



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:	L5366/1972/14	Licence file number:	
Licence holder name:	Electricity Generation and Retail Corporation		
Trading as:	Synergy		
ACN:	58 673 830 106		
Registered business address:	Forrest Centre 219 St Georges Terrace Perth WA 6000		
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	1,070 GWh
Category 61: Liquid waste facility	13,183 m ³
Category 73: Bulk storage of chemicals	10 m ³

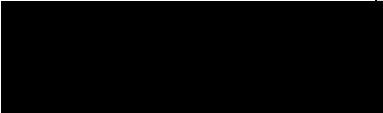

Section D – Statement of actual Part 2 waste discharge quantity			
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.			
Prescribed premises category	Actual Part 2 waste discharge quantity		
Section E – Details of non-compliance with 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:	21.	Date(s) of non-compliance:	01/12/2022 – 01/02/2023
Details of non-compliance:			
At the end of the 2022 – 2023 reporting period, the percentage availability of the Stage C outlet Chlorine Analyser was calculated to be 93%. Condition 21. of the Kwinana PS environmental Licence requires continuous monitoring availability to be ≥95% for the preceding 12 months.			
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> <ul style="list-style-type: none"> No impact to the environment is expected due to highly unlikely exceedance of chlorine concentration limit during normal operations. Operational data during the failure period was reviewed and is considered to be 'normal'. Fortnightly discharge monitoring during the analyser failure period showed undetected or very low chlorine levels in samples tested. Inlet chlorine analyser data does not show elevated concentrations going through the system and due to the nature of the process, there is no expected increase or build-up of chlorine concentration once discharged. Refer to Attachment A. for site map including discharge point and chlorine analyser location 			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> Algae/Debris blockage of the inlet sample line not allowing consistent flow of canal discharge water in the analyser and essentially “flat-lining” the data. This type of error was not automatically picked up by software alarms as the analyser was still generating data. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> ICAM into the incident to identify contributing factors. Review and improvements made to the servicing regime, increased to weekly instead of the OEM recommendation of monthly. Review and improvements made to analyser alarms to capture abnormal events that may require investigation. 			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	

Section E – Details of non-compliance with Licence condition			
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 25/01/2023 & 07/02/2023	
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.	Date(s) of non-compliance:	22/09/2022
Details of non-compliance:			
<p>During a routine inspection in September 2022, it was found that the overflow pond located on the premises had its liner detached on the western side of the pond.</p> <p>This was reported to DWER as a non-compliance as the previous version of the Licence (21/09/2021) stated: Table 1 of condition 1. Requires that each of the 3x Storage Dams “must have an intact HDPE liner”.</p> <p>The Licence was amended during January 2023 to allow for repair and maintenance of the liner.</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> <ul style="list-style-type: none"> No known environmental impact associated with the non-compliance. The overflow pond had not been discharged into for a significant period. Water in the overflow pond was rainwater from the prior winter months and the water line was below the point where the HDPE liner separated. Refer to Attachment A. for Map of Overflow Pond 			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> Potential cause was stresses on liner that led to liner detaching. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> Licence amendment was completed and amended license issued 09/01/2023 which included that the OWS overflow pond must have intact HDPE liner except during planned repair or maintenance (Condition 1 Table 1). Liner temporarily repaired until an improved solution could be implemented. The overflow pond liner was replaced in August 2023. 			
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: 30/09/2022	

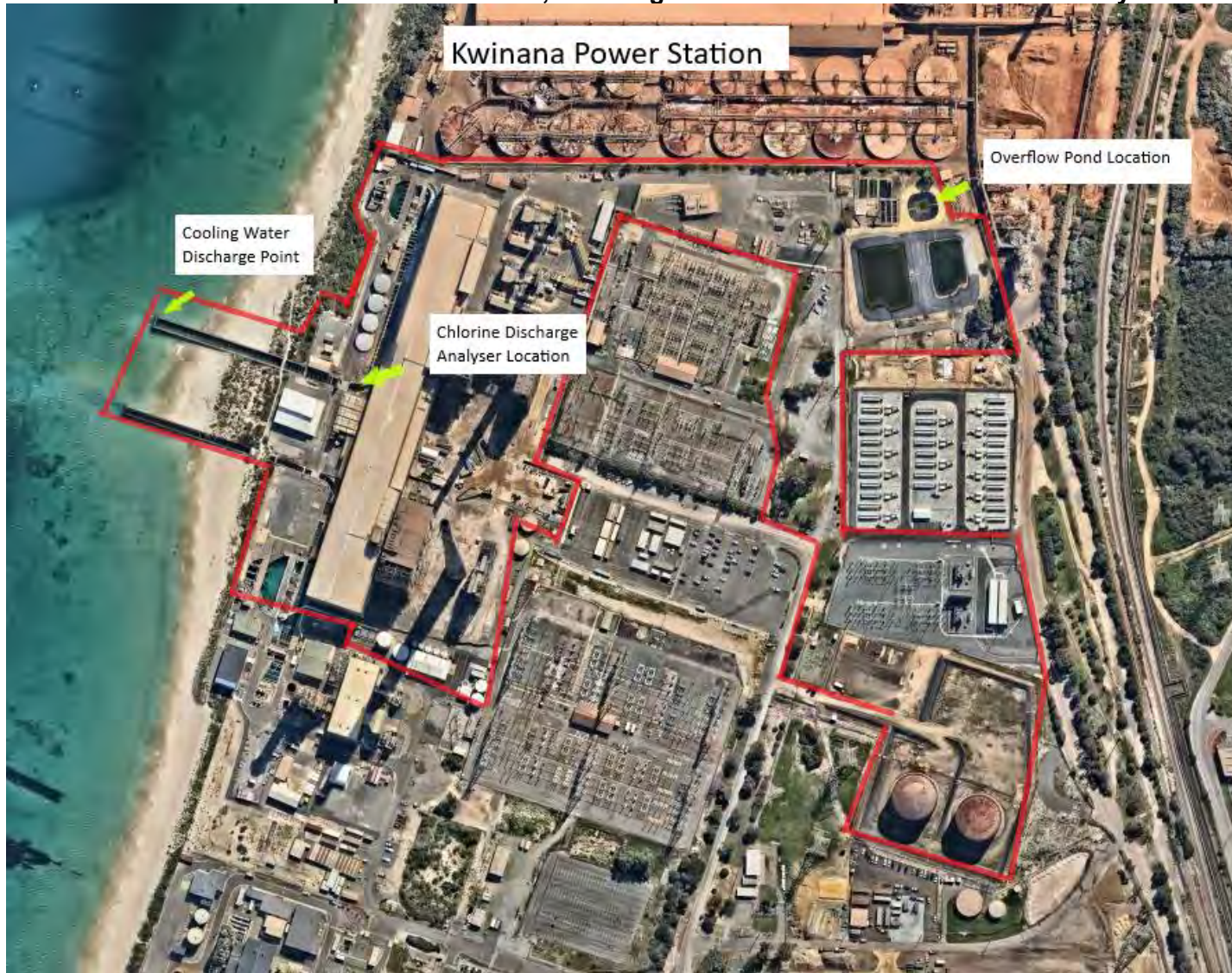
Section F – Declaration

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:	Head of Gas Generation	Position:	
Date:	14/09/2023	Date:	
Seal (if signing under seal):			

Attachment A. Kwinana Power Station Site Map: Overflow Pond, Discharge Point and Location of Chlorine Analyser



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.