



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details			
Licence number:	L8026/2004/6	Licence file number:	2010/10534
Licence holder:	RATCH –Australia Kemerton Pty Ltd		
Trading as:			
ACN:	106 619 112		
Registered address:	Level 7 111 Pacific Highway North Sydney NSW 2060		
Reporting period:	1 / 11 / 2019 to 31 / 10 / 2020		

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 at 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
52	90,536 MWh's

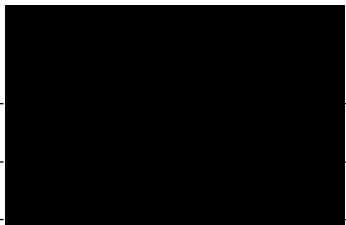
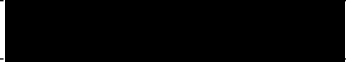
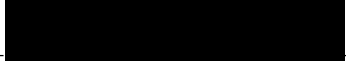
Section D – Statement of Actual Part 2 Waste Discharge Quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
NA	NA

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:	3.2.1	Date(s) of non-compliance:	5 th -14 th Oct 2020
Details of non-compliance:			
<p>Condition 3.2.1 requires test method of “stoichiometric calculation” for Sulfur Oxides emissions during monitor testing of air emissions.</p> <p>During the air emission testing program completed during the period 5th to 14th October 2020, the test method used to determine Sulfur Oxides emissions was USEPA test method 6C “Determination Sulfur Dioxide emissions from stationary sources (instrumental analyser procedure)”.</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>			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
<p>Selection of USEPA test method 6C “Determination Sulfur Dioxide emissions from stationary sources (instrumental analyser procedure)” for Sulfur Oxides is suitable and aligns with USEPA 20 – Determination of Nitrogen Oxides, Sulfur Dioxide and Diluent Emissions from stationary gas turbines.</p> <p>Our selected air emissions testing company is accredited for the USEPA 6C method and suggest the ‘instrumental analyser method 6C to be the current industry best / preferred practice for emission testing. Additionally, the USEPA 6C test method is a sub method to USEPA 20 and hence the ‘instrumental analyser performing the air emissions for the other required parameters was conducting all the required emissions sampling and analyzing.</p> <p>Hence the use of USEPA test method 6C was an effective and suitable alternative method for determining Sulfur Dioxide emissions than the listed stoichiometric calculation method.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Presently the air emission test program to completed approximately every 5 years. A licence amendment application will be submitted to request the USEPA 6C test method for determining Sulfur Dioxide to be added to current licence conditions.			
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:	19/01/2021	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.