



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 / 2022 to 30 / 06 / 2023		

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	2,729,430 MWh
Category 12: Screening, etc. of material	1,549,526 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)	82,593.71 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:	4.3.1	Date(s) of non-compliance:	11/04/2023
Details of non-compliance:			
<p><u>The NOx target exceedance ET1 form for Emission Point A3 was not submitted within 7 working days of the exceedance identification.</u></p> <p>During the preparation of the Annual Environmental Report for Muja Power Station, it has been determined that the NOx target exceedance ET1 form for Emission Point A3 has not been submitted within 7 working days of exceedance, identified on 31 March 2023.</p> <p>There were a number of NOx target exceedance ET1 forms submitted to DWER on 3, 4, and 6 April for exceedances that occurred on 25-28 March, 30 March, 1-2 April, and 5 April 2023. ET1 form for exceedance that occurred on 31 March has been missed. As per information provided in AER for 2022-2023, all above-dated exceedances were associated with imported coal quality, High-Pressure FW Heaters (HP5/HP6) being Out Of Service (OOS) due to a suspected leak in the HP6 FW Heater.</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 adverse environmental impact of non-compliance (administrative error). The incident occurred during an abnormal frequency of exceedances due to different coal used (imported and blended fuel) and High-Pressure FW Heaters (HP5/HP6) being Out Of Service</p> <p>Appendix 1: Map of the location of the emission reference point.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The high number of subsequent exceedances for the same emission point. Exceedance has been investigated and documentation completed. One of the forms (exceedance on 31 March) has been missed during submission via email. Constrained resources were a contributing factor. Synergy has commenced the recruitment of additional environmental resource for the site.</p>			

Section E – Details of non-compliance with licence condition	
An incident has been created in the Internal Incident Reporting System following an exceedance occurring.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: Unit 6 DCS Boiler Automatic Control, imported coal blend being delivered at Unit 6 Bunkers and Plant Operating Instructions have been reviewed.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 17 / 08 / 2023

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	Date(s) of non-compliance:	22/08/2022
Details of non-compliance:			
<u>Stage D East Fuel Oil (FO) Transfer Pump failure (F60 Fuel Oil Tank area) occurred on hardstand</u>			
The Stage D East Fuel Oil Transfer Pump has tripped on overcurrent due to the pump mechanical internals failing causing rupture of the external pump casing releasing fuel oil into the Stage D Transfer Pump Bund, Stage CD Main Oil Tank Bund, and Triple Oil Interceptor.			
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.			
After an initial investigation, it was observed that the fuel oil spill had not escaped the bunded area and was contained, with no release to the environment.			
Sampling of the groundwater wells has been conducted to gain an assessment of the impact. A total of 16 soil validation samples have been assessed by the external laboratory. There was no visual/textural/olfactory evidence of impact identified beyond 50mm of the ground surface, in most cases there were only a few millimeters of residual oil staining.			
Three groundwater monitoring wells were sampled, where no free product was identified during groundwater gauging.			
Surface water samples were collected at the inlet & and outlet points of the West End Trap.			

Section E – Details of non-compliance with licence condition	
<p>Outcomes of laboratory assessment have determined that the residual environmental risks are very low.</p> <p>Appendix 2: Map with the location of where the non-compliance took place.</p>	
Cause (or suspected cause) of non-compliance:	
<p>Tri-rotor assembly has catastrophically failed with both slave rotors found in cracked and broken condition along with the external casing being damaged.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Following the pump mechanical internals failure, the Operations Team investigated the leak and isolated the discharge and suction valves.</p> <p>Sampling of the groundwater wells has been conducted to gain an assessment of the impact.</p> <p>Suction and discharge valves were closed at the time when the leak was detected.</p> <p>An early leak detection system in the form of a bund-level switch was investigated and installed to alert operators in the event of a FO leak at the transfer station.</p> <p>Routine tasks and Plant Operating Instructions (POI) for checking and emptying the triple oil separator have been reviewed.</p> <p>Visual inspection and vibration analysis on the stage C transfer pump has been performed (other pumps were inspected for similar defects).</p> <p>The bund drain valve has been checked and confirmed in the normal, closed position.</p> <p>The site Environmental Advisor has been notified of the incident. The incident has been reported internally to the Environmental Manager, Environmental Operations Lead, and externally to DWER and DMIRS.</p>	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 23 / 08 / 2022

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:	1.2.3	Date(s) of non-compliance:	20/07/2022
Details of non-compliance:			
<p><u>Clay silt carry over from the northern side of Fly Ash Dam (FAD) Cell 1 buttress wall works and outside of the fence line onto the firebreak and low-lying undergrowth</u></p> <p>It was identified late Wednesday 20 July 2022 that the external windrow on the lower fly ash dam road had been breached by silt material wash off from the northern side of the Fly Ash Dam (FAD) Cell 1 buttress wall. This has resulted in fresh surface water, clay, and silt material being released onto the fire break road and low-lying section of the neighbouring state forest.</p> <p>This has been noted as an external complaint from DBCA as presented in the Annual Report (AER).</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 breach was located approximately midway along the clay windrow of Cell 1 of the FAD. An aerial of the area impacted by the incident is included in Appendix 3.</p> <p>Based on leachate and the sampling analytical results, it was determined that the released water and material did not pose a risk to environmental receptors.</p> <p>Synergy communicated the analysis results with DWER on 15 September 2022.</p> <p>Appendix 3: Map with the location of where the non-compliance took place.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Extreme weather observations with 2 weeks of consistent precipitation prior to the incident occurrence on 20 July 2022. (Significant rainfall from the 10th of July to the 20th July)</p> <p>The absence of a toe drain during construction has been determined as a contributory factor.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The site has been inspected by the Projects, Operations, and Environmental teams on 21 July 2022.</p> <p>On the same day, remedial actions have been undertaken by Synergy:</p> <ul style="list-style-type: none"> • discharged water/silt material samples taken for external laboratory analysis, • increased monitoring of the area with ongoing daily inspections 			

Section E – Details of non-compliance with licence condition

- removal of excess water from the impacted area and cleaning up the clay site on the fire break road following the silt drying out.

On 21 July 2022 site Environmental Officer notified DWER’s Pollution Watch department of the incident via email and included a copy of Synergy’s Incident Notification form. Following the notification of the incident DWER’s Pollution Response Environmental Officer requested that additional laboratory analysis of a suite of metals be undertaken.

A second sampling event was undertaken on 11 August 2022.

Sampling consisted of a collection of six samples of the clay/silt material that had washed into the State Forest vegetated area and three background soil samples from an unimpacted area. Sampling analytical results have been presented in the above section of the AACR (*actual or suspected environmental impact of the non-compliance?*)

The toe drain has been installed as identified as a contributing factor.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

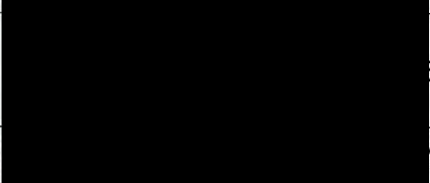
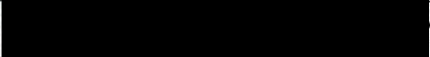
Reported to DWER in writing

Date: 21 / 07 / 2022

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:	EGM Thermal Growth	Position:	
Date:	6/9/2023	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 of the location of the emission reference point.
Administrative non-compliance for Muja Emission point A3
- Appendix 2: Map with the location of where the non-compliance took place.
**Stage D East Fuel Oil (FO) Transfer Pump failure
(F60 Fuel Oil Tank area)**
- Appendix 3: Map with the location of where the non-compliance took place.
Northern side of the Fly Ash Dam (FAD) Cell 1 buttress wall.