



Ann Hagerty
Senior Compliance Officer
Department of Planning and Environment
PO Box 1226
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30 March 2022

RE: Hexham Train Support Facility MP07_0171 Mod 1 (SSI-6090) 2021 Independent Environmental Audit DPI&E Request for Information Aurizon Response

Ann,

Please find attached the Aurizon Operations (**Aurizon**) Hexham Train Support Facility MP07_0171 MOD 1 (SSI-6090) 2021 Independent Environmental Audit, Version 2.0 (**the Audit**). The Audit has been completed to:

- Comply with MP07_0171 Mod 1 (**the Approval**) Condition D5.
- Updated to address requests detailed in the Hexham Train Facility (SSI-6090) 2021 Independent Environmental Audit – Request for Additional Information (DPI&E, 14/03/22) (**the RFI**).

The Audit was prepared, undertaken, updated and finalised in accordance with the DPI&E Independent Audit Post Approval Requirements (2020) by SLR Consulting Australia Pty Ltd.

If you have any queries regarding the audit, Aurizon's response to the Auditor's recommendations as provided in **Attachment 1** or SLR's updates to the RFI as provided in **Attachment 2** please feel free to contact me on the details provided below.

Kind regards,

A handwritten signature in blue ink that reads "Harry Egan".

Aurizon
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Attachment 1 – Response to Auditor Recommendations

Attachment 2 – SLR and Aurizon Response to DPI&E RFI

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ATTACHMENT 1 – Response to Auditor Recommendations



Rec #	Aspect	Recommendation	Aurizon Response	Timing
Non-Compliance Recommendation				
NC REC 1	Surface Water and Groundwater Monitoring Program	The Surface Water and Groundwater Monitoring Program should be updated to include reference to cumulative impacts and their management as required by Condition C19(h). If cumulative impacts are no longer required to be monitored following the completion of construction the Plan should clarify and justify.	<p>The intent of this condition is to monitor cumulative impacts to surface and groundwater during the period of the TSF and ARTC Relief Roads concurrent construction (2013/14).</p> <p>As construction of both projects has finalised Aurizon's position is that determining cumulative impacts is no longer required. Aurizon supports the auditors finding that this position needs to be clarified and justified in the management plan documentation.</p> <p>Proposed Actions: Update the Surface and Groundwater Monitoring Program to justify why cumulative impacts are no longer considered as part of next scheduled annual update.</p>	Prior to October 2022
NC REC 2	Document Submission	Establish (or review) system to ensure required submissions to regulatory authorities are completed by the relevant due dates.	<p>Aurizon supports the Auditor's finding.</p> <p>Proposed Actions: Aurizon will review the Compliance Tracking Program to ensure submission dates are accurately captured and adhered to.</p>	Prior to October 2022
NC REC 3	Soil and Water Management Plan – Contingency Plan	Update appropriate contingency plan sections of management plans to include major spill events.	<p>Aurizon supports the Auditor's finding.</p> <p>Proposed Actions: This recommendation stems from a non-compliance with Condition E63(d) of the Approval and relates to the Construction Soil and Water Management Plan (CSWMP) and Construction Environmental Management Plan (CEMP).</p> <p>As these two plans apply only to the now completed construction phase of the Turning Angle project they are no longer utilised. As such, the</p>	<p>CSWMP and CEMP - As part of any future approval.</p> <p>SERP - Prior to October 2022</p>

Rec #	Aspect	Recommendation	Aurizon Response	Timing
			plans will be updated with the Auditor's recommendation as required by any future project approval.	
			Update of the Site Emergency Response Plan (SERP) will be undertaken in line with the auditors finding as it is a currently utilised document.	
			Proposed Action: Update the SERP and referenced management plans in line with Auditor's recommendation.	
			Aurizon supports the Auditor's finding.	
NC REC 4	Construction Indigenous Heritage Management Plan	Clarify procedure for determining when works can recommence, and assessment of the consistency of any new Aboriginal heritage impacts against the approved impacts of the SSI, and registering of any new site(s) in the AHIMS database.	Proposed Action: As this plan apply only to the now completed construction phase of the Turning Angle project it is no longer utilised. As such, the plan will be updated with the Auditors recommendation as required by any future project approval.	As part of any future approval.
NC REC 5	Noise and Vibration Compliance Assessment	The noise and vibration compliance assessment should be updated to include consideration of all requirements of condition F4.	Aurizon supports the Auditor's finding and notes that this has been closed out as per SSI-6090-PA-34 on the 25 January 2022.	Closed
Improvement Recommendations				
			Aurizon does not support this recommendation.	
IMP 1	Inductions	It is recommended that inductions be updated to include specific reference to this development consent and environmental relevant legislation.	Inductions must be tailored documents that effectively communicate risk in a concise fashion. Specific reference to development consents and environmental relevant legislation will not provide beneficial outcomes and will detract from the key environmental management messaging contained within the induction. Aurizon maintains a site EMS which is administered by Aurizon's Senior Adviser Environment (NSW). An understanding of relevant environmental legislation and Approval particulars is adequately maintained at this and site management level as demonstrated by this audit.	Nil

Rec #	Aspect	Recommendation	Aurizon Response	Timing
			Proposed Action: Nil.	
			Aurizon does not support the Auditor's recommendation.	
IMP 2	Inductions	It is recommended that the visitor induction include environmental management to make visitors aware of their obligations.	While the intent of the Auditor's recommendation for an improvement to environmental management awareness is noted Aurizon focuses its visitor induction on safety as all visitors are escorted by Aurizon personnel and are not permitted to undertake any works onsite.	Nil
			Proposed Action: Nil.	
			Aurizon supports the Auditor's recommendation.	
IMP 3	ER approval of management plans	It is recommended that ER approval of management plans include reference to the version approved.	Proposed Action: As the recommendation only applies to project specific construction periods Aurizon will implement the recommendation as required by any future project approval.	As part of any future approval.
			Aurizon supports the Auditor's recommendation.	
IMP 4	Hydrocarbon management	Ensure empty drums are stored in appropriately bunded areas.	Proposed Action: Aurizon will address the handling and storage of empty drums at a future pre-start toolbox talk	Prior to October 2022
		Review management plans to ensure:		
		- A reference table referring to consent conditions is included;		
		- Where conditions are not addressed, include justification as to why;		
		- Cross references in management plans are correct;	Aurizon supports the Auditor's recommendation.	
IMP 5	Management Plans	- All Appendixes are attached to management plans published on the website;	Proposed Action: Aurizon will undertake a general review of the management plan documentation as part of the next scheduled annual review.	Prior to October 2022
		- Full names of acronyms used in the report are included;		
		- Other management plans are correctly referenced within the document;		
		- A full reference list is included in every Management Plan; and		

Rec #	Aspect	Recommendation	Aurizon Response	Timing
		- Document control including version and date is consistent throughout.		
IMP 6	Waste management	Some areas of legacy waste were identified at the site which are recommended for removal.	<p>Aurizon supports the Auditor's recommendation.</p> <p>Proposed Action: Aurizon will undertake a review of historical waste onsite and develop and reasonable and feasible management plan to dispose of identified waste.</p>	Prior to October 2022



ATTACHMENT 2 – SLR Response to DPI&E RFI

RFI #	RFI Detail	Updated IEA Sections and Aurizon Response
1	Section 4.2.3.7 - an assessment of the compliance between actual and predicted impacts documented in environmental impact assessment, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the <i>Environmental Planning and Assessment Act 1979</i> .	Section 3.6 for the comparison against the Turning Angle EA predicted impacts
2	Section 4.3.2.15 - key strengths of the development's environmental management and performance identified by the auditor.	Section 3.10 for the strengths of the development
3	<p>The department also noted that the following documents are not currently available on the SSI website:</p> <ul style="list-style-type: none"> Compliance Monitoring and Reporting Program (dated 19/12/2019) Independent Environmental Audit 2018 and Aurizon's Response to Audit Recommendations. 	<p>As per discussions between DPI&E and Aurizon the Compliance Monitoring and Reporting Program (CTP) is a live compliance tracking document and is uploaded annually to the project website as part of the annual Operational Compliance Report. Based on these discussions it is Aurizon's understanding that the DPI&E are satisfied with this approach to making the CTP publicly available.</p> <p>The Independent Environmental Audit 2018 and Aurizon's Response to Audit Recommendations was uploaded to the project website on the 23/03/22. The website address has been provided below.</p> <p>https://www.aurizon.com.au/what-we-deliver/projects/hexham-turning-angle</p>