



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 / 2021 to 30 / 06 / 2022		

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	3,874 MWh
Category 12: Screening, etc. of material	2,013,564 tonnes

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 (Into Containment point C3-Ash Storage Dam)	121,439 tonnes
Category 61: Liquid waste facility	zero discharged off-site

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:	3.5.2	Date(s) of non-compliance:	11/10/2021
Details of non-compliance:			
<p><u>MUJ3 (Muja C) RH (<i>Relative Humidity</i>) valid data not available for greater than 90% of the measurement intervals in the calendar month September and October 2021</u></p> <p>Following receipt of Synergy’s ambient air quality monitoring network monthly report on 11 October 2021, it was identified that ambient air quality monitoring point MUJ3 (Muja C) RH (<i>Relative Humidity</i>) valid data was not available for greater than 90% of the measurement intervals in the calendar month of September 2021, due to instrument fault (reported valid availability 73.2 %). Consultant was requested to investigate immediately.</p> <p>The fault was reported to the Department of Water and Environmental Regulation by Synergy on 12 October 2021. The instrument also failed the first few days of the month of October and this impacted the valid data availability for October 2021. This was reported to the Department of Water and Environmental on 15 November 2021.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No impact on the environment. Appendix 1: Map with the location of where the non-compliance took place.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Failure of Relative Humidity Sensor installed at MUJ3 (Muja C) Ambient Air Quality Monitoring Station.</p> <p>Relative Humidity Sensor installed at MUJ3 (Muja C) Ambient Air Quality Monitoring Station began to have issues with the accuracy of low relative humidity readings on 22 September 2021. No fault notification has been issued by the Consultant.</p> <p>Another fault of relative humidity sensor RH at MUJ3 (Muja C) Ambient Air Quality Monitoring Station has been detected and recorded by a Consultant on 5 October 2021 at MUJ3 (Muja C). During the QA/QC (<i>Quality Assurance/Quality Control</i>) review of September data, the Consultant invalidated relative humidity data between 22/9/21 and 5/10/21 for MUJ3 (Muja C).</p>			

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The Consultant was contacted to investigate immediately and further evaluate. Expectations have been communicated to the consultant that all data invalidation occurrences are to be reported to Synergy within 24 hours.</p> <p>Discussion held with the consultant to investigate the ability to run real-time QA/QC analysis of data collected and options to run other QA/QC that might avoid incidents reoccurrence.</p> <p>The sensor within the instrument has been replaced and the instrument returned to normal operation. The maintenance procedure has been revised to perform an extra high point relative humidity check during the 12-monthly multipoint calibrations on HR sensor to ensure the sensor is accurate in the upper range.</p>	
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: 12 / 10 / 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:	1.1.5 1.2.2	Date(s) of non-compliance:	12/11/2021
Details of non-compliance:			
<u>Diesel Fuel Spill at the 11kV Emergency Generator</u>			
<p>The automatic fuel transfer pump of the 11kV Emergency Generator started, however, the connection hose inside the compound came off and allowed diesel to be released into the bund and surrounding area (estimated volume of diesel 1000 L as reported to DWER under Section 72 Unauthorised Discharges)</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>The full volume of the spill could not be immediately recovered and removed. Suspected impact to the soil in the vicinity of the 11kV generator building. Detailed site investigation has been completed consisting of soil sampling (13-17 June 2022) and groundwater sampling (4-8 July 2022). Soil impacts do not pose an unacceptable risk based on the site's ongoing industrial use. Groundwater investigation has confirmed that hydrocarbon impacts to groundwater are minor and do not pose a risk to either human health or environmental receptors.</p> <p>Appendix 2: Map with the location of where the non-compliance took place.</p>			

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
<p>The connection hose inside the 11kV Diesel Generator compound came off during the automatic fuel transfer pump start-up, releasing diesel to the bund and surrounding area. The diesel filling pipework is not horizontal to the 11 kV Emergency Diesel Generator which placed additional strain on the flexible hose connection, which has separated causing a diesel spill. No restraint/clamp on Pipework.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>The 11 kV Emergency Diesel Generator has been unloaded and shut down with the bowser emergency stop being activated, area taped off, site-wide e-mail sent, and production supervisor notified.</p> <p>On 25 November 2021 initial clean-up occurred including:</p> <ol style="list-style-type: none"> 1. Cleaning up inside the 11 kV Diesel Generator Building, mopping up and removing all diesel and residue from floors, bunds, and around Switchboard/Electrical Equipment 2. Cleaning up roadways and exterior to 11 kV Diesel Generator Building, including removal of any contaminated soil <p>Ground penetrating radar was undertaken to identify services and allow for further clean-up. Detailed contaminated site investigation was completed consisting of soil sampling (13-17 June 2022) and groundwater sampling (4-8 July 2022). Soil impacts do not pose an unacceptable risk based on the site's ongoing industrial use. Groundwater investigation has confirmed that hydrocarbon impacts to groundwater are minor and do not pose a risk to either human health or environmental receptors.</p> <p>A Series of engineering controls have been implemented:</p> <ol style="list-style-type: none"> 1. Diesel transfer pipework inside the 11kV Diesel Generator enclosure and 11kV diesel generator fuel line have been repaired. 2. Further inspection of fuel line has been conducted and improvements observed <ol style="list-style-type: none"> 2.1 New bracket and clamp installed on pipework inside diesel gen enclosure to eliminate movement. 2.2 New hose tails have been installed to pipework with double hose clamps onto flexible fuel hose coupling 3. Appropriate fluid level sensor has been installed inside the 11kv diesel generator bund which will provide early detection and warning of unacceptable fluid level in the diesel generator tank's bund. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 20 / 12 / 2021
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 22 / 12 / 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:	3.2.4	Date(s) of non-compliance:	20/05/2022 28/06/2022
Details of non-compliance:			
<u>RATA Failure of Emission point A4 (Stack D) and point A3 (Stack C) CEMS</u>			
Relative Accuracy Testing Audit (RATA) Report (received on 22 August 2022) from emission testing contractor has failed Stack C CEMS on the < / = 2% Bias criteria for NOx (2.6%) as required by the WA CEMS Code.			
Relative Accuracy Testing Audit (RATA) Report (received on 22 August 2022) from emission testing consultant has failed Stack D CEMS on the < / = 10% Relative Accuracy criteria for Oxygen (14%) as required by the WA CEMS Code.			
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 on the environment. Appendix 3: Map with the location of where the non-compliance took place.			
Cause (or suspected cause) of non-compliance:			
The cause is to be determined as the investigation continues.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The report reviewed for quality of data and discussed with Environmental Advisor and Environmental Manager. The consultant appointed to conduct monitoring is scheduled to arrive to site in October 2022 to repeat the tests on Stack C and Stack D, conducted respectively in June and May 2022.			
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 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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		15/09/2022	Date:
Seal (if signing under seal):			

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.

List of Appendices:

Appendix 1: Map with the location of where the non-compliance took place.
MUJ3 (Muja C) RH (Relative Humidity) valid data not available for greater than 90% of the measurement intervals in the calendar month September and October 2021

Appendix 2: Map with the location of where the non-compliance took place.
 Diesel Fuel Spill at the **11kV Emergency Generator**

Appendix 3: Map with the location of where the non-compliance took place.
 RATA Failure of **Emission point A4 (Stack D) and A3 (Stack C) CEMS**