FUEL SYSTEM OPERATION PLAN

74-76 Seville Street Fairfield East, NSW 2165, NSW

Prepared for:

Hassani Investments Pty Ltd & Hussain Group Investments Pty Ltd
C/- Hamptons Property Services
Suite 404, 203-233 New South Head Road,
EDGECLIFF NSW 2027

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Hassani Investments Pty Ltd & Hussain Group Investments Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
610.18609.00001-R01-v1.1	8 May 2020	June Lee	Hugh Selby	Hugh Selby
610.18609.00001-R01-v1.0	17 February 2020	June Lee	Hugh Selby	Hugh Selby
610.18609.00001-R01-v0.1	20 January 2020	Jason Roesler	June Lee	-

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DOCUMENT REFERENCES

APPENDICES

CONTENTS

1 Introduction

SLR Consulting Australia Pty Ltd (SLR) was engaged by Hassani Investments Pty Ltd & Hussain Group Investments Pty Ltd (the client) to prepare a Fuel System Operation Plan (FSOP) for an underground petroleum storage system (UPSS) located in the central portion of the site described as 74-76 Seville Street, Fairfield East, NSW 2165 (Parcel Reference: Lot 10 of Deposited Plan (DP) 1090834). The site location and UPSS location are presented on Figure 1 and Figure 2, respectively in **Appendix A.**

The FSOP presented herein (Sections 2 to 9) is prepared by using the NSW EPA *Storage system information for UPSS* template, which is intended to comply with the requirements in the Development Application No. DA 300.1/2019. The FSOP is a requirement under clause 18 of the *Protection of the Environment Operations (UPSS) Regulation 2019* (UPSS Regulation).

This document (FSOP) must be accessible and contain current procedures and records specific to the UPSS on the site.

2 Storage System Information

Site name	Metro Express Car Removals Pty Ltd
Site street address	74-76 Seville Street, Fairfield East, NSW 2165

Land title particulars	
Lot number	10
DP number	1090834
Person responsible*	ILIAS HASSANI
Postal address**	76 Seville Street, Fairfield East, NSW 2165
24-hour phone number***	0434 450 140

*If person responsible is a corporation, the name of a person who is authorised to act on behalf of the corporation

**For person responsible, may differ from site address

***For person responsible or company contact person

Name of site owner	Hassani Investments Pty Ltd & Hussain Group Investments Pty Ltd

Access and security information

Details of access to, and security of, the systems, including any locks, gates, fences, etc and the means of opening them.

The site is open 10 hours a day. Access is via the gates on 74 Seville Street.

Whether there are site-specific exemptions, this information will be updated on site accordingly.

Location of all records kept in accordance with Part 5 of the UPSS Regulation 2019, especially specifics of any offsite storage of records

Part 5, Clause 22: Record of significant modifications

Record	Location
Comprehensive description of the modification	Records not available refer to Appendix E.
The dates of commencement and completion of the modification	Records not available refer to Appendix E.
Results of the equipment integrity test carried out under clause 13	Records not available refer to Appendix E.
The current "as-built" drawings for the system must be revised to reflect the modification	Records not available refer to Appendix E.

Part 5, Clause 25: Incident log

Record	Location
Incident log for the storage system (containing the matter required by this clause).	74 Seville Street. Refer to Appendix B.
A notification under Part 5.7 of the Act of a pollution incident involving a storage system is to be made in a form approved by the appropriate regulatory authority.	Refer to Appendix B.

Note: (from Clause 25)

The following activities and incidents must be recorded in the incident log of a storage system:

a) The carrying out of any activity, by a person acting otherwise than at the direction or request of the person responsible for the system, that has affected, is affecting or could affect the integrity of the system

b) The occurrence of any unplanned or abnormal incident (including operational disruptions or equipment failures) that has affected, is affecting or could affect the long-term safety of the system.

Part 5, Clause 26: Documents to be kept for 7 years from date of creation

Record	Location
Validation report to be prepared after tank removed or replaced	Records to be held onsite at 74 Seville Street, Fairfield.
Data produced by any measuring instrument (all gauges, indicators and other measuring instruments in the system)	Records to be held onsite at 74 Seville Street, Fairfield.
Records of loss detection	Records to be held onsite at 74 Seville Street, Fairfield.
Document of monitoring data related to groundwater monitoring wells	Records to be held onsite at 74 Seville Street, Fairfield.
Record of any notification given to the appropriate regulatory authority of a pollution incident involving the storage system	Records to be held onsite at 74 Seville Street, Fairfield.

Note: (from Clause 26)

For the purpose of this clause, required document, in relation to a storage system, means any of the following:

a) A document containing the results of equipment integrity tests for the system carried out under clauses 9 *Installation of new storage systems - Equipment integrity test to be performed*, 13 *Modification of storage systems - Equipment integrity test to be performed* or 14 *Repair of storage systems – Equipment integrity test to be performed*

b) A document containing the data produced by any measuring instrument referred to in clause 19

c) A document containing details of action taken under clause 21 *Loss detection procedures*

d) A report prepared for the system under clause 23 *Record of significant modifications*

e) A notification that is given to the appropriate regulatory authority of a pollution incident involving a storage system

f) Anything that was a required document for the purpose of clause 25 of the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2014* immediately before its repeal.

Part 5, Clause 27: Documents to be kept for seven years from date of decommissioning

The existing UPSS is still in operation. No documents kept at present time related to the decommissioning of the storage system.

Record	Location
Validation report to be prepared after system decommissioned	Not available (NA)
Equipment integrity certificates	NA
Record of significant modifications	NA
Each version of fuel system operation plan	NA
Incident log	NA
Groundwater monitoring well report	NA

Any report undertaken as a consequence of action taken in relation to pollution incident involving the storage system	NA

Note: (from Clause 27)

For the purpose of this clause, required document, in relation to a storage system, means any of the following:

a) Each certificate issued for the system under clauses 9 *Installation of new storage systems - Equipment integrity test to be performed*, 13 *Modification of storage systems - Equipment integrity test to be performed* or 14 *Repair of storage systems – Equipment integrity test to be performed*

b) A leak detection system report referred to in clause 17 *Storage system not to be used unless leak detection system properly installed*

c) Each version of the fuel system operation plan prepared for the system under clause 18 *Storage system not to be used unless fuel system operation plan documentation in place*

d) A record made in relation to the system under clause 22 *Record of significant modifications*

e) A report prepared for the system under clause 23 *Record of significant modifications* or 24 *Report to be prepared after tank removed or replaced*

f) The incident log kept for the system under clause 25 *Incident log*

g) A report that has been made as a consequence of action taken under Part 5.7 of the Act in connection with a pollution incident involving system

h) Anything that was a required document for the purpose of clause 26 of the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2014* immediately before its repeal.

Date	17 February 2020	**Revision #**	1.0

When completed, this form meets the information requirements of Clause 18 (3) and must be retained onsite as part of the FSOP.

Download another form from the EPA when this information needs to be updated. Forms can be downloaded at www.epa.nsw.gov.au/your-environment/contaminated-land/preventing-contaminated-land/upss-fuel-system-operation-plan

As required by Clause 18 of the UPSS Regulation, use this folder to keep together the up-to-date documents that must be retained on premises where an UPSS is located.

The UPSS Regulation requires development of a FSOP for a UPSS that must be retained onsite. The FSOP must contain the documented procedures and records relating to the UPSS that are specified in Clause 18 of the UPSS Regulation.

Extracts from Clause 18 (and the sections of this folder where you can store your documents)

Clause 18 (1)

"A storage system must not be used otherwise than in accordance with a Fuel System Operation Plan that this is place in relation to the system."

Clause 18 (3)

"…information to be included in the Fuel System Operation Plan…" (Section 2)

Clause 18 (2)

"A storage system's Fuel System Operation Plan must include:

- *A loss monitoring procedure (Section 3)*
- *A maintenance schedule (Section 5)*
- *The current 'built in' drawings for the system (Section 6)*
- *A plan of the storage site … (Section 7)*
- *A copy of each list of industry standards [that have been followed] … (Section 8)*
- *A copy of all specifications [used] …" (Section 9)*

Clause 18 (6)

"A storage system's Fuel System Operation Plan

- *Must comply with EPA guidelines,*
- *Must be updated as occasion requires, and*
- *Must be kept on the storage site."*

Use this folder to contain the procedures and records required by the UPSS Regulation. The contents of the folder may be audited by the appropriate regulatory authority.

If you would like a copy of the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019, visit the NSW Legislation website at www.legislation.nsw.gov.au.

If you would like a copy of the UPSS guidelines, visit the EPA website at www.epa.nsw.gov.au/your-environment/contaminated-land/preventing-contaminated-land/upss/resources-for-implementing-upss or phone the Environment Line on 131 555.

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59—61 Goulburn Street, Sydney NSW
PO Box A290 Sydney South
Phone 02 9995 5000 (switchboard) Phone 131 555
Email: info@environment.nsw.gov.au
Website: www.epa.nsw.gov.au
EPA 2019P1789
August 2019
The EPA disclaimer and copyright information is available on the EPA website.

3 Loss monitoring system

A loss monitoring system must be able to compare the amount of fuel that should be in an Underground Storage Tank (UST) against the amount of fuel that is actually in it.

The loss monitoring system should be designed to detect losses of petroleum by measuring discrepancies between

- The amount of petroleum that should be in the system, and
- The amount of petroleum that is actually present in the system.

The principal purpose of UPPS loss monitoring is to support the early detection of losses from UPSS with a view to prompting timely investigation of losses to minimise economic loss and/or environmental harm. UPSS loss monitoring provides a mechanism for the early detection of system leaks. Fuel leaks that go undetected over time can cause significant environmental damage and the longer the leaks go undetected.

Statistical monitoring of UPSS fuel levels relative to fuel use (i.e. 'ins and outs') and the physical monitoring of contaminant concentrations in nearby groundwater (i.e. liquid fuel) or soil (i.e. vapours).

The loss monitoring system must comply with section 4.5 (AS4897-2008) and clause 18 (4) of the UPSS Regulation. As the use of the UPSS onsite is expected to be limited, manual wet stock reconciliation is proposed through gauging of the USTs (see **Section 3.1**). If use of the UPSS increases, through increases to the amount of fuel delivered and used, then consideration will be given to automated inventory reconciliation and statistical inventory reconciliation analysis.

3.1 Tank Gauging (manual wet stock reconciliation)

This form of loss monitoring involves:

1. using a dip stick (with 100L increments) to manually dip each UST to measure fuel levels.
    a. If fuel levels are <5,500 litres then manual dipping should occur at least once per month and over a 36 hour period (where the UST is gauged at the start and end of the 36 hours)
    b. If fuel levels are >5,500 litres then manual dipping should occur daily
    c. Measurements are to be recorded on a register including the date, time, fuel level and person undertaking the measurement. This record must be maintained onsite.
2. calculating whether fuel is lost, or water gained, after accounting for fuel extraction and additions.
    a. Manual wet stock reconciliation requires the operator to demonstrate the process can detect any loss from the system at or above 0.76 litres per hour with at least a 95% accuracy

Whilst this process is less accurate than automated systems due to variables such as dip stick calibration and thermal expansion of fuel, there is expected to be limited use of the USTs. If there is a discrepancy in the fuel levels, then the reasons must be investigated and recorded in this FSOP.

3.2 Statistical Inventory Reconciliation Analysis

Statistical inventory reconciliation analysis (SIRA) is to be undertaken if use (fuel delivered and used) of the UPSS increases.

SIRA is a best practice method of loss monitoring using computer software to conduct ongoing statistical analysis of fuel inventory, delivery and dispensing data.

SIRA is to be provided by a specialist third party provider. A monthly report flags data inconsistency and possible leaks in the system are flagged immediately.

If the loss monitoring system detects a discrepancy in fuel levels or a fail notification is received from SIRA, all possible reasons are to be investigated and recorded as part of this FSOP.

3.3 Equipment Integrity Testing

It is recommended that Equipment Integrity Testing (EIT) is undertaken every two (2) years to measure the containment integrity of each UST, fittings and lines. EIT generally involves a specialist provider applying pressure or a vacuum to the UPSS and measuring any pressure changes.

4 Leak detection

A leak detection system acts as a backup in case the loss monitoring system fails to detect a leak from the UPSS. UPSS cannot be used unless a leak detection system is in place. The leak detection system must be designed by a duly qualified person and comply with section 4.5.7 of the Australian Standard – The design, installation and operation of underground petroleum storage systems (AS4897-2008) and UPSS Regulation Part 3 and clause 20.

4.1 Groundwater Monitoring Wells

The EPA preferred leak detection system of groundwater monitoring wells will be adopted. This requires:

- installation of a minimum of three (3) groundwater monitoring wells. One (1) well upgradient and two (2) wells down gradient, of the three (3) underground storage tanks (UST)
- Groundwater monitoring (gauging and sampling) to be conducted at least every six (6) months for evidence of fuel contamination and absence of chemicals of concern COC. This will include:
- In each well, gauging the standing water level (SWL) and potential free-phase petroleum hydrocarbons with an interface probe
- Collecting a groundwater sample from each well and submitting the sample for analysis at a NATA accredited laboratory on Total Recoverable Hydrocarbons (TRH), Benzene, Toluene, Ethyl-benzene, Xylenes, Naphthalene (BTEXN) and lead.

The results of groundwater monitoring will be recorded in the FSOP and kept for at least seven years after the date the tests occurred.

5 Incident management procedure

The incident management procedure must set out the steps to be followed when dealing with any leaks and spills of petroleum from the underground petroleum storage system.

Refer to **Appendix B**.

6 Maintenance schedule

The maintenance schedule must include details of what maintenance is proposed to be carried out, and when. This is in relation to the storage system generally and the various gauges, indicators, groundwater monitoring wells and other measuring instruments in the system.

Under clause 20 of the UPSS Regulation, a storage system must not be used unless all gauges, indicators, probes, sensors and any other measuring instruments in the system are checked and maintained (and where necessary calibrated) in accordance with the manufacturer's specifications and/or the maintenance.

All data produced by any measuring instruments of a UPSS must be retained by the person responsible for at least seven years from when the data was produced, in accordance with clause 25 of the UPSS Regulation.

Where the person responsible changes (such as through sale, transfer of ownership of the site or business or contractual changes), all documents must be transferred to the new person responsible, in accordance with clause 27 of the Regulation and the FSOP retained onsite.

Frequency of equipment integrity testing (EIT) will occur immediately following any modification (upgrade), repair or reuse of tanks and/or piping and as necessary from time to time to assess whether a UPSS is leaking or has been.

Loss monitoring and groundwater monitoring results will be used to determine whether a UPSS is losing or gaining volume. Where appropriate, these results will be used to determine whether an EIT is necessary.

Under the Work Health and Safety Regulation 2011 (Section 367), an underground storage system must be abandoned if it's no longer intended to be used or has not been used for 2 years.

Should the client choose to not add to or extract product from the UPSS, to clarify stakeholder roles and responsibilities in the decommissioning, abandonment and removal requirements of UPSS in line with relevant legislation, policies and industry best practice refer flow chart presented in **Appendix C** as extracted from UPSS Technical Note: Decommissioning, Abandonment and Removal of UPSS. https://www.epa.nsw.gov.au/your-environment/contaminated-land/upss/resources-for-implementing-upss

Refer to **Appendix E** for communication related to the required information.

7 Current 'as-built' drawings for the system

These are detailed site plans (to a recognisable scale) which depict the final installed configuration of any part of a UPSS and any construction deviations showing all features of the storage site as currently built. This does not include the pre-constructed drawings.

The date of the plan should be included.

Refer to **Appendix E** for communication related to the required information.

Refer to **Appendix F** for Dangerous Goods Search for the location and size of UPSS infrastructure

8 Plan of the storage site

This plan should show the locations of each of the following:

- the storage system
- all buildings and associated infrastructure
- all fences and gates
- all groundwater monitoring wells (including any codes by which they are designated)
- any unsealed ground surfaces.

A 'Targeted Environmental Investigation' report was prepared by KPMG-SGA in April 2018. The report included: (i) a site layout showing the approximate locations of the bowsers, USTs and Vehicle Workshop, and (ii) photograph logs of various parts of the site (including refuelling area, LPG aboveground storage tank, vehicle workshop, and retaining wall on the eastern boundary). This information is included in **Appendix D**.

Refer to **Appendix F** for Dangerous Goods Search for the location and size of UPSS infrastructure

9 Industry standards

A copy of each list of industry standards that have been followed in connection with each of the following:

- The design of the system
- The installation of the system
- The design of any modification
- The implementation of any modification

or

In the absence of a list of industry standards, documented evidence that the person responsible for the system has taken all reasonable steps to obtain such a list.

Refer to **Appendix E** for communication related to the required information.

Refer to **Appendix F** for Dangerous Goods Search for the location and size of UPSS infrastructure

10 Specifications

A copy of all specifications used and referred to, including:

- The design specifications for the system
- The installation specifications for the system
- The design specifications for any modification, and
- The implementation specifications for any modification.

or

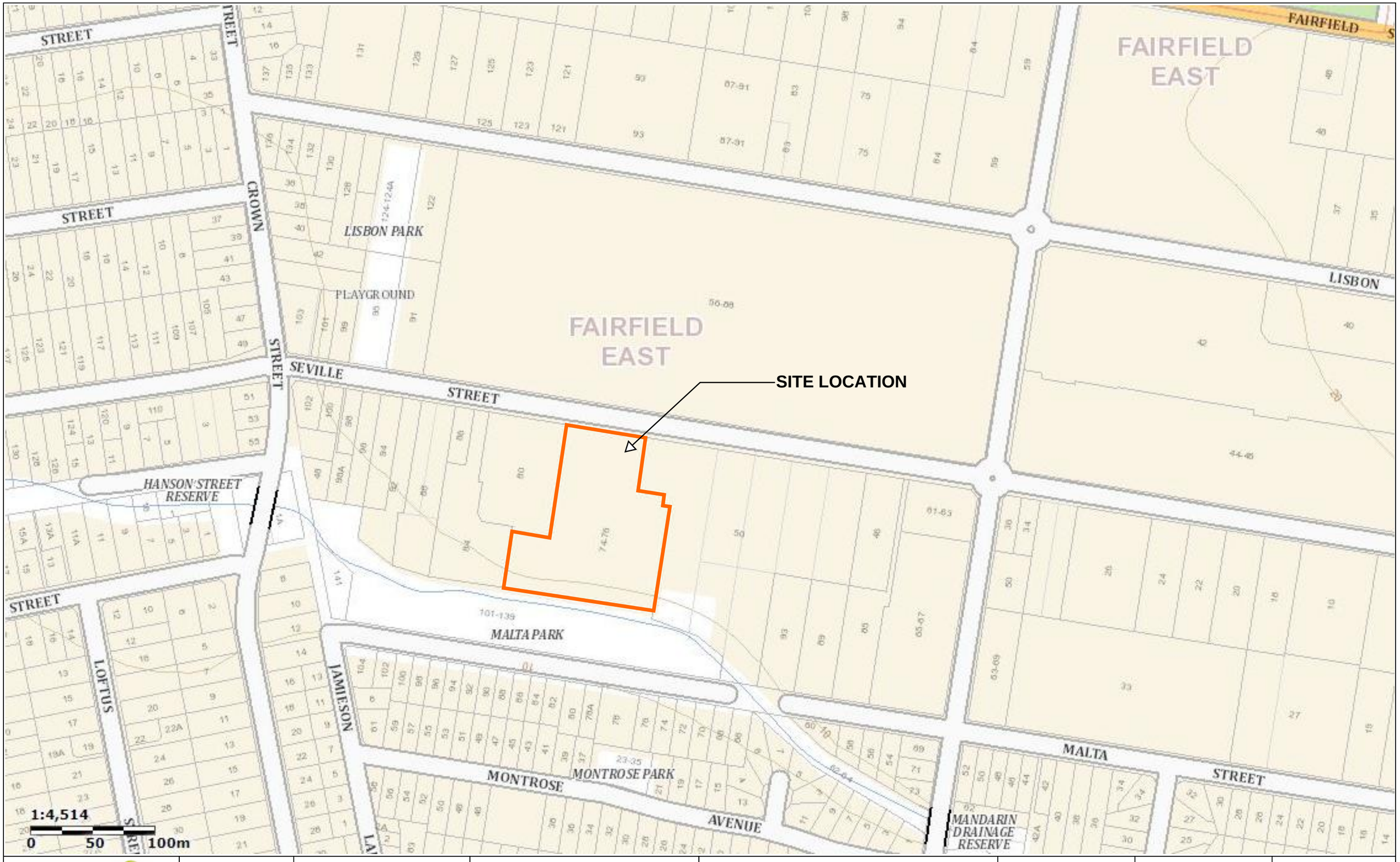
In the absence of a copy of specifications, documented evidence that the person responsible for the system has taken all reasonable steps to obtain such copies.

Refer to **Appendix E** for communication related to the required information.

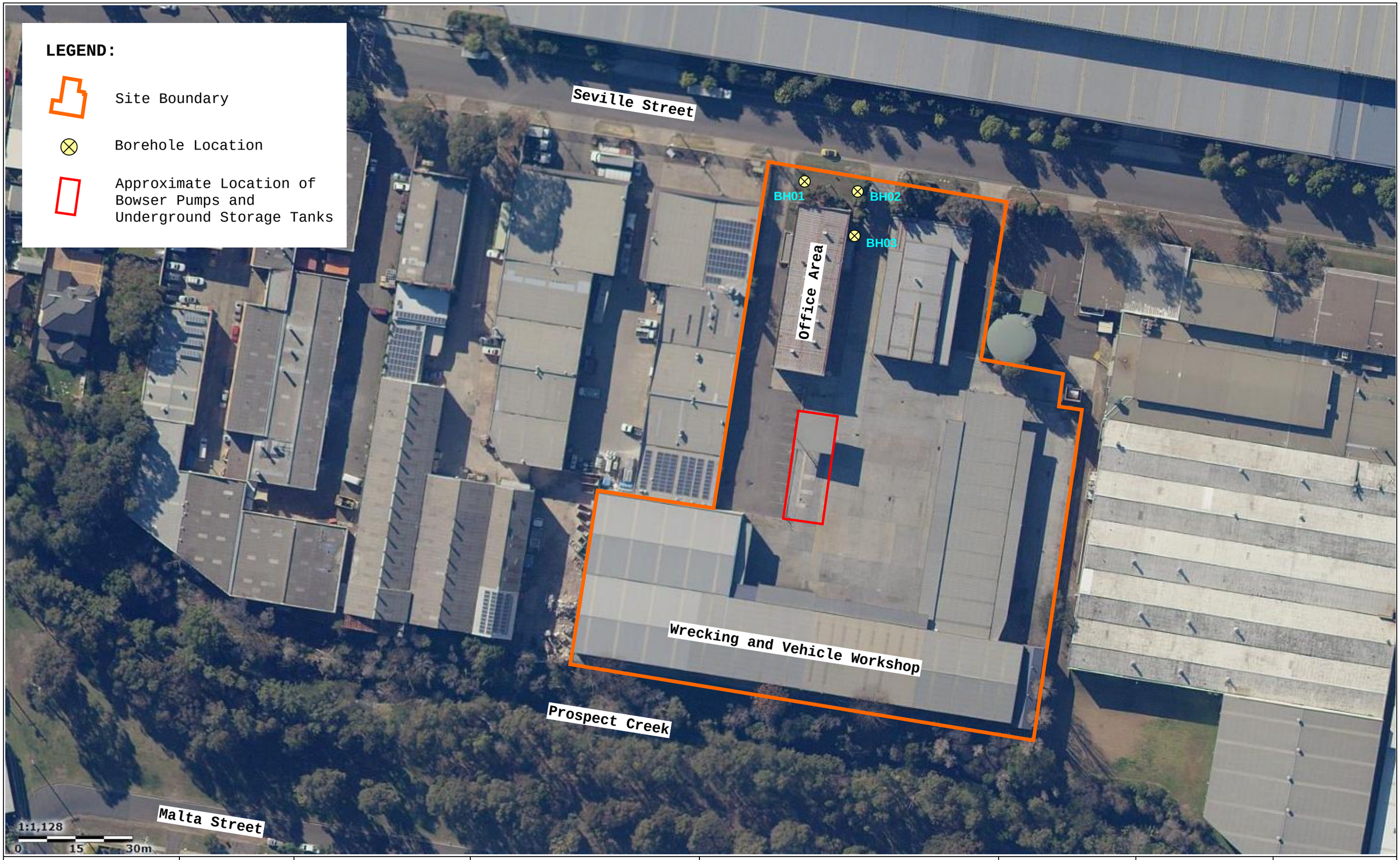
Refer to **Appendix F** for Dangerous Goods Search for the location and size of UPSS infrastructure

APPENDIX A

Figures



SLR	2 Lincoln Street, Lane Cove, NSW 2066 Australia	T: +61 2 9428 8100 sydney@slrconsulting.com www.slrconsulting.com	**Preliminary Site Investigation** Ref: 610.18609.00000	**Proposed Waste Transfer Station and Resource Recovery Facility** **74-76 Seville Street Fairfield East, NSW**	14 February 2019	**Figure 1 Site Locality**



SLR	2 Lincoln Street, Lane Cove, NSW 2066 Australia	T: +61 2 9428 8100 sydney@slrconsulting.com www.slrconsulting.com	**Preliminary Site Investigation** Ref: 610.18609.00000	**Proposed Waste Transfer Station and Resource Recovery Facility** **74-76 Seville Street Fairfield East, NSW**	14 February 2019	N	**Figure 2** **Site Layout & Investigation Locations**

APPENDIX B

Incident Management Procedure

1 Purpose of document

The purpose of this document is to set out the steps to be followed when dealing with any leaks and spills of petroleum from the underground petroleum storage system (UPSS).

2 Scope

This document provides a strategy for the containment and recovery of all foreseeable spills at the site.

3 Potential Site Hazards and Incidents

The potential hazards to human health and the environment may occur from incidents on the site such as:

- Explosion or fire
- Escape, spillage or leakage of hazardous substances
- Leak / spillage of contaminated stormwater
- Truck collision / spill on site

The possible circumstances or events that could increase the likelihood of the hazards occurring are described in **Table A**.

Table A Hazards and circumstances that could increase the likelihood of their occurrence

Hazards	Circumstances or events that could increase the likelihood
Explosion or fire	- Working in high fire danger periods
Escape, spillage or leakage of hazardous substances	- Failure of storage tanks - Failure of bunded areas - Machine failure
Leak / spillage of contaminated stormwater	- Failure of storage tanks - Periods of high rainfall
Truck collision / spill on site	- Unsafe driving (e.g. speeding) - Driver(s) affected by alcohol or other drugs

4 Pre-Emptive Actions to Minimise/Prevent Any Risk of Harm

Table B presents a list of the key pre-emptive actions applicable to the site to minimise the risk of potential hazards and incidents. In addition, all employees and contractors are to wear appropriate Personal Protective Equipment (PPE) and undergo appropriate safety and environmental training.

Table B Pre-emptive actions applied on site to minimise the risk of potential hazards

Hazards	Pre-emptive Actions
Explosion or fire	- Staff induction and training - General purpose fire extinguishers and fire extinguishers suitable for oil/fuel fires are available in all offices, plant and vehicles - Site personnel to familiarised or be trained in the use of fire-fighting equipment - Fire-fighting equipment will be maintained regularly - Fire detection systems will be in place and regularly inspected with each building
Escape, spillage or leakage of hazardous substances	- Staff induction and training - Refuelling of plant and equipment will occur in impervious bunded areas away from drainage lines and waterways - Spill kits will be kept at site compound areas and onsite during high risk activities - All fuel stores will be appropriately bunded - All bunded areas will be inspected regularly - All plant will be inspected regularly for leaks - All appropriate Safety Data Sheets (SDS) will be kept onsite and be readily accessible
Leak / spillage of contaminated stormwater	- Staff induction and training - An Environmental Work Method Statement (EWMS) will be created for any works within waterways (including culverts) or that have a high risk of waterway contamination - All bunded areas will be inspected regularly - An Erosion and Sediment Control Plan will be developed and implemented for the site
Truck / vehicle collision	- Staff induction and training - A Vehicle Movement Plan (VMP) will be produced for all ancillary and work sites - All vehicle operators and delivery drivers will be provided a copy of the VMP prior to arrival onsite - Emergency services will be contacted as necessary - First Aid kits will be kept in each vehicle and plant as well as in the site

5 Incident Management

5.1 Pollution Incident

A pollution incident is defined in the *Protection of the Environment Operations Act 1997* (POEO Act) as:

"*an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.*

It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise."

5.2 Material Harm

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is identified in section 147 of the POEO Act as:

"(i) it involves actual or potential harm to the health or safety or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment".

5.3 Duty to Notify Management Personnel

All employees and contractors are responsible for **immediately** alerting management personnel (Site Supervisor or Site Manager) to all environmental incidents or hazards which may result in an environmental incident, regardless of the nature or scale.

5.4 Key Site Contacts

The contact details for key individuals who are responsible for activating the signal, including notifying authorities and managing the response to all pollution incident is provided in **Table C** below.

Table C Key Site Contacts

Name	Role	Mobile Number
ILIAS HASSANI	Site Supervisor	0434 450 140
To Be Advised (TBA)	Environmental Site Representative	TBA
TBA	HSEQ Manager	TBA

6 Incident Response

6.1 Response Protocol

As soon as a worker becomes aware of a pollution incident they would **immediately** contact a person responsible for managing the site. If there is an immediate threat to human health or property, the Site Manager would **immediately** contact emergency services.

The nominated Environmental Site Representative would determine if the incident is likely to cause material harm to the environment. If material harm is likely, external contacts would be notified **immediately**.

The HSEQ Manager will assist in making an assessment of the incident and determine whether or not to formally notify the incident to the EPA and other relevant authorities.

If no assistance can be obtained within a reasonable time, the staff is required to notify the relevant authorities in the order of notification in **Table D** below.

Table D Relevant Authority's Notification Order

If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance	
- **Fire and Rescue NSW** (call first)	**000**
- EPA Environment Line	131 555
- SafeWork NSW	131 050
If there is not an immediate threat to human health or property	
- EPA Environment Line (call first)	131 555
- SafeWork NSW	131 050
- Fire and Rescue NSW	1300 729 579

6.2 Post-incident Notification Procedure

The following general clean-up procedure is to be followed:

1) Assessment – Assess the best clean-up procedure for each incident based on the pollutant and site issues

2) Remedial Action – Remove contaminated soil, wastewater and use spill equipment to an appropriate place within the licensed premise for licensed waste disposal and/or remediation

3) Ongoing Actions – Following an incident, the following must be undertaken:
    - Undertake further monitoring/testing (if required)
    - Organise restocking of spill kit/equipment
    - Complete reports to Authorities, as necessary
    - Implement corrective actions to avoid reoccurrence

6.2.1 Incident Reporting to the Environment Protection Authority (EPA)

Within seven (7) days from the date on which the incident occurred, a detailed report must be submitted to the EPA including the following information:

- Describe the date, time and nature of the incident
- Identify the cause (or likely cause) of the incident
- Describe what action has been taken to date
- Describe the proposed measures to address the incident

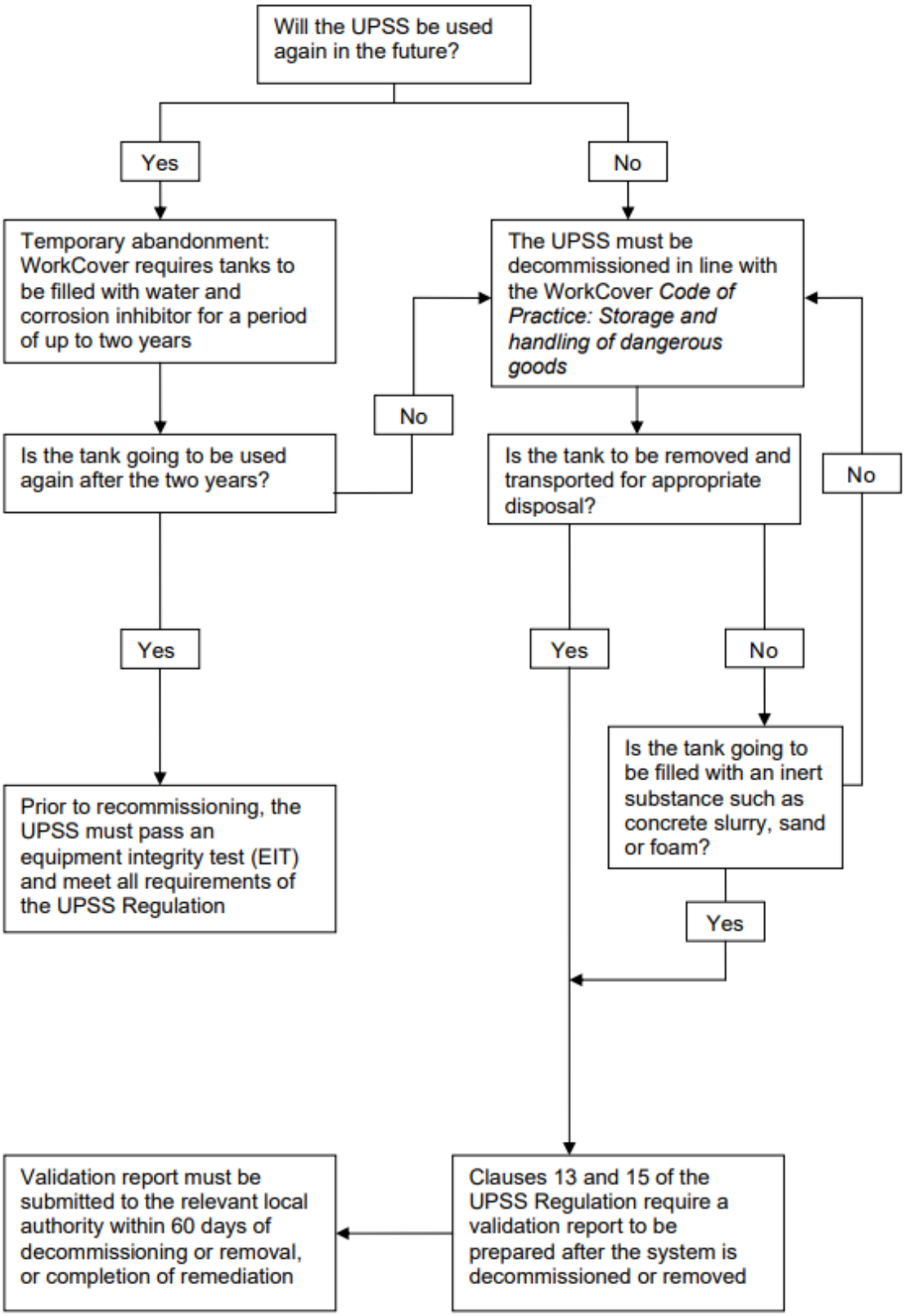
If any of the information was not known at the time of initial reporting of the pollution incident to any of the Authorities, that information should be notified to the Authorities immediately after it becomes known.

6.3 Incident Log

Date and Time	Person Attending	Summary Description of Incident	List of Actions

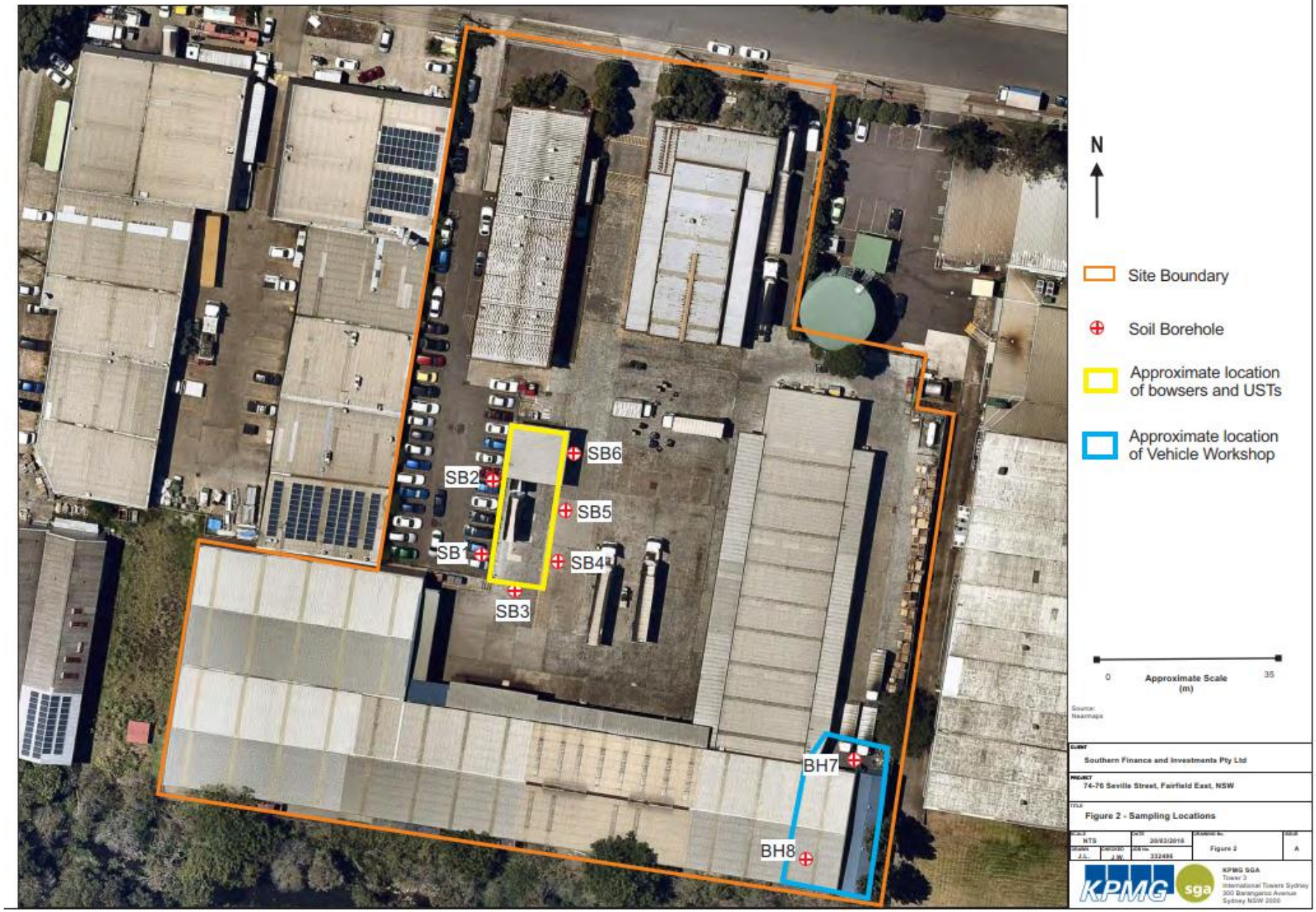
APPENDIX C

UPSS Flowchart


Will the UPSS be used again in the future?
Yes
No
Temporary abandonment: WorkCover requires tanks to be filled with water and corrosion inhibitor for a period of up to two years
The UPSS must be decommissioned in line with the WorkCover *Code of Practice: Storage and handling of dangerous goods*
No
Is the tank going to be used again after the two years?
Is the tank to be removed and transported for appropriate disposal?
No
Yes
Yes
No
Is the tank going to be filled with an inert substance such as concrete slurry, sand or foam?
Yes
Prior to recommissioning, the UPSS must pass an equipment integrity test (EIT) and meet all requirements of the UPSS Regulation
Validation report must be submitted to the relevant local authority within 60 days of decommissioning or removal, or completion of remediation
Clauses 13 and 15 of the UPSS Regulation require a validation report to be prepared after the system is decommissioned or removed

APPENDIX D

Site Layout and Photograph Logs


N
Site Boundary
Soil Borehole
Approximate location of bowsers and USTs
Approximate location of Vehicle Workshop
SB6
SB2
SB5
SB1
SB4
SB3
BH7
BH8
0
Approximate Scale (m)
35
Source: Nearmaps
Southern Finance and Investments Pty Ltd
74-76 Seville Street, Fairfield East, NSW
Figure 2 - Sampling Locations
NTS
20/03/2018
Figure 2
A
J.L.
J.W.
332486
KPMG SGA
Tower 3
International Towers Sydney
300 Barangaroo Avenue
Sydney NSW 2000

Targeted Environmental Investigation
74-76 Seville Street, Fairfield East, NSW
Southern Finance and Investment Pty Ltd
9 April 2018

Refuelling area located in the central portion of the site.

Bunded refuelling area and bowsers.

LPG AST located on eastern boundary. .

UST mark up utilising ground penetrating radar.

Vehicle workshop located on south-eastern corner of the site.

Retaining wall located on eastern boundary.

APPENDIX E

Communications

From: Vidhya Ramesh <VidhyaR@hamptonspropertyservices.com.au>
Sent: Wednesday, 29 January 2020 1:15 PM
To:
Subject: FW: 2018101 - 74 - 76 Seville Street, Fairfield East - RFI

Hi,

The client advised that he was unable to obtain the as-built drawings. Please see email below.

Kind regards,
Vidhya Ramesh
Project Manager

Head Office: Suite 404, 203-233 New South Head Road, Edgecliff 2027
Parramatta Office: 4103/11 Hassall Street, Parramatta 2150
Postal Address: PO Box 954 Edgecliff NSW 2027
m: 0414 468 700 | p: 02 9386 7004
e: VidhyaR@hamptonspropertyservices.com.au
w: www.hamptonspropertyservices.com.au | Connect with me on LinkedIn

From: ILIAS HASSANI [mailto:iliashassani1@gmail.com]
Sent: Friday, 24 January 2020 9:36 AM
To: Vidhya Ramesh <VidhyaR@hamptonspropertyservices.com.au>
Cc: Kristy Hodgkinson <Kristyh@hamptonspropertyservices.com.au>; Lance Hodgkinson <lanceh@hamptonspropertyservices.com.au>
Subject: Re: 2018101 - 74 - 76 Seville Street, Fairfield East - RFI

Do you think EPA might have that information as I believe when such tanks are installed the drawings and reports must be submitted to EPA.
Thank you

On Fri, Jan 24, 2020 at 9:32 AM ILIAS HASSANI <iliashassani1@gmail.com> wrote:

> Hi Vidhya
>
> I couldn't find built in plan for the UPSS despite doing whatever we could.
> I contacted the agent, solicitor, my solicitor and more but none of them has the drawing.
> As you may know we haven't used the tanks and don't have sufficient information to complete the report.
>
> Is there any other ways we could get the built in plan or perhaps get someone to check and do the drawings?
> Thank you
>
> On Fri, Jan 24, 2020 at 9:25 AM Vidhya Ramesh <VidhyaR@hamptonspropertyservices.com.au> wrote:
>
> > Hi Ilias,

Please find attached the draft FSOP for your review.

If you could please provide your response for the items highlighted in green.

Also, any luck with the drawings?

Kind regards,

Vidhya Ramesh

Project Manager

hamptons property services

Head Office: Suite 404, 203-233 New South Head Road, Edgecliff 2027

Parramatta Office: 4103/11 Hassall Street, Parramatta 2150

Postal Address: PO Box 954 Edgecliff NSW 2027

m: 0414 468 700 | p: 02 9386 7004

e: VidhyaR@hamptonspropertyservices.com.au

w: www.hamptonspropertyservices.com.au|Connect with me on LinkedIn

--

> Regards
> Ilias Hassani

--
Regards
Ilias Hassani

APPENDIX F

Dangerous Goods Search

Application for Licence to Keep
Dangerous Goods

Application for: New Licence ☐ Amendment ☑ Transfer ☐ Renewal of expired licence ☐

RECEIVED
04 FEB 2005
WORKCOVER
NEWCASTLE

PART A - *Applicant and site information* (See page 2 of Guidance Notes)

1 Name of applicant — ACN
Ross Freight P/L — 003775648

2 Postal Address of Applicant — Suburb/Town — Postcode
74-78 Saville St — Villawood — NSW — 2163

3 Trading Name or Site Occupier's Name
Ross Freight P/L

4 Contact for Licence Inquiries
Phone — Fax — Name
02 9794 7666 — 02 9794 7688 — Michael James

5 Previous Licence Number (if known)
35/ 034956

6 Previous Occupier (if known)

7 Site to be Licensed
No Street
74-78 Saville St Villawood

8 Main Business of Site
Transport Road Freight

9 Site staffing: Hours per day 12 — Days per week 5

10 Site Emergency Contact
Phone — Name
(0)0403 066 553 — Michael James.

11 Major Supplier of Dangerous Goods
Elgas.

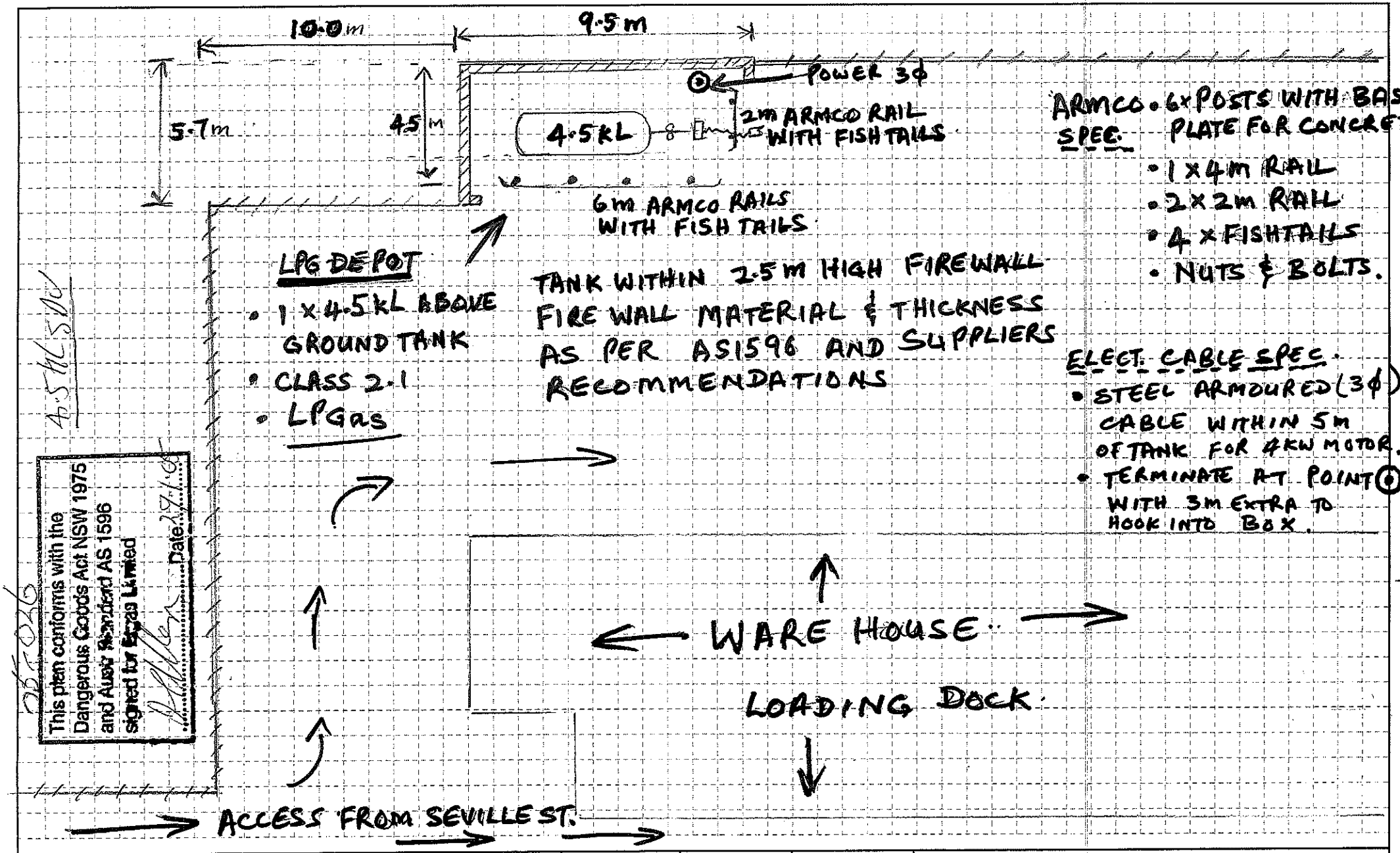
12 If a new site or for amendments to depots - see page 4 of Guidance Notes.
Plans Stamped by: — Name of Consultant — Date Stamped
[signature] — Donald J Allen (ELGAS) — 29-1-05

05-026

I certify that the details in this application (including any accompanying computer disk) are correct and cover all licensable quantities of dangerous goods kept on the premises.

13 Signature of Applicant — Printed Name
[signature] — Michael Trevor James.

Please send your application marked Confidential, to: **Dangerous Goods Licensing,**
WorkCover NSW, Locked Bag 2906, LISAROW NSW 2252
Hotline: (02) 4321 5500 - Fax: (02) 9287 5500



This drawing and the copyright therein are the property of ELGAS and all information which it contains is confidential. The drawing must not be reproduced or disclosed, nor must any information taken therefrom be disclosed without the prior consent of ELGAS.

Customer's name & address
ROSSFREIGHT P/L
74-78 SEVILLE ST.
VILLAWOOD

Scale 1:200 ~~N.T.S~~ | Date 6-1-05 | Drawn by S.RAMJAS

Drawing Title
SITE TO RELOCATE LPG TANK

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 metres

ELGAS Ltd
ACN 002 749 260
10-18 Cliff Street, Milsons Point NSW 2061
Tel: (02) 957 3422 Fax: (02) 925 0454

What is a depot? See page 5 of the Guidance Notes

PART C - Dangerous Goods Storage Complete one section per depot

If you have more depots than that space provided, photocopy sufficient sheets first

Depot Number	Type of Depot (see page 5)	Depot Class	Maximum Storage Capacity
4	Above ground Decanting Tank	2.1	4500 L

UN Number	Proper Shipping Name	Class	PG (I, II, III)	Product or Common Name	Typical Quantity	Unit eg L, kg, m^3
1075	Liquified Petroleum Gas	2.1	—	LP Gas	4500	L

Licence No. 35/034956

RECEIVED
SERVICE CENTRE
16 APR 2003
WORKCOVER
NEW SOUTH WALES

APPLICATION FOR RENEWAL
OF LICENCE TO KEEP DANGEROUS GOODS

ISSUED UNDER AND SUBJECT TO THE PROVISIONS OF THE DANGEROUS GOODS ACT, 1975 AND REGULATION THEREUNDER

DECLARATION: Please renew licence number 35/034956 to 17/05/2004 . I confirm that all the licence details shown below are correct (amend if necessary).

..... Peter McFarlane 15-4-03

(Signature) *(Please print name)* *(Date signed)*

for: ROSS FREIGHT (AUST) PTY LIMITED

*THIS **SIGNED** DECLARATION SHOULD BE **RETURNED TO:***

WorkCover New South Wales
Dangerous Goods Licensing Section
LOCKED BAG 2906
LISAROW NSW 2252

Enquiries:ph (02) 43215500
fax (02) 92875500

Details of licence on 11 April 2003

Licence Number 35/034956 **Expiry Date** 17/05/2003

Licensee ROSS FREIGHT (AUST) PTY LIMITED ACN 003 775 648
ROSS FREIGHT (SYDNEY) PTY LTD

Postal Address: ROSS FREIGHT (SYDNEY) PTY LTD 74-78 SEVILLE ST VILLAWOOD NSW 2163

Licensee Contact ~~BRUCE SPARGO~~ Peter McFarlane Ph. 02 9794 7666 Fax. 02 9794 7688

Premises Licensed to Keep Dangerous Goods
ROSS FREIGHT (AUST) PTY LIMITED ROSS FREIGHT (SYDNEY) PTY LTD
74-78 SEVILLE ST VILLAWOOD 2163

Nature of Site ROAD FREIGHT TRANSPORT

Major Supplier of Dangerous Goods UNKNOWN OR OTHER

Emergency Contact for this Site BRUCE SPARGO Ph. 0413 878 946

Site staffing 22 HOURS 5 DAYS

Details of Depots

Depot No.	Depot Type	Goods Stored in Depot	Qty
1	**UNDERGROUND TANK**	**Class 3**	**10800 L**
	UN 1202 DIESEL FUEL		10800 L
2	**UNDERGROUND TANK**	**Class 3**	**10800 L**
	UN 1202 DIESEL FUEL		10800 L
3	**UNDERGROUND TANK**	**Class 3**	**15800 L**
	UN 1202 DIESEL FUEL		15800 L
4	**ABOVE-GROUND TANK**	**Class 2.1**	**4500 L**
	UN 1075 PETROLEUM GASES, LIQUEFIED		4500 L
5	**ROOFED STORE**	**Class 8**	**7500 L**
	UN 1789 HYDROCHLORIC ACID		7500 L

ATP

Application for Licence to Keep Dangerous Goods

WorkCover NEW SOUTH WALES

Application for ☐ new licence ☒ amendment ☐ transfer ☐ renewal of expired licence

PART A – Applicant and site information See page 2 of Guidance Notes.

1 Name of applicant (Aust) ACN

ROSS FREIGHT PTY LTD LIMITED 003 775 648

2 Postal address of applicant Suburb/Town Postcode

74-78 SEVILLE ST VILLAWOOD 2163

3 Trading name or site occupier's name

ROSS FREIGHT (SYDNEY) PTY LTD

4 Contact for licence inquiries

Phone Fax Name

9794 7666 9794 7688 BRUCE SPARGO

5 Previous licence number (if known) 35/ — 034956

6 Previous occupier (if known) —

7 Site to be licensed

No Street

74-78 SEVILLE ST.

Suburb / Town Postcode

VILLAWOOD 2163

RECEIVED SERVICE CENTRE 17 MAY 2001 WORKCOVER NEW SOUTH WALES

8 Main business of site ROAD FREIGHT

9 Site staffing: Hours per day 45 @ 22HRS Days per week 5

10 Site emergency contact

Phone Name

0413 878 946 BRUCE SPARGO

11 Major supplier of dangerous goods —

12 If a new site or for amendments to depots – see page 4 of Guidance Notes.

Plan stamped by: Name of Accredited Consultant Date stamped

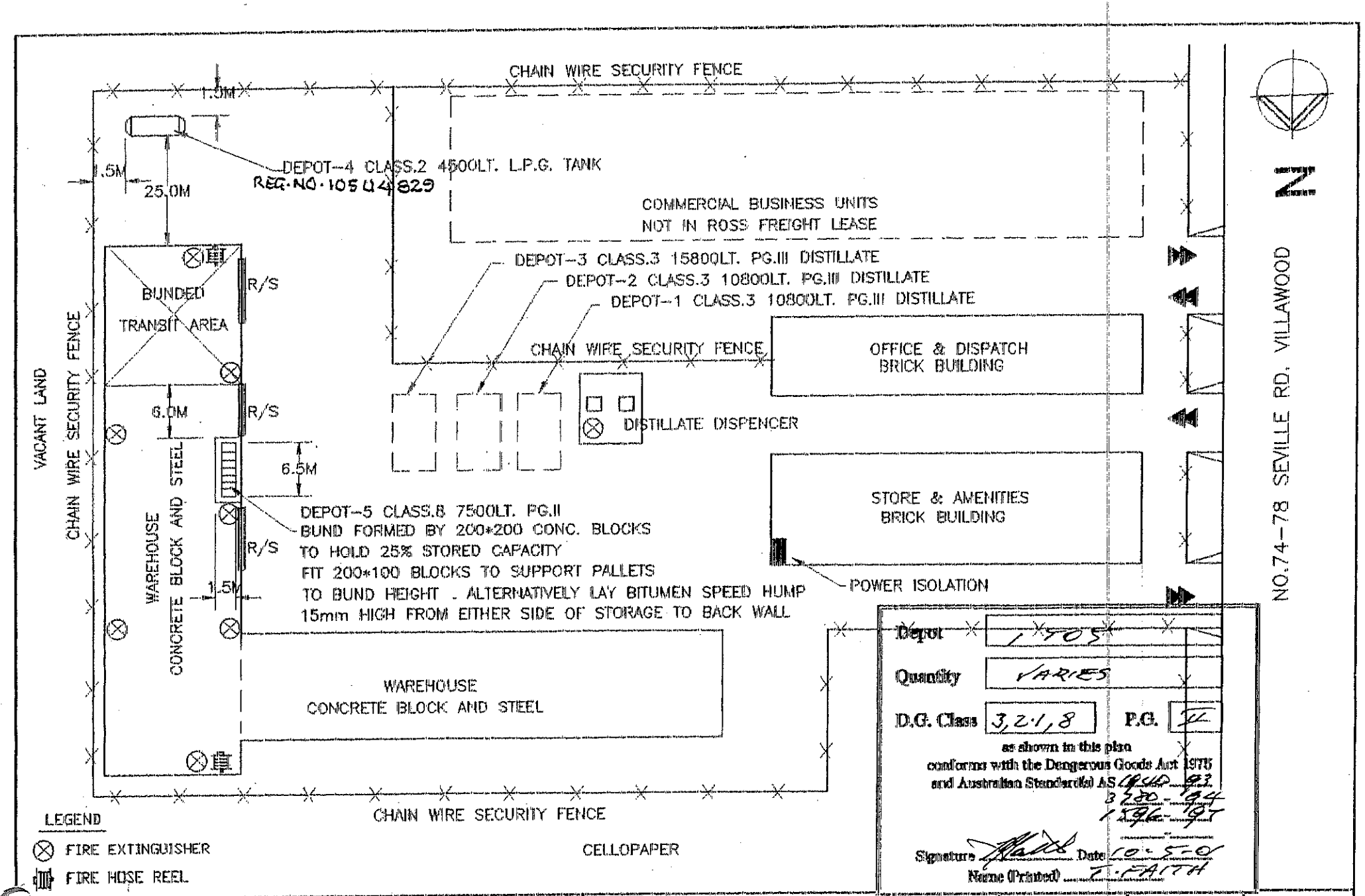
PHOENIX PROFESSIONAL SERVICES 10-5-01

I certify that the details in this application (including any accompanying computer disk) are correct and cover all licensable quantities of dangerous goods kept on the premises.

13 Signature of applicant Printed name Date

Bruce Spargo 14-5-01

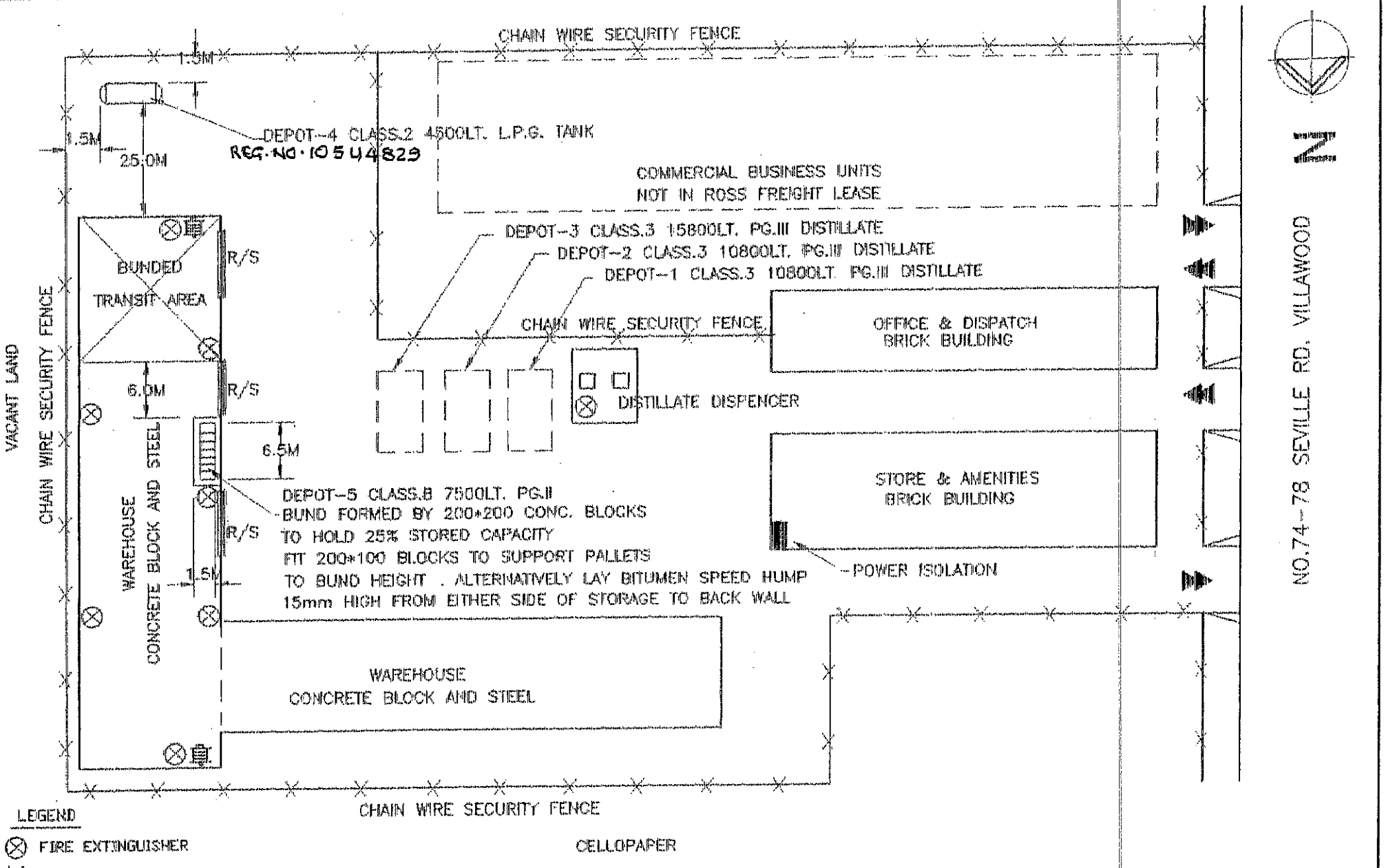
Please send your application, marked *CONFIDENTIAL*, to: **Dangerous Goods Licensing, WorkCover NSW, Level 3, GPO Box 5364, SYDNEY NSW 2001**



PLAN OF DANGEROUS GOODS DEPOTS
ROSS FREIGHT PTY.LTD.
74–78 SEVILLE ROAD VILLAWOOD 2163

PHOENIX PROFESSIONAL SERVICES
17 ALMERIA AVENUE BAULKHAM HILLS N.S.W. 2153
PHONE–FAX 02–9624 3992

SCALE	PASSED	DATE
NONE		10–5–01
DRAWN T.J.F	DRAWING NO. RF–100	



PLAN OF DANGEROUS GOODS DEPOTS
ROSS FREIGHT PTY.LTD.
74-78 SEVILLE ROAD VILLAWOOD 2163

PHOENIX PROFESSIONAL SERVICES
17 ALMERIA AVENUE BAULKHAM HILLS N.S.W. 2153
PHONE-FAX 02-9624 3992

SCALE	PASSED	DATE
NONE		10-5-01
DRAWN T.J.F	DRAWING NO. RF-100	

PART C Dangerous Goods Storage *Complete one section per depot.*

If you have more depots than the space provided, photocopy sufficient sheets first.

Depot Number	Type of depot	Depot Class	Maximum storage capacity
1	U/G TANK	3-C-1	10800 LT OK

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m³
1202	DIESEL FUEL OIL	3 C-1	III	DIESEL FUEL OIL	10800	LT

Depot Number	Type of depot	Depot Class	Maximum storage capacity
2	U/G TANK	3-C-1	10800 LT OK

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m³
1202	DIESEL FUEL OIL	3 C-1	III	DIESEL FUEL OIL	10,800	LT

Depot Number	Type of depot	Depot Class	Maximum storage capacity
3	U/G TANK	3-C-1	15,800 LT OK

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m³
1202	DIESEL FUEL OIL	3 C-1	III	DIESEL FUEL OIL	15,800	LT

Depot Number	Type of depot	Depot Class	Maximum storage capacity
4	A/G TANK HORIZ. TANK	2.1	4500 LT OK

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m³
1075	PETROLEUM GAS REG No. 105144829	2.1	—	L.P.G	4500	LT

PART C Dangerous Goods Storage *Complete one section per depot.*

If you have more depots than the space provided, photocopy sufficient sheets first.

Depot Number	Type of depot	Depot Class	Maximum storage capacity
5	ROOFED STORE (RACKED)	8	7500 LT

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m^3
1789	HYDROCHLORIC ACID	8	II	H.C.L.	7500	LT

Depot Number	Type of depot	Depot Class	Maximum storage capacity

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m^3

Depot Number	Type of depot	Depot Class	Maximum storage capacity

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m^3

Depot Number	Type of depot	Depot Class	Maximum storage capacity

UN Number	Correct Shipping Name	Class	PG (I, II, III)	Product or common name	Typical quantity	Unit, e.g. L, kg, m^3

ASIA PACIFIC OFFICES

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F: +61 7 3858 4801

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Canberra ACT 2600
Australia
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F: +61 2 9427 8200

DARWIN
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