



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:	L9224/2019/1	Licence file number:	DER2019/000563
Licence holder:	Yara Pilbara Fertilisers Pty Ltd		
Trading as:			
ACN:	095 441 151		
Registered address:	Level 5, 182 St Georges Terrace PERTH WA 6000		
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)
<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 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	748,627 T Ammonia
85: sewage facility	3,363 m ³

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

Section D – Statement of 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:	6	Date(s) of non-compliance:	01/01/21-31/12/21 Ongoing
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Details of non-compliance:

Following installation of the CEMS unit on the Primary Reformer stack it was identified that the NO_x (as NO₂) emissions are exceeding the Licence limit of 180 mg/m³ NO_x (as NO₂) once every 26-32 hours, for approximately 90 mins per event.

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.

Given the duration of the NO_x exceedances no immediate environmental impact is expected from this limit exceedance.

Cause (or suspected cause) of non-compliance:

Analysis has shown that these high NO_x readings are correlating with a recurring production process step (mol sieve regeneration) that was not otherwise observable without CEMS installed.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

DWER was notified of this recurring exceedance on the 8th of September 2020 and regular updates (monthly) on the status of this issue and the actions that have been and will be taken.

Was this non-compliance previously reported to DWER?

☐ No

☒ Yes, and

☐ Reported to DWER verbally

Date: / /

☒ Reported to DWER in writing

Date: 8/09/2020

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:	6	Date(s) of non-compliance:	24/02/2021 24/03/2021 08/04/2021 12/04/2021 13/04/2021 19/04/2021
Details of non-compliance:			
<p>Primary Reformer stack exceeded Licence limit of 180 mg/m³ of NO_x (as NO₂).</p> <ul style="list-style-type: none"> • 24/02/2021 14:00-19:00 6 hours • 24/03/2021 15:00-16:00 2 hours • 08/04/2021 18:00-20:00 3 hours • 12/04/2021 08:00-14:00 7 hours • 13/04/2021 01:00-13:00 & 15:00-16:00 15 hours • 19/04/2021 07:00-15:00 & 18:00- 07:00 (20/04) 23 hours 			
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>			
Given the duration of the NO _x (as NO ₂) exceedance no immediate environmental impact is expected from this limit exceedance.			
Cause (or suspected cause) of non-compliance:			
The underlying cause for these non-compliances is high temperatures in the Ammonia Recovery Unit (ARU) caused by high cooling water temperatures. The root cause of the ongoing ARU issues is that we are currently operating with significantly reduced cooling capacity (6-7 out of 9 cells) due to the sea water cooling tower failure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The rebuild of the cooling tower continues, with scheduled completion April 2022. Once all cells are back in service, issues attributed to elevated temperature will be mitigated. Regular updates (monthly) are provided to DWER on the status of this issue and the SWCT rebuilt.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 03/03/2021 30/03/2021 14/04/2021 13/05/2021	

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:	16	Date(s) of non-compliance:	23/04-04/06/2021
Details of non-compliance:			
Continuous monitoring of EC was not conducted for W1 between the 23 rd of April and 4 th of June 2021. This was due to the analyser giving erroneous readings.			
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 is expected as a daily samples were taken to ensure outgoing brine was under licence limits.			
Cause (or suspected cause) of non-compliance:			
Faulty analyser			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Analyser was replaced and continuous readings recommenced in April 2021. Whilst awaiting replacement, a daily sample was taken and analysed for EC. At no point did EC levels exceed the Licence limit of 75 000 µg/L.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally	Date: / /		
<input type="checkbox"/> Reported to DWER in writing	Date: / /		


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:	16	Date(s) of non-compliance:	11/04/2021 8/09/2021
Details of non-compliance:			
Insufficient samples (volume) was taken on the 11th of April and 6th of September 2021. MDEA and TRH was not analysed on the 6th of September and TSS for both samples were not analysed by a NATA accredited lab.			
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 is expected. TRH and MDEA has historically never been an issue for the ESB as it is mainly filled by stormwater. Also MDEA is not stored within the drainage area of the ESB.			
Cause (or suspected cause) of non-compliance:			
Competency of operational staff who did not collect sufficient sample volume. This non-routine sampling is usually undertaken by Environmental staff who were not available at the time of sampling.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Additional training of operators and laboratory staff in sampling requirements.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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:	20	Date(s) of non-compliance:	01/04-30/06/2021 Q2
Details of non-compliance:			
Noise monitoring could not be conducted in Q2 as the noise meter was not functioning and was returned to the manufacturer for repair. October (7th) was the earliest date monitoring could occur effectively making only two more monitoring events possible for the year as there must be 45 days between each quarterly monitoring events.			
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 is expected.			
Cause (or suspected cause) of non-compliance:			
Instrument failure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Noise meter repaired.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No			
<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.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		29/03/2022	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.