



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

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

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details

Licence number:	L4275/1982/15	Licence file number:	2011/000451-3
Licence holder name:	Mid West Ports Authority		
Trading as:	Mid West Ports Authority		
ACN:	73 384 989 178		
Registered business address:	PO Box 1856, Geraldton WA 6531		
Reporting period:	01 / 07 / 2020 to 30 / 06 / 2021		

Section B – Statement of compliance with licence conditions

Did you comply with all of your licence conditions during the reporting period?
(please tick the appropriate box)

☐ Yes – please complete:

- section C;
- section D (if required); and
- sign the declaration in Section F.

☒ No – please complete:

- section C;
- section D (if required);
- section E; and
- sign the declaration in Section F.

Section C – Statement of actual production

Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.

Prescribed premises category	Actual production quantity
58: Bulk material loading or unloading; premises on which clinker, coal, ore, ore concentrate or other bulk granular material (other than salt) is loaded onto or unloaded from vessels by an open material loading system	12,517,658 tonnes of licenced commodities. Note: this excludes Grain, Petroleum, General Cargo, Stockfeed and Livestock. Note: MWPA reported a total of 15,073,661 tonnes annual throughput when all commodities handled are combined.
58A: Bulk material loading or unloading; premises on which salt is loaded onto or unloaded from vessels by an open material loading system	0 Tonnes

Section D – Statement of actual Part 2 waste discharge quantity

Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.

Prescribed premises category	Actual Part 2 waste discharge quantity
N/A	

Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	4.3.1	Date(s) of non-compliance:	30/10/2020
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Details of non-compliance:

Condition 4.3.1 requires MWPA to comply with requirements of Table 4.3.1 including reporting of any incident which has caused, is causing or may cause pollution.

On the 30th of October 2020 at 0630hrs a hydraulic line ruptured on the Berth 7 Shiploader long travel brake system, this berth is operated by Karara Mining Limited (KML). Most of the hydraulic oil sprayed onto the berth infrastructure and a small quantity (~5L) was released to the marine environment. A fine sheen of hydraulic oil was observed between Berth 7 and Berth 6.

The KML Emergency Response Team responded immediately, controlling the source of the spill and deploying a boom and spill pads to contain and recover material spilled to water. The sheen was no longer visible by 0930hrs. No oil escaped the confines of the commercial harbour.

MWPA notified DWER in accordance with Condition 4.3.1.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

KML completed an investigation into the event, finding:

- 36 litres of hydraulic oil (BIOBAR 46) was required to refill the Shiploader long travel brake HPU.
- Less than 5 litres of BIOBAR 46 entered the water beneath berth.
- Karara's ERT and maintenance team recovered hydraulic oil from spill trays and cleaned up material from infrastructure using spill pads, estimated to be around 30 litres.

Castrol BioBar is a range of environmentally acceptable hydraulic fluids recommended for hydraulic equipment where leakage or spillage may result in escape into the marine environment.

Cause (or suspected cause) of non-compliance:

KML investigation determined the cause of the incident to be as a result of the hydraulic brake line being in service for the entire duration of KML Berth 7 Operations (~8.5 years).

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

KML share the results of their internal investigation which have been captured in MWPA incident IN-25980 along with MWPA N1 Report form submitted to DWER. KML also reported the event to DoT.

Section E – Details of non-compliance with licence condition	
KML replaced all remaining hydraulic brake lines at the completion of loading the vessel at berth at the time of the incident.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 30 / 10 / 2020 N1 Form

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.4.1 f	Date(s) of non-compliance:	09/08/2021
Details of non-compliance:			
<p>Licence Condition 1.4.1 f states <i>Notifications of a Trial must include a monitoring plan.</i></p> <p>While conducting loading trials of Construction Sand, the PM₁₀ sampling unit at Connell Road had water ingress and damage to the filter paper. The filter damage resulted in the sample being invalid and did not meet the requirements of the submitted monitoring plan.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>There was no environmental impact associated with this monitoring non-compliance.</p> <p>The Connell Road TSP sampling unit continued sampling for the loading period. The results were typical with TSP dust at 50.0ug/m³, Lead at 0.005ug/m³ and Manganese at 0.008ug/m³.</p>			
Cause (or suspected cause) of non-compliance:			
The invalid sample was likely due to a combination of rain and strong winds experience at the time of sampling.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The incident was recorded in CAMMS IN-25896.</p> <p>The Environmental Officer completed calibration checks on the HiVol Unit prior to restarting next sample run.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally			
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 26 / 10 / 2020 L4275/1982/15 - Quarterly Air Quality Monitoring Report (July - September 2020)	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	21 – 22/08/2020
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates as TSP and PM₁₀ shall be continuous during shiploading events.</p> <p>EMR zinc concentrate was being loaded at Berth 4 onto MV EOS Esperance between the 19th and 21st of August 2021. A miscommunication between a BHF Operator and Operations Supervisor resulted in two missed high-volume (HiVol) air samples during this concentrate shipment; one on Friday 22/08/2020, and the second on Saturday 23/08/2020. The Operator responsible for HiVol monitoring over the weekend left work sick on 22/08/2020, he let his Supervisor know that a fellow Operator would have to conduct the work. This message was forgotten to be passed onto that Operator at the shift handover.</p> <p>The HiVol sample was scheduled for retrieval on the 22/08/2020 was not collected. Therefore, the concentrate sample deployed on the 21/08/2020 became invalid as the HiVol exceeded its 24-hr run time and the 'Post-Concentrate' sample planned for the 22/08/2020 was not deployed.</p> <p>A BHF Operator retrieved the invalid sample and deployed another concentrate sample on the 23/08/2020 which was deemed a 'Background' sample as loading finished two days earlier.</p> <p>This non-compliance was reported to DWER in MWPA Quarterly Air Quality Monitoring Report (Q1 20/21) on the 26/10/2020.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were no environmental impacts as a result of this environmental monitoring non-compliance. MV EOS Esperance was loading zinc the sample period. Zinc does not have any targets or limits for TSP or PM₁₀ stated in the Environmental Licence.</p> <p>All compliance monitoring stations are equipped with TEOM real-time air quality monitors which continuously monitor particulates as PM₁₀. No air quality monitors exceeded the 24-hr PM10 target of 50ug/m3. The PM₁₀ results are summarised below:</p> <ul style="list-style-type: none"> 21/08/2020: PW: 17.14 ug/m3, CR: 21.47 ug/m3, LR: 13.23 ug/m3, B1: 10.07 ug/m3 22/08/2020: PW: 27.30 ug/m3, CR: 27.60 ug/m3, LR: 16.57 ug/m3, B1: 18.54 ug/m3 			
Cause (or suspected cause) of non-compliance:			
<p>Incident IN-25907 was investigated, and the contributing factors identified were:</p> <ul style="list-style-type: none"> Human error/failure of Operations Supervisor to assign the weekend sampling role to another Operator. 			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

Section E – Details of non-compliance with licence condition	
<p>Improvements were made to clarify and communicate importance of sampling requirements. The actions taken include:</p> <ul style="list-style-type: none"> • Landside Operations Superintended was notified of incident, who discussed and reinforce the importance of compliance monitoring directly with Operations Supervisors; and • Additional training was provided for Operation Supervisors. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 26 / 10 / 2020: L4275/1982/15 - Quarterly Air Quality Monitoring Report (July - September 2020)

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	27/08/2020
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates as Total Suspended Particulates (TSP) shall be continuous during shiploading events.</p> <p>On 27th of August 2020 high-volume (HiVol) air sampling of TSP at Lemmon Road (LR) during a post shipment concentrate sample was not obtained. The LR TSP HiVol unit failed at some stage during the 24-hour sample period. It is unknown when the sample stopped and no data could be recovered from the unit, therefore the sample was deemed invalid. The unit failure was caused by an electrical fault internal to the sampling unit.</p> <p>This non-compliance was reported to DWER in MWPA's Quarterly Air Quality Report submitted on the 26/10/2020.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were no environmental impacts as a results of this environmental monitoring non-compliance. Whilst the LR TSP HiVol sample for 27/08/2020 was deemed invalid, it was a post-concentrate sample and no concentrate products were being loaded within the 24-hour period. Particulates as PM₁₀ were still monitored continuously during the event via the PM₁₀ HiVol and the TEOM (real-time monitor) at Lemmon Road.</p> <p>Monitoring results from the LR compliance monitoring station indicated low levels of particulates with results the PM₁₀ 24-hr average being 28.85 ug/m³.</p>			
Cause (or suspected cause) of non-compliance:			
Incident IN-25933 was investigated and the cause of the non-compliance was attributed to an internal electrical fault as determined by the site Electrician.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The faulty HiVol was removed from service and spare unit installed before the beginning of the next concentrate sample.</p> <p>MWPA has experienced issues with HiVol units in the past and as such holds spare units available to be installed to prevent further non-compliances from occurring.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 26/10/2020 L4275/1982/15 - Quarterly Air Quality Monitoring Report (July - September 2020)	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.3 & 4.3.1	Date(s) of non-compliance:	01/02/2021
Details of non-compliance:			
<p>Condition 4.3.1 requires MWPA to report any incident which has caused, is causing or may cause pollution.</p> <p>On 1st of February 2021 at 1800hrs approximately 1000-2000 tonnes of iron ore (fines) escaped the east end of Shed 13 due to a breach in the storage shed wall. The sheet metal designed to support the load collapsed and the iron ore product spilt over the top of the concrete wall.</p> <p>The spillage was covered with tarpaulins and was removed during shiploading on the 24/02/2021.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>All the material was retained within the Mineral Storage Area within the Prescribed Premise boundary. There was no impact to stormwater and the material was tarped to prevent dust lift off.</p> <p>Dust extraction systems remained operational during the period however the negative pressure to achieve optimal performance was likely compromised.</p> <p>The predominant wind conditions between the 1st and 24th of February 2021 were from a south and south westerly direction. The eastern end of Shed 13 is shielded by storage sheds to the south and east and therefore no PM10 exceedances during this period were attributed to this incident.</p> <p>All the iron ore product was recovered using a bobcat, along with any of the impacted aggregate subbase.</p>			
Cause (or suspected cause) of non-compliance:			
The cause of the non-compliance was the structural failure of the shed wall.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The customer sourced an alternative storage option within the iron ore shed on Berth 5, Lease 26. The structural integrity of the shed was assessed by a qualified engineer prior to the sheeting being reinstated.</p> <p>The N1 Form Part B was submitted to DWER on the 26th of February confirming recovery of the material and providing photos of the cleanup.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 02 / 02 / 2021 N1 Form	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.3.1	Date(s) of non-compliance:	11/02/2021
Details of non-compliance:			
On the 11 th of February 2021 a Level 2 marine oil spill occurred within the Commercial Harbour at Berth 5 of the Geraldton Port. An estimated 2m ³ of heavy fuel oil was discharged into marine environment from the de-ballasting operations conducted by MV Ya Tai 2.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
<p>The discharged oily ballast water created a thin film of oil approximately 200m in length and 30m wide. The oil was approximately 10mm in depth and covered less than 30% of the area. Booms were deployed by MWPA emergency response team. All visible oil was contained between the vessel and the rock face of Berth 5.</p> <p>Initial water quality samples were taken within the Boomed incident site alongside Berth 5. These samples confirmed returned Total Petroleum Hydrocarbons across C10-14, C15-28, C29-36 and C>36. TPH C15-28 returned the highest concentrations of 36 mg/L consistent with heavy fuel oil.</p> <p>Most of the oil was recovered within 24 hours of the event. A total of 2.3T of hydrocarbon contaminated materials (boom and spill pads) were disposed of via Veolia at the Meru Waste Special Burial Class III Disposal Facility.</p> <p>Water quality monitoring was conducted for 3 weeks post incident clean up, in accordance with the DoT approved Oil Spill Recovery Phase Monitoring Plan. No detectable hydrocarbons were detected within the Commercial Harbour or reference sites post clean up. Therefore, the impact to water quality was short term and localized to the Berth 5 boomed area.</p>			
Cause (or suspected cause) of non-compliance:			
It was determined that MV Ya Tai 2 discharged the oil via is ballast water during loading on Berth 5.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The area was immediately boomed off to contain the spill. The oil was collected using sorbents. DoT was notified and mobilised to a rapid response team to assist MWPA with the cleanup operations. AMSA was notified and action was taken with the shipping company to ensure the vessel was surveyed and declared fit to sail.</p> <p>In conjunction with Western Australian State Environment and Scientific Coordinator (ESC) for Maritime Environmental Emergencies a Recovery Phase Monitoring Plan and Scientific Monitoring Communication plan approved by representatives of DoT and DWER.</p> <p>A Recovery Phase Monitoring Plan Report was issued to DoT in July 2021 to close out the event.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 11 / 02 / 2021: N1 Form	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	1.3.4	Date(s) of non-compliance:	17/02/2021
Details of non-compliance:			
<p>Condition 1.3.4 requires MWPA to ensure that measures are taken to prevent spillage entering the marine environment via the gap between the berth and vessel.</p> <p>On the 17th of February 2021 a grab and hopper arrangement were being used to unload a fertiliser vessel on Berth 6. During the final stages of unloading Muriate of White Standard Potash (MOP fertiliser), weather conditions changed resulting in spillage from the grab and hopper operations. The MOP material became wind-borne and spread along the berth. Spill plates were deployed on the southern side of the hopper below the slue path of the on-board vessel crane to deflect spillage onto the berth for recovery.</p> <p>Wind conditions changes in the last hour of loading and material was blown north of the hopper where there were no spill plates to capture and deflect material back onto the berth.</p> <p>Material was observed on the wharf fenders indicating that some of the product would have been discharged into the marine environment as a fine dust from the operations.</p> <p>MWPA reported the incident to DWER in accordance with Condition 4.3.1, which requires reporting of any incident which has cause, is causing or may cause pollution. DWER assigned incident reference number ICMS 60443.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The impact was very localised and short term in nature (approx. 1 hour). As MOP is soluble it may have contributed to an increase of nutrients in the marine environment. There was no visual impacts or immediate change to water quality observed. The harbour within Geraldton Port experiences a high degree of mixing due to wind, wave and surge conditions.</p> <p>The nearest Air Quality Monitoring Station to this operation is positioned at Connell Road. Dust levels were elevated for a short period between 1145 and 1230hrs, however the time weighted average PM₁₀ data remained well below licence limits (15.4ug/m3).</p>			
Cause (or suspected cause) of non-compliance:			
<p>Upon investigation the cause of the non-compliance was determined to be ineffective use of the spill deflector plates by the stevedoring company. The stevedoring company did not adapt to changing weather patterns as required.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

Section E – Details of non-compliance with licence condition

During the incident a road sweeper was in attendance as part to the normal operations. The sweeper recovered most of the windblown MOP product. Due to the bollard configuration, manual recovery of the material along the berth edge was achieved with brooms and a vacuum truck.

MWPA investigated the incident (IN-26103) which included review of the equipment being used to handle the product, spill plate design and placement, as well as operational and stevedore procedures. MWPA has commissioned the redesign of spill plates suitable to the new berth bollard arrangement.

The stevedoring company also submitted a separate incident investigation report to MWPA for review. The stevedoring company has implemented a new hopper for B6 operations with improved guarding to prevent spillage.

The results of the investigation were included within a Section 72 Waste Discharge Notification submitted to DWER on the 2/03/2021.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 18 / 02 / 2021: ICMS 60443

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.3.1	Date(s) of non-compliance:	24/02/2021
Details of non-compliance:			
<p>Condition 4.3.1 requires MWPA to report any incident which has caused, is causing or may cause pollution.</p> <p>On the morning of the 24th of February 2021 at 10:30am, during a non-routine washdown of Berth 5 shiploading equipment, washdown water containing iron ore dust was discharged to the commercial shipping harbour marine environment. The washdown activity was undertaken by MWPA operators and involved rising iron ore dust off the conveyor belt prior to loading construction sands over a 20 to 30 minute timeframe.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>An estimated 1,800L of washdown water containing a low portion of suspended dust fines was generated during the operations. The discharge resulted in a discoloured plume (red coloured) estimated to be approximately 60m long by 30m wide and it remained localised to the discharge location at Berth 5. The plume naturally dissipated, and the plume was no longer visible by 1230hrs.</p> <p>MWPA reviewed the results of the Sediment monitoring programs to determine if there were any adverse effects to the marine quality within the Commercial Harbour as a result of the plume:</p> <ul style="list-style-type: none"> The annual sediment sampling program at the Commercial Harbour have a historical trend of iron being present. The 2021 sampling program for Berth 5 sites, conducted between 23rd and 24th March, returned iron results consistent with historical trends at this berth location. <p><i>ANZECC/ARMCANZ 2000 Guidelines for Fresh and Marine Water Quality</i> recognises shipping ports and sections of harbours serving coastal cities as highly disturbed systems and recommends 95% ecosystem protection level be applied. No guideline value exists for iron, however the levels of iron recorded within the Commercial and Fishing Boat harbours indicate a minor enrichment by Port activities historically when compared with background levels within Champion Bay.</p> <p>These results demonstrate that the plume of turbid water did not cause any significant impact to the environment and no impacts to marine fauna were observed.</p>			
Cause (or suspected cause) of non-compliance:			
The non-routine washdown was conducted to comply with vessel Surveyor requirements. As no product was evident on the equipment the Operations Supervisor approved the activity unaware that washdown from this equipment is not approved to be released to the marine environment.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>To prevent recurrence of the non-compliance, a Safe Work Procedure has been developed to cover the washdown activities on Berth 5 and identifies several no discharge methodologies that can be use in future.</p> <p>MWPA investigate this incident (IN-26110) and the outcomes were reported to DWER via a Section 72</p>			

Section E – Details of non-compliance with licence condition	
Waste Discharge Notification on the 24/03/2021.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 24 / 02 / 2021 ICMS 60520

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.3.1	Date(s) of non-compliance:	12/03/2021
Details of non-compliance:			
<p>Condition 4.3.1 requires MWPA to report any incident which has caused, is causing or may cause pollution.</p> <p>During loading of a zinc concentrate vessel on Berth 4 on 12/03/2021, it was noted the shiploader (SL04) artic chute was visible above the hold of the vessel causing a small amount of zinc concentrate dust to become airborne and settle within the water within Berth 4 only. The chute was at an elevated position due to the vessel draft (vessel size) causing the stevedores to raise the chute briefly to direct material into an allocated space required for trimming the vessel.</p> <p>The Operations Supervisor stopped loading operations for approx. 30 minutes and loading resumed once the chute was confirmed to be lowered into the hold.</p> <p>The dust on the water was present for approximately 15 minutes before naturally dispersing. The Operations Supervisor continued close monitoring of the vessel throughout the remaining loading period to ensure the discharge chute remained low.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>It was estimated a small quantity of fine zinc concentrate dust entered the marine environment; the dust film covered an area approximately 50m² (25m x 3m). The impact was very localised to berth 4 and short term in nature, the fine material had dispersed in the water within 15 minutes.</p> <p>MWPA reviewed the results of the Passive Water and Sediment monitoring programs to determine if there were any adverse effects to the marine quality within the Commercial Harbour as a result of the emission:</p> <ul style="list-style-type: none"> Passive water monitoring results, for the period 3rd March – 19th April, showed a slight increase in Zinc at PWS3 (Berth 4 sample location) recording 4.73ug/L, but this remained below the Water Quality Guideline Triggers for the 99% ecosystem protection level marine water quality guideline for Zinc which is 7ug/L and 95% ecosystem protection level which is 15ug/L. The annual sediment sampling program at the Commercial Harbour has observed a historical trend of zinc being present. The 2021 sampling program for Berth 4 sites, conducted between 23rd and 24th March, returned results consistent with historical trends and indicate a slightly decreasing trend in zinc concentrations over time. <p>ANZECC/ARMCANZ 2000 Guidelines for Fresh and Marine Water Quality recognises shipping ports and sections of harbours serving coastal cities as highly disturbed systems and recommends 95% ecosystem protection level be applied. Therefore, the result is indicative of minimal impact to marine quality.</p>			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
MWPA investigated the non-compliance and determined the stevedores positioning of the chute above the hold of the vessel was the cause of the dust emission.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
MWPA logged the event as an incident (Reference IN-26122). A review of loading procedures will be undertaken by MWPA with the Stevedore company.	
<p>Note: After a second similar event on the 23rd of April 2021, MWPA determined the class of vessel loaded during the incident was unsuitable for loading of metal concentrates. MWPA has communicated to the customer and Shipping Agents its preference not to use this class of vessel on Berth 4 when loading metal concentrates.</p> <p>MWPA made an initial notification to DWER using the online pollution reporting tool and DWER incident number ICMS 60783 was assigned. A follow-up Section 72 Waste Discharge Notification was submitted on the 29/03/2021 summarising the actions taken and the results of the initial investigation.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 12 / 03 / 2021: DWER ICMS 60783

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	27/03/2021 – 28/03/2021
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates and metal parameters as TSP shall be continuous during shiploading events.</p> <p>No high-volume (HiVol) air quality TSP samples were collected at Connell Road during concentrate sampling on the 27th of March and post-concentrate sample 28 March. MV Bright Ocean copper concentrate vessel was being loaded on Berth 6 during this period.</p> <p>The TSP HiVol unit had an electrical trip causing it to fail upon deployment of the sample on the 27th of March. The unit was unable to be restarted by the operator assigned to weekend monitoring.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>Whilst the CR TSP HiVol failed, particulates were being monitored continuously as PM₁₀ via the CR TEOM and CR PM₁₀ HiVol.</p> <p>Monitoring results from the CR TEOM indicated little to no impact on the location during the operations, results below:</p> <ul style="list-style-type: none"> • 27/03/2021 - CR 39.17 ug/m3 • 28/03/2021 - CR 27.48 ug/m3 			
Cause (or suspected cause) of non-compliance:			
<p>Incident IN-26140 was investigated and the cause of the non-compliance was attributed to an internal electrical fault causing the unit to trip, as determined by the site electrician.</p> <p>The unit required manual resetting, which was completed by the more competent Monitoring Technician on Monday morning 29 March.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>MWPA developed a Troubleshooting Guide to assist operator who provide weekend monitoring coverage. The guide provides operators who conduct work over weekends and public holidays simple trouble shooting steps and options for obtaining assistance.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 29 / 04 / 2021 L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)	

Section E – Details of non-compliance with licence condition

Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	3.2.1	Date(s) of non-compliance:	27/03/2021 – 28/03/2021
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Details of non-compliance:

Table 3.2.1 of the Licence states emissions monitoring of particulates and metal parameters as PM₁₀ and TSP shall be continuous during shiploading events.

Port Way (PW) and Lemmon Road (LR) Air Quality Monitoring Stations experienced separate power outages on 28 March 2021;

- PW (0810 - 1320hrs) power outage caused by a planned Western Power maintenance outage at ATOM (power supplied to PW by ATOM), not communicated to MWPA prior to event.
- LR (0720 - 1005hrs) power outage was a planned MWPA maintenance outage, communicated prior to event.

During this time emission monitoring for Sandfire's copper concentrate loading was being conducted. MV Bright Ocean was being loaded on Berth 6 using Rotainers.

The power outage events caused the following samples to be invalid:

- TSP & PM₁₀ samples were deployed on the 27th and were due to complete a midday to midday sample run on the 28th so samples were invalid due to the run time being too short.
- TSP & PM₁₀ samples could not be deployed at PW on the 28th of March as there was no power available to commence monitoring.

The Licence states that *continuous monitoring is permitted to include gaps equating to no more than 2 hours in every 24-hour period*. Both LR and PW TEOM PM₁₀ results for the 28th March were considered invalid due to having data gaps greater than 2 hours. However, LR and PW TEOM PM₁₀ results for the 27th March were valid.

This non-compliance was reported to DWER in MWPA Quarterly Air Quality Monitoring Report submitted on 29/04/2021.

What was the actual (or suspected) environmental impact of the non-compliance?

NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

There were no environmental impacts as a result of this environmental monitoring non-compliance. MV Bright Ocean was loading copper concentrates (11,669 WMT) via Rotainers on Berth 6. Retainer boxes are considered best practice for loading bulk materials with respect to reducing fugitive dust emissions.

The HiVol sample being conducted on the 28th March was a post-concentrate sample, therefore no concentrates were being loaded in that 24-hour period. Whilst the PW & LR HiVols and TEOMs were invalid on this date, particulates as PM₁₀ were monitored continuously via the Connell Road and Berth 1 TEOMs and showed little to no impact of the operations on this date, results below:

- 28/03/2021 – CR 32.11ug/m3, B1 25.66 ug/m3

The 27th March was a concentrate sample, with vessel loading completing at ~1600 hours. The TEOM results for this period showed no impact to any of the monitoring locations, results below:

- 27/03/2021 – PW 24.93ug/m3, CR 39.17ug/m3, LR 42.36 ug/m3 and B1 22.17 ug/m3

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
<p>The cause of both power outages was planned maintenance to electrical distribution systems.</p> <ul style="list-style-type: none"> • Lemmon Road was a MWPA planned maintenance activity communicated prior to the event. • Port Way was a Western Power outage at ATOM Fuel, the PW monitor is powered from this location. ATOM did not notify MWPA of this planned power outage. <p>MWPA did not have alternative power supply available to ensure monitoring was uninterrupted.</p>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>It was requested that ATOM Fuel provide MWPA courtesy notification of any maintenance power outages that will affect the Port Way Air Quality Monitoring Station.</p> <p>MWPA procured back up generators during 2020 and during 2021 established necessary distribution infrastructure to link the generators to strategic areas of the Port. This should assist providing power to the LR monitoring location in future maintenance events. However, this hasn't provided a solution for the Port Way monitoring station which has yet to be investigated fully.</p> <p>MWPA Incident reference number IN-26139.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 29 / 04 / 2021 L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2 Schedule 2	Date(s) of non-compliance:	19/04/2021
Details of non-compliance:			
Schedule 2 of the Licence states 5 background samples must be completed per month for the purpose of calculating the Lead 3 month rolling average. On 19 th April 2021, the power supply of the Connell Road TSP sampling unit tripped causing the Connell Road background TSP sample to be invalid due to the sample having an insufficient run time.			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No impacts to environment were expected as a result of this monitoring non-compliance.			
The invalid background sample occurred 21 days after the last lead concentrate vessel loaded. There were 3 background samples conducted in the period since the last concentrate vessel loaded, all of which returned typically low lead levels of 0.01ug/m3, 0.01ug/m3 and 0.01ug/m3.			
It is unlikely the invalid background sample would significantly affect the three-month average.			
Cause (or suspected cause) of non-compliance:			
Heavy rainfall and high wind conditions resulting in water ingress into the HiVol unity is the likely cause for the power supply to the Connell Road sampling unit tripping.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The unit was checked and restarted by an electrician.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 07 / 2021 L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.3.1	Date(s) of non-compliance:	23/04/2021
Details of non-compliance:			
<p>Condition 4.3.1 requires MWPA to report any incident which has caused, is causing or may cause pollution.</p> <p>During the 23rd of April 2021 a vessel on Berth 4 was being loading with zinc concentrate, a thin sheen of zinc concentrate dust was observed forming on the water near the vessel and extending in a westerly direction.</p> <p>During this time the shiploader artic chute was visible above the hold of the vessel causing a small amount of zinc concentrate dust to become airborne and settle within the water of the harbour. The MWPA Wharf Supervisor contacted the Stevedore to ensure they were keeping the chute as low as possible to control emissions.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>The impact was localised and temporary in nature. The zinc concentrate dust was limited in extent between Berth 4 and Berth 5. The fine dust material had naturally dispersed into the water column within 45 minutes of shiploading ending. No impacts to marine fauna were observed.</p> <p>MWPA reviewed the results its Passive Water and Sediment monitoring programs to determine if there were any adverse effects to the marine quality within the Commercial Harbour as a result of the emission:</p> <ul style="list-style-type: none"> Passive water monitoring results, for the period 27th May – 11th June, showed a slight increase in zinc at PWS3 (the Berth 4 sample location) recording 5.63ug/L, but this remained below the Water Quality Guideline Triggers for the 99% ecosystem protection level marine water quality guideline for zinc which is 7ug/L and 95% ecosystem protection level which is 15ug/L. The annual sediment sampling program at the Commercial Harbour has observed a historical trend of zinc being present. The 2021 sampling program for Berth 4 sites, conducted between 23rd and 24th March, returned results consistent with historical trends and indicate a slightly decreasing trend in zinc concentrations over time. <p>ANZECC/ARMCANZ 2000 Guidelines for Fresh and Marine Water Quality recognises shipping ports and sections of harbours serving coastal cities as highly disturbed systems and recommends 95% ecosystem protection level be applied. These results demonstrate that the zinc dust did not contribute to significant change in marine quality.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of the emission has been attributed to the air gap between the shiploader (SL04) artic chute and the vessel hold, due to the low profile of the vessel during the final stages of loading allowing fine dust from the product to mobile and become airborne.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the			

Section E – Details of non-compliance with licence condition	
non-compliance:	
<p>IN-26165 was logged in MWPA Incident Management System CAMMS. This was the second incident relating to zinc dust emissions to the marine environment on this Berth using the same style vessel. Previously reported incident (IN-26122) occurred only weeks earlier on 12/03/2021. These incidents are identical in the cause of the non-compliance.</p> <p>MWPA has communicated to its Customers and Shipping Agents that the Port would prefer not to load these low-profile vessels and requested that this vessel type not be booked for the transport of metal concentrate products at Berth 4. This is due to the incompatibility between the Berth 4 Shiploader and its ability to effectively load material into certain areas of the hold without having to raise the artic chute above the vessels hold. MWPA Customers have been supportive and agreed not to use these vessels on Berth 4.</p> <p>MWPA submitted a Section 72 Waste Discharge Notification on the 6th of May 2021 with the outcomes of the initial investigation.</p>	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 23 / 04 / 2021: Online Pollution Report

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	28/04/2021
Details of non-compliance:			
<p>Table 3.2.1 of the Environmental Licence states emissions monitoring of particulates as PM₁₀ and TSP is to be continuous during shiploading events.</p> <p>On 28th of April 2021, the high-volume air samples (both PM₁₀ and TSP) were required to be collected for the Sandfire copper concentrate loading on vessel <i>MV East Ayutthaya</i> and the required filters were not deployed by the MWPA Safety & Sustainability Monitoring Technician.</p> <p>The technician read the shipping schedule wrong and thought the vessel was commencing loading the following day. The technician deployed the samples required from the 29/04/2021 onward.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were no environmental impacts as a result of this environmental monitoring non-compliance. <i>MV East Ayutthaya</i> loaded 11,302 WMT of copper concentrate on Berth 6 from 28/04/2021 1315hrs to 30/04/2021 0510hrs, via containers on Berth 6. Rotainer boxes are considered the best practice for loading bulk materials with respect to reducing fugitive dust emissions.</p> <p>All TEOM real-time air quality monitors were in operation at each of the monitoring stations and continuously monitoring particulates as PM₁₀. The 24-hour time weighed average for each TEOM on 28/04/2021 were as follows: Connell Road 72.50ug/m3, Lemmon Road 58.79ug/m3, Port Way 42.57ug/m3 and Berth 1 37.62ug/m3.</p> <p>During this period Connell Road and Lemmon Road exceeded the 24-hour PM10 target emission (50ug/m3). The Operations Log noted dust emanating from mineral sands loading operations on Berth 4 and did not indicate any evident of dust from the Berth 6 operations. The Offsite background monitor was also >40ug/m3, indicating that regional dust played a large part in the elevated results being experience at the Port boundary.</p>			
Cause (or suspected cause) of non-compliance:			
MWPA IN-26176 was logged in CAMMS and the root caused was identified as human error. The newly appointed Safety & Sustainability Monitoring Technician had incorrectly read the shipping schedule. The concentrate shipment had been rescheduled several times as a result of surge and weather conditions. The schedule had changed several times in the preceding 24hrs.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
As the Safety & Sustainability Monitoring Technician was newly appointed to the position, refresher training was conducted to ensure the technician was aware of all ship scheduling correspondence when planning monitoring activities, to ensure the most up to date schedule is being referenced.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			

Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 30/07/2021: L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	Table 3.2.1	Date(s) of non-compliance:	09 May 2021
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states a reportable target for Copper as PM₁₀ as 1.0 ug/m³.</p> <p>On 9th of May 2021, a PM₁₀ sample returned a Copper result of 1.3ug/m³ at the Lemmon Road Air Quality Monitoring Station.</p> <p>DWER were notified of this ambient air quality target exceedance in writing, within 7 days of becoming aware of the exceedance, on 18 June 2021.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>During this period two vessels were in Geraldton Port loading copper concentrate;</p> <ul style="list-style-type: none"> • <i>MV East Ayutthaya</i> was loaded with 11,609 WMT of EMR copper concentrate and 6,014 WMT of EMR HPM concentrate via shiploader on Berth 4. • <i>MV African Falcon</i> was loaded with 11,601 WMT of Sandfire copper concentrate on Berth 6 via rotainers. Loading commenced at 1135hrs 09 May 2021 and completed 1845hrs 10 May 2021. <p>Only one day of the two copper concentrate loading days (09 and 10 May) recorded an exceedance of the Licence copper target.</p> <p>Based on the investigation, including wind conditions and operational data analysis, it appears the slightly elevated copper concentration were only present for a short period of time and limited to a localized area of the port precinct.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Based on the investigation submitted to DWER, MWPA considers the Berth 4 copper loading operations (<i>MV East Ayutthaya</i>) and combination of easterly winds, and the increasing wind speed during vessel hatch trimming activities likely contributing factors of this exceedance.</p> <p>MWPA confirmed the following controls were in place and functioning.</p> <ul style="list-style-type: none"> • MWPA <i>Loading Metal Concentrate – Berth 4 BHF Procedure</i> copper concentrate product wind limit and tonnage restrictions were complied with. • MWPA <i>Loading Metal Concentrate – Berth 4 BHF Procedure</i> concentrate product Berth 4 and Berth 6 simultaneous loading of copper concentrate complied with. • MWPA <i>Loading Packaged Bulk Minerals Procedure</i> product wind limits complied with. • Vacuum truck was on Berth 4 during loading to recover spilled material. • Road sweeper was on Berth 6 during loading and used to recover spilled material. • Vessel Moisture Certificates were obtained for each vessel – <ul style="list-style-type: none"> ○ <i>MV East Ayutthaya</i> Moisture Certificate indicated the average shipment moisture content to be 7.61% for the Copper parcel. The initial pre-shipment moisture was estimated to be 8.2%. ○ <i>MV East Ayutthaya</i> Moisture Certificate indicated the average shipment moisture content to be 7.0% for the HPM parcel. The initial pre-shipment moisture was estimated to be 8.2%. 			

Section E – Details of non-compliance with licence condition	
<ul style="list-style-type: none"> ○ <i>MV African Falcon</i> Moisture Certificate indicated the pre-shipment moisture to be 9.9%. • Envirosuite alarms – Key MWPA personnel receive automated alerts generated from the software used to manage real time monitoring data. These alerts are set as triggers for action prior to reaching licence limits for PM₁₀ data. Short term PM₁₀ levels triggered and sent alerts as a result of rising dust levels at Lemmon Road. • The PM₁₀ daily target was not exceeded at any of the compliance monitoring stations with the highest 24hr average recorded at Lemmon Road, being 37.77 µg/m³. 	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • MWPA established the laboratory conducted repeat the analysis of PM₁₀ to confirm the reported result was correct. The laboratory conducted two separate analyses on the sample as a part of their quality assurance requirements. • Incident IN-26231 was logged in MWPA CAMMS incident database. MWPA have undertaken initial data analysis, reviewed shift logs and conducted interviews with operational personnel and stevedores to assist in identifying potential causes. • Weather and prevailing wind conditions at the time of loading has been assessed. • MWPA have undertaken a review of past copper exceedances to compare weather conditions and review controls implemented to prevent reoccurrence. • Statement of Facts and Moisture Certificates have been obtained from each vessel. • MWPA committed to reviewing operational procedures including the <i>Managing Dust from Port Operations Procedure</i>. This review is focused on how Envirosuite dust alarms are actioned, escalated and corrective actions are logged. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 18 / 06 / 2021: DWER INC# 61854

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	18-19/05/2021
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates as TSP and PM₁₀ shall be continuous during shiploading events.</p> <p>On the 18th and 19th of May 2021 the high-volume air samples (both PM₁₀ and TSP) at Port Way and Berth 1 were invalid due to an electrical fault.</p> <p>MV Basic Pioneer was being loaded with Zinc Concentrate on the 18th and 19th May 2021.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were no environmental impacts associated with this monitoring non-compliance.</p> <p>For the two days of loading the wind conditions were predominantly from the South and the East. The two monitoring stations downwind of the loading operations were Connell and Lemmon Road which sampled continuously during this period.</p>			
Cause (or suspected cause) of non-compliance:			
A damaged power line affected the power supply to Port Way and Berth 1 High Volume air samplers. The damage was a result of a traffic incident on Marine Terrace. The fault caused the samples to have insufficient run times for the samples to be valid.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The event was entered into MWPA's incident database (CAMMs) reference IN-26194.</p> <p>No further action was taken.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 07 / 2021: L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	27/05/2021
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates as PM₁₀ shall be continuous.</p> <p>The TEOM (real-time air monitor) at Connell Road was in fault from 0135hours to 0735hours on the 27th May 2021. The unit was not sampling for a period of 6 hours.</p> <p>MWPA monitoring technician checked on the unit late in the morning, at which stage the unit was sampling correctly. No obvious reason for the fault was found.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>There were no environmental impacts associated with this monitoring non-compliance.</p> <p>There were no metal concentrates loaded on the 27th of May ships alongside Berths 3, 4, and 7 were loading wheat, zircon, and iron ore, respectively.</p> <p>For the period of the outage the wind was from the East North East. Connell Road being positioned on the North West boundary was unlikely to have collected any Port originated dust, had it been sampling correctly.</p>			
Cause (or suspected cause) of non-compliance:			
The cause of the non-compliance could not be identified.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The TEOM unit was checked by a specialist technician as part of MWPA's routine calibration and maintenance schedule and no faults were found.</p> <p>MWPA's incident reference IN-26214 (CAMMS).</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 30 / 07 / 2021: L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)	

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.2.1	Date(s) of non-compliance:	04 th June 2021 to 07 th June 2021
Details of non-compliance:			
<p>Table 3.2.1 of the Licence states emissions monitoring of particulates and metal parameters as PM₁₀ and TSP shall be continuous during shiploading events.</p> <p>Port Way (PW) Air Quality Monitoring Station experienced a power outage on 07th June 2021.</p> <p>At 1700hrs PW experience an unplanned power outage at ATOM occurred. Power is supplied to PW by the neighbouring property (ATOM) and supplied power to both the High Volume (HiVol) and Real Time (TEOM) air quality monitors.</p> <p>During this time emission monitoring for MV Eco Splendor copper concentrate was being conducted. The power outage event caused the TSP & PM₁₀ sampling to be invalid on the 07th June. The sample was invalid due to insufficient HiVol run time.</p> <p>The Licence states that '<i>continuous monitoring is permitted to include gaps equating to no more than 2 hours in every 24-hour period</i>'. The Port Way air quality monitoring station experienced intermittent power outages from the 04th June to the 07th June 2021.</p> <p>PW TEOM PM₁₀ results for the 04th, 05th, 06th, and 07th June remained valid due to having no data period greater than 2 hours.</p> <p>This non-compliance was reported to DWER in MWPA Quarterly Air Quality Monitoring Report submitted on 30/07/2021.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No environmental impact resulted from this monitoring non-compliance.</p> <p>The wind on the for the 07th June, for the HiVol sampling period, ranged from Easterly to South Easterly. The PW sampling location was outside of the area of influence for Copper Concentrates loading. Lemmon Road and Connell Road were downwind of loading operations and continuously sampled for the duration.</p> <p>For the period of the 04th June to the 7th June 2021 wind was generally from the South and East. For this period PW was downwind of loading operations for a total 1 hour 55 minutes.</p>			
Cause (or suspected cause) of non-compliance:			
Unexpected power outages.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

Section E – Details of non-compliance with licence condition

An external contractor was called to check PW monitoring equipment and the TEOM unit. The data logger required to be re-set, so that the Envirosuite software used by MWPA could be used to remotely checked the status of equipment an ensure it is working correctly.

ATOM was reminded to notify MWPA of any planned power outages, who advised that some of the Western Power infrastructure suppling the PW monitor has now been repaired and replaced.

MWPA's incident reference IN-26227 (CAMMS).

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date:

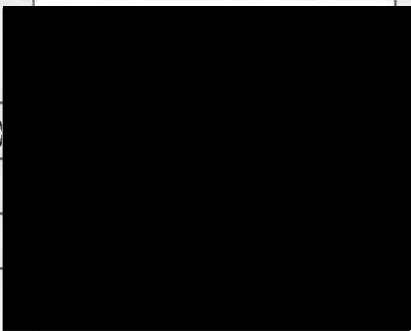
☒ Reported to DWER in writing

Date: 30 / 07 / 2021: L4275/1982/15 - Quarterly Air Quality Monitoring Report (April - June 2021)

Section F – Declaration

I / ~~We~~ declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹.

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

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		Date:	
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.