



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:	L5089/1989/9	Licence file number:	2010/004609
Licence holder name:	Kwinana Chlor Alkali Pty. Ltd.		
Trading as:	Kwinana Chlor Alkali Pty. Ltd.		
ACN:	130 483 395		
Registered business address:	Pt Lot 22 on Diagram 88339 Mason Road (Tronox Site), Kwinana Beach, WA, 6167		
Reporting period:	01/05/2023 to 30/04/2024		

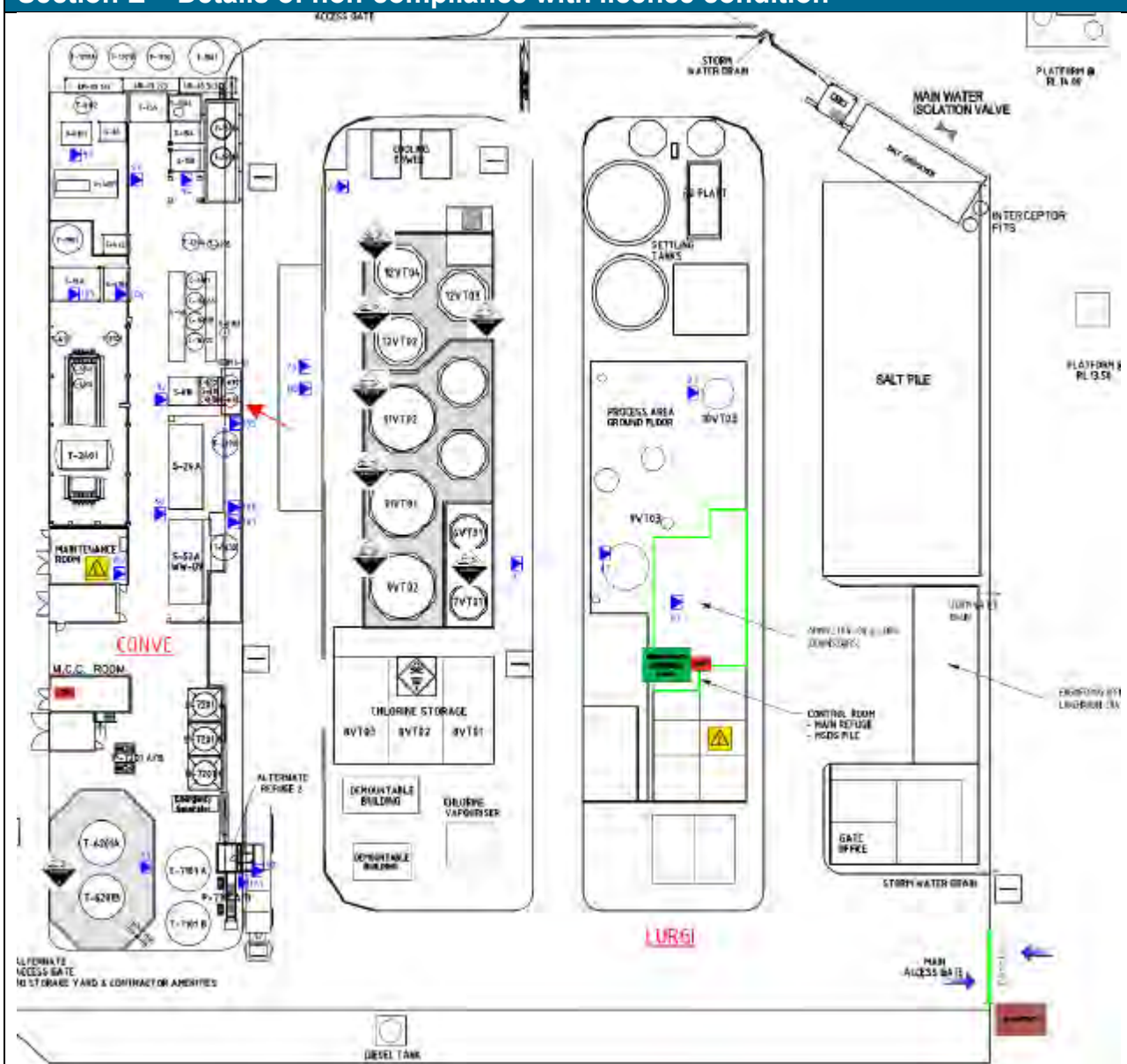
Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">section C;section D (if required); andsign the 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; andsign 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 31 – Chemical Manufacturing	Chlorine 29,858mt – Caustic 34,839mt

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

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. Unauthorised discharge	Date(s) of non-compliance:	11/06/2023
Details of non-compliance:			
<ul style="list-style-type: none"> On Sunday 11/06/2023 at 9 a.m. KCA lost power to the Conve plant and all drives in the field This resulted in Conve plant trip which stopped chlorine production immediately All chlorine in the pipework was purged to the scrubber unit however the scrubber pump was off due to power failure The backup scrubber pump (powered by Nitrogen) kicked in and started circulation of caustic liquor through the scrubber column immediately Given reduced flow (provided by the backup nitrogen pump) through the scrubber column, <u>intermittent chlorine release from the stack occurred</u> No onsite or offsite impact reported upon the minor chlorine release At the same time, fire alarm in the Conve MCC room was activated E&I technician was onsite for other jobs who went to the MCC room and started fault finding straightaway Upon investigation they found that there was an arc flash event in the cubicle for P-1802 (Conve dechlorination pump) which resulted in losing control power to the MCC and ultimately loss of mains power <u>from</u> the MCC to all field drives Mains power <u>to</u> the MCC was not affected therefore there wasn't any permissive for the Conve backup Diesel generator to kick in E&I technician managed to reinstate the control power supply to the MCC and operations team could restart all drives The period between losing and restoring power supply to the MCC was less than 10 minutes Conve plant left off for further investigations and in preparation for planned shutdown on Monday 12th June 			
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>			
No discernible environmental impact and chlorine release dispersed onsite.			
In the photo below, the Red arrow shows the location of the Conve stack.			

Section E – Details of non-compliance with licence condition



Cause (or suspected cause) of non-compliance:

- The root cause of the incident is attributed to a hot joint on the contactor termination in the MCC cell, ultimately leading to a breakdown of insulation and arc forming between phases
- This fault caused an arc flash event whereby an electrical explosion occurs creating a cloud of toxic gasses, molten metal, pressure waves and extreme heat
- During the arc flash event large amounts of energy was released causing electrical protection devices to operate, tripping multiple circuit breakers including the overall control power supply

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

- Damaged MCC module was repaired/rebuilt
- Thermographic inspection of all Conve MCC modules was completed by 3rd party contractor
- 7 extra hot joints found and repaired
- Thermographic inspection PM was created for all MCC modules at Conve and Lurgi plants

Section E – Details of non-compliance with licence condition	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 12/06/2023
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 15/06/2023

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:	CEO & Managing Director	Position:	Company Secretary
Date:	18th June 2024	Date:	18th June 2024
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.