



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:	Level 17, 300 Murray Street PERTH, WA, 6000		
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 5: Processing or beneficiation of metallic or non-metallic ore	5,001,493 tonnes per annual period


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	32.4 m ³ /day of effluent, plus 71.1 m ³ /day discharge
Category 89: Putrescible landfill site	305 tonnes per annual period

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:	Condition 1, Table 1	Date(s) of non-compliance:	March 2022																
Details of non-compliance:																			
<p>L9280/2021/1 was amended on 29 May 2023. The amendment increased the permissible volume of wastewater:reverse osmosis (RO) brine discharge from a combined total of 60 m³/day to 105 m³/day. This included an increase in the RO brine limit from 15 m³/day to 60 m³/day. The treated wastewater component of the total limit remained at 45 m³/day.</p> <p>January, March and April treated effluent (combine treated effluent: RO brine) exceeded licence limits:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>January</th> <th>March</th> <th>April</th> </tr> </thead> <tbody> <tr> <td>Effluent (m³/day)</td> <td>38.3</td> <td>38.0</td> <td>25.5</td> </tr> <tr> <td>RO brine (m³/day)</td> <td>72.5</td> <td>64.9</td> <td>87.8</td> </tr> <tr> <td>Discharge to sprayfield (m³/day)</td> <td>61.1</td> <td>73.0</td> <td>73.5</td> </tr> </tbody> </table> <p>Volume change During the reporting period from March 2022 to June 2023, the volume of RO brine discharged to the sprayfield exceeded 60 m³/day, reaching a monthly average for the year of 55.6 m³/day and 71.7 m³/day, respectively. Following investigation, the volume change is believed to be caused by relief plumbers watering the lawn with potable water that has increased the volume of RO brine produced. Atlas has also identified a potential error in RO volumes or treated effluent, as calculations have identified the total discharge volumes do not equal RO brine and effluent combined.</p>				Parameter	January	March	April	Effluent (m ³ /day)	38.3	38.0	25.5	RO brine (m ³ /day)	72.5	64.9	87.8	Discharge to sprayfield (m ³ /day)	61.1	73.0	73.5
Parameter	January	March	April																
Effluent (m ³ /day)	38.3	38.0	25.5																
RO brine (m ³ /day)	72.5	64.9	87.8																
Discharge to sprayfield (m ³ /day)	61.1	73.0	73.5																
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>Chemical analysis of RO brine was conducted as part of the wastewater treatment plant (WWTP) commission audit and collation of data for the licence amendment application, including a risk assessment of impacts to vegetation, soil and runoff. This assessment concluded that increasing RO brine discharge substantially would not result in significant nutrient loading in the receiving environment.</p> <p>RO brine is concentrated groundwater, which analysis shows, maintains relatively low concentrations of salts and solids. Results from post-commissioning testing of the potable water in early 2020, showed the RO brine had a TDS concentration of 959.7 mg/L, whilst raw groundwater had a TDS concentration of 633.4 mg/L (well below 2,500 mg/L).</p> <p>Map: L9280/2021/1 (May 2023), Figure 1 of the 2021 to 2023 AER.</p>																			
Cause (or suspected cause) of non-compliance:																			
<p>Whilst the capacity of the WWTP is sufficient to support the increased number of residents at the accommodation camp as the Project expands, the previous licence allowance of 15 m³/day RO brine was insufficient to meet the potable water demand.</p> <p>Atlas submitted an application to amend L9280/2021/1 on 16 December 2022 and this was approved on 29 May 2023. Prior to approval of the amendment, plumbers watered the camp lawn with potable water instead of RO brine, which increased the production of RO brine created from groundwater at a rate of 4:6 (potable water and RO brine).</p>																			

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The Atlas Maintenance Team has been advised to water the camp lawn with RO brine only unless approved by the Environmental Advisor. Flowmeters have also been checked for accuracy and it was identified that the RO brine flowmeter should be investigated. RO brine has not yet been diverted from the sprayfield to the Turkey's nest or to use for dust suppression but this is expected to be implemented during the 2023/2024 reporting year.	
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: July 2022 (2022 AACR) and 16/12/2022 (application to amend L9280/2021/1)

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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		25/07/2023	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.