19.1 Introduction

This chapter details the Draft Statement of Commitments in accordance with section 75F (6) of the EP&A Act. The inclusion of appropriate environmental management measures into the detailed design and construction of the project would minimise potential adverse impacts on the environment. The construction and operation would be undertaken in accordance with an Environmental Management System(s) (EMS) to the standard of ISO 14001 or equivalent.

The EMS would provide an overarching system to achieve the environmental management objectives for the Project and address commitments in the Environmental Assessment. This would also include the Ministers Conditions of Approval and any environmental due diligence requirements identified by the Proponents and/or contractor.

A Construction Environmental Management Plan(s) (CEMP) and Operational Environmental Management Plan(s) (OEMP) would be an important component of the EMS and reiterate the commitment of Delta Electricity, EnergyAustralia and its contractors to mitigation of environmental impacts identified in this assessment.

The Draft Statement of Commitments describes the environmental management and monitoring to be undertaken during the construction and operation of Marulan Gas Turbine Facilities.

19.2 Environmental Management

19.2.1 Construction Environmental Management Plan

Environmental management during the construction phase of the proposed project would be undertaken in compliance with the requirements of a CEMP. The CEMP is an administrative tool outlining environmental management practises, safeguard measures to be implemented, timing of their implementation, and management and monitoring of the process and procedures. The CEMP must be adhered to during the construction of the Gas Turbine Facilities. The CEMP may be a suite of documents addressing construction for each of the Delta Electricity (Stage 1 and Stage 2) and EnergyAustralia Facilities. It would identify where there are shared responsibilities and provide a cohesive management approach for the Site. The CEMP(s) would address the shared infrastructure, shared works, each individual Facility and the staged nature of the development.

The key objectives of the CEMP would include:

- ensuring that works are carried out in accordance with appropriate environmental statutory requirements, the conditions of approval for the project, relevant guidelines and existing environmental management systems and procedures;
- ensuring that works are carried out in accordance with the goals and requirements presented in the Environmental Assessment;
- ensuring that works are carried out in such a way as to minimise the likelihood of environmental degradation occurring;

- ensuring that works are carried out in such a way as to manage the impact of the works on neighbouring land uses;
- ensuring that all employees engaged in the works comply with the terms and conditions of the CEMP;
- providing clear procedures for management of environmental impact including corrective actions; and
- identifying management responsibilities and reporting requirements to demonstrate compliance with the CEMP.

Generally the CEMP would include:

- establishment of environmental goals and objectives;
- conditions of project approval;
- lists of actions, timing and responsibilities;
- identification of areas of responsibility for environmental management of the project;
- statutory requirements – licences and approvals required;
- a structured reporting system detailing all relevant matters on a regular basis;
- procedures and forms for documentation and reporting of issues;
- training of personnel in environmental awareness;
- guidelines for emergencies, contact names and corrective actions for non-conformance and notifications to appropriate authorities and affected parties;
- auditing implementation of the CEMP;
- review procedures and protocols for modification of the CEMP;
- complaint handling procedure;
- site management and control procedures; and
- monitoring procedures.

Specifically, the CEMP would provide management actions in relation to:

- erosion and sediment control;
- surface water management;
- waste generation and disposal;
- flora and fauna management
- Aboriginal cultural heritage;
- the control of atmospheric emissions;
- the control of construction traffic movements;

- the control of noise emissions; and
- consultation.

Environmental Management Representative

Depending on the construction sequence of the Facilities, one or multiple Environmental Management Representatives would be appointed for the construction of the shared works, the construction of the EnergyAustralia Facility and the construction of the Delta Electricity Facility.

Consultation Plan

Delineation of consultation responsibilities would be detailed in a consultation plan developed as part of the CEMP. Responsibilities under this plan would include ongoing consultation with stakeholders and detail of processes to receive, manage and respond to complaints. It is anticipated that a single complaints line would be administered for the construction phase of the Project, with a jointly managed response process to be developed.

19.2.2 Operational Environmental Management Plan

An Operational Environmental Management Plan(s) (OEMP) would be prepared for the Facilities, which would address the key ongoing monitoring requirements. Similar to the CEMP, the OEMP may be a suite of documents addressing operation for each of the Delta Electricity (Stage 1 and Stage 2) and EnergyAustralia Facilities. It would identify where there are shared responsibilities and provide a cohesive management approach for the Site. The OEMP(s) would include:

- details of proposed maintenance and monitoring programs;
- responsibility for maintenance and monitoring for each Facility and areas where there is shared responsibility;
- reporting requirements;
- permits, approvals and consents issued under the approval process;
- community liaison such as complaints registers and a 24-hour hotline;
- the appropriate standards and protocols for the necessary controls, monitoring and remediation measures;
- auditing procedures;
- response plans for contingency events;
- properly established operating procedures;
- environmental training and education at all levels;
- monitoring system, review of plans and progress toward achieving objectives and goals;
- non-compliance handling procedures; and
- environmental quality controls.

Chapter 19 Draft Statement of Commitments

Consultation Plan

Delineation of consultation responsibilities would be detailed in a consultation plan developed as part of the OEMP. Responsibilities under this plan would include ongoing consultation with stakeholders and detail of processes to receive, manage and respond to complaints. It is anticipated that a single complaints line would be administered for the operational phase of the Project, with a jointly managed response process to be developed.

19.3 Draft Statement of Commitments

A number of environmental safeguards and mitigations measures to prevent or minimise environmental impacts as a result of the construction and operation of the Gas Turbine Facilities are proposed. These measures would be incorporated in both EMPs and implemented throughout the life of the project.

Table 19-1 summarises these safeguard measures as a statement of commitment, sets out priorities for implementation (construction and operation). The phase of implementation is indicated in the table by *Cons* – Construction *Ops* – Operation, *Planning* and *Design.*

Table 19-1 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
General			
The Proponent would carry out construction and operation in accordance with the: – Concept and Project Applications; and – Agreed Statement of Commitments.	✓ (Planning, Cons. & Ops)	✓ (Planning, Cons. & Ops)	✓ (Planning, Cons. & Ops)
Monitoring would be undertaken in accordance with the Environmental Protection Licence.	✓ (Cons & Ops)	✓ (Cons & Ops)	
Environmental Management			
The construction and operation would be undertaken in accordance with an Environmental Management System(s) to the standard of ISO 14001 or equivalent.	✓ (Cons & Ops)	✓ (Cons & Ops)	✓ (Cons & Ops)
The EMS would provide an overarching system to achieve the environmental management objectives for the Project and address commitments in the statement. This would also include the Minister's Conditions of Approval and any environmental due diligence requirements identified by the Proponents and/or contractor.	✓ (Cons & Ops)	✓ (Cons & Ops)	✓ (Cons & Ops)
Prepare and implement: – CEMP(s); and – OEMP(s). Which include the specific measures outlined in the following sections of this table. These may be developed as a suite of documents that would address each Facility, shared infrastructure, staging of the development and shared responsibilities.	✓ (Planning, Cons. & Ops)	✓ (Planning, Cons. & Ops)	✓ (Planning, Cons. & Ops)

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Depending on the construction sequence of the Facilities, one or multiple Environmental Management Representatives would be appointed for the construction of the shared works, the construction of the EnergyAustralia Facility and the construction of the Delta Electricity Facility.	✓ (pre-Cons)	✓ (pre-Cons)	✓ (pre-Cons)
Consultation			
Further consultation and negotiation would occur with affected property owners along the potential Gas Pipeline routes.			✓ (Planning, Cons. & Ops)
Consultation will continue with stakeholders during the planning, detailed design, construction, operation and maintenance of the Facilities, as needed.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	✓ (Cons. & Ops)
Notify potentially affected local residents and businesses of construction activities, as needed.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
Develop and implement protocols to notify stakeholders of relevant activities and as appropriate, any relevant incidents should they occur.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	✓ (Cons. & Ops)
A consultation plan would be developed as part of the CEMP / OEMP to outline a coordinated, jointly managed consultation process for the Facilities. A single complaints line would be established for the two Facilities with a jointly managed response process to be developed.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	✓ (Cons. & Ops)
Air Quality			
Liaise with Civil Aviation Safety Authority (CASA) to address the issue of potential aviation hazard of the plant.		✓ (Design)	
The Construction Environmental Management Plan (CEMP) would consider the most appropriate dust mitigation method suited to the activity and circumstances. This would likely include measures such as: • watering, spraying or covering earthworks during excavation and handling, and on exposed surfaces and stockpiles; • scheduling activities for more favourable meteorological conditions; • covering or limiting truck soil loads; • reducing speed limits on unsealed surfaces; and • cleaning soil off the undercarriage and wheels of trucks when required.	✓ (Design & Cons)	✓ (Design & Cons)	✓ (Design & Cons)
Any long-term stockpiles would be stabilised (for example using measures such as fast seeding grass or synthetic cover spray).	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)

Chapter 19 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Delta Electricity and EnergyAustralia both monitor GHG emissions and thermal efficiency and, when possible, implement programs to improve operational performance to reduce emissions.		✓ (Ops.)	
Noise and Vibration			
Prepare and implement a Construction Noise Management Plan (CNMP) within the CEMP to consider, if appropriate: • positioning of plant / processes; and • limiting the "clustering" of plant / processes.	✓ (Design & Cons)	✓ (Design &Cons)	
EnergyAustralia Facility and Delta Electricity Facility Stage 1 would incorporate the following inherent noise treatments into the design: • air intake silencers; • generator transformer walls on three sides; and • exhaust air silencers.		✓ (Design)	
Delta Electricity Facility Stage 2 detailed design would incorporate mitigation measures as necessary to achieve the specified noise limits.		✓ (Design & Ops)	
Where operational noise is predicted to exceed the noise criteria for residential dwellings (established in accordance with the Industrial Noise Policy (INP) guideline and most recent assessment process) property acquisition or negotiated agreements would be put in place.		✓ (Design)	
Low frequency noise would be addressed during detailed design, consistent with the most recent assessment process that has been developed overseas in lieu of the INP.		✓ (Design)	
Further assessment would be undertaken of the noise and vibration impacts associated with the construction and operation of the gas pipeline.			✓ (Planning)
Soils, Geology and Groundwater			
A Construction Soil and Water Management Plan would be developed and implemented to ensure effective management of potential soil erosion issues.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
All construction works would be undertaken in a manner to minimise the potential for soil erosion and sedimentation, and managed through a Soil and Erosion Control Plan. These measures would be incorporated into the CEMP.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
As a minimum the measures outlined in the *Managing Urban Stormwater – Vol 1 Soils and Construction* would be implemented. Measures may include: • limiting slope length; • installation of sediment filters; and • the construction of a sedimentation basin downstream of the disturbed areas.	✓ (Design &Cons.)	✓ (Design &Cons.)	✓ (Design &Cons.)
Soil erosion and sedimentation devices would remain in place until the surface is restored. These devices would also capture any gross pollutants.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
Where practicable, disturbed areas would be quickly revegetated or covered with a non-erodable surface following construction.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
Should the earthworks be progressed at the same time for both Facilities and if there is a time lag between further construction, appropriate longer term erosion control measures would be implemented on that vacant pad area until further work for construction of the Facility commences.	✓ (Cons.)	✓ (Cons.)	
Subject to design requirements, where excavation work extends into bedrock, suitable material may be reused as engineering fill on the Site.	✓ (Design)	✓ (Design)	
Assess need for groundwater control and collection system during further geotechnical investigations.	✓ (Design)	✓ (Design)	
Depending on engineering design requirements for the fill, material excavated from the Site (except for up to 150 mm of topsoil and root-affected material) may be used as engineered fill in any cut / fill operations.	✓ (Design & Cons.)	✓ (Design & Cons.)	
Construction would be planned to minimise the time that disturbed land is exposed.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
Water required for dust suppression would be sourced from the existing dams on the Site where available and practicable, or imported if necessary.	✓ (Cons.)	✓ (Cons.)	✓ (Cons.)
Appropriately bunded areas would be included for storage of fuels, oils and chemicals.	✓ (Cons.)	✓ (Cons. & Ops)	✓ (Cons.)
Areas within the Facility area would be appropriately drained so that surface runoff would be prevented from infiltrating directly onto the ground and from reaching the groundwater.	✓ (Cons. & Ops.)	✓ (Cons. & Ops.)	
All possible pollutant materials would be stored well clear of Site boundaries and stormwater drainage lines and stored in a designated covered area.		✓ (Ops.)	
Waste disposal and collection would be properly undertaken.	✓ (Cons. & Ops.)	✓ (Cons. & Ops.)	

Chapter 19 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
All major vehicle maintenance would be undertaken offsite.	✓ (Cons. & Ops.)	✓ (Cons. & Ops.)	
Stormwater and wastewater ponds would be lined with an appropriate impermeable liner to minimise the risk of water escaping into the natural groundwater system.		✓ (Design & Ops.)	
Traffic and Transport			
Further traffic assessments undertaken: – to review what works may be required to bridges, causeways, traffic islands, intersections and drainage culverts along Canyonleigh and Brayton Roads to facilitate the construction and operation of the Facilities; – to identify and cater for any necessary remedial treatments to facilitate passage to the Site along Canyonleigh and Brayton Roads once the actual weight and dimensions of the proposed plant are known; and – in consultation with Goulburn Mulwaree and Upper Lachlan Shire Councils.	✓ (Design & Cons)	✓ (Design & Cons)	
Pre construction evaluation of pavement condition of Brayton Road (between George Street intersection and Canyonleigh Road intersection) and Canyonleigh Road (from intersection of Brayton Road to the Site).	✓ (prior to Cons)		
Post construction evaluation of pavement condition of Brayton Road (between George Street intersection and Canyonleigh Road intersection) and Canyonleigh Road (from intersection of Brayton Road to the Site) to determine remedial action required following passage of oversized vehicles.		✓ (post- Cons)	
Transport of over-mass and over- dimensional loads to be undertaken under RTA and NSW Police permit conditions and approved routes.	✓ (Cons)	✓ (Cons)	
Biodiversity			
As part of the Environmental Management Plan, prepare and implement a Vegetation Management Plan which complies with the DECC (2006a) guidelines.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Management actions would include the implementation of an offset strategy and include measures (as appropriate) such as: • exclusion of grazing through fencing; • weed removal and control; • erosion control; • retention of fallen timber, hollow logs, leaf litter, rocks and other habitat resources; • installation of nest boxes for displaced arboreal fauna (if required); • maintenance and monitoring of natural surface water quality and flows; • control of feral animals, where appropriate and practical; • timing construction to recognise breeding seasons of resident fauna (where practical); • setting low maximum speed limits to reduce fauna road fatalities; • limiting vehicular and personnel entry to adjacent vegetation through appropriate fencing; and • using down-lights and motion sensor lighting in order to reduce impacts on fauna species using woodland.	✓ (Planning, Cons. & Ops)	✓ (Planning, Cons. & Ops)	
Implement an offset strategy with key measures such as: • maintenance of woodland biodiversity values through permanent conservation of approximately 32.3 ha of Tableland Hills Grassy Woodland. Land portion to be re-titled (with VCA or equivalent) for this purpose in perpetuity; • rehabilitation of 9 ha of riparian vegetation and adjoining cleared land in Riparian Rehabilitation Zone. Creation of vegetated corridor connecting offset area to nearby woodland stands and adjacent riparian zone; and • temporary exclusion fencing of offset area during construction.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	
The CEMP would detail procedures for a pre-clearance survey and fauna management and groundcover clearance to reduce direct impacts to tree dwelling fauna and minimise impacts from clearing of vegetation.	✓ (Cons.)		
A Weed and Pest Management Plan would be prepared as part of the EMP for the Site, which would aim to actively control feral animals and noxious weeds.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	
The CEMP would formulate safeguard measures to reduce soil erosion and pollutant runoff for the Site particularly for waterbodies.	✓ (Cons. & Ops)	✓ (Cons. & Ops)	

Chapter 19 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Disturbed sites would be quickly revegetated or covered with a non-erodable surface following construction.	✓ (Cons.)	✓ (Cons.)	
Further assessment would be undertaken of the gas pipeline route during the Project Approval phase for that component. Depending on engineering constraints, variations in the route alignment would be considered to avoid areas of high conservation value, where possible.			✓ (Design)
A CEMP would be developed to address the construction of the gas pipeline. It would also address revegetation of cleared areas following construction of the pipeline.			✓ (Cons.)
Cultural Heritage			
A sub-surface investigation program would be undertaken when the areas of ground disturbance within the Marulan Site for the Facilities and associated infrastructure are known following detailed design, prior to construction. This sub-surface investigation program would aim to determine the presence of Aboriginal archaeological sites and to identify the importance of the recorded sites. The draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation would be followed.	✓ (Design)		
All reasonable attempts would be made to avoid significant Aboriginal archaeological sites within the Study Area through changes to the proposed design and construction methods.	✓ (Design)		✓ (Design)
If the Aboriginal archaeological cultural material cannot be avoided, then all reasonable attempts to reduce impact would be made through the development of a Cultural Heritage Management Plan (CHMP). The CHMP would outline strategies for dealing with recorded and un-recorded Aboriginal archaeological sites encountered within the proposed development area.	✓ (Design & Cons.)		
Further assessments would be undertaken as part of the Project Application for the Gas Pipeline.			✓ (Design)
Visual Amenity			
Subject to CASA requirements, where practicable, colour and texture of structures in the proposed Facilities would be appropriate and utilise non-reflective materials		✓ (Design)	
Tree and shrub planting would be carried out within the general site area to provide additional screening to views from surrounding properties. Consideration would be given to planting on mounding within the Site.		✓ (Design, Cons & Ops.)	
Where practicable, tree planting within selected private residential properties would be considered, subject to negotiation and agreement by property owners.		✓ (Design & Ops.)	

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Lighting design would avoid direct line of sight from properties surrounding the proposed Facilities.		✓ (Design & Ops.)	
Top of the exhaust stacks would not have lighting unless requested by CASA.		✓ (Design & Ops.)	
Measures would be employed to avoid light spill from security lighting onto surrounding residences.		✓ (Design & Ops.)	
Further assessment of impact on visual amenity of the Gas Pipeline would occur at Project Approval Stage.			✓ (Planning)
Water Cycle Management			
As a way of further enhancing public infrastructure, and if deemed viable, upgrade works would be undertaken to local sewage treatment facilities to meet the Facilities' operational water requirements.	✓ (Cons & Ops)	✓ (Cons & Ops)	
Site Design			
The Facilities would be designed to incorporate the following: • minimum elevation of risk averse property within the Facility is to be approximately 605 m AHD to minimise the potential for flooding; and • maintaining approximately 150 m between the Wollondilly River and the Facilities.		✓ (Design)	
Soil Erosion			
All construction works would be undertaken in a manner to minimise the potential for soil erosion and sedimentation. Construction works would also be managed through a Soil and Erosion Control Plan. These measures would be incorporated into the CEMP. The CEMP would address the potential staging of the bulk earthworks: • should the bulk earthworks be progressed at the same time for both Facilities and if there is a time lag until further construction, measures required for longer term erosion control would be implemented on the vacant pad area until further work for construction of that facility commences; and • in the event that earthworks progress separately for the two Facilities, then each Facility site would manage the earthworks and runoff appropriately through a Soil and Erosion Control Plan.	✓ (Cons)	✓ (Cons)	✓ (Cons)
Spills and site management			

Chapter 19 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
All possible pollutant materials would be stored well clear of site boundaries and stormwater drainage lines and stored in a designated covered area.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Appropriately bunded areas would be included for storage of fuels, oils and chemicals.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Waste collection areas would be designated.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Appropriate bunding would be installed and appropriate containers would be provided.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Waste disposal and collection would be properly undertaken.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
All major vehicle maintenance would be undertaken off-site.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Any vehicle washing on-site would be restricted to designated bunded areas.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	
Staff facilities would be installed and maintained so that pollutants, including wash water are not conveyed from the site in stormwater to ensure zero discharge to the environment.	✓ (Design & Cons. & Ops.)	✓ (Design & Cons. & Ops.)	✓ (Cons.)
Surface water			
There would be no direct drainage from the Site to the Wollondilly River other than natural surface flows.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Water management strategies would be developed and implemented to maintain zero discharge from the site except for natural surface flows.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Water from impervious surfaces would be directed through oil and grit traps designed to remove any oil and minimise suspended solids to an acceptable level, prior to discharge from the site. This system may also be fitted with a gross pollutant trap to collect any large material mobilised by stormwater.	✓ (Design & Ops.)	✓ (Design & Ops.)	
The outlet of the Facilities' stormwater system would be designed to maximise the dispersion of these high flows and spread the outflow over a wider area and thereby minimise their potential to cause soil erosion downstream.	✓ (Design & Ops.)	✓ (Design & Ops.)	

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Wastewater Treatment			
Maintain a minimum distance of 150 m from the Wollondilly River for effluent management areas.	✓ (Design & Cons.)	✓ (Design & Cons.)	
Staff facilities would be installed and maintained so that pollutants, including wash water are not conveyed from the site in stormwater. All wastewater generated during the construction period would be disposed of offsite to a licensed facility.	✓ (Design & Cons.)	✓ (Design & Cons.)	✓ (Cons.)
"Black" wastewater generated during operations would be treated by a proprietary septic-type system and waste products stored and then disposed of offsite by a licensed contractor.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Clean water drains would be directed to the stormwater storage pond from which any stormwater flow would be released in a regulated manner.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Dirty water drains would be directed to settlement ponds and oil/water separators before discharge to the on-site wastewater pond.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Contaminated drains would be directed to a contaminated drains tank with oil water separator. Oil would be disposed offsite to a licensed facility and water would be directed to the on-site wastewater pond.	✓ (Design & Ops.)	✓ (Design & Ops.)	
Preliminary Hazard Analysis			
In accordance with Department of Planning's HIPAP No. 3 *(Environmental Risk Impact Assessment Guidelines),* the safety assessment process would continue throughout the design, construction and commissioning of the Facility to refine and update the outcome of the development approval / environmental risk process.		✓ (Design & Ops.)	
An assessment of the safety management system implemented and used at the site, specifically as it applies to the proposed hazardous materials handling, pipelining and storages, would be conducted within the first year of operation.		✓ (Ops.)	
Leak detection equipment would be used in areas where high risk natural gas piping is used (high likelihood of leak and/or confined locations).		✓ (Design & Ops.)	
The detailed design of the turbine housing and associated equipment would clearly outline the safety approach used to ensure that explosive situations do not arise (the risk is rendered negligible). Reference should be made to European ATEX Directive and the UK HSE PM84 or other guidance / regulation of equivalent safety.		✓ (Design)	

Chapter 19 Draft Statement of Commitments

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Fire protection ratings inside the turbine housing would be determined, including use of explosion panels and use of fire retardant material.		✓ (Design)	
Installation of an automatic valve at the site boundary to isolate natural gas supply from the site in case of a major leak at one of the natural gas pipes on site. The reliability of this automatic valve to close on demand is set as 95% (SIL1). A major leak is regarded as one which results in a mass flow through the hole in the pipe of 5 kg/s or more.		✓ (Design)	
An assessment of the safety management system as relevant to the gas delivery pipeline would be conducted within the first year of operation.			✓ (Ops.)
Bush Fire			
Prepare Bush Fire Management Plan within the CEMP.	✓ (Cons)	✓ (Cons)	
Prepare Bush Fire Management Plan within the OEMP, which could include measures such as management and maintenance of Asset Protection Zone(s), landscaping and vegetation management, water supply, access and other bush fire protection measures for the Site.	✓ (Ops)	✓ (Ops)	
Include emergency response provisions for bush fire in a site emergency response plan. The plan would include evacuation arrangements, drills and nominated control staff for bush fire events.		✓ (Ops)	
Where practicable, provide an Asset Protection Zone approximately 10 m to 15m wide around the Site boundaries.	✓ (Design & Ops)	✓ (Design & Ops)	
Where practicable, the Asset Protection Zone would be managed as follows: • according to the *Standards for Asset Protection Zones* (RFS 2007); • groundcover and understorey strata would be managed to avoid accumulations of dense grass, weeds or shrubs; • dense swards of grass would be slashed prior to summer or as required; • shrubs should be thinned only as required to ensure no connection to canopy stratum; and • maintain fuel loads through mowing/slashing during the spring/early summer months, as required.	✓ (Design & Ops)	✓ (Design & Ops)	
Where practicable, provision of water tank(s) at appropriate locations (in consultation with RFS) within the Facilities, fitted with Storz valves compatible with RFS hoses.	✓ (Design & Ops)	✓ (Design & Ops)	
Provide access for fire fighting vehicles to all parts of the Site.		✓ (Design)	

Mitigation Measures	Implementation of mitigation measures		
	Common Shared Works	Facilities	Gas Pipeline
Where practicable, landscaping would include the following features: • tree canopy separation by at least 2 m; • discontinuous shrub layer (clumps or islands of shrubs where possible; not rows); • vertical separation between canopy and shrub layer; • tree canopies not overhanging structures; • no landscaping trees within 2 m of any building; • use of non-combustible mulch, e.g. stones; and • use of 'fire retardant' species of local provenance.	✓ (Design & Ops)	✓ (Design & Ops)	
Vegetation near transmission lines would be managed in accordance with EnergyAustralia (2007) *Tree Safety Management Plan*.	✓ (Design & Ops)	✓ (Design & Ops)	
Socio Economic			
Where possible, suitable personnel would be sourced from the region.	✓ (Cons & Ops)	✓ (Cons & Ops)	
Delta Electricity and EnergyAustralia recognise their part in their long term presence within the community for this Project and would explore means for contribution to the community on a case by case basis.	✓ (Cons & Ops)	✓ (Cons & Ops)	
As a way of further enhancing public infrastructure, and if deemed viable, upgrade works would be undertaken to local sewage treatment facilities to meet the Facilities' operational water requirements.	✓ (Cons & Ops)	✓ (Cons & Ops)	