



## 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](mailto: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:	L9240/2020/1	Licence file number:	DER2020/000039
Licence holder name:	Tellus Holdings Ltd.		
Trading as:	Tellus Holdings Ltd.		
ACN:	138 119 829		
Registered business address:	Level 6, Allendale Square, 77 St Georges Terrace PERTH WA 6000		
Reporting period:	01 / 07 / 2023 to 30 / 06 / 2024		

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"><li>• section C;</li><li>• section D (if required); and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D (if required);</li><li>• section E; and</li><li>• sign the declaration in Section F.</li></ul>

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 chemical waste received – 44,379.76 t Total radioactive waste received – 3,060.26 t of unsealed radioactive waste and 433 sealed radioactive sources. Total waste disposed to cell – 41,675.25 t

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	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:	Ongoing
Details of non-compliance:			
<p>Condition 7 of the Licence requires that the maximum period that waste is permitted to be stored on site prior to permanent disposal is 12 months.</p> <p>Some chemical and radioactive wastes received prior to the 30 June 2023 have been stored on site for a period of greater than 12 months. A complete list of 12-month exceedances was provided to DWER on 19/08/2024.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>This is considered an administrative non-compliance with no believed environmental impact. All waste is stored in accordance with licence conditions, including bunded storage for liquid chemical wastes and daily inspections for leaks.</p> <p>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 Radiation Safety Officer inspections and daily Facility Manager inspections.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The delay in obtaining regulatory approvals required for the disposal of radioactive wastes has now been resolved and permits for the permanent disposal of these wastes are now being issued, which is allowing the backlog to be addressed.</p> <p>Certain chemical wastes require treatment before they can be disposed of permanently to the waste cell and the time required to develop and confirm the effectiveness of treatment methods has extended beyond 12 months.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Tellus has actively engaged with the DWER to address the backlog of liquid waste.</p> <p>In June 2023, the Licence was amended to allow for the treatment of liquid waste using portable equipment outside the Waste Immobilisation Plant.</p> <p>Additionally, Tellus is working closely with DWER on securing approvals for new liquid waste processing infrastructure, including the Air Pollution Control Residue Plant, Acid Neutralisation Plant, and PFAS Mixing Tank. This new infrastructure is expected to significantly reduce the</p>			

**Section E – Details of non-compliance with licence condition**

backlog of liquid waste that has been in temporary storage for over 12 months.  
 The delay in obtaining regulatory approvals for the disposal of radioactive wastes has been resolved, and permits for permanent disposal are now being issued. To ensure the highest environmental and safety standards, DSRS waste will be stored at the base of Cell 2. Construction of Cell 2 is anticipated to be completed in Q3 of 2025.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: 10/07/2024

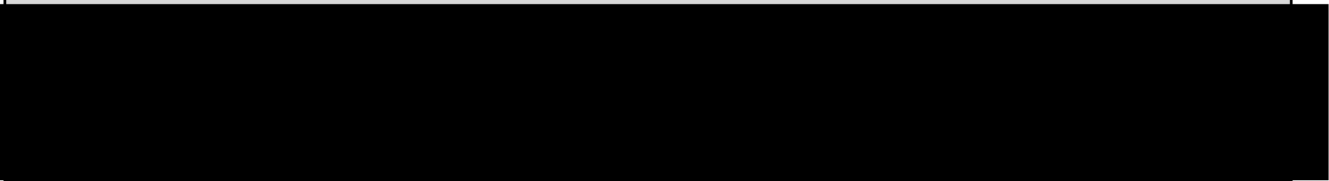
Reported to DWER in writing

Date: 12/06/2024

**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<sup>1</sup>.

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



Position:	Environmental Manager	Position:	Executive General Manager - Operations
Date:	29/08/2024	Date:	29/08/2024
Seal (if signing under seal):			

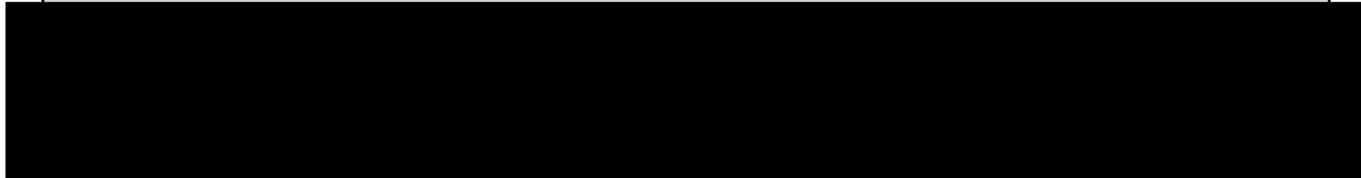


Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	9	Date(s) of non-compliance:	June 2024
Details of non-compliance:			
<p>Condition 9 specifies that the Licence Holder must ensure solid and liquid waste containers on the Premises remain closed, unless waste verification inspection or testing is being undertaken. An inspection of the temporary waste storage area identified a sea container with a door that wouldn't shut due to a damaged locking pin. An out of service tag identifying this issue had been placed on the container door on the 28/12/2023; however, the sea container still contained several IBCs of nitrosylsulphuric acid at the time of the audit indicating the container had been open for over 6 months.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>There was no environmental impact resulting from this non-compliance. Despite the door being ajar due to damaged locking pins, there was no risk of emissions because the nitrosylsulphuric acid was securely contained in sealed IBCs. Additionally, the container was stored in a paved and bunded area. Containers in temporary storage undergo daily inspections for leaks, which are promptly addressed. In this instance, no leaks were detected from the container.</p>			
Cause (or suspected cause) of non-compliance:			
<p>When the damaged locking pins were discovered, the container was correctly tagged as out-of-service. However, the process of destuffing the container and transferring the waste to another container was not completed as it should have been, leading to the non-compliance.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The damaged container was promptly destuffed and repaired. Additionally, the importance of keeping all containers closed when not in the process of destuffing or sampling was reinforced to operational staff during prestart toolbox meetings.</p>			
Was this non-compliance previously reported to DWER?			
<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 particular<sup>3</sup>.

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Position:	Environmental Manager	Position:	Executive General Manager - Operations
Date:	29/08/2024	Date:	29/08/2024
Seal (if signing under seal):			

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 (b)	Date(s) of non-compliance:	April – June 2024
Details of non-compliance:			
<p>Waste stabilisation and solidification process(es) and the quality assurance/quality control procedures had not been documented for each liquid waste stream in accordance with the requirements of Condition 16 (b) as follows:</p> <ul style="list-style-type: none"> <li>Although the Job Hazard Analyses documented the waste stabilisation and solidification process(es) for specific waste streams being treated with portable mixing equipment, there were no documented QA/QC testing requirements for each liquid waste stream.</li> <li>Procedure SR-09-PRO-015 did include QA/QC processes for liquid waste being treated through the WIP; however, these processes reflected QA/QC processes from the licence that was superseded in June 2023 and only included information specific to PFAS and AFFF waste streams.</li> <li>There was no specific documented procedure describing the waste stabilisation and solidification process(es) and the QA/QC requirements to be applied to the Sodium Hydroxide waste stream that had been treated through the WIP during the current reporting period.</li> </ul>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
This was an administrative non-compliance with no environmental impact. Soil-moisture monitoring at the base of Cell 1 indicates an absence of free liquid.			
Cause (or suspected cause) of non-compliance:			
Failure to update liquid waste processing and QA/QC procedures following the June 2023 licence amendment.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Tellus is updating procedures for waste stabilisation and solidification and associated QA/QC processes for all liquid waste streams.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	

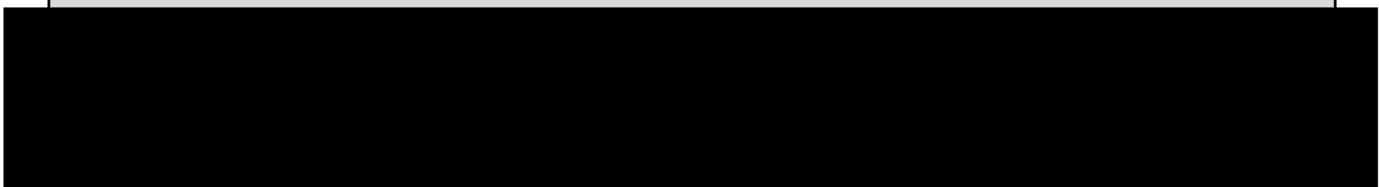
**Section E – Details of non-compliance with licence condition**

<input type="checkbox"/> Reported to DWER in writing	Date:    /    /
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**Section F – Declaration**

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Position:	Environmental Manager	Position:	Executive General Manager - Operations
Date:	29/08/2024	Date:	29/08/2024
Seal (if signing under seal):			

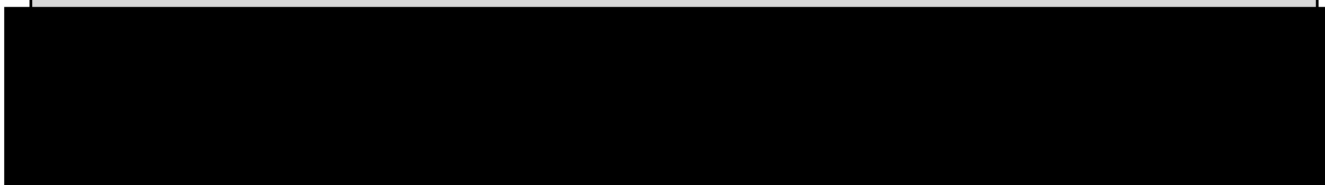
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	17	Date(s) of non-compliance:	April – June 2024
Details of non-compliance:			
<p>Treated liquid wastes had not been subjected to post- stabilisation and solidification verification sampling and analysis to verify that the treated wastes comply with process specifications defined in Condition 15 - Table 4 as follows:</p> <ul style="list-style-type: none"> <li>Records indicated that only one of the seven Sodium Hydroxide liquid waste batches processed through the Waste Immobilisation Plant (WIP) and placed in the cell had been subjected to 10 Clegg Impact Value tests.</li> </ul>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>There was no environmental impact resulting from this non-compliance. All seven batches of Sodium Hydroxide waste were processed in the Waste Immobilisation Plant (WIP) using a predetermined formulation of 20% NaOH waste, 5% cement, and 75% kaolin before being placed in the Cell.</p> <p>A representative sample achieved a Clegg Impact Value of 30.7 (average of 10 readings) and passed the free-liquid test with a result of 0.01%.</p> <p>Soil-moisture monitoring at the base of Cell 1 indicates an absence of free liquid.</p>			
Cause (or suspected cause) of non-compliance:			
Failure to update liquid waste processing and QA/QC procedures following the June 23 licence amendment.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Tellus is updating procedures for waste stabilisation and solidification and associated QA/QC processes for all liquid waste streams.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	



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Position:	Environmental Manager	Position:	Executive General Manager - Operations
Date:	29/08/2024	Date:	29/08/2024
Seal (if signing under seal):			

<sup>1</sup> 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.

<sup>2</sup> 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.

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