

Department of Planning, Industry and
Environment
C/- Rose-Anne Hawkeswood
GPO BOX 39
SYDNEY NSW 2001

APPLICATION

DE-2018/129

Date

20 December 2019

Dear Rose-Anne

Development	Port Kembla Gas Terminal
Location	Lot 22 Port Kembla Road, PORT KEMBLA NSW 2505

I am writing in response to the Departments request of 2 December 2019 to provide advice on the proposed modification of the Port Kembla gas terminal. Council has reviewed the documentation and provides the following comments.

General

Council understands that the proposal will increase the gas capacity (increase the output of the FSRU) from the approved amount of 100 PJ of natural gas per annum. The EA states that project will not significantly alter the approved construction footprint or methodology. However, there will be an increase to the overall number of LNG carrier deliveries per year from 24 to up to 52 LNG carriers per year. In order to increase capacity of natural gas per annum an increase in scheduled deliveries is required along with pipeline upgrades yet the EA also states that the proposal would not require additional infrastructure or construction methodologies compared to the EIS. It is unclear what the implications of the pipeline upgrade are.

According to the EA, the implications arising from the proposal include the operation of LNG trains, booster pumps, seawater discharge, and scheduling and options for LNG carriers. The EA also states that soils, contamination, terrestrial biodiversity, heritage, traffic and access, waste management, climate change risk, noise and vibration, air quality and cumulative impacts would not result in incremental or cumulative exceedances at the sensitive receptor locations. As a result, the key issues potentially affected by the proposal include, greenhouse gas, hazard and risk, noise and vibration, air quality, water resources, marine ecology, port navigation, and social and economic matters.

Council has provided general commentary in relation to greenhouse gas, hazard and risk (sensitive receptors), noise and vibration, air quality but recognises that the Department will receive additional detailed input from Agencies and this expert input will also extend to water resources, marine ecology and port navigation. Council understands that the project will be regulated with a requirement for annual reporting.

Greenhouse gas

The EA indicates that the updated greenhouse gas emissions inventory indicated that there would be an increase of 19% in the annual greenhouse gas under the indicative high season. On 9 December 2019 Council resolved to adopt a science-derived greenhouse gas emissions reduction target of net zero emissions by 2050 but recognised that is not solely responsible for the implementation of actions to achieve this target. Council also resolved to work towards an aspirational greenhouse gas emissions reduction target of net zero emissions by 2030. Whilst Council recognises the need for the project and

understands the economic benefits, this increase is not in line with Council aspirations. Council would encourage the applicant to explore opportunities to limit any increases to current approved levels.

In addition, there is potential for exhaust concentrations from the FSRU to exceed the NOx emissions limit in the Protection of the Environment Operations (Clean Air) Regulation 2010 if it is run on marine diesel oil. This should not exceed the limits imposed by condition 8 (schedule 2) of the consent which limits the operation of FSRU. Consideration should be given to not removing this condition as suggested by the proponent.

Sensitive receptors

Council notes that assessments were made against the criteria for injury at sensitive and residential areas for the high season scenario based on a throughput of 500 TJ/day. The potential for heat flux causing injury would extend marginally beyond the site boundary but would not affect any sensitive or residential areas. The results also indicated the potential for explosion overpressure causing injury would be contained within the site boundary and would not have the potential to affect sensitive and residential areas. The nearest residential receptor is located approximately 2km south of the proposal which is outside of the radii shown in Fig 5.2 (p22) of the EA. It is noted that high season operation will be restricted to the cooler winter months and the spring and autumn shoulder seasons. This timeframe should be conditioned to take advantage of the prevailing weather conditions (west-south-west airflows) at this time of year which will minimise potential impacts on sensitive receptors should any emergency arise including gas leakage.

Noise and vibration

Background noise monitoring was undertaken at two residential locations in Port Kembla in 2018 but has not been updated. However, an updated noise and vibration assessment considering the proposed modification states that the modification would be consistent with the EIS therefore additional measures to avoid, mitigate and manage impacts are not necessary. In this regard the existing conditions of consent should remain relevant.

Air quality

The proposed modification includes an adjustment to Condition 8 (schedule 2) to allow the condition to be waived subject to data demonstrating compliance with the Protection of the Environment Operations (Clean Air) Regulation 2010. However, in the discussion on greenhouse gas the proponent requests that the condition be removed. As outlined above, there is potential for exhaust concentrations from the FSRU to exceed the NOx emissions limit if it is run on marine diesel oil. Consideration should be given to not removing or waiving this condition as suggested by the proponent.

This letter is authorised by

Pier Panozzo

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Wollongong City Council
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