



ENVIRONMENT PROTECTION ACT 1970
SECTION 31D(5)

ANNUAL PERFORMANCE STATEMENT

ENERGYAUSTRALIA YALLOURN PTY LTD

HOLDER OF LICENCE: 10961
ACN: 065 325 224
REGISTERED ADDRESS: LEVEL 33 385 BOURKE ST
MELBOURNE VIC 3000
PREMISES ADDRESS: EASTERN RD
YALLOURN VIC 3825

STATEMENT SUMMARY

Statement Period: 01-Jul-2019 To 30-Jun-2020

Total Number of Conditions on Licence: 22
Number of Conditions - Complied: 21
Number of Conditions - Non-Complied: 1

DECLARATION

I, Catherine Tanna declare that the information in this Annual Performance Statement is true and correct. I have made all necessary enquiries, and no matters of significance have been withheld from the EPA

Name: Catherine Tanna Position: Managing Director

Signed:  Date: 30 November 2020

The most senior Australian-based officer of your organisation for this licence must sign this statement and it must be scanned and uploaded along with this completed APS form via the EPA web portal by 30 November 2020.

In the event this is not possible, the signed statement must be faxed to (03) 8677 9063 by 30 November 2020. In both instances the statement must also be e-certified on the web portal by 30 November 2020.

1. Under Section 31D(5) of the Environment Protection Act 1970, it is an offence to provide false or misleading information in an Annual Performance Statement or conceal any relevant information or document from the Authority. Contravention of subsection (5) is an indictable offence that carries a penalty of 2400 penalty units or imprisonment for two years, or both.

STATEMENT OF COMPLIANCE

Premises Address: EASTERN RD, YALLOURN VIC 3825

Licensed Activities: This licence applies to a premises, where brown coal is mined and electricity is generated in a brown coal fired power station, and allows for discharges to air and surface waters, and landfills for ash, asbestos, synthetic mineral fibre and solid inert wastes. The premises includes twin ash ponds, from which saline wastewater is discharged to the Integrated Ashing Effluent System.

Scheduled Categories:

A05	Landfills
C01	Extractive Industry and Mining
K01	Power Stations
A01	Prescribed Industrial Waste Management

Analysis of performance against environmental Performance Conditions

Condition Area	Condition Reference	Condition Description	Condition Complied with?
General	LI_G1	You must ensure that waste is not discharged, emitted or deposited beyond the boundaries of the premises except in accordance with this licence or under the Act.	Yes
General	LI_G2	You must immediately notify EPA of non-compliance with any condition of this licence by calling 1300 EPA VIC (1300 372 842), sending an email to contact@epa.vic.gov.au , or using the EPA Interaction Portal.	Yes
General	LI_G3	By 30 September each year you must submit an annual performance statement to EPA for the previous financial year in accordance with the Annual Performance Statement Guidelines (EPA Publication 1320.3, released June 2011).	Yes
General	LI_G4	Documents and monitoring records used for preparation of the annual performance statement must be retained at the premises for five years from the date of each statement, and be able to be immediately produced upon request by an officer of the Authority.	Yes
General	LI_G5	You must establish and implement a risk based monitoring program that enables you and EPA to determine compliance with each condition of this licence. The monitoring program must comply with the requirements of the monitoring guidelines (EPA document 1321.2, released June 2011).	Yes
General	LI_G5.2	You must implement a program to assess the effect of your discharges to air on the ability of the Latrobe Valley Air Quality Control Region to comply with Schedule 2 of the State environment protection policy (Ambient Air Quality).	Yes
General	LI_G6	You must provide EPA with a financial assurance determined by the EPA, and maintain such assurance (including any part of such assurance) so that it can be claimed on, utilised or realised as and when required.	Yes

Condition Area	Condition Reference	Condition Description	Condition Complied with?
Amenity	LI_A1	You must ensure that odours offensive to the senses of human beings are not discharged, emitted or released beyond the boundaries of the premises.	Yes
Amenity	LI_A2	You must ensure that there are no emissions of noise and/or vibrations from the premises which are detrimental to either of the following: a) the environment in the area around the premises; and b) the wellbeing of persons and/or their property in the area around the premises.	Yes
Amenity	LI_A3	You must ensure that nuisance dust and/or nuisance airborne particles are not discharged or emitted beyond the boundaries of the premises, except as permitted by this licence.	Yes
Landfill	LI_L1	You must develop and put into place a monitoring program that accords with Section A of the Landfill Licensing Guidelines, (EPA Publication 1323.3, released September 2016). The program must evaluate the risks to the environment associated with the operation of the landfill and the steps which can be taken to manage such risks and enable both you and EPA to determine changes in the condition of the environment or impacts to environmental quality as a result of activities at the premises. The monitoring program must be verified by a person who has been appointed as an environmental auditor under the Environment Protection Act 1970 and it must do all of the following: a) contain an assessment of the risks to the environment arising from the waste that has been deposited at the premises and of the current landfill operation prepared in accordance with the Landfill Licensing Guidelines, (EPA Publication 1323.3, released September 2016) or another method approved by EPA in writing; b) describe the environmental monitoring of landfill gas, leachate, groundwater, land, air, odour, noise, dust and surface water which will be undertaken to respond to the risks identified in the risk assessment in paragraph a) above; c) contain trigger levels and contingency actions to prevent further pollution when exceeded; d) specify the frequency for completing environmental audits of the landfill operation; and e) be appropriate and adapted to the characteristics of the landfill, including the landfill design, the volume of waste received, the age and planned future lifespan of the landfill and the surrounding environment.	Yes

Condition Area	Condition Reference	Condition Description	Condition Complied with?
Landfill	LI_L2	You must engage a person who has been appointed as an environmental auditor under the Environment Protection Act 1970 to conduct and submit to EPA environmental audits of the risk of harm actually or potentially arising from landfill operation under Section 53V of the Act at the frequency specified in the monitoring program.	Yes
Landfill	LI_L3.2.1	By the end of each day's operations, any asbestos or synthetic mineral fibre deposited to the landfill must be covered (a) with a layer of soil at least 0.30 metres thick, or (b) using another method of cover approved by EPA.	Yes
Landfill	LI_L4	Waters contaminated by leachate must not be discharged beyond the boundaries of the premises.	Yes
Air	LI_DA1	Discharge of waste to air must be in accordance with the 'Discharge to Air' Table.	Yes
Air	LI_DA1.3.1	The concentration of particles from discharge points A1, A2a and A2b must not exceed 0.22 grams per normal cubic metre (based on 30 minute averages at 12% CO ₂) for more than a total of 1200 hours per year (aggregate total for all discharge points).	Yes
Air	LI_DA2	Visible emissions to air other than steam must not be discharged from the premises, except as permitted by this licence.	Yes
Water	LI_DW1	You must ensure that surface water discharged from the premises is not contaminated with waste.	Yes
Water	LI_DW2	Discharge of waste to surface waters must be in accordance with the 'Discharge to Water' Table.	Yes
Water	LI_DW2.09	Maximum discharge allowed from the premises is 150 ML/Day.	Yes
Land	LI_DL1.3	You must ensure that the activities carried on at the premises do not do either of the following: a) cause detriment to any beneficial use which may be made of groundwater both within and beyond the boundary of the premises. b) pollute groundwater both within and beyond the boundary of the premises contrary to section 39 of the Environment Protection Act 1970.	No
Land	LI_DL3.3	Deposit of wastes generated at the premises must be in accordance with Schedule 2 except for leached ash which may be transported from the premises to a facility licensed to accept such waste.	Yes

NON-COMPLIANCE DETAIL

Premises Address: EASTERN RD, YALLOURN VIC 3825

DETAILS OF NON COMPLIANCE WITH LICENCE CONDITION

Condition: LI_DL1.3 You must ensure that the activities carried on at the premises do not do either of the following:

- a) cause detriment to any beneficial use which may be made of groundwater both within and beyond the boundary of the premises.
- b) pollute groundwater both within and beyond the boundary of the premises contrary to section 39 of the Environment Protection Act 1970.

a) Date(s) when the non-compliance occurred (if applicable)

06/02/2020

b) Summary of particulars of non-compliance

Per and Poly-Fluorinated Alkyl substances (PFAS) detected in some groundwater within premises. A Clean Up Notice (CUN 90010655) was issued by EPA on 6 February 2020 to prepare and submit an auditor verified plan to remediate the old fire training ground by 28 June 2020. The CUN Notice (CUN 90010655) was subsequently revoked by EPA on 15 July 2020.

c) What is your assessment of environmental impact as a result of non-compliance

Contamination of some groundwater on site and potential for ecological impact to wastewater discharges to receiving river

d) Cause of non-compliance

Cause linked to the use of firefighting foams on site at the old fire training ground.

e) Action taken or that will be taken to mitigate any adverse effects of the non-compliance

The remediation strategy involves the following:

- (i) Preparation of a detailed plan for capping and drainage,
- (ii) Preparation of the site to facilitate capping,
- (iii) Contracting for the remediation works and implementing the design (to be undertaken following the completion of design and preparation works).
- (iv) Increased frequency of monitoring of groundwater, drains, site discharges and receiving rivers to verify the effectiveness of the implemented controls.
- (v) A future risk assessment of ecological impact on receiving river waters from the site wastewater discharge.

f) Action taken or that will be taken to prevent reoccurrence of the non-compliance

The fire training area was closed in November 2017. Improved drainage to be installed to divert surface water run off away from the fire training area. A cap placed on the area to restrict groundwater impact from surface water infiltration.

AIR ADDITIONAL INFORMATION

Premises Address: EASTERN RD, YALLOURN VIC 3825

AIR - MONITORING METHODS

Indicator	Monitoring Method	Number of Samples							Total	% Downtime	NATA Accredited
		Q1 (Jul-Sep)	Q2 (Oct-Dec)	Q3 (Jan-Mar)	Q4 (Apr-Jun)	Q1	Q2	Q3			
Carbon monoxide	Stack test	0	1,008	576	432	2,016				YES	
Chlorine compounds (as Chlorine)	Stack test	0	6	2	4	12				YES	
Fluorine compounds (as HF)	Stack test	0	6	4	2	12				YES	
Oxides of nitrogen (as NO2)	Stack test	0	1,008	576	432	2,016				YES	
Particles	Continuous								0.00	N/A	
Sulfur dioxide	Stack test	0	1,008	576	432	2,016				YES	
Sulfur trioxide	Stack test	0	6	2	4	12				YES	

AIR - RECORDED VALUES

Discharge Point Number	Indicator	Units	Licence Limit	Maximum Recorded Value	90th Percentile Value	Primary Proxy Indicator	Secondary Proxy Indicator
*A1,A2a, A2b	Carbon monoxide	g/min	139,000	= 45,454.000	32,026.000		
*A1,A2a, A2b	Chlorine compounds (as Chlorine)	g/min	22,000	= 14,606.000	13,253.000		
*A1,A2a, A2b	Fluorine compounds (as HF)	g/min	5,600	= 107.000	95.000		

Discharge Point Number	Indicator	Units	Licence Limit	Maximum Recorded Value	90th Percentile Value	Primary Proxy Indicator	Secondary Proxy Indicator
*A1,A2a, A2b	Oxides of nitrogen (as NO2)	g/min	51,600	= 36,672.000	33,712.000		
*A1,A2a, A2b	Particles	g/min	24,100	= 17,736.000	10,386.000		
*A1,A2a, A2b	Sulfur dioxide	g/min	104,000	= 68,101.000	62,935.000		
*A1,A2a, A2b	Sulfur trioxide	g/min	10,900	= 2,577.000	2,294.000		

* Indicates a bubble limit

WATER ADDITIONAL INFORMATION

Premises Address: EASTERN RD, YALLOURN VIC 3825

WATER - RECORDED VALUES

Discharge Point Number	Indicator	Recorded Value Required?	Collected?	Units	Limit Type	Licence Limit	Recorded Value
W1	Suspended solids	Required	Yes	mg/l	Annual Median	20	= 13.000
W1	Turbidity	Required	Yes	NTU	Maximum	60	= 46.000
W1	Total dissolved solids	Required	Yes	mg/l	Maximum	700	= 470.000
W1	Total dissolved solids	Required	Yes	mg/l	Annual Median	450	= 410.000
W1	Suspended solids	Required	Yes	mg/l	Maximum	50	= 35.000
W1	Turbidity	Required	Yes	NTU	Annual Median	25	= 16.000
W1	Colour	Required	Yes	Pt-Co	Maximum	70	= 65.000
W1	Colour	Required	Yes	Pt-Co	Annual Median	50	= 35.000
W1	pH	Required	Yes	pH	Maximum	8.5	= 7.400
W1	pH	Required	Yes	pH	Minimum	6	= 6.900
W1	Suspended solids	Optional	No	mg/l	90th Percentile		=
W1	Turbidity	Optional	No	NTU	90th Percentile		=
W1	Total dissolved solids	Optional	No	mg/l	90th Percentile		=
W1	Total dissolved solids	Optional	No	mg/l	90th Percentile		=
W1	Suspended solids	Optional	No	mg/l	90th Percentile		=
W1	Turbidity	Optional	No	NTU	90th Percentile		=
W1	Colour	Optional	No	Pt-Co	90th Percentile		=
W1	Colour	Optional	No	Pt-Co	90th Percentile		=
W1	pH	Optional	Yes	pH	Annual Median		= 7.100

Discharge Point Number	Indicator	Recorded Value	Collected?	Units	Limit Type	Licence Limit	Recorded Value
W1	pH	Optional	No	pH	Annual Median	=	

WATER - SAMPLING RECORD AND FLOW

Number of Samples

Q1 (Jul - Sep)	Q2 (Oct - Dec)	Q3 (Jan - Mar)	Q4 (Apr - Jun)	Total
14	13	13	13	53

Discharge (ML)

Q1 (Jul - Sep)	Q2 (Oct - Dec)	Q3 (Jan - Mar)	Q4 (Apr - Jun)	Total
4,859.02000	4,761.85000	4,193.80000	3,418.15000	17,232.82000

LANDFILL ADDITIONAL INFORMATION

Premises Address: EASTERN RD, YALLOURN VIC 3825

MONITORING PROGRAM VERIFICATION

Has your monitoring program been verified by an environmental auditor in the past Financial Year? Yes No

Last date Monitoring Program verified: 27/10/2017

Environmental Auditor: Jonathan Medd

Did the environmental auditor set any requirements for your monitoring program? Yes No

Audit frequency (set by auditor) every year(s)

Next scheduled audit completion date:

This is the date of your next audit and it must be within the audit frequency period set by the environmental auditor.

AUDIT REQUIREMENTS

Has your environmental audit been completed in the past Financial Year? Yes No

Last audit report date: 27/10/2017

Environmental Auditor: Jonathan Medd

Audit report CARMS number: 71329-3

Did the environmental auditor set any recommendations? Yes No

AUDITOR REQUIREMENTS / RECOMMENDATIONS

Financial Year Created	Audit Report CARMS Number	Recommendation ID	Recommendation Type	Priority	Estimated Completion Date	Status of Completion	Date Completed
2015/16	71329-1	C1	Monitoring Program	Low	31/12/2032	In Progress	
<p>Recommendation Rehabilitation and capping of the landfill should be implemented in the future to ensure that the long term risk of harm or detriment to beneficial use of land remains low. Rehabilitation and capping should be in accordance with requirements of the Best Practice Environmental Management, Siting, Design, Operation and Rehabilitation of Landfills (BPEM) (EPA, 2010), or as otherwise agreed with EPA.</p> <p>Action Taken / Proposed Landfill final rehabilitation and design will be in accordance with Best Practice Environmental Management, Siting, Design, Operation and Rehabilitation of Landfills (EPA, 2010), or as agreed with by EPA.</p>							
2017/18	71329-3	G6	Monitoring Program	Low	01/01/2020	Completed	01/09/2020
<p>Recommendation Address recommendations outlined in the Hydrogeological Assessment (HA) and update the report, when appropriate.</p> <p>Action Taken / Proposed Hydrogeological Assessment recommendations have been implemented and the HA report updated as appropriate.</p>							
2017/18	71329-3	LFG1	Monitoring Program	Low	01/01/2020	Completed	01/07/2020
<p>Recommendation Waste landfill monitoring bores to be monitored biannually to track landfill gas generation for another four events. Surface emissions monitoring of the Hard Waste landfill should continue to be carried out to demonstrate compliance to BPEM, at least once every two years.</p> <p>Action Taken / Proposed EA Yallourn's emissions monitoring program has been revised to reflect the Audit recommendation. EA Yallourn's landfill gas biannual monitoring has been completed as per the recommendations of Audit. Ongoing LFG monitoring to continue.</p>							
2017/18	71329-3	LFG2	Monitoring Program	Medium	01/01/2019	Completed	25/03/2020
<p>Recommendation Install at least two bores or use existing bores, if suitable, to ascertain potential landfill gas in the former hard waste landfill.</p>							

Financial Year Created	Audit Report CARMS Number	Recommendation ID	Recommendation Type	Priority	Estimated Completion Date	Status of Completion	Date Completed
<p>Action Taken / Proposed</p> <p>Initial recommendation addressed in 53V 17/09/2015 stated 'Ash landfill – if the historic waste cannot be adequately documented or validated as a minimum surface emissions surveys and head space monitoring of wells installed in the vicinity of the landfill should be monitored under falling pressure conditions. Based on the results further work may be required'.</p> <p>Further investigation of suitable bores in the vicinity of the former hard was landfill was undertaken. Lithology of bore logs found 'glass, rubble, steel, brick rubble'. Satisfied waste type has been confirmed. This suggest that waste is unlikely to generate levels of LFG. EA proceeded with the installation of two LFG bores in the Former Hard Waste Landfill and have been tested for potential LFG.</p>							
2017/18	71329-3	General	Site Audit	High	27/10/2020	Completed	27/10/2020
<p>Recommendation</p> <p>Undertake Landfills Section 53V audit every three years.</p>							
<p>Action Taken / Proposed</p> <p>Audit to be scheduled to be completed within the required three year period.</p>							
2017/18	71329-3	LFG	Monitoring Program	Medium	31/12/2032	Not started	
<p>Recommendation</p> <p>Following intermediate or final capping of the Hard Waste landfill gas bore and surface emissions should initially be monitored on a six-monthly basis for four events, or as agreed with an Environmental Auditor, with further monitoring to be assessed based on the results.</p>							
<p>Action Taken / Proposed</p> <p>Will be undertaken following capping of the Hard Waste landfill.</p>							