



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L4706/1972/17	Licence file number:	DER2014/002698-1
Licence holder name:	Electricity Generation and Retail Corporation		
Trading as:	Synergy		
ACN:	673 830 106		
Registered business address:	Forrest Centre 219 St Georges Terrace PERTH WA 6000 Muja Power Station		
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">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D (if required);• section E; and• sign the declaration in Section F.

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
Category 52: Electric power generation	3,344,767 MWh

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
Category 53: Flyash disposal	6761.7 tonnes

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:	4.3.1	Date(s) of non-compliance:	03/12/2020
Details of non-compliance:			
Failure to report NO _x target exceedance at point A3 (stack C): NO _x target of 800 mg/m ³ exceeded on 3 December 2020. An hourly average NO _x concentration of 883 mg/Nm ³ was recorded.			
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
NO _x target exceedance recorded on Stage C, emission point reference on licence A3. Target was exceeded for one hour only, limited environmental impact.			
Cause (or suspected cause) of non-compliance:			
Likely to be related to CEMS failure issue identified on 3 January 2021.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
NO _x levels returned to normal the hour after the event.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and – Not reported to DWER at time of exceedance.			
<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:	3.4.3	Date(s) of non-compliance:	12/03/2021
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Details of non-compliance:

On 12 March 2021 a data review of the PM_{2.5} monitoring at Roche Park determined that the MPS licence requirement to obtain valid data for more than 90 percent in every calendar month for February had not been met. Non-compliance against licence condition 3.4.3 of environmental licence L4706/1972/17 was reported to DWER on 17 March 2021. No impacts to the environment were identified.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No impact to the environment was identified. PM_{2.5} data availability for February 2021 was 89%.

Cause (or suspected cause) of non-compliance:

Technicians identified issues with the BAM data and attended site on 11 and 19 February 2021 to conduct maintenance on the monitoring equipment. A three-day delay to attend site to repair monitoring instrument was critical to the data availability. As there was a time delay to attend site the monthly availability of the monitoring equipment was affected.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Audited monitoring contractor systems and procedures related to ambient monitoring service agreement to ensure that equipment maintenance is conducted within 24 hours to minimise data availability impacts.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date:

Reported to DWER in writing

Date: 17 / 03 / 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:	4.2.4	Date(s) of non-compliance:	14/05/2021
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Details of non-compliance:

April 2021 monthly MPS ambient air report sent to DWER on Monday 17 May (i.e. as soon as it was identified that it had not been submitted - this was the next working day past the submission date of 14 May 2021).

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No environmental impact

Cause (or suspected cause) of non-compliance:

Lack of escalation of task to submit monthly data to DWER.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Monthly ambient report sent to DWER as soon as it was identified that it had not been submitted - this was the next working day past the submission date of 14 May 2021).

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date:

Reported to DWER in writing

Date: 17 / 05 / 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:	30/06/2021
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Details of non-compliance:

At the end of the financial year 2021 it was identified that there was incomplete and erroneous data for W1 (Bottom Ash Dam discharge point) and W2 (Retard Basin discharge point) meter readings. DWER were notified of the incident on 14 July 2021.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

No discharge to the environment occurred.

Cause (or suspected cause) of non-compliance:

The road to the discharge points were blocked for some months of the year due to earth works at the fly ash dam, therefore the meters could not be read. Faulty meter on some occasions causing the readings to be erroneous.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

- Update procedure for Sample Collection of Dam Overflows and Discharge Point Readings
- Develop and implement systematic validation process for meter reading and water sampling
- Develop electronic logbook routine task and maintenance tasks in work management system (SAP) for completion of monitoring requirements in line with the licence obligations.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date:

Reported to DWER in writing

Date: 14 / 07 / 2021



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 particular¹.

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

Signature ² :	[Redacted]	Signature:	
Name: (printed)	[Redacted]	Name: (printed)	
Position:	[Redacted]	Position:	
Date:	[Redacted]	Date:	
Seal (if signing under seal):	[Redacted]		

¹ 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.

² 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.