

Amendment Report

Application for Licence Amendment

Part V Division 3 of the Environmental Protection Act 1986

Licence Number	L5366/1972/14
Licence Holder	Electricity Generation and Retail Corporation
File Number	2010/007578-4
Premises	Kwinana Power Station
	22 Leath Road NAVAL BASE WA 6165
	Legal description –
	Part of Lot 22 on Diagram 72310, Part of Lot 218 on Plan 215932, Part of Lot 230 on Plan 240259, Part of Lot 229 on Plan 240259, and Part of Lot 4552 on Plan 220690
	As defined by the coordinates in Schedule 1 of the Revised Licence
Date of Report	09/01/2023
Decision	Revised licence granted

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1. Decision summary

Licence L5366/1972/14 is held by the Electricity Generation and Retail Corporation trading as Synergy (licence holder) for the Kwinana Power Station, located at 22 Leath Road, Naval Base (the Premises).

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L5366/1972/14 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the Premises.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2.2 Application summary

On 7 July 2022, the licence holder submitted an application to the department to amend Licence L5366/1972/14 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The scope of assessment is based on the following amendments requested by the licence holder:

- amend the licence boundary so that the batteries from the battery energy storage system (BESS) are excluded and the high voltage transformers included in the prescribed premises, amend Figure 1 and co-ordinates table to reflect changes to boundary;
- 2. amend condition 1 to change the terminology of the wastewater treatment plant to water treatment plant (WTP) because the plant is used to treat bore water as well as wastewater;
- In Table 1 for the oily water separator (OWS), to read processes wastewater from the Kwinana Power Station prescribed premises that may be contaminated with hydrocarbons; and
- 4. Addition to infrastructure table (Table 1) oily water separator overflow pond with the following operational requirements:
 - a) receives overflow from oily water separator;
 - b) maintain high density polyethylene (HDPE) liner; and
 - c) leachate collected to be re-used or disposed of appropriately
- 5. Amend Table 1 Storage Dam requirements to:
 - a) correct the number of storage dams to 2 designated east and west storage dam.
 - b) remove the word all from the first operational requirement.
 - c) change the requirement "must have intact HDPE liner" to "Maintain HDPE Liner"; and
 - d) add the requirement may store stormwater/wastewater from the BESS that has been directed to Kwinana Power Station prescribed premises
- 6. Add item of infrastructure Fuel Oil Bulk Storage tank 6 (FOBS 6) to Table 1 with the operational requirement that in the event of an incident at the BESS that creates firewater runoff, wastewater may be directed to FOBS tank 6 for storage prior to being tankered off-

site

- 7. Alter Table 2 Types of waste authorised to be accepted onto the premises allowing firefighting water generated at the BESS to be accepted at the premises.
- 8. Alter the wording of condition 10 to clarify the requirements of the condition.
- 9. Correct cross references in Table 8, condition 22, condition 28 and 29. Add table title for table 13: Non-annual reporting.;
- 10. Amend the definitions table to exclude AS1940 and AS3780 and to include BESS, EPAct, FOBS, high efficiency gas turbine (HEGT), OWS and WTP.

2.2.1 Increase in generation capacity

During the assessment of the application, the licence holder met with the department and subsequently provided an addendum amendment request and supporting information for a 30MW increase of the existing assessed production capacity of 200MW to 230MW. Taking into account the reasoning for the request, the delegated officer agreed to assess the proposed production capacity increase through this assessed process. Further background information on this is provided in section 2.3.1

2.3 Background

The licence holder is planning to construct a 100MW/200MWh battery energy storage system (BESS) on land at Kwinana Power Station. The Kwinana Big Battery is one of the key actions of the Western Australian Climate Policy (November 2020) and will enable renewable energy to be stored while maintaining system security in the southwest interconnected network.

The installation and operation of the Big Battery and associated infrastructure in isolation is not a prescribed premises activity under Schedule 1 of the *Environmental Protection Regulations 1987.* However, the battery storage and its associated substation cross the prescribed premises boundary of the existing licence. Potentially contaminated stormwater from the transformer bund will be directed to the oily water separator and wastewater storage system for the Kwinana Power Station within the prescribed premises boundary.

In the event of a thermal runaway of a lithium -ion battery, firewater from the hardstand area of the batteries will be directed to a holding sump and thence to a tank on the Kwinana Power Station premises.

The proposed amendment to the prescribed premises boundary will mean that all of the batteries and their compound will be outside the prescribed premises boundary and the substation with all the high voltage transformers and their compound will be inside the prescribed premises boundary.

2.3.1 Increase in Generation Capacity

The licence holder outlined broader electrical supply issues during summer peak periods that had been raised by the Australian Energy Market Operator (AEMO) which oversees the wholesale energy market in Western Australia. The licence holder advised that the Minister for Energy had asked it to urgently investigate options to increase generation capacity.

The licence holder identified an opportunity for an efficiency improvement at the Kwinana Power Station which it expects to provide up to an additional 30MW of power generation capacity. The licence holder outlined that it operates two LMS100 Gas Turbine (GT) Units (KWGT2 and KWGT3) which have been historically limited to 99-103MW depending on air cooling efficiency. The licence holder has upgraded each LMS100 unit which increases airflow function into the GT by 3.4% and increasing overall efficiency by 0.4% and achieving a maximum generation capacity of 230MW depending on air cooling efficiency.

The licence holder took the view that the increase has no impact on NOx emissions concentrations with marginal increase in volumetric flowrates in line with the increased capacity. It did not identify any changes to its air emissions risk profile as a result of the 30MW increase. It is understood that efficiency improvements will result in emissions concentration remaining consistent with existing levels because the same concentration or less gas fuel being required to consumed to operate the GT at the new higher MW output.

PEMS model update

The licence holder utilises a predictive emissions monitoring system (PEMS) model to predict emissions to the current maximum output of up to 103 MW per GT unit. The high efficiency gas turbine (HEGT) upgrades mean that the PEMS model will need to be re-configured allowing for the new maximum output. The licence holder outlined its plan to ensure the PEMS remains accurate under the new operational range. The licence holder proposed to equip each GT unit with a gas analyser to be operated for an eight-week period under the new range of MW conditions to re-model the PEMS for data quality assurance. The analysing units are setup, calibrated and maintained by a NATA accredited consultant.

The licence holder also advised that it will formerly notify the department under existing condition 7 prior to the commencement of testing without NOx water injection for the purpose of development the PEMS model.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Emission	Sources	Potential pathways	Proposed controls
Potentially contaminated stormwater	High voltage transformer bund and battery bund.	Direct discharge	Directed to existing oily water separator.
Contaminated firefighting water	Battery storage bund	Direct discharge	Collected in sump and directed to holding tank on Kwinana Power Station premises prior to offsite disposal or treatment.
NOx	Combustion of natural gas	Air/windborne pathway	Water injectionLow NOx burners

 Table 1: Licence Holder controls

Usually captured stormwater in the battery bund will be clean and directed to soak wells however

if it should become contaminated it can be directed to the Kwinana Power Station oily water separator. See Figure 1 for a conceptual drawing of the wastewater arrangements for the BESS.

Assuming record annual rainfall of 905 mm and 100% stormwater runoff approximately 13,000 kL would run-off from the BESS well within the 300,000 kL per annum capacity of the treatment plant. At present the oily water separator is operating below capacity with < 4,000 kL being received from the Cockburn Power Station. The area and capacity of the transformer bunds are significantly less than those of the fuel tanks that they are replacing.



Figure 1: Conceptual drawing of Kwinana BESS wastewater management

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

 Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	4 km SE from boundary

Environmental receptors	Distance from prescribed activity
Cockburn Sound	Adjacent to premises
Groundwater (non potable)	4 metres below ground level

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L5366/1972/14 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3. Risk assessment of potential emissions and discharges from the Premises operation

Risk Event				Risk rating ¹	Licence Helder's			
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood	controls sufficient?	Conditions ² of licence	Reasoning
Operation								
Loss of containment	Hydrocarbon contaminated stormwater	Direct discharge	Land and groundwater contamination	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1	N/A
Generation of power by natural gas turbines	NOx	Air and wind blown	Residential premises 4 km away. Industrial premises immediately across boundary	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1	Increase in the production capacity Increases in efficiency of the modified gas turbines mean they are expected to use the same amount of fuel for the higher power yield. Modelling predicts that the HEGTs currently cause maximum 1 hour ground level concentrations at 21% of the NEPM standard and a maximum 1 year glc at 2% of the NEPM standard. The nature and scale of the efficiency increase are not expected to meaningfully impact NOx emission rates or existing predictive modelled ground level concentrations compared to NEPM health standards for NOx. The emissions of the modified gas turbines will be continuously monitored for eight weeks while the PEMS model is reconfigured.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020). Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal 2 August 2022	The City of Kwinana replied 9 August 2022 advising that the battery had JDAP approval and that they had no comment on the proposed amendment.	Noted.
Licence holder provided with draft decision for comment on 15 September 2022	The licence holder replied on 6 December 2022. A summary of the licence holder's comments is outlined in Appendix 2	See Appendix 2

5. Decision

The delegated officer considered and, where applicable, undertook risk assessment of the licence holder's requested amendments as listed in Section 2.2. The delegated officer's decision and summary reasons on each requested item are provided Appendix 1.

5.1 Increase in production capacity

The delegated officer noted that the requested 30MW increase to production capacity related to an urgent matter for strategic power supply during summer peak periods. The delegated officer assessed the expected impacts on air emissions and the air emissions risk profile and determined to grant an amended licence reflecting an assessed production capacity of 230MW. The delegated officer determined that the increase was not expected to meaningfully change the risk profile of NOx emissions and the existing licence specified conditions that remained reasonable and adequate, include requirements for monitoring, PEMS, NOx limits and reporting. The reasons for this decision included:

- The nature of the efficiency upgrade relating to upgraded air flow function in each GT unit which will marginally increase volumetric flow while NOx concentrations remain the same;
- The licence holder's proposed plan for re-configuring the PEMS model under the new operational range over an eight week period that will be reflected in the amended licence;
- Based on review of previous predictive modelling of NOx emissions from the HEGT's, the delegated officer expects changes to predicted 1-hour and annual average ground level concentrations NOx to be negligible and well below relevant NEPM health standards.

6. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

6.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Condition no.	Proposed amendments	
Condition 1	Change WWTP to WTP	
Table 1	Add the words by licensed controlled waste contractor	
	Add a line to the table for oily water separator overflow pond	
	Change the wording of the storage dam requirements remove must have intact liner to must be maintained to prevent leaks	
	Add a line to the table to include high voltage transformers for BESS	
	Add a line to the table for fuel bulk storage tank 6	
Condition 3	Add a line to the waste acceptance table (Table 2) to include contaminated fire water from a fire at the BESS.	
Table 2		
Condition 10	Reworded condition to clarify the requirements of the condition and corrected a cross reference.	
Condition 22	Corrected the cross reference	
Condition 28	Corrected the cross reference	
Definitions	Removed the definitions for AS1940 and AS3780.	
	Corrected typographical error in definition of AS/NZ 5667.9	
	Added a definition for BESS, EP Act, FOBS 6, and HEGT	
Premises Map	New Map of premises showing new boundary and infrastructure	
Premises co- ordinates	Amended the list of co-ordinates to define the new premises boundary.	

References

- 1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
- 2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
- 3. DWER 2020, Guideline: Risk Assessments, Perth, Western Australia.
- 4. Environ 2009 Verve Energy High Efficiency Gas Turbine Air Dispersion Modelling Analysis Perth Western Australia

Appendix 1: Summary of decision making on requested amendments

Amendment request (refer to section 2.2)	Licence holder requested amendment	Decision	Summary reasons
1	Prescribed premises boundary changes.	Accepted	Changes to wastewater and contaminated stormwater aspects of the boundary change are further considered in the points below.
2	Condition 1 – wastewater treatment plant terminology change.	Accepted	Change accepted on the basis that it is considered an administrative update to improve clarity in the condition with no impact of the risk profile of emissions and discharges.
3	Table 1 – Oily water separator requirements	Refused	 a) The delegated officer considered the requested change unnecessary as the OWS operational requirement relates to maintenance of the OWS to ensure a treated water quality standard is maintained. The requested change would also duplicate the requirements of condition 2. b) Authorising the acceptance of BESS stormwater has been addressed in response to Amendment item 7 by amended to condition 3 (Table 2). The delegated officer therefore refused this requested amendment to Table 1 as it would duplicate the amended requirements in Table 2.
4	Table 1 – Oily water separator overflow pond requirements (new row)		 a) Not accepted for duplication (refer to Item 3(a)) b) Accepted to the extent that requirement will be consistent with final wording in item 5(c) c) Accepted with modified wording.
5	Table 1 – Storage Dam requirements	Accepted in part	 a) Accepted to the extent that infrastructure was corrected to two storage dams. The delegated officer noted the two storage dams and separate overflow pond are clearly distinguished through Table 2 and the layout map attached to the licence. b) Change accepted on the basis that it is considered an administrative update to improve clarity in the condition with no impact of the risk profile of emissions and discharges. c) The licence holder requested flexibility around the requirement to have an intact HDPE liner as it does not allow for proactive maintenance. The delegated officer did not accept the proposed wording "maintain HDPE liner" as it was unlikely to be consistent with Guidance Statement: Condition setting principles. To address the intent of the licence holder's request, the delegated officer amended the requirement to specify "must have an intact liner <u>except</u> during scheduled repair or maintenance."

Amendment request (refer to section 2.2)	Licence holder requested amendment	Decision	Summary reasons
			d) Not accepted on the basis that it duplicates amended requirements of Table 2.
6	Add item of infrastructure Fuel Oil Bulk Storage tank 6 (FOBS 6) to Table 1	Accepted	The delegated officer accepted the requested change on the basis that it was an appropriate risk based control to minimise the risk of firewater discharge to the environment in the event of an emergency. The proposed word "tinkered" was altered to "transported."
7	Alter Table 2 Types of waste authorised to be accepted onto the premises	Accepted	Taking into account information in section 3, the delegated officer determined that existing stormwater/wastewater treatment and storage infrastructure was fit for purpose the acceptance of the additional sources and did not change the risk profile of emissions and discharges. Table 2 was amended to incorporate the additional sources.
8	Alter the wording of condition 10 to clarify the requirements.	Accepted	The requested change was determined to be administrative and adds clarity.
9	Correct cross references in Table 8, condition 22, condition 28 and 29. Add table title for table 13: Non-annual reporting.	Accepted	The requested change was determined to be corrections or administrative in nature that don't change the risk profile of emissions and discharges.
10	Amend the definitions table to exclude AS1940 and AS3780 and to include BESS, EPAct, FOBS, HEGT, OWS and WTP	Accepted	The requested change was determined to be administrative and adds clarity.
N/A	N/A	N/A	In taking into account the licence holder's request amendment, the delegated officer identified that the high voltage transformers for the BESS should be added to Table 1 with the following operational requirements:
			 Potentially contaminated water from hund to be directed to the oily water separator.
			The delegated officer considers that this addresses the need to recognise that potentially contaminated storm water is being treated by the oily water separator.
			The delegated officer has determined that the premises has the capacity to treat wastewater from the high voltage transformer bund and the BESS

Appendix 2: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
Condition 1, Table 1	In the line for OWS separator the second point beginning 'leachate collected' should be deleted because leachate is a legacy condition from the coal powered generation and no longer required.	The delegated officer has deleted this dot point
Condition 1, Table 1	In the line 2 x storage dams delete the fourth point relating to leachate for the same reason as above.	The delegated officer has deleted this dot point
Table 2	Delete the line referring to stormwater generated at the BESS because stormwater will be managed on the BESS site	The delegated officer has deleted this line from table 2
Condition 30	Whilst agreeing to the intent of the condition the licence holder requested that the condition be removed because it is a one-off condition, and the licence holder seeks to avoid having redundant conditions in the licence requiring further amendment. The licence holder suggests requiring the report by formal letter.	The delegated officer did not accept this request. The licence allows for continuous NOx monitoring from Units 2 and 3 via PEMS which is to be done in accordance with USEPA Method PS-16. Based on the assessment, the delegated officer considered it was reasonable to require the licence holder to demonstrate the PEMS continued to provide reliable and accurate regulatory data for the new operational range. Addressing the requirement through non- statutory correspondence was not deemed appropriate in the circumstances. The delegated officer notes that once fulfilled, the condition can be removed at the next available opportunity.
Condition 30	The licence holder also requests that the report date be extended from 30 April 2023 to 31 July 2023 to allow time to gather comprehensive amount of emission data and the PEMS provider to review the data and establish a new model.	The delegated officer agrees to the extension of time
Definitions	The lice3nce holder requests that WTP (Water treatment plant be added to the definitions.	The delegated officer has amended the licence as requested
Premises maps and boundary co-ordinates	Synergy provided an updated premises map and premises boundary co-ordinates which have changed slightly since original application	The delegated officer has included the updated map and co- ordinates in the revised licence.

Appendix 3: Application validation summary

SECTION 1: APPLICATION SUMMARY									
Application type									
Amendment to licence		Current licence number:	L5366/1972/14						
		Relevant works approval number:		N/A	\boxtimes				
Date application received		7 July 2022							
Applicant and Premises details									
Applicant name/s (full legal name/s)		Electricity Generation and Retail Corporation							
Premises name		Kwinana Power Station							
Premises location		Part of Lot 22 on Diagram 72310, Part of Lot 218 on Plan 215932, Part of Lot 230 on Plan 240259, Part of Lot 229 on Plan 240259, and Part of Lot 4552 on Plan 220690							
Local Government Authority		City of Kwinana							
Application documents									
HPCM file reference number:		DWERDT628170							
Key application documents (additional to application form):		Cover Letter Shape file for boundary Licence application supplementary information							
Scope of application/assessment									
Licence amendment									
		Operation of a high efficiency gas turbines to generate power.							
Summary of proposed activities or changes to existing operations.		Amend the licence boundary to exclude the batteries from the battery energy storage system (BESS) and to include the high voltage transformers in the prescribed premises.							
		Amend condition 1 to specify additional waste water to be treated by the oily water separator.							
	ges to	Amend condition 1 to clarify that rather than three storage dams for the oily water separator there are 2 and oily water separator overflow pond.							
		Amend condition 1 to allow a fuel oil bulk storage tank to be used to store firefighting water from the BESS in the event of an incident.							
		Amend condition 3 to alter the waste acceptance to take into account potentially contaminated water from the BESS.							
		Amend condition 10 to clarify the wording and insert the correct cross reference.							
		Correct the cross reference in conditions 22 and 28							
		Add some definitions to the definitions table.							

Category number/s (activities that cause the premises to become prescribed premises)								
Table 1: Prescribed premises categories								
Prescribed premises category and description	Assessed production or design capacity			Proposed changes to the production or design capacity (amendments only)				
Category 52: Electric Power Generation	220 MW			NA				
Category 61: Liquid waste facility	300,000 tonne per annum			NA				
Category 73: Bulk storage of chemicals	35,500 m ³			NA				
Legislative context and other approvals								
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?		Yes 🗆 No 🖂	R M A	eferral decision No: lanaged under Part V □ ssessed under Part IV □				
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?		Yes 🗆 No 🛛	M E	linisterial statement No: PA Report No:				
Has the proposal been referred and/or assessed under the EPBC Act?		Yes 🗆 No 🛛	R	eference No:				
Has the applicant demonstrated occupancy (proof of occupier status)?		Yes 🗆 No 🗆	С G M O	ertificate of title eneral lease Expiry: lining lease / tenement Expiry: ther evidence Expiry:				
Has the applicant obtained all relevant planning approvals?		Yes 🗆 No 🗆 N/A 🛛	A E: If re	pproval: xpiry date: N/A explain why? Amendment not equiring approval from council				
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?		Yes 🗆 No 🖂	C N	PS No: N/A o clearing is proposed.				
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?		Yes 🗆 No 🖂		pplication reference No: N/A cence/permit No: N/A o clearing is proposed.				
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?		Yes 🗆 No 🛛	A Li Li	pplication reference No: cence/permit No: cence / permit not required.				

	Name: N/A
Yes 🗆 No 🛛	
	Name: N/A
Yes 🗆 No 🖾	
Yes 🛛 No 🗆	
Yes 🛛 No 🗆	Environmental Protection (Kwinana) (Atmospheric Wastes) Policy 1999
Yes 🗆 No 🖂	
	Classification: contaminated – remediation required (C–RR) Date of classification: August 2009
Yes 🛛 No 🗆	
	Yes □ No ⊠ Yes □ No ⊠ Yes □ No □ Yes □ No □