

## Camden Gas Project 2020 - 2022 Independent Environmental Audit Corrective Actions Register

29 May 2023

Non-compliance ID*	Reference	Condition	Non-Compliance	Auditor's Recommended Action	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
2022-NC-01	DA 15-1-2002, Condition 90	The Applicant shall establish a Community Consultative Committee to oversee the environmental performance of the development. This Committee shall: (f) meet at least quarterly.	<p>The auditor sighted correspondence from DPE to AGL (3 February 2020) approving a change in the frequency of CCC meetings from twice per year to annual. This change was conditional on:</p> <ul style="list-style-type: none"> <li>• <i>The committee members continuing to be kept fully informed of the project on a quarterly basis and given the opportunity to comment on matters arising from this consultation</i></li> <li>• <i>Due consideration is given to requests for extraordinary meetings</i></li> <li>• <i>A review of the meeting frequency in 2023 following the cessation of production.</i></li> </ul> <p>During the audit period, CCC meetings were conducted annually (September 2020 and September 2021) in accordance with the DPE approval. A non-compliance was identified with respect to the quarterly updates which were not consistently provided to the CCC during the audit period. Specifically, the October to December quarterly update was not provided during each financial year of the audit period.</p>	It is recommended that quarterly updates are provided to the CCC in accordance with the DPE approval.	Establish an Action in SAP Compliance to provide quarterly updates to Community Consultative Committee.	<b>31 December 2022</b>  (Complete – 19 December 2022)
	DA 282-6-2003, Condition 17 (c)	The Applicant shall ensure the continuation of the existing Sydney Gas Operations Camden Project Community Consultative Committee to oversee the environmental performance of the development. The Committee shall continue to be chaired by an independent chairperson approved by the Secretary in consultation with the Applicant, Camden Council, Campbelltown City Council and Wollondilly Shire Council. The Committee shall: (c) Meet at least quarterly.				
2022-NC-02	DA 282-6-2003, Condition 14	As part of an independent audit required under condition 18, the Vegetation and Landscape Management Plan must make provision for ensuring that landscaping of the Gas Treatment Plant site and surrounds is maintained in an adequate condition by providing details of a monitoring program. Monitoring must be carried out pursuant to the monitoring program every 6 months for the first two years from the commencement of planting and thereafter every 2 years by an independent and suitably qualified and experienced arborist whose appointment has been approved for the purposes of this condition by the Secretary.	<p>The auditor sighted the Landscape and Lighting Audit Report (20 May 2021) conducted by distinctive Living Design. The Landscape and Lighting Audit Report was prepared in accordance with the requirements of this condition.</p> <p>The auditor sighted correspondence from AGL to DPE (27 May 2021) enclosing the Landscape and Lighting Audit Report and providing evidence of close-out of the audit finding.</p>	It is recommended that the next Landscape and Lighting Audit is conducted in April 2023. Alternatively, AGL may consider seeking dispensation from the requirements of this condition based on the closure program.	Complete the next Landscape and Lighting Audit by 30 April 2023.	<b>30 April 2023</b>  (Complete – 05 April 2023)
	DA 282-6-2003, Condition 18	<p>The Applicant shall commission and pay the full cost of an Independent Audit of the performance of the mitigation measures implemented to prevent and minimise visual impacts of the proposal including landscaping, preservation of existing trees, and night-lighting effects. The audit must be conducted within 6 months of the commissioning of the proposed development and every 2 years thereafter, unless the Secretary directs otherwise. This audit must:</p> <ul style="list-style-type: none"> <li>a) Be conducted by an independent landscape expert who is suitably qualified and experienced and whose appointment has been approved by the Secretary;</li> <li>b) Assess the performance of the visual mitigation measures with specific reference to the effectiveness of mitigation measures in screening the development and lighting from the development from the Mount Gilead Homestead;</li> <li>c) Review the adequacy of the Vegetation and Landscape Management Plan;</li> </ul>	As part of the 2018-2020 IEA, the auditor sighted correspondence from DPE (2 August 2018) confirming that the 2018 Independent Audit was not required as the findings of the 2014 audit are likely to be representative of the current conditions. The DPE correspondence notes that “two yearly independent audits should resume from September 2020, unless agreed otherwise by the Secretary”. The Landscape and Lighting Audit Report (20 May 2021) was conducted on 8 April 2021 and as such, did not comply with the commencement date of September 2020.			

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		<p>d) Recommend actions or measures to improve the performance of the visual mitigation measures and the adequacy of the Vegetation and Landscape Management Plan (if required); and</p> <p>e) Be submitted to the Secretary; and</p> <p>Be implemented to the satisfaction of the Secretary.</p>				
2022-NC-03	PA 06_0137, Condition 4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.	The 2018 - 2020 IEA (Rev 2) is dated 25 May 2021. The auditor sighted a notice of receipt from the Major Projects Portal confirming that the CGP Environmental Management Plan and Sub-Plans were submitted to DPE on 3 December 2021. The EMP and Sub-Plans were not submitted to DPE within six months of completing the audit.	It is recommended that the EMP and Sub-Plans are reviewed on completion of the 2020-2022 IEA and submitted to DPE within six months of completion the audit.	Review, and if necessary, revise the Camden Environmental Management Plan and Sub Plans and submit to the Department of Planning and Environment within six months of the 2020-2022 Independent Environmental Audit Report.	14 May 2023 (Complete – 30 March 2023)
	PA 06_0138, Condition 4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the OEMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised OEMP shall be submitted to the Director-General within 6 months of completing the audit.				
	PA 06_0291, Condition 4.7	Following each Independent Environmental Audit, the Proponent shall review and if necessary revise the EMP (and any documents contained in the plan), to the satisfaction of the Director-General. The revised EMP shall be submitted to the Director-General within 6 months of completing the audit.				
2022-NC-04	EPL 12003 L2.1	The actual load of an assessable pollutant discharged from the premises during the reporting period must not exceed the load limit specified for the assessable pollutant in the table below. Note: An assessable pollutant is a pollutant which affects the licence fee payable for the licence.	The auditor sighted the December 2020 and December 2021 Annual Returns. There were no exceedances of load limits reported in the December 2020 Annual Return. In the December 2021 Annual Return, the reported loads of two assessable pollutants (benzene and hydrogen sulfide) exceeded the specified load limits. Due to an inadvertent oversight, the matter was not specifically identified as a non-compliance in the Annual Return. A Show Cause Letter was subsequently issued by the EPA on 11 April 2022. AGL submitted a response to the Show Cause Letter on 28 April 2022, including corrective actions. The EPA determined on 3 May 2022 that further regulatory action would not be progressed.	There are no additional corrective actions recommended by the auditor.	AGL has updated the Annual Return Load Based Licence data report to ensure that any future exceedances of load limits are identified and reported in the Annual Return.  No further action is required.	
2022-NC-05	EPL 12003 M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	<p>The auditor sighted the following air monitoring results prepared by Ektimo:</p> <ul style="list-style-type: none"> <li>Quarterly Emission Testing, Report R009563 (Test dates 2 – 4 September 2020 and 24 September 2020)</li> <li>Quarterly Emission Testing, Report R010216 (Test date 4 December 2020)</li> <li>Quarterly Emission Testing, Report R010547 (Test dates 11 March 2021 and 1 April 2021)</li> <li>Quarterly Emission Testing, Report R010867 (Test date 11 and 12 May 2021)</li> <li>Quarterly Emission Testing, Report R011306 (Test date 4 – 6 August 2021)</li> <li>Quarterly Emission Testing, Report R012129 (Test date 2 December 2021)</li> </ul>	There are no recommended corrective actions.	AGL has previously disclosed this non-conformance to the EPA.  No further action is required.	
	EPL 12003 M2.2	Air Monitoring Requirements [Refer to the Tables in EPL 12003]				
	EPL 12003 M2.5	For the purposes of Condition M2.2, the selection of sampling positions for quarterly monitoring at points 1, 2,				

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		3, 4 and 6 must be carried out in accordance with test method TM-1 as specified in Approved Methods for the Sampling and Analysis of Air Pollutants in NSW, as in force from time to time.	<ul style="list-style-type: none"> <li>Quarterly Emission Testing, Report R012440 (Test dates 25 February and 21 March 2022)</li> <li>Quarterly Emission Testing, Report R012775 (Test dates 5 – 6 May 2022).</li> </ul> <p>There were no errors noted in the above reports and compliance was demonstrated against the sampling method, units of measure and frequency as defined in this condition.</p> <p>As detailed in the Annual Return for the reporting period 22 December 2020 to 21 December 2021, the quarterly monitoring of Discharge Point 1 was scheduled to be carried out by specialist air emissions monitoring consultants on 11 March 2021. Compressor Engine 1 experienced an unplanned outage due to mechanical issues and was not operational during the monitoring event. Compressor Engine 1 was not returned to service within the quarter and as such, scheduled quarterly monitoring was not undertaken for the period of 1 January to 31 March 2021.</p> <p>On 10 October 2022, AGL advised the EPA that Condition M2.1 was not fully satisfied in the first quarter of the licence period. Compressor 1 experienced mechanical faults and was offline during the monitoring event. Although Compressor 1 was briefly returned to service on 4 March, it was offline again on 5 March for the duration of the quarter. As such, scheduled quarterly monitoring was not undertaken for the period of 1 January to 31 March 2022.</p>			

\*Non-compliance ID as per 'INDEPENDENT ENVIRONMENTAL AUDIT 2020-2022 '