

AGL Corrective Action Register based on Independent Audit Recommendations

July 2014

[Note: these actions reflect the Audit Findings and Recommendations in Section 4 of the Independent Environmental Audit Report.]

Issue Raised in Audit Report	Auditor Recommendations	Actions taken by AGL	Action Due Date	Action Status	Notes
Air Monitoring - 1 Continuous Emissions Monitoring System (CEMS)	Resolve CEMS air monitoring issues in consultation with EPA	On 8th August 2013, AGL entered into an Enforceable Undertaking with EPA with an action to address this non-conformance.	8 February 2014	COMPLETED	
Air Monitoring - 2 Quarterly Sampling	Conduct air emissions monitoring on a quarterly basis on all compressors operating during that quarter.	Since September 2012, AGL has conducted air emissions monitoring on a quarterly basis on all compressors operating during that quarter.	Ongoing (each quarter)	COMPLETED	
Air Monitoring - 3 Sampling Positions	Sampling positions for quarterly air emissions monitoring at Points 1, 4 & 5 to be compliant with test method TM-1.	Points 1 & 4: Install second sampling port. Point 5: Install second sampling port. Consult with EPA in regards to minimum volumetric flow rate.	21 December 2013	COMPLETED	
Independent Audits	Ensure that suitably qualified and approved professionals are engaged early enough to allow completion of the audit and submission within the required timeframe.	AGL has improved its Upstream Gas Compliance Management System to ensure that all future auditors are engaged, with sufficient time to allow completion of the audit report and submission within the required timeframe.	Ongoing	COMPLETED	
Consultation	Ensure consultation with nominated regulatory authorities/stakeholders during the development or update of Plans in accordance with consent conditions.	AGL has improved the Upstream Gas Compliance Management System to ensure that all nominated stakeholders are identified and consulted with in accordance with consent conditions for future/ongoing operations. AGL has commenced updates to Plans since the audit and commenced consultation with relevant stakeholders prior to submission of relevant plans.	Ongoing	COMPLETED	
Land Subsidence	If AGL is satisfied, based on expert opinion that no subsidence monitoring is required, then they should seek to modify this condition accordingly.	AGL has engaged a suitably qualified expert to conduct subsidence monitoring. If the results confirm AGL's previous expert subsidence report prepared in April 2007 (risk of subsidence almost negligible) and hence monitoring is not required, AGL will seek to modify this condition.	31 December 2014	IN PROGRESS	AGL has commenced consultation with the DPE.
Reporting	Establish an appropriate system to identify reporting requirements, allocate responsibility and ensure submission within the required timeframe.	AGL has improved its Upstream Gas Compliance Management System, which will identify and track its reporting obligations, allocate responsibility and ensure submission within the required timeframe.	Ongoing	COMPLETED	
Reporting	Seek a modification of the development consent DA282-6-2003-1 to provide consistency with EPL 12003 (requirement for quarterly reports for waste transports and waste disposal facilities).	AGL will seek a modification of the development consent to provide consistency with EPL 12003.	31 December 2014	IN PROGRESS	AGL has commenced consultation with the DPE and EPA.
Noise Management	Review and revise the Noise Management Plan to establish effective monitoring tools to achieve compliance.	AGL has engaged an external noise consultant to update the latest Noise Management Plan.	31 October 2013	COMPLETED	
Water Monitoring	Seek a modification of DA 282-6-2003-1 to align with the conditions of EPL 12003 (water monitoring).	AGL will seek a modification of the development consent to provide consistency with EPL 12003.	31 December 2014	IN PROGRESS	AGL has commenced consultation with the DPE and EPA.