

Adelaide and Parafield Airport Tenant Environmental Management Plan Guidelines

July 2009



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Abbreviations

AAL	Adelaide Airport Limited
ACC	Airport Coordination Centre
AES	Adelaide Airport Environment Strategy 2004
DOI	Department of Infrastructure, Transport, Regional Development and Local Government (Commonwealth)
EMP	Environmental Management Plan
VOC	Volatile Organic Compounds

1. Introduction

a. What is an Environmental Management Plan (EMP)?

- A management tool for the environment
- A structured planning approach
- Implements environmental measures

b. Why is an EMP required?

- A tenant requirement under the Adelaide Airport Environment Strategy 2004 and under commercial lease agreements with individual tenants
- Aligns tenant environmental management with the commitments set in AAL's Sustainability Policy
- A proven tool to improve manage environmental issues and improve performance of daily operations

c. What are the benefits of having an EMP?

- Integrates environmental management into the daily operations of a company
- Compliments existing company quality assurance and OH&S management systems
- Can reduce operational costs while increasing operational efficiency

d. How do you develop an EMP?

- Either utilise this document and follow the format provided; or
- Commission an environmental consultant to develop an EMP for you to implement

e. What should my EMP consist of?

- Your company's Environment Policy or Sustainability Policy
- A description of your company's operations
- The identification of environmental impacts caused by your operations
- Operational procedures (to reduce the risk of environmental impacts occurring)
- Staff training
- Documentation, review and audits

To develop your company EMP, follow the steps above, as detailed in Sections 3 to 8 in this document. It is suggested that all the documentation for the EMP be kept together in a separate file.



2. AAL Sustainability Policy

SUSTAINABILITY POLICY



Adelaide Airport Limited (AAL) is committed to managing and developing Adelaide and Parafield Airports in a sustainable manner. Our philosophy is to operate and develop our airports in accordance with the principles of sustainable development, recognising that the success of our organisation can be enhanced by conducting business in a way that is environmentally, socially and economically responsible. We believe that in choosing this path we can improve outcomes for our business, our stakeholders and the wider community for generations to come.

PHIL BAKER
Managing Director
September 2008

AAL's objectives are to:

minimise the environmental impact of our organisations' operations through a program of continuous improvement;

ensure that we provide a positive and safe working environment, where individuals are valued and equipped with the skills to effectively carry out their work;

Integrate the principles of sustainable development, economic viability and operational efficiency into decision making at all levels and communicate these to our stakeholders;

foster a culture of sustainability through our relationship with customers, partners, tenants, contractors and suppliers;

engage with the local community in a positive and constructive manner and be a valued member of the community;

ensure compliance with all relevant regulatory and other requirements; and

rigorously monitor our progress against meaningful objectives and targets.

www.aal.com.au



3. Company Environment Policy

An Environment Policy is:

- A statement of what a company intends to achieve from an environmental management plan; and
- Ensures all activities and operations are conducted in a way that they are consistent with the company's objectives

Before developing an environmental policy first determine whether the company already has a policy or its equivalent, and use this if provided. Otherwise develop an environmental policy in consultation with company senior management. However, the adoption of an environmental policy is not compulsory it is an optional extra and can also be named a sustainability policy.

To begin, consider the following questions:

- What does the term "environment" mean to your company?
- What are the most likely impacts on the environment resulting from the company's operations?
- How does the company want to be seen by the public?

An example environment policy is provided on the following pages.



Example Environment Policy – AirServices Australia



AIRSERVICES AUSTRALIA

Environment Policy

Airservices Australia is a provider of safe, environmentally friendly and efficient air traffic and related aviation services. Airservices Australia is committed to the objective of working towards environmental best practice globally. To achieve this we will:

- implement and maintain an Environment Management System which is aligned with the ISO 14001 Standard;
- comply with all relevant legislation and other requirements to which the organisation subscribes;
- identify activities which have a significant environmental impact;
- set environmental objectives and targets with priorities based on sound risk assessment;
- assign responsibilities and resources;
- document these activities, objectives and targets in an environmental management program;
- review objectives and targets every two years;
- reduce levels of pollution from current operations;
- establish energy efficiency strategies;
- avoid creating new pollution;
- develop environmental response plans where appropriate;
- monitor, review and continually improve performance;
- ensure suppliers use best environmental practice;
- communicate this policy to all employees;
- communicate this policy and information to identified interested parties; and
- provide the necessary environment, support and training.

All managers are accountable for environmental performance in their areas of responsibility.

A handwritten signature in black ink, appearing to read 'B R Smith'.

B R Smith
Chief Executive Officer

8 July 2004

Environment

Corporate Policy NO: C- POL: AA 000 6 Ver: 2

4. Company Operations

Describe the location, site and the operations undertaken by your company. Make a list of all permits and licences as well as the issuing authority, that are required for the company operations. This list can also be included as part of the audit checklist. For some, it may be useful to do this at the same time as developing the company Environment Policy.

Example 1

Fasta Carz is a car rental company with outlets Australia wide. The Adelaide Airport office is located on Sir Hubert Wilkins Road and has a staff of 10 people on site at any one time. The site consists of an office building, small maintenance workshop, a purpose built vehicle washbay and bitumen parking for the fleet vehicles.

The operations of Fasta Carz Car Rental Company at Adelaide Airport include the following:

- Storage of a fleet of up to 200 vehicles (mainly late model Volkswagon Kombis)
- Scheduled maintenance of vehicles
- Washing and detailing of vehicle fleet
- Refuelling of vehicles
- Transfers to and from customer pick up locations (eg. Terminal buildings)

Small amounts of chemicals (detergents and solvents) and oil is stored on the site in a Dangerous Goods Cabinet. Fasta Carz maintains a licence to store unleaded petrol. In addition to a Trade Waste Licence for the discharge of the vehicle washbay water to sewer.

Fasta Carz has introduced a new service, Combi Corporate, which is expected to be the market leader in corporate mid term leasing. Expansion of the Combi Corporate division is expected to grow ten fold in the next five years.

A Combi Corporate outlet has not been set up at Adelaide Airport, however there is the potential for a permanent location at Adelaide Airport given that similar operations are required for both Fasta Carz and Combi Corporate.

Example 2

Great Freight is an Australian freight forwarding and document express delivery company. The main operation of Great Freight at Adelaide Airport is a parcel distribution depot located at Export Park, Adelaide Airport. The Great Freight site at Adelaide Airport has limited capabilities of storing perishable goods waiting for export. The main operation at the airport is document and parcel express delivery to regional South Australia and Eastern Australia. There are approximately 25 delivery vehicles and vans attached to the operations at the airport, all of which are maintained off site. Another significant component of operations at the airport site is office and administrative support for all Great Freight offices in south eastern Australia.

5. Company Environmental Impacts

The important question to answer is how do the company's operations affect the environment?

For example, vehicle washing may be one component of your business that, if not managed correctly, can have significantly impact local waterways if wastewater is allowed down the drain and not released into the sewage system. Another impact of your company may be high energy usage which contributes to pollution from local power plants contributing to climate change. Lighting and refrigeration use higher amounts of energy if equipment is not maintained or updated to more efficient models.

Develop a table that includes:

- Your company activities
- Potential environmental impacts associated with each activity
- Give a rating to each activity
- Develop one or more strategies to manage or reduce the impact of each activity

The following example table rates each activity according to Table 1. Also refer to Appendix A (environmental risk ratings) for further information and guidance on the rating system

Example Activity Environmental Impacts Table

Activity	Potential Impacts	Rating	Management Strategy
Vehicle washing	<ul style="list-style-type: none"> • Soil contamination through inappropriate discharge • Water contamination through runoff • Natural resource depletion (i.e. potable water) 	2	<ul style="list-style-type: none"> • Appropriately designed and approved facilities • Water recycling plant • Safety controls and staff training • Correct storage of materials • Licensing/permits where appropriate • Prevent any washing water entering gutters and stormwater drains • System audits and checks
Waste storage and handling	<ul style="list-style-type: none"> • Water and soil contamination through litter • Loss to visual amenity 	3	<ul style="list-style-type: none"> • Reduce, reuse and recycle materials • Close bin lids when not in use • Sufficient bins provided • Regular waste removal through waste contract • System audits and checks
Administration office	<ul style="list-style-type: none"> • Electricity usage causing air pollution 	4	<ul style="list-style-type: none"> • Use energy efficient light bulbs • Turn lights and non essential air conditioning off when not in use • System audits and checks

Table 1 - Environmental risk ratings for activities of Airport Tenants

Activity	Reason for Activity to Potentially Cause Environmental Harm	Potential / Impacts	Overall Activity Rating	Possible Management Strategy
Washbays and washdown areas	<ul style="list-style-type: none"> Discharge of liquid waste into waterways Disposal of solid waste Consumption of energy 	<ul style="list-style-type: none"> Soil contamination through inappropriate discharge Water contamination through runoff Natural resource depletion (i.e. potable water) 	2	<ul style="list-style-type: none"> Appropriately designed and approved facilities Water recycling plant Low volume high pressure cleaners used Safety controls and staff training Correct storage of materials Licensing/permits where appropriate Discharge monitoring System audits and checks
Aircraft washing areas (tarmac and apron)	<ul style="list-style-type: none"> Discharge of contaminated runoff into waterways 	<ul style="list-style-type: none"> Surface water contamination 	2	<ul style="list-style-type: none"> Appropriately designed and approved facilities Safety controls and staff training Correct storage of materials Licensing/permits where appropriate Discharge monitoring System audits and checks
Underground storage tanks	<ul style="list-style-type: none"> Leaks and spills from stored chemicals Spills from movement/transfer of chemicals 	<ul style="list-style-type: none"> Soil and groundwater contamination through tank or delivery line leakage Soil and surface water contamination from runoff (at refuelling areas) 	2	<ul style="list-style-type: none"> Regular pressure/integrity testing of tanks Detailed records of volumes in and out retained with percentage variance in levels monitored Regular cathodic protection testing undertaken to check for corrosion if tank is steel Site register of all such facilities prepared All facilities to be in accordance with AS1940-2004 (The Storage and handling of flammable and combustible liquids) or to standards consistent with the requirements of the Dangerous Substances Regulations 2002 License under the Petroleum Products Regulations Act 1995 obtained from SafeWork SA where required Implement a program to remove/validate disused tanks
Chemical storage and handling	<ul style="list-style-type: none"> Leaks and spills from stored chemicals Spills from movement/transfer of chemicals 	<ul style="list-style-type: none"> Soil contamination from leaks and spills Surface water contamination from stormwater runoff 	2	<ul style="list-style-type: none"> All facilities to be in accordance with AS1940-2004 (The Storage and handling of flammable and combustible liquids) or to standards consistent with the requirements of the Dangerous Substances Regulations 2002 License under the Dangerous Substances Act 1979 obtained from SafeWork SA where required Safety controls and staff training Licensing/permits where appropriate System audits and checks
Workshops – aviation maintenance	<ul style="list-style-type: none"> Discharge of liquid waste into waterways Disposal of solid waste Disposal of hazardous waste Consumption of energy 	<ul style="list-style-type: none"> Soil contamination through leaks and spills Surface water contamination from stormwater runoff Increase waste to landfill 	2	<ul style="list-style-type: none"> Appropriately designed and approved facilities Safety controls and staff training Correct storage of materials Licensing/permits where appropriate

Table 1 - Environmental risk ratings for activities of Airport Tenants (continued)

Activity	Reason for Activity to Potentially Cause Environmental Harm	Potential / Impacts	Overall Activity Rating	Possible Management Strategy
Workshops – motor vehicle	<ul style="list-style-type: none"> Discharge of liquid waste into waterways Disposal of solid waste Disposal of hazardous waste Consumption of energy 	<ul style="list-style-type: none"> Depletion of natural resources (i.e. coal) Global warming Soil contamination through leaks and spills Surface water contamination from stormwater runoff Increase waste to landfill Depletion of natural resources (i.e. coal) Global warming 	2	<ul style="list-style-type: none"> Correct disposal of hazardous wastes Separation of waste streams Discharge monitoring System audits and checks Appropriately designed and approved facilities Safety controls and staff training Correct storage of materials Licensing/permits where appropriate Correct disposal of hazardous wastes Separation of waste streams Discharge monitoring System audits and checks
Workshops – electrical/IT/Other	<ul style="list-style-type: none"> Disposal of solid waste Consumption of energy 	<ul style="list-style-type: none"> Increased waste to landfill Depletion of natural resources (i.e. coal) Global warming 	2	<ul style="list-style-type: none"> Appropriately designed and approved facilities Safety controls and staff training Correct storage of materials Licensing/permits where appropriate Discharge monitoring System audits and checks
Aircraft refuelling	<ul style="list-style-type: none"> Accidental spillage of fuel VOC emissions from venting of fuel 	<ul style="list-style-type: none"> Increased waste to landfill Depletion of natural resources (i.e. coal) Global warming 	2	<ul style="list-style-type: none"> Control (safety) measures to reduce spills Emergency response (including spill kits and response plans) implemented Training of all operators Review refuelling practices to ensure best practice approach is adopted
Construction works	<ul style="list-style-type: none"> Elevated emissions of noise Generation of solid waste Generation of dust Degradation of water quality Disturbance of potential acid sulphate soils and runoff of acidic leachate Pollution of waterways Pollution of land/soil 	<ul style="list-style-type: none"> Damaged public reputation Increased waste to landfill Increased air pollution Increased sediment loads in waterways Destruction of native flora and fauna from acidic runoff Water and soil contamination through litter Loss to visual amenity 	2	<ul style="list-style-type: none"> Appropriately designed and implemented Construction Environmental Management Plan
General waste storage and removal	<ul style="list-style-type: none"> Pollution of waterways Pollution of land/soil 	<ul style="list-style-type: none"> Water and soil contamination through litter Loss to visual amenity 	3	<ul style="list-style-type: none"> Reduce, reuse and recycle materials Close bin lids when not in use Sufficient bins provided Regular waste removal through waste contract
Catering	<ul style="list-style-type: none"> Discharge of liquid waste into waterways Disposal of solid waste Consumption of energy 	<ul style="list-style-type: none"> Surface water contamination from stormwater runoff Increased waste to landfill Depletion of natural resources (i.e. coal) Global warming 	3	<ul style="list-style-type: none"> Appropriately designed and approved facilities Safety controls and staff training Correct storage of materials Licensing/permits where appropriate Discharge monitoring System audits and checks

Table 1 - Environmental risk ratings for activities of Airport Tenants (continued)

Activity	Reason for Activity to Potentially Cause Environmental Harm	Potential / Impacts	Overall Activity Rating	Possible Management Strategy
Mobile service vehicles	<ul style="list-style-type: none"> Discharge of fuels and oils from vehicles and equipment into surrounding soils and waterways 	<ul style="list-style-type: none"> Soil contamination from leaks and spills Surface water contamination from stormwater runoff 	3	<ul style="list-style-type: none"> Ensuring contractors comply with or have their own approved EMP Appropriately designed storage (parking) areas System audits and checks
Freight handling	<ul style="list-style-type: none"> Discharge of liquid waste into waterways 	<ul style="list-style-type: none"> Surface water contamination from stormwater runoff 	3	<ul style="list-style-type: none"> Storage areas to be covered Dangerous goods to be stored in appropriately designed bunded areas Stormwater controls in outdoor storage areas System audits and checks
Car parking areas	<ul style="list-style-type: none"> Discharge of hydrocarbons and surface water deposits into waterways Generation of litter Emission of fumes 	<ul style="list-style-type: none"> Surface water contamination from stormwater runoff Visual amenity impact Global warming 	3	<ul style="list-style-type: none"> Stormwater control, collection and treatment facilities to be investigated Provision of litter stations and awareness programs Ventilation of confined vehicle access areas
Ground running (i.e. aircraft maintenance)	<ul style="list-style-type: none"> Emissions of elevated noise levels 	<ul style="list-style-type: none"> Damaged public reputation Loss of amenity 	4	<ul style="list-style-type: none"> Investigate the need for control measures to reduce noise levels Implement AAL Ground Running Policy
Retail outlets	<ul style="list-style-type: none"> Discharge of liquid wastes into waterways Disposal of solid waste Disposal of hazardous wastes Consumption of energy 	<ul style="list-style-type: none"> Surface water contamination from stormwater runoff Increased waste to landfill Depletion of natural resources (i.e. coal) Global warming 	4	<ul style="list-style-type: none"> System audits and checks Correct disposal of hazardous wastes
Administration offices and terminal buildings	<ul style="list-style-type: none"> Disposal of solid waste Consumption of energy 	<ul style="list-style-type: none"> Increased waste to landfill Depletion of natural resources (i.e. coal) Global warming 	4	<ul style="list-style-type: none"> Recycle office paper, printer cartridges and cardboard Use energy efficient light bulbs Turn lights and non essential air conditioning off when not in use System audits and checks
Grounds maintenance	<ul style="list-style-type: none"> Discharge of chemicals (e.g. herbicides and pesticides) into waterways Disposal of empty chemical containers 	<ul style="list-style-type: none"> Surface water contamination from stormwater runoff Increased waste to landfill 	4	<ul style="list-style-type: none"> Procedures on stormwater drain maintenance be adopted and implemented through training and awareness Upgrade chemical storage areas

6. Operating Procedures

What management strategies will be used to minimise the adverse impacts of the company's operations on the environment?

With the activities and associated management strategies identified earlier, provide a detailed description of the procedures to be followed by company staff to manage and reduce the risk of negative environmental impact and, at the same time, achieve best practice environmental management. Always start with the highest risk activities (ie, those given the highest ranking). (1 denotes the highest risk and 4 is the lowest risk rating.)

If the company already has in place a Quality Management System or a Safety Management System existing procedures can be modified to ensure that impacts on the environment are minimised.

Holding a toolbox session to involve staff is a very effective way of involving people who have detailed knowledge of the activities. It is likely that staff will already know the best way to undertake an activity so it is usually a case of documenting this.

Example Standard Operating Procedure – Vehicle Washdown

TASK	VEHICLE WASHDOWN
Helpful Reference Documents	EPA 2004. Stormwater Management for Washbays. EPA 517/04. EPA April 2004.
Environmental Risk Rating	2

STANDARD OPERATING PROCEDURE

- 1 Never discharge wastewater, or let it escape, to the stormwater drainage system or the surrounding land
- 2 Carry out any washing in a covered and impervious area. It must be adequately bunded and drained to a holding tank or the sewer through a trade waste approved treatment system (usually an oil/silt interceptor trap or separator). The traps can be installed above or below ground as permanent or mobile installations (e.g. when premises are leased a mobile system may be preferred).
- 3 Direct wastewater to the sewerage system under the conditions of a Trade Waste Permit
- 4 For wastewater holding tanks, use quick-break degreasing compounds and detergents to reduce emulsification of oils and other hydrocarbons
- 5 Collect wastewater that is not reused, recycled or disposed of to sewer and dispose via a licensed waste removalist
- 6 Ensure ongoing maintenance of oil/silt interceptor trap/separator including the removal of sludge by a waste removalist
- 7 Mobile operations: Collect wastewater and other liquids from cleaning and dispose of properly. Liquid wastes must not spill, flow or drain on to the ground or to stormwater. In locations not serviced by a sewerage system, collect the wastewater in a sump for disposal via a licensed liquid waste removalist.

7. Staff Training

How are staff informed of what they need to do?

Staff training achieves:

- Environmental awareness among staff
- Enables familiarisation with the responsibilities for implementing the EMP
- Improved take up or implementation of the EMP through staff involvement and input

There are several ways to monitor staff training including:

- Include training as part of new staff inductions
- Incorporate training reviews into staff appraisals
- Develop a training register to document training

Example Staff Training Register

STAFF TRAINING REGISTER

Employee Name	Training Topic	Completed	Date Completed
David Smith	Vehicle Washdown	Yes/No	21 August 2007
Dean Thomas	Waste Management	Yes/No	28 August 2007

There are several methods that can be used for staff training, and include:

- Presentations at staff meetings
- Focus workshops
- Videos
- Posters and leaflets in the staff room

8. Emergency Procedures

Foreseeable risks and hazards should be identified and corrective actions should be developed before hand to prevent environmental harm as much as possible. A response to emergencies such as fire, explosions, spills (greater than 2L) should be recorded in a procedure to ensure that staff and the environment remain safe.

In the event of an emergency the primary response on airport is to call the Airport Coordination Centre (ACC). The operators will then contact relevant authorities, such as Aviation Rescue and Fire Fighting (ARFF), Metropolitan Fire Service (MFS) and Ambulance, and notify relevant AAL staff, such as the Environment Department. If required the Airport Emergency Plan will also be activated.

The following numbers should be included in your emergency plan

Contact Numbers:

Airport Coordination Centre – 8154 9444

Commonwealth Airport Environment Officer – 8110 2221

Local hospital or doctor's clinic



9. Documenting and Reviewing

Targets, policies, responsibilities and procedures also need to be documented. All of which should be reviewed on a regular basis to determine areas of further improvement and greater operational efficiency.

One of the most effective forms of review is an audit. Audits are designed to:

- Highlight areas of non-compliance
- Identify areas of potential improvement on a periodic basis
- Draw attention to improvements made as a result of the EMP implementation

The intention of an audit is to assist a company check their own performance.

A basic audit will comprise of the following components:

1. Review the company's EMP and procedures to identify how operations are intended to be undertaken
2. Determine whether the company has complied with its own documentation
3. Identify and report areas for improvement
4. Implement changes as necessary

An audit will involve looking at the standard operating procedures and determining whether or not the company is actually following the procedures. Checklists are useful tools to conduct an audit and can be tailored to meet the needs of an individual company.

Appendix A - Environmental Risk Rating

LEVEL OF ADVERSE EFFECT	RATING
Serious environmental harm:	1
<hr/> <ul style="list-style-type: none">• Occurs if the pollution harms, or has the potential to harm, the environment; or• The effect of the pollution is, or has the potential to be:<ul style="list-style-type: none">• Of high impact or on a wide scale; and• Irreversible; or• The pollution results, or has the potential to result, in substantial harm to public health or to public safety; or• The pollution results, or has the potential to result, in substantial damage to property.	
Material environmental harm:	2
<hr/> <p>Occurs if the pollution harms, or has the potential to harm, the environment and:</p> <ul style="list-style-type: none">• The effect of the pollution is, or has the potential to be, of significant impact; or• The pollution results, or has the potential to result, in harm to public health or to public safety; or• The pollution results, or has the potential to result, in damage to property (other than minor damage).	
Environmental nuisance:	3
<hr/> <p>Occurs if the pollution harms, or has the potential to harm, the environment and:</p> <ul style="list-style-type: none">• The effect of the pollution causes a change to the existing environment at a level considered less than that causing material environmental harm.	
Negligible:	4
<hr/> <p>A person must not, by act or omission, directly or indirectly cause environmental pollution that affects an area that consists of, or is included in, an airport site and:</p> <ul style="list-style-type: none">• The pollution takes the form of smoke, dust or odour; or• The effect of the pollution is:<ul style="list-style-type: none">• Of low impact; and• Transient; or• The effect of the pollution interferes unreasonably, or has the potential to interfere unreasonably, with the enjoyment of the area by a person occupying, or lawfully using, the area.	
References:	
<ul style="list-style-type: none">- <i>Environment Protection Act 1993 (SA)</i>- <i>Airports Act 1996</i>	

Appendix B - References and Further information

Airports Act 1996

Airports (Environment Protection) Regulations 1997

Australian Standard 1940-1993: The storage and handling of flammable and combustible liquids

Environment Protection Act 1993 (SA)

Environment Protection (Industrial Noise) Policy 1994 (SA)

Environment Protection (Waste Management) Policy 1994 (SA)

Environment Protection (Water Quality) Policy 2003 (SA)

EPA website. www.epa.sa.gov.au

EPA 2007. *EPA Guideline – Bunding and spill management* EPA 080/07 June 2007.

EPA 2004. *EPA Guideline – Disposal of used hydrocarbon absorbent materials* EPA 378/04 March 2004.

EPA 2004. *Stormwater management for washbays* EPA 517/04 April 2004.

EPA 2003. *Stormwater management for Auto servicing and mechanical repair workshops* EPA 493/03.

Dangerous Substances Act 1979 (SA)

Dangerous Substances Regulations 2002 (SA)

Petroleum Products Regulations Act 1995

SafeWork SA website. www.safeworksa.sa.gov.au

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