Annual Return

EDL CSM (NSW) PTY LTD

NSW GOVERNMENT | Office of Environment & Heritage

ANNUAL RETURN

LICENCE NO	**5357**
LICENCE HOLDER	EDL CSM (NSW) PTY LTD
REPORTING PERIOD	03-May-2011 to 02-May-2012

If your licence has been transferred, suspended, surrendered or revoked by the EPA during this reporting period, cross out the dates above and specify the new dates to which this Annual Return relates below:

REVISED REPORTING PERIOD _____ / _____ / _____ **to** _____ / _____ / _____

(Note: the revised reporting period also needs to be entered in Section E)

THIS ANNUAL RETURN MUST BE RECEIVED BY THE EPA BEFORE 02-Jul-2012

Your Annual Return must be completed, including certification in Section E, and submitted to the EPA no later than 60 Days after the end of the reporting period for your licence.

Failure to submit this Annual Return within 60 days after the reporting period ends may result in:

- **the issue of a Penalty Notice for $750 (individuals) or $1500 (corporations);**

OR

- **prosecution.**

Please send your completed Annual Return by **Registered Post** to:

Regulatory and Compliance Support Unit
Office of Environment and Heritage
PO Box A290
SYDNEY SOUTH NSW 1232

It is an offence to supply any information in this form to the EPA that is false or misleading in a material respect, or to certify a statement that is false or misleading in a material respect.

THERE IS A MAXIMUM PENALTY OF $250,000 FOR A CORPORATION OR $120,000 FOR AN INDIVIDUAL.

Details provided in this Annual Return will be available on the EPA's Public Register in accordance with section 308 of the Protection of the Environment Operations Act 1997.

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Use the checklist below to ensure that you have completed your Annual Return correctly.
(✓ the boxes)

CHECKLIST		
☐	Section A:	All licence details are correct
☐	Section B1:	You have entered the correct number in the complaints table
☐	Section B2 – B3:	If there are tables, you have provided the required details
☐	Section C:	You have answered question 1, and 2 if applicable
☐	Section D:	If applicable, you have completed all load calculation worksheets
☐	Section E:	The Annual Return has been signed by appropriate person(s) and, if applicable, the revised reporting period entered
☐	Make a copy of the completed Annual Return and keep it with your licence records	
☐	Attach a cheque (unless you have paid separately) for the payment of the administrative fee for the next licence fee period	

Please send your completed Annual Return by **Registered Post** to:

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A Statement of Compliance - Licence Details

ALL licence holders must check that the licence details in Section A are correct.

If there are changes to any of these details **you must advise the EPA and apply as soon as possible for a variation to your licence or for a licence transfer.**

Licence variation and transfer application forms are available on the EPA website at: http://www.environment.nsw.gov.au/licensing, or from regional offices of the EPA, or by contacting us on telephone 02 9995 5700.

If you are applying to vary or transfer your licence you must still complete this Annual Return.

A1 Licence Holder

Licence Number	5357
Licence Holder	EDL CSM (NSW) PTY LTD
Trading Name *(if applicable)*	
ABN	66 064 847 490

A2 Premises to which Licence Applies (if applicable)

Common Name (if any)	TOWER COAL SEAM METHANE POWER STATION
Premises	DOUGLAS PARK DRIVE DOUGLAS PARK NSW 2569

A3 Activities to which Licence Applies

Electricity Generation

A4 Other Activities (if applicable)

A5 Fee-Based Activity Classifications

Note that the fee based activity classification is used to calculate the administrative fee.

Fee-based activity	Activity scale	Unit of measure
Generation of electrical power from gas	> 250.00 - 450.00	Gwh generated

A6 Assessable Pollutants (if applicable)

Note that the identification of assessable pollutants is used to calculate the **load-based fee.**
The following assessable pollutants are identified for the fee-based activity classifications in the licence:

Generation of electrical power from gas

Nitrogen Oxides (Air)
Salt (Enclosed Water)
Total suspended solids (Enclosed Water)

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B Monitoring and Complaints Summary

B1 Number of Pollution Complaints

Number of complaints recorded by the licensee during the reporting period. **If no complaints were received enter nil in the attached box, otherwise complete the table below.**	Nil

Pollution Complaint Category	Number of Complaints
Air	
Water	
Noise	
Waste	
Other	

B2 Concentration Monitoring Summary

For each monitoring point identified in your licence complete all the details for each pollutant listed in the tables provided below.

If concentration monitoring is **not** required by your licence, **no tables** will appear below.
Note that this does not exclude the need to conduct appropriate concentration monitoring of assessable pollutants as required by load-based licensing (if applicable).

Monitoring Point 8

Effluent quality monitoring, First flush sampling point labelled 'First Flush Water Monitoring Point (Grab Sample)' on drawing number 824-BA-72 titled 'Tower Site - Stack and EPA Monitoring Point Locations' submitted to EPA with letter dated 19 May 2005.

Pollutant	Unit of measure	No. of samples required by licence	No. of samples you collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Oil and Grease	milligrams per litre	Weekly during discharge	57	No visual	No visual	No visual

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pH	-		57	7.60	8.06	8.40

Monitoring Point 9

Effluent quality monitoring, Process water sampling point labelled 'Process Water Monitoring Point (Grab Sample)' on drawing number 824-BA-72 titled 'Tower Site - Stack and EPA Monitoring Point Locations' submitted to EPA with letter dated 19 May 2005.

Pollutant	Unit of measure	No. of samples required by licence	No. of samples you collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Oil and Grease	milligrams per litre	Monthly	12	<3	7.27	14
pH	-	Monthly	12	6.58	7.72	10.93

Monitoring Point 10

Ambient air and weather monitoring station, Alongside Appin Zone Substation off Brookes Point Road, Appin. Location labelled as 'EDL Ambient Air Quality Monitoring Station' on drawing number 823-AA-100 titled ' Site Plan Appin Power Station' submitted to EPA with letter dated 19 May 2005.

Pollutant	Unit of measure	No. of samples required by licence	No. of samples you collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Nitrogen Oxides	parts per billion	Continuous		Refer to Ecotech Report -		Attachment 1
Ozone	parts per billion	Continuous		Refer to Ecotech Report -		Attachment 1

Monitoring Point 11

Air emissions monitoring, NOx Analyser serving stacks 1,2,3 and 4 labelled as ' Continuous Emissions Monitoring NOx Analyser' on drawing number 824-BA-72 titled 'Tower Site- Stack and EPA Monitoring Point Locations' submitted to EPA with letter dated 19 May 2005.

Pollutant	Unit of measure	No. of samples required by licence	No. of samples you collected and analysed	Lowest sample value	Mean of sample	Highest sample value
Nitrogen Oxides	parts per million	Continuous	Continuous 99.2% capture	See attachment 2	959 g/min	

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B3 Volume or Mass Monitoring Summary

For each monitoring point identified in your licence complete the details of the volume or mass monitoring indicated in the tables provided below.

If volume or mass monitoring is not required by your licence, **no tables** will appear below.

Note that this does not exclude the need to conduct appropriate concentration monitoring of assessable pollutants as required by load-based licensing (if applicable).

Monitoring Point 7

Volume monitoring

Unit of measure	Frequency	No. of measurements made	Lowest result	Mean result	High result
kilolitres per day	Daily during any discharge	Process 188 1st flush 57	0.110 1.00	2.022 32.612	23.254 109.655

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C Statement of Compliance - Licence Conditions

C1 Compliance with Licence Conditions

(☑ the boxes)

1	Were all conditions of the licence complied with (including monitoring and reporting requirements)? (✓ a box)	☐ Yes	☑ No

2 If you answered 'No' to question 1, please supply the following details for each non-compliance in the format, or similar format, provided on the following page.

Please use a separate page for each licence condition that has not been complied with.

a) What was the specific licence condition that was not complied with?

b) What were the particulars of the non-compliance?

c) What were the date(s) when the non-compliance occurred, if applicable?

d) If relevant, what was the precise location where the non-compliance occurred?

Attach a map or diagram to the Statement to show the precise location.

e) What were the registration numbers of any vehicles or the chassis number of any mobile plant involved in the non-compliance?

f) What was the cause of the non-compliance?

g) What action has been, or will be, taken to mitigate any adverse effects of the non-compliance?

h) What action has been, or will be, taken to prevent a recurrence of the non-compliance?

3. How many pages have you attached?

Each attached page must be initialled by the person(s) who signs Section E of this Annual Return

Two

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C2 Details of Non-Compliance with Licence

Licence condition number not complied with
L3.4 Average concentration of NOx emissions exceeded 250 ppm per unit (2135g/min) for >10 minutes on 16 May 2011
Summary of particulars of the non-compliance (NO MORE THAN 50 WORDS)
10:11:30 to 10:23:36 Station NOx emission exceeded Licence limit equivalent to 250 ppm per unit (2135 g/min). Peak flow = 2982 g/min at 10:15:32. 10:11:30 = 2095 g/min. 10:23:36 = 2062 g/min. This NOx exceedance was caused by a combination of events.
If required, further details on particulars of non-compliance
Please refer to Attachment 2 of Annual Return for emissions graphing.
Date(s) when the non-compliance occurred, if applicable
16 May 2011
If relevant, precise location where the non-compliance occurred (attach a map or diagram)
Not applicable
If applicable, registration numbers of any vehicles or the chassis number of any mobile plant involved in the non-compliance
Not applicable
Cause of non-compliance
10:03 BHP drainage gas low purity. 10:03 - 10:12 - Drainage valve closed four times, station running on natural gas each time drainage valve closed. A 10 MW drop in station load. As a result the station efficiency was restricted and there was brief but sharp rise in NOx emission. The station auto unit shutdown and NOx control was triggered and drove the NOx emission down. The auto response regained control of the NOx emission but was not able to completely compensate for the initial sudden rise.
Action taken or that will be taken to mitigate any adverse effects of the non-compliance
Not applicable. Non-compliance was very short lived and no environmental harm resulted. Actual concentration above 2135 g/min occurred from 10:11:30 to 10:23:36
Action taken or that will be taken to prevent a recurrence of the non-compliance
The likelihood of re-occurrence is low. The NOx control system however will be monitored closely. The ongoing routine scheduled tuning and maintenance of individual engines will further help to control station NOx output.

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C2 Details of Non-Compliance with Licence

Licence condition number not complied with
L3.4 Average concentration of NOx emissions exceeded 250 ppm per unit (2135g/min) for >10 minutes on 30 April 2012
Summary of particulars of the non-compliance (NO MORE THAN 50 WORDS)
08:39:57 to 09:22:35 Station NOx emission exceeded Licence limit equivalent to 250ppm per unit (2135 g/min)
If required, further details on particulars of non-compliance
Please refer to attachment 2 of Annual Return for emissions graphing.
Date(s) when the non-compliance occurred, if applicable
30 April 2012
If relevant, precise location where the non-compliance occurred (attach a map or diagram)
Not applicable
If applicable, registration numbers of any vehicles or the chassis number of any mobile plant involved in the non-compliance
Not
Cause of non-compliance
00:33 - Station shutdown due to low methane purity. 05:54 - 21207 Buchholz trip, Group 2 Units 33 & 34 transformer low oil level. (This alarm would normally cause a shutdown of Group 2 units 21-40 had the station been online.) 07:01 - Restart station, only Group 1 Units 1-20 started. Group 2 units not available due to the alarm mentioned above. 07:22 - AF bias at maximum point of 199. (Limit of auto NOx control reached during Group 1 start-up). 08:16 - Group 2 restored, Units 21-40 started. A partial communication fault between Group 2 units and the station control occurred as a result of the Group 2 alarm and loss of power to Group 2 units. The communication fault was not identified at the time of starting Group 2 units. NOx control system not working due to PLC communication fault.
Action taken or that will be taken to mitigate any adverse effects of the non-compliance
Not applicable. Non-compliance was very short lived and no environmental harm resulted. Actual concentration above 2135 g/min occurred from 08:39:57 to 09:22:35
Action taken or that will be taken to prevent a recurrence of the non-compliance
The likelihood of re-occurrence is low. The NOx control system however will be monitored closely. A review of the NOx control system and PLC communications will be undertaken and improvements implemented according to the review findings.