

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.epa.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:

Annual Return

EDL CSM (NSW) PTY LTD



Generation of electrical power from gas

Nitrogen Oxides (Air)

Salt (Enclosed Water)

Total suspended solids (Enclosed Water)

B Monitoring and Complaints Summary

B1 Number of Pollution Complaints

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

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	26		No visual	

Annual Return

EDL CSM (NSW) PTY LTD



pH	-	Weekly during discharge	26	7.20	7.79	8.20
----	---	-------------------------	----	------	------	------

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	4.19	9
pH	-	Monthly	12	7.26	7.46	7.81

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	See attachment 2	1075 g/min	See attachment 2

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	First flush 26	1	33.3	107
		Process 260	0.23	1.782	11

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)? Yes No

(✓ a box)

-
- 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

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 18 March 2013
Summary of particulars of the non-compliance (NO MORE THAN 50 WORDS)
15:14:14 to 15:16:19 station NOx emission exceeded Licence limit equivalent to 250 ppm 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
18 March 2013
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
Caused by a combination of events: 15:04-15:12 Multiple exhauster trips, natural gas valve opening each time to compensate for the decrease in drainage gas flow. 15:08 A 7MW drop in station load after exhauster trip. 15:09 A 6.3MW drop in station load after exhauster trip. 15:10 A 5.5 MW drop in station load after exhauster trip. As a result the station efficiency was restricted and there was brief but sharp rise in NOx emissions.
Action taken or that will be taken to mitigate any adverse effects of the non-compliance
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. The event was short lived and did not cause environmental harm.
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.

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 18 March 2013.
Summary of particulars of the non-compliance (NO MORE THAN 50 WORDS)
11:08:11 to 11:10:21 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
19 March 2013.
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
Caused by a combination of events: 10:58 Exhauster trips, drainage gas flow decreasing from 17200 to 2770 m3/h. 10:58 Natural gas valve opened, flow increasing from 0 to 9700 m3/h. 10:58-11:03 A 15MW drop in station load. 11:05-11:10 A 9.9MW drop in station load. As a result, the station efficiency was restricted and there was brief but sharp rise in NOx emissions.
Action taken or that will be taken to mitigate any adverse effects of the non-compliance
The station auto unit shutdown and NOx control was triggered and drove the NO emission down. The auto response regained control of the NOx emission but was not able to completely compensate for the initial sudden rise. The event was short lived and did not cause environmental harm.
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.