

# **Annual Audit Compliance Report Form**

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L8937/2015/1 (dated 20 June 2022)	Licence file number:	DER2015/002837
Licence holder:	Pilbara Ports Authority		
Trading as:	Pilbara Ports Authority		
ACN:	ABN 94 987 448 870		
Registered address:	The Esplanade, Port Hedland WA 6721		
Reporting period:	1 / 07 / 2022 <b>to</b>	31 /06 /2023	

### 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)

 $\Box$ 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 at Section F.

### Section C – Statement of Actual Production

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

Prescribed Premises Category	Actual Production Quantity
58, 58A	20,013,379 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	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:	1	Date(s) of non- compliance:	4 April 2023
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Details of non-compliance:

The Department of Water and Environmental Regulation (**DWER**) undertook a compliance inspection of the Utah Point Multi-User Bulk Handling Facility (**Premises**) on 4 April 2023 (the **Compliance Inspection**) to assess Pilbara Ports Authorities (**PPA**) compliance with the conditions of Licence L8937/2015/1 (**Licence**). During the inspection it was identified that some site infrastructure and equipment specified and described in Columns 1 and 2 of Table 10 in Schedule 3 was not maintained and operated in accordance with the requirements specified in Column 3 of Table 10 in Schedule 3. Specifically:

- Bunker sprays were not in operation during tipping events into the stackers where visible dust was being generated;
- Stacker sprays were not in operation whilst ore was being stacked; and
- Bunker sprays at open bunkers (bunker 6 and 7) were not in operation during tipping.

DWER inspectors also noted that a small shrub had grown in the stormwater recirculation pond which they believed could have potentially compromised the HDPE liner. In DWER's inspection report, sent to PPA on 29 June 2023, DWER indicated that this was a non-compliance and that the HDPE liner had become compromised. PPA can confirm that the recirculation pond was cleaned following the inspection including removal of accumulated sediments and vegetation. PPA can confirm that the liner was not compromised. Evidence will be provided to DWER separately when PPA provides DWER a response to the inspection report.

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.

Failure to operate these dust controls could increase the potential for dust emissions while tipping products over the bunkers and stacking. This could then contribute to cumulative dust emissions at downwind locations.

No Reportable Events or Management Triggers for dust as PM<sub>10</sub> were triggered on this day.

Cause (or suspected cause) of non-compliance:

A number of different causes contributed to the non-compliances:

- Bunker sprayers at all bunkers (excluding bunker 6 and 7) are required to be operated whenever visible dust is being generated while tipping ore into hoppers. During the inspection the contractors responsible for operating the bunker sprayers had indicated that they had not turned the bunker sprayers on because the products were not dusty and that they couldn't see visible dust from monitoring screens within the control room. This indicated that they didn't understand DWER's intent with the Licence condition being that the sprayers should be operated if any visible dust can be seen with the intent that controls need to be applied even to low dust emissions in order to control any potential contributions to the cumulative impact of dust on the airshed of Port Hedland.
- Of the two stackers which were identified to have sprayers not operating, one had faults which prevented the sprayers from being able to be turned on and the other had been turned off at the time of the inspection.
- The bunker sprayers at bunkers 6 and 7 had not been set on automatic at the time of the

inspection.

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

DWER has recorded the non-compliance in their Incident and Complaints Management System (**ICMS**), reference number 70187, and correspondence regarding site infrastructure and equipment is ongoing between DWER and PPA.

Controls being implemented in order to prevent recurrence of these non-compliances include:

- PPA has directed the contractors responsible for operating the bunker sprayers that they
  are to be operated at all times to avoid any subjective assessment of whether visible dust
  is present.
- The stacker sprayers which weren't operational during the inspection have been repaired.
- A full audit was completed of all dust control systems to ensure that they are operational.
- Routine operational inspections and preventative maintenance inspections are undertaken of all plant and infrastructure at the Premises. Operational and maintenance personnel have been directed to make dust control systems a focus when undertaking these inspections.
- A project has been initiated to better automate dust control systems onsite to reduce opportunities for systems to be manual turned off.

#### Was this non-compliance previously reported to DWER?

igvee Yes, and	
Reported to DWER verbally	Date: 4 /03/2023 – DWER Inspection
Reported to DWER in writing	Date:

#### 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	Date(s) of non- compliance:	4 April 2023
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Details of non-compliance:

Condition 4 of the Licence requires that PPA calculate and maintain an Average Monthly Availability rate of 90% or more for all water sprays on stackers, chute sprays at transfer stations and ship loader and stockyard water cannons when ore is stockpiled in that stockyard.

In the inspection report associated with the Compliance Inspection undertaken on 4 April 2023, DWER made the following assessment:

"In correspondence dated 28 April 2022 (DWERDT777816), the Licence Holder provided the March 2023 Calculation of Availability of Stacker Sprays, Chute Sprays and Stockyard Water Cannons (March Availability Report).

The March Availability Report outlined:

- Water sprays on stackers maintained a 78.9% availability.
- Chute sprays at transfer stations and ship loader maintained an availability of 100%.

• Stockyard water cannons maintained a 96.4% availability.

At the time of inspection, Officers observed water sprays on stackers that were not in operation during the stacking of stockpile 1 and 13. The automated system monitoring spray operations in the control room showed that that the sprays appeared to be operational on stockpile 1 and 13.

The Licence Holder advised in the March Availability Report that the infrastructure limitations at the premises mean that real time operational monitoring of chute sprays and stockyard cannons cannot be achieved. As such availability is assumed unless inspections or planned maintenance is conducted. This current method is not sufficient to adequately determine equipment availability."

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.

Failure to operate these dust controls could increase the potential for dust emissions during handling of bulk products at the Premises. This could then contribute to cumulative dust emissions at downwind locations and sensative receptors.

No Reportable Events or Management Triggers for dust as  $PM_{10}$  were triggered on the day of the inspection.

Cause (or suspected cause) of non-compliance:

PPA currently uses manual calculations to calculate Monthly Availability Rates.

The current set up of the control system and infrastructure at the Premises does not allow for real-time, automated calculation of Monthly Availability Rates. This is due to a combination of limitations with the programming of the control system software as well as lack of instrumentation required to automate monitoring of Monthly Availability Rates of dust controls.

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

DWER has recorded the non-compliance in their ICMS, reference number 70189, and correspondence regarding dust suppression availability is ongoing between DWER and PPA.

PPA are currently working through a range of projects to improve management of dust emissions from the Premises including improving the automation of calculations of Monthly Availability Rates and systems to improve these rates. The delivery of proposed upgrades to PPA dust control systems are being undertaken following PPA's project management framework which follows a process of:

- Project endorsement approval is given by the business to further scope a project;
- Design and scoping used to develop a business case;
- Business case provides costing and options for a project. If approved capital spending can then be undertaken on the project; and
- Project delivery.

Many of these projects are currently in scoping phases with latest technologies, dust suppression equipment and technical findings being reviewed during this stage in preparation of the business case. PPA would like to highlight that we require the flexibility to assess a range of

options to develop the best site specific, fit for purpose outcome to manage dust emissions associated with our operations. As such, the projects described may undergo further development resulting in changes to the options described or other options may be selected based on technical findings and engineering solutions development. The decision on what dust suppression options, if any, will be implemented will depend on the strength of their business case which will depend on the effectiveness of the dust controls, assessment of alternative options and cost effectiveness.

#### **Dust Suppression – Water Cannons Functional Specification**

This project is intended automate and improve the control over the water cannons used for dust suppression at Stockyard 1 (**SY1**). The project is being implemented incrementally through PPA's maintenance budget with a number of improvements having already been delivered. A draft functional specification has been developed to improve the automation of utilisation of the water cannons including optimisation and response to weather data including:

- wind speed and direction cannon selection optimised to provide coverage of stockpiles on the basis of wind conditions;
- evaporation automation of additional cannon runs during conditions likely to dry stockpile surfaces; and
- optimisation of utilisation improvement of rules and systems to control when and how cannons can be turned off automated run times.

Further stakeholder consultation and integration of systems between the operational contractor and PPA will be required to determine the final specifications implemented.

### Pumphouse Control System Upgrade

A project request has been endorsed for upgrades to the control system for the pump house which supplies process water for dust suppression and plant washdown. The project is intended to resolve issues with pressure fluctuations as new water uses come online (i.e. plant washdown during water cannon runs) and as such improve the effectiveness and automation of dust control systems onsite. Works are currently progressing towards scoping of the project in preparation of development for a business plan.

#### Water Quality Improvement

A project request has been endorsed to improve water quality on site. Three components for the water quality improvement were identified:

- 1) reduction of sediment in recycled stormwater used in the process water system on site by implementing silt curtains in the stormwater dams;
- 2) further reduction of sediment in water by implementing water clarifier for the stormwater; and
- 3) automating chlorine dosing in the three water tanks on site.

The above improvements are expected to result in extended site water and dust suppression infrastructure life. This becomes more prudent as smaller nozzles and sprays are expected to be used to produce appropriate water particle size at high pressures.

### Citect system upgrade

This upgrade will allow PPA to collect larger data sets for future analysis and site improvements, including those related to dust suppression on site. It will also allow for the remote access to the

site Controls system which will improve maintenance and operation response times and access by multiple users.

Yes, and	
Reported to DWER verbally	Date: 4/03/2023 – DWER Inspection
Reported to DWER in writing	Date: 28/04/2023 – PPA to DWER compliance inspection information request response

## 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:	19	Date(s) of non- compliance:	28 August 2022, 05 November 2022,
		•••••	26 April 2023

Details of non-compliance:

Condition 19 of the Licence requires that, where the Dust Extinction Moisture (**DEM**) level can be determined for a Distinct Bulk Granular Material specified in Table 9 of Schedule 2, that PPA must achieve a compliance rate of at least 95% of that material having a Moisture Content at or above the DEM level.

The averaging period for calculation of the compliance rate is not specified in the Licence. To align with quarterly reporting requirements under Condition 23 of the Licence, PPA has elected to calculate the compliance rate on a quarterly basis.

PPA has calculated the quarterly compliance rates for each material separately for Moisture Content provided by Premises Users under Condition 21, and Moisture Contents taken from sampling of out-loaded products under Condition 22. These results have been calculated separately due to differences in sample averaging frequencies making the results not directly comparable. Additionally, materials are blended during out-loading meaning the compliance rate needs to be calculated based on the groupings of materials which are blended (i.e., all iron ore fines products handled for a particular premises user).

For non-compliances with the 95% compliance rate occurred during the reporting period:

- Quarter 1 A single shipment (and only) of a new iron ore product was loaded through the facility. The material was non-compliant with the DEM compliance rate for both the material received at the facility and loaded onto the vessel;
- Quarter 2 an iron ore lump product was below the DEM compliance rate for the quarter with 89% of the material outloaded at or above the DEM; and
- Quarter 4 a manganese lump product was below the DEM compliance rate for the quarter with 57% of the material outloaded at or above the DEM.

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.

Handling and storage of Bulk Granular Material with a Moisture Level below DEM can potentially result in increased dust emissions from the Premises which may, during certain wind directions, potentially contribute to the cumulative dust levels within residential areas of Port Hedland.

Dust Monitoring Results indicate that:

- During the period which the new iron ore product was received at, stored and outloaded from the Premises (ship loading occurred between 28 and 29 of August 2022) there were no exceedances of Reportable Event criteria associated with any of the Monitoring Stations listed in the Licence.
- The iron ore lump product which was below the DEM compliance rate during Quarter 2 was loaded onto two vessels between 5 and 6 of November 2022. No exceedances of Reportable Event criterial associated with any of the Monitoring Stations listed in the Licence occurred during this period.
- No Reportable Events occurred during Quarter 4 and as such none occurred during loading of the manganese lump which was below the DEM compliance rate.

Cause (or suspected cause) of non-compliance:

The non-compliance during Quarter 1 occurred when a new Premises User started hauling a product to site and did not follow their approved Dust Management Plan which requires reporting the Moisture Content of product hauled to site and compliance with DEM to PPA on a weekly basis. A failure of internal communications within PPA meant that the department responsible for monitoring Moisture Content data was unaware that the haulage of the product to site had commenced.

The non-compliance during Quarter 2 for an iron ore lump product may have potentially occurred due to loss of moisture during storage and handling onsite.

An investigation into the non-compliance during Quarter 4 found that a laboratory error had occurred which could have potentially had a significant impact on the reported Moisture Content. During the investigation the Premises User requested moisture results from the Mn Lump from the vessel (China Energy) at the receiving Ports. The moisture results indicated that the product was above DEM at the two receiving Ports (3.48% and 3.42%).

Given that laboratory data for both the Mn Lump was above DEM both on delivery to the Premises (Utah Point) and at the receiving Ports it is likely that the low moisture content reported is largely due to the error in laboratory reporting. The Premises User has updated contractual arrangements with the laboratory to ensure that each individual sub-lot is analysed and reported separately to prevent any ongoing reporting issues.

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

Handing of the new iron ore product associated with the non-compliance with the DEM compliance rate in Quarter 1 was discontinued after the first and only shipment. To prevent recurrence of the incident with any future products handled at the Premises a standard agenda item has been added to the weekly cargo meeting for new Distinct Bulk Granular Materials and Premises Users to capture the commencement date of haulage of new products to the Premises and ensure that systems are in place to capture weekly haulage Moisture Levels and assess these against DEM for new products.

PPA issued a formal non-compliance notice to the Premises Users who had materials below the DEM Compliance Rate in Quarter 2 and Quarter 4. PPA is undertaking ongoing monitoring of product management at the facility and working with these Premises Users to minimise the risk of reoccurrence.

An internal investigation has been undertaken into sample handling and analysis procedures at the laboratory and procedures have been implemented by the laboratory to minimise the risk of reoccurrence of any laboratory error.

Was this non-compliance previously reported to DWER?		
$\boxtimes$ Yes, and		
Reported to DWER verbally	Date: / /	
Reported to DWER in writing	Date: 28/10/2023, 31/01/2023, 31/07/2023	

### 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.

			15 September 2022,
Condition no: 22	Date(s) of non- compliance:	1 November 2022,	
		5 November 2022,	
		6 November 2022,	
			7 November 2022

Details of non-compliance:

Condition 22 requires PPA to ensure that monitoring of the Moisture Content is undertaken during out-loading of vessels with a sample frequency of at least one sample per cargo hold, or at least one sample per 10,000 tonnes of material. With results required to be calculated as an average per 10,000 tonnes of material.

The laboratories which undertake the analysis are engaged under commercial agreements with the individual Premises Users. During the Reporting Period non-compliances with the averaging period occurred during loading of five out of the 189 vessels loaded. These events occurred on:

- 15 September 2023 when analysing samples collected via manual sampling during a breakdown at the sample station, it was identified that the laboratory analysed and reported the moisture results for five sublots of approximately 20,000 tonnes (not the required 10,000 tonnes); and
- 1 7 November 2023 during a breakdown of the sample station four consecutive vessels were loaded where moisture content was completed using the manual sampling procedure. The laboratory analysed and reported moisture results for each shipment as five sublots of approximately 20,000 tonnes.

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 was no actual or suspected environmental impact of this non-compliance as the noncompliance relates to environmental monitoring events which does not increase the risk of emissions or discharges.

Cause (or suspected cause) of non-compliance:

The non-compliances were caused by the laboratory averaging results for sublots of approximately 20,000 tonnes during manual sampling rather than the required 10,000 tonnes.

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

A review was undertaken of manual sampling practices at the Premises which found that sample sublots collected at the Premises during manual sampling were collected at a sufficient a frequency to allow the nominated laboratories to calculate the Moisture Content of products outloaded from the facility at an averaging frequency of 10,000 tonnes of bulk granular material.

PPA issued a notice to the Premises User requiring them to put contractual arrangements in place with their nominated laboratories to ensure that laboratory results are analysed and reported at the correct frequency as required under the licence.

Was this non-compliance previously reported to DWER?

 $\boxtimes$  Yes, and

Reported to DWER verbally	Date: / /
$\boxtimes$ Reported to DWER in writing	Date: 28/10/2022, 31/01/2023

#### 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:	25	Date(s) of non- compliance:	9 October 2022, 20 December 2022,
			28 February 2023,
			8 March 2023.

Details of non-compliance:

Condition 25 (d) requires that Monitoring at the M5, M7 and M10 Monitoring Stations is undertaken Continuously which is defined under the Licence as a data recovery rate of at least 90% per financial year quarter. Operation of the M7 Monitoring Station during Quarter 4 (Q4) of the Reporting Period was non-compliant with this requirement with a data capture rate of 55.8%.

Condition 25 (d) also requires that one 24 hour sample is collected from the M8 and M9 Monitoring Stations every sixth day, plus at least one 24 hour sample during the ship loading of manganese/spodumene. Condition 25(e) requires that these samples are collected in accordance with AS3580.9.6. During the reporting period four non-compliances occurred, all at the M9 Monitoring Station, these were:

- One scheduled 1 in 6 sample failed to be collected on 9 October 2022; and
- Three samples (two 1 in 6 samples and one during ship loading of manganese) were invalidated as they were non-compliant with AS3580.9.6. They occurred on 20 December 2022 and 28 February and 8 March 2023.

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

 $\ensuremath{\text{NOTE}}$  – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

There was no actual or suspected environmental impact of this non-compliance as the noncompliance relates to environmental monitoring events which does not increase the risk of emissions or discharges.

Cause (or suspected cause) of non-compliance:

The low Q4 data capture at M7 was due to a combination of a cyclone shutdown, flow sensor faults and a failure of the battery pack. The low data rate was also impacted because the contractor who supplies, services, and maintains the Monitoring Station had issues obtaining a timely supply of batteries to replace the failing battery pack. Additionally, new 290watt solar panels have been ordered and will be installed to replace 250watt panels during 2023.

Non-compliances associated with sampling at the M9 Monitoring Station were due to:

- 9 October 2022 a new control unit had been installed at the Monitoring Station which had an old version of the operating system (BIOS) resulting in incorrect date settings which resulted in a programming error for the scheduled sample run time;
- 20 December 2022 the sample run time did not meet the requirements of AS3580.9.6 which require that samples run for 24<u>+</u>1hr due to a power failure after which the instrument did not resume sampling due to an instrument fault; and
- 28 February and 8 March 2023 two samples were invalidated due to an instrument flow sensor fault which was only identified after the second sample had been collected.

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

Corrective actions implemented as a result of the low data capture rate during Q4 for the M7 Monitoring Station included unscheduled maintenance, a doubling of the frequency of ongoing solar panel cleaning at M7 and the maintenance contractor increasing their supply of spare batteries both in Port Hedland (two full sets of spare batteries for PPA) as well as their Perth Office (an extra shipping container has been ordered for storage of spare batteries).

Non-compliances associated with the M9 Monitoring Station were all associated with instrument faults and as such the contractor who supplies and maintains the equipment undertook unscheduled maintenance to resolve the faults associated with the instrument.

Was this non-compliance previously reported to DWER?			
$\boxtimes$ Yes, and			
Reported to DWER verbally	Date: / /		
Reported to DWER in writing	Date: 31/01/2023, 26/04/2023, 31/07/2023		

### 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:	31	Date(s) of non- compliance:	4 April 2023
Details of non-compliance:			

In the inspection report sent to PPA on 29 June 2023 in relation to the Compliance Inspection undertaken by DWER on 4 April 2023 DWER stated:

"At the time of inspection, Officers questioned whether the Licence Holder conducts the management actions outlined in Condition 31 when a trigger criteria exceedance occurs, and visible dust is not identified. The Licence holder confirmed the actions outlined in condition 31 are implemented. Officers however accompanied a member of operational team undertaking a dust exceedance investigation who advised that these actions are not implemented, stating that it didn't seem necessary if you couldn't identify the dust source."

PPA notes that at the time of the inspection the dust exceedance investigation undertaken was in relation to an internal dust alarm under PPA's dust management procedure which was recorded at the M7 dust monitor and was not undertaken in relation to a Management Trigger as defined in L8937/2015/1. No Management Triggers occurred on 4 April 2023.

During the Compliance Inspection PPA was able to provide evidence, recorded via email correspondence in PPA's dust reporting inbox, that the controls required by Condition 31 had been applied in relation to specific Management Triggers that DWER enquired about.

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 noncompliance took place.

Management Triggers at the Taplin Street dust monitor are indicative that weather conditions and dust levels could potentially be trending towards an exceedance of the Air Guideline Value (**AGV**) of  $70\mu g/m^3$  as a 24-hour average (midnight to midnight) for dust as PM<sub>10</sub>. Even if no visible dust sources are identified it is possible that low level dust emissions from the Premises could be contributing to overall dust levels in the airshed or that emissions of dust as PM<sub>10</sub> may be occurring that aren't visible to the naked eye.

By failing to implement these dust controls when a Management Trigger is identified and no visible dust source is identified there is potential that the Premises could be contributing to cumulative dust emissions within the Port Hedland airshed and potentially contributing, even in a minor way, towards an exceedance of the AGV.

Cause (or suspected cause) of non-compliance:

It is possible that miscommunication occurred during the Compliance Inspection as:

- DWER was asking the operator about controls that need to be applied in response to a Management Trigger; and
- The dust alarm being investigated at the time of the incident was an internal dust alarm set under PPA's procedures and dust levels had not triggered a Management Trigger. As this alarm was associated with wind directions that are not tending towards residential areas of Port Hedland and therefore could not contribute towards potential exceedances of the AGV. PPA's procedure does not require any control measures to be applied in relation to our internal dust alarms if no visible dust can be identified.

Any potential confusion in operators between the requirements in responding to Licence Management Triggers and PPA's internal dust alarms will be resolved by the implementation of PPA's new Dust Alarm Management System (see corrective actions below).

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

PPA has developed a new Dust Alarm Management System (DAMS) which has been rolled out since DWER's inspection and has been in active use since 1 May 2023.

DAMS guides operators through the process of responding to dust alarms, including those associated with Management Triggers as defined in L8937/2015/1 as well as PPA's own internal dust alarms. When responding to a Management Trigger in DAMS and no dust source is observed, the operator is prompted to ensure they are aware of all controls required by Condition 32 and required to confirm and record in the database that these controls have been implemented.

PPA's environment team has delivered one on one training in the use of DAMS to all operators responsible for investigating and responding to Management Triggers.

DWER has recorded the non-compliance in their ICMS, reference number 70190, and correspondence regarding dust suppression is ongoing between DWER and PPA.

Was this non-compliance previously reported to DWER?		
Yes, and		
Reported to DWER verbally	Date: 4 /03/2023 – DWER Inspection	
Reported to DWER in writing	Date:	

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:	32	Date(s) of non- compliance:	4 April 2023
Details of non-comp	bliance:		
Condition 31 and 32 are directly related to each other see details above in relation to Condition 31.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non- compliance took place.			
See details in relation to Condition 31.			
Cause (or suspected cause) of non-compliance:			
See details in relation to Condition 31.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the			

non-compliance:		
See details in relation to Condition 31.		
Was this non-compliance previously reported to DWER?		
🖂 Yes, and		
Reported to DWER verbally	Date: 4 /03/2023 – DWER Inspection	
Reported to DWER in writing	Date:	

### **Section F – Declaration**

I/We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Chief Executive Officer	Position:	
Date:	27 September 2023	Date:	
Seal (if signing under seal):			

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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.