



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:	BHP Nickel West Pty. Ltd.		
Trading as:	Click here to enter text		
ACN:	004184598		
Registered business address:	125 St Georges Terrace PERTH 6000		
Reporting period:	01/01/2022 to 31 /12 /2022		

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 – 151,239 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 – 138,675 dry metric 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:	1 February 2022
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 1 February 2022:</p> <ul style="list-style-type: none"> • Dryer 1: 350 mg/m³ • Dryer 2: 240 mg/m³; and • Dryer 3: 250 mg/m³. 			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>No environmental impact as a result of the non-compliance, as determined by the application of the CALMET/CALPUF model for the period 23 November 2021 to 10 February 2022.</p> <p>Modelled ground level concentrations were below National Environment Protection Measures (NEPM) at identified receptors.</p>			
Cause (or suspected cause) of non-compliance:			
<ul style="list-style-type: none"> • Equipment upgrades were based on drawings that were incorrect • The commissioning plan for process modification didn't account for a negative impact on system efficiency which resulted in an increase in emitted particulate matter concentrations • Modifications were completed that unexpectedly reduced system efficiency, resulting in increased particulate matter emissions with no containment plan in place 			

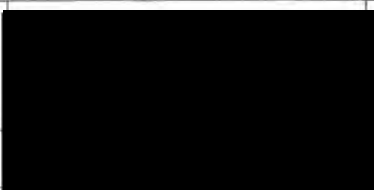
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> Put in place a temperature cap on Dryer 1 set at 450oC, until system modifications are complete and the process can achieve <250mg/m3. Complete next phase of emission improvement program (i.e. stack cleaning on dryers and water flow upgrade). Put in place requirement for a commissioning plan (including stack emission testing prior to returning to normal operation) that ensures compliance to Condition 3 of license (<250mg/m3). Distribute communication to key program stakeholders on the requirement for properly utilising the BHP Management of Change process. 	
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: 8/02/2022

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:	14 August 2022
Details of non-compliance:			
Three Dryer stack units recorded the following (averaged) particulate concentrations during their monthly (i.e. non statutory) sampling run conducted on 14 August 2022:			
<ul style="list-style-type: none"> Dryer 1: 340 mg/m3 Dryer 2: 190 mg/m3; and Dryer 3: 210 mg/m3. 			
What was the actual (or suspected) environmental impact of the non-compliance?			
NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No environmental impact as a result of the non-compliance, as determined by the application of the CALMET/CALPUF model for the period 1 June 2022 to 31 August 2022.			
Modelled ground level concentrations were below National Environment Protection Measures (NEPM) at identified receptors.			
Cause (or suspected cause) of non-compliance:			
The formal investigation did not identify any one major factor that lead to the emission exceedance by Dryer 1.			

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Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • Continue to monitor operational parameters to ensure optimal production whilst maintaining operational licence limits. • Assess feed parameters and ensure operational parameters are adjusted alongside plant feed. • Continue to undertake quarterly stack testing to ensure compliance to operational licence. • Ensure scrubber cleaning continues to be undertaken on a regular basis. 	
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: 4/10/2022

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 particular ¹ .	
I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.	
Signature ² :	 Signature:
Name: (printed)	Name: (printed)
Position:	General Manager Kambalda Nickel West Position:
Date:	15/3/2022 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