ERM Power Limited

Neerabup Gas-fired Power Station

Compliance Assessment Report
Ministerial Statement 759

4 January 2021

59988-134,591

JBS&G Australia Pty Ltd T/A Strategen-JBS&G

www.jbsg.com.au

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1. Introduction

This report addresses the status and compliance of the Neerabup Gas-Fired Power Station with conditions in Ministerial Statement (MS) 759. This report has been prepared for the purpose of meeting the requirements of condition 4-1 of MS 759, which requires submission of an annual Compliance Assessment Report (CAR).

Appendix F of this report also addresses the status and compliance of the Neerabup Gas-Fired Power Station with the conditions of various environmental and planning approvals and has been prepared to meet a requirement of the "Banker's conditions" to submit an annual compliance report.

1.1 Project background

NewGen Neerabup Partnership (NewGen) is the Proponent for a proposal to construct and operate:

- a 330 megawatt open-cycle gas-turbine power station
- a 30 kilometre long gas pipeline and compressor station to transport natural gas from the Dampier to Bunbury Natural Gas Pipeline to the power station
- a 330 kilovolt electricity transmission line, approximately two kilometres long, to connect the power station to the Western Power Neerabup terminal substation.

The Minister for the Environment issued MS 759 on 21 January 2008, under Part IV of the *Environmental Protection Act 1986* (EP Act), enabling the proposal to be implemented. A number of subsequent environmental and planning approvals have also been granted.

The power station is located at Neerabup, approximately 30 km north of Perth. The power station provides additional power into the South West Interconnected System (SWIS) during times of peak demand.

NewGen led the development and project financing for the Neerabup power station. ERM Power was the project and construction manager and is currently the operator of the facility.

2. Current status

Construction of the power station, gas pipeline and transmission line was completed in 2009, and the power station officially opened on 3 December 2009. The power station has been supplying power into the South-West Interconnected System (SWIS; as requested by Synergy) since that time.

The 330-kilovolt electricity transmission line was handed over to Western Power on 11 March 2010 and was officially published in the WA Government Gazette on 19 March 2010.

NewGen remains the proponent of the Gas-Fired Power Station, transmission line and natural gas pipeline. ERM Power is the operator/manager of the power station and pipeline facilities. Typically, power station operations consist of infrequent very short run durations. During the reporting period a total of 341 starts were recorded between the two units (11 and 12), with a 13.96% total operating capacity factor for the reporting financial year.

Previously the Stack Emission Management Plan (SEMP) was required under Conditions 4-3.2 and 4-3.3 of MS 759 to provide verifiable evidence of compliance with the procedures. Currently the intent is to remove the requirement for the SEMP within MS 759 under Section 46 and capture it within a temporary licence amendment application. In June 2020 the application to remove the SEMP requirements was lodged, with recent draft conditions received. The removal of the SEMP will be captured in the 2020-2021 audit period.

3. Audit methodology

3.1 Audit plan

3.1.1 Purpose and scope

This CAR has been prepared for NewGen (the proponent) to fulfil the requirements of condition 4-1 of MS 759, issued for the Neerabup Gas-Fired Power Station proposal. Condition 4-1 requires the proponent to submit an annual CAR (on the previous twelve-month period) to the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) (previously the Office of the Environmental Protection Authority [OEPA]).

Condition 4-2 requires the report to address each element of an approved audit program and be in an acceptable format.

Condition 4-3 requires the report to:

1. Be endorsed by signature of the proponent's Chief Executive Officer or a person, approved in writing by the CEO, delegated to sign on behalf of the proponent's CEO.
2. State whether the proponent has complied with each condition and procedure contained in this statement.
3. Provide verifiable evidence of compliance with each condition and procedure contained in this statement.
4. State whether the proponent has complied with each key action contained in any environmental management plan or program required by this statement.
5. Provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by this statement.
6. Identify all non-compliances and non-conformances and describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance.
7. Review the effectiveness of all corrective and preventative actions taken.
8. Describe the state of implementation of the proposal.

Conditions 4-3.2 and 4-3.3 refer to complying with procedures contained in MS 759 and providing verifiable evidence of compliance with the procedures. MS 759 does not contain any procedures and these requirements are consequently not applicable to this audit.

Conditions 4-3.4 and 4-3.5 refer to conformance with key actions within any environmental management plan or program required by MS 759. The plans and programs required to be implemented are:

- Rehabilitation Management Plan (RMP)
- Stack Emissions Management Plan (SEMP)
- Greenhouse Gas Abatement Programme (GGAP).

Key implementation actions of the RMP have been completed and are no longer audited. The status of implementation of the SEMP and GGAP is provided in Appendix D and Appendix E, respectively.

In addition, a third-party annual compliance review is required to address Banker's conditions. The Banker's audit, presented in Appendix F, has been undertaken as part of this CAR; incorporating the MS, subsidiary management plans and additional environmental approvals including:

- operating licence L8356/2009/2
- groundwater licence GWL164093(3).

The audit period relevant to this CAR and Banker's audit is 1 July 2019 to 30 June 2020.

3.1.2 Methodology

The site inspection component of the audit was undertaken by Andrew Winzer (Principal Consultant, Strategen-JBS&G) on 18 November 2020 and included discussion and review of key documents with Bruno Lanciano, Neerabup Power Station Manager, ERM Power.

3.2 Audit terminology

The 'Status' field of the audit tables (refer to Appendix B - Appendix E) describes the implementation of actions and compliance with the Statement. This report has been prepared using guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each action (Table 3.1). The terminology in Table 3.1 has been applied to complete the status field of the audit tables given in Appendix B - Appendix E.

Table 3.1: Action implementation status

Status	Description
Compliant/conformant.	Implementation of the proposal has been carried out in accordance with requirements of the audit element.
Completed.	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage.	The requirements of the audit element were not triggered during the reporting period.
Potentially non-compliant/Potentially non-conformant.	Possible or likely failure to meet the requirements of the audit element.
In process.	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.
Not audited.	Unable to be audited.

Source: Adapted from OEPA (2012a, 2012b, 2012c and 2012d) – note that the 'Not audited' status has been added for items that were unable to be audited.

4. Audit results

4.1 Compliance with conditions

A signed Statement of Compliance is provided in Appendix A.

The results of the audit for MS 759 are presented in Appendix B.

Condition 1-1 of MS 759 requires implementation of the proposal as documented in Schedule 1 and Schedule 2 of MS 759. The results of the audit of implementation of the key characteristics contained in Schedule 1 are outlined in Appendix C. Schedule 2 has been completed as discussed in Appendix C item 759 M10.1.

Condition 4-3 requires each key action contained in any management plan/program to be audited. The results of the audit of key actions in the SEMP and GGAP are outlined in Appendix D and Appendix E.

Results of the audit of key actions of the Banker's audit including the operating licence L8356/2009/2 and groundwater licence GWL164093(3) are outlined in Appendix F. A summary of audit findings against each approvals instrument is provided below.

4.2 Compliance with conditions of MS 759

The audit addressed 39 conditions; Neerabup Power Station was found to be potentially non-compliant with one condition of MS 759, with:

- Twenty-four conditions assessed as complete
- Eleven conditions assessed as compliant/conformant (during this audit period)
- Three conditions assessed as not required at this stage (during this audit period).
- One condition assessed as potentially non-compliant (during this audit period)

4.3 Compliance with conditions of Schedule 1 of MS 759

The audit addressed 32 conditions; Neerabup Power Station was found to be fully compliant with MS 759, with:

- Twenty conditions assessed as compliant/conformant (during this audit period)
- Ten conditions assessed as complete
- Two conditions assessed as not required at this stage (during this audit period)
- No conditions assessed as potentially non-compliant (during this audit period)

4.4 Compliance with conditions of the Stack Emissions Management Plan Rev 2.0

The audit addressed 5 conditions; Neerabup Power Station was found to be potentially non-compliant with one condition of the SEMP, with:

- Three conditions assessed as compliant/conformant (during this audit period)
- One condition assessed as complete
- One condition assessed as potentially non-compliant (during this audit period)

4.5 Compliance with conditions of the Greenhouse Gas Abatement Programme

The audit addressed 7 conditions; Neerabup Power Station was found to be potentially non-compliant with one condition of the GGAP, with:

- Four conditions assessed as compliant/conformant (during this audit period)

- Two condition assessed as complete
- One condition assessed as potentially non-compliant (during this audit period)

Environmental monitoring

A range of monitoring programs have been undertaken during the audit period, as required by the various management plans and licences. Monitoring includes:

- air emissions monitoring in accordance with the Stack Emissions Management Plan (SEMP) and operating licence administered by DWER (previously Department of Environment Regulation [DER])
- groundwater monitoring in accordance with the operating licence and the abstraction licence administered by DWER
- greenhouse gas emissions monitoring and reporting in accordance with National Greenhouse and Energy Reporting Scheme (NGERS).

5. Stakeholder consultation

ERM Power maintains a standard operating procedure for stakeholder management (NPS-PL-ROW-6), which requires that annual contact is made with each landowner or occupier to keep them informed of safety matters.

The following stakeholders were consulted during the audit period:

- adjacent land owners - Trandos farms
- pipeline land owners
- other Neerabup Industrial Estate neighbours
- WA Government Departments DWER and DMIRS, and Local Government, City of Wanneroo.

In addition, the SEMP covering the audit period was sent to DWER.

No complaints were received during the audit period between 1 July 2019 to 30 June 2020.

6. Limitations

Scope of services

This report ("the report") has been prepared by Strategen-JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and Strategen-JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

Reliance on data

In preparing the report, Strategen-JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ("the data"). Except as otherwise expressly stated in the report, Strategen-JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("conclusions") are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. Strategen-JBS&G has also not attempted to determine whether any material matter has been omitted from the data. Strategen-JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to Strategen-JBS&G. The making of any assumption does not imply that Strategen-JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. Strategen-JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law of Western Australia as at the date of this report.

Environmental conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

Strategen-JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by Strategen-JBS&G, and should not be relied upon by other parties, who should make their own enquiries.

7. References

Standards Australia, Australian Standard 1940 (2017) 'The Storage and Handling of Flammable and Combustible Liquids' (AS:1940), 2017.

Office of Environmental Protection Authority (OEPA) 2012a, Post Assessment Guideline for Preparing a Compliance Assessment Plan, OEPA, Perth, August 2012.

Office of Environmental Protection Authority (OEPA) 2012b, Post Assessment Guideline for Preparing an Audit Table, OEPA, Perth, August 2012.

Office of Environmental Protection Authority (OEPA) 2012c, Post Assessment Guideline for Making Information Publicly Available, OEPA, Perth, August 2012.

Office of Environmental Protection Authority (OEPA) 2012d, Post Assessment Guideline for Preparing a Compliance Assessment Report, OEPA, Perth, August 2012.

Woodman Environmental (Woodman) 2015, Neerabup Gas Pipeline Rehabilitation Completion Review, report prepared for Newgen Neerabup Partnership, 20 October 2015.

Appendix A Statement of Compliance

Statement of Compliance

1 Proposal and Proponent Details

Proposal Title	330 MW Gas-fired Power Station, Neerabup, City of Wanneroo
Statement Number	759
Proponent Name	NewGen Neerabup Pty Ltd
Proponent's Australian Company Number (where relevant)	126 965 722

2 Statement of Compliance Details

Reporting Period	*1/07/19* to *30/06/20*

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction		Construction		Operation	✓	Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	Appendix B
An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) *Post Assessment Guideline for Preparing an Audit Table*, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)		Yes (please proceed to Section 4)	✓

3 Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Was the implementation condition or procedure non-compliant or potentially non-compliant?
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
☐ Yes ☐ Reported to DWER verbally Date _____ ☐ Reported to DWER in writing Date _____	☐ No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
What was the cause(s) of the non-compliance or potential non-compliance?
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above inform ation may be provided as an attachment to this Statement of Compliance)

For additional non-compliance or potential non-compliance, please duplicate this page as required.

4 Proponent Declaration

I, ……Bruno Lanciano, Power Station Manager……., *(full name and position title)* declare that I am authorised on behalf of …NewGen Neerabup Pty Ltd……. (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:..... Date: 06/01/2020.....

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5 Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6 Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)
Department of Water and Environmental Regulation
Postal Address: Locked Bag 10
EAST PERTH WA 6892
Phone: (08) 6145 0800
Email: compliance@dwer.wa.gov.au

7 Post Assessment Guidelines and Forms

Post assessment documents can be found at www.epa.wa.gov.au in the following locations:

ATTACHMENT 1

Table 1 Compliance Status Terms

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: • ongoing requirements that have been met during the reporting period; and • requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: • audit elements have a finite period of application (e.g. construction activities, development of a document); • the action has been satisfactorily completed; and • the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	**The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.** The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).

Appendix B MS 759 audit table

Table B.1: Compliance with MS 759

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
759:M1.1 Implementation	Action Implement the proposal as documented and described in schedules 1 and 2 of Statement 759 subject to the conditions and procedures of this statement. Objective To avoid unforeseen or unassessed impacts.	Overall.		Refer to Appendix C. Refer to 759:M10.1.	Refer to Appendix C of this audit report which outlines compliance with Schedule 1. Refer to 759:M10.1 which addresses compliance with Schedule 2, which is considered completed.	Compliant
759:M2.1 Nominated proponent	Action The proponent for the time being nominated by the Minister for the Environment under sections 38(6) or 38(7) of the *Environmental Protection Act 1986* is responsible for the implementation of the proposal. Objective To ensure legal responsibility rests with the nominated proponent.	Overall.		N/A	NewGen Neerabup Partnership is still the proponent for the proposal.	Compliant
759:M2.2 Proponent nomination	Action Notify the Chief Executive Officer of the DEC (CEO) of any change of the name and address for the serving of notices or other correspondence within 30 days of such change. How Written notification. Objective To enable the DEC to maintain contact with the proponent.	Overall.	Within 30 days of change of contact details.	N/A	The contact name and address did not change during the audit period.	Compliant
759:M3.1 Commencement	Action The authorisation to implement the proposal provided for in Ministerial Statement 759 shall lapse and be void within five years after the date of this statement if the proposal to which this statement relates is not substantially commenced. How Commence substantial construction. Objective To define the period for which the authorisation to implement is valid.	Overall.	Prior to 21 January 2013.	R01 Annual Compliance Audit and Performance Review (Rev 0)	This item was assessed as Completed in the 2019 CAR.	Completed
759:M3.2 Commencement	Action Provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the 21 January 2013. How Written evidence. Objectives To ensure the CEO is notified that the project has substantially commenced.	Overall.	Prior to 21 January 2013.	R01 Annual Compliance Audit and Performance Review (Rev 0)	This item was assessed as Completed in the 2019 CAR.	Completed
759:M4.1 Compliance reporting	Action Submit to the CEO environmental compliance reports annually reporting on the previous twelve-month period, unless required by the CEO to report more frequently. How Written evidence addressing each element of the audit table. Objective To provide evidence that the proposal is being implemented as approved and that the relevant conditions and commitments are being met.	Overall.	Annually unless required by the CEO to report more frequently.	R01 Annual Compliance Audit and Performance Review (Rev 0) C_001_ERM Power_ Automatic reply: DWER Annual Environmental Monitoring report submission-_2018/2019_dated 14/08/2019	The 2019 Compliance Assessment Report (CAR) addressed the audit period from June 2018 to July 2019 and was submitted to DWER. ERM Power submitted the 2019 Compliance Assessment Report to the DWER on 12 December 2019.	Compliant
759:M4.2 Compliance Reporting - Audit Program	Action Prepare and submit an Audit Program in a format acceptable to the CEO.	Design.		R01 Annual Compliance Audit and Performance Review (Rev 0)	This item was assessed as Completed in the 2019 CAR.	Completed
759:M4.3 Compliance reporting	Action Submit compliance reports to CEO. How Environmental compliance reports shall: 1. Be endorsed by signature of the proponent's CEO or a person, approved in writing by the CEO, delegated to sign on behalf of the proponent's CEO. 2. State whether the proponent has complied with each condition and procedure contained in Statement 759.	Overall.	Annually, unless required by the CEO to report more frequently.	R01 Annual Compliance Audit and Performance Review (Rev 0) C_001_ERM Power_ Automatic reply: DWER Annual Environmental Monitoring report submission-_2018/2019_dated 14082019 C_002_ERM Power_2019-2020 SEMP Annual Compliance Report & Revised SEMP_DWER Email_03112020	The 2019 Compliance Assessment Report (CAR) addressed the audit period from June 2018 to July 2019 and was submitted to DWER. The 2020 SEMP Annual Compliance Report addressed the audit period from June 2019 to July 2020 and was submitted to DWER. NB: In terms of auditing key management actions within relevant management plans or programs; the RMP, SEMP and	Compliant

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
	3. Provide verifiable evidence of compliance with each condition and procedure contained in Statement 759. 4. State whether the proponent has complied with each key action contained in any environmental management plan or program required by Statement 759. 5. Provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by Statement 759. 6. Identify all non-compliances and non-conformances and describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance. 7. Review the effectiveness of all corrective and preventative actions taken. 8. Describe the state of implementation of the proposal. Objective To provide evidence that the proposal is being implemented as approved, and that the relevant conditions and commitments are being met.				GGAP are relevant. Only key actions from these plans were audited during this audit period (see Appendix D and Appendix E). Actions in the RMP have been deemed completed. In addition, actions identified in the licence to operate (L8356/2009/2) and groundwater licence (GWL164093(3)) have been assessed as part of the Banker's Audit (Appendix F).	
759:M4.4 Compliance reporting – public availability	Action Compliance reports shall be made publicly available in a manner approved by the CEO. How Carry out the following: 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website. Objective To ensure that the public is kept informed.	Overall.		Site inspection 18 November 2020. G_001_Website screenshot of CAR_16122020 https://ermpower.com.au/regulatory/generation_regulatory/ R_001_Strategen-JBS&G_Neerabup Power Station CAR 2019_0612020 https://3mqw712u5z9p32ge56hksn3o-wpengine.netdna-ssl.com/wp-content/uploads/2020/01/2018-2019-Neerabup-Environmental-Compliance-Performance-Review.pdf	The 2019 Compliance Assessment Report is available on the ERM Power website. Previous Compliance Assessment Reports state that OEPA (now DWER) accepts publication of documents on a website as publicly available and meeting the objective of ensuring the public is kept informed.	Compliant
759:M5.1 Performance review	Action Submit a Performance Review Report to the EPA every five years from the start of production. How The Performance Review Report shall address: 1. The major environmental issues associated with implementing the project; the environmental objectives for those issues; the methodologies used to achieve these; and the key indicators of environmental performance measured against those objectives. 2. The level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable. 3. Significant improvements gained in environmental management, including the use of external peer reviews. 4. Stakeholder and community consultation about environmental performance and the outcomes of that consultation, including a report of any on-going concerns being expressed. 5. The proposed environmental objectives over the next five years, including improvements in technology and management processes. Objective To provide evidence of environmental performance and to identify aspects that may require environmental improvements.	Overall.	Every 5 years from the start of production. 5 years from 3 December 2009.	R_002_Strategen-JBS&G_2018-2019-Neerabup Environmental-Compliance-Report-1_07082019 R_008_Strategen_2013-2014-Neerabup-Environmental-Compliance-Report_14122015	Operation of the power station commenced in December 2009. The first Performance Review Report was submitted to the OEPA as part of the 2013-2014 Compliance Assessment Report (R_008). The second Performance Review Report was submitted as part of the 2018-2019 Compliance Assessment Report (R_002).	Compliant
759:M5.2 Performance review – public availability	Action Performance Review reports shall be made publicly available in a manner approved by the CEO. How Carry out the following: 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website.	Overall.	Every 5 years after the start of construction. 5 years from 3 December 2009.	G_001_Website screenshot of CAR_16122020 https://3mqw712u5z9p32ge56hksn3o-wpengine.netdna-ssl.com/wp-content/uploads/2020/01/2018-2019-Neerabup-Environmental-Compliance-Performance-Review.pdf	The 2018-2019 Compliance Assessment Report - which contains the 5-year performance review is available on the ERM Power website.	Compliant

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
	Objectives To ensure that the public is kept informed.					
759:M6.1 Vegetation disturbance – boundaries	Action Prior to ground disturbing activities, clearly delineate on the ground the boundaries of the gas pipeline lateral and electricity transmission line easements and the area of disturbance outside the easements. How Boundaries are to be clearly visible for workers conducting disturbance activities. Objectives To ensure no disturbance occurs to vegetation outside the boundaries.	Design and construction.	Prior to ground-disturbing activities.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M6.2 Vegetation disturbance – exceedance of boundaries	Action Do not cause disturbance of vegetation outside the delineated gas pipeline lateral and electricity line easements, or the delineated area of disturbance outside the easements referred to in condition 6–1, unless authorised by the Minister for the Environment. How Clearing to only be within delineated areas. Objective To ensure no disturbance of vegetation outside the delineated boundaries.	Overall.		R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M6.3 Vegetation disturbance – environmentally sensitive areas	Action Do not cause or allow disturbance of vegetation outside a 20-metre wide gas pipeline lateral easement in environmentally sensitive areas, unless authorised by the Minister for the Environment. How Delineated areas within environmentally sensitive areas to be limited to a 20 m wide easement unless otherwise authorised by the Minister for the Environment. Objective To ensure no additional disturbance of vegetation occurs outside approved boundaries in environmentally sensitive areas.	Construction.	Within environmentally sensitive areas.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M7.1 Rehabilitation - Management Plan	Action Prior to ground disturbing activities prepare a Rehabilitation Management Plan in consultation with DEC, to the requirements of the Minister for Environment on advice of the EPA. How The Rehabilitation Management Plan shall address: 1. Weed management protocols. 2. Dieback management protocols. 3. Soil management protocols. 4. Rehabilitation completion criteria. 5. The need for propagule augmentation to achieve completion criteria. 6. With reference to, EPA Guidance Statement No. 6 - Rehabilitation of Terrestrial Ecosystems. Objective To ensure rehabilitation meets EPA requirements.	Design.	Prior to ground-disturbing activities.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M7.2 Rehabilitation – management period	Action Manage rehabilitation of the gas pipeline lateral and electricity transmission line easements until the rehabilitation completion criteria, referred to in condition 7-1, have been achieved. (Note: obligations under DoIR legislation mean the vehicular access track must be maintained and thus certain completion criteria may not be achievable within the access track). How In accordance with industry best practice environmental management and rehabilitation plan. Criteria established by M7.1 and EPA Guidance Statement No. 6 - Rehabilitation of Terrestrial Ecosystems. Objective To ensure rehabilitation meets EPA requirements.	Overall.		R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
759:M7.3 Rehabilitation Management Plan – review and revision	Action As required, review and revise the Rehabilitation Management Plan in consultation with DEC. How With reference to EPA Guidance Statement No. 6 – Rehabilitation of Terrestrial Ecosystems. Objective To ensure rehabilitation meets DEC and EPA requirements.	Overall.		R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M7.4 Rehabilitation Management Plan – implementation	Action Implement the Rehabilitation Management Plan required by M7.1 and subsequent revisions of the Rehabilitation Management Plan as required by M7.3. Objective To ensure rehabilitation planning and activities are implemented.	Overall.		R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M7.5 Rehabilitation Management Plan – public availability	Action The Rehabilitation Management Plan and subsequent revisions shall be made publicly available in a manner approved by the CEO. How Carry out the following (according to the recently approved Audit Program): 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website. Objective To ensure the public is kept informed.	Overall.	After approval of the Plan by Minister for Environment.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M8.1:1 Fauna – trench clearing	Action Trapped fauna within open trenches shall be cleared and recorded by a suitably trained fauna-clearing person no later than three hours after sunrise. The clearing and recording shall be repeated before sunset. (Note: "Fauna-clearing person" means an employee of the proponent whose responsibility it is to walk the open trench to recover and record fauna found within the trench.) How Employ a suitably trained fauna management person. Objective To minimise death or injury to fauna trapped in the open trenches.	Construction.	No later than three hours after sunrise and again before sunset.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M8.1:2 Fauna – trench clearing	Action Open trenches shall be cleared and recorded by a suitably trained fauna-clearing person no more than one hour prior to backfilling of trenches. How Implement Fauna Management Plan/Protocol. Objective To minimise death or injury to fauna trapped in open trenches.	Construction.	No more than one hour before backfilling of trenches.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M8.2 Fauna clearing – qualifications of fauna clearing person	Action The fauna-clearing person shall be experienced to the requirements of the DEC. How The fauna-clearing person will be experienced to the requirements of the DEC in: 1. Fauna identification, capture and handling (including venomous snakes). 2. Identification of tracks, scats, burrows and nests of conservation significant species. 3. Fauna vouchering. 4. Assessing injured fauna for suitability for release, rehabilitation or euthanasia. 5. Familiarity with the ecology of the species which may be encountered in order to be able to appropriately translocate fauna encountered. 6. Performing euthanasia. Objective To ensure fauna handling and assessment is of a high standard.	Construction.	Prior to trench construction and fauna handling.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
759:M8:3 Fauna – clearing person training	Action Ensure that basic fauna handling training is provided to fauna clearing persons who do not possess the skills and experience outlined in M8-2 prior to the fauna-clearing person commencing employment. How Fauna handling training course delivered to inexperienced staff. Objective To ensure fauna handling and assessment is of a high standard.	Design.	Prior to trench construction and fauna handling by inexperienced persons.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M8.4 Fauna – clearing person training	Action Fauna handling training as outlined in M8.3 shall be developed in consultation with the DEC. How In consultation with DEC. Objective To ensure best practice fauna handling and assessment.	Design.	Prior to fauna handling by inexperienced persons.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M8.5 Fauna – open trench length	Action Open trench lengths shall not exceed a length capable of being inspected and cleared by fauna clearing persons within the required times as set out in condition 8.1. Objective To minimise death or injury to fauna trapped in the open trenches.	Construction.	In areas where there are open trenches.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M8.6 Fauna – flooding of trench	Action Monitor weather forecasts through the Bureau of Meteorology and in the event of a weather forecast indicating rainfall sufficient to cause flooding of trenches or drowning of fauna trapped in trenches, in consultation with DEC, backfill all lengths of open trench with a potential to be flooded or cause drowning of fauna. How Monitor weather forecasts in areas where there are open trenches. Calculate rainfall level which could cause flooding of trenches or drowning of fauna. Consult with DEC where weather indicates potential flooding or drowning of fauna could occur as to whether backfilling of trenches needs to occur. Objective To minimise harm to fauna trapped in open trenches.	Construction.	In areas where there are open trenches.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M8.7:1 Fauna management – report	Action Produce a report on fauna management within the gas pipeline lateral easement at the completion of gas pipeline construction and provide report to the CEO no later than 14 days after the completion of the gas pipeline construction. How The Fauna Management Report shall include: 1. Details of all fauna inspections. 2. The number of fauna cleared from trenches. 3. Fauna interactions. 4. Fauna mortalities. 5. All actions taken. Objective To ensure that fauna management was carried out in accordance with conditions and, to understand project impacts on fauna and to further develop industry best practice fauna management.	Post-construction.	Provided to CEO no later than 14 days after the completion of gas pipeline construction.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M8.7:2 Fauna management report - publicly availability	Action Report on fauna management to be made publicly available in a manner approved by the CEO. How Carry out the following (according to the recently approved Audit Program): 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website.	Post-construction.	No later than 14 days after the completion of gas pipeline construction.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
	Objective To ensure the public is informed of project impacts on fauna.					
759 M9.1 Stack Emissions Report	Action Prior to submission of a works approval application, provide a report to the CEO for approval. How The report shall: 1. Confirm the engineering design details for the emission of gaseous and particulate pollutants, including stack heights, stack parameters, exit temperatures and exit velocities; and 2. Estimate the concentration of nitrogen oxides and other gaseous and particulate pollutants, under normal and worst-case conditions, including start-up and upset emissions. Objective To ensure that best available practicable and efficient technologies are being used and that stack emissions can be managed to below required environmental levels. Criteria With reference to the DEC Continuous Emission Monitoring System (CEMS) Code for Stationary Source Air Emissions.	Design.	Prior to submitting a works approval application.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M9.2 Stack emissions Management Plan	Action Prepare a Stack Emissions Management Plan to the requirements of the Minister for Environment at least three months prior to commencement of operations. How The Stack Emissions Management Plan shall include: 1. Proposed targets and standards. 2. A stack emissions monitoring programme, which includes nitrogen oxides and other gaseous and particulate pollutants. 3. Annual reporting. Objective To ensure that best available practicable and efficient technologies are used to minimise and monitor air emissions from the power station. Criteria With reference to the DEC Continuous Emission Monitoring System (CEMS) Code for Stationary Source Air Emissions.	Design.	At least three months prior to commencement of operations.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759 M9.3 Stack Emissions Management Plan – implementation	Action Implement the Stack Emissions Management Plan required by condition 9.2. Objective To ensure that best available practicable and efficient technologies are used to minimise and monitor air emissions from the power station.	Design.		Refer to Appendix D R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020	The approved updated SEMP (Rev 3.0) is being implemented (see Appendix D). No modifications were made to the plan during this audit period. The SEMP annual compliance report indicates that monitoring for all parameters outlined in Appendix D was undertaken for unit 11 and unit 12 on 4 November and 7 November 2020 accordingly. Of the five key actions, three were compliant, one was potentially non-compliant and one was complete.	Potentially non-compliant
759 M9.4 Stack Emissions Management Plan –publicly available	Action The Stack Emissions Management Plan required by condition 9.2 shall be made publicly available in a manner approved by the CEO. How Carry out the following (according to the recently approved Audit Program): 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website. Objective To ensure the public is kept informed.	Design.	Prior to commencement of operations.	G_001_Website Screenshot of Regulatory Reports_16122020 https://ermpower.com.au/wp-content/uploads/2020/11/2019-2020-SEMP-Annual-Compliance-Report.pdf	The SEMP is made publicly available on the ERM Power website, consistent with OEPA requirements for making documents available to the public. The updated SEMP is available on the ERM Power website.	Compliant

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
759 M10.1 Greenhouse Gas Abatement Programme – prepare	Action Prior to commencement of ground disturbing activities, prepare and submit a Greenhouse Gas Abatement Programme for approval by CEO. How The Greenhouse Gas Abatement Programme shall set out measures and processes to: 1. Ensure that the plant is designed and operated in a manner which achieves reductions in "greenhouse gas" emissions as far as practicable. 2. Provide for ongoing "greenhouse gas" emissions reductions over time. 3. Ensure that the total net "greenhouse gas" emissions and/or "greenhouse gas" emissions per unit of product from the project are minimised; and 4. Manage "greenhouse gas" emissions in accordance with the Framework Convention on Climate Change 1992, and consistent with the contemporary National Greenhouse Strategy as updated from time to time. Objective To manage greenhouse gas emissions to achieve ongoing reductions and minimise project emissions. Criteria Criteria set out in Schedule 2 of Statement 759 and on advice from the EPA. With reference to EPA Guidance Statement No. 12, Minimising Greenhouse Gas Emissions.	Design.	Prior to commencement of ground disturbing activities.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Complete
759 M10.2 Greenhouse Gas Abatement Programme – implementation	Action Implement the Greenhouse Gas Abatement Programme unless modifications are approved by the CEO. Objective To manage greenhouse gas emissions to achieve ongoing reductions and minimise project emissions.	Overall.	Prior to commencement of ground disturbing activities.	Refer to Appendix E Management advice 18 November 2020. Site inspection 18 November 2020.	The GGAP is being implemented (see Appendix E). No modifications have been made to the plan during the audit period. Of the seven key actions, four were conformant, two were complete, and one as potentially non-conformant.	Compliant
759 M10.3 Greenhouse Gas Abatement Programme – publicly available	Action Prior to commencement of ground disturbing activities, the Greenhouse Gas Abatement Programme required by condition 10.1 shall be made publicly available in a manner approved by the CEO. How Carry out the following (according to the recently approved Audit Program): 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website. Objective To ensure the public is kept informed.	Design.	Prior to commencement of ground disturbing activities.	G_001_Website Screenshot of Regulatory Reports_16122020 https://ermpower.com.au/wp-content/uploads/2013/08/Neerabup-Greenhouse-Gas-Abatement-Programme-1.pdf	The GGAP is made publicly available on the ERM Power website, consistent with DWER requirements for making documents regarding the proposal publicly available. The GGAP was available on the ERM Power website at the time of the audit.	Compliant
759:M11.1 Preliminary Decommissioning Plan – prepare	Action Prior to commencement of ground disturbing activities, prepare a Preliminary Decommissioning Plan for approval by the CEO. How The Plan shall describe the framework and strategies to ensure that the site is suitable for future land uses, and provides: 1. The rationale for the sitting and design of plant and infrastructure as relevant to environmental protection. 2. A conceptual description of the final landform at closure. 3. A plan for a care and maintenance phase. 4. Initial plans for the management of noxious materials. Objective To appropriately decommission the NewGen Neerabup 330 MW Gas Fired Power Station, Gas Pipeline and High Voltage Transmission Line in accordance with regulatory requirements and accepted best practice environmental management.	Design.	Prior to commencement of ground-disturbing activities.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
759:M11.2 Final Decommissioning Plan – prepare and submit	Action At least six months prior to the anticipated date of closure, or at a time approved by the EPA, submit a Final Decommissioning Plan designed to ensure that the site is suitable for future land uses for approval by the CEO.	Operation and Closure.	At least 6 months prior to anticipated closure.	Management advice 18 November 2020. Site inspection 18 November 2020.	The project life is approximately 30 years, with closure anticipated to occur in 2040.	Not required at this stage

Audit code Subject	Action How Objective Criteria	Phase	When/Where	Evidence	Comments	Status
	How The Final Decommissioning Plan shall set out procedures and measures for: 1. Removal or, if appropriate, retention of plant and infrastructure agreed in consultation with relevant stakeholders. 2. Rehabilitation of all disturbed areas to a standard suitable for the agreed new land use(s). 3. Identification of contaminated area, including provision of evidence of notification and proposed management measures to relevant statutory authorities. Objective To ensure that the site is left in an environmentally acceptable condition suitable for future land uses.					
759:M11.3 Final Decommissioning Plan – implementation	Action Implement the Final Decommissioning Plan until such time as the Minister for the Environment determines, on advice of the CEO, that decommissioning responsibilities have been fulfilled. Objective To ensure that the Final Decommissioning Plan is implemented.	Closure.	Until such time as the Minister determines that decommissioning responsibilities have been fulfilled.	Refer to 759:M11.2	Refer to 759:M11.2	Not required at this stage
759:M11.4 Final Decommissioning Plan – public availability	Action The Final Decommissioning Plan shall be made publicly available in a manner approved by the CEO. How Carry out the following: 1. Advertise the availability of the document in the 'Public Notices Section' of the local community newspaper. 2. Provide copies of the documentation to the DEC library (1 hard copy, 1 CD copy), local government public library (2 copies), JS Battye library (2 copies). 3. Post the document on the proponent's website. Objective To ensure the public is kept informed.	Overall.	After approval of Plan by CEO, and prior to implementation of Plan.	Refer to 759:M11.2	Refer to 759:M11.2	Not required at this stage

Appendix C MS 759 Schedule 1 audit table

Table C.1: Schedule 1 of MS 759 audit table

Element	Description	Evidence	Comments	Status
Project purpose:	To construct, operate and maintain a 330 MW power station and associated infrastructure.	Management advice 18 November 2020. Site inspection 18 November 2020. R_001_Strategen-JBS&G_Neerabup Power Station CAR 2019_06012020	Previous Compliance Assessment Reports noted that construction of the gas pipeline, transmission line and power station was completed in 2009. The power station was commissioned in December 2009, with operation and maintenance currently occurring. The operator advised that no changes have been made to the construction of the power station during the audit period and the auditors observed that this was the case.	Compliant
Project life:	30 years.	N/A.	No change, closure is anticipated to occur in 2040.	Not required at this stage
Power output:	330 MW (nominal).	Management advice 18 November 2020. R_001_Strategen-JBS&G_Neerabup Power Station CAR 2019_06012020	There have been no changes to the nominal power output for the power station. The operator advises that 330 MW is the default rating and represents a nominal rating. The station can produce 342 MW with additional controls as a maximum in peaking situations.	Compliant
Sent out electricity:	Approximately 867GWh/yr.	D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	Data for the 2019/20 financial year shows that sent out electricity was 419.24 GWh/yr.	Compliant
Thermal efficiency:	33.3% HHV at 25°C and 60% relative humidity.	Management advice 18 November 2020. D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	The operator configured the Supervisory Control and Data Acquisition (SCADA) system during July 2015 to provide real-time monitoring of thermal efficiency. These monitoring results provide more accurate calculation of thermal efficiency recorded during operation. Results from real-time monitoring recorded generator efficiency at approximately 29.96% at maximum power output from the generators.	Compliant
Plant operation:	Intermittent operation to suit demand – peak and shoulder periods.	Management advice 18 November 2020.	The operator advised that intermittent demand is so far associated with and limited to very hot or very cold days, low occurrences of other participant significant outages, low probability of high market prices and limited grid feeds (generation nomination) as requested by Synergy.	Compliant
Operating hours:	Approximately 2628 hours per year.	D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	The operating hours for the two units combined was 2,452 hours during the audit period.	Compliant
Capacity factor:	Approximately 30%.	R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020	Based upon 330.6 MW capacity, the capacity factor was 13.96% during the audit period.	Compliant
Power station footprint:	Site is 10 ha of cleared farming land of which approximately 4 ha is used for infrastructure.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Pipeline footprint:	Construction corridor 30 m wide over 30 km length. Approximately 30 ha of native vegetation to be cleared and rehabilitated after construction.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Transmission line footprint:	Approximately 400 m^2 of native vegetation for construction of each of seven single column power pole bases.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Fuel:				
• Type:	Natural gas.	Management advice 18 November 2020.	Natural gas is delivered from the Dampier to Bunbury Natural Gas Pipeline (DBNGP) to lateral that serves the station.	Compliant
• Source:	North-west Shelf.	Management advice 18 November 2020.	The supply of gas provided through the DBNGP is sourced from the North West Shelf, and supplemented from other gas fields en-route, and is controlled by the pipeline owner/operator (DBP).	Compliant
• Method of transport:	Dampier to Bunbury Natural Gas Pipeline and an approximately 30 km long gas pipeline lateral to the power station site.	Management advice 18 November 2020. Site inspection 18 November 2020.	Gas is delivered from DBNGP to lateral that serves the station. Auditors observed the gas yard and pipeline junction that services the power station.	Compliant
Major plant components				
Power station gas turbines:	Two 165 MW open-cycle gas turbines fitted with low NOx burners.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Number of stacks:	2.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Height of stacks:	35 m.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Stack diameter:	6 m.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Gas pipeline:	A dedicated lateral from the Dampier to Bunbury Natural Gas Pipeline of approximately 30 km length.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed

Element	Description	Evidence	Comments	Status
Compressor station:	Located on gas pipeline lateral and consists of two compressor units with only one unit in operation at any time.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Electricity transmission line:	330 kV line to Western Power Neerabup terminal substation – approximately 2 km long.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
Inputs				
Natural gas:	Approximately 11.2 PJ per year.	D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	A total of 5.00 PJ of natural gas per year was utilised during the audit period.	Compliant
Process water:	Approximately 15 ML per year from onsite bore.	R_006_ERM Power_2019-2020 Bore 1 and 2 Water meter use card_30062020 D_001_ERM Power_2019-2020_Schedule 1 calcs_Audit Info Neerabup Stats_Compliance_2020	Two bores are utilised on-site with a total water use of 33.85 ML used in the audit period: Bore 1 of 2: 3,181 kL/year. Bore 2 of 2: 30,669 kL/year. The Groundwater Licence (GWL 164093) states an abstraction volume limit of 100,000kL Abstraction volumes during this audit period equates to 33,850kL, within the permitted volume limit of the licence.	Compliant
Outputs				
Wastewater:	No discharge of wastewater.	Management advice 18 November 2020. Site inspection 18 November 2020.	There was no discharge of wastewater. The Reverse Osmosis plant minimises waste water collected in the evaporation ponds.	Compliant
Oxides of nitrogen (NOx):	380,000kg/yr (<25 ppmv @ 15% O_2).	R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020 R_005_NPI_WA1204 Emission Report 2019-2020_27102020	Both Unit 11 and 12 was recorded at 19 ppmv, which is below the limit specified. Using NPI techniques it is estimated that NOx emissions were 175,849.24 kg/yr.	Compliant
Particulates (PM10):	74,000kg/yr.	D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	PM10 was not included in stack testing. Using NPI techniques it is estimated that PM10 emissions were 14,005.95 kg/yr.	Compliant
Carbon monoxide (CO):	93,000kg/yr (<10 ppmv @ 15% O_2).	R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020 D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	Unit 11 was recorded at <1 ppmv and Unit 12 at <1 ppmv, which is below the limit specified. Using NPI techniques it is estimated that CO emissions were 32,560.2 kg/yr.	Compliant
Sulphur dioxide (SO2):	5,100 kg/yr.	Management advice 18 November 2020.	NA - Not tested for in the 2019-2020 stack test program, DER licence does not require this to be tested.	N/A
Direct greenhouse gas emissions:	Approximately 590,000 tonnes of CO_2-e per year.	R_009_Clean Energy Regulator_ NGERs S19 REPORT FY1920_041120	The direct greenhouse gas emissions were approximately 254,037 tonnes of CO_2-e for the audit period.	Compliant
Full fuel cycle greenhouse gas emissions:	Approximately 673,000 tonnes of CO_2-e per year.	R_009_Clean Energy Regulator_ NGERs S19 REPORT FY1920_041120	The full fuel cycle greenhouse gas emissions were approximately 255,954.61 tonnes of CO_2-e for the audit period.	Compliant
Greenhouse intensity:	Approximately 554kg of CO_2-e per MWh.	Management advice 18 November 2020. D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020	The greenhouse intensity recorded during the audit period was 610.52 kg of CO_2-e per MWh for the audit period which is within 10% of the 554 kg of CO_2-e per MWh. As reported last year, the Proponent has advised that typical operations through the reporting period involved infrequent very short duration runs (station capacity factor of 13.96 %, total of approximately 341 starts between the two units during the audit period). Management advised that whilst the proportion of time that Neerabup power station is 'online' increased from the previous reporting period, it is still considered very low. This operating trend tends to unfavourably skew the greenhouse intensity data per output due to the inherent inefficiency of the fast start-up cycle and short runs associated with a peak demand power station. The Proponent also notes that the heat rate degrades when the station is run at lower power output and the Proponent gets requests from the market to run at lower than maximum capacity output. As the future capacity factor of the power station increases, the ratio of starts to 'online' hours should improve with a corresponding reduction in greenhouse intensity.	Compliant
Noise:	Will comply with the Environmental Protection (Noise) Regulations 1997: • <30dB(A) at nearest residential property and • <65dB(A) at nearest industrial property.	Management advice 18 November 2020. D_003_ERM Power_NPS-REG-ECT-COMP External Complaints Register_15122020	No complaints were received during the audit period indicating that noise limits were within the required parameters.	Compliant

Appendix D Stack Emissions Management Plan Rev 2.0 (20 June 2013) audit table

Table D.1: Stack Emissions Management Plan Rev 2.0 (20 June 2013) audit table

Audit code	Action	Evidence	Comments	Status
SEMP1	The power station shall be designed and constructed to comply with the emission concentration targets specified in 5.1 (NOx – 25 ppmv; CO – 10 ppmv). The power station will utilise low NOx burners to ensure that emissions of oxides of nitrogen are minimised as far as is practicable.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2018_18122018	This item was assessed as Completed in the 2018 CAR.	Completed
SEMP2	The power station shall be maintained and operated in a proper and efficient manner and in accordance with the manufacturer's operation and maintenance manual to ensure compliance is achieved with the emission concentration targets specified in 5.1.	Management advice 18 November 2020. D_002_ERM Power_Neerabup Inspection Plan 2009-2032_291020	The proponent advised that the trigger item of number of starts is tracked within Neerabup Forecasted Inspection Plan 2009–2032, to indicate the appropriate timing of maintenance activities. During the 2020-21 reporting period it was brought to the Power Station Managers attention that the Siemens OEM schedule for minor inspections is 250 starts (+/- 10 starts) or 8,000 EOH whichever is earlier. Previous annual reports stated minor inspections were triggered at 250 starts (+/- 10%) which is incorrect. The most recent minor inspection, the third since operations began at the plant, occurred on the 26 and 29 of February 2020. At this time Unit 11 had accumulated 262 starts and Unit 12 accumulated 265 starts between the 2nd and 3rd minor inspection (outside OEM tolerance [OEM 250 starts +/- 10 starts]). It is noted that he "Minor inspections" are an "Inspection" only outage trigger to detect issues, rather than the scheduled maintenance overhaul or parts replacements that are scheduled at "Major Maintenance" triggers of which are not yet due, the minor inspections were conducted revealing no corrective action was required. The total number of starts recorded since the first minor inspection in 2014 is in accordance with the projected number of starts outlined in the Neerabup Forecasted Inspection Plan 2009–2032. The Neerabup Forecasted Inspection Plan 2009–2032 indicates that the next minor inspections are scheduled for June 2021 for both units. As outlined in SEMP 1 above, the specified emission concentration targets are being achieved.	Potentially non-compliant
SEMP3	Sampling and analysis of air pollutants, specified in Table 4 below, shall be undertaken and reported as provided by Section 4.2 of Australian Standard AS4323.1. The following list summarises the parameter and frequency of monitoring required by Table 4: • oxides of nitrogen (mg/m^3) – annually • carbon monoxide (mg/m^3) – annually • velocity, temperature and volumetric flow rate (m/s,˚C, m^3/s) - annually • moisture content (%) - annually • dry gas density, molecular weight (kg/m^3, g/gmol) - annually • oxygen (%) - annually.	R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020	The SEMP annual compliance report indicates that monitoring for all parameters outlined in Table 4 were undertaken for Unit 11 on 7 November 2019 and Unit 12 4 November 2019. Sampling and analysis of air pollutants are undertaken and reported in accordance with section 4.2 of Australian Standard AS4323.1.	Compliant
SEMP4	A complaints procedure shall be established to receive complaints from the community associated with air emissions from the power station. The power station operator shall investigate all complaints and, where the power station is found to be the cause of the incident, the operator shall take actions to ensure that the cause is rectified and implement measures to ensure that there is minimal risk of the incident recurring.	Management advice 18 November 2020. D_003_ERM Power_NPS-REG-ECT-COMP External Complaints Register_15122020	The operator has established and maintains a complaint register for the power station and pipeline. No complaints were received during the audit period.	Compliant
SEMP5	Annual internal audits and annual external audits will be conducted as specified in the Operational Environmental Management Plan. These audits will assess compliance with this SEMP.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2019_06012020 R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020 C_002_ERM Power_2019-2020 SEMP Annual Compliance Report & Revised SEMP_DWER Email_03112020 R_010_ERM Power_2019-2020 Internal Audits Neerabup Pipeline OEMP OSC SEMP_29102020 C_005_ERM Power_Annual Compliance Report for the July 2019-June 2020 period_06012020	The following audits and compliance reports were prepared by ERM which assessed compliance with the SEMP: • SEMP Annual Compliance Report submitted to DWER on 6 November 2020 • Compliance Assessment Report 2019-20 submitted to DWER on 27 August 2020 • Annual internal audit was performed on the 18 November 2020.	Compliant

Appendix E Greenhouse Gas abatement Programme audit table

Table E.1: Greenhouse Gas Abatement Programme audit table

Audit code	Action	Evidence	Comments	Status
GGAP1	Minimise/reduce energy use through the following: • routine monitoring of plant efficiency • operate plant at optimum efficiency in accordance with manufacturer's operation and maintenance.	Management advice 18 November 2020. D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020 D_002_ERM Power_Neerabup Inspection Plan 2009-2032_291020 D_005_ERM Power_GT11 Performance Tracking_2020 D_006_ERM Power_GT12 Performance Tracking_2020 D_008_ERM Power_GT11 Comp Perf tracking_2020 D_009_ERM Power_GT12 Comp Perf tracking_2020 R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020	As previously reported, it should be noted that a power station designed and operated to provide peak supply has an inherently lower operational efficiency due to the number of start-ups against operating times and the lower efficiency of running the power plant at low outputs. The operator advised that there are a number of factors that could potentially influence plant efficiency including fuel quality and age of the plant. Efficiency of the plant is generally expected to gradually decline over the life of the plant. Performance monitoring is undertaken for both units with monitoring results from efficiency tests demonstrating that both turbines are operating at higher than 29.96%. The operator advised that the trigger item of number of starts is tracked within Neerabup Forecasted Inspection Plan 2009–2032, to indicate the appropriate timing of maintenance activities. Three minor inspections (routine maintenance outages) have been undertaken to date with no issues detected: **First**: 17 to 21 November 2014 when Unit 11 was at 273 starts and Unit 12 was at 272 starts. **Second**: 7 to 10 November 2017 when both Unit 11 and 12 had 523 starts. **Third**: 26 to 29 February 2020 when Unit 11 had 262 starts and Unit 12 had 265 starts. Start counts will dictate the date of the next minor inspection, which is anticipated to be required in June 2021 for Unit 12 and June 2021 for Unit 11.	Conformant
GGAP2	Implement a routine preventative maintenance and cleaning regime to maintain operation of the power station at optimal efficiency.	Management advice 18 November 2020. D_002_ERM Power_Neerabup Inspection Plan 2009-2032_291020 R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020 D_007_Siemens_Neerabup Product & Service Bulletin Masterlist_2020	Refer to GGAP1. Maintenance planning schedules are in accordance with the manufacturer's requirements. Maintenance on the Neerabup gas turbines are triggered by the number of starts rather than the equivalent operating hours (EOH) due to the peaking nature of Neerabup Operations (short runs with frequent starts). The most recent inspection, the third since operations began, showed Unit 11 had accumulated 262 starts and Unit 12 accumulated 265 starts, between the second and third minor inspection (outside of OEM). The Siemens OEM schedules minor inspections at 250 starts (+/- 10 starts) or 8,000EOH whichever is earlier. It is noted that he "Minor inspections" are an "Inspection" only outage trigger to detect issues, rather than the scheduled maintenance overhaul or parts replacements that are scheduled at "Major Maintenance" triggers of which are not yet due, the minor inspections were conducted revealing no corrective action was required. Based on the current operating regime of Neerabup Power Station the 4th minor inspections will be due approximately June 2021 for Unit 12 and June 2021 for Unit 11. Water washes can be undertaken within the compressor if routine efficiency monitoring shows it is required; i.e. a significant decrease in compressor efficiency. Efficiency monitoring tests are used to initiate any corrective maintenance required in accordance with ongoing preventative maintenance order (PM336) in the MEX system.	Potentially non-conformant
GGAP3	Implement a 'continuous improvement approach' so that advances in technology and potential operational improvement of plant performance are adopted where practicable.	Management advice 18 November 2020. R_008_ERM Power_2020 (5th – 6th Mar) V94.2 Users Group Meeting – Minutes_05032020	The plant utilises current technology; however, it is being reviewed to enable continuous improvement in the future. The company is represented at gas turbine user group functions which are specifically designed to address continual improvement. The operator actively participates in the V94.2 group which is a group established specifically for users of the V94.2 gas turbine allowing personnel to improve their sharing of experience and to promote best technical solutions. The last V94.2 Australian user group conference was attended by the operator and occurred between 5 March 2019 and 6 March 2019.	Conformant
GGAP4	NewGen Power will become a member of the Greenhouse Challenge Plus Program.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2019_06012020	The previous Compliance Assessment Report indicated that the Greenhouse Challenge Plus Program ceased on 1 July 2009 before the NewGen Power Station became operational. Based on this, the auditors have assessed this item as Completed.	Completed

Audit code	Action	Evidence	Comments	Status
GGAP5	Annual auditing of greenhouse gas emissions.	Management advice 18 November 2020. R_009_Clean Energy Regulator_ NGERs S19 REPORT FY1920_041120 C_003_ERM Power_NEE extract NGERs S19 REPORT FY1920_11042020	The Proponent advised that reporting is undertaken annually under the requirements of the National Greenhouse and Energy Reporting Act 2007 (NGER). The auditor sighted the Section 19 – Energy and Emissions Report for the 2019-2020 reporting year. The report was submitted to the Clean Energy Regulator on 8 October 2020.	Conformant
GGAP6	Fund energy efficient programs in conjunction with Synergy, including the employment of a Greenhouse Program Officer.	R_001_Strategen-JBS&G_Neerabup Power Station CAR 2015_14102015	This item was deemed no longer relevant in the 2014-2015 Compliance Assessment Report and therefore the auditors have assessed it as Completed.	Completed
GGAP7	Undertake an annual review of state of the art mitigation measures to identify advances in technology and potential operational improvements of plant performance that are relevant for open-cycle gas-turbines. Investigate the feasibility of implementing these technological improvements at the NewGen Power Station.	Management advice 18 November 2020. R_008_ERM Power_2020 (5th-6th Mar) V94.2 Users Group Meeting- Minutes_05032020 D_007_ERM Power_Neerabup Product & Service Bulletin Masterlist_2020	As reported previously, the company is represented at gas turbine user group functions, which are specifically designed to address continual improvement (refer to GGAP3). The operator advised that Product and Service Bulletins are reviewed when received from Siemens or at a minimum annually to ensure that all corrections and operational specifications are up to date. Correction work orders are added to the list of outstanding maintenance activities compiled within the Neerabup Product and Service Bulletin – Master List. Correction work orders are typically conducted during scheduled maintenance outages. The operator also advised that personnel have access to an international forum to allow trouble shooting and sharing of information which includes potential improvements in operation. These currency measures are undertaken throughout the year in an ongoing manner, rather than once a year.	Conformant

Appendix F Banker's Audit

ERM Power

Bankers Audit

Neerabup Power Station

4 January 2021

59988-134,592

JBS&G Australia Pty Ltd T/A Strategen-JBS&G

www.jbsg.com.au

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1. Introduction

This report addresses the status and compliance of environmental and planning approvals granted for the Neerabup Gas-Fired Power Station. This report has been prepared for the purpose of meeting a requirement of the banker's conditions to submit an annual compliance report.

1.1 Project background

NewGen Neerabup Partnership (NewGen) is the Proponent for a proposal to construct and operate:

- a 330 megawatt open-cycle gas-turbine power station
- a 30 kilometre long gas pipeline and compressor station to transport natural gas from the Dampier to Bunbury Natural Gas Pipeline to the power station
- a 330 kilovolt electricity transmission line, approximately two kilometres long, to connect the power station to the Western Power Neerabup terminal substation.

The Minister for the Environment issued Ministerial Statement (MS) 759 on 21 January 2008, under Part IV of the *Environmental Protection Act 1986 (EP Act),* enabling the proposal to be implemented. A number of subsequent environmental and planning approvals have also been granted.

The power station is located at Neerabup, approximately 30 km north of Perth. The power station provides additional power into the South West Interconnected System (SWIS) during times of peak demand.

NewGen led the development and project financing for the Neerabup power station. ERM Power was the project and construction manager and is currently the operator of the facility.

1.2 Current status

Construction of the power station, gas pipeline and transmission line was completed in 2009, and the power station officially opened on 3 December 2009. The power station has been supplying power into the South-West Interconnected System (SWIS; as requested by Synergy) since that time.

The 330-kilovolt electricity transmission line was handed over to Western Power on 11 March 2010 and was officially published in the WA Government Gazette on 19 March 2010.

NewGen remains the proponent of the Gas-Fired Power Station, transmission line and natural gas pipeline. ERM Power is the operator/manager of the power station and pipeline facilities. Typically, power station operations consist of infrequent very short run durations. During the reporting period a total of 341 starts were recorded between the two units (11 and 12), with a 13.96% total operating capacity factor for the reporting financial year.

Previously the Stack Emission Management Plan (SEMP) was required under Conditions 4-3.2 and 4-3.3 of MS 759 to provide verifiable evidence of compliance with the procedures. Currently the intent is to remove the requirement for the SEMP within MS 759 under Section 46 and capture it within a temporary licence amendment application. In June 2020 the application to remove the SEMP requirements was lodged, with recent draft conditions received. The removal of the SEMP will be captured in the 2020-2021 audit period.

2. Audit methodology

2.1 Audit plan

2.1.1 Purpose and scope

This document has been prepared for NewGen to fulfil the requirement of submitting a third-party annual compliance review. Specifically, the compliance review is required for the approvals that have been issued to date in relation to the NewGen Neerabup Power Station, including gas pipeline and transmission line (Table 2.1).

This audit report addresses the period from 31 July 2019 to 30 June 2020.

Table 2.1: Approvals issued to date

Relevant approval	Identification No.	Issue date
Implementation Statement that permits the implementation of the proposal pursuant to Part IV of the *Environmental Protection Act 1986.*	Statement 759.	21 January 2008.
Works Approval pursuant to Part V of the *Environmental Protection Act 1986.*	W4/2008/1.	17 April 2008.
Environmental Licence for prescribed premise pursuant to Part V of the *Environmental Protection Act 1986* and Schedule 1 Category 52 of the *Environmental Protection Regulations 1987.*	L8356/2009/2	4 December 2009 (amended 27 March 2013, 5 August 2013 and 23 October 2014). Expires 2 December 2035
Licence to Construct or Alter Well pursuant to the *Rights in Water and Irrigation Act 1914.*	RF2083, CAW168369(1).	23 January 2009.
Licence to Take Water pursuant to the *Rights in Water and Irrigation Act 1914* (Water Licence).	RF2083, GWL164093(2). RF2083, GWL164093(5).	23 January 2009 (re-issued 2 February 2010 and 28 June 2011).
WAPC Development Approval for power station under the provisions of the Metropolitan Region Scheme.	30-50179-1.	23 April 2008.
WAPC Development Approval for gas pipeline and transmission line under the provisions of the Metropolitan Region Scheme.	30-50179-2.	27 October 2008.
City of Wanneroo Development Approval for power station under the provisions of the Wanneroo District Planning Scheme No. 2.	DA07/1107.	17 March 2008.
City of Wanneroo Development Approval for gas pipeline and transmission line under the provisions of the Wanneroo District Planning Scheme No. 2.	DA08/0667.	4 September 2008.
Notice of Amendment for Environmental Licence for prescribed premise pursuant to Part V of the *Environmental Protection Act 1986* and Schedule 1 Category 52 of the *Environmental Protection Regulations 1987.*	L8356/2009/2	29 April 2016

Notes:

- Compliance with MS 759 is assessed in the annual Compliance Assessment Report (Strategen 2019 - to which this report is appended)
- Works Approval was not audited as the conditions contained in the Works Approval were all completed during the Banker's Audit prepared in 2010
- Licence to Construct or Alter Well (CAW 168369(1)) expired in July 2009 and did not form part of this audit
- WAPC Development Approval for the power station has no relevant conditions and was not part of this audit
- WAPC Development Approval (Gas Pipeline and Transmission Line) is no longer relevant and did not form part of this audit
- City of Wanneroo Development Approval (Gas Pipeline and Transmission) is no longer relevant since the construction phase is complete, and did not form part of this audit.
- It is intended to remove the SEMP from the requirements of MS 759 under Section 46, instead capturing it in a temporary license amendment application. Draft conditions for the SEMP removal were received in June 2020. This change will be captured in the 2020-2021 audit period.

1.1.1 Methodology

The site component of the audit was undertaken by Andrew Winzer (Strategen-JBS&G) on 18 November 2020 addressing the period from 1 July 2019 to 30 June 2020. The audit included

interviews with the Neerabup Power Station Manager, Bruno Lanciano, and review of key documents supplied by ERM Power.

2.2 Audit terminology

The 'Status' field of the audit tables (refer to Table 3.1; Table 3.2) describes the implementation of actions and compliance with the Statement. The Department of Water and Environmental Regulation (DWER) (previously called OEPA) prepared guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each action. The auditor applied the terminology in Table 2.2 to complete the status field of the audit tables.

Table 2.2: Action implementation status

Status	Description
Compliant/conformant.	Implementation of the proposal has been carried out in accordance with requirements of the audit element.
Completed.	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage.	The requirements of the audit element were not triggered during the reporting period.
Potentially non-compliant/Potentially non-conformant.	Possible or likely failure to meet the requirements of the audit element.
In process.	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.
Not audited.	Unable to be audited.

Source: adapted from OEPA (2012a, 2012b, 2012c and 2012d) – note that the 'Not audited' status has been added for items that were unable to be audited.

3. Audit results

3.1 Compliance with conditions

Full results of the assessment of compliance associated with this Banker's Audit are provided in the following audit tables, specifically:

- Environmental licence (L8356/2009/2) (refer to Table 3.1)
- Water Licence (GWL164093(5)) (refer to Table 3.2).

3.2 Compliance with Environmental License (License Number L8356/2009/2)

The audit addressed 26 sub-conditions derived from 4 conditions; Neerabup Power Station was found to be potentially compliant with one sub-condition, with:

- Twenty-two conditions were assessed as compliant/conformant (during this audit period)
- Three conditions were assessed as not required at this stage (during this audit period)
- One condition was assessed as potentially non-compliant (during this audit period)

Table 3.1: Environmental License (License Number L8356/2009/2; amended 23 October 2014) audit table

I.D Code	Requirement	Evidence	Comments	Status
L8356-2009-2: 1.2.1	Nothing in this Licence shall be taken to authorise any emission that is not mentioned in this licence, where the emission amounts to: (a) pollution; (b) unreasonable emission; (c) discharge of waste in circumstances likely to cause pollution; or (d) being contrary to any written law.	Management advice 18 November 2020. Site inspection 18 November 2020. D_004_ERM Power_Incident Register_15122020 D_003_ERM Power_NPS-REG-ECT-COMP External Complaints Register_15122020	No unauthorised emissions were observed during the site inspection. There were no recordable incidents or complaints during the audit period relating to emissions and/or pollution.	Compliant
L8356-2009-2: 1.2.2	The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.	Management advice 18 November 2020. Site inspection 18 November 2020. R_001_Strategen-JBS&G_2018-2019-Neerabup-Environmental-Complaince-Report_06012020 D_002_ERM Power_Neerabup Inspection Plan 2009-2032_291020	As reported previously, there are no specific additional air pollution control equipment at the power station. The gas turbines themselves are modern low NOx burners. Maintenance on the Neerabup gas turbines are triggered by the number of starts rather than the equivalent operating hours (EOH) due to the peaking nature of Neerabup Operations (short runs with frequent starts). During the 2020-21 reporting period it was brought to the Operations Managers attention that the Siemens OEM schedule for minor inspections is 250 starts (+/- 10 starts) or 8,000 EOH whichever is earlier. Previous annual reports stated minor inspections were triggered at 250 starts (+/- 10%) which is incorrect. The Siemens OEM schedules minor inspections at 250 starts (+/- 10 starts) or 8,000 EOH whichever is earlier. The operator advised that the trigger item of number of starts is tracked within Neerabup Forecasted Inspection Plan 2009–2032, to indicate the appropriate timing of maintenance activities. Three minor inspections (routine maintenance outages) have been undertaken to date: **First:** 17 to 21 November 2014 when Unit 11 was at 273 starts and Unit 12 was at 272 starts. **Second:** 7 to 10 November 2017 when both Unit 11 and 12 had 523 starts. **Third:** 26 to 29 February 2020 when Unit 11 had 785 starts and Unit 12 had 788 starts. At the time of the third minor inspection, Unit 11 had accumulated 262 starts and Unit 12 had accumulated 265 starts (outside OEM tolerance). It is noted that he “Minor inspections” are an “Inspection” only outage trigger to detect issues, rather than the scheduled maintenance overhaul or parts replacements that are scheduled at “Major Maintenance” triggers of which are not yet due, the minor inspections were conducted revealing no corrective action was required. Based on the current operating regime of Neerabup Power Station the 4th minor inspections for both GT units will be due approximately June 2021. Monitoring equipment is maintained and calibrated to maintain NATA accreditation for contractors engaged to undertake air emissions and groundwater monitoring.	Potentially non-compliant
L8356-2009-2: 1.2.3	The Licensee, except where storage is prescribed in section 1.3, shall ensure that environmentally hazardous substances are stored in accordance with the Code of Practice for the Storage of dangerous goods.	Management advice 18 November 2020. Site inspection 18 November 2020. P_003_Strategen-JBS&G_Chemical storage bunding_18112020 P_004_Strategen-JBS&G_Chemical storage shed_18112020 D_010_ERM Power_NPS-REG-HAZ-01 Hazardous Substance MSDS Register	The site inspection confirmed that environmentally hazardous material is stored appropriately (P_003; P_004). Site observations included: • all chemicals and hydrocarbons are stored in bunded areas • a chemical storage shed is available, of which the floor is concrete, bunded and graded for spills to be collected in a sump • the fuel storage tank associated with the emergency diesel generator is self-bunded • all reject water is directed to the collection pond • site stormwater us directed to the soakage pit • all transmission areas are bunded and constructed in such a way that spills can be collected and removed from site. Process includes an oily water separator • MSDS register is maintained for all hazardous goods stored on site	Compliant
L8356-2009-2: 1.2.4	The Licensee shall immediately recover or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.	Management advice 18 November 2020. Site inspection 18 November 2020.	No reportable spills were recorded during the audit period.	N/A

<table>
<tr><th>I.D Code</th><th>Requirement</th><th>Evidence</th><th>Comments</th><th>Status</th></tr>
<tr><td></td><td></td><td>R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020

D_004_ERM Power_Incident Register_15122020</td><td></td><td></td></tr>
<tr><td>L8356-2009-2: 1.2.5</td><td>The Licensee shall:
(a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and
(b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.[1]
Note1: The Environmental Protection (Unauthorised Discharges) Regulations 2004 make it an offence to discharge certain materials into the environment.</td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

P_005_Strategen-JBS&G_Evaporation pond_18112020

P_006_Strategen-JBS&G_Stormwater pit_18112020</td><td>The site inspection confirmed that all potentially contaminated stormwater is collected and treated on site.

Site observations included:
• site stormwater is directed to the soakage pit
• all transmission areas are bunded and drain to the concrete lined potentially contaminated stormwater pit
• an oily water separator is used to separate oil from contaminated stormwater, water can be released from the oily water pit to the site’s soakage pit if it is acceptable to do so as defined by the site procedures. Oil is collected and disposed of off-site via an authorised disposal facility as required, however this is yet to occur.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 1.3.1</td><td>The Licensee shall divert all reject water from the Demineralised Water Plant to the evaporation ponds as depicted in Schedule 1.</td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

P_005_Strategen-JBS&G_Evaporation pond_18112020</td><td>The site inspection confirmed that systems are in place to divert all reject water from the demineralised water plant to the evaporation pond.</td><td>Compliant</td></tr>
<tr><td colspan="5">Emissions</td></tr>
<tr><td>L8356-2009-2: 2.1.1</td><td>The Licensee shall record and investigate the exceedance of any descriptive or numerical limit or target specified in any part of section 2 of this Licence.</td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>No exceedances of air emissions targets were recorded during the audit period.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 2.2.1</td><td>The Licensee shall use ensure that where waste is emitted to air from the emission points in Table 2.2.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this licence.
Table 2.2.1: Point source emissions points to air
<table>
<tr><th>Emission point reference</th><th>Emission point</th><th>Emission point height (m)</th><th>Source, including any abatement</th></tr>
<tr><td>A1</td><td>Unit 11</td><td>35</td><td>165 MWe open cycle Gas Turbine Unit 11, fitted with low NOx burners</td></tr>
<tr><td>A2</td><td>Unit 12</td><td>35</td><td>165 MWe open cycle Gas Turbine Unit 12, fitted with low NOx burners</td></tr>
</table></td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

R_002_Strategen-JBS&G_2018-2019-Neerabup-Environmental-Compliance-Report-1_06012020</td><td>Design and construction occurred outside of the audit period relevant to this report. The power station was constructed with low NOx burners and air emissions are discharged from the stacks fitted to the gas turbine units.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 2.2.2</td><td>The Licensee shall target point source emissions to air at or below the levels specified in Table 2.2.2.
Table 2.2.2: Point source emission targets to air
<table>
<tr><th>Emission point reference</th><th>Parameter</th><th>Target (including units)1,2</th><th>Averaging period</th></tr>
<tr><td>A1, A2</td><td>NOx</td><td>51 mg/Nm^3
25 ppmvd</td><td>60 minute average</td></tr>
</table>
Note 1: All units are referenced to STP dry.
Note 2: All units are referenced to 15% O_2.
Note 3: Target values do not apply during start-up, shutdown and if the gas turbines are operating below 60% maximum load.</td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>Gas turbines are fitted with low NOx burners.

NOx emissions from Unit 11 and Unit 12 were compliant during the audit period (38mg/Nm^3 and 39mg/Nm^3 respectively).

Stack emissions testing was undertaken in November 2019 during required operating loads and NOx measurements were reported using the appropriate units.</td><td>Compliant</td></tr>
<tr><td colspan="5">Monitoring</td></tr>
<tr><td>L8356-2009-2: 3.1.1</td><td>The licensee shall ensure that:
(a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
(b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11;</td><td>R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>Groundwater samples were collected by 360 Environmental as per:
• AS/NZS 5667.1:1998 Water Quality Sampling. Part I – Guidance on the Design of Sampling Programs, Sampling Techniques and the Preservation and Handling of Samples</td><td>Compliant</td></tr>
</table>

<table>
<tr><th>I.D Code</th><th>Requirement</th><th>Evidence</th><th>Comments</th><th>Status</th></tr>
<tr><td></td><td>(c) all samples are submitted to a laboratory with current NATA accreditation for the parameters to be measured.</td><td></td><td>• AS/NZS 5667.11:1998 Water Quality Sampling. Part II – Guidance on Sampling of Groundwater.

Samples were analysed by Eurofins MGT laboratories (NATA Accredited).</td><td></td></tr>
<tr><td>L8356-2009-2: 3.1.2</td><td>The Licensee shall ensure that:
(a) six monthly monitoring is undertaken at least 5 months apart; and
(b) annual monitoring is undertaken at least 9 months apart.</td><td>Management advice 18 November 2020.

Site inspection 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>Licence L8356/2009/2 was issued on 23 October 2014 specifying a reduced frequency for the groundwater monitoring program (from six monthly to annually).
Annual groundwater sampling was completed on the 4 November 2019, 12 months following the previous reporting sampling period, which was undertaken on 25 October 2018

Annual air emissions stack testing monitoring was conducted on 4 and 7 of November 2019, this is at least nine months apart from the previous reporting period, whereby testing was complete on 1 and 8 January 2019.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 3.1.3</td><td>The Licensee shall record production or throughput data and any other process parameters relevant to any non-continuous or CEMS monitoring undertaken.</td><td>Management advice 18 November 2020.

D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020

D_005_ERM Power_GT11 Performance Tracking_2020

D_006_ERM Power_GT12 Performance Tracking_20120

D_008_ERM Power_GT11 Comp Perf tracking_2020

D_009_ERM Power_GT12 Comp Perf tracking_2020</td><td>CEMS equipment has been decommissioned as requirement for CEMS monitoring has been removed from license by earlier amendments.

Performance tracking is undertaken for both units.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 3.1.4</td><td>The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer’s specifications.</td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>The DWER annual Monitoring and Compliance report indicates that the monitoring equipment used by contractors for air and water monitoring are calibrated in accordance with relevant Australian and international standards.

Monitoring of power output from the facility is undertaken outside of the premises by Western Power. The operator advised that Western Power undertakes regular calibration of the metering equipment.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 3.1.5</td><td>The Licensee shall, where the requirements for calibration cannot be practically met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the Director accompanied with a report comprising details of any modifications to the methods.</td><td>Management advice 18 November 2020.

R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020

D_004_ERM Power_Incident Register_15122020</td><td>There were no incidences where the requirements for calibration were not practically met, or a discrepancy in the interpretation of the requirements existed. Therefore, a report on any modifications to the calibration methods is not required at this stage.</td><td>N/A</td></tr>
<tr><td>L8356-2009-2: 3.2.1</td><td>The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.
Table 3.2.1: Monitoring of point source emissions to air
<table>
<tr><th>Emission point reference</th><th>Parameter</th><th>Units1,3</th><th>Frequency2</th><th>Method</th></tr>
<tr><td>A1, A2</td><td>NOx</td><td>mg/m^3
g/s</td><td>Annually</td><td>USEPA Method 7E</td></tr>
<tr><td></td><td>CO</td><td>mg/m^3
g/s</td><td></td><td>USEPA Method 10</td></tr>
<tr><td></td><td>Stack gas velocity</td><td>m/s</td><td></td><td>USEPA Method 2</td></tr>
</table>
Note 1: All units are referenced to STP dry.
Note 2: Monitoring shall be undertaken to reflect normal operating conditions and any limits or conditions on inputs or production such that minimum output per gas turbine at all times during the testing is maintained at 100 MWe and variation of no more than ±5% is observed at all times during the testing.
Note 3: All units are referenced to 15% O2.</td><td>Management advice 18 November 2020.

R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020</td><td>Annual stack emissions testing was conducted on:
• unit 11 – 7 November 2019
• unit 12 – 4 November 2019.

The results of these tests were within the defined limits.

Testing was undertaken in accordance with the specifications of this licence condition.</td><td>Compliant</td></tr>
</table>

<table>
<tr><th>I.D Code</th><th>Requirement</th><th>Evidence</th><th>Comments</th><th>Status</th></tr>
<tr><td>L8356-2009-2: 3.2.2</td><td>The Licensee shall ensure that all non-continuous sampling and analysis undertaken pursuant to condition 3.2.1 is undertaken by a holder of NATA accreditation for the relevant methods of sampling and analysis.</td><td>R_003_ERM Power_2019-2020-SEMP_Annual Compliance Report_03112020

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>Ektimo Pty Ltd are NATA accredited (NATA accreditation No. 14601) for the sampling and analysis undertaken as part of the stack emissions monitoring program.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 3.7.1</td><td>The Licensee shall monitor and record parameters specified in Table 1.3.1 according to the specifications in that table. The recorded data shall be reported in cumulative monthly totals.
Table 3.7.1: Load monitoring parameters to be recorded
<table><tr><th>Parameter</th><th>Units</th><th>Frequency</th></tr><tr><td>Run time</td><td>Hours</td><td>Monthly</td></tr><tr><td>Total electrical energy generated</td><td>MWh</td><td></td></tr><tr><td>Operating capacity</td><td>%</td><td></td></tr></table></td><td>D_001_ERM Poweer_2019-2020_Schedule 1 calcs_Audit info Neerabup Stats_Compliance_2020</td><td>Cumulative monthly totals are recorded for the parameters listed in Column 1 of Table 3.7.1.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 3.8.1</td><td>The Licensee shall undertake the monitoring specified in Table 3.8.1 and record and investigate the exceedance of any target specified.
Table 3.8.1: Monitoring of ambient groundwater quality
<table><tr><th>Monitoring point reference and location</th><th>Parameter</th><th>Units</th><th>Averaging period</th><th>Frequency</th></tr><tr><td rowspan="6">GW1, GW2, GW3, GW4, GW5, GW6, GW7</td><td>pH</td><td>-</td><td rowspan="6">Spot sample</td><td rowspan="6">Annually</td></tr><tr><td>Total dissolved solids</td><td>mg/L</td></tr><tr><td>Conductivity</td><td>µS/cm</td></tr><tr><td>Total nitrogen</td><td>mg/L</td></tr><tr><td>Total phosphorous</td><td>mg/L</td></tr><tr><td>Total recoverable hydrocarbons</td><td>mg/L</td></tr></table></td><td>R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>Groundwater was sampled and analysed in November 2019 in accordance with Table 3.8.1.

There are no targets for ambient groundwater quality specified in the licence. The 2019 Groundwater Monitoring Report prepared following the November 2019 sampling event states that low TRH/TPH concentrations above the LOR were recorded for the first time since 2014.

The following conclusions were made:
• Water quality results from the November 2019 round of monitoring are generally consistent with historical groundwater data for the site.
• Concentrations of TRH/TPH in the November 2019 round of monitoring have been observed above the LOR, in low but significant concentrations at well sites MW2, MW5, MW6, and MW7, for the first time on the site since the October 2014 monitoring round.

Following the recommendations of the 2019 Groundwater Monitoring Report, follow-up groundwater sampling with use of silica gel clean-up was conducted during the Winter 2020 Groundwater Monitoring Event to determine hydrocarbon presence and potential sources.

The following conclusions were made:
• The TRH concentrations reported during the November 2019 GME were not reported during the 2020 Winter GME following silica gel clean up. Therefore, the TRH resulted reported in the November GME can be attributed to a non-petroleum or organic source and does not constitute any exceedances or determined any notification requirements.

The silica gel clean-up method will be implemented in all future sampling programs.</td><td>Compliant</td></tr>
<tr><td colspan="5">Information</td></tr>
<tr><td>L8356-2009-2: 5.1.1</td><td>All information and records required by the Licence shall:
(a) be legible;
(b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
(c) except for records listed in 5.1.1 (d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
(d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
(i) off-site environmental effects; or
(ii) matters which affect condition of the land or waters.</td><td>Management advice 18 November 2020.</td><td>Records that are required by this licence (including original and subsequent amendments) are stored on the local server that is replicated in the Brisbane head office and backed up on duplicate servers.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.1.2</td><td>The Licensee shall ensure that:
(a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
(b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.</td><td>Management advice 18 November 2020.</td><td>Staff that are ‘left in charge of the Premises’ include the Power Station Manager and, in their absence, the acting Station Manager/2IC. The Power Station Manager was interviewed for this audit and was aware of the licence conditions. The position descriptions for the Power Station Manager and Operations Engineer Support (acting Station Manager/2IC) outline their responsibilities for ensuring compliance with regulatory requirements. The Power Station Manager understands the requirement to delegate responsibility for ensuring compliance with licence conditions in their absence.

Access to all staff at all times to copies of this licence is provided through the local computer network. All staff and contractors performing work within the site are required to undertake a site induction which outlines their obligations under the EP Act and specific requirements of regulatory approvals.</td><td>Compliant</td></tr>
</table>

<table>
<tr><th>I.D Code</th><th>Requirement</th><th>Evidence</th><th>Comments</th><th>Status</th></tr>
<tr><td>L8356-2009-2: 5.1.3</td><td>The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.</td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020

C_001_ERM Power_190814 2019-2020 NNP DWER Annual Monitoring & Compliance Report Submission Email-2_27082020</td><td>An Annual Audit Compliance Report (AACR) was prepared in the form specified in Schedule 2 of the licence. This AACR addresses compliance with L8356/2009/2 during the reporting period 1 July 2019 to 30 June 2020 and was sent to the DWER on 27 August 2020.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.1.4</td><td>The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.</td><td>Management advice 18 November 2020.

D_003_ERM Power_NPS-REG-ECT-COMP External Complaints Register_15122020</td><td>An external complaints procedure is initiated on receiving a complaint which requires recording the details of the complaint and any remedial actions taken.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.2.1</td><td>The Licensee shall submit to the Director at the Contact Address an Annual Environmental Report by 31 August each year after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.
Table 5.2.1: Annual Environmental Report
<table>
<tr><th>Condition or table (if relevant)</th><th>Parameter</th><th>Format or form1</th></tr>
<tr><td>-</td><td>Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the annual period and any action taken</td><td>None specified</td></tr>
<tr><td>Table 2.2.2, 2.1.1</td><td>Target exceedances
Summary of any data exceeding targets, including information on why the exceedance occurred and action taken by the Licensee to prevent recurrence of such exceedance</td><td>None specified</td></tr>
<tr><td>Table 3.2.1</td><td>Annual stack monitoring results for NOx, CO and stack gas velocity</td><td>AR1</td></tr>
<tr><td>Table 3.8.1</td><td>Groundwater quality monitoring results</td><td>GR1</td></tr>
<tr><td>Table 3.7.1</td><td>Cumulative monthly total of each parameter recorded as specified in condition 3.7.1</td><td></td></tr>
<tr><td>5.1.3</td><td>Compliance</td><td>Annual Audit Compliance Report (AACR)</td></tr>
<tr><td>5.1.4</td><td>Complaints summary</td><td>None specified</td></tr>
</table>
Note 1: Forma are in Schedule 2</td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020

C_001_ERM Power_190814 2019-2020 NNP DWER Annual Monitoring & Compliance Report Submission Email-2_27082020</td><td>An annual monitoring report addressing the reporting period 1 July 2019 to 30 June 2020 was prepared in accordance with the amended licence conditions issued on 23 October 2014. The report contained the information listed in Table 5.2.1 in the format specified in that table.

The report was submitted to DWER on 27 August 2020.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.2.2</td><td>The Licensee shall ensure that the Annual Environmental Report also contains:
(a) any relevant process, production or operational data recorded under Condition 3.1.3; and
(b) an assessment of the information contained within the report against previous monitoring results and Licence limits and/or targets.</td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>The annual monitoring report contained data recorded under licence condition 3.1.3 including production data. The environmental monitoring data recorded during the reporting period was assessed against data recorded over previous reporting periods and Licence targets.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.2.3</td><td>The Licensee shall submit the information in Table 5.2.2 to the CEO according to the specifications in that table.
Table 5.2.2: Non-annual reporting requirements
<table>
<tr><th>Condition or table (if relevant)</th><th>Parameter</th><th>Reporting period</th><th>Reporting date (after end of the reporting period)</th><th>Format or form1</th></tr>
<tr><td>-</td><td>Copies of original monitoring reports submitted to the Licensee by third parties</td><td>Not Applicable</td><td>Within 14 days of the CEOs request</td><td>As received by the Licensee from third parties</td></tr>
</table></td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020

C_001_ERM Power_190814 2019-2020 NNP DWER Annual Monitoring & Compliance Report Submission Email-2_27082020</td><td>There were no requests made by DWER for copies of original monitoring reports. The air emission monitoring report and groundwater monitoring report containing results from monitoring undertaken during the audit period were submitted to DWER as part of the DWER Annual Environmental and Audit Compliance Report on 27 August 2020.</td><td>Compliant</td></tr>
<tr><td>L8356-2009-2: 5.3.1</td><td>The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the CEO in accordance with the notification requirements of the table.
Table 5.3.1: Notification requirements</td><td>Management advice 18 November 2020.

R_004_ERM Power_2019-2020 NewGen Neerabup DWER Annual Monitoring & Compliance Report_24082020</td><td>As previously stated in L8356-2009-2: 3.1.5, monitoring equipment used on site has been appropriately calibrated to date and therefore a report on any modifications to the calibration methods is not required at this stage.</td><td>N/A</td></tr>
</table>

<table>
<tr><th>I.D Code</th><th>Requirement</th><th>Evidence</th><th>Comments</th><th>Status</th></tr>
<tr>
<td></td>
<td>
<table>
<tr><th>Condition or table (if relevant)</th><th>Parameter</th><th>Notification requirement1</th><th>Format or form2</th></tr>
<tr><td>3.1.5</td><td>Calibration report</td><td>As soon as practicable</td><td>None specified</td></tr>
<tr><td>2.1.1</td><td>Target exceedance</td><td>Notification required as soon as practicable but no later than 5pm of the next usual working day.
Exceedance report to be submitted no later than 7 usual working days</td><td>ET1</td></tr>
<tr><td colspan="2">-
Any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution
-</td><td>Part A: As soon as practicable but no later than 5pm of the next usual working day.
Part B: As soon as practicable but no later than 5 usual working days</td><td>N1</td></tr>
<tr><td colspan="2">Any confirmed discharge of freshwater from the reverse osmosis plants to the stormwater soak pit.</td><td>As soon as practicable</td><td>None specified</td></tr>
</table>
Note 1: Notification requirements in the licence shall not negate the requirement to comply with s72 of the Act.
Note 2: Forms are in Schedule 2.
</td>
<td></td>
<td>As stated in L8356-2009-2: 2.1.1, there were no exceedance of air emission targets recorded during the audit period.

No notifications were required as no target exceedances occurred, and no failure or malfunction of any pollution control equipment occurred.

There were no releases of freshwater from the reverse osmosis plant to the soak pit.</td>
<td></td>
</tr>
</table>

Table 3.2: Licence to Take Water (GWL164093(5)) Issued 28 June 2011 (applicable to both bores – Licence valid from 28 June 2011 to 18 May 2021) audit table

#	Associated conditions (Licence to take Water)	Evidence	Comments	Status
1	That should the licensee's draw adversely affect the aquifer or other users in the area, the Department of Water may reduce the amount that may be drawn.	N/A.	This item has been taken as a note.	Not audited.
2	Approval by the Department of Water is to be obtained prior to the construction of additional and replacement wells and the modification or refurbishment of existing wells.	ERM Power advice 18 November 2020. Site inspection 18 November 2020.	No additional wells required. None of the existing wells were modified or refurbished.	N/A
3	The licensee must install a cumulative water meter of a type approved under the Rights in Water and Irrigation (Approved Meters) Order 2009 to each water draw point under this licence.	Management advice 18 November 2020. R_002_Strategen-JBS&G_2018-2019-Neerabup-Environmental-Compliance-Report-1_06012020	As reported last year, the water meter has been installed in accordance with the requirements of the Rights in Water and Irrigation (Approved Meters) Order 2009. The operator advised that a five-yearly interval for calibration has been deemed to be appropriate. This was determined in communication with the manufacturer and the Department of Water. Bore 1 and Bore 2 were last calibrated on 23 June 2016. Both bores are next due for calibration on 23 June 2021. This maintenance will be tracked through the work order system. Calibration certificates state that the water meters are acceptable in accordance with relevant Australian Standards.	Compliant
4	The meter(s) must be installed in accordance with the provisions of the document entitled 'Guidelines for Water Meter Installation 2009' before any water is taken under this licence.	Refer to #3.	Refer to #3.	Compliant
5	The annual water year for water taken under this licence is defined as 12:00pm at 30 June to 12:00pm at 30 June twelve months later.	N/A	This item has been taken as a note.	Not audited.
6	The licensee must not, in any water year, take more water than the annual water entitlement specified in this licence.	See #3	The licence entitlement is 100,000 kL per year and includes two bores established on the site: Bore 1-meter serial No. 08HC05315 - total water use of 3,181 kL during the audit period. Bore 2-meter serial No. 08HC05638 – total water use is 30,669 kL during the audit period. Total water use for 2019–20 was 33,850 kL which is within the permitted volume for the licence (GWL 164093).	Compliant
7	The licensee must take and record the reading from each meter required under this licence at the beginning and another at the end of the water year defined on this licence.	R_006_ERM Power_2019-2020 Bore 1 and 2 Water meter use card_30062020	Water bore records were undertaken at the beginning and the end of the water year for each meter.	Compliant
8	In addition to taking and recording the reading(s) at the beginning and the end of the water year, the licensee must, as close as practicable to the end of each month (other than the month in which the water year ends), take and record the reading from each meter required under this licence.	R_006_ERM Power_2019-2020 Bore 1 and 2 Water meter use card_30062020	All water bore readings were recorded as close as practicable to the end of each month during the reporting period.	Compliant
9	All meter readings must be recorded on the 'Meter Water Use Card'.	R_006_ERM Power_2019-2020 Bore 1 and 2 Water meter use card_30062020 C_004_ERM Power_2020 Water Use Online Submission Email confirmation_07072020	The auditors note that there is now an online system for submission of water meter readings. This system has resulted in duplication of water use records being kept, both through water use cards and online. In email correspondence, DWER confirmed that submission of water use records entries via the online system only are satisfactory.	Compliant
10	The completed Water Meter Use Card must be returned to the Department of Water by 7 July each year.	C_004_ERM Power_2020 Water Use Online Submission Email confirmation_07072020	DWER confirmed on the 30 June 2020 that online submission of water meter readings had been received.	Compliant
11	The licensee must notify the Department of Water in writing of any water meter malfunction within seven days of the malfunction being noticed.	Management advice 18 November 2020.	The operator advised that there were no malfunctions during the audit period.	N/A
12	The licensee must obtain authorisation from the Department of Water before removing, replacing or interfering with any meter required under this licence.	Management advice 18 November 2020.	No replacement or interfering of meters was undertaken during the audit period.	N/A

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