



## 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](mailto: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:	L5938/1967/12	Licence file number:	
Licence holder name:	BP Refinery (Kwinana) Pty Ltd		
Trading as:			
ACN:	008 689 763		
Registered business address:	BP Refinery Kwinana Mason Road KWINANA BEACH WA 6167 (Legal description: Lot 18 on Plan 17311)		
Reporting period:	01/01/2023 to 31/12/2023		

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"><li>section C; &amp; section D (if required); and sign the declaration in Section F.</li></ul>
<input type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>section C; &amp; section D (if required); section E; and sign the declaration in Section F.</li></ul>

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 61: Liquid waste facility	123.46 T of oily water treated from external bp pipelines and terminals.
Category 73: Bulk storage of liquid chemicals	1,022,300 kL of liquid bulk storage.
Category 81: Metal coating	1,680 L of paint used.
Category 87: Fuel burning in a boiler for steam	1,598,904 kg of natural gas burnt in steam boilers.

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 61: Liquid waste facility	123.46 T of oily water treated from external bp pipelines and terminals.
Effluent to SDOOL	294.92 ML of treated effluent discharged to SDOOL.

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:	9	Date(s) of non-compliance:	27/03, 03/04, 01/05 and 8/5/2023
Details of non-compliance:			
<p>Four occasions where BOD and TSS were not sampled twice per week (Mon to Sun).</p> <p>This occurred for four weeks starting Monday 27 March, 3 April, 1 May and 8 May 2023.</p> <p>The BP Kwinana wastewater treatment plant sampling management run by non operated joint venture (NOJV) 3<sup>rd</sup> party operator ATOM took an incorrect interpretation of ‘week’ as to mean ‘every 7 days’ not ‘Mon to Sun’ as defined by DWER.</p> <p>The licence requires that for weeks where there was <math>\geq</math> two days of discharge, twice weekly testing of BOD and TSS is required. DWER defines a week as Monday to Sunday.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The environmental impact of the non-compliance is considered to be insignificant.</p> <p>For the weeks in question the wastewater treatment plant was in normal operating conditions and stable at all times. It is considered highly unlikely the quality of final effluent would vary significantly in the period when no sampling took place. Final effluent quality discharging to SDOOL was consistent and well within the licence discharge limits (Condition 7) for each daily composite sample collected for each non-compliant week 27-30 March, 4-9 April, 1-3 May and 12-14 May 2023. For all samples between 27 March to 14 May 2023, BOD was below the laboratory LOR of 5mg/L and TSS daily concentrations ranged from 1.5 to 7.0 mg/L. In all cases this is well below the licensed monthly avg conc. limit of 25 mg/L BOD and 60 mg/L TSS.</p>			
Cause (or suspected cause) of non-compliance:			
<p>bp had provided its guidance and expectations regarding WWTP sampling to ATOM including provision of the <i>bp WWTP sampling procedure</i> which includes a definition of week as Mon to Sun.</p> <p>Change in NOVP operator ATOM site personnel administering COC process was the main cause of the non-compliance. New staff incorrectly interpreted the definition of ‘week’.</p> <p>Contributing factors include: the complexity of the licence sampling regime three types of COCs (analyte testing frequency ranging from daily to twice a week to weekly); intermittent discharge each week; 3<sup>rd</sup> party laboratory not open on weekends, the bp licence omitting the definition of a ‘week’ which has allowed an incorrect interpretation by the NOVP operator ATOM.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>bp notified ATOM of potential non-compliance on 21 June 2023. ATOM responded querying the definition the same day. bp notified ATOM of confirmed non-compliance on 23 June 2023.</p> <p>As part of the notifications, ATOM immediately communicated to local ATOM staff administering the sampling schedule of the requirement to sample BOD/TSS twice per week Mon to Sun (except where flows are &lt;2 days) to prevent future non compliances.</p>			

**Section E – Details of non-compliance with licence condition**

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /


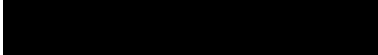
Reported to DWER in writing

Date: 14/02/2024 at time of issuing this report

**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 particular<sup>1</sup>.

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

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Kwinana Energy Hub Manager	Position:	
Date:	February 14, 2024	Date:	
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.