



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:	L5533/1976/11	Licence file number:	2011/005902
Licence holder name:	[REDACTED]		
Trading as:	[REDACTED]		
ACN:	[REDACTED]		
Registered business address:	[REDACTED]		
Reporting period:	01/01/2021 to 31 /12 /2021		

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)

- 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
Category 5 Processing or beneficiation of metallic or non- metallic ore	Total Ore Treated/Milled - zero dry metric 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
Category 5 Processing or beneficiation of metallic or non-metallic ore	Tailings to TSF – zero tonnes

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:	3	Date(s) of non-compliance:	16 August 2021
Details of non-compliance:			
<p>Three Dryer stack units recorded the following (averaged) particulate concentrations during their monthly (i.e. non statutory) sampling run conducted on 16 August 2021:</p> <ul style="list-style-type: none"> • Dryer 1: 140 mg/m³ • Dryer 2: 360 mg/m³; and • Dryer 3: 130 mg/m³. <p>Licence L5533/1976/11 (L5533) sets the discharge limit for particulates at 250mg/m³. Dryer 2 exceeded this limit.</p>			
<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>There was no actual or suspected environmental impact as a result of this exceedance, as determined by the application of the CALMET/CALPUF model for the period 15 June 2021 to 31 August 2021.</p> <p>Modelled ground level concentrations were below National Environment Protection Measures (NEPM) at identified receptors.</p> <p>A map showing the location of the dryers is attached below as Figure 1.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of the exceedance was investigated and determined to be that the conversion of Scrubber No. 2 did not align with the validated design (i.e. represented in Scrubber No. 1 and 3 conversions).</p> <p>Further contributing factors were:</p> <ul style="list-style-type: none"> • No drawing or QAQC check sheet was referenced during the conversion of Scrubber No. 2. • Incorrect installation of newly designed impingement plates within Scrubber No. 2. • Water and gas pathways were not correctly interlinked within Scrubber No. 2, plus internals were missing fabricated weir extensions and baffles that ensure effective scrubbing of exhaust gases. 			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>BHP NiW took the following action to mitigate adverse effects and prevent recurrence:</p> <ul style="list-style-type: none"> • Scrubber No. 2 opened up for inspection and cleaning, prior to notification of exceedance, maintenance was triggered by an increase in the exhaust fan amps trend. • Upon notification of exceedance site immediately de-rated Scrubber No. 2 capacity by dropping the dryer operating temperature level and therefore throughput. • Scrubber No. 2 then reconfigured as per validated design. • Reviewed configuration of Scrubber No. 2 to ensure that refurbishment work was executed as per validated design (as represented in Scrubber No. 1 and 3). • Developed a 'handbook' detailing revised and validated design for the concentrator scrubber units. • Finalised a process to review updated scrubber configurations. • Re-tested refurbished Scrubber No. 2 unit on 30 August 2021 which yielded a compliant particulate result of 160 mg/m3. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 24/08/2021



Government of Western Australia
Department of Water and Environmental Regulation

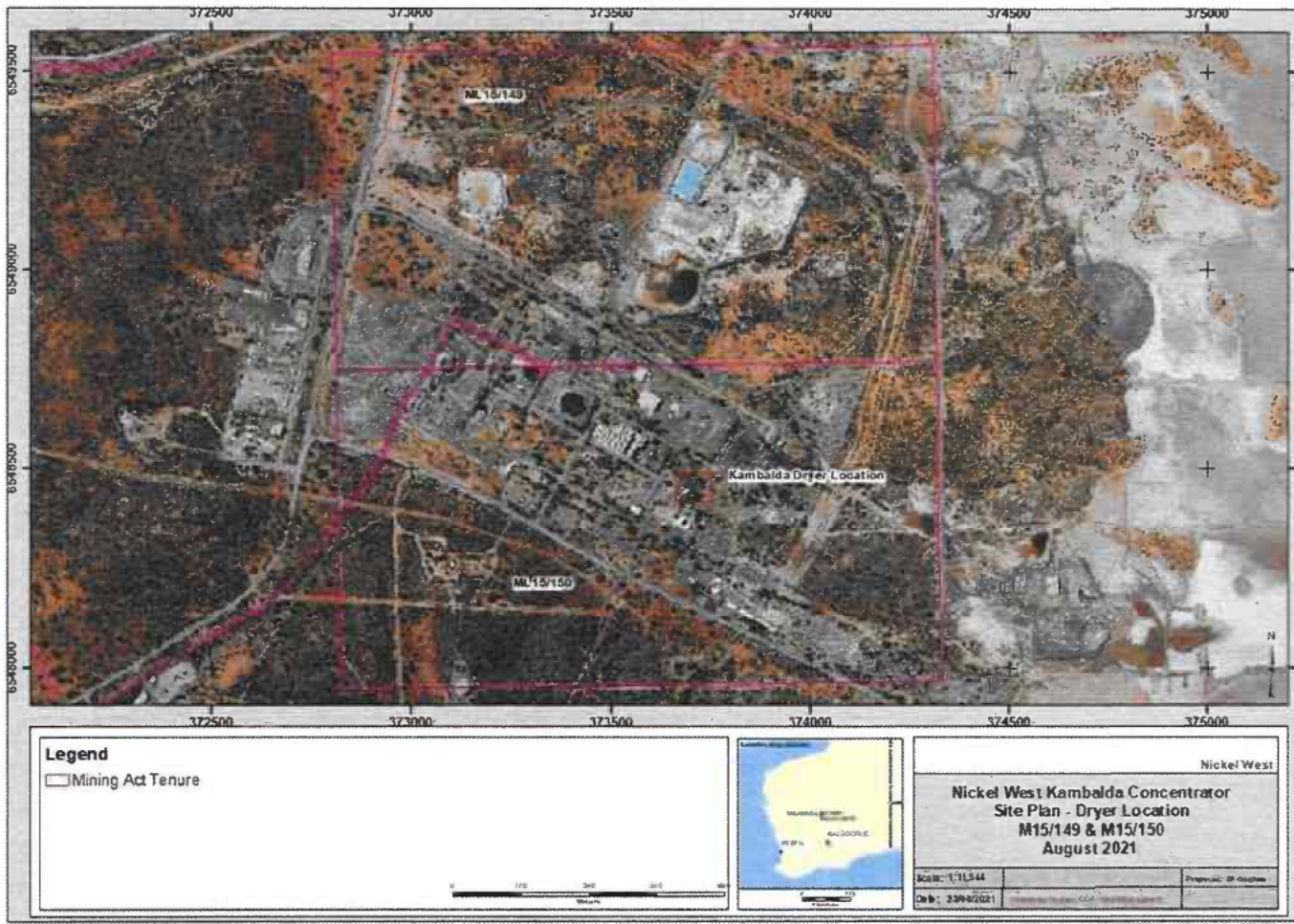


Figure 1: Nickel West Kambalda Concentrator – Dryer Locations



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.

Signature ² :	[Redacted]	Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		24/02/2022	Date:
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.