Government of **Western Australia**
Department of **Water and Environmental Regulation**

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details			
Licence number:	L9223/2019/1	Licence file number:	DER2019/000564
Licence holder:	Yara Pilbara Nitrates Pty Ltd		
Trading as:			
ACN:	127 391 442		
Registered address:	Level 5, 182 St Georges Terrace PERTH WA 6000		
Reporting period:	01 / 01 / 2023 **to** 31 /12 / 2023		

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**
31: chemical manufacturing	184,778 T Technical Ammonia Nitrate

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**
NA	NA

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:	24/01/2023, 19:00
Details of non-compliance:			
Emissions from the Unit 12 (U12) Nitric Acid Plant (NAP) Stack (A2) exceeded the licence limit: • 24th January 2023 o NH_3 - 0.86 mg/m³ at 7pm			
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. Ammonia spikes were for short durations (18:20 to 18:32 and 18:38 to 18:52). The spike did not result in any elevated NH_3 levels across the sites' real time boundary gas detectors.			
Cause (or suspected cause) of non-compliance:			
At 18:06 YPN experienced a significant swing in the nitric acid reactor temperature due to the malfunction of the ammonia header pressure control valve 12-PV-006A. This swing caused the NO_x emissions to increase drastically leading to $DeNO_x$ controller adding ammonia to abate the emissions. As the NO_x peak reduced and the header swing stabilised the added ammonia had less NO_x to react with and thus slipped through the $DeNO_x$ unit leading to an increase of ammonia emissions.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
• Operator addressed the root cause of the reactor swing to prevent recurrence • Operator training undertaken to highlight importance of managing ammonia slip during upset conditions			
Was this non-compliance previously reported to DWER?			
☐ No			
☒ Yes, and			
☐ Reported to DWER verbally		Date: / /	
☒ Reported to DWER in writing		Date: 31/01/2023	

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:	26/07/2023, 21:00
Details of non-compliance:			
Emissions from the Unit 12 (U12) Nitric Acid Plant (NAP) Stack (A2) exceeded the licence limit: • 26th July 2023 o NH_3 - 1.65 mg/m³ at 9pm			
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. Ammonia spike was for short duration, approximately 40 minutes. The spike did not result in any elevated NH_3 levels across the sites real time boundary gas detectors.			
Cause (or suspected cause) of non-compliance:			
On the 26th July 2023 at approximately 20:03, $DeNO_x$ outlet NOx analyser, 12-AIC-005, underwent calibration. During the calibration process, the ammonia flow controller, 12-FIC-035, switched from CAS mode to Auto as per the logic programmed. Unfortunately, the operator changed the mode back to CAS inadvertently, not realizing that the calibration was still ongoing. This led to 12-FIC-035 taking a higher setpoint for ammonia flow into the DeNOx reactor, resulting in an exceedance of the ammonia license limit.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
• Operator training explaining procedure and troubleshooting guideline for monitoring of YPN licence limits			
Was this non-compliance previously reported to DWER?			
☐ No			
☒ Yes, and			
☐ Reported to DWER verbally		Date: / /	
☒ Reported to DWER in writing		Date: 01/08/2023	

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]:	[redacted]	Signature:	
Name: (printed)		Name: (printed)	
Position:	Environment & Sustainability Manager	Position:	
Date:	28/03/2023	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.