4 July 2022

To EPA Victoria

RE ExxonMobil's proposed 'Hastings Generation Project' (HGP) at Long Island Point, Hastings,

https://www.epa.vic.gov.au/esso-pty-ltd

Further to our April 15 submission objecting to Esso/ExxonMobil's proposed H.G.P. and operations at Long Island Point, Save Westernport submits the following additional questions and concerns responding to further information and answers posted by EPA on May 5 & June 15, 2022.

Yours Sincerely

[redacted] – Secretary, Save Westernport

[redacted]

Questions and Community concerns about Esso's Application to EPA for a new gas fired (ethane) power station on the Mornington Peninsula

Current Emissions – identifying the baseline for total emissions from LIP

1. What are the total existing Scope 1,2 & 3 CO2e emissions from the Long Island Point facility for each of the last three years?

2 What are the annual volumes of ethane, propane and butane that are currently flared at Long Island Point - in each of the last 3 years?

3 How often and in what volumes are there uncontrolled releases of unburned/vented ethane, propane or butane at Long Island Point? What are the volumes and types of emissions released through this process?

4 Does Esso have an exemption from EPA Victoria to exclude the use of steam or air suppression systems for smokeless flaring at Long Island Point and if so why and for how long?

5 What are the projected total annual gas volumes to be produced in Bass Strait between 2023 and 2033 and the volumes of ethane to be produced?

Concerning the proposed project

6 What real world evidence does Esso have of ethane-only generator power stations and their operations and emissions?

7 Can Esso supply such evidence of working ethane power stations and their emissions to back up their modelled annual emissions?

8 Why is there so much variation in ethane volumes and emissions across the first 5 operating years?

9 If the ethane gas turbines were operating at maximum capacity, what would be the projected reduction in black smoke flaring events at Long Island Point? How much flaring would still continue?

10 What is the maximum annual volume of ethane that the proposed Hastings Generation Project (three Solar Titan 130 gas turbines) could consume when operating at maximum capacity 24 hours per day 7 days per week and what would the emissions be?

11. Why did Esso not consider the alternative scenario of Altona as the location for the proposed ethane gas turbines facility to generate electricity?

Specific response from SWP concerning answer re fire on the Suiso Frontier – brown hydrogen, HESC project

12. An email from [redacted] on June 23 stated “EPA attended a community information session hosted by Esso Australia Pty Ltd on 5 May 2022. After the information session, EPA followed-up on some issues”.

SWP notes with particular concern that item #3 in EPA’s information to community stakeholders contained flawed and incorrect information about an emergency incident on board the Kawasaki Heavy Industry’s Hydrogen tanker, the Suiso Frontier and we ask that this be corrected.

EPA responded to the community question that “there was no unplanned fire”, stating:

3. Kawasaki ship incident – EPA investigated and have been advised by the harbour master that there was no unplanned fire aboard the ship, the fire that could be seen ashore was a planned event using a thermal oxidiser which is part of the existing infrastructure on the ship.

It has been widely reported both in the local news and other sites that, the Suiso Frontier was involved in an emergency incident on January 25, 2022.

The incident occurred after the Suiso Frontier was loaded with hydrogen in preparation for the return leg of its maiden voyage to test the viability of “world first” international hydrogen transportation between the Port of Hastings and Kobe Japan.

The fire, which occurred onboard the ship at about 10.45pm on 25 January was categorised as a “serious incident” by the Australian Transport Safety Bureau (ATSB).

The Suiso Frontier fire is currently under investigation, with an incident report due in the second half of 2022, according to the Australian Transport Safety Bureau’s notice.

https://www.atsb.gov.au/publications/investigation_reports/2022/mair/mo-2022-001/

Details of the incident in a Western Port News report were republished in several international publications, including
Hydrogen Central.
https://hydrogen-central.com/fire-breaks-first-cargo-liquefied-hydrogen-ship-australia/

The ATSB expects its investigation into the fire will be completed sometime after June. The initial report on the bureau’s website states that the combustion unit was “immediately shutdown [after the flame was seen] and isolated before the crew implemented the fire prevention response plan”.

It is extremely concerning to us that the incident was downplayed by EPA, while inaccurate information was distributed to stakeholders and residents of the neighbouring community of Hastings.

The incident, summarised in the report below, occurred at BlueScope Hastings, one of the Major Hazard facilities immediately adjacent to the proposed site of three, apparently untested ethane generators at Esso’s Long Island Point.

Marine safety investigations & reports

Gas control equipment malfunction on board the gas tanker *Suiso Frontier* at Western Port, Hastings, Victoria on 25 January 2022

Investigation number:
MO-2022-001

Status: **Active**
Phase: **Evidence collection**

SUMMARY

The ATSB is investigating a gas pressure control equipment malfunction on board the gas carrier *Suiso Frontier* after the ship had loaded liquefied hydrogen at Western Port, Hastings.

At 2147 AEST on 25 January 2022, a flame was seen coming from the gas combustion unit's exhaust on deck. The unit was immediately shutdown and isolated before the crew implemented the fire prevention response plan.

No further abnormalities were reported and there were no injuries, damage or pollution. As part of the investigation, the ATSB will interview relevant persons and obtain other evidence, including recorded data.

Should a critical safety issue be identified at any time during the investigation, the ATSB will immediately notify operators and regulators so appropriate and timely safety action can be taken. A final report will be published at the conclusion of the investigation.

General details

Date:	25 January 2022	**Investigation status:**	Active
Time:	21:47 AEST	**Investigation level:**	Short
Location (show map):	Port of Hastings	**Investigation phase:**	Evidence collection
State:	Victoria		
Release date:	31 January 2022	**Occurrence category:**	Serious Incident
Report status:	Pending		
Anticipated completion:	3rd Quarter 2022		

Vessel details

Operator	HySTRA
Vessel	Suiso Frontier
Flag	Japan
IMO	9860154
Sector	Tanker
Type of operation	Liquefied Gas Tanker
Departure point	Port of Hastings, Victoria
Destination	Port of Gladstone, Queensland