



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:	L8780/2013/1	Licence file number:	2013/003894
Licence holder name:	APT Parmelia Pty Ltd		
Trading as:	APA Group		
ACN:	078 902 397		
Registered business address:	Level 25 HSBC Building 580 George Street SYDNEY NSW 2000		
Reporting period:	01 / 04 / 2023 to 31 / 03 / 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); 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
10	277,849 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
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:	10	Date(s) of non-compliance:	December 2023
Details of non-compliance:			
<p>Condition 10: <i>The licence holder must ensure that sampling required by condition 9 is undertaken at sampling locations in accordance with the current version of AS 4323.1.</i></p> <p>APA had completed a rectification project to extend the stacks on Compressor 1 and Compressor 2 to achieve compliance with AS 4323.1:1995. During the FY22 reporting period, APA was compliant with AS 4323.1 (Refer to FY22 AACR for details).</p> <p>However, soon after APA had achieved compliance, AS 4323.2021 was updated (no notification from external authorities) with new definitions of what is considered 'conforming'. The 2023 Ektimo emissions monitoring report (Report number R015724) states that the sampling plans for Compressor 1, 2 and the Regeneration Heater is non-conforming, due to the downstream disturbance being <1D from the sampling plane and the sampling plane being too near to the upstream disturbance but is greater than or equal to 2D. In the original version of AS 4323.1, APA was compliant with this this definition.</p>			
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.			
No actual or suspected environmental impact occurred by the non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Changes to requirements of AS 4323.1 (second edition) were published post installation and post rectification works.</p> <p>The sampling plane for Compressor 1, 2 and the Regeneration Heater is deemed to be non-conforming due to the following:</p> <ul style="list-style-type: none"> - The downstream disturbance is <1D from the sampling plan - The sampling plan is too near to the upstream disturbance but is greater than or equal to 2D 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>To ensure accuracy of results when 2023 sampling was undertaken, the sampling probes were inserted an adequate distance down the stack exit to guarantee no dilution from the ambient air upon collection.</p> <p>APA has submitted an Application to Amend to DWER on the 7/09/2023 proposing to amend Condition 10 to align with another sampling method that will achieve the same intent/outcome as the AS 4323.2021. The application is currently in progress with DWER.</p>			
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: 06/12/2023
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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:	Regional Manager - Mondarra	Position:	
Date:	11/4/24	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.