



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9280/2021/1	Licence file number:	DER2020/000597
Licence holder:	Atlas Iron Pty Ltd		
Trading as:	Atlas Iron Pty Ltd		
ACN:	110 396 168		
Registered address:	[REDACTED]		
Reporting period:	01/07/2021 to 30/06/2022		

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)
<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 5: Processing or beneficiation of metallic or non-metallic ore	4,814,950 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 85: Sewage facility	23.6 m ³ /day treatment (WWTP influent) 48.2 m ³ /day discharge
Category 89: Putrescible landfill site	294.4 tonnes

Section E – Details of Non-Compliance with Licence Condition
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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:	Condition 6, Table 4	Date(s) of non-compliance:	March 2022
Details of non-compliance:			
<p>Increased RO brine discharge to the irrigation spray field resulting in a combined wastewater:brine mix >60m³/day. In October 2022, the WWTP influent (47m³/day) and discharge capacity (61m³/day) monthly average exceeded both licence limits of 45m³/day and 60m³/day respectively.</p> <p>The Sanjiv Ridge Water Treatment Plant (WTP) is currently regulated under Category 85, with a discharge limit of 60m³/day, of which up to 15m³/day is RO brine discharge. The works approval (W6043/2017/1) assessed a wastewater: brine mix, and this is also approved under the Licence (refer Table 4).</p> <p>Volume change The Water Treatment Plant (WTP) is currently averaging approx. 55m³/day of RO brine (which exceeds the approved volume of 15m³/day and a combined wastewater: brine mix > 60m³/day). Based on the average recovery rate of 44% the WTP has the capacity to produce up to approx. 58m³/day of RO brine (based on a daily production of 45m³ of potable water), but we are currently averaging 55m³/day of RO brine.</p>			
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>Increased discharge of RO brine has the potential to impact vegetation, soil and runoff risk. Vegetation monitoring at the irrigation spray field noted stressed vegetation which is likely from increased RO brine discharge.</p> <p>Map: L9280/2021/1 (4 August 2021), Figure 3.</p>			
Cause (or suspected cause) of non-compliance:			
RO brine discharge volume from the WTP is more than originally estimated in pre-approvals which formed the basis of the DWER's decision to licence a 15m ³ /day limit of RO brine.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Actions taken to mitigate increased RO brine to the irrigation spray field:</p> <ul style="list-style-type: none"> • Reviewed WWTP and WTP data following identification of exceedance; • Replaced flow meter readings at the WWTP influent, RO reject water (brine) and irrigation spray field • Installed infrastructure at the Camp to divert RO brine to use for irrigation (following dilution with raw water as required to maintain a combined TDS of less than 2,500 mg/L). <p>Proposed actions during FY23:</p> <ul style="list-style-type: none"> • Use of RO brine for dust suppression (either stored in a tank or Turkey's nest); and/or • Apply for a licence amendment to increase the size of the irrigation spray field 			
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 (correspondence with Alana Kidd)

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:	13, Table 6	Date(s) of non-compliance:	1 January 2022
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Details of non-compliance:

January 2022 Quarterly WWTP laboratory results returned an exceedance for Total Suspended Solids of 58mg/L exceeding the licence limit of 30mg/L.

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.

There was no actual (or suspected) environmental impact of the non-compliance.

Cause (or suspected cause) of non-compliance:

Likely cause of increased TSS is due to insufficient processing times through the WWTP.

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

Actions taken to prevent a recurrence:

- Reviewed WWTP performance and daily monitoring data;
- Re-sampled sample point in February 2022 which returned a TSS result of 10 mg/L;
- Quarterly sampling in May 2022 confirmed lower TSS values in subsequent testing (<5 mg/L).

Was this non-compliance previously reported to DWER?

Yes, and

<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: July 2022

Section F – Declaration

Department of Water and Environmental Regulation

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.

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.