

# **EPA overview of compliance audit on AGL Licence No. 12003**

30 July 2014

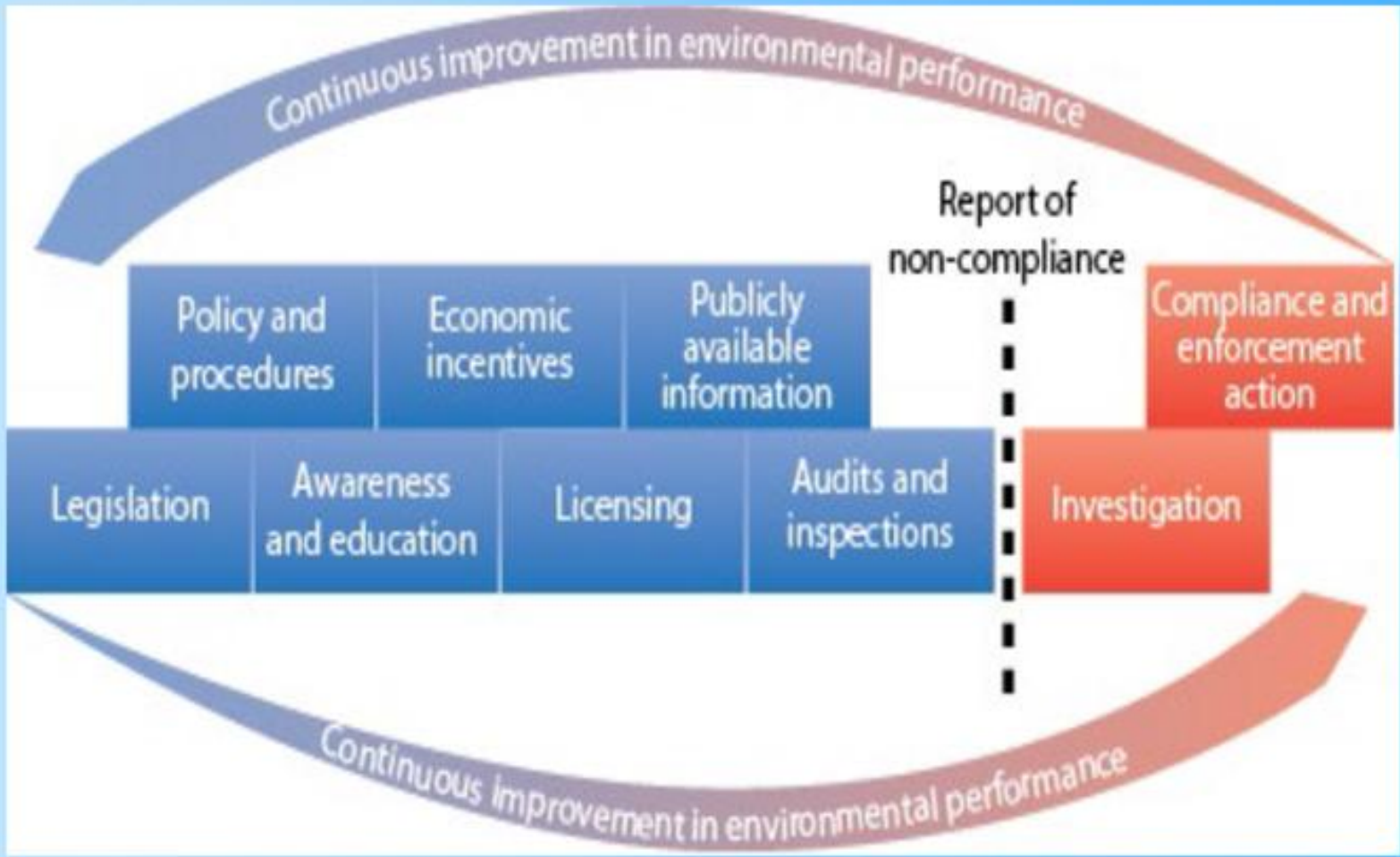
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**A/Manager Compliance and Assurance Section**

# EPA's Compliance Policy

- Summarises EPA's approach to compliance and enforcement
- Explains how EPA undertakes its activities to achieve compliance and drive improved environmental performance
- The Policy is available on the EPA website at:  
<http://www.epa.nsw.gov.au/legislation/130251epacompl.htm>

# EPA's Regulatory System



## EPA's Compliance Audit Program

- Help ensure integrity of the EPA's licensing system
- Increase community confidence in EPA's regulation of industry
- Consistency in the EPA's regulation of industry
- Contribute to improved industry environmental performance
- Compliance Audit Handbook available at <http://www.epa.nsw.gov.au/resources/licensing/cahandbook0613.pdf>.

## Types of audits

- Sector based audits e.g. Coal Mines
- Activity based audits e.g. Chemical Storage
- Focused audits e.g Wastewater management

## Our audit reports

- Exec Summary
- Intro including Scope/Objectives/Criteria/evidence
- Assessment of compliance – Table
- Further Observations
- Action program
- Licensee response
- EPA final letter

# Risk assessment of non-compliances

		Likelihood of Environmental Harm Occurring		
		Certain	Likely	Less Likely
Level of Environmental Impact	High	Code Red	Code Red	Code Orange
	Moderate	Code Red	Code Orange	Code Yellow
	Low	Code Orange	Code Yellow	Code Yellow

Blue colour - relate to administrative, monitoring and reporting requirements. Non-compliance with these conditions is given a blue colour code.

# Compliance Audit of AGL's Rosalind Park Gas Plant

- The EPA undertook an unannounced audit inspection of AGL's activities at the premises on 17 and 19 July 2013.
- The audit assessed AGL's compliance with all the conditions of their Environment Protection Licence.



## What non-compliances were identified?

- Five (5) code yellow non-compliances :
  - Three (3) relating to air and
  - Two (2) relating to water.
- Twelve (12) code blue non-compliances.

## Yellow non-compliances - air emissions?

- Exceedances of oxides of nitrogen emission limits at **two** separate discharge points
- Not operating continuous emissions monitoring equipment in a proper and efficient manner

## Yellow non-compliances – water issues?

- Not managing water pollution risks associated with the storage of oily water in underground storage tanks.
- Not having spill containment measures in place during the loading and unloading of produced water to the flare pit.

## Blue non compliances

- 7 non-compliances related to air monitoring requirements including not using the required sampling methods, monitoring at the required frequency and recording all required details.
- 2 non-compliances related to water monitoring requirements including not using the required sampling method and not monitoring for the correct pollutant.
- 1 non-compliance was for not reporting all required information in the noise compliance monitoring report.
- 2 non-compliances were for not recording all required information in relation to pollution complaints and not submitting the Annual Return within the required time.

## What actions have been taken in relation to non-compliances?

- Enforceable Undertaking
- Penalty Infringement Notices
- AGL has reviewed their procedures for managing waste water and developed a corrective action plan which is being progressively implemented.
- Licence variation

The report is on the EPA Public Register at:

<http://www.epa.nsw.gov.au/prpoeoapp/ViewPOEONotice.aspx?DOCID=-1&SYSUID=1&LICID=1522740>

**Visit the EPA's Compliance Audit webpage on**

<http://www.epa.nsw.gov.au/licensing/complianceaudit.htm>

**Comments?**