

Department of Environment and Heritage Protection
GENERAL BRIEFING NOTE

Approved	Not Approved	Noted
Further information required		
Signed.....		
Dated / /		

TO: **Andrew Connor, Executive Director, Southern Region**
 Anne Lenz, Executive Director, Energy Resources and Enforcement

SUBJECT: EHP response to QLD Health Report: Coal seam gas in the Tara region, March 2013

RECOMMENDATION

- It is recommended that the Executive Directors **agree** that the proposed position be presented the EHP Senior Management Team for endorsement

BACKGROUND/KEY ISSUES

- QLD Health has completed a review of available information on health complaints and environmental monitoring relating to the developing gasfields around the Tara / Wieambilla residential estates, outside Chinchilla.
- The key fields are those related to QGC's "Kenya" (Walloons) project, although ALPNG (Origin) is also developing fields in the area.
- The key findings from the QLD Health report for EHP are that:
 - EHP establish an ambient air monitoring programme
 - EHP consider low frequency noise / vibration assessment on an as needs basis.
- SMT has requested that the Petroleum and Gas Working Group consider the department's position in relation the QLD Health report recommendations.

Proposed Position

Air Quality

- The recommendations listed as being EHP's responsibility has components which fall within responsibility of QLD Health and Department of Science, Information, Technology, Innovation and the Arts (DSITIA).
- EHP to provide a lead agency role and involve QLD Health and DSITIA to respond to the issues raised as EHP responsibility in the QLD Health report.
- Qld Health will provide assistance in the design of the project and play a role in interpreting the data collected relative to human health.
- DSITIA will provide assistance in the design of the project, data collection and dissemination
- EHP (in addition to lead agency) will use the information to inform the regulation of Environmental Authorities under the Environmental Protection Act.
- EHP will consider as a model the *Clean and Healthy Air for Gladstone* project. This is considered a suitable process by Queensland Health.
- The Petroleum and Gas Working Group will scope a strategic air quality assessment which will include:
 - identification and collation of air quality modelling and ambient air monitoring data conducted by CSG proponents through the project approval process for relevant projects proposed by QGC and APLNG.
 - Identification and collation of existing air emissions data and ambient air quality monitoring undertaken since project approval.
 - Engage with QHealth and DSITIA to coordinate assessment of extant data, and identify critical gaps in data.
- In view of results from the initial data assessment EHP will coordinate a scoping of further ambient air quality monitoring.

Author Name :David Darvall Position:Manager Tel No 49-Sch4 - Mobile Date: 30/4/13	Cleared by Name: Position: Tel No:	Cleared by Name: Position: Tel No:	Recommended: Name: Position: Tel No: Date:
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- It is proposed the Petroleum and Gas Working Group will coordinate development of an air monitoring plan with DSITIA and QLD Health.
- EHP, DSITIA and QLD Health will engage in review and publishing results on the EHP and QLD Health website.
- Costs and resourcing has not been fully resolved, however it is envisaged that EHP will fund DSITIA's expenses associated with data collection and monitoring from the VK funding source, QLD Health support will be supplied as 'in kind' and EHP will provide services within existing budget.
- Within EHP, the Petroleum and Gas Working group will provide lead however Southern Region will play a significant role because the project areas are within Southern Region.
- Officer level contact with QGC suggests that QGC would in principal be receptive to an approach to contribute some funding to a monitoring proposal. It is recommended that QGC and potentially Origin be approached formally if/when costings for further air quality monitoring are available.

Noise

- EHP will consider the need for further noise monitoring at or near sensitive receptors who have previously complained of noise in the Tara estates. The EHP Petroleum Working Group will be tasked with reviewing the noise assessment conducted to date and in concert with the DNRM CSG Compliance Unit assessing the need for further monitoring.
- Should a need be identified EHP Petroleum and Gas working group will be tasked with developing a noise monitoring plan based on noise complaints to date.
- EHP may seek to fund an independent noise monitoring consultant to undertake a noise monitoring programme as identified by the working group.
- As the noise complaints appear to relate particularly to QGC's Kenya operation, QGC will be approached in relation to potential part funding of an independent assessment.

COMMENTS

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Author Name :David Darvall Position:Manager Tel No 49-Sch4 - Mobil Date: 30/4/13 15-185	Cleared by Name: Position: Tel No: <hr/> Name: Position: Tel No:	Cleared by Name: Position: Tel No: <hr/> Name: Position: Tel No:	Recommended: Name: Position: Tel No: Date: Page 2 of 8
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**Department of Environment and Heritage Protection
DDG ESR BRIEFING NOTE**

SUBJECT: Review of air emission data relating to CSG activities in proximity to Wiembilla estates as a response to Queensland Department of Health CSG report recommendations.

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RECOMMENDATION Action Required by: ?

1. It is recommended the Deputy Director-General:
 - **endorse** the attached air monitoring and modelling data review related to CSG activities proximal to Wiembilla estate.
 - **agree** that the review be sent to Queensland Department of Health (DoH) to address actions in the DoH's 'Draft Action Plan in response to Recommendations arising from the DoH Coal Seam Gas Report.'

BACKGROUND

2. DoH published a report 'Coal seam gas in the Tara region: Summary risk assessment of health complaints and environmental monitoring data' in March 2013.
3. The report made several recommendations one of which was for the Department of Environment and Heritage Protection (DEHP) to establish a strategic ambient air monitoring program to monitor overall CSG emissions and the exposure of local communities to those emissions.
4. The report suggested that the program could be based on consolidation of existing air monitoring undertaken by DEHP and industry, with supplementation where insufficient data exists.
5. An action plan was drafted 23 July 2013 in response to the recommendations arising from the DoH report.
6. DEHP responded to the recommendations by agreeing to establish a coordinated approach to reviewing air monitoring information from CSG developments in Queensland with support from the DoH, Gas Fields Commission (GFC) and the Department of Science, Information Technology, Innovation and the Arts (DoSITIA).
7. The tasks required to be completed to address this approach were included in the draft action plan:
 - a. Collate and review existing air monitoring and modelling data relating to activities immediately proximal to Wiembilla estates, specifically QGC Kenya and APLNG Talinga project areas, available from government agencies and industry sources to identify if gaps exist in the available data (Task a).
 - b. Evaluate the need for a plan to address any gaps identified and consider the need for additional strategic monitoring of ambient air quality or air modelling (Task b).
 - c. Consider funding options, including industry funded solutions, to implement the plan should the evaluation recommend additional air monitoring (Task c).
 - d. Provide air monitoring and modelling results to DoH for undertaking health risk assessments (Task d).
8. The Director-General has been invited to a meeting with DoH (?) on the 20th February 2014 to update the status of the DEHP response to DoH's recommendations.

ISSUES

9. Energy Assessment Unit (EAU) have completed tasks a and b in the draft action plan.
10. EAU requested all air emission data from APLNG and QGC which is required to be collected under the respective environmental authorities (EAs) to address Task a.
11. The review of this air emission data demonstrated that EHP does not currently have access to air monitoring data for either the Talinga or Kenya project areas to allow for comparison to the air quality objectives set out EPP (Air) to protect environmental values (including health and wellbeing) due to the following information gaps:
 - a. Potential non-compliances by industry leading to monitoring not being undertaken; and
 - b. Limitations in EA conditions relating to the requirements for monitoring to enable comparisons with the air quality objectives set out in EPP (Air).
12. However a report as provided by APLNG on an ambient air quality undertaken following commissioning of the Talinga Gas Processing Facility which demonstrated that NO₂ and CO were below EPP (Air) objectives.
13. EAU also requested air quality data for the Wiembilla estate region from the Gas Fields Commission, DoH, DoSITIA, and Southern Region, DEHP (SR).
14. SR provided a DoSITIA report on volatile organic compounds (VOCs) in the Wieambilla Estate in which VOCs were detected in ambient air; however the levels detected were below relevant guidelines and criteria used to assess the potential health effects from VOC's.
15. As such based on the existing information EHP considers that a regular air monitoring program is not required however a strategic air monitoring undertaken every XX years is recommended.

CONSULTATION

16. Consultation has taken place with Southern Region, DEHP in drafting the review.

ATTACHMENTS

Attachment 1. Queensland Health – Tara – Air Emission Data Collation

Author Name: Mark Venz Position: Director, EAU Tel No: 07 3330 5534 Date Drafted: 11 February 2014	Branch Endorsement Name: Anne Lenz Position: ED, ERE Tel No: 07 3330 5626 Date Endorsed:	Division Endorsement Name: Dean Ellwood Position: DDG, ESR Tel No: 07 3330 5628 Signed Date/...../.....
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**Department of Environment and Heritage Protection
DIRECTOR-GENERAL BRIEFING NOTE**

SUBJECT: RESPONSE TO QUEENSLAND DEPARTMENT OF HEALTH CSG REPORT RECOMMENDATIONS

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RECOMMENDATION *Action Required by:* There is no specific timeframe required.

1. It is recommended the Director-General:
 - **note** the attached air and noise monitoring and modelling data reviews related to Coal Seam Gas (CSG) activities proximal to Wieambilla estate.
 - **note** the Department of Health (DoH) is seeking a lead agency to coordinate responses to its 'Draft Action Plan in response to Recommendations arising from the DoH Coal Seam Gas Report.'
 - **note** that should DoH not coordinate implementation of its own plan, that the CSG Compliance Unit within the Department of Natural Resources and Mines has a key role in coordinating whole of government responses to CSG issues.

BACKGROUND

2. Residents in the Tara area have reported health effects they say are a result of CSG activities in the area and these complaints have been widely reported in the media.
3. DoH published a report 'Coal seam gas in the Tara region: Summary risk assessment of health complaints and environmental monitoring data' in March 2013.
4. The DoH report made recommendations for the Department of Environment and Heritage Protection (EHP) to follow up in relation to air quality monitoring and modelling low frequency noise management.
5. The follow up actions were defined in the Draft Coal Seam Gas Report Action Plan sent to the Director-General of EHP in September 2013 (CTS21868). This plan did not identify reporting roles.
6. The Director-General has been invited to a meeting organised by DoH on the 20th February 2014 to identify which agency will be responsible for coordinating reporting to Cabinet on the status of the Draft Action Plan.

ISSUES

7. EHP was not consulted about the recommendations in which it was named as a responsible agency in the initial DoH report.
8. Accepting the need for government to respond to the DoH report, EHP has reviewed and evaluated existing air and noise monitoring and modelling data relating to CSG near Wieambilla estates and has found no cause to expand on current levels of monitoring in the area.
9. This is also supported by other monitoring and reporting undertaken by industry in another CSG project area which demonstrated that nitrogen dioxide and carbon monoxide emissions associated with project infrastructure have no potential to give rise to ground level exceedances of ambient air quality criteria as proscribed in the EPP (Air). ... (Santos example if found).
10. EHP requires CSG companies to monitor nitrogen dioxide and carbon monoxide at plant emission points as these are the major by-products of burning CSG.
11. EHP is also responsive to local community concerns and continues to use a variety of sampling technologies to test for a broad range of potential air contaminants, beyond those reasonably expected to occur from the authorised activities. Results to date have all been well within relevant air quality guidelines.
12. Some gaps have been identified in the provision of data from industry to EHP as required by Environmental Authorities and these are currently being addressed through EHP's compliance activities.
13. In relation to noise, an EHP noise specialist assessed existing complaint registers, collated and reviewed existing noise and vibration data, and evaluated the need for further monitoring. No substantial compliance issues were identified and the resulting recommendation was that no further investigation of the existing noise complaints is necessary.
14. Compliance checks with existing Environmental Authorities will continue in accordance with EHP's Annual Compliance Programs.

RISKS

15. There may be concern from the community that EHP has not commenced a broader air monitoring program; however there is no evidence to suggest that monitoring above and beyond that which has and is occurring is warranted.

CONSULTATION

16. Gas Fields Commission, DoH and DoSITIA have been contacted to determine if additional air monitoring data was available.

Author Name: Mark Venz Position: Director, Energy Assessment Tel No: 336305534 Date Drafted: 12/2/2014	Branch Endorsement Name: Andrew Connor Position: Executive Director, Southern Region Tel No: 3330 6335 Date Endorsed: [Insert date]	DDG Endorsement Name: Dean Ellwood Position: Deputy Director-General Tel No: 3330 5628 Signed Date/...../....
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