

BAKER Tony

From: CAMPIN Dave
Sent: Wednesday, 14 October 2015 8:03 PM
To: OTTENS Phillip
Cc: BAKER Tony; LANGFORD Andrew
Subject: Re: API Standards flaring advice
Attachments: image003.png

API standards offer a range of elements that are open to uptake. They are somewhat different to ISO standards (say AS/ISO 1940 dealing with the storage of dangerous goods). EHP probably used to say "if you store these materials you must implement that standard in full". With the flare the design specs are optional and QGC/Bechtel have opted out of a number of the elements, particularly those relating to environmental performance.

The real problem I see is that the design process did not involve EHP at the engineering level. They were not required to share the design process which is what should have happened and would have cut away from the result now.

If a ground flare had been installed there would have been no emissions of note, similarly if steam was available there would be much less (maybe not total) smoke.

The performance specs you mention are sourced from USEPA

Sent from my iPad
Dave Campin
Queensland International Fellow
Principal Technical Specialist
Department of Environment and Heritage Protection

On 14 Oct 2015, at 14:50, OTTENS Phillip <Phillip.Ottens@ehp.qld.gov.au> wrote:

Hi Dave,

I've been working with Tony Baker and the P&G unit to amend QGC's LNG flaring EA conditions as a result of ongoing smoky flaring events on Curtis Island and was advised that you have been reviewing the American Petroleum Institute (API) Standards 521 & 537 which relate to flaring systems and design.

I'd be appreciative if you could please confirm the following information about the API Standards to justify proposed amendments as follow

- API 521 refers to the standard which a flare must be designed to. Specifically when designing a flaring system for an LNG plant, a flare must be equipped with a flare tip designed to prevent visible smoke and particulate emissions during a flaring event; and
- API 537 refers to the standard which outlines how to bring an LNG plant back to normal operating conditions during a flaring event. Specifically does the standard state that during a flaring event, visible smoke and particulate emissions must not be emitted for more than five minutes in any two hour period while the plant is returned to normal operating conditions.

Please provide confirmation or clarification regarding the above by COB 16 October 2015.

Many thanks,

Release



Phillip Ottens

Team Leader

Petroleum and Gas

Department of Environment and Heritage Protection

P 07 3330 5979

Level 7, 400 George St, Brisbane QLD 4000

GPO Box 2454, Brisbane QLD 4001

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RTI Act 2009

Release

BAKER Tony

From: VENZ Mark
Sent: Monday, 23 November 2015 4:06 PM
To: adrian.jeffreys@premiers.qld.gov.au; Ian Robertson (Ian.Robertson@dsd.qld.gov.au); Andrew Broadbent (Andrew.Broadbent@dsdip.qld.gov.au); DATE Bill
Cc: Michelle.Parker@premiers.qld.gov.au; MACKAWAY Clancy; BAKER Tony; Bernadette Zerba; BURGESS-DEAN Rachel; LENZ Anne; LANGFORD Andrew
Subject: RE: Compliance strategy QGC Flare at Gladstone

Adrian, Bill, Ian and Andrew,

Further to the previous advice below, QGC have been issued and have paid an Infringement notice for a black smoke event on 10 March 2015 and EHP investigators are currently investigating other incidences consistent with the Alert below.

Now that the infringement notices is uncontested, EHP will be meeting with QGC (Tracey Winters) this week to begin discussions around the amendment of the flare conditions through a statutory process (Notice of Proposed Amendment). It is possible that QGC will take issue with this and may raise this with multiple departments at senior levels or even Ministerial levels.

This information is supplied to allow you time to brief necessary people within your organisations. The meeting is planned for later this week.

Please don't hesitate to call if you have any concerns or questions.



Mark Venz
Director
Petroleum and Gas
Department of Environment and Heritage Protection

Ph: 07 3330 5534
MOB: [REDACTED] Preju
mark.venz@ehp.qld.gov.au
Lvl 7, 400 George St Brisbane
GPO Box 2454 Brisbane Qld 4001

From: VENZ Mark
Sent: Friday, 16 October 2015 1:39 PM
To: 'adrian.jeffreys@premiers.qld.gov.au'; Ian Robertson (Ian.Robertson@dsd.qld.gov.au); Andrew Broadbent (Andrew.Broadbent@dsdip.qld.gov.au); DATE Bill
Cc: Michelle.Parker@premiers.qld.gov.au; MACKAWAY Clancy; BAKER Tony; Bernadette Zerba; BURGESS-DEAN Rachel
Subject: RE: Compliance strategy QGC Flare at Gladstone

Adrian, Bill, Ian and Andrew,

I have previously sent information to you regarding proposed compliance action on QGC for their Gladstone flare (see below). We are meeting with them this afternoon [REDACTED]

[REDACTED]



Mark Venz
Director
Petroleum and Gas
Department of Environment and Heritage Protection

Ph: 07 3330 5534
MOB: ~~sch4p3(3) Preju~~
mark.venz@ehp.qld.gov.au
Lvl 7, 400 George St Brisbane
GPO Box 2454 Brisbane Qld 4001

From: VENZ Mark
Sent: Thursday, 1 October 2015 1:09 PM
To: 'adrian.jeffreys@premiers.qld.gov.au'; Ian Robertson (Ian.Robertson@dsd.qld.gov.au); Andrew Broadbent (Andrew.Broadbent@dsdip.qld.gov.au); DATE Bill
Cc: Michelle.Parker@premiers.qld.gov.au; MACKAWAY Clancy; BAKER Tony; Bernadette Zerba; BURGESS-DEAN Rachel
Subject: Compliance strategy QGC Flare at Gladstone

Adrian, Bill, Ian and Andrew,

Further to earlier contact made to you all by Rachel Burgess-Dean and me a few weeks ago, I wish to advise there was a delay in making contact with QGC to initiate the strategy for enforcement action about QGC's Gladstone Flare at their LNG facility. I have just sent an internal Alert which I anticipate will be to our Minister by COB today (see below). Once we know this has been received we will be meeting with QGC to discuss the strategy prior to sending them a letter (which was foreshadowed in the draft brief attached to my previous email to you as background information).

As per my previous advice to you, there is a possibility that QGC may make representations to your department's or even at Ministerial level. This information (and that provided to you on 09/09) is supplied to allow you time to brief necessary people within your organisations.

Please don't hesitate to call if you have any concerns or questions.

Kind Regards



Mark Venz
Director
Petroleum and Gas
Department of Environment and Heritage Protection

Ph: 07 3330 5534
MOB: ~~sch4p3(3) Preju~~
mark.venz@ehp.qld.gov.au
Lvl 7, 400 George St Brisbane
GPO Box 2454 Brisbane Qld 4001

~~sch3(10)(1)(i) Prejudice protection of persons, property or the enviro~~

BAKER Tony

From: LOVE David
Sent: Friday, 3 July 2015 12:12 PM
To: STRIDE Cherie; BAKER Tony
Cc: SMEMAN Danielle; MAXWELL Aimee
Subject: RE: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

sch3(10)(1)(b)1 came in to discuss this. In some detail ...

I will add a widget to ecotrack

He will likely be sending an email requesting the EE report now it has been accepted.

David Love

Team Leader, Central Queensland Compliance, Gladstone
Environmental Services and Regulation.

Telephone 07 4971 6508

Mobile: sch4(3) Prejud

Email: David.love@ehp.qld.gov.au

Department of Environment & Heritage Protection
Level 2 20-22 Herbert Street, Gladstone QLD 4680
PO Box 5065, Gladstone QLD 4680

From: STRIDE Cherie
Sent: Friday, 3 July 2015 11:16 AM
To: BAKER Tony
Cc: SMEMAN Danielle; LOVE David; MAXWELL Aimee
Subject: FW: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

Tony, who would you like me to allocate this to?



Cherie Stride

Environmental Support Officer

Coal & Central QLD Compliance | Gladstone

Department of Environment and Heritage Protection

P 07 4971 6533 | VoIP 22533

Level 2 | 20-22 Herbert St Gladstone 4680

PO Box 5065 Gladstone 4680

From: Pollution Hotline
Sent: Friday, 3 July 2015 10:23 AM
To: CW ES_Gladstone
Cc: sch3(10)(1)(b) Confidential sou
Subject: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

Dear EHP Gladstone



Please see CR68365 concerning a complaint of excessive black smoke from flaring on Curtis Island.

Ecotrack entry:

sch3(1)(1)(b) Confidential source of information called in to formally lodge his objection to the release of excessive black smoke over the last two weeks from flaring on Curtis Island. *sch3(1)(1)(b) Confidential source of information* the black smoke may be causing adverse health effects across the Gladstone area *sch3(1)(1)(b) Confidential source of information*

sch3(1)(1)(b) Confidential source of information

sch3(1)(1)(b) Confidential source of information thought the flare had been operating continuously for around two weeks, was up to 60 meters in height and was causing the release of excessive black smoke.

Regards. Gary.

Gary Kane

Principal Community Response Officer

Technical Support and Community Response

Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 1300 130 372 (option 2)

Level 9, 400 George Street, Brisbane

GPO Box 2454, Brisbane, Qld, 4001

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BAKER Tony

From: Pollution Hotline
Sent: Friday, 3 July 2015 12:32 PM
To: CW ES_Gladstone
Cc: STRIDE Cherie; BAKER Tony
Subject: CR68372 - Complaint re smoke from QCLNG Curtis Island

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon Gladstone office,

Community Response recorded the following nuisance complaint, which requires referral to the relevant Compliance Centre:-

3/7/2015 at 11.58am - Received phone call from [redacted] who wishes to make a complaint regarding dark carbon smoke (burnt excess gas) from the QCLNG gas plant located on Curtis Island, Gladstone. The smoke has been bad for the past 5 days and is affecting [redacted]
[redacted]

The details have now been entered into Ecotrack under reference **CR68372**.

Regards, Geoff



Geoff Dunbar

Community Response Officer

Community Response | Regulatory Capability & Customer Service

Department of Environment and Heritage Protection

P: 1300 130 372 (option 2) E: pollutionhotline@ehp.qld.gov.au

Level 9, 400 George Street, Brisbane

GPO Box 2454, Brisbane QLD 4001

BAKER Tony

From: STRIDE Cherie
Sent: Thursday, 16 July 2015 3:21 PM
To: MAXWELL Aimee
Cc: BAKER Tony; SMEMAN Danielle
Subject: FW: CR68555 & CR68556 - release of black smoke - Curtis Island

ProfileOnSend: 1

Aimee, FYA

CR68555 – “[sch3(10)] called to say that there was currently a massive release of black smoke from Curtis Island that looked like a huge pile of tyres on fire. [sch3(10)] said there was little flame and mainly black smoke. [sch3(10)] said it had been really bad for the last half hour.”

CR68556 – “[sch3(10)](b) Confidential source of information observing a huge cloud of burned carbon coming from Curtis Island. [sch3(10)] said it was the worst he had ever seen. [sch3(10)] said it was almost all burned carbon with little flame. [sch3(10)] said he thought it was a serious matter that needed action.”



Cherie Stride

Environmental Support Officer

Coal & Central QLD Compliance | Gladstone

Department of Environment and Heritage Protection

P 07 4971 6533 | VoIP 22533

Level 2 | 20-22 Herbert St Gladstone 4680

PO Box 5065 Gladstone 4680

From: Pollution Hotline
Sent: Thursday, 16 July 2015 3:11 PM
To: CW ES_Gladstone
Subject: CR68555 & CR68556 - release of black smoke - Curtis Island

Dear EHP Gladstone

Please see CR68555 and CR68556 concerning two new complaints of the release of black smoke from Curtis Island.

Regards. Gary.

Gary Kane

Principal Community Response Officer

Technical Support and Community Response

Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 1300 130 372 (option 2)

Level 9, 400 George Street, Brisbane

GPO Box 2454, Brisbane, Qld, 4001

Running Sheet Summary

Outcome Description: Awaiting Manager to allocate to EO

Due Date:

Date Completed:

Source Ref: CR69168

Action Source Ref:

Date Commenced: 28/AUG/15

First Action: N

Officer Involved: DELA CRUZ, Myra

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Site Inspection - Level A

Inspection Type: Reactive - followup

Enforcement Measure Type:

Referral To:

Action: To investigate potential source of an odour complaint within Clinton area.

Time Spent Hours: 3

Time Spent Minutes:

Outcome: Action Required - further investigation

Outcome Description: The investigation did not identify the potential source of the odour complaint. Controlled burning was noted adjacent to rail bridge (Byellee Road) but it appeared it occurred within the last 24 hours.

Due Date:28/AUG/15

Date Completed:28/AUG/15

Source Ref: CR69168

Action Source Ref:

Date Commenced: 31/AUG/15

First Action: N

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: AM spoke to complainant about odour and what led her to believe it is from the LNG facilities. Complainant advised that it could be another source however, ssb3(1)(b) Confidential source of information ce and has only noticed issues with odour in the last 6mths. Complainant asked about chemicals in flare and was advised that EHP required an EE and that the report is available under S540 of the EP Act.

Time Spent Hours:

Time Spent Minutes:

Outcome: Action Required - further investigation

Outcome Description: Advised that further investigation would be undertaken to determine source of odour. Investigation undertaken, no source identified.

Due Date:

Date Completed:31/AUG/15

Running Sheet Summary

Complaint/Report Ref: CR68365

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
Curtis Island Industry Precinct,CURTIS ISLAND 4680		Curtis Island Industry Precinct Gladstone State Development Area CURTIS ISLAND QLD 4680

Source Ref: CR68365

Action Source Ref:

Date Commenced: 03/JUL/15

Officer Involved: LOVE, David

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Meeting

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: Complainant attended office to discuss concerns regarding flare. Advised the EE Report is available under Public Register, will likely request copy.

Time Spent Hours:

Time Spent Minutes:

Outcome: NFA

Outcome Description: Complainant to request documents under EP Act public register

Due Date:

Date Completed:03/JUL/15

Source Ref: CR68365

Action Source Ref:

Date Commenced: 03/JUL/15

Officer Involved: KANE, Gary

Responsible Office: Community Response

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To: Compliance and Investigation Unit

Action: GK sent job on to the EHP Gladstone Compliance Centre.

Time Spent Hours:

Time Spent Minutes: 15

Outcome: Action Required - further investigation

Running Sheet Summary

Outcome Description:

Due Date:

Date Completed:03/JUL/15

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Running Sheet Summary

Complaint/Report Ref: CR68549

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
[Redacted]						

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
[Redacted]		

Source Ref: CR68549

Action Source Ref:

Date Commenced: 16/JUL/15

Officer Involved: KANE, Gary

Responsible Office: Community Response

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To: Compliance and Investigation Unit

Action: GK sent job on to the EHP Gladstone Compliance Centre.

Time Spent Hours:

Time Spent Minutes: 15

Outcome: Action Required - further investigation

Outcome Description:

Due Date:

Date Completed: 16/JUL/15

First Action: Y

Source Ref: CR68549

Action Source Ref:

Date Commenced: 23/JUL/15

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: Advised [Redacted] that EHP required QCLNG to undertake an investigation into impacts from the flare. The investigation has been completed and report accepted. EHP is considering its position with regard to EA conditions and further action. The EE Report is a public register document - can view in the office or obtain a copy (possible fee).

Time Spent Hours:

First Action: N

Running Sheet Summary

Time Spent Minutes: 15

Outcome: NFA

Outcome Description: EHP to email sc68310 on how he can obtain a copy of the EE report and what fee is required.

Due Date:

Date Completed: 23/JUL/15

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Running Sheet Summary

Complaint/Report Ref: CR68309

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
sch3(10)(1)(b) Confidential source of information						

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
Curtis Island Industry Precinct,CURTIS ISLAND 4680		Curtis Island Industry Precinct Gladstone State Development Area CURTIS ISLAND QLD 4680

Source Ref: CR68309

Action Source Ref:

Date Commenced: 30/JUN/15

First Action: Y

Officer Involved: KANE, Gary

Responsible Office: Community Response

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To: Compliance and Investigation Unit

Action: GK sent job on to the EHP Gladstone Compliance Centre.

Time Spent Hours:

Time Spent Minutes: 15

Outcome: Action Required - further investigation

Outcome Description:

Due Date:

Date Completed: 30/JUN/15

Source Ref: CR68309

Action Source Ref:

Date Commenced: 23/JUL/15

First Action: N

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: Attempted to contact sch3(10)(1)(b) regarding his complaint and it appears the phone number is incorrect. Person who answered phone was sch3(10)(1)(b)

Time Spent Hours:

Time Spent Minutes:

Outcome: Other

Running Sheet Summary

Outcome Description: Unable to contact scb83101 due to issue with phone number entered/provided in ecotrack entry.

Due Date:

Date Completed: 23/JUL/15

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Running Sheet Summary

Time Spent Minutes:

Outcome: Other

Outcome Description: Other complaints also recieved, statutory action being considered.

Due Date:

Date Completed:

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Complaint/Report Details

Complaint/Report Ref:CR68550

Priority/Sensitive:N

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
[Redacted]						

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
Curtis Island Industry Precinct,CURTIS ISLAND 4680		Curtis Island Industry Precinct Gladstone State Development Area CURTIS ISLAND QLD 4680

Type: Incident

Nature: CSG/LNG : General

Received Date: 16/JUL/15

Receiving Officer: KANE, Gary

Receiving Office: Community Response

Status: Active

Origin: Public

Notification Method: Telephone call - business hours

Project Manager: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Description

Event On/From Date:Event On/From Time:Received Time: 09:55 AM

Event To Date:Event To Time:Ongoing: NPrint Related Permits:

Description

9.55am 16/07/2015 - [Redacted] called to complain of the ongoing flaring and black smoke from Curtis Island. [Redacted] said that at 6.45am this morning it was particularly bad with a huge pall of black smoke swirling over the Gladstone airshed. [Redacted] said he had read in the local newspaper that APLNG were going to implement a pollution prevention process to manage releases from their flaring, and wanted to know why EHP were not requiring the same from the current polluters. [Redacted] had also hear from community gossip that the company may also be disposing of waste refrigerant gasses by feeding them into the flare, and wanted to know if EHP was aware of this allegation.

2.20pm 16/07/2015 - [Redacted] called back to say that no one had contacted him since his complaint earlier in the day and that the smoke was currently 3x worse than it had ever been. [Redacted] demanded to know why EHP was taking no action. GK transferred [Redacted] to Tony Baker EHP.

Running Sheet Summary

Accrued Time: 0 hrs 15 mins

First Action	Date Commenced	Due Date	Action Type	Officer Involved	Outcome	Date Completed
Y	16/JUL/15		Telephone Call	KANE, Gary	Action Required - further investigation	16/JUL/15

Related Complaints/Reports

Ref	Complainant	Alleged Source	Incident Location	Received Date
[Redacted]				

Complaint/Report Details

Related Complaints/Reports				
Ref	Complainant	Alleged Source	Incident Location	Received Date
ss7.3/3	scb3(10)(1)(b) Confidential sc	UNKNOWN ALLEGED	Curtis Island Industry Precinct,CURTIS ISLAND 4680	30/JUN/15
		SOURCE	Curtis Island Industry Precinct,CURTIS ISLAND 4680	03/JUL/15
		UNKNOWN ALLEGED	Curtis Island Industry Precinct,CURTIS ISLAND 4680	03/JUL/15
		SOURCE	Curtis Island Industry Precinct,CURTIS ISLAND 4680	03/JUL/15
		UNKNOWN ALLEGED	Curtis Island Industry Precinct,CURTIS ISLAND 4680	16/JUL/15
		SOURCE	Curtis Island Industry Precinct,CURTIS ISLAND 4680	16/JUL/15
		UNKNOWN ALLEGED	Curtis Island Industry Precinct,CURTIS ISLAND 4680	

Related Compliance Activity

Ref	Type	Information Entered	Client	Activity Location
ss7.3/3				

Complaint/Report Details

ss73/3

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Re lease

Complaint/Report Details

ss7.3/3

Running Sheet Summary

Complaint/Report Ref: CR68381

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
sch3(10)(1)(b) Confidential source of information						

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
Curtis Island Industry Precinct,CURTIS ISLAND 4680		Curtis Island Industry Precinct Gladstone State Development Area CURTIS ISLAND QLD 4680

Source Ref: CR68381

Action Source Ref:

Date Commenced: 03/JUL/15

Officer Involved: KANE, Gary

Responsible Office: Community Response

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To: Compliance and Investigation Unit

Action: GK sent job on to the EHP Gladstone Compliance Centre.

Time Spent Hours:

Time Spent Minutes: 15

Outcome: Action Required - further investigation

Outcome Description:

Due Date:

Date Completed: 03/JUL/15

First Action: Y

Source Ref: CR68381

Action Source Ref:

Date Commenced: 08/JUL/15

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: sch3(10)(1) phoned to discuss his concerns around the flaring, he said it was particularly bad today and has been for the past week. sch3(10)(1) said the government is not doing anything and he is concerned sch3(10)(1)(b) Confidential

Time Spent Hours:

Time Spent Minutes:

First Action: N

Running Sheet Summary

Outcome: Action Required - further investigation

Outcome Description: AM advised that the department was investigating the matter and no additional information was able to be provided at this stage. sc63(10)(1) wants to be kept informed.

Due Date:

Date Completed:08/JUL/15

Source Ref: CR68381

Action Source Ref:

Date Commenced: 09/JUL/15

First Action: N

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: Discussed sc63(10)(1) call with Gladstone CDM around what information could be provided. Telephoned sc63(10)(1) to advise that EHP has required QCLNG to undertake an investigation into the impacts of the flaring. The investigation has been completed and is currently being considered. If harm is proven, compliance action will be taken.

Time Spent Hours:

Time Spent Minutes:

Outcome: NFA

Outcome Description: sc63(10)(1) thanked AM for the phone call and said 'he's glad that something is being done'.

Due Date:

Date Completed:09/JUL/15

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Running Sheet Summary

Complaint/Report Ref: CR68367

Complainant

Ref	Name	Address	Phone	Mobile	Fax	Email
-----	------	---------	-------	--------	-----	-------

scb3(10)(1)(b) Confidential source of information

Alleged Source

Ref	Name	Address	Phone	Mobile	Fax	Email
606111	UNKNOWN ALLEGED SOURCE	DO NOT EDIT				

Incident Location

Name	Risk Level	Address
Curtis Island Industry Precinct,CURTIS ISLAND 4680		Curtis Island Industry Precinct Gladstone State Development Area CURTIS ISLAND QLD 4680

Source Ref: CR68367

Action Source Ref:

Date Commenced: 03/JUL/15

First Action: Y

Officer Involved: KANE, Gary

Responsible Office: Community Response

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To: Compliance and Investigation Unit

Action: GK sent job on to the EHP Gladstone Compliance Centre.

Time Spent Hours:

Time Spent Minutes: 15

Outcome: Action Required - further investigation

Outcome Description:

Due Date:

Date Completed:03/JUL/15

Source Ref: CR68367

Action Source Ref:

Date Commenced: 23/JUL/15

First Action: N

Officer Involved: MAXWELL, Aimee

Responsible Office: ES - Reg Serv - Central Coast - Gladstone - EPA

Action Type: Telephone Call

Inspection Type:

Enforcement Measure Type:

Referral To:

Action: Advised scb3(10)(1)(b) that EHP required QCLNG to undertake an investigation into impacts from the flare. The investigation has been completed and report accepted. EHP is considering its position with regard to EA conditions and further action. The EE Report is a public register document - can view in the office or obtain a copy (possible fee).

Time Spent Hours:

Running Sheet Summary

Time Spent Minutes: 15

Outcome: NFA

Outcome Description: Emailed sc6830 with information on how to obtain a copy of the report and fee involved.

Due Date:

Date Completed: 23/JUL/15

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STEPHENSON Carla

From: STRIDE Cherie
Sent: Thursday, 16 July 2015 3:21 PM
To: MAXWELL Aimee
Cc: BAKER Tony; SMEMAN Danielle
Subject: FW: CR68555 & CR68556 - release of black smoke - Curtis Island

Importance: High

Categories: Complaints

Aimee, FYA

CR68555 – “[sch3(10)] called to say that there was currently a massive release of black smoke from Curtis Island that looked like a huge pile of tyres on fire. [sch3(10)] said there was little flame and mainly black smoke. [sch3(10)] said it had been really bad for the last half hour.”

CR68556 – “[sch3(10)(1)(b) Confidential source of information] observing a huge cloud of burned carbon coming from Curtis Island. [sch3(10)] said it was the worst he had ever seen. [sch3(10)] said it was almost all burned carbon with little flame. [sch3(10)] said he thought it was a serious matter that needed action.”



Cherie Stride
Environmental Support Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6533 | VoIP 22533
Level 2 | 20-22 Herbert St Gladstone 4680
PO Box 5065 Gladstone 4680

From: Pollution Hotline
Sent: Thursday, 16 July 2015 3:11 PM
To: CW ES_Gladstone
Subject: CR68555 & CR68556 - release of black smoke - Curtis Island

Dear EHP Gladstone

Please see CR68555 and CR68556 concerning two new complaints of the release of black smoke from Curtis Island.

Regards. Gary.

Gary Kane
Principal Community Response Officer
Technical Support and Community Response
Regulatory Capability and Customer Service
Department of Environment and Heritage Protection

P 1300 130 372 (option 2)
Level 9, 400 George Street, Brisbane
GPO Box 2454, Brisbane, Qld, 4001

STEPHENSON Carla

From: SMEMAN Danielle on behalf of CW ES_Gladstone
Sent: Monday, 24 August 2015 11:43 AM
To: MAXWELL Aimee
Subject: FW: CR69089 - Complaint re black smoke from gas flares on Curtis Island
Attachments: QGC Train 2 shut down

Importance: High

Hi Aimee

FYA

I have sent you photos through iCloud – taken this morning when Karin and I were out on the Quoin Is inspection, between 6:40am-9:30am



Danielle Smeman
Compliance Support Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6503 | VoIP 22503
Level 2 | 20-22 Herbert St | Gladstone 4680
PO Box 5065 | Gladstone 4680

From: BAKER Tony
Sent: Monday, 24 August 2015 11:06 AM
To: CW ES_Gladstone
Subject: RE: CR69089 - Complaint re black smoke from gas flares on Curtis Island

Allocate to Aimee.

Thanks

Tony

From: SMEMAN Danielle **On Behalf Of** CW ES_Gladstone
Sent: Monday, 24 August 2015 10:10 AM
To: BAKER Tony
Subject: FW: CR69089 - Complaint re black smoke from gas flares on Curtis Island

Hi Tony,

Complaint received this morning re the flare. Who would you like to action?

I have more photos if you need them.



Danielle Smeman
Compliance Support Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6503 | VoIP 22503
Level 2 | 20-22 Herbert St | Gladstone 4680
PO Box 5065 | Gladstone 4680

From: Pollution Hotline
Sent: Monday, 24 August 2015 10:02 AM
To: CW ES_Gladstone
Subject: CR69089 - Complaint re black smoke from gas flares on Curtis Island

Good morning Gladstone office,

Community Response recorded the following smoke complaint, which requires referral to the relevant Compliance Centre:-

24/8/2015 at 9.27am - Received telephone call from sch3(1)(1)(b) Confidential source who is making a complaint regarding the thick black smoke coming from the gas flares on Curtis Island. The flaring commenced about 6.30am this morning (24/8/2015), but the really thick black smoke started at 8.30am and is still going now. sch3(1)(1) was unsure which gas plant (s73/3 or QCLNG) was responsible for this pollution.

The above complaint details have now been entered into Ecotrack under reference **CR69089**.

Regards, Geoff



Geoff Dunbar
Community Response Officer
Community Response
Regulatory Capability & Customer Service
Department of Environment and Heritage Protection

Phone: 1300 130 372 (option 2)
Email: pollutionhotline@ehp.qld.gov.au
Level 9, 400 George Street, Brisbane
GPO Box 2454, Brisbane QLD 4001

From: [redacted] **Confidential source of information ce**
Sent: Wednesday, 12 August 2015 1:42 PM
To: MAXWELL Aimee
Subject: Re: Enquiry - LNG Plants Gladstone

Dear Aimee. Thank you for your response. It was honest and informative and I thank you for that.

The flare is just as bad as ever and seems to be constant. Today is particularly bad and flaring 100s of metres in the air accompanied by huge plumes of black smoke. This cannot be good for the environment and absolutely bad for residents of Gladstone. This would not be tolerated anywhere else.

Shell now own QCLNG. Shell may be interested in retroengineering their plant to achieve standards of visual emissions formerly adopted in their Refinery Operations in Sydney NSW where flares of this nature would not have been tolerated. In this regard Shell may be interested in retro-engineering the flare to a higher standard to perhaps that of the last Plant on Curtis Island. The EPA have an excellent opportunity to talk with Shell in this regard with a view to achieving these results.

Kind Regards

[redacted]

On Fri, Jul 24, 2015 at 1:06 PM, MAXWELL Aimee <Aimee.Maxwell@ehp.qld.gov.au> wrote:

Dear [redacted]

Thank you for your email dated 17 July 2015.

The Department of Environment and Heritage Protection (the department) sets environmental outcomes that must be achieved by approval holders rather

than prescribing design standards or mandating specific technologies (such as ground flares) that are employed by a particular industry.

Industry must be able to demonstrate through the application process that the design or technologies used will meet the environmental outcomes set out in the environmental authority.

All three plants have conditions in their environmental authorities that specify the flare performance standard and combustion efficiency when combusting gas. Smoke generation from the flare is a by-product of incomplete combustion which is an indicator that the standards set out in the approval may not be being achieved.

The flare at the QCLNG plant has been the only flare that received reports of significant plumes of black smoke being emitted. In April 2015, the department directed QCLNG Operating Company Pty Ltd to undertake an investigation into the impacts of flaring (including light and air emissions). As a result of the investigation the department may

It is the responsibility of the approval holder to assess the most efficient and effective way to achieve the environmental outcomes. When the department identifies breaches of legislation which includes breaches of approval conditions or potential for environmental harm, compliance action is taken in accordance with the department's enforcement guidelines. The guidelines can be accessed from the department's website.



Queensland
Government

Department of Environment and Heritage Protection

PO Box 5065 Gladstone 4680

Subject: Enquiry - ~~scb3(10)(1)(b)(1) Co~~

Enquiry - sch3(10)(1)(b) Confidentials

Section 1 - Enquiry

Provide your comment in the box below.*

- LNG Plants Gladstone Qld. There are 3 gas plants. The 3rd gas plant owns the technology sold to the other 2 plants. However, the first 2 gas plants use stacks which are constantly flaring. The 3rd gas plant does not have a stack so there won't be any visible flaring or smoke emissions. Why wasn't it a condition of licence to operate that the first 2 plants operate use the more sophisticated method of control. It is an absolute disgrace the people of Gladstone are unnecessarily subjected these uncontrolled flares and black smoke? s38(1)(b) Confidential source of information

seemingly collateral damage? The question that must be asked is why EPA did not insist the first 2 plants utilise the technology of the 3rd plant.

Name and location of the person you have been dealing with in the department, if applicable.

- No-one as yet.

Section 2 - Your contact details

sch3(10)(1)(b) Confidential source of information

CSV DATA

Survey version: 1.0

Date,Time,Q1[1],Q1[2],Q2[1],Q2[2],Q2[3],Q2[4]

2015-07-17,1:33pm,LNG Plants Gladstone Qld. There are 3 gas plants. The 3rd gas plants owns the technology sold to the other 2 plants. However; the first 2 gas plants use stacks which are constantly flaring. The 3rd gas plant does not have a stack so there won't be any visible flaring or smoke emissions. Why wasn't it a condition of licence to operate that the first 2 plants operate use the more sophisticated method of control. It is an absolute disgrace the people of Gladstone are unnecessarily subjected these uncontrolled flares and black smoke? sch3(10)(1)(b) Confidential source of information

sch3(10)(1)(b) Confidential source of information

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sch3(10)(1)(b) Confidential source of information

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STEPHENSON Carla

From: LOVE David
Sent: Friday, 3 July 2015 12:12 PM
To: STRIDE Cherie; BAKER Tony
Cc: SMEMAN Danielle; MAXWELL Aimee
Subject: RE: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Complaints

sc68(10)(1)(b) came in to discuss this. In some detail ...
I will add a widget to ecotrack

He will likely be sending an email requesting the EE report now it has been accepted.

David Love

Team Leader, Central Queensland Compliance, Gladstone
Environmental Services and Regulation.
Telephone 07 4971 6508
Mobile: sc64p9(3) Prejudicial
Email: David.love@ehp.qld.gov.au

Department of Environment & Heritage Protection
Level 2 20-22 Herbert Street, Gladstone QLD 4680
PO Box 5065, Gladstone QLD 4680

From: STRIDE Cherie
Sent: Friday, 3 July 2015 11:16 AM
To: BAKER Tony
Cc: SMEMAN Danielle; LOVE David; MAXWELL Aimee
Subject: FW: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

Tony, who would you like me to allocate this to?



Cherie Stride
Environmental Support Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6533 | VoIP 22533
Level 2 | 20-22 Herbert St Gladstone 4680
PO Box 5065 Gladstone 4680



From: Pollution Hotline
Sent: Friday, 3 July 2015 10:23 AM
To: CW ES_Gladstone
Cc: [redacted]
Subject: CR68365 - complaint of excessive black smoke from flaring - Curtis Island

Dear EHP Gladstone

Please see CR68365 concerning a complaint of excessive black smoke from flaring on Curtis Island.

Ecotrack entry:

[redacted] *called in to formally lodge his objection to the release of excessive black smoke over the last two weeks from flaring on Curtis Island. [redacted] the black smoke may be causing adverse health effects across the Gladstone area* [redacted]
[redacted]

[redacted] *thought the flare had been operating continuously for around two weeks, was up to 60 meters in height and was causing the release of excessive black smoke.*

Regards. Gary.

Gary Kane

Principal Community Response Officer

Technical Support and Community Response

Regulatory Capability and Customer Service

Department of Environment and Heritage Protection

P 1300 130 372 (option 2)

Level 9, 400 George Street, Brisbane

GPO Box 2454, Brisbane, Qld, 4001

STEPHENSON Carla

From: MAXWELL Aimee
Sent: Monday, 28 September 2015 3:10 PM
To: sch3(10)(1)(b) Confidential source
Subject: RE: LNG enquiry/complaint



Good afternoon sch3(10)

The department would respond to an industrial incident that may result in adverse impacts on health under the Queensland Government's emergency management arrangements. Any industrial incident that threatens community safety or health would likely result in a multi-agency response. If a wide scale incident was to occur, the Department of Agriculture and Fisheries would provide direction on any impact on plant or animals and Queensland Health would provide direction with respect to human health.

The operator of a commercial activity is responsible for ensuring that emissions do not adversely impact on air quality values. The department regulates emission levels through an operator's environmental authority. If an operator fails to comply, the department may initiate enforcement action under the *Environmental Protection Act 1994*.

The State Government operates a network of seven air quality monitoring stations across the Gladstone region to monitor contaminant levels at sensitive places such as residences. The monitoring stations provide data on the concentrations of key pollutants likely to be influencing air quality.

Based on monitoring at these sites, the department does not have any specific concerns in relation to the performance of the flares in relation to air quality objectives at this time. Further, due to the elevation of the flare and associated dispersion of the plume, emissions are not expected to appear in concentrations at ground level that would impact on the health of people and animals.

As an investigation is currently underway, the department would be interested to know if you have observed smoke sch3(10)(1)(b) Confidential or noticed anything that is linked to the operation of the flare that may assist us in our line of enquiry.

Kind regards
Aimee

Aimee Maxwell
Senior Environmental Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6512 | VoIP 22512
Level 2 | 20-22 Herbert St Gladstone 4680
PO Box 5065 Gladstone 4680

From: sch3(10)(1)(b) Confidential source of information
Sent: Wednesday, 23 September 2015 8:21 PM
To: MAXWELL Aimee
Subject: RE: LNG enquiry/complaint

Hi Aimee

Thank you for the information that you have provided, I also requested in regards to the following

If the department of environmental and heritage becomes aware of possible pollutants or emissions that breach agreed levels that could have an effect on my environment, [redacted] will they

- Notify me [redacted]
- The air is not fit to breathe for short or long term periods
- Does your department have a duty of care to health and wellbeing of people and animals that are affected by emissions that breach agreed levels by notification so that people can take action to best preserve their health and the health of their animals?. If not is there a duty of care at all and what would it be?

[redacted]

If you are unable to answer my concerns, could you please direct me to someone else in your department who can answer these concerns, and if per chance I have the wrong department who can help me, I apologize and could you please direct me in the right area.

[redacted]

Kind Regards

[redacted]

From: MAXWELL Aimee [<mailto:Aimee.Maxwell@ehp.qld.gov.au>]

Sent: 23 September, 2015 4:17 PM

To: [redacted]

Subject: LNG enquiry/complaint

Good afternoon [redacted]

Further to our telephone discussion additional information and links are below.

The petroleum and gas and mining environmental authorities register provides details about licences issued for petroleum and gas and mining related developments. Access to the register is available on the Department of Environment and Heritage Protection website. The link below will take you to the website where you can search for environmental authorities (conditions of approval) by tenure or permit number, local government area or permit holder.

<http://environment.ehp.qld.gov.au/env-authorities/>

The department maintains a network of air quality monitoring stations in the Gladstone area. The monitoring stations provide hourly air quality data on the concentrations of key pollutants likely to be influencing air quality.

Link to the air quality data: <http://www.ehp.qld.gov.au/air/data/search.php>

Additionally, as discussed under section 540 of the *Environmental Protection Act 1994* (link below) the department is required to keep a Public Register of certain documents that are available to the general public.

<http://www.legislation.qld.gov.au/LEGISLTN/CURRENT/E/EnvProtA94.pdf>



Members of the public are able to view documents (including the environmental investigation report) on the register at their local EHP office by appointment. Alternatively and subject to a fee, copies of documents can be provided via email/mail.

The Public Register fees are \$7.05 for the first five pages and \$0.71 for each additional page thereafter.

Kind regards
Aimee

Aimee Maxwell
Senior Environmental Officer
Coal & Central QLD Compliance | Gladstone

Department of Environment and Heritage Protection

P 07 4971 6512 | VoIP 22512
Level 2 | 20-22 Herbert St Gladstone 4680
PO Box 5065 Gladstone 4680

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RTI Act 2009

STEPHENSON Carla

From: STRIDE Cherie
Sent: Wednesday, 30 September 2015 9:40 AM
To: MAXWELL Aimee; SNOWDON Lisa
Subject: FW: CR69624 General Concerns

FYI/FYA



Cherie Stride
Environmental Support Officer
Coal & Central QLD Compliance | Gladstone
Department of Environment and Heritage Protection

P 07 4971 6533 | VoIP 22533
Level 2 | 20-22 Herbert St Gladstone 4680
PO Box 5065 Gladstone 4680

From: Pollution Hotline



Sent: Wednesday, 30 September 2015 9:39 AM
To: CW ES_Gladstone
Cc: STRIDE Cherie; BAKER Tony
Subject: CR69624 General Concerns

scb3(10)(1)(b) Confidential source of information was very concerned regarding the flares off Gladstone. She has concerns for the health of locals and considers that it will turn into something similar to Port Kembla (NSW) where there are cancer clusters which she believes have been attributed to the mines.

scb3(10)(1)(b) Confidential source of information believes that whoever has approved the permits is causing environmental harm.

She is not expecting a call just wanted to voice her concerns.

regards

Denise Henderson
Community Response Officer
Community Response, Regulatory Capability and Customer Service
Environmental Services and Regulation
Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane
Ph: 1300 130 372 (Option 2)
Email: Pollutionhotline@ehp.qld.gov.au

BAKER Tony

From: MAXWELL Aimee
Sent: Thursday, 13 August 2015 8:39 AM
To: BAKER Tony
Cc: LOVE David
Subject: FW: Enquiry - LNG Plants Gladstone

Follow Up Flag: Follow up
Flag Status: Completed



Hi Tony

FYI – response from scb3(10)(1)(b) C

Thanks

Aimee Maxwell

Senior Environmental Officer

Coal & Central QLD Compliance | Gladstone

Department of Environment and Heritage Protection

P 07 4971 6512 | VoIP 22512

Level 2 | 20-22 Herbert St Gladstone 4680

PO Box 5065 Gladstone 4680

From: scb3(10)(1)(b) Confidential source of information ce of 1

Sent: Wednesday, 12 August 2015 1:42 PM

To: MAXWELL Aimee

Subject: Re: Enquiry - LNG Plants Gladstone

Dear Aimee. Thank you for your response. It was honest and informative and I thank you for that.

The flare is just as bad as ever and seems to be constant. Today is particularly bad and flaring 100s of metres in the air accompanied by huge plumes of black smoke. This cannot be good for the environment and absolutely bad for residents of Gladstone. This would not be tolerated anywhere else.

Shell now own QCLNG. Shell may be interested in retroengineering their plant to achieve standards of visual emissions formerly adopted in their Refinery Operations in Sydney NSW where flares of this nature would not have been tolerated. In this regard Shell may be interested in retro-engineering the flare to a higher standard to perhaps that of the last Plant on Curtis Island. The EPA have an excellent opportunity to talk with Shell in this regard with a view to achieving these results.

Kind Regards

scb3(10)(1)(b) C

On Fri, Jul 24, 2015 at 1:06 PM, MAXWELL Aimee <Aimee.Maxwell@ehp.qld.gov.au> wrote:

Dear scb3(10)(1)(b) C

Thank you for your email dated 17 July 2015.

The Department of Environment and Heritage Protection (the department) sets environmental outcomes that must be achieved by approval holders rather

than prescribing design standards or mandating specific technologies (such as ground flares) that are employed by a particular industry.

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All three plants have conditions in their environmental authorities that specify the flare performance standard and combustion efficiency when combusting gas. Smoke generation from the flare is a by-product of incomplete combustion which is an indicator that the standards set out in the approval may not be being achieved.

The flare at the QCLNG plant has been the only flare that received reports of significant plumes of black smoke being emitted. In April 2015, the department directed QCLNG Operating Company Pty Ltd to undertake an investigation into the impacts of flaring (including light and air emissions). As a result of the investigation the department may serve further directions to address performance of the flare and impose further restrictions on the environmental approval.

It is the responsibility of the approval holder to assess the most efficient and effective way to achieve the environmental outcomes. When the department identifies breaches of legislation which includes breaches of approval conditions or potential for environmental harm, compliance action is taken in accordance with the department's enforcement guidelines. The guidelines can be accessed from the department's website.

Kind regards



Aimee Maxwell

Senior Environmental Officer

Coal & Central QLD Compliance | Gladstone

Department of Environment and Heritage Protection

P [07 4971 6512](tel:0749716512) | VoIP 22512

Level 2 | 20-22 Herbert St Gladstone 4680

PO Box 5065 Gladstone 4680

From: Anonymous respondent [<mailto:No.valid.email.address.supplied@lavml007.dmz>]
Sent: Friday, 17 July 2015 1:33 PM
To: InfoEHP
Subject: Enquiry - sch3(10)(1)(b) Confidential

Enquiry - sch3(10)(1)(b) Confidential

Section 1 - Enquiry

Provide your comment in the box below.*

- LNG Plants Gladstone Qld. There are 3 gas plants. The 3rd gas plants owns the technology sold to the other 2 plants. However, the first 2 gas plants use stacks which are constantly flaring. The 3rd gas plant does not have a stack so there won't be any visible flaring or smoke emissions. Why wasn't it a condition of licence to operate that the first 2 plants operate use the more sophisticated method of control. It is an absolute disgrace the people of Gladstone are unnecessarily subjected these uncontrolled flares and black smoke? sch3(10)(1)(b) Confidential source of information sch3(10)(1)(b) Confidential source of information Why are the people of Gladstone seemingly collateral damage? The question that must be asked is why EPA did not insist the first 2 plants utilise the technology of the 3rd plant.

Name and location of the person you have been dealing with in the department, if applicable.

- No-one as yet.

Section 2 - Your contact details

sch3(10)(1)(b) Confidential source of information

CSV DATA

Survey version: 1.0

Date,Time,Q1[1],Q1[2],Q2[1],Q2[2],Q2[3],Q2[4]

2015-07-17,1:33pm,LNG Plants Gladstone Qld. There are 3 gas plants. The 3rd gas plants owns the technology sold to the other 2 plants. However; the first 2 gas plants use stacks which are constantly flaring. The 3rd gas plant does not have a stack so there won't be any visible flaring or smoke emissions. Why wasn't it a condition of licence to operate that the first 2 plants operate use the more sophisticated method of control. It is an absolute disgrace the people of Gladstone are unnecessarily subjected these uncontrolled flares and black smoke? sch3(10)(1)(b) Confidential
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scb3(10)(1)(b) Confid Why are the people of Gladstone seemingly collateral damage? The question that must be asked is why EPA did not insist the first 2 plants utilise the technology of the 3rd plant., No-one as yet., scb3(10)(1)(b) C

scb3(10)(1)(b) Confidential source of information

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Flare photos

22 March 2015 – EHP Officer



Release

Flare photos

16 July 2015 – Public



16 July 2015 – EHP officer



Release

Flare photos

24 August 2015 – EHP officer



Release

Flare photos



Release

BAKER Tony

From: LOVE David
Sent: Wednesday, 11 March 2015 11:45 AM
To: BAKER Tony
Cc: MAXWELL Aimee
Subject: QCLNG flare explanation

Tony

Andrew Betts of QCLNG just called to offer a more detailed explanation of the recent flaring activity at the Curtis Island LNG facility.

He explained that QCLNG is undertaking their first major planned shutdown. The shutdown commenced yesterday (10th) and part of the procedure was to pump ethylene from the refrigerant system into storage tanks. The ethylene vapour remaining after this process was sent to the flare, resulting in the observed plume. A similar process will occur today as the propane refrigerant circuit is pumped out and purged.

It is anticipated that the plant will be restarted between 20th and 24th March. During the restart, there will be more flaring activity. However, it is anticipated that this will create less of a plume.

Andrew gave a commitment to notify us before the restart. He also noted that QGC at a corporate level has recognised that they need to work on local communications regarding activities at the facility.

During the shutdown, work will be done on the nitrogen rejection units which should improve their operation, resulting in less incomplete combustion and consequently less of a plume when the plant is back into operation.

David Love

Team Leader, Central Queensland Compliance, Gladstone
Environmental Services and Regulation.
Telephone 07 4971 6508
Mobile: sch4p3(3) Prejudic
Email: David.love@ehp.qld.gov.au

Department of Environment & Heritage Protection
Level 2 20-22 Herbert Street, Gladstone QLD 4680
PO Box 5065, Gladstone QLD 4680

Work Request Form – Technical Support Team

Date of request: 01/06/2015
 Requesting Officer: David Love
 Phone Number: 4971 6508
 Office/Region: Gladstone

Date Response is Required: 11/06/2015 (first statutory deadline)

Email Address for Response:
 CWES_Gladstone@ehp.qld.gov.au

Manager: Tony Baker

Manager's Phone Number: 4971 6530

Manager's Approval of Request: Yes/No

Proponent / Company / Person / Project: QCLNG

Site/Location (if relevant): PFL 11.

File Number / EDOCS Number: Number

Request Type

- ☒ Compliance
☐ High Risk Assessment (*Requires Director Approval*)
 Has director approval been given? Yes / No

Issue Type(s)

Please delete all bar relevant issues

Air
 Ecosystem
 Engineering

Support Category

Please delete all bar relevant category

Other: *Environmental investigation review*

EA Number (*if relevant*): EPPG00711513

Details of Activity/Issue: QCLNG have been issued a notice to prepare an environmental investigation (EE) into releases to air from process flares at the LNG plant on Curtis Island.

The EE report was received by the department on 28/05/15. A decision on whether to request further information is due on 11/06/15 and a decision to accept or reject the report is due 25/06/15.

Nature of assistance requested (describe):

A review of the air quality assessment component of the EE report in response to items 1, 2 and 3 in Part B of the EE notice and advice on:

- Does the report meet the requirements of the EE Notice?
- Is further information required to meet the intent of the EE notice?
- Should the report be accepted as meeting the requirements of the EE notice or rejected?

The relevant edocs files are currently being created. Documents were emailed to Dr Ralph Riese during preliminary discussions about this request.

Note: Please attach relevant files to request or state EDOCS items number. Every effort will be made to accommodate requests.



Precedence is given to statutory timeframes and environmental issues of an urgent nature and some negotiation of timeframes may be required in circumstances of high workloads.

Please return completed forms to: technicalsupport@ehp.qld.gov.au

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BAKER Tony

From: CAMPIN Dave
Sent: Wednesday, 2 September 2015 4:16 PM
To: BAKER Tony; VENZ Mark
Subject: QCLNG flare

Follow Up Flag: Follow up
Flag Status: Completed

Folks,

I am looking into the design details of the QCLNG flare as there would appear to be some shortfalls with the "as built".

I am also looking into the Cheniere Port Arthut LNG plant given the common background (Betchtel did both projects at the same time), in particular the permits and operating constraints.

Sent from my iPad
Dave Campin
Queensland International Fellow
Principal Technical Specialist
Department of Environment and Heritage Protection

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RTI Act 2009



BAKER Tony

From: Shoena Messner <Shoena.Messner@justice.qld.gov.au>
Sent: Monday, 30 March 2015 11:31 AM
To: BAKER Tony
Cc: Olivia M. King; Allan Clarke
Subject: QCLNG

Follow Up Flag: Follow up
Flag Status: Completed

Tony,

Thanks for the update last Monday. Would you please let me know when you issue the statutory notices so I can brief accordingly?

WHSQ is now investigating three incidents at QCLNG, and have asked to company to formally reply regarding a series of process safety incidents on site.

WHSQ key local contacts include:

Allan Clarke – Industry Liaison Manager, Rockhampton 0749384745

Olivia King – Senior Safety Advisor Major Hazards, Gladstone 0749712355, sch4p9(3) Prejudic

Regards,

Shoena Messner (CPEng, RPEQ)

Director, Hazardous Industries and Chemicals Branch

Office of Fair and Safe Work Queensland

Department of Justice and Attorney General

L2 Citilink Business centre

153 Campbell St

Bowen Hills, QLD

Ph (07) 38747580

Mob sch4p9(3) Prejudic

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BAKER Tony

From: RIESE Ralph
Sent: Thursday, 12 March 2015 1:32 PM
To: MAXWELL Aimee; LOVE David; BAKER Tony
Subject: RE: QCLNG facility, Curtis Island - Flaring activities (EE)

Aimee: some comments for this afternoon's meeting.

EE Grounds

The circumstances surrounding the commissioning of the LNG trains – and particularly the flaring of gases other than methane during the commissioning period – were not identified as an issue at the EIS stage. No information relating to a situation where visible emissions to air would be generated by flaring non-methane commissioning gases for months at a time was provided in the EIS. Potential impacts from such emissions were not assessed. If the proponent was aware that such emissions were likely, it is reasonable to expect that they would have been characterised and quantified, and their impacts assessed – as is required by the EIS terms of reference. As they weren't, it is now unreasonable to regard the situation as common industry practice. It is also unreasonable for the circumstances to be repeated while Trains 2 and 3 are commissioned. (Note that this issue was not addressed for the Santos or APLNG LNG EISs – we could face a situation that they expect long commissioning periods too.)

Visible flare emissions associated with Train 1 commissioning have been reported since August 2014. These look to be the result of adding non-methane gases including nitrogen (either clean or contaminated), ethylene, and propane to the flare. Smoke from the flare indicates that the gases are not being combusted properly, which in turn suggests that the flare is not being operated properly. The following EA conditions (EPPG00711513 issued 26/02/2015) can be considered when drafting grounds/requirements for an EE.

Page 6, Condition (A3) c) - "operate such measures, plant and equipment in a proper and efficient manner". The smoke from the flare indicates that the flare is not being operated in a proper and efficient manner.

Page 6-7, Condition (A10) a) v) - is the potential for adverse impacts from non-normal flaring activities described in the EM Plan?; (A10) b) – what commitments are stated in relation to BPEM for the flare under non-normal conditions?; (A10) e) iv) – what contingency plans/corrective actions are to be implemented for non-routine situations to deal with foreseeable risks? I could not find mention of any such commitments in the EM Plan (Revision A, April 2010 provide by Gas & Petroleum). Under emission conditions shown in Dave's photograph, a simple change in wind direction could see considerable ground-level fumigation of the Gladstone Port and nearby residential and commercial areas – in other words, potential for environmental nuisance, and harm. Can the conditions resulting in visible emissions be managed if prevailing winds are likely to bring the emissions towards Gladstone?

Page 7, Condition (A12) – as for (10) e) iv) above.

Page 9, Condition (B2) – "must not cause an environmental nuisance at any nuisance sensitive place.." Community complaint(s).

Page 12, Condition (B11) – "... VOC removal efficiency of 98% under varied gas flow rate and meteorological conditions...". The condition is not limited to normal operating conditions. The flare is not meeting the removal efficiency requirement.

Page 12, Condition (B14) – "Visible smoke and particulate emissions must not be permitted for more than five minutes in any two hour period during normal operating conditions, other than during LNG train start-up." The visible smoke and particulate matter observed since August 2014 have not met the requirement as "LNG train start-up" is taken to be start-up following maintenance shut-downs – not to be confused with LNG train commissioning.



Page 24, Condition (I1) a) – “develop and implement a monitoring program...”. Has the program been developed/implemented? How has the flare destruction efficiency requirement been addressed in the program?

Page 27, Appx 1 – definitions: “normal operating” and “non-routine” conditions are not defined. This brings the requirements of Conditions (A1) and (A2) to mind.

EE requirements

The requirements need to identify why the flare is operating below the required VOC destruction efficiency, and provide a mechanism to bring the flare into proper operation. It could also be used to prepare an air quality assessment to determine the potential for impacts to air.

Dr Ralph Riese

Team Leader, Technical Support | Impact Assessment and Operational Support Branch

Environmental Services and Regulation Division

Department of Environment and Heritage Protection

Level 9 | 400 George Street | Brisbane

Tel 07 3330 5706

<http://www.ehp.qld.gov.au>



From: MAXWELL Aimee

Sent: Wednesday, 11 March 2015 4:32 PM

To: Technical Support EHP

Cc: RIESE Ralph

Subject: QCLNG facility, Curtis Island - Flaring activities (EE)

Good afternoon

Please see attached Tech support work request form.

Kind regards

Aimee

Aimee Maxwell

Senior Environmental Officer | Central Queensland Compliance | Gladstone

Environmental Services & Regulation

Department of Environment & Heritage Protection

Level 2 | 20-22 Herbert Street | Gladstone QLD 4680

PO Box 5065 | Gladstone QLD 4680

Tel 07 4971 6512 | **VoIP** 22512

www.ehp.qld.gov.au



BAKER Tony

From: BAKER Tony
Sent: Monday, 19 October 2015 4:49 PM
To: MarkH@gladstonerc.qld.gov.au
Cc: CARLOS Reuben
Subject: Fwd: Key points from meeting with EHP Officers re LNG Flaring

Mark,

I am responding on behalf of Reuben in relation to the draft release below. I would like to thank you for the opportunity to comment ahead of release. I have only made one correction, to Dr Wainwrights's title, which is included in the text below.

If you have any further question please let me know.

Regards

Tony Baker
Compliance Delivery Manager - Gladstone

From: Mark Holmes <MarkH@gladstonerc.qld.gov.au>
Date: 19 October 2015 4:20:29 pm AEST
To: "'reuben.carlos@ehp.qld.gov.au"
<reuben.carlos@ehp.qld.gov.au>
Subject: Key points from meeting with EHP Officers re LNG Flaring

Reuben,

Once again thanks for taking the time to brief Council this morning on the progress re investigations into the flaring activities of the LNG operators on Curtis Island.

We have made some notes below, and am happy to amend any sections that you feel uncomfortable with, or add in anything that we may have missed:

- Gladstone Regional Council's Councillors were presented with an overview of the review of the LNG flaring at Curtis Island and air emissions in the region (wider region generally and in particular Curtis Island) today by representatives from Department of Environment Heritage Protection (EHP), which is the lead agency for this type of activity;
- EHP advised that it will continue to actively monitor and regulate LNG flaring activity on Curtis Island, and has given

assurances to keep Council and the community fully informed.

- EHP advised it is investigating a number of complaints from the community with respect to flaring activities that have been undertaken to date. It is understood that these investigations may lead to future enforcement action being taken on any operators that have been found to be operating flares and have breached any applicable environmental legislation during their operation.
- There was a presentation by the Director for Air Quality Sciences from The Department of Science Information Technology and innovation about the ongoing monitoring, and how these stations track the air quality of mainland industries as well as the LNG facilities on Curtis Island. The results presented showed the air quality (as monitored by the air monitoring network) is "good" to "very good". However, it was noted that the one indicator of air quality, the "visibility reducing particles", exceeds the national standard intermittently, but these exceedances have been examined and can generally be traced to other environmental factors of the time, such as bushfire activity.
- It was noted that options regarding the extension of the Air Monitoring Network are being considered, but these options have not yet been finalised
- Further to this, the air quality stations operated by the EHP can be viewed at any time at:
<http://www.qld.gov.au/environment/pollution/monitoring/air-monitoring/gladstone/>
- The EHP has a hotline 1300 130 372 for people who feel concerned about flaring operations.

If you have any questions or need to contact me Reuben my phone number is sch4p9(3) Preju or as per below, we would like to get something out today but will not release anything until we have feedback from yourself.

Regards and thanks

Mark Holmes

Chief Financial Officer



PO Box 29 Gladstone Qld 4680

Phone 07 4976 6919 | Fax 07 4975 8741

Email markh@gladstonerc.qld.gov.au | Website: www.gladstone.qld.gov.au

BAKER Tony

From: BAKER Tony
Sent: Monday, 19 October 2015 3:47 PM
To: Leisa Dowling
Subject: Re: Today

Leisa,

Thank you for meeting with us.

The names are as follows;

Andrew Langford - Manager Assessment - petroleum and gas

Clancy Mackaway - Manager Compliance - petroleum and gas

Dr David Wainwright - Director - Air Quality Sciences - Department of Science, Information Technology and Innovation.

Reuben Carlos - Executive Director- Coal and Central Queensland Compliance

If you require any further information please contact me on 49716530.

Regards

Tony Baker
Compliance Delivery Manager - Gladstone

Sent from my iPhone

On 19 Oct 2015, at 1:14 pm, Leisa Dowling <LeisaD@gladstonerc.qld.gov.au> wrote:

Hi Tony

Thanks very much for organising the presentation today. It was good to put a face to the name and to hear from the experts on the flaring issues. The Mayor is preparing a media release and has asked for the names and titles of your colleagues. Could you please provide these details this afternoon if possible?

Thanks again.

Leisa

Leisa Dowling

Director - Planning and Environment

<image001.jpg>

PO Box 29 Gladstone Qld 4680

Phone 07 4977 6532| Fax 07 4975 8500

Email leisad@gladstonerc.qld.gov.au | Website: www.gladstone.qld.gov.au



Curtis Island – LNG plants

Introductions

David Wainwright Director, Air Quality Sciences
Department of Science Information Technology and Innovation

Tony Baker Compliance Delivery Manager, Central Qld Compliance
Department of Environment and Heritage Protection

Andrew Langford Manager (Assessment), Petroleum and Gas
Department of Environment and Heritage Protection

Clancy Mackaway Manager (Compliance), Petroleum and Gas
Department of Environment and Heritage Protection



Release

Overview

Department of Science Information Technology and Innovation

- Impacts (Environment/Health) of smoke emissions
- Air Quality Monitoring Network

Department of Environment and Heritage Protection

- Flare Operation and Compliance Actions
- Environmental Authorities
- Enforcement



Release

Department of Science Information Technology and Innovation

Impacts (Environment/Health) of Smoke Emissions
Air Quality Monitoring Network



Release

Department of Environment and Heritage Protection

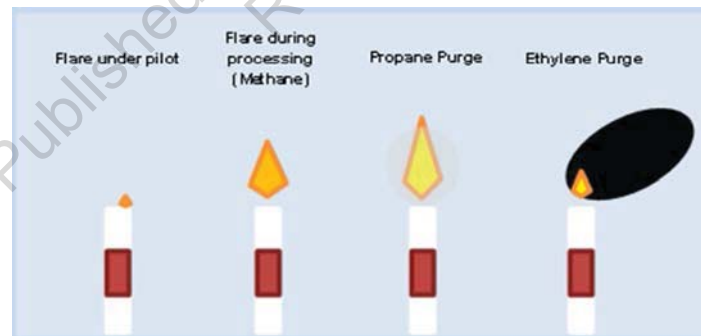
Flare Operation and Compliance Actions
Environmental Authorities
Enforcement



Release

Flare Operation

- All three plants operate both marine and process flares.
- GLNG and QCLNG both operate “stack” type marine and process flares whilst APLNG operate an integrated “ground” flare.
- QCLNG and GLNG are the most advanced in terms of the commissioning phase of the development.
- Flares are designed to burn the highly flammable gasses produced or used in the production of LNG to eliminate the risk of explosion.





Smoke Production



- Observations to date show that during gas production, methane gas produced is clean burning and produces very little visible smoke.
- The majority of smoke events from both GLNG and QCLNG's flares have been related to purging of ethylene and propane as a result of commissioning, or incidents that have occurred during construction.
- Smoke is produced as a result of partial combustion of flare feed gas.
- It is expected that smoke will be emitted from the flares from time to time as a result of changes to combustion at the flame tip.

Compliance Direction

- EHP directed QGC (QCLNG) to undertake an environmental investigation into flare impacts in April 2015.
- The investigation report provided by QGC did not provide any conclusions that indicate that emissions have compromised air quality values.
- As a result of the findings, EHP commenced an investigation into environmental nuisance to determine whether the operation of stack flares in the manner observed are adversely impacting on the aesthetics of locality.
- The existing industrial landscape of Gladstone combined with the subjective nature of nuisance has made it challenging to establish a baseline of what is acceptable in terms of visual amenity.



Release

Overview – EA conditions

- All proponents have current EA conditions.
- The EA flaring conditions and definitions are identical to those which can be found in their respective Liquefied Natural Gas Environmental Impact Statement, Coordinator Generals reports.
- Current flaring conditions authorise particulate emissions to be generated during LNG train 'start-up'.
- Depending on refrigerant volumes, staged commissioning or depressurisation volumes emissions during flaring events could exceed Schedule 1 – Air quality objectives of the Environmental Protection (Air) Policy 2008.



Released

EA conditions - old, amended and new

Old conditions	New Conditions	Intent of change
a concentration of particulate matter with an aerodynamic diameter of less than 10 micrometre (μm) (PM10) suspended in the atmosphere of 50 micrograms per cubic metre (with five one day exceedances allowed in any one year period); and over a 24 hour averaging time, at a dust sensitive place downwind of the licensed place, when monitored in accordance with AS 3580.9.6	a concentration of particulate matter with an aerodynamic diameter of less than 2.5 micrometres (PM2.5) suspended in the atmosphere of 25 micrograms per cubic metre over a 24-hour averaging time , at a dust sensitive place downwind of the licensed place, when monitored in accordance with the most recent version of AS/NZS3580.9.10	The intent of the proposed amendment is to restrict a finer resolution of particulate matter (PM2.5) to be emitted from the LNG plant in any 24 hour.

Old conditions	New Conditions	Intent of change
<p>B11) The flare must be equipped with a continuously burning pilot or other automatic ignition system that assures gas ignition and provides immediate notification to appropriate personnel when the ignition system ceases to function.</p> <p>(B12) The flare must be designed to handle large fluctuations in both the volume and the chemical content of gases.</p> <p>(B13) The flare must be equipped with a flare tip designed to provide good mixing with air, flame stability and achieve a minimum Volatile Organic Compound (VOC) removal efficiency of 98% under varied gas flow rate and meteorological conditions. and meet the best practice design standards (e.g. NSW EPA: Protection of the Environmental Operations (Clean Air) Amendment (Industrial and Commercial Activities) Regulation 2005, or the US EPA Code of Federal Regulations: 40 CFR 60.18 and 40 CFR 63.11).</p>	<p>Replaces B11 to B13</p> <p>(B10) The flare must be equipped with a flare tip designed in accordance with American Petroleum Institute (API) Standard 521; and a continuously burning pilot.</p>	<p>EHP can evaluate compliance with the standard. The conditions ensures flame stability and a minimum of 98% Volatile Organic Compound (VOC) removal efficiency under varied gas flow rate and meteorological conditions.</p>

Old conditions	New Conditions	Intent of change
(B14) Visible smoke and particulate emissions must not be permitted for more than five minutes in any two hour period, other than during LNG train start-up.	(B11) During a flaring event, visible smoke and particulate emissions must not be emitted for more than five minutes in any two hour period while the plant is returned to normal operating conditions as specified in API Standard 537, other than during LNG train commissioning.	The proposed amendment changes the meaning of the condition from “permitted” to “emitted” which is the intent of the allowance of a flaring event emitting smoke while the plant’s operations are brought back into normal operating conditions. This ensures that the condition isn’t misconstrued as a provision which allows the operation of the flaring system in a manner other than to bring the plant back to normal operating conditions after the commissioning phase of a train (which is subject to multiple flaring events as plant equipment comes online).

Old conditions	New Conditions	Intent of change
Nil	(B12) The holder of this authority must undertake monitoring in accordance with Schedule B, Table 3 – Monitoring of point source emissions to air.	The proposed new condition ensures that during a flaring event, a visual recording, temperature, vent gas flow rate and vent gas composition are monitored to allow for post flaring emittance speciation and an understanding of its duration at the wet and dry gas process flare. (“CEMS” means continuous emissions monitoring system).

Table 3 – Monitoring of point source emissions to air					
<u>Emission point reference</u>	<u>Parameter</u>	<u>Units</u>	<u>Frequency</u>	<u>Emission limits per stack</u>	<u>Method</u>
Wet and Dry Gas Process Flares	Visual recording	seconds	Continuously during a flaring event	N/A	Digital video recorder
	Temperature	°C	Continuously during a flaring event	N/A	CEMS
	Vent gas flow rate	m/s	Continuously during a flaring event	N/A	CEMS
	Vent gas composition	Multiple	Continuously during a flaring event	N/A	CEMS

Old conditions	New Conditions	Intent of change
Nil	(K6) The holder of this authority must notify the administering authority within 24 hours after commissioning. (K7) The holder of this authority must notify the administering authority 24 hours prior to a planned flaring event or within 24 hours of an unplanned flaring event.	The proposed new conditions ensure that commissioning of a train is documented and that an operator notifies the department during planned and unplanned flaring events.

Enforcement Actions

- Consideration to EHP's enforcement guidelines and regulatory strategy
- Range of enforcement options
- Application of objectives of legislation, impact, and culpability to offence
- Enforcement action decision



Questions and Feedback

Published on EHP Disclosure Log
RTI Act 2009



Release

Media release

22 October 2015

QGC fined over LNG flare smoke

A leading CSG company has been issued a Penalty Infringement Notice of \$8538 for unlawfully causing an environmental nuisance at its Curtis Island LNG plant near Gladstone.

QGC has been issued with the Penalty Infringement Notice following EHP's investigation into a release of black smoke on 10 March 2015 from a flare on Curtis Island at Gladstone. Subsequent black smoke events are still being investigated.

Gas flares are designed to provide a safe means of dealing with gas that cannot be used in the process and this is authorised under conditions in QGC's Environmental Authority (EA), which the company holds.

The State Government operates a network of seven air quality monitoring stations across the Gladstone region to monitor contaminant levels at sensitive places such as residences, and measurements during the black smoke events have not exceeded the air quality standard.

Therefore, the department does not have any environmental or health concerns based on monitoring results to date. Live data is available to the public at ehp.qld.gov.au/air/data/search.

Any member of the community concerned about flares are encouraged to contact the department's pollution hotline on 1300 130 372 or visit <https://www.ehp.qld.gov.au/air/data/search.php> to view live air monitoring data.

ENDS

For further media enquiries contact Media Services on (07) 3339 5831 or email media@ehp.qld.gov.au

Release



Queensland
Government

BAKER Tony

From: Emma Catlin <EmmaC@gladstonerc.qld.gov.au>
Sent: Thursday, 1 October 2015 4:50 PM
To: BAKER Tony
Subject: GRC Response Letter

Dear Tony,

I am writing to you in response to your letter dated the 24th September 2015 regarding the fact that Department of Environment Heritage Protection (the department) are seeking confirmation that Gladstone Regional Council (GRC) do not intend on pursuing action in relation to smoke emission from the LNG flares on Curtis Island.

At present no complaints have been received by Council regarding the flare, so I am unable to say conclusively if Council would or would not pursue the matter. However, I can confirm that, previously when Council has received complaints relating to industry and companies, whose Environmental Relevant Activities are regulated by yourselves, Council has either relayed the complaint to your Department or instructed the individual making the complaint to contact the Department of Environmental Heritage and have not pursued any action under Section 440 of the Environmental Protection Act 1994.

While Local Governments do have devolved powers under Section 440 of the Environmental Protection Act 1994, including powers to regulate smoke nuisance, for companies involved in industry such as the one your enquiry relates to, Local Government would consider any potential smoke nuisance to be more enforceable as a breach of the relevant business's ERA Licence and would therefore not think it appropriate to undertake enforcement action against this company without first having relayed the complaint or complainant to yourselves, as the regulating body for the licence. Having reviewed the conditions of the Permit for the LNG Project (Permit Number EPPG00712213), there are already specific conditions in this permit relating to the flare, including: B16: Visible smoke and particulate emissions must not be permitted for more than five minutes in any two hour period during normal operating conditions.

If conditions such as this are already incorporated into the companies licence, there would seem to be little need or benefit for Local Government to undertake additional enforcement action against the company.

Council would support the Departments request for further legal advice to clarify the devolution of powers under section 106 of the Environmental Protection Regulation 2008 and looks forward to being supplied further information from the Department regarding this advice.

Please do not hesitate to contact me if you wish to discuss this further. However, can I please request that any written correspondence from yourself or your Department be sent to info@gladstonerc.qld.gov.au

Regards

Emma Catlin
Manager Regulatory Services



PO Box 29 Gladstone QLD 4680
Phone: 4976 6959 | Fax: 4976 6959 Mobile: scb4p3(3) Prejud
Email: EmmaC@gladstonerc.qld.gov.au | Website: www.gladstone.qld.gov.au

Media release

22 October 2015

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Any member of the community concerned about flares are encouraged to contact the department's pollution hotline on 1300 130 372 or visit <https://www.ehp.qld.gov.au/air/data/search.php> to view live air monitoring data.

ENDS

For further media enquiries contact Media Services on (07) 3339 5831 or email media@ehp.qld.gov.au

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