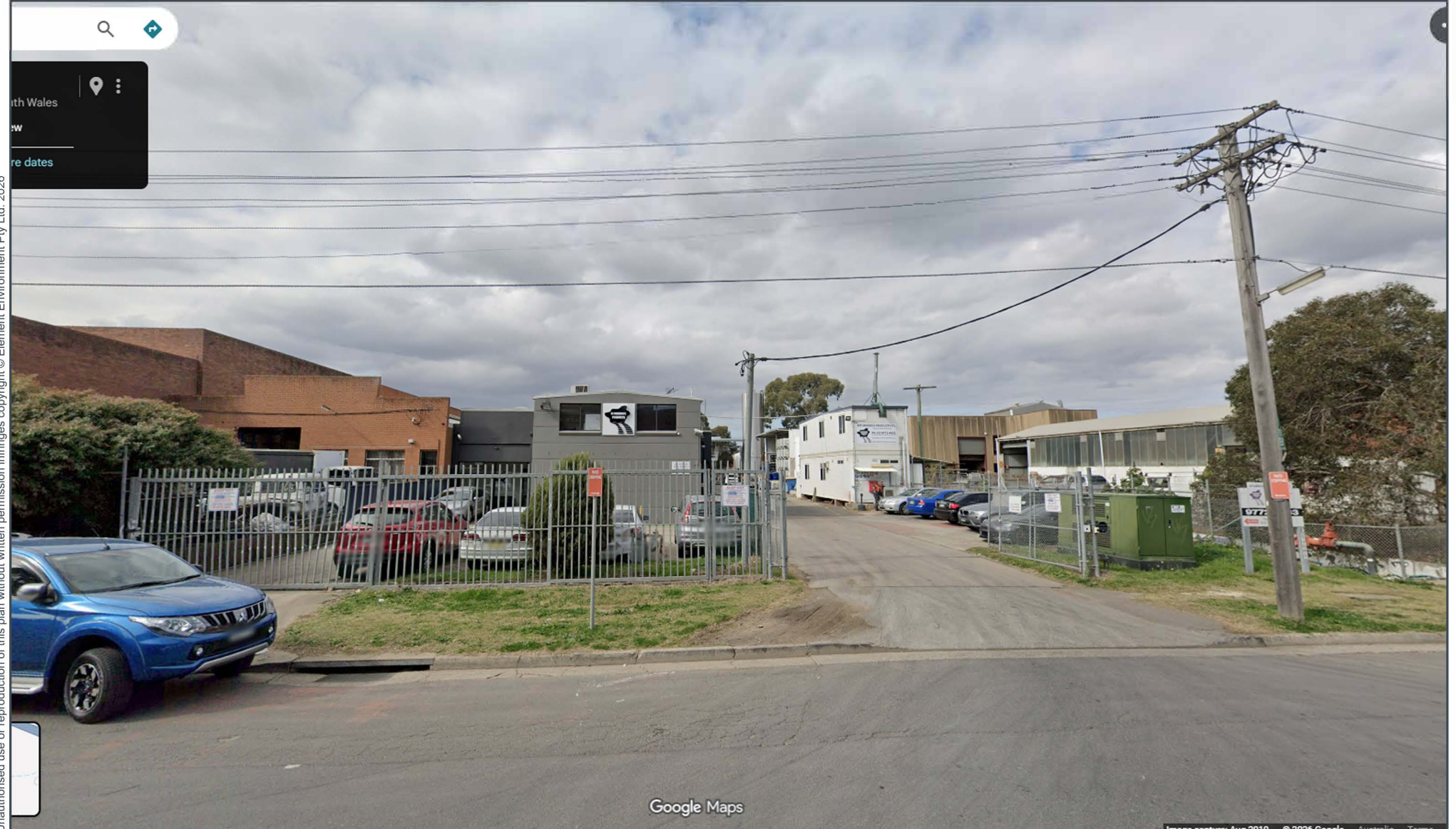
Statement of Environmental Effects for DA PR472



Figure 5.5

Viewpoint 5: View from Violet Street directly in front of the site. The proposed bitumen tanks would be positioned approximately where the existing demountable buildings are. Existing bitumen tanks of the same size are obscured from view behind the private power pole in this photo.

Statement of Environmental Effects for DA PR472



Mitigation and management measures

Despite the low level of visual impact, the proposed development will implement standard design and management measures to ensure visual amenity is maintained:

- The external finish of the proposed tanks would be consistent with other tanks already approved at the site and comply with CBDPC requirements for façades.
- Any maintenance or associated infrastructure would be designed and finished in colours and materials that are consistent with the proposed development and existing industrial character of the site and surrounding development.
- Regular maintenance of infrastructure would be undertaken to prevent visual degradation (e.g. staining, corrosion, or material deterioration).

5.7 Soils, contamination and groundwater

Existing environment

Site contamination

The site has been declared significantly contaminated land and regulated by NSW EPA since 2007. Site remediation and environmental monitoring followed and in 2023 EPA accepted a Voluntary Management Proposal (VMP) to manage residual contamination. In particular, the VMP required bi-monthly groundwater sampling across 16 established monitoring wells to which results are compared to previous years and reported annually to the EPA.

Following the most recent groundwater sampling report in 2025, EPA contacted the site owner (IXOM) in April 2026 to announce their intentions to repeal the declaration of significantly contaminated land, end the VMP and establish an Ongoing Maintenance Order (OMO) which would manage residual risks. The OMO states that any residual contamination at the site is to be managed under a longer-term Environmental Management Plan (EMP). At the time of writing this SEE, the updated arrangements were in draft status and had not come into effect.

Acid Sulfate Soils

The site is mapped as Class 4 land on Acid Sulfate Soils Planning Maps (DLWC, 1998). A recent *Preliminary Waste Classification and Virgin Excavated Natural Material Report* (Alliance, 2026) (Appendix F) assessed acid sulfate soils in accordance with the *National Acid Sulfate Soils Guidance: National acid sulfate soils sampling and identification methods manual* (Water Quality Australia, 2018).

Field pH testing identified that:

- actual acid sulfate soils (AASS) are unlikely to be present
- potential acid sulfate soils (PASS) are highly likely to be present.

The Chromium Reducible Sulfur laboratory analytical results were compared with the adopted action criteria. The results were greater than the relevant action criteria in three of the 10 samples analysed. When considered in the context of the field pH screening results, this indicates that potential acid sulfate soils (PASS) may be present on site at those sampling points.

Based on an assessment of desktop review data, fieldwork observations and laboratory analytical data, the fill material and natural material assessed by the Alliance (2026) report would preliminarily classify as PASS requiring management.

Groundwater

A *Geotechnical Investigation Report: Proposed Truck Turntable - 33 Violet St, Revesby NSW* (Alliance, 2026), which also comments on the proposed tank foundations, identified groundwater seepage in test boreholes at approximately 4 m depth below ground level.

Potential impacts

Construction

The proposed development involves excavations for the concrete pad and piling (see Section 2.1.2). An estimated 6 m³ of potentially contaminated and potential acid sulfate soils and 8 m³ of concrete hardstand will therefore be generated from construction works.

Piling for tank foundations will be to an estimated depth of 5 m based on the geotechnical report (Alliance, 2026) and will likely intercept groundwater (whether seepage or standing groundwater is not confirmed at this stage). Dewatering of potentially contaminated groundwater may therefore be required.

Operation

The site is and will be entirely covered by hardstand and tank bunding, so impacts to soil or groundwater during operation are highly unlikely. Potential impacts to stormwater are assessed in Section 5.5.

Mitigation and management measures

Potential soils, contamination and groundwater impacts associated with the proposed development would be mitigated or managed via the following measures:

- Construction activities, particularly spoil handling, classification and disposal, will be managed in accordance with either the VMP or the EMP, whichever is in place at the time.
- Any dewatered groundwater must be disposed of by a licenced liquid waste contractor (as per IXOM's Stormwater Management Procedure (Doc Ref. ENV-SYD-PRO-ENV-019-V6, 2024)) or follow the VMP or EMP, whichever is in place at the time of construction activities. Groundwater cannot go to stormwater or sewer without testing, classification and permits as required.
- An Acid Sulfate Soils Management Plan prepared in accordance with the *Acid Sulfate Soils Assessment Guidelines* (ASSMAC, 1998) is required prior to construction activities commencing.
- If groundwater is removed during piling, the volume of groundwater taken will be measured or reasonably estimated and recorded. Based on the proposed scale of works, the volume of groundwater take is expected to be well below 3 ML per year exemption. The contractor will confirm whether the *Water Management (General) Regulation 2025* exemption for aquifer interference activities involving 3 ML or less of groundwater applies and will comply with the applicable record-keeping and reporting requirements. If the expected take exceeds the exemption threshold, or if groundwater impacts are greater than anticipated, IXOM will obtain the necessary water licensing advice before continuing works that involve groundwater take.

5.8 Other environmental matters

Other low risk environmental matters are assessed in Table 5.6.

Table 5.6: Other environmental matters

Environmental aspect	Potential impacts and mitigation and management measures
Traffic, transport and access	Construction traffic is estimated to be insignificant – in the order of six light vehicles a day and occasional (typically less than daily) truck and heavy machinery movements. Mitigation and management measures: - Construction traffic would be managed with the facility's existing traffic management system whereby trucks radio the site before arrival so managers can coordinate traffic accordingly. As such, there would be no conflict between construction traffic and operational traffic at the site during works. - Vehicles and machinery associated with construction activities will be parked on-site or on a neighbouring property (through private agreement). There is no increase to operational traffic volumes associated with the proposed development. A swept path assessment (Appendix G) confirms that the largest site design vehicle (19m semi-trailer) can enter, manoeuvre within the site and exit based on the updated site layout.
Heritage	A search of the AHIMS on 29 April 2026 did not identify any known Aboriginal heritage sites within 200 m of the site. A search of the World Heritage List, National Heritage List, Australian Heritage Database, NSW State Heritage Register, State Heritage Inventory, Section 170 Heritage and Conservation Registers and CBLEP on 1 May 2026 did not identify any registered heritage listings within 200 m of the proposed development. The construction of the proposed development involves only minor excavation and would take place on previously disturbed land that has been subject to industrial use since the 1950s. As such, the proposed development is not expected to result in any potential direct or indirect impacts on known or previously unidentified Aboriginal or historic heritage items.
Biodiversity	There is no native vegetation within the subject property. Vegetation at the property is limited to a small lawn area within the front setback on the western boundary.
Waste	Waste streams likely to be generated during construction include: - concrete demolition waste from within the tanks footprint – estimated 8 m³; - excess spoil from pile excavations – estimated 6 m³; - groundwater from dewatering of pile excavations – refer to Section 5.5; - excess construction material wastes, such as concrete, metal and timber offcuts and packaging waste from materials delivered to site. Waste likely to be generated during operation of the tanks is limited to a few hundred kilograms of carbon deposits per annum from tank cleaning maintenance. Mitigation and management measures: - All waste generated by construction and operation of the proposed development will be classified according to <i>Waste Classification Guidelines</i> (NSW EPA, 2014) and disposed of off-site with a licenced waste contractor. Waste management requirements of the Canterbury Bankstown DCP are also addressed in Table 3.4.

CHAPTER 6

CONCLUSION

6 CONCLUSION

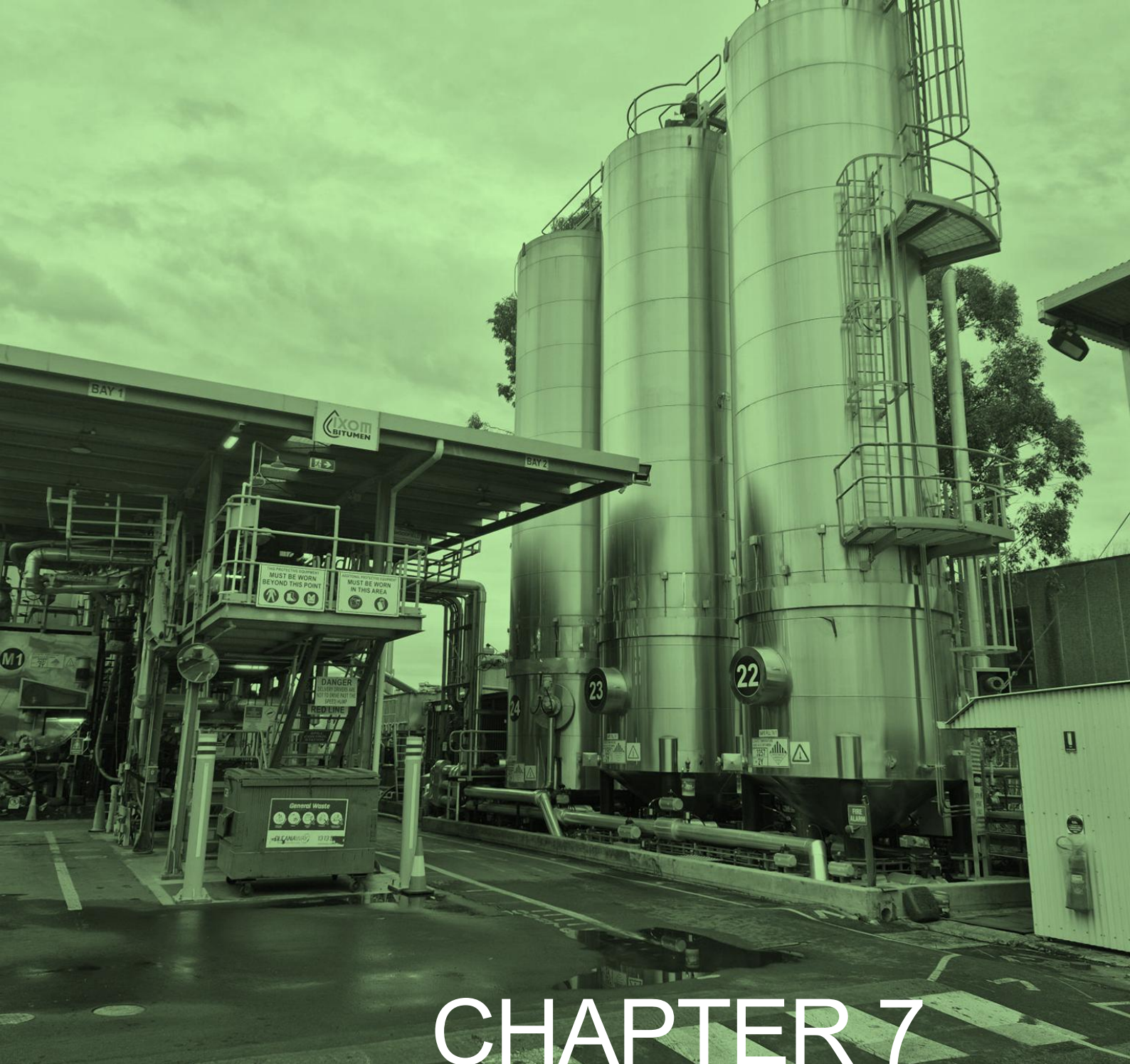
IXOM is seeking approval to install two 80 kL bitumen storage tanks at the site. The proposed development would directly address operational efficiency needs to respond increasing demands of bitumen products.

Element has prepared this SEE to accompany a development application for the proposed development in accordance with Part 4, Division 4.3 of the EP&A Act. The SEE has assessed the proposed development against relevant NSW legislation, environmental planning instruments and Council controls, and has considered the matters for determination under Section 4.15 of the EP&A Act.

The assessment demonstrates that the proposed development is permissible with consent, is appropriate for the site, and would not result in any unacceptable environmental, social or economic impacts.

Overall, the proposed development would result in temporary and localised impacts during construction and negligible operational impacts. The key environmental issue identified are potentially contaminated spoil and groundwater management during construction, and hazards and risks associated with dangerous goods storage during operation of the tanks. Suitable mitigation and management measures have been recommended to address these issues, including management plans regulated by NSW EPA.

The proposed development would not prejudice the future use of land in the locality and is compatible with surrounding land uses. It is consistent with the objectives of the EP&A Act, the relevant provisions of the CBLEP and CBDCP, and applicable SEPPs. The proposed development is therefore recommended for approval.



CHAPTER 7

REFERENCES

7 REFERENCES

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- NSW Acid Sulfate Soils Management Advisory Committee (1998), *Acid Sulfate Soils Assessment Guidelines*, NSW Acid Sulfate Soils Management Advisory Committee.
- NSW DCCEEW (2025a), *Bionet Atlas of NSW Wildlife*, NSW Department of Climate Change, Energy, the Environment and Water.
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- Premier Engineering Services (2016), *Spill Risk Identification and Minimisation Report*, prepared for Bituminous Products Australia Pty Ltd.
- Premier Engineering Services (2005), *Audit and Review of the FHA and HAZOP Against Consent Conditions*, prepared for Bituminous Products Australia Pty Ltd.
- Premier Engineering Pty Ltd (2017), *Hazard Analysis Proposed Tank Installations Bituminous Products Pty Ltd ('PHA Review')*, prepared for Bituminous Products Pty Ltd.
- SCT Consulting (2026), *IXOM Revesby Site Access and Infrastructure Upgrades Traffic Impact Statement*. Prepared for IXOM.
- TfNSW (2022), *Construction Noise Estimator Tool*, Transport for New South Wales.
- Transport for NSW (2017), *Construction Noise and Vibration Strategy*, Transport for New South Wales.

APPENDIX A

CONCEPT DESIGN

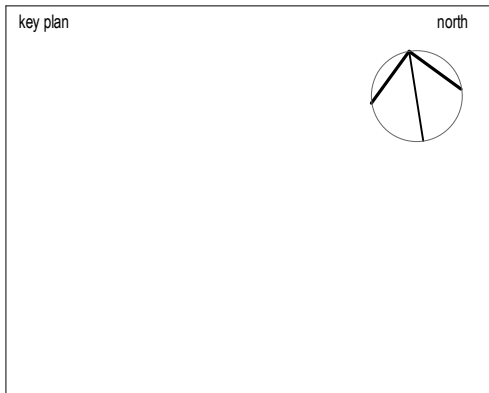
INDICATIVE ONLY - PLAN IS SUBJECT TO A DETAILED SITE SURVEY TO CONFIRM SITE BOUNDARIES, STRUCTURERS, SERVICE AND CONDITIONS.

REAL PROPERTY DESCRIPTION
ADDRESS: 27-33 VIOLET STREET REVESBY NSW
LOT No: A AND C
RP/SP: DP379430
AREA: 5044m²

NOTES:
Only use figured dimensions. Do not scale from drawings.

ABBREVIATIONS

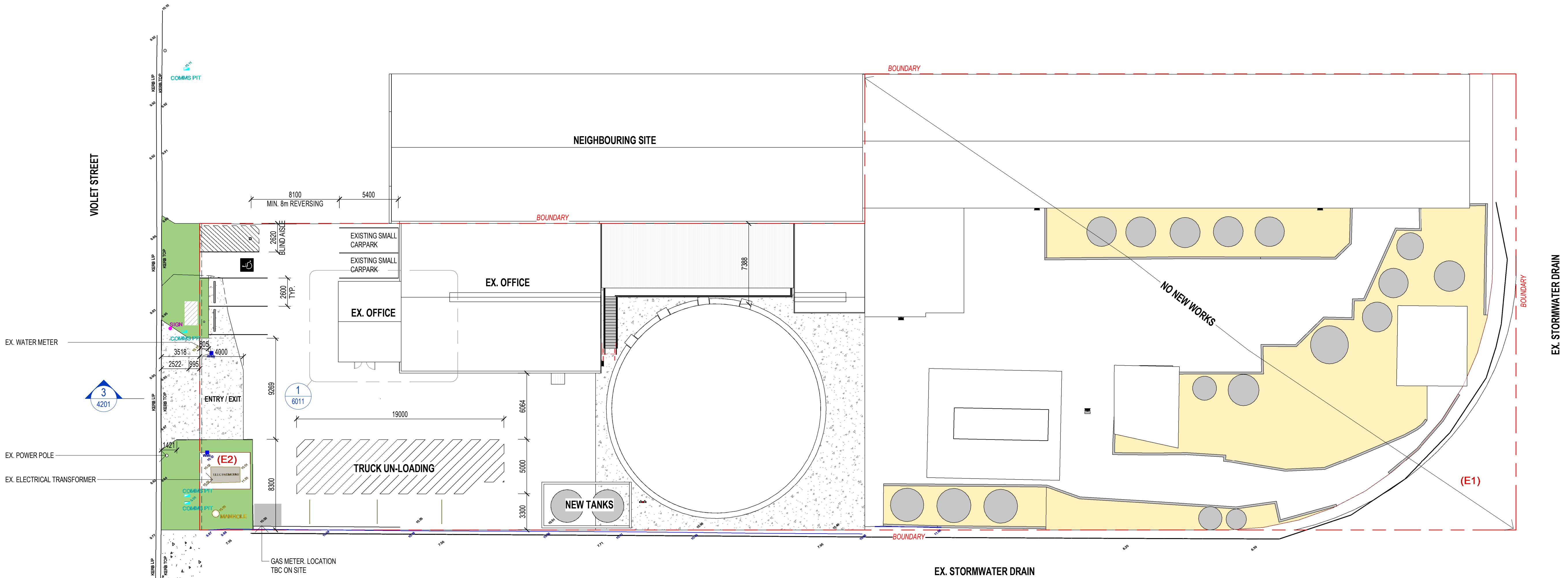
date	no	revision history	chgd
18.05.2026	K	NEW TANKS	LS
18.05.2026	J	INFORMATION	LS
18.05.2026	I	INFORMATION	LS
21.05.2026	H	INFORMATION	LS
18.05.2026	G	INFORMATION	BC
30.04.2026	F	BUILDING APPROVAL	LS
30.04.2026	E	INFORMATION	LS
24.04.2026	D	PRELIMINARY	BC
06.05.2025	C	PRELIMINARY	BC
30.04.2025	B	PRELIMINARY	BC
29.04.25	A	PRELIMINARY	BC



ALTERATIONS TO EXISTING INDUSTRIAL FACILITY
33 VIOLET STREET REVESBY, NSW
FOR IXOM BITUMEN

seriestwo architects
Level 1 / 212 Constance St.
Fortitude Valley QLD 4006
Telephone (07) 3113 4082
hello@seriestwo.com.au
Series Two Architects Pty Ltd

drawing title			
PROPOSED SITE PLAN			
project no:	A2515	scale:	1 : 200
discipline	stage	dwg no	rev no
A	DD	0101	K

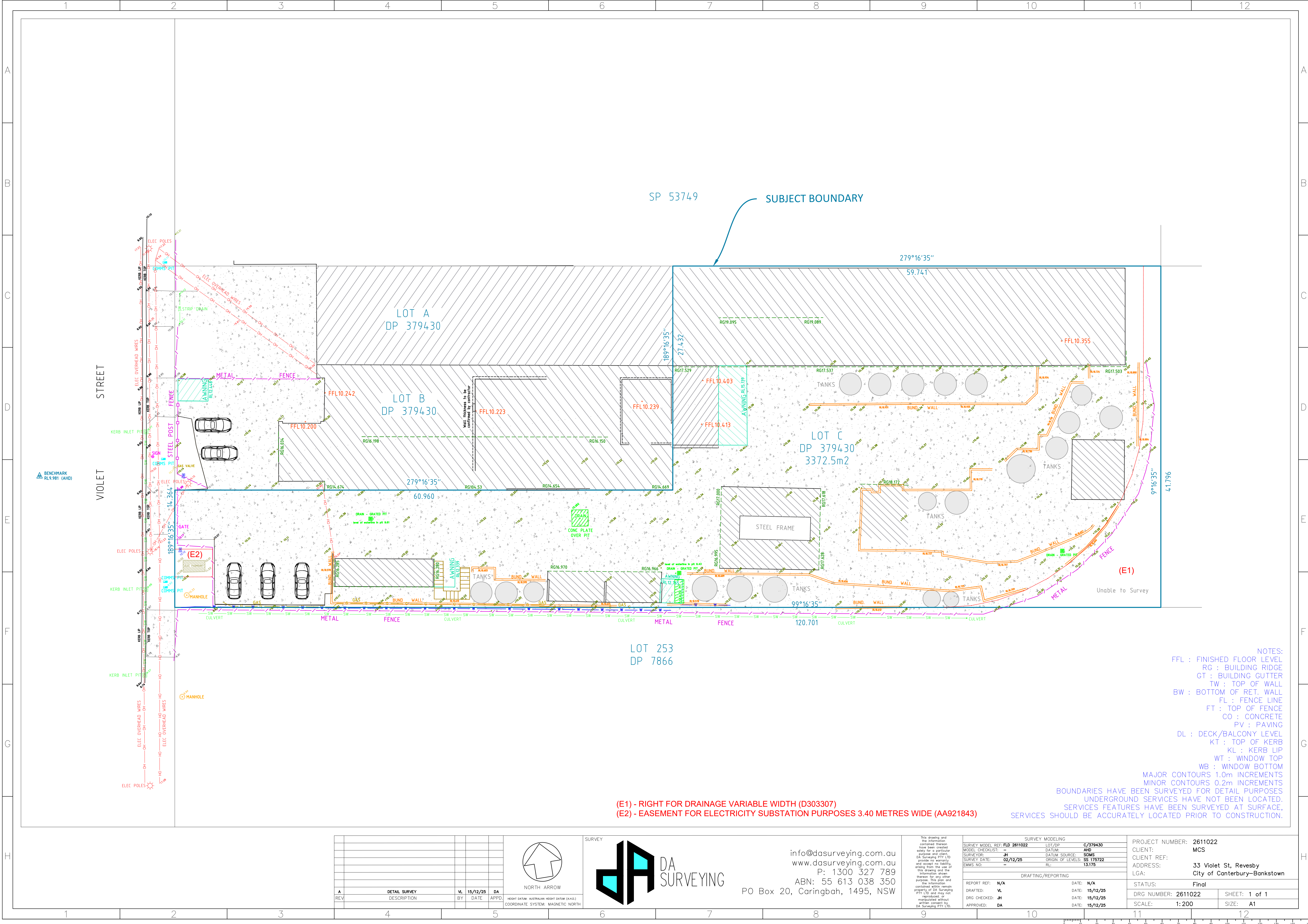


BUILDING APPROVAL
0 2000 4000 6000 8000 10000 20000 40000



APPENDIX B

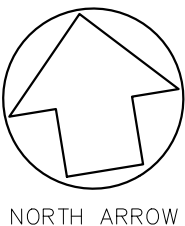
SITE SURVEY



(E1) - RIGHT FOR DRAINAGE VARIABLE WIDTH (D303307)
(E2) - EASEMENT FOR ELECTRICITY SUBSTATION PURPOSES 3.40 METRES WIDE (AA921843)

NOTES:
FFL : FINISHED FLOOR LEVEL
RG : BUILDING RIDGE
GT : BUILDING CUTTER
TW : TOP OF WALL
BW : BOTTOM OF RET. WALL
FL : FENCE LINE
FT : TOP OF FENCE
CO : CONCRETE
PV : PAVING
DL : DECK/BALCONY LEVEL
KT : TOP OF KERB
KL : KERB LIP
WT : WINDOW TOP
WB : WINDOW BOTTOM
MAJOR CONTOURS 1.0m INCREMENTS
MINOR CONTOURS 0.2m INCREMENTS
BOUNDARIES HAVE BEEN SURVEYED FOR DETAIL PURPOSES
UNDERGROUND SERVICES HAVE NOT BEEN LOCATED.
SERVICES FEATURES HAVE BEEN SURVEYED AT SURFACE.
SERVICES SHOULD BE ACCURATELY LOCATED PRIOR TO CONSTRUCTION.

REV	DETAIL SURVEY DESCRIPTION	VL	DATE	DA	APPD.
A		VL	15/12/25	DA	APPD.



info@dasurveying.com.au
www.dasurveying.com.au
P: 1300 327 789
ABN: 55 613 038 350
PO Box 20, Caringbah, 1495, NSW

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SURVEY MODELING		DRAFTING/REPORTING	
SURVEY MODEL REF:	FLD 2611022	DATE:	N/A
MODEL CHECKLIST:	LOT/DP: C/379430 DATE: 15/12/25	DATE:	15/12/25
SURVEYOR:	JH	DATE:	15/12/25
SURVEY DATE:	02/12/25	DATE:	15/12/25
EXAMS NO:	13175	DATE:	15/12/25
REPORT REF:	N/A	DATE:	15/12/25
DRAFTED:	VL	DATE:	15/12/25
DRG CHECKED:	JH	DATE:	15/12/25
APPROVED:	DA	DATE:	15/12/25

PROJECT NUMBER:	2611022
CLIENT:	MCS
CLIENT REF:	
ADDRESS:	33 Violet St, Revesby City of Canterbury-Bankstown
LGA:	
STATUS:	Final
DRG NUMBER:	2611022
SHEET:	1 of 1
SCALE:	1:200
SIZE:	A1

APPENDIX C

CONSULTATION RECORDS

22 April 2026

Jay Conte
Operations Officer
Regulatory Operations
NSW Environment Protection Authority
By email: jay.conte@epa.nsw.gov.au



PO Box 1563
Warriewood
NSW 2102

ABN 45 162
835 083

Project briefing paper: bitumen storage tanks at 33 Violet Street, Revesby

The project

Element Environment (Element) has been engaged by IXOM Operations Pty Ltd (IXOM) to prepare a development application (DA) for the installation of two 80 kL bitumen storage tanks at an existing bitumen production facility owned and operated by IXOM at 33 Violet Street, Revesby NSW (Lot C in DP 379430) (the site). A site plan showing the proposed tank locations along the southern site boundary is included in Appendix A.

The project does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes.

The prefabricated tanks are approximately 3 m in diameter and 14 m height when installed. The tanks would be founded on augered piles and tank farm bunding would be upgraded to accommodate 150% of the volume of the largest tank. Construction is estimated to take approximately 6 months including 3 months of civil works and 3 months of pipe and electrical work. All construction work would be completed during standard daytime construction hours. The estimated development cost is approximately \$1.5 million.

Background

Existing bitumen production activities at 29-33 Violet St, Revesby (lots A and B in DP379430) are scheduled activities licenced under EPL 5267: Petroleum products and fuel production – general (Scale:>10,000-200,000 tonnes per annum capacity).

Ancillary activities include:

- Chemical storage – chemical storage waste generation.
- Chemical storage – petroleum products storage.
- Waste storage – crumbed rubber and pre-processed waste oil.

The site has had development consent for manufacturing of bitumen production facility since 1975 and been the subject of a series of further development applications and modifications since. The most recent of these was a Section 96(2) modification to DA-615/1995/3 which was approved 2 November 2017. The 2017 modification approved installing three 80 kL bitumen storage tanks and one 110 kL oil storage tank at the site. The bitumen storage tanks approved in 2017 and since constructed are the same dimensions as those currently proposed. The current DA will use assessment information from that modification application where suitable.

The site

The site is zoned E4 – General Industrial under the Canterbury-Bankstown Local Environmental Plan 2023 and the following constraints are known:

- There are no building height restrictions for the land use zone under the LEP.
- The site is adjacent to a stormwater canal (concreted) on the southern and eastern boundaries.
- According to Council flood mapping and the Section 10.7 certificate for the property, the site is within the Flood Planning Area and consequently the probable maximum flood (PMF) and is subject to flood related development controls.
- The site is registered on the NSW EPA list of contaminated sites and has been subject of a series of voluntary management proposals (VMP), the most recent and current issued in March 2023.
- The closest residential areas to the site are approximately 300 m to the south and 380 m to the east.

Planning approval pathway

Approval for the two new bitumen storage tanks is being sought by a development application under Part 4 of the NSW EP&A Act, with Council as the consent authority.

The proposed development does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes and is therefore not considered designated development under clause 8 or clause 12 schedule 3 of the Environmental Planning and Assessment Regulation (EP&A Reg).

The proposed development would not exceed the chemical use or storage volumes that trigger designated development under clause 12 or clause 13 schedule 3 of the EP&A Reg.

The proposed development does not require any variation to the existing EPL, or a new EPL, and hence does not trigger designated development under clause 37 schedule 3 of the EP&A Reg and is not integrated development.

The development does not have an estimated development cost of over \$30 million and does not propose to manufacture, store or use dangerous goods in such quantities that constitute the development as a major hazard facility within the meaning of Chapter 6B of the Occupational Health and Safety Regulation 2001. Therefore, the proposed development is not considered state significant development or regionally significant development under clause 10 schedule 1 or clause 2 schedule 6, respectively, of the State Environmental Planning Policy (Planning Systems) 2021.

Separate approval for other upgrades to the existing bitumen facility at 29-33 Violet Street are being sought by complying development certificates, using a private certifier

Proposed environmental assessment

A Statement of Environmental Effects (SEE) is proposed to include the following scope of environmental assessments:

Environmental aspect	Proposed SEE scope
Preliminary Hazard Analysis (PHA)	PHA not required based on SEPP 33 storage thresholds of bitumen product (class 9 of ADG Code). Other risk factors which will be readily managed include adjacent dangerous goods storage, bitumen transfer within the site, truck loading, high bitumen temperatures, flammable vapours, boil over and a previous fire at the site (pre 1995). Element to summarise the 2017 Hazard Analysis.

Environmental aspect	Proposed SEE scope
Stormwater management and water quality	Tank farm bunding will be upgraded to accommodate 150% of the volume of the largest tank. The tank bunding would connect to the site's existing stormwater retention and treatment system, without requirement for any upgrades to the system. There is no change to the catchment area of the retention and treatment system, so the system has available capacity to capture and treat the new tank bunding. Element to qualitatively assess on this basis.
Construction noise assessment	Element to complete a basic construction noise estimation using the Transport for NSW tool to identify number of affected sensitive receivers. A detailed assessment including background noise level monitoring and noise impact modelling would only be completed if it was identified that there are affected sensitive receivers above the Noise Management Levels (NMLs) (as defined by NSW EPA's <i>Interim Construction Noise Guideline</i>).
Operational noise assessment	Sound power levels of two proposed pumps will be reviewed with reference to industrial NMLs and industrial land use context. Basic qualitative assessment (Element)
Flooding	Element review of flood studies, obtain a Stormwater Systems Report (SSR) and identify flood related development controls applying to the site. Qualitative assessment by Element
Contamination assessment	Reference to existing management plans An EMP will be in place as per the OMO from NSW EPA, and will detail the requirements for maintaining worker health and safety and environmental protection (spoil handling, waste classification and disposal) during construction.
Soils, acid sulfate soils and waste classification	These would be investigated by geotechnical studies and suitable management measures developed
Traffic	There is no proposed increase to traffic generation. Swept paths will be reviewed for the updated site layout.
Air quality	Qualitative assessment by Element: Refer to stack emissions being well within NSW criteria and EPL limits. Post-approval, monitor and upgrade scrubber and carbon filter if required.
Community consultation	No community consultation proposed. Confirm with Council.
Agency consultation	Consultation with Council and EPA proposed during preparation of the SEE.
Biodiversity assessment and tree impact assessment	No vegetation is being impacted by the proposal.
Bulk and scale assessment (context analysis)	Qualitative risk assessment based on DCP provisions, local area context and comparable size and scale of surrounding development. Basic qualitative assessment (Element) Architect to advise on potential overshadowing impacts.

Proposed agenda for pre-DA meeting

During a pre-DA meeting with EPA, we would present the project and the proposed scope of environmental assessments for the SEE (see above), and seek EPA feedback.

Kind Regards



Mark Terei
Project Manager and Principal Environmental Planner
Element Environment
0400 664 724
mark.terei@elementenvironment.com.au

Appendices:

Appendix A: Site Plan

INDICATIVE ONLY - PLAN IS SUBJECT TO A DETAILED SITE SURVEY TO CONFIRM SITE BOUNDARIES, STRUCTURES, SERVICE AND CONDITIONS.

REAL PROPERTY DESCRIPTION

ADDRESS: 27-33 VIOLET STREET REVESBY NSW
LOT No: A AND C
RP/SP: DP379430
AREA: 4995m²

NOTES:
Only use figured dimensions. Do not scale from drawings.

ABBREVIATIONS

Date 6	F	PRELIMINARY	BC
21.10.2025	E	PRELIMINARY	BC
20.10.2025	D	PRELIMINARY	BC
06.05.2025	C	PRELIMINARY	BC
30.04.2025	B	PRELIMINARY	BC
29.04.25	A	PRELIMINARY	BC
date	no	revision history	chkd

key plan

north



project/client

CONCEPT DESIGN

27-33 VIOLET STREET
REVESBY, NSW

FOR
MCDONALD CONSTRUCTIONS

seriestwo
architects

Level 1 / 212 Constance St.
Fortitude Valley QLD 4006

Telephone (07) 3113 4082
hello@seriestwo.com.au

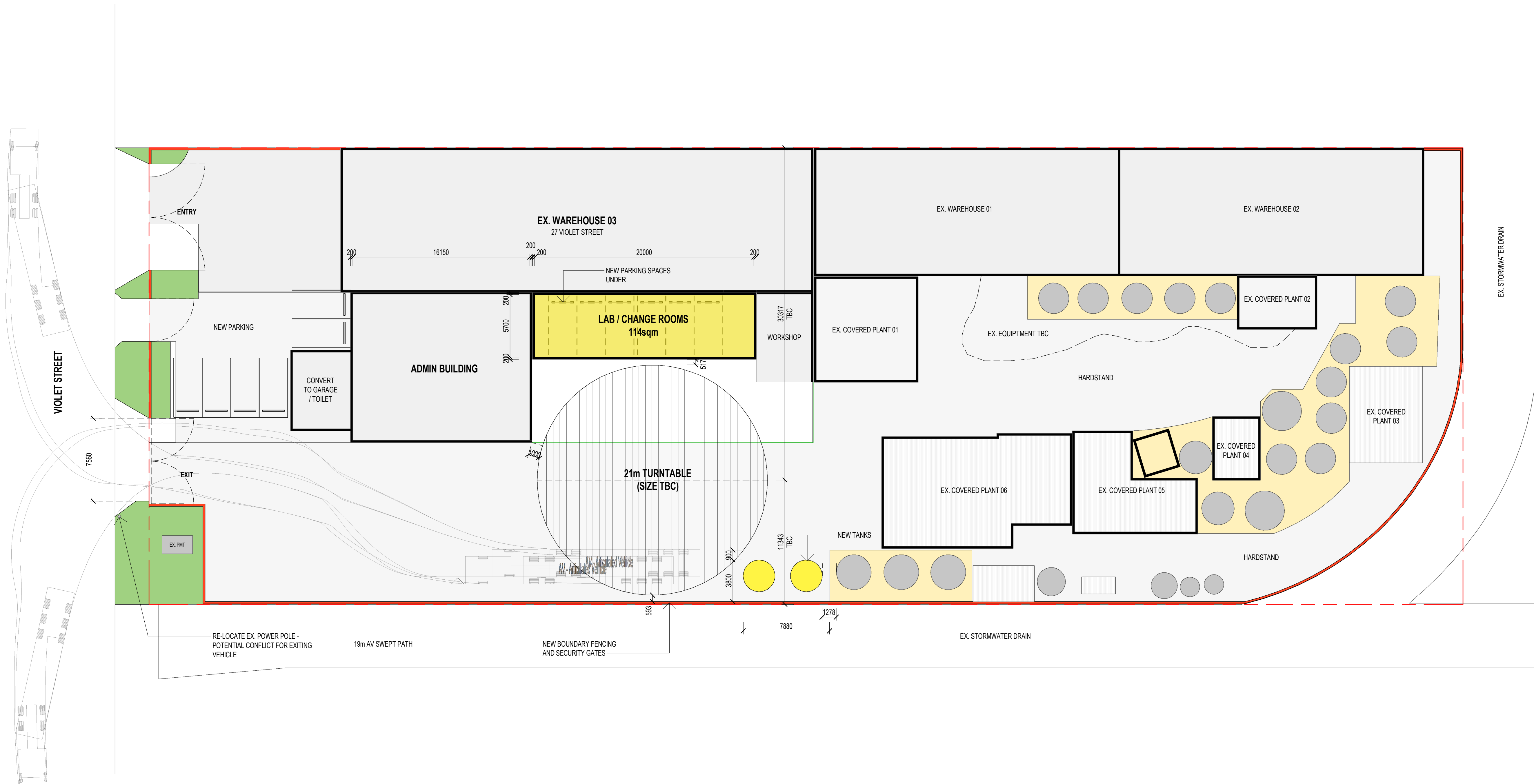
Series Two Architects Pty Ltd

drawing title

SITE PLAN - STAGE 04

project no:		A2515		scale:		1 : 200		@A1	
discipline		stage		dwg no				rev no	
A				0104				F	

22/10/2025 4:28:35 PM F:\000\2515_33 Violet SI Revesby\CAD\Model\A2515_SD.rvt



PRELIMINARY





Re: CM Record: Re: Bituminous Products, Revesby - End of Declaration of Significantly Contaminated Land, and proposed Ongoing Maintenance Order

From Mark Terei <mark.terei@elementenvironment.com.au>

Date Fri 01-May-2026 6:07 PM

To Jay Conte <jay.conte@epa.nsw.gov.au>

Cc danny.coughlan@ixom.com <danny.coughlan@ixom.com>; Joshua Bell <joshua.bell@ixom.com>; PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>

Hi Jay,

Thank you for that feedback. We will be considering those standards and guidelines and their relevance to the project as part of preparation of the Statement of Environmental Effects (SEE).

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA
Planning and Environment
0400 664 724 | mark.terei@elementenvironment.com.au
elementenvironment.com.au | Follow us on LinkedIn 



Element acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present. This email is confidential and may contain legally privileged information. If you are not the intended recipient, you must not disclose or use the information in it. If you have received this email in error, please notify us immediately by return email and delete the email and any related attachments.

Please consider the environment before printing this email.

From: Jay Conte <jay.conte@epa.nsw.gov.au>

Sent: Wednesday, 29 April 2026 11:58 AM

To: Mark Terei <mark.terei@elementenvironment.com.au>

Cc: danny.coughlan@ixom.com <danny.coughlan@ixom.com>; Joshua Bell <joshua.bell@ixom.com>; PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>

Subject: RE: CM Record: Re: Bituminous Products, Revesby - End of Declaration of Significantly Contaminated Land, and proposed Ongoing Maintenance Order

Some people who received this message don't often get email from jay.conte@epa.nsw.gov.au. [Learn why this is important](#)

Hi Mark,

Thank you for your email.

Storage

Please note the following documents may apply to the bitumen storage:

- AS1940:2017 *The Storage and Handling of Flammable and Combustible Liquids*
- *Storing and Handling Liquids: Environmental Protection Participants Manual* (DECC, 2009) available at <https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/compliance-audit-program/storing-and-handling-liquids-trainers-manual>

Air

Please note the following may apply to any air and/or odour impact assessment that may be required:

- *NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* available at <https://www.epa.nsw.gov.au/Your-environment/Air/industrial-emissions/Approved-methods-for-the-modelling-and-assessment-of-air-pollutants>
- [Part 5 of the Protection of the Environment Operations \(Clean Air\) Regulation 2022](#)

Noise

Please note the following may apply for construction and/or operational noise:

- *Department of Environment & Climate Change NSW Interim Construction Noise Guideline* available at <https://www.epa.nsw.gov.au/sites/default/files/09265cng.pdf>
- *NSW EPA Noise Policy for Industry 2017*, available at <https://www.epa.nsw.gov.au/sites/default/files/17p0524-noise-policy-for-industry.pdf>
- *Department of Environment and Conservation NSW Assessing Vibration: a technical guideline* available at <https://www.epa.nsw.gov.au/sites/default/files/vibrationguide0643.pdf>

Please note the licence may be required to be varied should the development application be approved by Council.

Please send all future correspondence regarding new matters and enquiries to info@epa.nsw.gov.au, as this will ensure it is allocated to the appropriate officer/team for actioning.

Kind regards,
Jay

Jay Conte (*they/them*)

Operations Officer

Regulatory Operations

NSW Environment Protection Authority

D 02 6983 4919 | M 0436 436 690



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work.

As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past, present and emerging.

I work on Dharawal Country.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Wednesday, 22 April 2026 5:43 PM

To: Jay Conte <jay.conte@epa.nsw.gov.au>

Cc: Danny Coughlan <danny.coughlan@ixom.com>; Joshua Bell <joshua.bell@ixom.com>; PR472 <PR472@elementenvironment.com.au>; Harri Maylor <harri@elementenvironment.com.au>

Subject: CM Record: Re: Bituminous Products, Revesby - End of Declaration of Significantly Contaminated Land, and proposed Ongoing Maintenance Order

Good afternoon Jay,

I am working with IXOM Bitumen to prepare a development application for two new bitumen storage tanks at this property. The DA will be lodged with Canterbury Bankstown Council. A briefing letter (same as which we sent to Council 27 March 2026) is attached for your information. My review of the existing EPL 5267 suggests that the proposed development does not require any variation to the existing EPL, or a new EPL.

We understand that an OMO requiring an EMP will replace the VMP in terms of managing residual site contamination risk, per the updates provided by EPA below. Given this, and any other interest EPA may have with regard to this DA, would EPA like to meet with us to gain an appreciation of the DA, or provide any comments in lieu of a meeting?

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

0400 664 724 | mark.terei@elementenvironment.com.au

elementenvironment.com.au | Follow us on LinkedIn 



Element acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present. This email is confidential and may contain legally privileged information. If you are not the intended recipient, you must not disclose or use the information in it. If you have received this email in error, please notify us immediately by return email and delete the email and any related attachments.

Please consider the environment before printing this email.

From: Joshua Bell <joshua.bell@ixom.com>

Sent: Tuesday, April 07, 2026 12:01 PM

To: Mark Terei <mark.terei@elementenvironment.com.au>; Jacob Vickers <jacob@elementenvironment.com.au>

Cc: Danny Coughlan <danny.coughlan@ixom.com>

Subject: FW: Bituminous Products, Revesby - End of Declaration of Significantly Contaminated Land, and proposed Ongoing Maintenance Order

Hi Jacob and Mark,

Please find attached correspondence with EPA NSW.

Joshua Bell

National Technical Manager - IXOM Bitumen

M: 61 488 777 757

Joshua.bell@ixom.com | www.ixom.com



IXOM Bitumen sales & purchase of products or services from your organisation will be subject to Bituminous Products Pty Ltd terms and conditions [shown on Bituminous Products' website accessible by clicking on the following link [Terms and Conditions - Bituminous Products](#)]

From: Jay Conte <jay.conte@epa.nsw.gov.au>

Sent: Tuesday, 7 April 2026 11:40 AM

To: Joshua Bell <joshua.bell@ixom.com>

Subject: Bituminous Products, Revesby - End of Declaration of Significantly Contaminated Land, and proposed Ongoing Maintenance Order

Caution: This is an external email. Stop and think before responding, clicking on links or opening attachments.

Hi Joshua,

As discussed, please find attached a letter regarding the end of Declaration of Significantly Contaminated Land and the proposed Ongoing Maintenance Order.

Could you please provide comments on all three *draft* notices by COB 21st April 2026:

- s17(7) Notice to end the Voluntary Management Proposal (VMP);
- s44 Notice to end the declaration
- s28 Ongoing Maintenance Order

In relation to the Ongoing Maintenance Order requirements, please see the following guide:

<https://www.epa.nsw.gov.au/sites/default/files/22p3473-emps-for-contaminated-land-practice-note.pdf>.

Please reach out if you have any questions, and we're also happy to set up a meeting to discuss further.

Could you please acknowledge receipt of this email.

Kind regards,
Jay

Jay Conte (*they/them*)
Operations Officer
Regulatory Operations
NSW Environment Protection Authority
D 02 6983 4919 | M 0436 436 690



www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the Traditional Custodians of the land, waters and sky where we work.

As part of the world's oldest surviving cultures we pay our respect to Aboriginal Elders past, present and emerging.

I work on Dharawal Country.



Report pollution and environmental incidents 131 555 or +61 2 9995 5555

27 March 2026

Development Team
Canterbury Bankstown Council
Online via Council's pre-DA advice request form



PO Box 1563
Warriewood
NSW 2102

ABN 45 162
835 083

Project briefing paper: bitumen storage tanks at 33 Violet Street, Revesby

The project

Element Environment (Element) has been engaged by IXOM Operations Pty Ltd (IXOM) to prepare a development application (DA) for the installation of two 80 kL bitumen storage tanks at an existing bitumen production facility owned and operated by IXOM at 33 Violet Street, Revesby NSW (Lot C in DP 379430) (the site). A site plan showing the proposed tank locations along the southern site boundary is included in Appendix A.

The project does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes.

The prefabricated tanks are approximately 3 m in diameter and 14 m height when installed. The tanks would be founded on augered piles and tank farm bunding would be upgraded to accommodate 150% of the volume of the largest tank. Construction is estimated to take approximately 6 months including 3 months of civil works and 3 months of pipe and electrical work. All construction work would be completed during standard daytime construction hours. The estimated development cost is approximately \$1.5 million.

Background

Existing bitumen production activities at 29-33 Violet St, Revesby (lots A and B in DP379430) are scheduled activities licenced under EPL 5267: Petroleum products and fuel production – general (Scale:>10,000-200,000 tonnes per annum capacity).

Ancillary activities include:

- Chemical storage – chemical storage waste generation.
- Chemical storage – petroleum products storage.
- Waste storage – crumbed rubber and pre-processed waste oil.

The site has had development consent for manufacturing of bitumen production facility since 1975 and been the subject of a series of further development applications and modifications since. The most recent of these was a Section 96(2) modification to DA-615/1995/3 which was approved 2 November 2017. The 2017 modification approved installing three 80 kL bitumen storage tanks and one 110 kL oil storage tank at the site. The bitumen storage tanks approved in 2017 and since constructed are the same dimensions as those currently proposed. The current DA will use assessment information from that modification application where suitable.

The site

The site is zoned E4 – General Industrial under the Canterbury-Bankstown Local Environmental Plan 2023 and the following constraints are known:

- There are no building height restrictions for the land use zone under the LEP.
- The site is adjacent to a stormwater canal (concreted) on the southern and eastern boundaries.
- According to Council flood mapping and the Section 10.7 certificate for the property, the site is within the Flood Planning Area and consequently the probable maximum flood (PMF) and is subject to flood related development controls.
- The site is registered on the NSW EPA list of contaminated sites and has been subject of a series of voluntary management proposals (VMP), the most recent and current issued in March 2023.
- The closest residential areas to the site are approximately 300 m to the south and 380 m to the east.

Planning approval pathway

Approval for the two new bitumen storage tanks is being sought by a development application under Part 4 of the NSW EP&A Act, with Council as the consent authority.

The proposed development does not propose any changes to site operations, approved production rates, chemical substances storage, operating hours or traffic volumes and is therefore not considered designated development under clause 8 or clause 12 schedule 3 of the Environmental Planning and Assessment Regulation (EP&A Reg).

The proposed development would not exceed the chemical use or storage volumes that trigger designated development under clause 12 or clause 13 schedule 3 of the EP&A Reg.

The proposed development does not require any variation to the existing EPL, or a new EPL, and hence does not trigger designated development under clause 37 schedule 3 of the EP&A Reg and is not integrated development.

The development does not have an estimated development cost of over \$30 million and does not propose to manufacture, storage or use dangerous goods in such quantities that constitute the development as a major hazard facility within the meaning of Chapter 6B of the Occupational Health and Safety Regulation 2001. Therefore, the proposed development is not considered state significant development or regionally significant development under clause 10 schedule 1 or clause 2 schedule 6, respectively, of the State Environmental Planning Policy (Planning Systems) 2021.

Separate approval for other upgrades to the existing bitumen facility at 29-33 Violet Street are being sought by complying development certificates, using a private certifier

Proposed environmental assessment

A Statement of Environmental Effects (SEE) is proposed to include the following scope of environmental assessments:

Environmental aspect	Proposed SEE scope
Preliminary Hazard Analysis (PHA)	PHA not required based on SEPP 33 storage thresholds of bitumen product (class 9 of ADG Code). Other risk factors which will be readily managed include adjacent dangerous goods storage, bitumen transfer within the site, truck loading, high bitumen temperatures, flammable vapours, boil over and a previous fire at the site (pre 1995). Advice to be sought from Council.

Environmental aspect	Proposed SEE scope
Construction noise assessment	Yes – Element to complete a basic construction noise estimation using the Transport for NSW tool to identify number of affected receivers. A detailed assessment including background noise level monitoring and noise impact modelling would only be completed if it was identified that there are affected receivers above the Noise Management Levels (NMLs) (as defined by NSW EPA's <i>Interim Construction Noise Guideline</i>).
Operational noise assessment	No – The tanks will produce very little noise during operation. Sound power levels of two proposed pumps will be reviewed.
Flooding	Flood related development controls apply to the site and will be considered. Confirm requirements with Council
Contamination assessment	No – adopt existing voluntary management proposal (VMP) (which is recognised by the Section 10.7(2) property certificate) Confirm with Council
Acid sulfate soils and waste classification	These would be investigated by geotechnical studies and suitable management measures developed
Traffic	No – there is no proposed increase to traffic generation. Swept paths will be reviewed for updated site layout.
Air quality	Yes – assessment of tank emissions and odour, with respect to EPL limits and NSW policy and guidelines.
Community consultation	Confirm requirements with Council
Agency consultation	Consultation with EPA proposed Would Council like to be a part of those meetings?
Biodiversity assessment and tree impact assessment	No vegetation is being impacted by the proposal
Bulk and scale assessment (context analysis)	Element would review the bulk and scale of the tanks, material finishes and colour, sight lines and potential overshadowing impacts, privacy, visual amenity, ventilation and spatial separation in the context of neighbouring properties, the streetscape and LEP and DCP requirements.

Proposed agenda for pre-DA meeting

During a pre-DA meeting with Council we would like to review the proposed scope of environmental assessments for the SEE (see above) and seek Council advice.

Kind Regards



Mark Terei
Project Manager and Principal Environmental Planner
Element Environment
0400 664 724
mark.terei@elementenvironment.com.au

INDICATIVE ONLY - PLAN IS SUBJECT TO A DETAILED SITE SURVEY TO CONFIRM SITE BOUNDARIES, STRUCTURERS, SERVICE AND CONDITIONS.

REAL PROPERTY DESCRIPTION
ADDRESS: 27-33 VIOLET STREET REVESBY NSW
LOT No: A AND C
RP/SP: DP379430
AREA: 4995m²

NOTES:
Only use figured dimensions. Do not scale from drawings.

ABBREVIATIONS

Date	By	Description	Rev
21.10.2025	F	PRELIMINARY	BC
20.10.2025	E	PRELIMINARY	BC
20.10.2025	D	PRELIMINARY	BC
06.05.2025	C	PRELIMINARY	BC
30.04.2025	B	PRELIMINARY	BC
20.04.25	A	PRELIMINARY	BC
date	no	revision history	chgd



project client
CONCEPT DESIGN

**27-33 VIOLET STREET
REVESBY, NSW**

FOR
MCDONALD CONSTRUCTIONS

**seriestwo
architects**

Level 1 / 212 Constance St.
Fortitude Valley QLD 4006

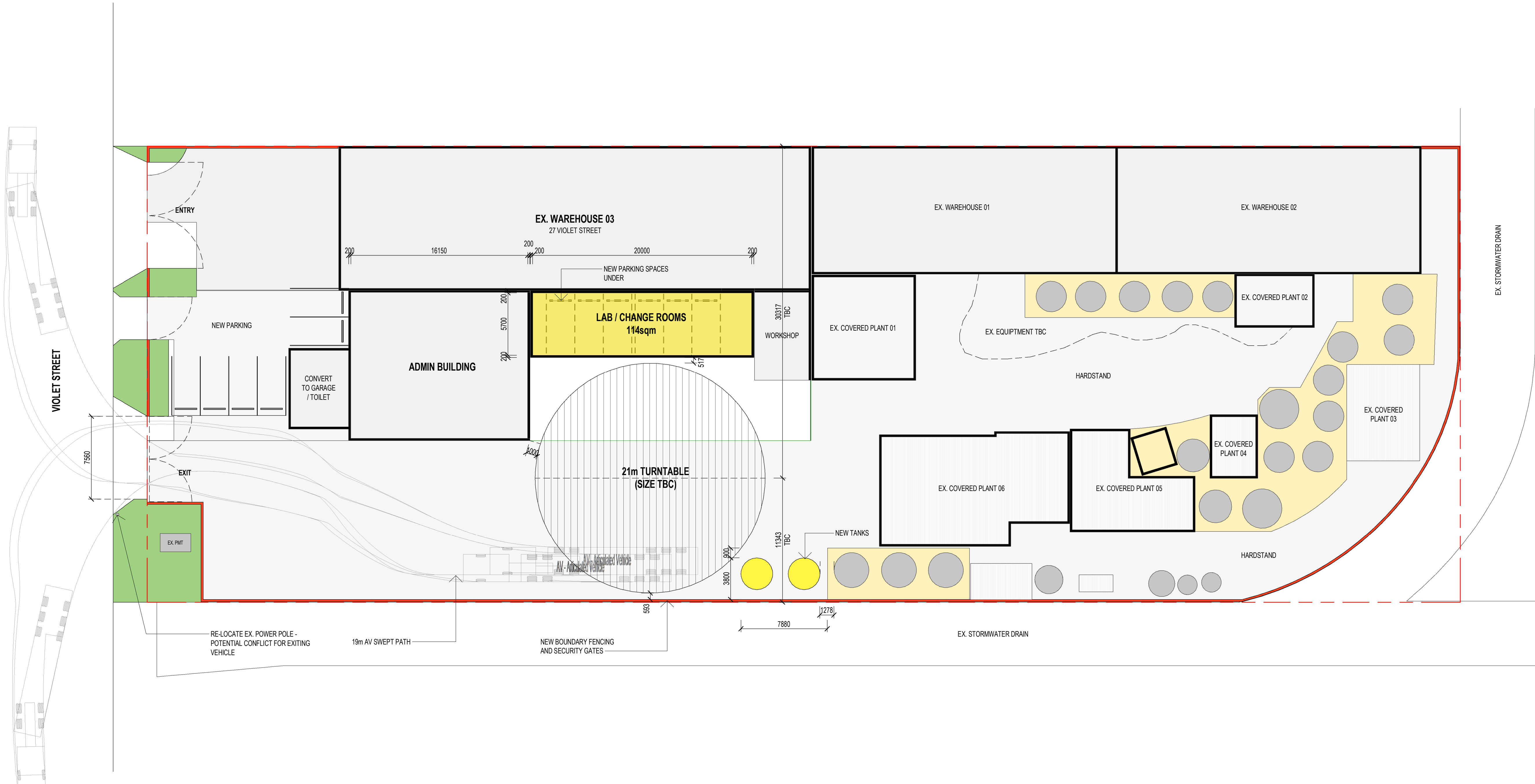
Telephone (07) 3113 4082
hello@seriestwo.com.au

Series Two Architects Pty Ltd

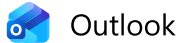
drawing title
SITE PLAN - STAGE 04

project no:	A2515	scale:	1 : 200	@A1
discipline	stage	dwg no	rev no	
A		0104	F	

F:\40002515_33 Violet St Reveby\CAD\Model\A2515_S0.rvt 22/10/2025 4:28:35 PM



0 5 10 15 20 25 50 100
PRELIMINARY



Outlook

RE: Pre-DA 11/2026 - bitumen storage tanks at 33 Violet Street, Revesby

From Zena Ayache <Zena.Ayache@cbccity.nsw.gov.au>

Date Wed 06-May-2026 2:25 PM

To Mark Terei <mark.terei@elementenvironment.com.au>

Cc PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>; Joshua Bell <joshua.bell@ixom.com>; Danny Coughlan <danny.coughlan@ixom.com>

Hi Mark,

Thankyou for the response regarding my earlier comments.

In relation to the proposed installation of the two (2) 80 KL bitumen storage tanks, I confirm Council raises no issues. However, it is noted that the submitted plans provide upgrade works that are not included as part of this application. Council provides no comment in relation to these works as they are not included or part of the subject Pre-DA Application.

Notwithstanding the above, should a DA be submitted for installation of the proposed storage tanks, a Preliminary Acid Sulfate Soils Assessment is required as the proposed development is located within areas mapped as Class 4 Acid Sulfate Soils. This assessment must be carried out by a suitably qualified Environmental Consultant in accordance with the 'Acid Sulfate Soils Assessment Guidelines' (NSW Acid Sulfate Soils Management Advisory Committee, 1998).

Also, as the proposed development has an existing EPA licence for scheduled activities [EPL 5267: Petroleum products and fuel production – general (Scale:>10,000-200,000 tonnes per annum capacity)], the development application will be referred to EPA for the provision of General Terms of Approval (GTAs).

I hope this Pre-DA advice assists you with your proposal and future plans for the site.

Kind Regards,



Zena Ayache - Executive Planner

T 02 9789 9449

E Zena.Ayache@cbccity.nsw.gov.au

www.cbcity.nsw.gov.au



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From: Mark Terei <mark.terei@elementenvironment.com.au>
Sent: Wednesday, 6 May 2026 12:01 PM
To: Zena Ayache <Zena.Ayache@cbccity.nsw.gov.au>
Cc: PR472 <PR472@elementenvironment.com.au>; Harri Major <harri@elementenvironment.com.au>; Joshua Bell <joshua.bell@ixom.com>; Danny Coughlan <danny.coughlan@ixom.com>
Subject: Re: Pre-DA 11/2026 - bitumen storage tanks at 33 Violet Street, Revesby

Good morning Zena,

As per the briefing letter, separate approval for other upgrades to the existing bitumen facility at 29-33 Violet Street are being sought by complying development certificates, using a private certifier. This DA relates only to two new tanks. The proposed scope of assessment has been outlined in the briefing letter to Council and Council's feedback or a meeting to discuss would be appreciated.

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA
 Planning and Environment
 0400 664 724 | mark.terei@elementenvironment.com.au
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From: Zena Ayache <Zena.Ayache@cbccity.nsw.gov.au>
Sent: Wednesday, 6 May 2026 11:51 AM
To: Mark Terei <mark.terei@elementenvironment.com.au>
Subject: RE: Pre-DA 11/2026 - bitumen storage tanks at 33 Violet Street, Revesby

You don't often get email from zena.ayache@cbccity.nsw.gov.au. [Learn why this is important](#)

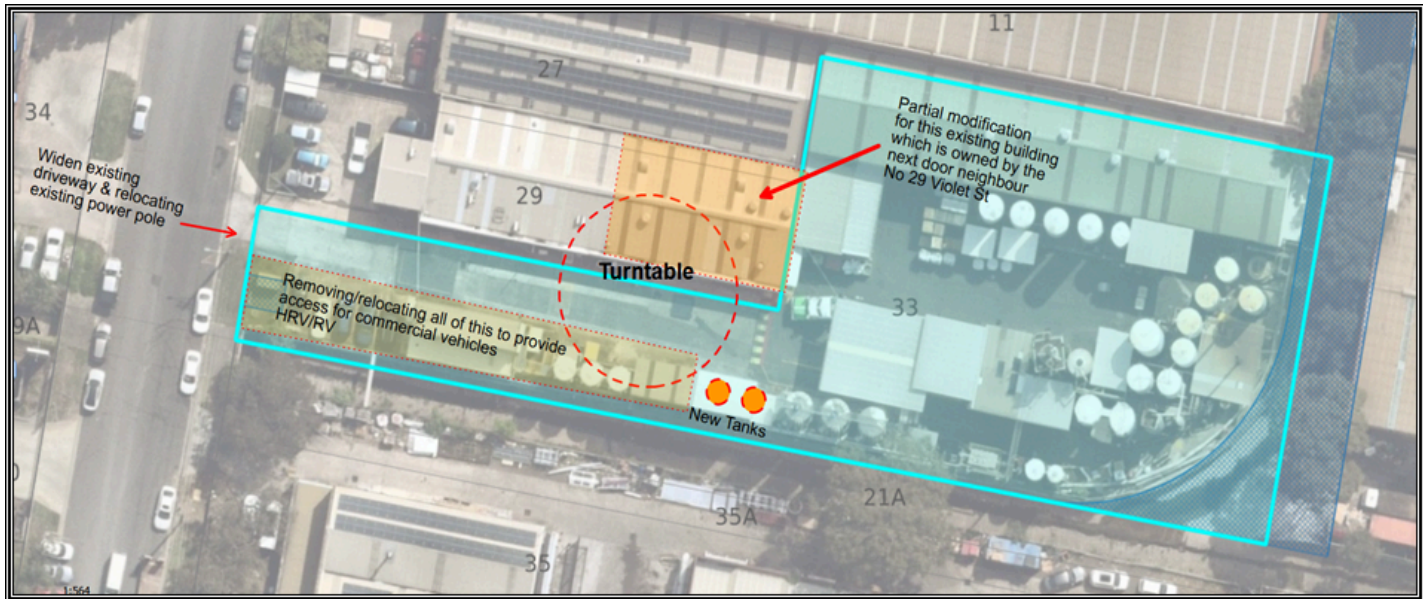
Hi Mark,

I confirm Council has reviewed the proposal and is unable to progress with a Pre-DA meeting due to the following issues:

1. Our Development Engineer has reviewed the proposal and advised that they are unable to provide any advice because there is discrepancy between what is proposed (Installation of 80 KL bitumen storage tanks) **AND** what is shown in the site plan.

On the provided plan the following works appear to be proposed (please see snippet below for illustration):

- a. Installation of a Turntable (21m Diameter) for RV commercial vehicles manoeuvring.
- b. Widening existing vehicle access and the relocation of power pole.
- c. Removing/relocating existing structures and parking spaces along the southern boundary line to make appropriate space for commercial vehicle access.
- d. Modification of existing building (not part of subject site) as it appears to be within the adjoining neighbouring property No. 29 Violet Street.



To enable Council to adequately review the subject application, consistent, accurate and complete information of the works proposed are to be provided. Should you wish to submit revised plans for Council's review, we provide you until **Friday, 15 April 2026** to submit amended plans and documentation that address the abovementioned issues.

Should Council not receive the requested information by the specified date, Council will finalise and close this Pre-DA Application.

In the meantime, should you have any enquires regarding this matter, please do not hesitate to contact me.

Kind Regards,



Zena Ayache - Executive Planner
 T 02 9789 9449
 E Zena.Ayache@cbc.city.nsw.gov.au
www.cbc.city.nsw.gov.au





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From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Monday, 4 May 2026 2:30 PM

To: Zena Ayache <Zena.Ayache@cbc.city.nsw.gov.au>

Cc: PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>; Joshua Bell <joshua.bell@ixom.com>; Danny Coughlan <danny.coughlan@ixom.com>

Subject: Pre-DA 11/2026 - bitumen storage tanks at 33 Violet Street, Revesby

Good afternoon Zena,

Thanks for your call on 15 April to introduce yourself and provide an update on our pre-DA lodgement meeting request. I haven't heard anything since. Could you please provide an update?

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

0400 664 724 | mark.terei@elementenvironment.com.au

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From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Monday, April 13, 2026 4:00 PM

To: Chakib.Lawand@cbc.city.nsw.gov.au <chakib.lawand@cbc.city.nsw.gov.au>

Cc: PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>; Joshua Bell <joshua.bell@ixom.com>; Danny Coughlan <danny.coughlan@ixom.com>

Subject: Re: New submission for Pre-DA Lodgement Advice - bitumen storage tanks at 33 Violet Street, Revesby

Good afternoon Chakib,

We are still waiting to hear from Council about a pre-DA meeting since submitting our original request on 5 March, and re-submitting with a briefing letter two weeks ago on 30 March. Council's input and advice is important to us, and we are waiting

to hear back from Council and arrange a meeting before we proceed with preparation of our Statement of Environmental Effects (SEE). Could you please give me a call back at your earliest convenience, or let me know if there is an assigned Planner who I could make arrangement with?

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

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From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Wednesday, April 08, 2026 10:33 AM

To: Chakib.Lawand@cbc.city.nsw.gov.au <chakib.lawand@cbc.city.nsw.gov.au>

Cc: PR472 <PR472@elementenvironment.com.au>; Harri Mayjor <harri@elementenvironment.com.au>; Danny Coughlan <danny.coughlan@ixom.com>; Joshua Bell <joshua.bell@ixom.com>; Jacob Vickers <jacob@elementenvironment.com.au>

Subject: Re: New submission for Pre-DA Lodgement Advice - bitumen storage tanks at 33 Violet Street, Revesby

Good morning Chakib,

I tried calling this morning and left a message. I'm following up after our last conversation on 11 March (see below). We have since prepared a comprehensive briefing letter for Council and lodged it with a new request for pre-DA lodgement advice on Monday 30 March (last week). We haven't heard anything since and would much appreciate organising a pre-DA meeting with Council as soon as possible so that we can present our proposed SEE scope, gain any advice from Council, and move forward with the DA.

Please give me a call back when you are able.

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

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From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Wednesday, March 11, 2026 3:46 PM

To: Harri Mayjor <harri@elementenvironment.com.au>

Cc: PR472 <PR472@elementenvironment.com.au>; Jacob Vickers <jacob@elementenvironment.com.au>; Neville Hattingh <neville@elementenvironment.com.au>

Subject: Re: New submission for Pre-DA Lodgement Advice - bitumen storage tanks at 33 Violet Street, Revesby

Hi Harri,

Just FYI, I spoke with Chakib at Council re tank DA pre-DA meeting. We need to prepare a short letter outlining more details of the proposal, which I am happy to do. And then they will meet with us about 2 weeks later, and they will issue meeting minutes if asked.

Regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

0400 664 724 | mark.terei@elementenvironment.com.au
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From: Mark Terei <mark.terei@elementenvironment.com.au>

Sent: Friday, March 06, 2026 5:03 PM

To: Chakib.Lawand@cbccity.nsw.gov.au <Chakib.Lawand@cbccity.nsw.gov.au>

Cc: Harri Mayjor <harri@elementenvironment.com.au>; PR472 <PR472@elementenvironment.com.au>; Jacob Vickers <jacob@elementenvironment.com.au>; Neville Hattingh <neville@elementenvironment.com.au>; joshua.bell@ixom.com <joshua.bell@ixom.com>; danny.coughlan@ixom.com <danny.coughlan@ixom.com>

Subject: Re: New submission for Pre-DA Lodgement Advice - bitumen storage tanks at 33 Violet Street, Revesby

Good afternoon Chakib,

We have tried calling back today. Could we please arrange a time for a Teams meeting or phone call early next week, preferably Monday? Please let me know your availability.

Also please find attached our project enquiry for reference.

Kind regards,



Mark Terei

Principal Environmental Consultant - CEnvP-IA

Planning and Environment

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From: Duty Planner <DutyPlanner@cbccity.nsw.gov.au>
Sent: Friday, 6 March 2026 10:16 AM
To: Harri Mayjor <harri@elementenvironment.com.au>
Cc: Duty Planner <DutyPlanner@cbccity.nsw.gov.au>
Subject: RE: New submission for Pre-DA Lodgement Advice

You don't often get email from dutyplanner@cbccity.nsw.gov.au. [Learn why this is important](#)

Hi,

I have attempted to contact yesterday and today.

Please contact me to discuss your pre-DA meeting request.

Kind regards

Chakib

--



CANTERBURY BANKSTOWN

Chakib Lawand - Team Leader Development SystemsT 02 [9707 9815](tel:0297079815) M 0475 708 912E Chakib.Lawand@cbc.city.nsw.gov.auwww.cbc.city.nsw.gov.au**@ourcbc**
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From: Snapforms Notifications <no-reply@snapforms.com.au>**Sent:** Thursday, 5 March 2026 2:40 PM**To:** Duty Planner <DutyPlanner@cbc.city.nsw.gov.au>**Subject:** New submission for Pre-DA Lodgement Advice

You have received a new submission for PreDA.

Salutation: Mr**Family name (or company name):** Mayjor**Given names (or ACN):** Harri**Phone:** 0468613835**Email:** harri@elementenvironment.com.au**Lot:** Lot B and C

DP/SP: DP379430

Development Description (What do you want to build?): Installation of three above-ground bitumen storage tanks.

Do you wish to obtain Informal Pre-DA lodgement Advice (free)?: Yes

The following documents must be provided : Questions for discussion with Council Officer(s)

Do you wish to obtain Formal Pre-DA lodgement Advice (applicable for Regionally Significant Applications, Paid Service)?: No

File Share Link: <https://docs.google.com/document/d/1Smn5Od6sfvnGpgg3OgAwdOpsfCQ0et9u/edit?usp=sharing&ouid=100100580736440840814&rtpof=true&sd=true>

Are you proposing to depart from any codes or polices?: No

What specific element(s) of the proposal are you seeking Council feedback on?: We are doing an SEE for 33 Violet Street, Revesby IXOM bitumen processing plant. The DA is for the installation three bitumen storage tanks, above ground. We have the following questions for discussion: ♣ What type of hydrology or flooding assessments do you require for the DA, considering the site is shown as flood planning area under council flood mapping. ♣ What other type of detailed assessments do you think we need to do? We understand that contamination at the site is currently managed by a voluntary management plan. ♣ What community consultation would council expect as a part of this DA. ♣ We intend to be doing some consultation with the EPA, would council like to be a part of those meetings?

Is your development Regionally Significant Development (SSPP Determination)?: No

I wish to pay fees for the following:: Pre-DA Informal Assessment Fee – Initial Request (Free)

Signature: [View signature](#)

Date: 05/03/2026

Address: Number and Street: 33 Violet Street
Suburb: Revesby
Postcode: 2212
Country: Australia

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APPENDIX D

STORMWATER SYSTEM REPORT



Level 1, 66 - 72 Rickard Road, Bankstown NSW
PO Box 8, Bankstown NSW 1885
Tel: (02) 9707 9010 - Fax: (02) 9707 9408
DX 11220 BANKSTOWN
council@cbc.city.nsw.gov.au

CITY OF CANTERBURY BANKSTOWN

To: Element Environment
PO Box 1563
WARRIEWOOD NSW 2102

STORMWATER SYSTEM REPORT

Property Address	33 Violet Street Revesby 2212
Lot/Section/Deposited Plan	Lot C / / DP 379430
Date Prepared:	01/04/2026
Ref:	WP-SIAONL-617/2026
Prepared By:	Pushpa Goonetilleke
Development Type:	Industrial / Industrial Extension

FLOOD STUDY REQUIRED

No

This Stormwater System Report (SSR) provides flood and stormwater information about the property.

The information in this report should be reviewed by those who are knowledgeable in flooding or have a technical requirement to understand more about Council's building development controls (such as surveyors, builders, certifiers, architects and engineers).

Stormwater Infrastructure

The site is affected by the following Council stormwater system components.

Pipe Type (diameter in mm): Drain(2090x9500x5800), Open Drain(2500x5030x4500) (according to Council records) and associated variable width drainage easement located along the eastern side boundary within and adjacent to the site.

Open Drain(2500x5300x4900) (according to Council records) and associated drainage reserve located along the southern side boundary adjacent to the site.

Property Levels

Description	Minimum (m AHD)	Maximum (m AHD)
Approximate Ground Level	8.50	10.50

Flooding Levels

Stormwater Catchment Flooding from Milperra Catchment Flood Study (BMT WBM, 2015)

Flood Event	Minimum Level (m AHD)	Maximum Level (m AHD)
5% AEP (20 year ARI)	N/A	N/A
1% AEP (100 year ARI)	10.10	10.40
PMF (Probable Maximum Flood)	10.60	11.20

Stormwater Catchment Flooding from Georges River Flood Study 2004.

Flood Event	Minimum Level (m AHD)	Maximum Level (m AHD)
5% AEP (20 year ARI)	N/A	N/A
1% AEP (100 year ARI)	N/A	10.N/A
PMF (Probable Maximum Flood)	10.60	10.60

Terms and Definitions

Annual Exceedance Probability (AEP)	The probability of a flood event of a given size occurring in any one year, usually expressed as a percentage annual chance.
Average Recurrence Interval (ARI):	Similar to AEP. The long-term average number of years between the occurrence of a flood as big as (or larger than) the selected event.
metres above Australian Height Datum (m AHD)	The reference level for defining ground levels in Australia. The level of 0.0m AHD is approximately mean sea level.
Maximum and Minimum Ground Level –	Highest and lowest ground levels on the property based on available ground level information. A Registered Surveyor can confirm exact ground levels.
Probable Maximum Flood	An extreme flood deemed to be the largest flood that could conceivably occur at a specific location The PMF defines the extent of flood prone land (i.e. the floodplain).

Further Information

For further information on flood-related development controls which may be applicable to this property, refer to the following guidelines:

- Canterbury Bankstown Development Control Plan (2023, Chapter 2.2 Flood Risk Management)
- Canterbury Bankstown Development Engineering Standards (2023)
- Council Standard Drawings

Disclaimer

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Any person having regard to the information contained in this document is encouraged to seek, at their discretion, all other sources of information on the subject matter as they consider appropriate, which may include local knowledge and/or professional advice.

ATTACHMENTS

For 1% AEP (100 year ARI)

1. Flood Extent & Flood Contours Map
1. Flood Depth Map
2. Velocity Depth Product Map

For PMF

3. Flood Contours & Flood extent Map
4. GIS Map (from Council's Data)
5. Aerial Map (from Council 's Data)

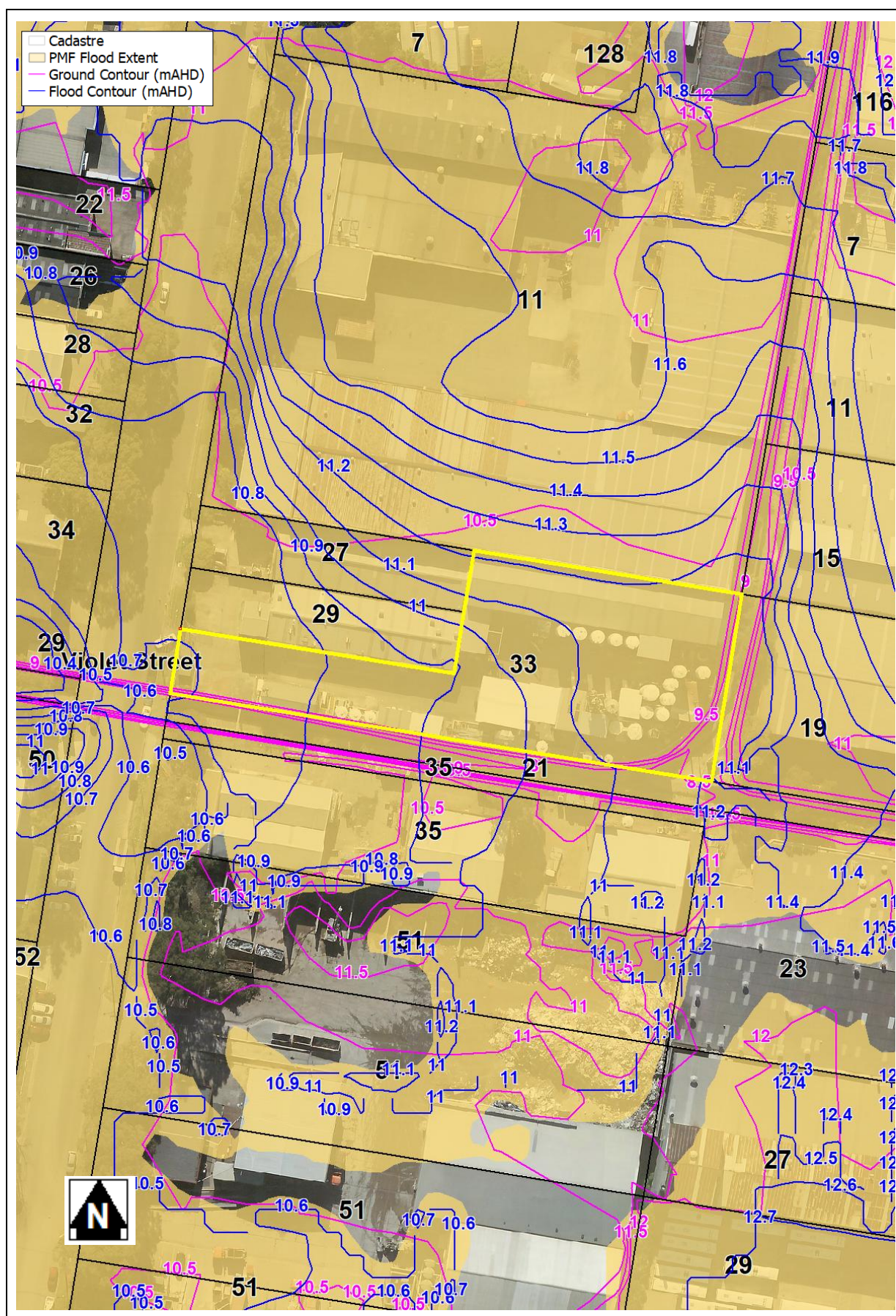
- Note: Attached Georges River Flood Extent Map if affected by Georges River flooding

The hazard categories are: Low

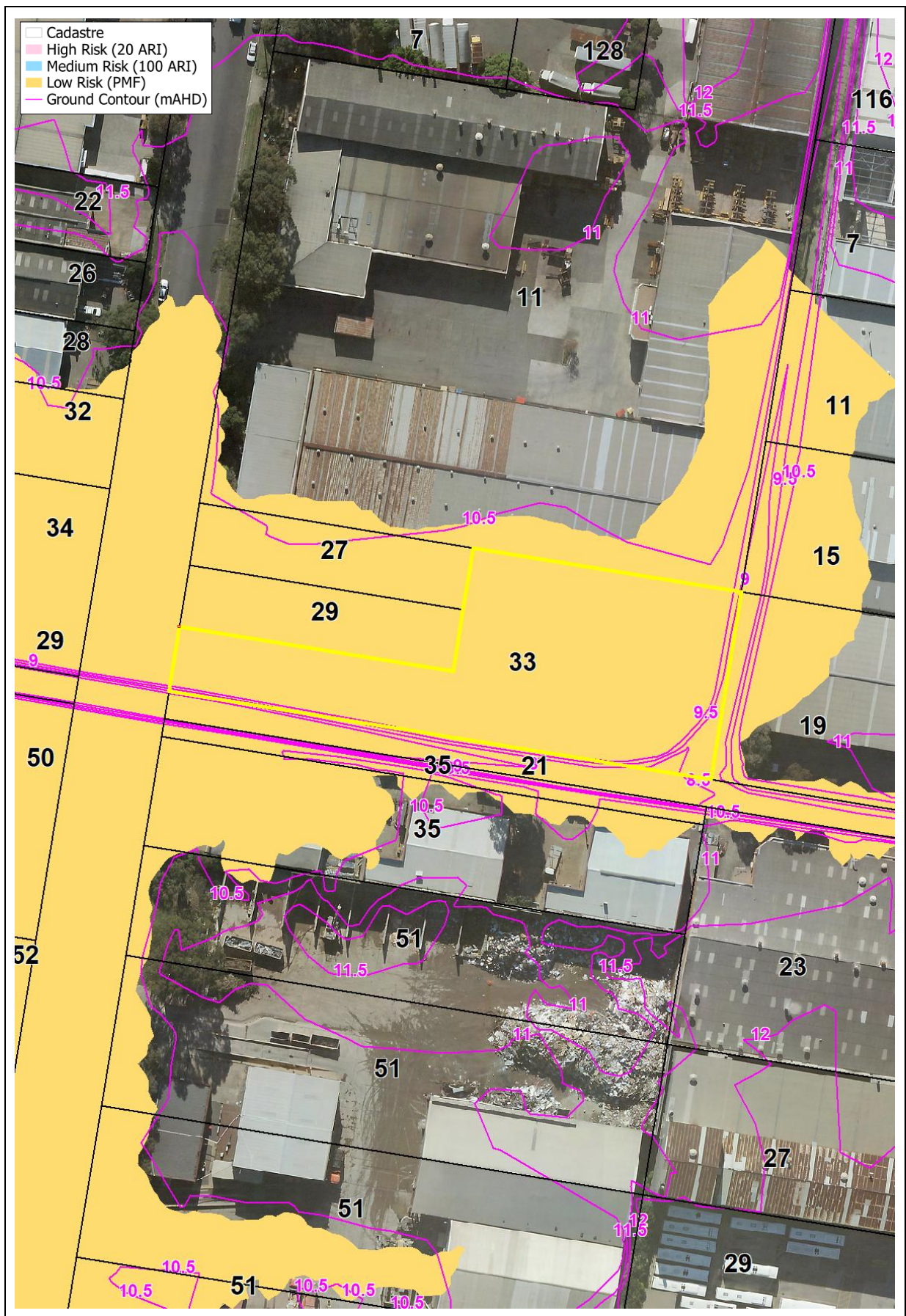


1% AEP (100 year ARI) Flood Extent



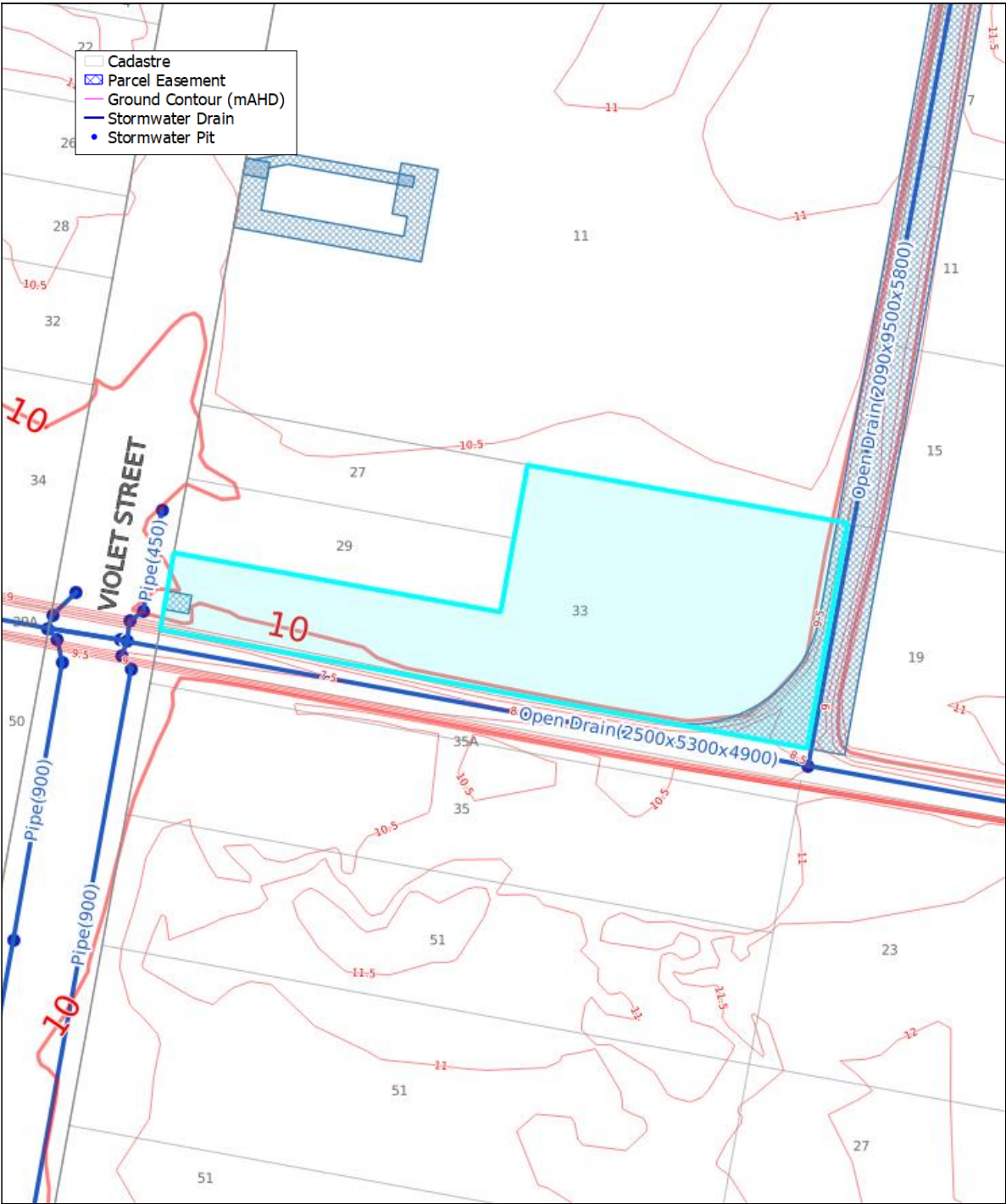


PMF Flood Extent

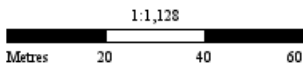


Georges River Flood Hazard Category

GIS Map for 33 Violet Road, Revesby



DATE: Apr 1, 2026, 2:44 PM



PREPARED BY: Pushpa G

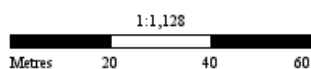
Whilst all care has been taken in the preparation of this base map, Council accepts no responsibility for the accuracy of any information shown. Users should rely on their own enquiries in order to validate information shown on this map. This information is for graphical presentation only.



Aerial Map for 33 Violet Road, Revesby



DATE: Apr 1, 2026, 2:45 PM



PREPARED BY: Pushpa G

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APPENDIX E

CONSTRUCTION NOISE ESTIMATE

Noise Estimator (Individual Plant)

Please input information into yellow cells

Please pick from drop-down list in orange cells

Project name	IXOM Bitumen Processing Plant Revesby DA
Scenario name	Site establishment, construction and demolition
Receiver address	29 - 33 Violet Street, Revesby
Select area ground type	Developed settlements (urban and suburban areas)
Select type of background noise level input	Representative Noise Environment

Noise area category	Representative Noise Environment		User Input
	Day	Evening	Night
RBL or LAeq Background level (dB(A))	50	45	40
LAeq(15minute) Noise management level (dB(A))	Day	60	55
	Evening	55	50
	Night	45	40
	Day (OOHW)	55	50

Is all plant at the same representative distance to the receiver? Y/N	Y
Representative distance (m)	300

All at Representative Distance

Steps:

- Enter project name (cell D9).
- Enter scenario name (cell D10).
- Enter receiver address (cell D11).
- Select area ground type (cell D12) - water, undeveloped green fields (e.g. rural areas with isolated dwellings) or developed settlements (e.g. urban and suburban areas).
- Select the type of background noise level input - Representative noise environment (to make assumptions) or user input (where noise monitoring data is available):
 - where representative noise environment is selected - select the appropriate noise area category (cell D16). The worksheet titled 'Representative Noise Environ.' provides a number of examples to help select the noise area category.
 - where user input is selected - enter the measured background noise level for each time period (cells E17 to E19).
- Is all plant at the same representative distance to the receiver? Select Y or N (cell D25):
 - where Y is selected - enter the representative distance in cell D26.
 - where N is selected - go to step #7
- For the type or model plant (e.g. grader), select plant from the drop-down list in cells B29 to B48 (e.g. grader + roller).
 - enter quantity for each selected plant in cells D28 to D47.
 - where N is selected from step #6 - enter the distance to receiver for each individual plant in cells F29 to F48.
 - is there line of sight to receiver? select from drop down list in cells G29 to G48. Solid barrier can be in the form of road cutting, solid construction hoarding, acoustic curtain, timber lapped and capped fence, shipping container, site office, etc. Please note that vegetation and trees are not considered to be a form of solid barrier.
- Identify the level above background and/or noise management level (see rows 59 to 62 and/or rows 63 to 66).
- Identify and implement standard mitigation measures where feasible and reasonable. Include any shielding implemented as part of the standard mitigation measures by changing the selection in the 'Is there line of sight to receiver' drop-down list.
- Identify and implement feasible and reasonable additional mitigation measures (see rows 67 to 70).
- Document a summary report detailing:
 - project description (including location, duration, hours of work, construction methodology, plant, potentially impacted receivers, etc.)
 - background noise levels
 - noise management levels
 - predicted noise levels for each time period
 - sleep disturbance affected distance for night works

Type/ model plant (See Sources Sheet)	SWL LAeq (dB(A))	SPL @7m (dB(A))	Quantity	Individual distance to receiver (m)	Is there line of sight to receiver? Y/N	Quantity correction (dBA)	Shielding correction (dBA)	Distance used in calculation (m)	Contribution SPL (dB(A))
Compressor	109	84	1		No (behind solid barrier)	0	-5	300	41
13.5t Excavator	110	85	2		No (behind solid barrier)	3	-5	300	45
PC400 45t tracked excavator with Hammer	122	97	2		No (behind solid barrier)	3	-5	300	57
Concrete saw	118	93	1		No (behind solid barrier)	0	-5	300	50
Front End Loader	113	88	2		No (behind solid barrier)	3	-5	300	48
Dump Trucks	110	85	2		No (behind solid barrier)	3	-5	300	45
Vacuum truck	109	84	1		No (behind solid barrier)	0	-5	300	41
Compactor	113	88	1		No (behind solid barrier)	0	-5	300	45
Small Hand Tools	105	80	10		No (behind solid barrier)	10	-5	300	47
BG24 Bored piling rig (RW01.04)	114	89	1		No (behind solid barrier)	0	-5	300	46
BM800 Crane	113	88	2		No (behind solid barrier)	3	-5	300	48
Concrete Truck	109	84	1		No (behind solid barrier)	0	-5	300	41
Concrete pump	105	80	1		No (behind solid barrier)	0	-5	300	37
Mobile Crane	113	88	1		No (behind solid barrier)	0	-5	300	45
Truck (>20tonne)	106	81	5		No (behind solid barrier)	7	-5	300	45
Scissor Lift	98	73	1		No (behind solid barrier)	0	-5	300	30
						0	-10		-888
						0	-10		-888
						0	-10		-888
						0	-10		-888

Total SPL LAeq(15minute) (dB(A))	60
----------------------------------	----

		Non-residential receivers							
		Residential receiver	Classroom at schools and other educational institutions	Hospital wards and operating theatres	Place of worship	Active recreation	Passive recreation	Industrial premise	Offices, retail outlets
Noise Management Level (dB(A))	Standard hours	60	55	65	55	65	60	75	70
	Day (OOHW)	55	55	65	55	65	60	75	70
	OOHW Period 1	50		65	55	65	60	75	70
	OOHW Period 2	45		65	55			75	70
Level above background (dB(A))	Standard hours	10							
	Day (OOHW)	10							
	OOHW Period 1	15							
	OOHW Period 2	20							
Level above NML (dB(A))	Standard hours	0	5		5		0		
	Day (OOHW)	5	5		5		0		
	OOHW Period 1	10							
	OOHW Period 2	15			5				
Additional mitigation measures	Standard Hours	-	-	-	-	-	-	-	-
	Day (OOHW)	N, R1, DR	N, R1, DR	-	N, R1, DR	-	-	-	-
	OOHW Period 1	N, R1, DR		-	N, R1, DR	-	-	-	-
	OOHW Period 2	V, IB, N, PC, SN, R2, DR		-	V, N, R2, DR			-	-

Abbreviation	Measure
N	Notification
SN	Specific notifications
PC	Phone calls
IB	Individual briefings
RO	Respite offer
R1	Respite period 1
R2	Respite period 2
DR	Duration respite
AA	Alternative accommodation
V	Verification



APPENDIX F

PRELIMINARY WASTE CLASSIFICATION

Preliminary Waste Classification and Virgin Excavated Natural Material Report

Report Reference	19917-ER-1-1	Report Date	13/02/2026
Client	MCS Civil		
Client project name	Proposed Truck Turntable		
Site address	29 and 33 Violet Street, Revesby NSW 2212 (refer to Appendix B for a site locality plan).		
Lot & Deposited Plan (DP)	A portion of Lot B and Lot C in DP 379430		
Definition of virgin excavated natural material (VENM) from POEO Act 1997	Natural material (such as clay, gravel, sand, soil or rock fines): a) that has been excavated or quarried from areas that are not contaminated with manufactured chemicals, or with process residues, as a result of industrial, commercial, mining of agricultural activities, and b) that does not contain any sulfidic ores or soils¹ or any other waste, and includes excavated natural material that meets such criteria for virgin excavated natural material as may be approved for the time being pursuant to an EPA Gazettal notice'.		
Location, quantity and history of material	In-situ materials at client-nominated geotechnical borehole locations as part of preliminary works to inform detailed design associated with the proposed truck turntable. Refer to Appendix B for a site layout plan.		
Geology	The 'Seamless Geology' dataset accessed at MinView NSW Department of Primary Industries and Regional Development NSW Resources indicated that the site is likely to be underlain by alluvium (comprising unconsolidated alluvial clay, silt, sand, and gravel deposits) and Ashfield Shale (comprising black to light grey shale and laminite).		
EPA Public Registers	A search of the NSW EPA online contaminated land record of notices indicated that the site (and land located immediately adjacent to the site) was the subject of: - orders made under Part 3 of the Contaminated Land Management (CLM) Act 1997; - notices available to the public under section 58 of the CLM Act; - an approved voluntary management proposal under the CLM Act that has not been fully carried out and where NSW EPA approval has not been revoked; - site audit statements provided to the NSW EPA under section 53B of the CLM Act that relate to significantly contaminated land; - where practicable, copies of anything formerly required to be part of the public record; or		

¹ The NSW EPA's position is if the excavated material contains detectable concentrations of reduced inorganic sulfur ('RIS') above the laboratory limit of reporting, it would be considered to contain sulfidic ores and soils. Detectable concentrations of RIS may include actual acidity commonly reported as TAA, potential sulfidic acidity commonly reported as S_{CR} or S_{POS}, and retained acidity commonly reported as S_{NAS} in a typical laboratory report.

	- actions taken by NSW EPA (or the previous State Pollution Control Commission) under section 35 or 36² of the Environmentally Hazardous Chemicals Act 1985. - A section 35 notice was issued to the site in May of 1998 requiring that Bituminous Products Pty Ltd conduct a site investigation to characterise on-site contamination to the extent necessary to determine the potential risk to human health and the environment; - A declaration of a remediation site for 33-35 Violet Street, Revesby following assessment of on-site contamination in groundwater; - A voluntary remediation proposal was agreed to in order to address contamination characterised, published in July 2007, which was completed in August 2019; - Multiple voluntary management proposals (VMPs) were agreed to and then completed in August and October of 2019. An amendment was made for the due date for an annual reporting requirement to the EPA in January 2020; - A notice to amend the ongoing VMP was issued in April of 2020, outlining sampling and reporting requirements for the ongoing implementation of the VMP; and - A notice of cessation of that VMP was issued, followed by the issuing of a new VMP, in March of 2023. A search of the NSW EPA online POEO public register indicated that the site (and land located immediately adjacent to the site) was the subject of a licence, application, notice, audit, pollution study or reduction program: - A POEO licence (licence no. 5267) issued to the site in August of 2000 for the fee-based activity "Petroleum products and fuel production (general): scale of >10000-200000 T annual production capacity"; - Multiple s.58 licence variations issued to the site from March of 2004 to October of 2025; and - A POEO licence transfer in August 2006; A search of the NSW EPA online list of NSW contaminated sites notified to NSW EPA indicated that the site was on the list. A copy of the search records is presented in Appendix E.
Historical Aerial Imagery	A selection of readily available online historical aerial imagery (from 1943 to 2025) was reviewed. The review indicated that land uses at the site during that period, have been initially as a vacant and vegetated lot, followed by development in the 1950s for use as an industrial / commercial site containing large buildings and hardstand.
Anecdotal Evidence	No anecdotal evidence was made available to Alliance.
Potential land contaminating activities associated with the site	Online searches indicate potential on the land where the material is to be excavated from for uncontrolled filling associated with the construction of the industrial/commercial site, contamination associated with former and ongoing industrial activities, and contamination found in previous investigations on the site as recorded and discussed in the EPA public registers section.
Are sulfidic ores or soils present.	A review of https://www.environment.nsw.gov.au/eSpade2Webapp indicated that the land the material is to be excavated from is located in an area mapped as: X4: disturbed terrain, elevation >4m AHD Further assessment of whether actual acid sulfate soils (AASS) or potential acid sulfate soils (PASS) requiring management (in the context of this preliminary waste classification), are present on the site is considered not warranted. Further assessment of whether actual acid sulfate soils (AASS) or potential acid sulfate soils (PASS) in the context of this preliminary VENM assessment, are present on the site, is considered warranted.

² Sections 35 and 36 of the Environmentally Hazardous Chemicals Act 1985 have been repealed. Notices under these sections are treated by the CLM Act as management orders.

Sampling and Analytical
Plan

Refer to **Appendix A** and **Appendix B**.

FIELDWORK

Description of the material

BH01

0.0-0.2mbgl Concrete

0.2-0.7mbgl Fill: Silty CLAY, low to medium plasticity, dark grey-grey, trace fine to coarse subangular shale gravel, trace fine to coarse sand, dry to moist

0.7-1.9mbgl Natural: CLAY, medium to high plasticity, yellow-brown, trace silt, and fine to coarse sand, trace orange-grey mottling, dry to moist, more silt, grey-yellow-brown in colour from 1.7mbgl

1.9-2.8mbgl Natural: Clayey SILT, low plasticity, grey, dry to moist

2.8-5.0mbgl Natural: CLAY, low to medium plasticity, brown-yellow-red-mottled orange, with silt, with fine to coarse subangular ironstone gravel, wet from 4.0mbgl

A moderate sulfur odour was observed from 1.7mbgl

BH02

0.0-0.1mbgl Concrete

0.1-0.2mbgl Fill: SAND, fine to coarse, brown, trace clay, dry to moist

0.2-0.5mbgl Fill: Silty CLAY, low plasticity, grey-dark grey, dry to moist

0.5-5.0mbgl Natural: CLAY, medium plasticity, yellow-brown-grey-orange, trace silt, with silt from 2.0mbgl, trace fine to coarse subangular ironstone gravels from 4.0mbgl, wet from 4.3mbgl

A mild sulfur odour was observed from 0.2mbgl

BH03

0.0-0.1mbgl Concrete

0.1-0.2mbgl Fill: SAND, fine to coarse, brown, dry to moist

0.2-0.5mbgl Fill: Silty CLAY, low to medium plasticity, grey, dry to moist

0.5-5.0mbgl Natural: CLAY, medium to high plasticity, yellow-brown-grey, with silt, trace fine sands, moist, grey in colour from 0.7mbgl, more silt from 1.5mbgl, trace ironstone fine to coarse subangular gravel, brown-orange mottling, and more moist from 2.8mbgl

A mild sulfur odour was observed from 0.2-0.5mbgl

A moderate sulfur odour was observed from 0.5-5.0mbgl

BH04

0.0-0.2mbgl Concrete

0.2-1.0mbgl Fill: Gravelly CLAY, low plasticity, fine to coarse subangular shale gravels, grey-dark grey-black, trace sand, wet

1.0-5.0mbgl Natural: CLAY, medium plasticity, grey, with silt, trace orange-yellow-brown mottling, trace fine to coarse sand, dry to moist trace fine to coarse subangular ironstone gravel from 2.8mbgl, wet from 4.0mbgl

A mild hydrocarbon odour was observed from 0.2-1.0mbgl

A moderate sulfur odour was observed from 1.0mbgl

Potential asbestos containing material (PACM) was not observed in the material.

Staining was not observed in the material. Odours were observed in the material as noted in the individual borehole material descriptions and the copy of the borehole field logs.

Each borehole was excavated to the target depth of 5.0mbgl.

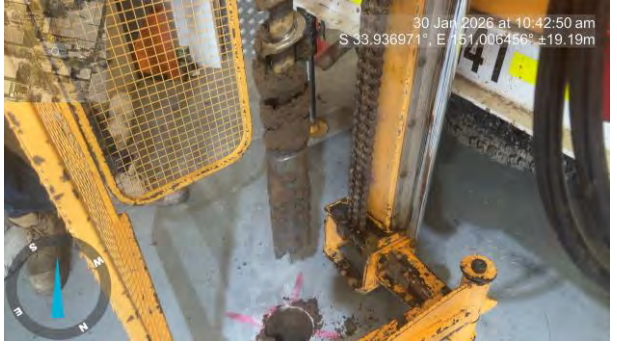
Observations of potential ASS material indicators	A copy of the borehole field logs is presented in Appendix F. During the fieldwork, Alliance made the following observations: • unripe muds (soft, sticky and can be squeezed between fingers, blue grey or dark greenish grey mud with a high water content), were not encountered; • estuarine silty sands or sands (mid to dark grey) or bottom sediments (dark grey to black for example monosulfidic black oozes) were not encountered; • peat or peaty soils were not encountered; • coffee rock horizons were not encountered; • a sulfurous smell for example hydrogen sulfide or 'rotten egg' gas, was encountered; • jarositic horizons or substantial iron oxide mottling in the surface encrustations or in any material excavated and left exposed, were not encountered; • presence of corroded mollusc shells were not encountered; • dead, dying or stunted vegetation was not encountered; • scalding or bare low-lying areas were not encountered; and • corrosion of concrete or steel structures was not encountered.
Photographs of the fill material being assessed	
Image 1: A view of fill material encountered in BH01.	Image 2: A view of fill material encountered in BH02.
	
Image 3: A view of fill material encountered in BH04.	Image 4: A view of natural material encountered in BH01.
	
Image 5: A view of natural material encountered in BH02.	Image 6: A view of natural material encountered in BH03
	

Image 7: A view of natural material encountered in BH04.



Image 8: A view of samples collected from BH01.



RESULTS

Data Quality Indicator Assessment	Refer to Appendix A .
Laboratory Analytical Results Assessment	Laboratory documentation is presented in Appendix C . The sample identifiers, sample depths, analytes and analytical results have been tabulated and are presented in Appendix D .
Acid Sulfate Soils	<u>Field pHF</u> On the basis that: - the pHF analytical results were greater than the preliminary 'actual acid sulfate soils' screening criterion of $\text{pH} \leq 4$; and - jarosite was not observed in the soils assessed, actual acid sulfate soils (AASS) are unlikely to be present in those samples. <u>Field pHFox</u> On the basis that: - there were samples with pHFox analytical results that were at least 1 pH unit below the respective pHF results; and - there were samples with pHFox analytical results that were less than pH 3, with a large pH unit drop below the respective pHF results; and - the oxidation reaction was reported as strong or greater, in those samples, potential acid sulfate soils (PASS) are highly likely to be present in those samples. <u>Chromium Reducible Sulfur</u> For the purpose of deriving action criteria, Alliance reviewed: - observations of the soils encountered and reported in the borehole logs, and their textures in the context of Table 5.4 of Sullivan et al (2018a), Appendix D in Sullivan et al (2018b); and - information regarding the extent of proposed soil disturbance of >1000T in the context of bulk density conversion multipliers in Table 5.1 of Sullivan et al (2018b). The CRS laboratory analytical results were compared with the adopted action criteria. The sulfur trail (% sulfur) and acid trail (mol H⁺/t) analytical results, using the CRS method, were greater than the relevant action criteria in Table 5.4 of Sullivan et al (2018), in three of the 10 samples analysed (BH01-2.4-2.5, BH03-0.2-0.3 and BH04-0.7-0.8). When considered in the context of the screening results, this indicates that potential acid sulfate soils (PASS) may be present on site at those sampling points.
Asbestos	Asbestos was not detected at the laboratory limit of reporting.

SIX STEP WASTE CLASSIFICATION PROCESS³	
Step 1	The fill material is not considered to be special waste.
Step 2	The fill material is not considered to be a liquid waste.
Step 3	The fill material is not considered to be pre-classified.
Step 4	The fill material is not considered to possess hazardous characteristics.
Step 5	The detected concentrations of analytes in the fill material samples analysed, were less than the relevant CT1 values in Table 1 of NSW EPA (2014a) and the relevant TCLP1 and SCC1 values in Table 2 of NSW EPA (2016), with the exception of: • lead in sample BH01-0.2-0.3 (110mg/kg, CT1 value of 100mg/kg); • nickel in sample BH01-0.2-0.3 (78mg/kg, CT1 value of 40mg/kg); and • benzo(a)pyrene in multiple samples with the maximum detection BH04-0.7-0.8 (42mg/kg, CT2 value of 3.2mg/kg and SCC2 value of 23mg/kg). • total PAHs in sample BH04-0.7-0.8 (410mg/kg, CT1 value of 200mg/kg and SCC2 value of 800mg/kg). Sample BH01-0.2-0.3 was subjected to lead TCLP⁴ analysis and the detected concentration was less than the relevant TCLP1 value in Table 2 of NSW EPA (2014a). Sample BH01-0.2-0.3 was subjected to nickel TCLP⁵ analysis and the detected concentration was less than the relevant TCLP1 value in Table 2 of NSW EPA (2014a). Samples BH01-0.2-0.3, BH04-0.7-0.8 and BH04-1.0-1.1 were subjected to benzo(a)pyrene TCLP⁶ analysis and the detected concentration was less than the relevant TCLP1 value in Table 2 of NSW EPA (2014a).
Step 6	The material is not considered to be putrescible.

³ NSW EPA (2014a)

⁴ Toxicity characteristic leaching procedure

⁵ Toxicity characteristic leaching procedure

⁶ Toxicity characteristic leaching procedure

PRELIMINARY VIRGIN EXCAVATED NATURAL MATERIAL ASSESSMENT

Organics	The concentration of TRH, BTEX and PAH in the natural material samples analysed were not less than the laboratory's limit of reporting. The concentration of OCP and PCB in the natural material samples analysed were less than the laboratory's limit of reporting.
Metals	The concentration of zinc was not within the relevant background range for this metal, presented in Berkman D A (1989). The concentration of arsenic, cadmium, chromium, copper, lead, nickel were within the relevant background ranges of these metals, presented in Berkman D A (1989).

PRELIMINARY MATERIAL CLASSIFICATION

Based on an assessment of desktop review data, fieldwork observations and laboratory analytical data:

- the **fill material** assessed as at the time of this report would **preliminarily classify** as
 - BH1, BH2 and BH3: General Solid Waste containing PASS / AASS requiring management**
 - BH4: Hazardous Waste containing PASS / AASS requiring management.**
- the **natural material** assessed as at the time of this report would not classify as virgin excavated natural material (VENM) and contains sulfidic ores or soils. As at the time of this report would preliminary classify as **General Solid Waste (non-putrescible) containing PASS / AASS requiring management.**

This classification must be read in conjunction with the attached Information About This Report.

REFERENCES

Ahern C R, Stone, Y, and Blunden B 1998, 'Acid Sulfate Soils Assessment Guidelines' published by the Acid Sulfate Soil Management Advisory Committee, Wollongbar, NSW, Australia.

AS 4482.1-2005 'Guide to the investigation and sampling of sites with potentially contaminated soil, Part 1: Non-volatile and semi-volatile compounds' dated November 2005.

Berkman D A 1989, 'Field Geologist's Manual, Third Edition' published by The Australasian Institute of Mining and Metallurgy.

Dear SE, Williams KM, McElnea AE, Ahern CR, Dobos SK, Moore NG, and O'Brien LE 2024, 'Queensland Acid Sulfate Soil Technical Manual, Soil Management Guidelines' dated 2024, Version 5.1

EPA VIC 2009 'Industrial Waste Resource Guidelines' dated June 2009, ref: IWRG702.

HEPA 2025, 'PFAS National Environmental Management Plan Version 3.0', Heads of EPA Australia and New Zealand 2025. CC BY 4.0.

NEPC 2013, 'National Environment Protection (Assessment of Site Contamination) Measure (NEPM)' as amended in May 2013.

NSW DPIE 2021, 'State Environmental Planning Policy (Resilience and Hazards) 2021'

NSW EPA 2014a, 'Waste Classification Guidelines – Part 1: Classification of waste' dated November 2014, ref: EPA 2014/0796

NSW EPA 2014d, 'Waste Classification Guidelines – Part 4: Acid sulfate soils' dated November 2014, ref: EPA 2014/0798

NSW EPA 2020, 'Contaminated Land Guidelines: Consultants reporting on contaminated land' dated May 2020, ref: EPA2020P2233.

NSW EPA 2022, 'Contaminated Land Guidelines: Sampling design part 1 – application' dated August 2022, ref: EPA2022P3915

SafeWork NSW 2022, 'Code of Practice, How To Safely Remove Asbestos' dated December 2022

Sullivan et al 2018a, 'National Acid Sulfate Soils Guidance: National acid sulfate soils sampling and identification methods manual' dated June 2018

Sullivan et al 2018b, 'National Acid Sulfate Soils Guidance: National acid sulfate soils identification and laboratory methods manual' dated June 2018

WA DWER 2021, 'Assessment and management of contaminated sites', dated November 2021.

WorkCover NSW 2014, 'Managing asbestos in or on soil', dated March 2014

For and on behalf of Alliance Geotechnical Pty Ltd

Approved By

Zac McKenzie
Environmental Scientist

Michael Dunesky
Senior Project Environmental Scientist

Attached

Important Information About This Report

Appendix A – Sampling Plan and Data Quality Indicator Assessment

Appendix B – Site and Sampling Point Layout Plan

Appendix C – Chain of Custody, Sample Receipt and Certificates of Analysis

Appendix D – Sample Data and Analytical Summary Table

Appendix E – NSW EPA Online Public Register Search Records

Appendix F – Logs

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This report must be reviewed in its entirety and in conjunction with the objectives, scope and terms applicable to Alliance's engagement. The report must not be used for any purpose other than the purpose specified at the time Alliance was engaged to prepare the report.

The findings presented in this report are based on specific data and information made available during the course of this project. To the best of Alliance's knowledge, these findings represent a reasonable interpretation of the general condition of the site at the time of report completion.

No warranties are made as to the information provided in this report. All conclusions and recommendations made in this report are of the professional opinions of personnel involved with the project and while normal checking of the accuracy of data has been conducted, any circumstances outside the scope of this report or which are not made known to personnel and which may impact on those opinions is not the responsibility of Alliance.

Logs, figures, and drawings are generated for this report based on individual Alliance consultant interpretations of nominated data, as well as observations made at the time fieldwork was undertaken.

Data and/or information presented in this report must not be redrawn for its inclusion in other reports, plans or documents, nor should that data and/or information be separated from this report in any way.

Should additional information that may impact on the findings of this report be encountered or site conditions change, Alliance reserves the right to review and amend this report.

Appendix A – Sampling Plan and Data Quality Indicator Assessment

SAMPLING PLAN	
Fieldwork date	30/01/2026
Fieldwork team	Zac McKenzie
Sampling point locations	Sampling point locations are presented in Appendix B .
Rationale for sampling pattern	The sampling pattern for the in-situ materials will be at client-nominated geotechnical locations, to inform the detailed design of the proposed truck turntable.
Rationale for sample collection and analytical quantities	A minimum of 8 inferred fill material samples will be collected, based on guidance in Table 2 and Table 3 in NSW EPA (2022), the number of client-nominated geotechnical locations. Where the material is suspected of being impacted by asbestos, a minimum of 3 asbestos samples will be collected for in-situ volumes less than 75m³, plus one additional asbestos sample for in-situ volumes of 75m³ or more, based on guidance in Table 5 in NSW EPA (2022). A minimum of 4 samples inferred natural material samples will be collected, taking into consideration guidance in Table 2 and Table 3 in NSW EPA (2022) and the number of client-nominated geotechnical locations. If the material is suspected of being impacted by asbestos, a minimum of 3 asbestos samples will be collected for in-situ volumes less than 75m³, plus one additional asbestos sample for in-situ volumes of 75m³ or more, based on guidance in Table 5 in NSW EPA (2022). A minimum of 1 sample will be collected at each location for acid sulfate soils analysis at 0.0 and then each 0.5m, to a depth of 1m below the depth of the waste intended to be assessed (where no groundwater alteration is expected), will be collected.
Material sampling method	Samples will be collected from boreholes using a drilling rig fitted with solid flight augers. Samples will be collected with reference to relevant guidance in Section 7.2 of NEPC (2013) and Section 6.7 of Sullivan et al (2018a). A fresh pair of nitrile gloves will be used to collect each sample. Samples will be placed in laboratory prepared containers and bags, each labelled with the project number, date, sampling point identifier, and sample depth identifier. Samples for acid sulfate soils analysis will be placed in zip lock bags with the air removed. Samples will be stored in an insulated container with ice. Recommended holding times will be considered when arranging sample transport to the analytical laboratory. Field duplicates and triplicates will be collected⁷ at a rate of 5%. A rinsate blank will be collected when non disposable sampling equipment is used. A trip spike and trip blank will be kept with the samples during storage and transport.
Material sample collection depths	The first sample will be collected at the surface, then at regular depths thereafter, targeting visual or olfactory signs of contamination, to the target depth of assessment, (including at 0.0m and every 0.5m for ASS assessment).
Rationale for lab selection, analytical suite and analytical data quality	NATA accredited laboratories will be used for sample analysis, adopting limits of reporting (LOR) that are less than adopted assessment criteria.

⁷ The laboratory analytical results of field duplicates and triplicates are not compared to adopted screening criteria on the basis that field duplicate and triplicate samples:

- are collected for assessment of field quality control purposes (refer Table 19.6 in Schedule 2 of NEPC (2013));
- are used to provide a check on precision (repeatability) of the laboratory's analysis (refer Section 3.5.1 of Schedule 3 in NEPC (2013));
- are not treated as independent sample data (refer Section 2.6 of Part 2 of NSW EPA (2022)); and
- are not collected for material characterisation purposes.

	Based on the potential land contaminating activities associated with the site and consideration being given to Table J1 in Appendix J of AS 4482.1-2005⁸, Table B1 in Appendix B of WA DWER (2021) and Table C1 and Table C2 in Appendix C of HEPA (2025), the following range of analytes have been selected: TRH, BTEX, PAH, OCP, PCB, 8 metals and asbestos (absence/presence) As a risk of ASS or PASS has been identified, relevant samples will be subjected to pHF/pHFox analysis, and selected samples subjected to chromium reducible sulfur (CRS) analysis. Laboratory data quality will be checked by assessing holding time compliance, and the results of analysis on method blanks, control samples, spike samples and duplicates.
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Completeness DQI			
<i>Field Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Experienced sampling team used	Yes	Yes	Pass
Sampling devices and equipment set out in sampling plan were used.	Yes	Yes	Pass
Critical locations in sampling plan, sampled.	Yes	Yes	Pass
Critical samples in sampling plan, collected.	Yes	Yes	Pass
Completed field logs attached.	Yes	Yes	Pass
Completed chain of custody attached.	Yes	Yes	Pass
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Complete sample receipt advice and chain of custody attached	Yes	Yes	Pass
Critical samples identified in sampling plan, analysed	Yes	Yes	Pass
Analysis undertaken addresses COPC in sampling plan.	Yes	Yes	Pass
Analytical methods reported in laboratory documentation and appropriate limit of reporting used.	Yes	Yes	Pass
Sample holding times met.	Yes	Yes	Pass

⁸ Alliance understands this standard has been withdrawn, however, guidance on the Aged Standards Review process at <https://www.standards.org.au/standards-development/aged-standards>, indicates that it is still possible for a withdrawn standard to be used within an industry or reference by a government if chosen to do so. On the basis that this standard is referenced in NEPC (2013b), it is considered reasonable to still refer to it, within the context of this project.

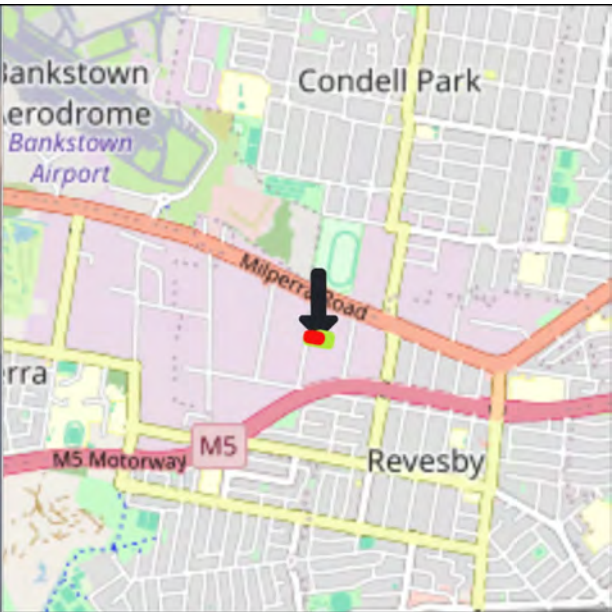
Comparability			
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Same sampling team used for all work.	Yes	Yes	Pass
Weather conditions suitable for sampling.	Yes	Yes	Pass
Same sample types collected and preserved in same way.	Yes	Yes	Pass
Relevant samples stored in insulated containers and chilled.	Yes	Yes	Pass
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Same laboratory used for all analysis.	Yes	Yes	Pass
Comparable methods if different laboratories used.	n/a	n/a	n/a
Comparable limits of reporting if different laboratories used.	n/a	n/a	n/a
Comparable units of measure if different laboratories have been used.	n/a	n/a	n/a

Representativeness			
<i>Field Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Media identified in sampling plan, sampled.	Yes	Yes	Pass
Samples required by sampling plan, collected.	Yes	Yes	Pass
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Samples identified in sampling plan, analysed.	Yes	Yes	Pass

Precision			
<i>Field Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Minimum 5% duplicates and triplicates collected and analysed.	Yes	No	Comment – duplicate and triplicate samples were collected and placed on hold with the analytical laboratory. Sampling was undertaken using industry accepted procedures. Laboratory analysis was undertaken by a reputable NATA accredited environmental laboratory. Analytical results were within expected ranges based on site history, field observations and experience on comparable projects. Performance against this DQI is considered adequate.
RPD unlimited where detected concentrations are <10 times the limit of reporting.	n/a	n/a	n/a
RPD within 50% where detected concentrations are 10-20 times the limit of reporting.	n/a	n/a	n/a
RPD within 30% where detected concentrations are >20 times the limit of reporting.	n/a	n/a	n/a
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
All laboratory duplicate RPDs within laboratory acceptance criteria.	Yes	No	Comment – Six analytes (arsenic, cadmium, chromium, copper, mercury and nickel) failed against the laboratories RPD exceedance criteria. The RPD reported passes Eurofins Environment Testings QC (Qualifier Code: Q15). The RPD reported passes Eurofins Environment Testing's QC - Acceptance Criteria as defined in the Internal Quality Control Review. Three analytes (chromium, lead and zinc) failed against the laboratories RPD exceedance criteria. The RPD reported passes Eurofins Environment Testings QC (Qualifier Code: Q02). The duplicate %RPD is outside the recommended acceptance criteria. Further analysis indicates sample heterogeneity as the cause. Performance against this DQI is considered adequate.

Bias (Accuracy)			
<i>Field Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Trip blank analyte results less than limit of reporting.	Yes	No	Comment - trip blank not used for this project. The detected concentrations of BTEX in the samples analysed were less than the laboratory limit of reporting. The risk of volatile cross contamination of samples during storage and transport, is therefore considered to be negligible. Performance against this DQI is considered adequate.
Trip spike analyte results between 60% and 140%.	Yes	No	Comment - Trip spike not used for this project. No evidence of odour or staining in the samples collected. The samples were placed in laboratory prepared containers with minimal headspace, and stored in an insulated container with ice, The risk of loss of volatiles during storage and transport is considered to be negligible. Performance against this DQI is considered adequate.
Rinsate blank analyte results less than limit of reporting.	Yes	No	Comment - Rinsate blank was not used for this project. Re-usable sampling equipment not used for this project. Samples collected either directly from the base/wall of the test pits, or from the centre of the soils in the excavator bucket, using a fresh pair of nitrile gloves for each sample. Risk of cross contamination during sampling is considered to be negligible. Performance against this DQI is considered adequate.
<i>Laboratory Considerations</i>	<i>Target Criterion</i>	<i>Result</i>	<i>Pass / Fail / Comment</i>
Laboratory method blank results within laboratory acceptance limits.	Yes	Yes	Pass
Laboratory control sample results within laboratory acceptance limits.	Yes	Yes	Pass
Laboratory spike sample results within laboratory acceptance limits.	Yes	Yes	Pass

Appendix B – Site and Sampling Point Layout Plan



Legend

- Approximate location for proposed truck turntable
- Approximate location of investigation boreholes
- Site Boundary for 29 Violet Street Revesby
- Site Boundary for 33 Violet Street, Revesby



A view of a portion of the site, facing approximately west.

0 5 m 10 m
© Nearmap

alliance

Produced by **Datanest.earth**

Title: ER-1-1 Site Locality and Sampling Plan

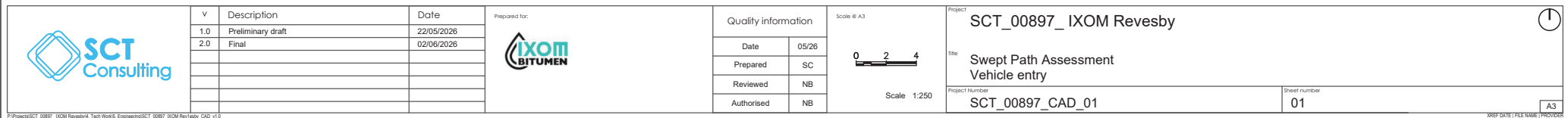
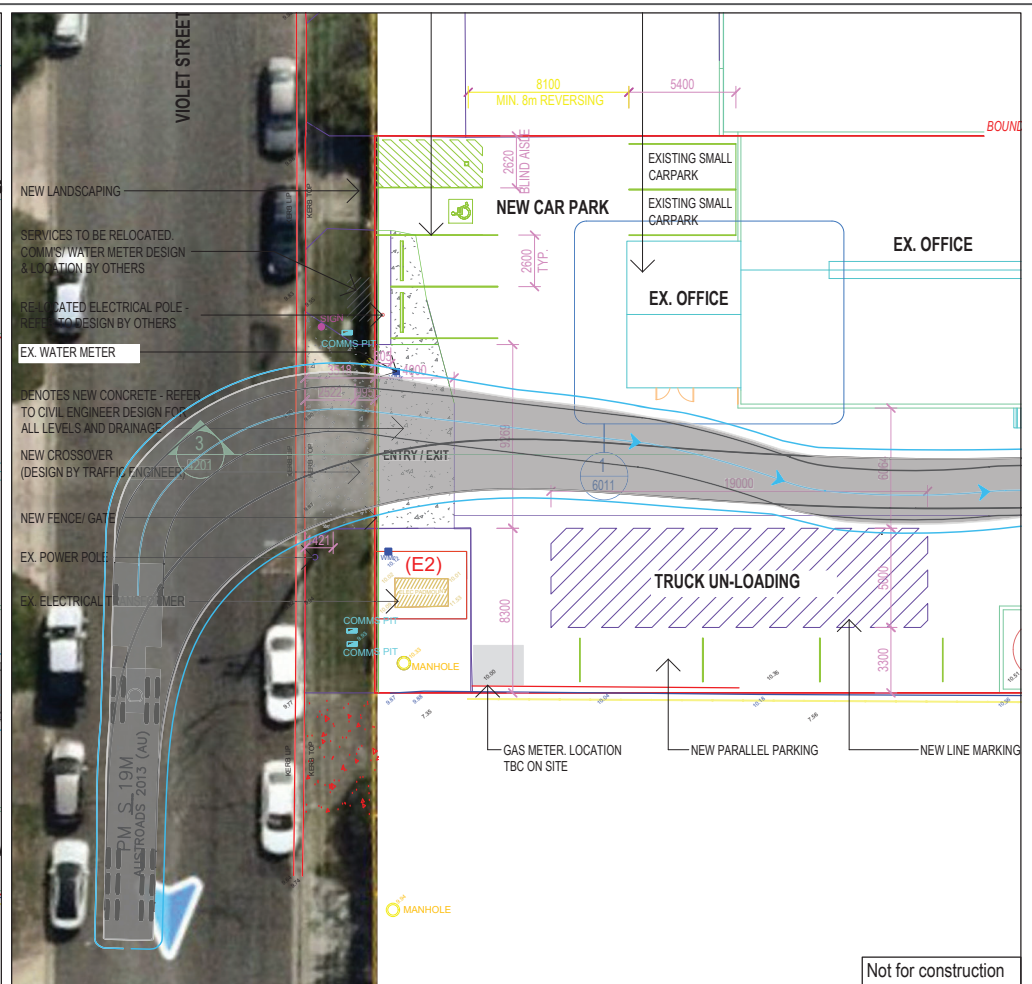
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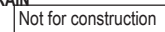
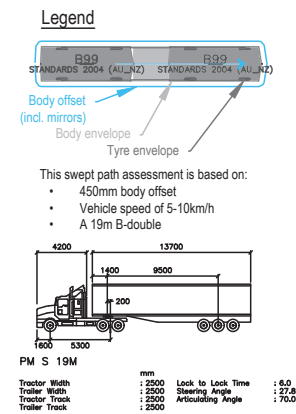
Project: 33 Violet Street, Revesby	Drawn: ZM	Figure No.: 1
Date: 09-02-2026	Checked: JR	

Proj No: 19917	Scale: 1:450	Version: final
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APPENDIX G

VEHICLE SWEEP PATHS





v	Description	Date
1.0	Preliminary draft	22/05/2026
2.0	Final	02/06/2026

Prepared for:



Quality information

Date	05/26
Prepared	SC
Reviewed	NB
Authorised	NB

Scale @ A3



Scale 1:250

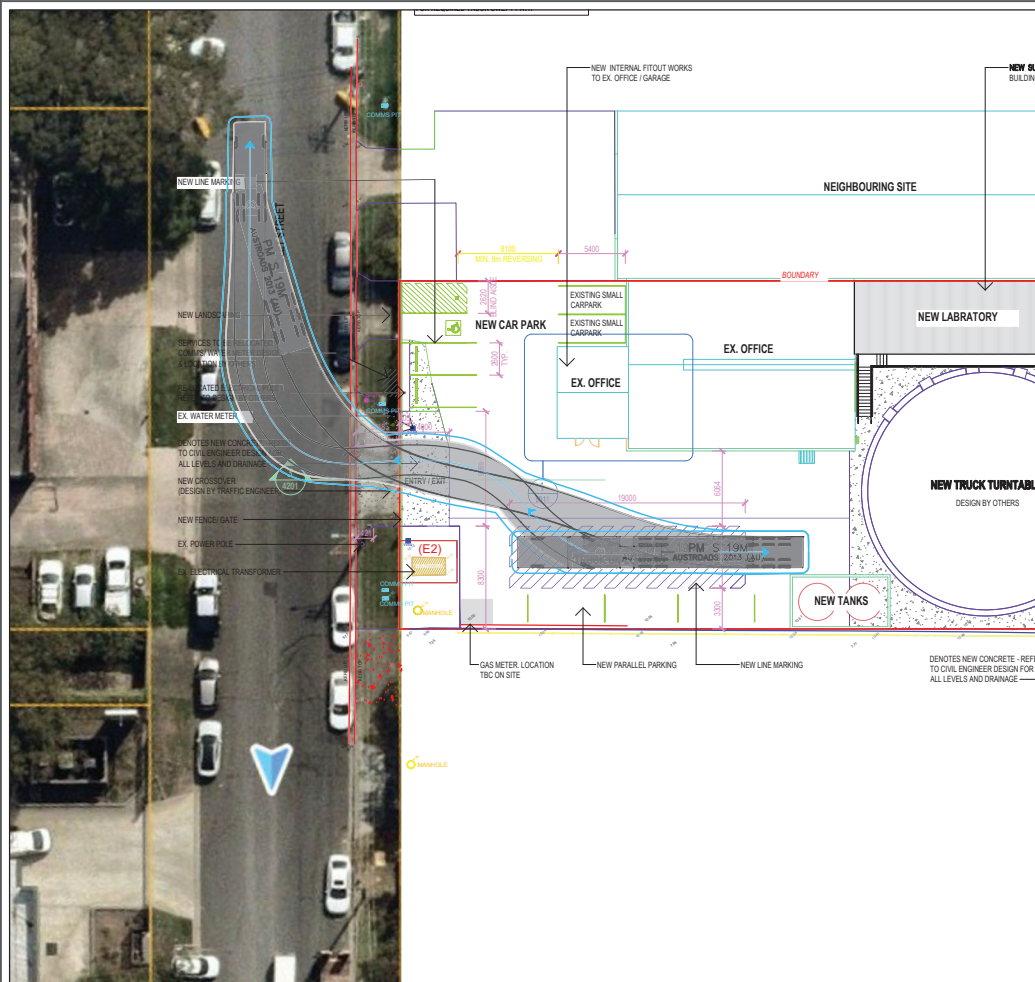
Project	SCT 00897 IXOM Revesby
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Title **Swept Path Assessment**
Vehicle parking within the site

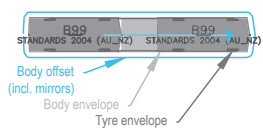
Project Number
SCT_00897_CAD_01

Sheet number	01
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A3

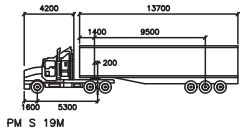


Legend



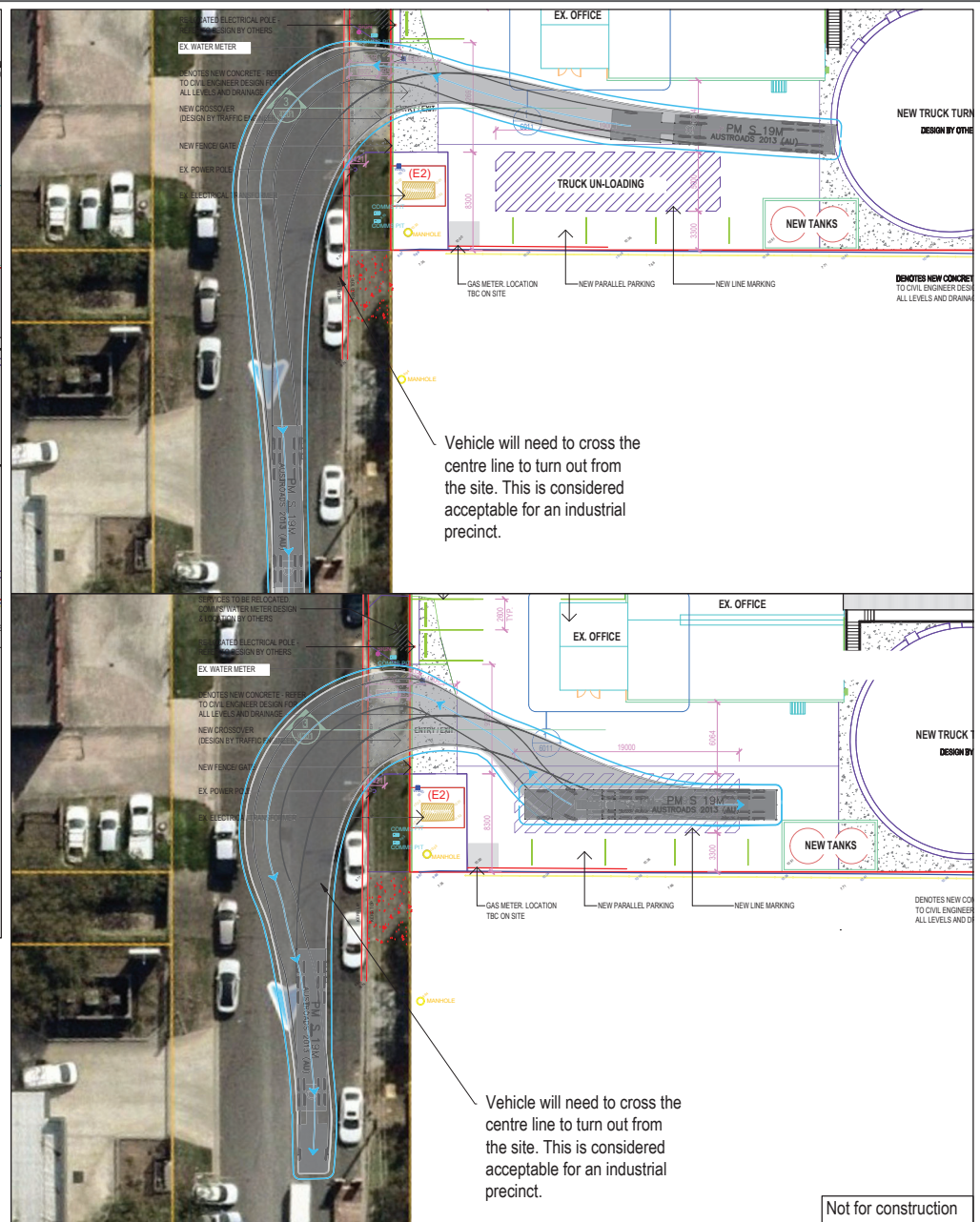
This swept path assessment is based on:

- 450mm body offset
- Vehicle speed of 5-10km/h
- A 19m B-double



PM S 19M

Tractor Width	2500	Lock to Lock Time	8.0
Tractor Height	2500	Steering Angle	27.8
Tractor Track	2500	Articulating Angle	70.0
Tractor Track	2500		



Vehicle will need to cross the centre line to turn out from the site. This is considered acceptable for an industrial precinct.

Vehicle will need to cross the centre line to turn out from the site. This is considered acceptable for an industrial precinct.

Not for construction



v	Description	Date
1.0	Preliminary draft	22/05/2026
2.0	Final	02/06/2026

Prepared for:



Quality information

Date	05/26
Prepared	SC
Reviewed	NB
Authorised	NB

Scale @ A3



Scale 1:400

Project SCT_00897_ IXOM Revesby

Title Swept Path Assessment
Vehicle exit

Project Number SCT_00897_CAD_01

Sheet number 01



A3

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