

Clyde Terminal

Annual Environmental Performance Review

Reporting Period: 01 January to 31 December 2020

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Issue date: 30 July 2021

1 Introduction

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

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

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

The main objectives of the conversion project were:

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

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

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

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

The content of this Annual Review meets the requirements of SSD 5147 condition D4. Table 4 below lists the requirements and the corresponding sections where each specific requirement is addressed.

Table 1: Annual review reporting requirements

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

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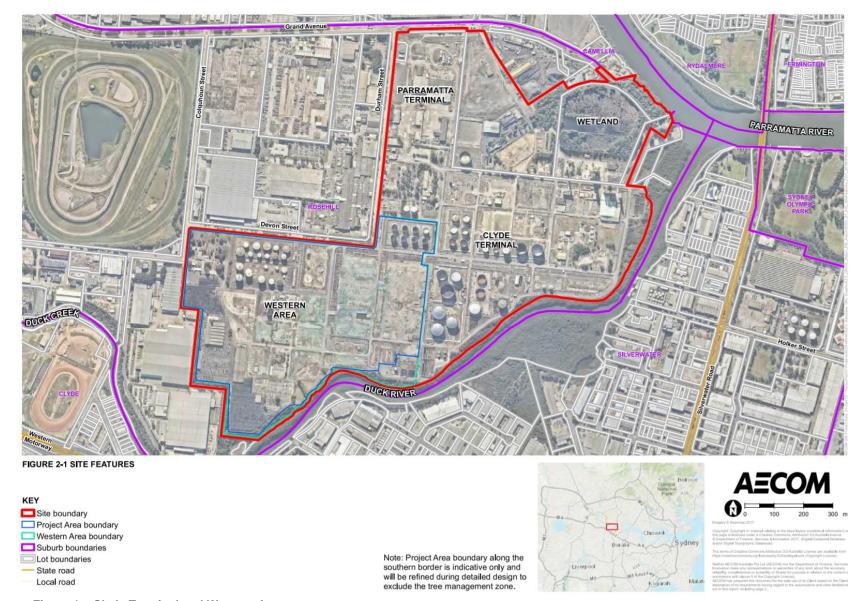


Figure 1 - Clyde Terminal and Western Area

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2 Approvals

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

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

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

- Environment Protection Licence (EPL) No. 570 under the Protection of Environment Operations Act 1997 (POEO Act).
- Major Hazards Facility (MHF) Licence under the Work Health and Safety Act 2011 (WH&S Act)

3 Development activities

This Section describes the works undertaken in accordance with Development Consent SSD 5147 during the reporting period (1 January to 31 December 2020).

3.1 Works undertaken during this reporting period

3.1.1 Demolition works

Demolition phases 2 and 3 as described on the Modification of Development Consent were started at the end of the last reporting period and executed during the first half of 2020. These works included the demolition of the following assets (refer to Figure 2):

- Tankfarms A2 and A3;
- Tankfarm C;
- State Office Building;
- MTS1 35kV switch yard;
- Tank T106;
- LPG spheres V137 and V140; and,
- LPG truck loading gantry

3.1.2 Construction works

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

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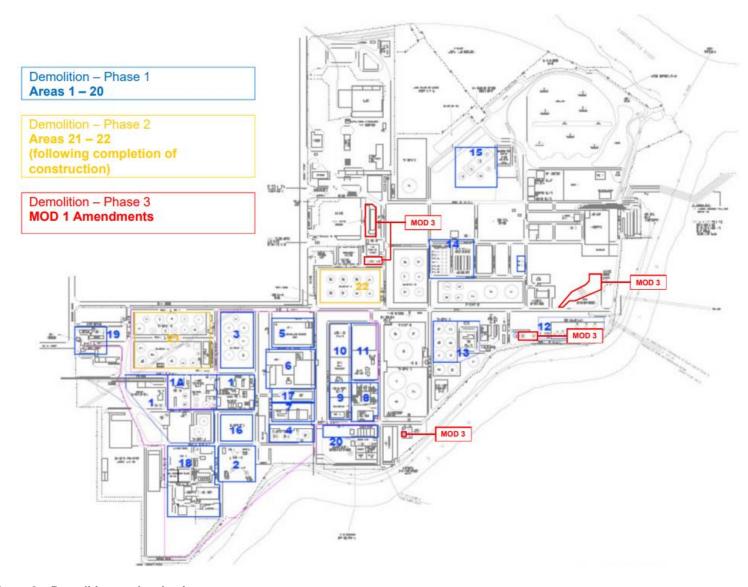


Figure 2 – Demolition works phasing

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3.1.3 Operations

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

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

The tank maintenance program included maintenance on floating covers and associated vapour sealing systems as part of scheduled off stream inspections to control VOC emissions for tank T84, gasoline storage.

Table 2: Operations summary

Product	Approved limit	Previous reporting period (actual)	This reporting period (actual)	Next reporting period (forecast)
Finished petroleum products (ML)	264	211	207	217
Petroleum gases (m³)	1,550	0	0	0

3.2 Proposed works for the next reporting period

3.2.1 Demolition works

All demolition works approved by SSD-5147 and SSD-5147 MOD 1 had been completed at the time of writing this report. Some material stockpiles associated with the demolition works remain and these will be characterised for reuse onsite or offsite disposal to a licenced landfill facility.

3.2.2 Construction works

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

There are not additional works proposed for next year.

3.2.3 Operations

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

4 Environmental performance

4.1 Noise

During the reporting period, noise at Clyde was managed in accordance with the Construction and Demolition Noise Management Plan. This plan meets the requirements of condition C25 of the SSD 5147.

Demolition works were undertaken within the approved hours under condition C22 of the SSD 5147. No noise complaints were received during this reporting period. Therefore, noise monitoring at the sensitive receivers was not triggered or required.

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

4.2 Air

During the reporting period, air emissions were managed in accordance with the Construction and Demolition Air Quality Management Plan. This plan meets the requirements of condition C31 of the SSD 5147. During the reporting period, visual observations were conducted weekly throughout various areas of demolition works. Low and controlled levels of dust were observed. No air quality complaints were received during this or previous reporting periods.

Operational air emissions were managed in accordance with the Environmental Management Manual (EMM) and monitored following the approved Operational Air Quality Monitoring Program under condition C30 of the SSD 5147. Monitoring results for the reporting period are detailed below:

4.2.1 Dust

Visual monitoring for dust was undertaken during routine site activities. Low and controlled levels of dust were observed.

4.2.2 Odour

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

An annual emission survey of odours as required in the Operational Air Quality Monitoring Program was undertaken during the reporting period by a suitably qualified and independent consultant on the 28 and 29 November 2020. A perimeter survey of the site was carried out during which the presence and, where possible, the character of odours was noted. Due to remediation works being undertaken on the Western Area of the site (refer to red boundary on Fig.1), the south west boundary of the site could be not be assessed. The odour survey was conducted on the weekend, thereby excluding potential odorous impacts associated with the western area remediation; the Bureau of Meteorology recorded temperatures at Sydney Olympic Park of over 41C on both days of the survey.

Odours were rated, from Not Perceptible to Distinct, based on the German standard Olfactometry Determination of Odour Intensity (VDI 3882 Part 1). Results of the boundary odour survey are depicted on Figure 3 below with odour intensity ranging from not perceptible to weak over a number of discrete locations along the site perimeter.

Of the odours identified along the site boundary, only two areas were associated with site activities; namely surface water interceptors near tank 90 and the biotreater and main interceptor area to the south of the site. Both locations had odour characters associated with an operating fuel terminal, including fuel, diesel, petrol and dirty. These odours were localised, ranged in intensity depending on proximity to the source and are considered unlikely to present an adverse odour impact on industrial receptors situated at the site boundary. On this basis, no additional mitigation measures were proposed in relation to managing odours at the site boundary.

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Table 3 CTCP Boundary Odour Survey - 28 November 2020

Boundary locations east of CT03: A weak industrial garbage odour was identified at the location of the former waste facility. Whilst the waste facility had been demolished, the odour's character was consistent with former waste facility which operated adjacent to the site. These odours were considered to have originated off site.

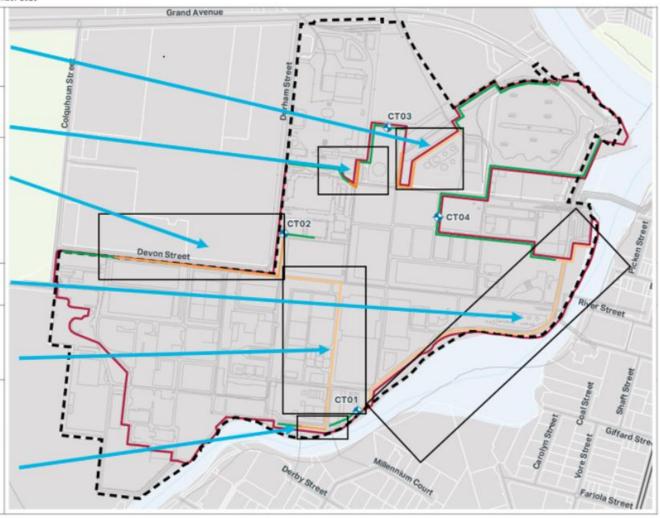
Surface water Interceptors: Localised weak odours were identified in this area had light, sharp, fuel characters and appeared to be immediately adjacent to the surface water interceptors.

Boundary locations on Devon Street: Odours identified along this boundary appeared to be associated with neighbouring industrial properties, as the odour characters included wet cardboard, and savoury. The odour's character and location would indicate that the odour was not originating from the Site.

Mangroves: Very weak mangrove and muddy odours were identified intermittently along the south east of the site. These odours are considered to have originated off site.

Boundary of the western area remediation. A very weak diesel and fuel odour was identified along the eastern boundary of the western area remediation (WAR). The source could not be identified and could be associated with typical plant operations are remedial activities.

Water treatment area: a localised light end petroleum hydrocarbon smell was identified near the biotreater and main interceptor traps, which are the likely sources. Although these locations are along the boundary, the odours are not likely to constitute an off-site adverse odour impact due to their confined extent and to the presence of the Duck River bordering the south side of the Site, therefore providing a buffer zone to surrounding industrial receptors.



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Table 4 CTCP Boundary Odour Survey - 25 November 2020

Surface water Interceptors: Localised weak to distinct odours were identified in this area had sharp, fuel and solvent characters and appeared to be immediately adjacent to the surface water interceptors. The odours appeared further to the north compared with the survey taken on the previous day.

Boundary locations near CT04: A localised dirty, diesel odour was identified near CT04. The source of the odour was not able to be identified.

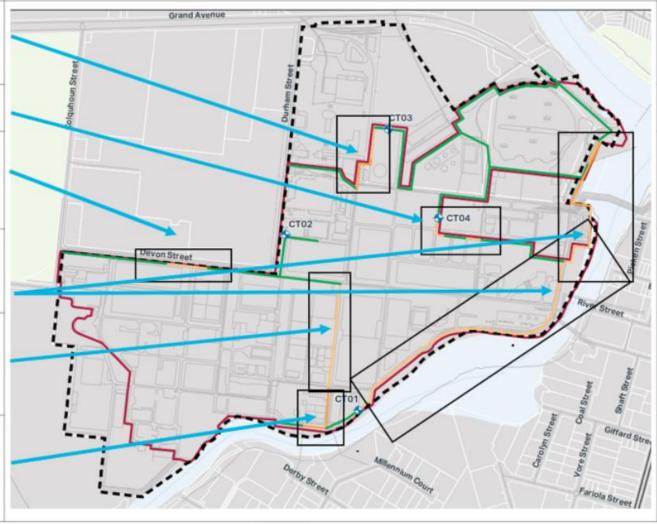
Boundary locations on Devon Street: Very weak odours identified along this boundary appeared to be associated with neighbouring industrial properties, as the odour character was identified as savoury. The odour's character and location indicated that the odour was not originating from the Site.

Mangroves: Very weak mangrove odours were identified intermittently along the south east of the site. These odours are considered to have originated off site.

Boundary of the western area remediation.

Very weak soil and dirty, diesel odours were identified along the eastern boundary of the western area remediation (WAR). The source could not be identified and could be associated with typical plant operations are remedial activities. It is noted that the odour character had a more pronounced smell of soil / earth compared with the odour survey on the previous day.

Water treatment area: As per the previous event, a localised fuel odour was identified near the biotreater and main interceptor traps, which are the likely sources. Additionally, a weak algae type odour was identified immediately to the north of the water treatment area. The odours are not likely to constitute an off-site adverse odour impact due to their confined extent and to the presence of the Duck River bordering the south side of the Site, therefore providing a buffer zone to surrounding industrial receptors.



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4.2.3 VOCs

Emissions from the storage tanks are estimated using the techniques in line with the National Pollutant Inventory (NPI) reporting process and submitted to both NPI and Annual Return required under EPL 570 for the period 02 July to 01 July. The assessment of annual air emissions for 2019/2020 was calculated to be 262kg of Benzene and 52,213kg of Volatile Organic Compounds (VOC's) discharged to air, well below the EPL load limits of 26,000kg and 1,250,000kg, respectively. The 2020/2021 annual emissions will be calculated and reported to the NSW EPA by 30 August 2021.

The annual emission survey described in the above section also included VOCs sampling and analysis. Four boundary locations were surveyed based on likely peak impact areas identified in the EIS and variability in wind conditions, as depicted on Figure 4 below. Boundary ambient air sampling was conducted at each location using stainless steel evacuated canisters and flow controllers. Samples were collected over a period of over 22 hours and canisters were subsequently analysed for CoPC following method US EPA TO-15.

Monitoring results are summarised below in Table 3 below with details presented on the Annual Air Quality Monitoring Survey report (Aecom, 2021). Measured concentrations for benzene and total VOCs were found to be consistent with levels predicted in the AQIA (AECOM, 2013). Results for all samples were below limit of reporting (LOR) for all CoPCs. When comparing to the assessment criteria adopted in the EIS, all measured VOCs resulted in levels well below the applicable criteria.

Table 3: Maximum 1-hour VOC Concentration (99.9th percentile)

Pollutant	Assessment cri	Monitoring results	
	NSW EPA criteria ¹	EIS prediction ²	Measured value
Benzene (μg/m³)	29	0.35 – 0.60	<3
VOC, total (μg/m³)	-	80 - 180	<100

-

¹ NSW EPA Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (DEC, 2005)

² Excludes background concentration

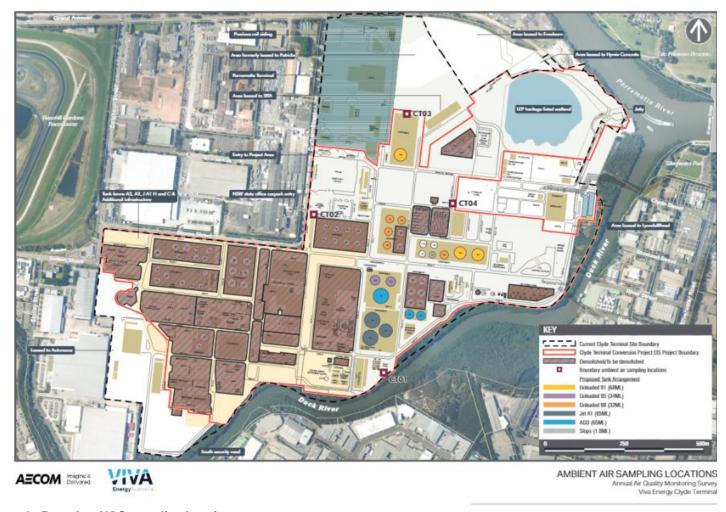


Figure 4: Boundary VOC sampling locations

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4.3 Soil and water

Demolition soil and water environmental aspects were managed in accordance with the Soil and Water Management Plan. This plan meets the requirements of conditions C17, C20, C24 and C50 of the SSD 5147. During the reporting period, visual observations were conducted to ensure sediment-laden water was properly managed and not discharged off-site. No groundwater or excavated soil testing was required during the reporting period.

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

Monitoring of surface water discharge was conducted in accordance with the EPL requirements (refer to Appendix A.2). The biotreater effluent is the main discharge point, identified as EPA ID No.1 (Refer to Figure 4). This point was monitored monthly during the reporting period with pollutant concentrations well below the EPL limits as detailed in summary Table 4 below. Results are comparable to those presented in the previous reporting period. The average daily discharge flow at this point was 1,187 kL/day, with a maximum daily discharge volume recorded of 1,942 kL. The EPL volume limit at this discharge point is 4,000 kL/day. Water was not discharged from the other approved discharge points (EPL ID No. 2, 4 or 30).

Table 4: Summary of monitoring results for the main discharge point at Clyde Terminal (EP ID No.1)

Pollutant	Co	Monitoring results				
	50 percentile	90 percentile	100 percentile	min	ave	max
BOD (mg/L)	45	95	n/a	<5	<5	6
Fluoride (mg/L)	25	40	n/a	0.24	0.95	2.3
Nitrogen (Ammonia)	6	30	n/a	0.01	0.08	0.3
Oil and Grease (mg/L)	8	10	n/a	<5	<5	<5
ph			6.0-9.0	6.4	7.2	7.9
Phenols (mg/L)			0.5	<0.05	<0.05	<0.05
Total Nitrogen (mg/L)	35	100	n/a	0.6	5.01	13
Total Phosphorus (mg/L)	1.5	6	n/a	0.11	0.31	0.76
TSS (mg/L)	30	60	n/a	<5	<5	8

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

Overflow events were recorded for the East Interceptors Bays during February 2020 due to heavy rainfall.

Samples were taken daily during overflow conditions for the East Interceptors. Summary results for the overflow discharge at the East Interceptors are presented in Table 5 below.

Table 5: Summary of monitoring results for overflow discharge to water (EP ID No.28 and 29)

Pollutant	Concentration limits	Monitoring results						
	No concentration limits	EPA ID No.28		EPA ID No.29				
		min	ave	max	min	ave	max	
рН	n/a	7.6	7.6	7.7	7.3	7.4	7.6	
Total Organic Carbon (mg/L)	n/a	1.3	1.9	2.7	2.9	5.0	6.7	
Total Suspended Solids (mg/L)	n/a	<5	4.8	6	9	42	110	

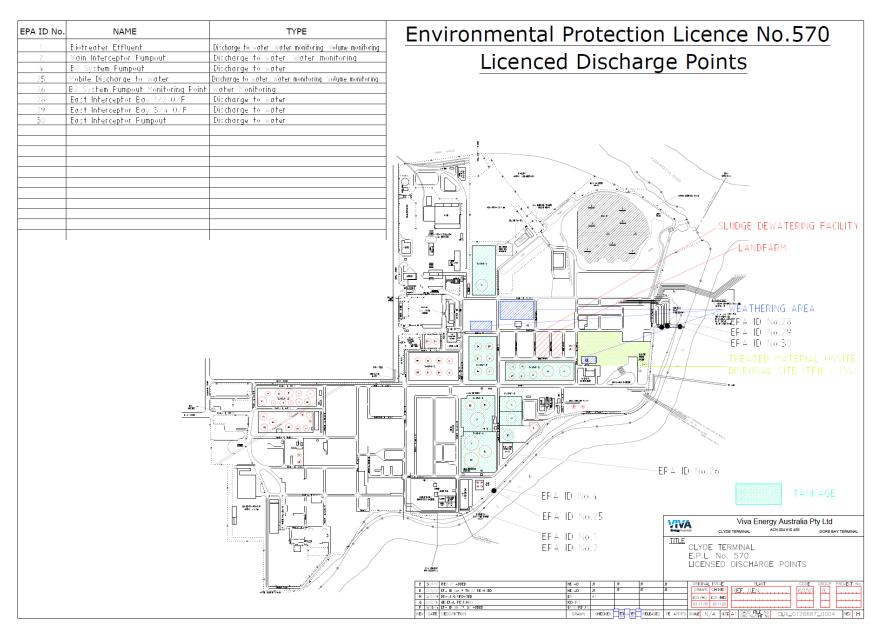


Figure 5 - Clyde Terminal licensed discharge points

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4.4 Biodiversity

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

During the last reporting period, the proposed wetland mosaic and dispersal corridor were constructed. Also, a frogproof fence was installed along the wetland mosaic and main wetland to help contain the Green and Golden Bell Frog within their improved habitat and exclude them from operational areas.

Wetland maintenance activities have continued throughout the reporting period.

4.5 Waste

Demolition wastes were managed in accordance with the Waste and Resource Recovery Management Plan. This plan meets the requirements of condition C57 of the SSD 5147. The EMM lists the relevant waste management measures for Operations.

During the reporting period, construction and operation activities at Clyde Terminal generated approximately 1,044.5 tonnes of solid and liquid wastes, which was a slight decrease from the previous year's result of 1,251.81 tonnes. Approximately, 74% of this waste was subject to chemical or physical treatment prior disposal, 2% was recycled and 24% was sent off to landfill.

No asbestos were generated during the reporting period.

5 Incidents and non-compliances during the reporting period

No reportable incidents occurred during the reporting period.

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

6 Actions required from previous Annual Review

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

During the reporting period, the following improvement measures were implemented:

- Further consolidation of the terminal operations with the demolition of the Western tankfarm area, resulting in reduced energy consumption;
- Drainage cleaning in the surplus western area of the site to decommission the redundant subgrade drainage system and reduce environmental risks for further land use; and,
- Remediation works of a portion of the surplus western area in accordance with a separate development consent (SSD 9302). The environmental performance of these works will be reported separately.

7 Measures to improve the environmental performance

During the reporting period there has been a focus on the removal and disposal of sludge from the Wastewater Treatment Plant to ensure its continued effectiveness. Sludge has been removed from Main Interceptor Bays 1 and 2, and the Biotreater Buffer Basin.

Appendix A

- A.1 Annual Environmental Performance Review (1 January to 31 December 2019) approval email
- A.2 Surface water discharge monitoring results

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A.1 Annual Environmental Performance Review (1 January to 31 December 2019) approval email

Salazar Zarate, Erica S

From: no-reply@majorprojects.planning.nsw.gov.au

Sent: Thursday, 8 October 2020 5:50 PM

To: Salazar Zarate, Erica S

Cc: Hala.Fua@planning.nsw.gov.au; Salazar Zarate, Erica S
Subject: Clyde Refinery Conversion - Revised 2019 Annual Review

<EXTERNAL EMAIL>

This email is to acknowledge receipt of the Revised 2019 Annual Review for the Clyde Refinery Conversion .

The Department has no comments on the document at this time.

If you have any exquiries, please contact Hala Fua on 8837 6328 /at Hala.Fua@planning.nsw.gov.au.

To sign in to your account click here or visit the Major Projects Website.

Please do not reply to this email.

Kind regards

Department of Planning, Industry and Environment



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A.2 Surface water discharge monitoring results

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Pollutant	Biochemical Oxygen Demand (BOD)	Fluoride	Nitrogen (Ammonia)	Oil and Grease	рН	Phenols	Total Nitrogen	Total Petroleum Hydrocarbons		arbons	Total Phosphorus	Total Suspended Solids	
Licence Limit	45/95 (50%/90%)	25/40 (50%/90%)	6/30 (50%/90%)	8/10 (50%/90%)	6-9	0.5	35/100 (50%/90%)	C6-C9	C10-C14	C15-C28	C29-C36	1.5/6 (50%/90%)	30/60 (50%/90%)
Units of Measure	mg/L	mg/L	mg/L	mg/L	units	mg/L	mg/L	ug/L			mg/L	mg/L	
Freq. as per EPL	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly	Monthly			Monthly	Monthly	
02/01/2020	<5	1.7	0.07	<5	7	<0.05	7	<0.2	<0.05	<0.2	<0.2	0.23	<5
02/02/2020	<5	0.36	0.1	<5	7.1	<0.05	0.89	<0.2	< 0.05	<0.2	<0.2	0.13	<5
05/03/2020	<5	0.85	0.02	<5	7.3	< 0.05	0.6	<0.2	< 0.05	<0.2	<0.2	0.12	<5
02/04/2020	<5	0.24	0.01	<5	7.7	<0.05	2	<0.2	< 0.05	<0.2	<0.2	0.11	<5
07/05/2020	<5	1.8	0.3	<5	7.4	<0.05	6.9	<0.2	< 0.05	<0.2	<0.2	0.19	<5
04/06/2020	<5	0.32	0.07	<5	7.9	<0.05	6	<0.2	<0.05	<0.2	<0.2	0.11	<5
02/07/2020	<5	0.47	0.08	<5	6.5	<0.05	13	<0.04	<0.05	<0.2	<0.2	0.11	<5
06/08/2020	<5	0.63	0.02	<5	7.6	<0.05	3.4	<0.2	<0.05	<0.2	<0.2	0.47	8
03/09/2020	<5	1	0.03	<5	6.4	<0.05	0.73	<0.2	<0.05	<0.2	<0.2	0.11	6
01/10/2020	6	0.9	0.12	<5	6.9	<0.05	12	<0.2	<0.05	<0.2	<0.2	0.67	<5
05/11/2020	<5	0.79	0.06	<5	7.5	< 0.05	2	<0.2	<0.05	<0.2	<0.2	0.67	<5
03/12/2020	<5	2.3	0.06	<5	7	< 0.05	5.6	<0.2	< 0.05	<0.2	<0.2	0.76	<5

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EPA ID No.2 – Main Interce	EPA ID No.2 – Main Interceptor Pumpout									
Pollutant	рН	PhenoIs	Total Organic Carbon	Total Suspended Solids						
Licence Limit	6.0-9.0	0.5	100	50						
Units of Measure	units	mg/L	mg/L	mg/L						
Frequency as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging						
January 2020			No discharge							
February 2020			No discharge							
March 2020			No discharge							
April 2020			No discharge							
May 2020			No discharge							
June 2020			No discharge							
July 2020			No discharge							
August 2020			No discharge							
September 2020			No discharge							
October 2020	No discharge									
November 2020	No discharge									
December 2020			No discharge							

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EPA ID No. 4 - B2 System Pump out										
Pollutant	рН	Phenols	Total Organic Carbon	Total Suspended Solids	Total Petroleum Hydrocarbons					
Licence Limit	6.0-9.0	0.5	100	50	n/a					
Units of Measure	units	mg/L	mg/L	mg/L	μg/L					
Frequency as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging					
January 2020				No discharge						
February 2020				No discharge						
March 2020				No discharge						
April 2020				No discharge						
May 2020				No discharge						
June 2020				No discharge						
July 2020				No discharge						
August 2020				No discharge						
September 2020				No discharge						
October 2020				No discharge						
November 2020		No discharge								
December 2020				No discharge						

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EPA ID No.25 – Flexible discharge outlet									
Pollutant	рН	Total Organic Carbon	Total Suspended Solids						
Licence Limit	6.0-9.0	100	50						
Units of Measure	units	mg/L	mg/L						
Frequency as per EPL	<5 days prior to discharge	<5 days prior to discharge	<5 days prior to discharge						
January 2020		No discharge							
February 2020		No discharge							
March 2020		No discharge							
April 2020		No discharge							
May 2020		No discharge							
June 2020		No discharge							
July 2020		No discharge							
August 2020		No discharge							
September 2020		No discharge							
October 2020	No discharge								
November 2020	No discharge								
December 2020		No discharge							

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EPA ID No. 26 - B2 System Monitoring Point										
Pollutant	рН	Phenols	Total Organic Carbon	Total Suspended Solids	Total Petroleum Hydrocarbons					
					C6-C9	C10-C14	C15-C28	C29-C36		
Units of Measure	рН	mg/L	mg/L	mg/L			ug/L			
Freq. as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging		Daily w	hen discharging			
January 2020				No discharge						
February 2020				No discharge						
March 2020				No discharge						
April 2020				No discharge						
May 2020		No discharge								
June 2020		No discharge								
July 2019	No discharge									
August 2020				No discharge						
September 2020		No discharge								
October 2020				No discharge						
November 2020				No discharge						
December 2020				No discharge						

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EPA ID No. 28 – East Interceptor Bay 1&2 overflow										
Pollutant	рН	Total Organic Carbon	Total Suspended Solids							
Licence Limit	n/a	n/a	n/a							
Units of Measure	units	mg/L	mg/L							
Frequency	Each overflow event	Each overflow event	Each overflow event							
January 2020		No discharge								
07/02/2020	7.6	2.7	6							
08/02/2020	7.6	1.6	<5							
09/02/2020	7.7	1.3	6							
March 2020		No discharge								
April 2020		No discharge								
May 2020		No discharge								
June 2020		No discharge								
July 2020		No discharge								
August 2020		No discharge								
September 2020		No discharge								
October 2020		No discharge								
November 2020		No discharge								
December 2020		No discharge								

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EPA ID No. 29 – East Interceptor Bay 3&4 overflow						
Pollutant	рН	Total Organic Carbon	Total Suspended Solids			
Licence Limit	n/a	n/a	n/a			
Units of Measure	units	mg/L	mg/L			
Frequency as per EPL	Each overflow event	Each overflow event	Each overflow event			
January 2020	No discharge					
07/02/2020	7.6	6.6	30			
08/02/2020	7.5	6.7	9			
09/02/2020	7.3	3.6	110			
10/02/2020	7.3	2.9	20			
March 2020	No discharge					
April 2020	No discharge					
May 2020	No discharge					
June 2020	No discharge					
July 2020	No discharge					
August 2020	No discharge					
September 2020	No discharge					
October 2020	No discharge					
November 2020	No discharge					
December 2020	No discharge					

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EPA ID No.30 – East Interceptor Pump-out						
Pollutant	рН	Oil and Grease	Total Organic Carbon	Total Suspended Solids		
Licence Limit	6.0-9.0	10	100	50		
Units of Measure	units	mg/L	mg/L	mg/L		
Frequency as per EPL	Daily when discharging	Daily when discharging	Daily when discharging	Daily when discharging		
January 2020	No discharge					
February 2020			No discharge	No discharge		
March 2020			No discharge			
April 2020			No discharge			
May 2020			No discharge			
June 2020			No discharge			
July 2020			No discharge			
August 2020			No discharge			
September 2020			No discharge			
October 2020			No discharge			
November 2020			No discharge			
December 2020			No discharge			

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