11 Statement of commitments

This chapter identifies the commitments proposed to manage the potential impacts resulting from the proposed modification, as well as the requested amendments to the Project approval (PA 08_0154) and Concept Plan approval (CA 08_0154).

11.1 Statement of commitments

The existing commitments made in the AECOM (2009a) EA and the requirements of the Project approval are sufficient to address predicted impacts from the proposed modification. No additional management, mitigation or monitoring measures are proposed.

Table 11.1 summarises the relevant conditions in the Project approval already in place that address the outcomes of this EA, as presented in Chapters 6 to 10 and Appendices C to F.

Table 11.1 Summary of relevant Project approval conditions

Environmental attribute	Recommendation/management	Relevant Project approval condition
Ecology		
Seaham	Surrounding remnant vegetation • Implement sedimentation and erosion controls • Undertake follow up weed control	3.2, 7.3(a) and 7.3(c)
	Drainage lines • Implement sediment and erosion controls before trenching of watercourses (ID to 138 to 141)	3.2 and 7.3(c)
Brandy Hill	Swamp Oak Floodplain Forest (EEC), Hunter Lowland Redgum Forest (EEC) and 'Marginal' habitat for Koala under the Port Stephens Council CKPoM. • Where clearing of EECs and Koala habitat is required, the ROW will be minimised to 15 m wide, and clearing of trees avoided where feasible. • Implement and regularly check sediment and erosion controls • Undertake follow up weed control	3.2, 7.3(a) and 7.3(c)
	Adjacent Barties Creek (constructed irrigation channel) • Implement and regularly check sediment and erosion controls	3.2 and 7.3(c)
Millers Forest	Drainage lines • Implement sedimentation and erosion controls	3.2 and 7.3(c)
Tomago	Swamp Oak Floodplain Forest (EEC) • Where clearing is required, the ROW will be minimised to 15 m wide and clearing of trees avoided where feasible. • Implement and regularly check sediment and erosion controls • Undertake follow up weed control	3.2, 7.3(a) and 7.3(c)
	Tributary of Francis Greenway Creek • Implement sediment and erosion controls before trenching	3.2, 7.3(a) and 7.3(c)
	Hunter River • Underboring or HDD will be set back from the riparian areas to avoid the fringing Mangrove Forest and patch of Swamp Oak Forest (EEC) at KP 92 (Rev F)	3.2, 7.3(a), 7.3(b) and 7.3(c)

Table 11.1 Summary of relevant Project approval conditions

Environmental attribute	Recommendation/management	Relevant Project approval condition
Aboriginal cultural heritage		
All sections	Disturbance of previously unidentified Aboriginal objects • AGL will cease work in the immediate vicinity if during the course of construction, they become aware of any previously unidentified Aboriginal objects Management of construction activities and consultation with RAPs • AGL will implement measures to manage potential impacts and consult with the RAPs during construction of the proposed pipeline corridor realignments	3.35 and 7.2(iv)
Noise		
All sections and the TRS	Construction noise management to minimise impacts to nearby receptors • Construction activities of the modified pipeline and the TRS will be managed and impacts to surrounding nearby receptors minimised. Blasting management to minimise impacts to nearby receptors • Blasting activities of the modified pipeline and the TRS will be managed and impacts to surrounding nearby receptors minimised. Management of complaints during construction and operation • Complaints from the community regarding construction and operational activities of the modified pipeline and the TRS will be managed and handled appropriately.	3.14, 3.15, 3.17, 7.2(g) 3.18, 3.20, 3.21 6.2, 6.3
TRS	Operational noise management to minimise impacts to nearby receptors • Operational noise of the TRS will be managed and impacts to surrounding nearby receptors minimised.	3.24, 7.4(e)iii
Hazard and risk		
Seaham	MLV final location • AGL will prepare a FHA which will provide a quantitative evaluation of the risk	3.47(c)
Tomago	The placement of the pipeline in proximity to an existing high pressure pipeline in the cleared easement to the TRS • AGL will prepare a FHA which provide a quantitative evaluation of the risk	3.47(c)
Soils		
All sections	Encountering ASS during construction activities • The existing draft ASSMP will be finalised to incorporate the modified pipeline corridor alignment	1.1(f), 7.3(c)i and 7.3(c)iii
Surface water		
All sections	Watercourse crossings • The revised watercourse crossing locations due to the proposed modification will be included within the Watercourse Crossing Management Strategy Ground disturbance • Construction activities will manage soil and erosion to minimise effects to surface water quality, both in the immediate area and downstream	3.4, 7.3(b)

Table 11.1 Summary of relevant Project approval conditions

Environmental attribute	Recommendation/management	Relevant Project approval condition
Groundwater		
All sections	Groundwater interception with ASS during trenching • The modified sections will require pre-construction investigations to be undertaken in relevant areas to determine ASS and implementation of appropriate management strategies	7.3(c)i
Air quality		
Tomago	TRS discharges to air due to dual water bath heaters • A discharge monitoring point will be established at the TRS and monitor relevant emissions similar to the requirements of the HDS stated in the Project approval	3.30, 3.31 and 4.5
Socio-economic		
All sections	Community stakeholder engagement • The Community and Stakeholder Engagement Plan will be updated to incorporate the modified pipeline corridor alignment	6.5
Visual		
Tomago	Building materials • AGL will consider the use of building materials and treatments for the TRS which visually complement the surrounding land uses	3.40

11.2 Amendments to Project and Concept Plan approvals

The Project approval and Concept Plan approval (PA 08_0154 and CA 08_0154) will need to be updated to reflect the description of the approved project once modified.

The following specific amendments are requested to conditions in Schedule 2 of PA 08_0154 as a result of the proposed modification:

Condition 3.22 of Schedule 2 – replace HDS with the TRS in Table 3 – Operational Noise Limits:

Table 11.2 Amendment to Table 3 – Operational Noise Limits

Project component	Location	Project specific noise limit (night-time period)	
		dB(A) $L_{Aeq(15\ minute)}$	dB(A) $L_{A1(1\ minute)}$
Tomago Receiving Station	P18[1]	49	59
	P19[2]	49	59
	P20[3]	42	52
	P21[4]	51	61

Note: *1. Receptor identified as R37 in the Minor Pipeline Corridor Realignments EA.*

2. Receptor identified as R38 in the Minor Pipeline Corridor Realignments EA.

3. Receptor identified as R39 in the Minor Pipeline Corridor Realignments EA.

4. Receptor identified as R41 in the Minor Pipeline Corridor Realignments EA.

Condition 3.24 of Schedule 2 –remove reference to the HDS:

Detailed Design Noise Report

Unless otherwise agreed to by the Director-General, at least 3 months prior to the commencement of construction of the central processing facility, the Proponent shall in consultation with EPA prepare and submit a Detailed Design Noise Report for the Director-General's approval to confirm the predicted noise levels associated with the central processing facility considering all reasonable and feasible at-source control measures (based on detailed design) at the sensitive receptors identified in Table 3.

Condition 3.25 of Schedule 2 – remove reference to the HDS:

Acquisition Rights

Unless otherwise agreed to by the Director-General, where the Detailed Design Noise Report required to be prepared under condition 3.24 predicts exceedances of greater than 5 dB(A) of project specific noise limits at any sensitive receptor identified in Table 3 for the operation of the central processing facility, the relevant receptors shall be subject to acquisition rights in accordance with condition 3.26 unless a negotiated agreement is in place with respect to that receptor in accordance with condition 3.22. The Proponent shall ensure that any receptor subject to acquisition rights is notified of his/her rights as outlined in condition 3.26 within one month of the Department's approval of the Detailed Design Noise Report.

Condition 3.27 of Schedule 2 – remove reference to the HDS:

At-Receptor Acoustic Treatment

Unless otherwise agreed to by the Director-General, where the Detailed Design Noise Report required to be prepared under condition 3.24, predicts exceedances of project specific noise criteria of no greater than 5 dB(A) at any sensitive receptor identified in Table 3 for the operation of the central processing facility, the relevant receptors shall be eligible to receive at–receptor acoustic treatments, at the Proponent's expense, to minimise noise impacts at the receptors as far as reasonable and feasible, unless operational noise monitoring undertaken in accordance with condition 4.3 confirms that project specific noise limits would be achieved at these receptors. All receptors eligible for at-receptor mitigation measures in accordance with the requirements of this condition shall be informed of their rights following the confirmation of noise levels at these receptors as part of the Noise Verification Report required to be prepared under condition 4.3, within one month of the Director-General's approval of that Noise Verification Report.

Condition 3.30 of Schedule 2 – replace the HDS with the TRS in Table 4 – Identification of Air Monitoring and Discharge Points:

Table 11.3 Amendment to Table 4 – Identification of Air Monitoring and Discharge Points

Monitoring/Discharge Point Identifier	Monitoring/Discharge Point Location
1	Water Bath Heater, Tomago Receiving Station

Condition 3.31 of Schedule 2 – replace the HDS with the TRS in Table 5 – Maximum Allowable Discharge Concentration Limits (Air) and remove the HDS:

Table 11.4 Amendment to Table 5 – Maximum Allowable Discharge Concentration Limits (Air)

Discharge Point	Pollutant	Units of Measure	100 Percentile Limit (mgm-3)	Averaging Period	Reference conditions
1 (TRS)	Oxides of Nitrogen	mg/m^3	250	1 hour	dry, 273 K, 101.3 kPa, and 3% O2
	Volatile organic compounds or carbon monoxide	mg/m^3	40 (VOCs) or 125 (CO)	Rolling 1 hour	dry, 273 K, 101.3 kPa, and 3% O2

Condition 3.47 of Schedule 2 – amend to include references to the MLV facility in relevant hazard study:

> (c) a Final Hazard Analysis consistent with the Department's '*Hazardous Industry Planning Advisory Paper No.8, HAZOP Guidelines*'. The final design shall apply appropriate risk mitigation measures for the Export Sales Pipeline in locations where the pipeline risk transects exceed the Department's risk criteria and for the main line valve. Further, the final design shall consider all recommendations in Table A1.1 to A1.5 of the PHA presented in the EA and the Addendum to the PHA in the Minor Pipeline Corridor Realignments EA.

Condition 4.5 of Schedule 2 – replace the HDS with the TRS in Table 6 – Periodic Pollutant and Parameter Monitoring (Air) and remove the HDS:

Table 11.5 Amendment to Table 6 –Periodic Pollutant and Parameter Monitoring (Air)

Discharge point	Pollutant/parameter	Unit of measure	Method	Frequency
1 (TRS)	Oxides of nitrogen	mg/m^3	TM-11	Post-commissioning and annually thereafter
	CO or VOCs	mg/m^3	T-34 or TM-32	
	Velocity	m/s	TM-2	
	Volumetric flow rate	m^3/s	TM-2	
	Temperature	^oC	TM-2	
	Moisture	%	TM-22	
	Dry gas density	kgm^3	TM-23	
	Molecular weight of stack gases	g/gmol	TM-23	
	Oxygen	%	TM-25	
	Carbon dioxide	%	TM-24	
	Selection of sampling positions	-	TM-1	-