



DOC20/246757-4

Ms Rose-Anne Hawkeswood
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

By email : Rose-Anne.Hawkeswood@planning.nsw.gov.au

Dear Ms Hawkeswood

Port Kembla Gas Terminal (SSI 9471 MOD 1) – Draft Consolidated Consent Conditions

I refer to the email dated 27 March 2020 from the Department of Planning, Industry and Environment (DPIE) (Planning) to the NSW Environment Protection Authority (EPA) seeking comments on the above revised conditions.

The EPA has reviewed these revised conditions and provides the following comments to assist in the assessment and determination of this project.

Schedule 3, Condition 3, Water Quality Verification and Monitoring Program

- EPA suggests adding the word “ongoing” under Condition 3(a) to capture the long-term nature of the program: *Eg. describe the ongoing water quality monitoring that would be undertaken...*
- Condition 3C(b) says “*if required, recommend changes to the discharge limit(s) in the EPL for TRC and temperature based on the results of the verification program*”. EPA suggests this requirement be deleted as it pre-empts condition 3C(c) which considers contingencies and mitigation options before potentially revisiting limit conditions if a compliance issue was identified.

Schedule 3, Condition 32A, Air Quality Verification Assessment

- EPA suggests modifying this condition to reflect the following wording and help match the *Water Quality Verification and Monitoring Program* wording.

“Prior to the commencement of operations, the proponent must prepare an Air Quality Verification Program in consultation with the EPA and to the satisfaction of the Planning Secretary.

The program must include but not be limited to the following:

- *The steps to confirm point source emissions and predicted ground level concentrations are consistent with the Air Quality Assessment submitted for the project approval and modification.*

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- *Identify how the assumptions and parameters used in the Air Quality Assessment will be verified; including operational and other variables, assumptions used for LNG carrier emissions; and meteorological data*
- *Be based on actual FSRU engine utilisation data and emission performances.*
- *Identify contingency measures that would be implemented to address any exceedances of predicted air quality impacts*
- *Be conducted in accordance with the Approved Methods for Modelling and Assessment of Air Pollutants in NSW (Approved Methods).*
- *Any monitoring conducted to confirm emission performances must be conducted in accordance with Approved methods unless otherwise agreed in writing by the EPA.*

The Proponent must implement the approved Air Quality Verification Plan for the development

The EPA is happy to discuss any of the above matters with DPIE (Planning) and the proponent at a mutually convenient time, if required.

Please contact Greg Newman on (02) 4224 4100 should you require any further information.

Yours sincerely



30/03/2020

GISELLE HOWARD
Director Regulatory Operations – Metro South
Environment Protection Authority