



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Once completed, please submit this form either via email to [info-der@dwer.wa.gov.au](mailto:info-der@dwer.wa.gov.au), or to the below postal address:

Department of Water and Environmental Regulation  
Locked Bag 33 Cloisters Square  
PERTH WA 6850

Section A – Licence Details			
Licence number:	L6637/1995/15	Licence file number:	DER2015/000109-3
Licence holder:	Electricity Generation and Retail Corporation		
Trading as:	Synergy		
ACN:	N/A		
Registered address:	Collie Power Station, Part of Lot 3001 on Plan 51101		
Reporting period:	01/07/2020 to 30/06/2021		

Section B – Statement of Compliance with Licence Conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required; and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D if required;</li><li>• section E; and</li><li>• sign the declaration at Section F.</li></ul>

Section C – Statement of Actual Production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Production Quantity
12 – Screening, etc. of material	0.49 million T consumed
52 – Electric power generation	340 MWe

Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
53 – Flyash disposal	42,758 T

Section D – Statement of Actual Part 2 Waste Discharge Quantity			
61 – Liquid waste facility		738,681 kL	
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	2.3.2	Date(s) of non-compliance:	20/11/2020
Details of non-compliance:			
<p>Exceedance of upper pH limit (8.5) for saline water disposal system. Saline disposal weekly sample collected at monitoring point M1 on 20/11/2020 had pH of 9.4. pH measurements of saline water recorded by continuous pH monitoring system also indicated elevated but fluctuating pH.</p> <p>Disposal of saline water with elevated pH occurred for 3 hours and 20 minutes. Based on pump rate and event duration, the discharge volume related to the event was approximately 203m<sup>3</sup>.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
Suspected no impact, or insignificant impact due to short duration of event and small discharge volume. Ambient ocean water has pH around 8. Once mixed with ambient ocean water, the discharge would have been heavily diluted causing minimal environmental impact.			
Cause (or suspected cause) of non-compliance:			
<ol style="list-style-type: none"> <li>1. Water treatment plant continuous pH meter malfunctioned which affected water treatment. Elevated pH detected by continuous pH monitoring system at M1. Local (hand-held) pH meter used to verify pH indicated that pH was within licence limits. This local pH meter was out of calibration.</li> <li>2. Site process not followed, which delayed shut down of the saline water disposal system in response to elevated pH recorded by continuous pH monitoring system.</li> </ol>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ol style="list-style-type: none"> <li>1. Dual saline water monitoring system installed to provide additional continuous pH, electrical conductivity and temperature data.</li> <li>2. Alarm limits reviewed and modified so alarms are triggered prior to licence limits being reached.</li> <li>3. Process logic revised to ensure that plant shut down can't be overridden.</li> </ol>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 3/08/2021 and 20/08/2021	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.3.1	Date(s) of non-compliance:	Week commencing 28/09/2020 Week commencing 31/05/2021
Details of non-compliance:			
Weekly surface water samples not collected from monitoring point M1 for: <ul style="list-style-type: none"> <li>• week commencing 28/9/2020; and</li> <li>• week commencing 31/05/2021</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Suspected no impact. In addition to weekly spot samples (analysed for pH, temperature and Total Suspended solids), continuous measurement of pH and turbidity occurs. Continuous data indicates that saline water disposed for these weeks met pH limits and had minimal turbidity.			
Cause (or suspected cause) of non-compliance:			
Site process not followed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Third party contractor engaged to collect all compliance samples.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 22/07/2021	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.3.1	Date(s) of non-compliance:	14/09/2020 – 30/06/2021
Details of non-compliance:			
Weekly surface water samples collected from monitoring point M1 not analysed for temperature between 14/09/2020-30/06/2021			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impact. Saline water has been discharged at ambient temperature.			
Cause (or suspected cause) of non-compliance:			
Site process not followed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Third party contractor engaged to collect all compliance samples			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	



Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.2.1	Date(s) of non-compliance:	September 2020
Details of non-compliance:			
Temperature data reported in the annual report for the 2019/2020 licence year (submitted September 2020) was not based on weekly sample results. Instead a weekly average of continuous temperature data was reported. This does not reflect requirements of condition 3.3.1.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impact. Reporting convention. Saline water has been discharged at ambient temperature.			
Cause (or suspected cause) of non-compliance:			
Site process not followed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Reviewed data management processes.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 22/07/2021	

Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.2.1	Date(s) of non-compliance:	September 2021
Details of non-compliance:			
Internal audit of the Collie Power Station Ash Dam Environmental Management Plan for 2020/2021 licence year, conducted in September 2021.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impact. Internal audit conducted outside of licence year.			
Cause (or suspected cause) of non-compliance:			
Site process not followed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Reviewed management processes.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date:	

**Section F – Declaration**

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	General Manager Generation	Position:	
Date:	24/9/2021	Date:	
Seal (if signing under seal):			

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.