



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:	L8841/2014/1	Licence file number:	2013/002960-1
Licence holder name:	CSBP Limited		
Trading as:	CSBP Limited (Premises: Geraldton Fertiliser Distribution Facility)		
ACN:	008 668 371		
Registered business address:	Level 14, 123 St Georges Terrace PERTH WA 6000		
Reporting period:	01/04/21	to	31/03/22

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)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• 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
33	

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
33	Infiltration to L1 (Pond 1 overflow) = 1,999 m ³

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:	1.2.3	Date(s) of non-compliance:	22 July 2021
Details of non-compliance:			
<p>Project overview and context</p> <p>A project was commissioned over summer 2020/21 at the CSBP Geraldton site to replace the existing corroded plant with new despatch equipment inside the eastern end of the No.3 Super shed adjacent to the weighbridges. The objective of this project was to complete corrosion repair activities, in so doing improving team member safety as well as plant productivity and reliability.</p> <p>As part of the project scope, the door in the corner of the No. 3 Super shed was planned as access to the new despatch plant for cleaning and maintenance purposes, with the apron in front of the doorway sloped away from the door to direct stormwater to a drainage pit. The stormwater drainage pit is located between the No.3 Super shed and the site office (Figure 1), and receives stormwater runoff from the storage shed roof and from a bitumen catchment area. Stormwater that enters this pit is directed to Pond 1 (concrete lined dam) via underground piping.</p> <p>Pond 1 receives the majority of stormwater runoff from site, and from this location stormwater can be re-directed to Pond 2 (HDPE lined evaporation dam). Stormwater can overflow to an infiltration area north of Pond 1 if all storage has been exhausted in accordance with condition 2.1 of licence L8841/2014/1.</p> <p>Geraldton licence condition 1.2.3 states that “The Licensee shall implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises”. As part of the HAZOP/design review process conducted prior to the beginning of project construction, a risk control in the form of a speed bump style bund was identified to prevent the loss of solid product from under the storage shed doorway.</p> <p>Construction</p> <p>The new plant was installed in early 2021. The bunding identified in the design review process was not implemented prior to the plant commencing operation due to project delays and labour shortages during construction. The proposed change to the plant set up during construction did not trigger a review of the risk assessment. No substitute control was implemented.</p> <p>Operation</p> <p>During operation, urea product has fallen from the conveyor system and built up in the storage shed. Urea has changed from a solid to a liquid state due to interaction with moisture in the air. A site inspection on 22 July 2021 identified this solution of fertiliser product leaking under the storage shed door, and a lime sand bund was put in place to absorb liquified product.</p> <p>CSBP considers that in this instance, all practical measures were not undertaken to prevent activities on the premises contaminating stormwater, the primary control planned as part of the project to prevent product escape from the storage shed was not implemented due to an inability to access the labour resources required to deploy the control. Product escaped from the shed, resulting in stormwater contamination.</p>			

Section E – Details of non-compliance with licence condition	
<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>Due to higher than average stormwater volumes captured in 2021, in addition to stormwater accrued from previous years, Pond 1 overflowed to the infiltration area after this incident was identified, with overflow events occurring in July, August and October 2021. Please see figure 1 attached for a map of the incident area, including locations of interest.</p> <p>The overflow events for July 2021 resulted in a discharge of approximately 1,464 m³ of stormwater to the infiltration area with an estimated load of 535 kg total nitrogen, and 12 kg total phosphorus.</p> <p>The August overflow event resulted in a discharge of approximately 92 m³ of stormwater with an estimated load of 19 kg of total nitrogen and 0.69 kg of total phosphorus.</p> <p>The October overflow event resulted in a discharge of approximately 443 m³ of stormwater with an estimated load of 28 kg of total nitrogen and 2.6 kg of total phosphorus.</p> <p>Consistent with licence conditions, overflows are permitted in the event that all stormwater storage capacity is exhausted, sampling of Pond 1 is conducted within 48 hours of a discharge, and the DWER is notified of the event as soon as practicable but no later than 5pm of the next usual working day.</p> <p>All licence conditions were complied with in regards to overflow events.</p>	
Cause (or suspected cause) of non-compliance:	
<p>Root Cause</p> <ul style="list-style-type: none"> • A delay to planned project controls (owing to resource availability challenges), and the buildup of product interacting with moisture in the air formed a nitrogen rich liquid that seeped under the storage shed door and into the stormwater drain. Subsequently, stormwater nutrient analysis indicated an increase in nitrogen concentrations. <p>Contributing factors</p> <ul style="list-style-type: none"> • Increased rainfall has reduced the effectiveness of road sweeping as a key containment control. 	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ol style="list-style-type: none"> 1. Installation of the bund and sump to contain product build up during product despatching operations (as planned as part of the project but deferred due to resource availability). 2. Develop a plant pre-start check process to identify product spillage and therefore pre-emptive containment actions. <p>Both of these corrective actions were completed.</p>	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> 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 particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website, **with the exception of the production quantity. CSBP does not consent to production (despatch) tonnes being published as this information may be used by our competitors to assess markets in the region.**

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Director CSBP Limited	Position:	Director CSBP Limited
Date:	25 May 2022	Date:	24 May 2022
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.

Environmental Incident Investigation Report

Location: CSBP Fertilisers – Geraldton

CSBP Incident Number: INC-84682

Date of investigation: 23 July 2021

Department: CSBP Fertilisers – Geraldton

Figure 1: Stormwater drainage map – CSBP Geraldton

