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Level 16, 4PSQ  
12 Darcy Street  
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24<sup>th</sup> January 2023

BHB-AGL-HS-GEN-0081

Dear Katrina,

### **SSD – 11437498: Response to independent environmental audit recommendations**

AGL Energy Limited (**AGL**) received development consent under section 4.38 of the NSW *Environmental Planning and Assessment Act 1979* to construct the Broken Hill Battery Energy Storage System (**Project**) at Broken Hill, NSW on 8<sup>th</sup> September 2021. Following a request for modification of that development consent, revised conditions were granted by the Department on 15<sup>th</sup> July 2022 for SSD 11437498-Mod-1 (**Modified Development Consent**).

In accordance with the Modified Development Consent Schedule 4 Condition 12, AGL submitted the completed Independent Environmental Audit on 20<sup>th</sup> January 2023. Following an update to the audit, as requested by DPE Compliance, AGL now provides a formal response the recommendations identified in the audit.

**Recommendation 1:** ERM noted that there was no waste tracking system for all wastes coming from the Project, and waste segregation was limited to skip bins and can recycling. ERM noted this was in part due to there being a limited selection of waste facilities in the region. As per the Project Construction Environmental Management Plan (CEMP), in section 4.7 it notes that waste from the Project would be tracked and recovery of waste would be implemented.

**Response to Recommendation 1:** AGL notes ERM's comment and acknowledges the challenges of recycling with limited facilities in a regional location. All wastes are segregated and volumes tracked through a licensed waste provider. The project recycles bottles, cans, steel and cable. There is a mixed solid waste bin on site, in which items may be recycled (plastics, wood, cardboard) by the waste provider. Hazardous waste is tracked and chain of custody records are completed. The project complies with Section 4.7 of the CEMP.

**Recommendation 2:** ERM suggest providing more waste segregation infrastructure for building materials and office waste that can be re-used and recycled.

**Response to Recommendation 2:** Due to the restricted recycling facilities in Broken Hill, it is not currently practicable to increase waste segregation further than is currently in place. AGL has arranged for some bottle and cans recycling on site.

**Recommendation 3:** ERM recommended that noise and vibration monitoring measures or methods were implemented on the weekly HSE Checklist and the monthly Environmental Inspection Checklist.

**Response to Recommendation 3:** A noise and vibration assessment was undertaken on site as part of the works undertaken for the request to extend working hours process in Q4 2022. This was submitted to DPE as part of the response to RFI for that request. Current boundary noise levels are within required limits and controls have been established and are monitored. There is no material risk of noise onsite. AGL will work with our Principal Contractor on site to consider improvement opportunities to the existing checklists.



**Recommendation 4:** ERM reviewed Table 6-1 Project Monitoring Requirements and Data Recording in the Project Construction Environmental Management Plan (CEMP), and suggested increasing the frequency of contamination checks from weekly to daily; recording potable water use from monthly to weekly; Environmental Inspections as part of CEMP from monthly to weekly; and, waste material tracking from monthly to weekly.

**Response to Recommendation 4:** AGL will work with our Principal Contractor on site to consider these increased frequency of monitoring suggestions. Daily checks are currently undertaken, along with site meetings and evaluation of controls. Waste tracking is provided monthly by the waste contractor; however, volumes within the waste bins are monitored weekly.

If you require any further information, please do not hesitate to contact Vicki Brady, Manager, Environment – Energy Hubs on [VBrady@agl.com.au](mailto:VBrady@agl.com.au) or 0499 304 473.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hamid Shilani'.

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