



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9240/2020/1	Licence file number:	DER2020/000039
Licence holder:	Tellus Holdings Ltd		
Trading as:	Tellus Holdings Ltd		
ACN:	138 119 829		
Registered address:	Suite 2, level 10, 151 Castlereagh Street SYDNEY NSW 2000		
Reporting period:	01/07/2022 to 30/06/2023		

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)
<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
Category 61: Liquid Waste Facility Category 61A: Solid Waste Facility Category 65: Class IV secure landfill site Category 66: Class V intractable landfill site	Total waste received – 16,570 t Treated liquid waste disposed to cell – 4,446t

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
Not applicable	



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:	7	Date(s) of non-compliance:	2022-2023
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Details of non-compliance:

Condition 7 of the Licence requires that the maximum period that wastes are permitted to be stored on site prior to permanent disposal is 12 months.

Some liquid chemical wastes and all radiation wastes received prior to the 30 June 2022 have been stored on site for a period of greater than 12 months.

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.

This is an administrative non-compliance. It is believed that there is no environmental impact because all wastes are stored in accordance with licence conditions. Radioactive materials stored at the Facility are contained in accordance with the approved Radiation Management Plan. All radioactive materials on site are packaged such that a minimum of two layers of containment are provided (e.g., sealed drums inside sea containers) and are stored in a bunded area. This is confirmed by regular RSO inspections and daily Facility Manager inspections.

Cause (or suspected cause) of non-compliance:

Temporary storage of radioactive material has exceeded 12 months due to a delay in regulatory approval.

Temporary storage of liquid waste that is not suitable for treatment in the Waste Immobilisation Plant (WIP) has exceeded 12 months due to regulatory delays in a L9240/2020/1 licence amendment to authorise processing of liquid waste outside of the WIP.

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

When Tellus informed DWER that radioactive material would soon reach the 12-month surface storage limit, mitigation measures currently in use were outlined. These will continue to be implemented, as required by the Facility's Site Registration (RS 210/2018 30289), and include:

- Radioactive material is stored within the 'low level radiation waste warehouse' and 'LLW, liquid waste storage yard', numbered as 21 and 24 respectively on Figure 3: Infrastructure Areas of Schedule 1 in the DWER Licence.
- All radioactive material is currently stored with three levels of containment, provided by the sealed package (bulka-bag, drum, IBC, etc.), within a sealed shipping container and located within an appropriately bunded storage area.
- Environmental gamma radiation surveys around the boundary of and within the radioactive material storage area are undertaken in accordance with the approved RMP.
- Surface wipe testing around the containers within the storage areas in accordance with the approved RMP.
- Regular inspections by the Facility Manager and Radiation Safety Officer (RSO), including checks of the condition of the shipping container(s).
- Air quality monitoring in accordance with the approved RMP.
- Personnel dose monitoring in accordance with the approved RMP.

An amendment to L9420/2020/1 to allow radioactive material to be transferred from temporary surface storage into permanent isolation in the cell has been approved and Tellus are currently reviewing radioactive waste inventory suitable for immediate disposal.

An L9420/2020/1 amendment authorising the treatment of liquid waste outside of the WIP was granted in June 2023. Portable facilities to process liquid wastes that cannot be treated in the WIP are expected to be operational by Q4 of 2023.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date:

Reported to DWER in writing

Date: 11/04/2023

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 particular¹. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Position:	General Manager Operations	Position:	Environmental Manager
Date:	28/08/2023	Date:	28/08/2023
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.



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:	15	Date(s) of non-compliance:	2022/2023
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Details of non-compliance:

Liquid wastes are treated through the Waste Immobilisation Plant (WIP) to solidify and immobilise the liquid waste so that no leachate will be generated. Condition 15 of the licence specifies that solidified PFAS waste must have a maximum PFAS concentration of 50 mg/kg.

Analysis of the treated material indicate the licence limit of 50 mg/kg of PFAS was exceeded on 9 occasions during the reporting period (between July 2022 and January 2023).

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.

Tellus is confident that no environmental impact has resulted from the exceedances due to the following:

- The average PFAS concentration of PFAS-Cement mixtures placed in the cell (24.7mg/kg) is less than half of the 50mg/kg licence limit.
- All Batch Exceedances were tested for free liquid and had free liquid less than 0.1%; therefore no leachate would be generated by waste placed in the Cell.
- Groundwater and soil-moisture monitoring at the waste storage cell has not identified any seepage or aquifer present beneath the cell.

Cause (or suspected cause) of non-compliance:

- Prior to the change in laboratory management in May 2023, senior staff were not informed of the exceedances.
- The exceedances were reported to Tellus' environmental department on 23/06/2023 and reported to DWER verbally on 23/06/2023 and in writing on 27/06/2023.

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

- The Laboratory Manager at Tellus who failed to report the 50mg/kg exceedances no longer works for Tellus.
- Operation of the WIP is now being overseen by the newly appointed General Manager of Operations.
- The WIP has not been operated since the exceedances were discovered.
- All PFAS Liquid Waste is currently being stored in a Quarantined Storage Area and is currently not being disposed of in cell.
- A new process is currently being developed at Tellus to avoid exceedances over 50mg/kg of PFAS in Treated Solidified PFAS Waste produced by the WIP. This process will include batch sheet calculations.
- The WIP will not be operated until the new procedure has been developed and staff have been fully trained to implement the new procedure.

Was this non-compliance previously reported to DWER?

Yes, and

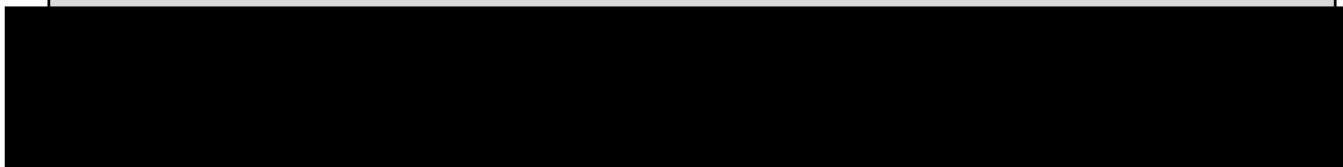
Reported to DWER verbally

Date: 23/06/2023

<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 27/06/2023
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