



Government of **Western Australia**
Department of **Water and Environmental Regulation**

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4328/1989/10	Licence file number:	DER2013/001044
Licence holder:	Wodgina Lithium Pty Ltd		
Trading as:	Same as Above		
ACN:	611 488 932		
Registered address:	1 Sleat Rd APPLECROSS WA 6153		
Reporting period:	01/07/2017 to 30/06/2018		

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	4,029,239 t
Category #54 – Sewage Facility	105 m ³ /day
Category #89 – Putrescible Landfill Site	1,927 t

IR-F14 v2.0

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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 #54 – Sewage Facility	Waste Type	Units	Discharge
	Biological Oxygen Demand (BOD)	kg/day	2.922
	Total Suspended Solids (TSS)	kg/day	8.997
	Total Nitrogen (TN)	kg/day	1.467
	Phosphorus	kg/day	0.740
	E.Coli Bacteria	ML/day	0.644

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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:	1.3.6	Date(s) of non-compliance:	8/06/2018
Details of non-compliance:			
Facultative Ponds: A minimum top embankment freeboard of 350mm was believed to not be maintained at all times following Environmental Field Report 06608			
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.			
At the time of reporting through a Section 72 – Waste discharge to Land, it was considered at the time that the potential for harm to the surrounding environment due to the transfer of treated waste water was 'NIL' to 'negligible'.			
Cause (or suspected cause) of non-compliance:			
Following heavy rainfall (85mm/48hrs) at Wodgina over the 6th and 7th June 2018, the WWTF ponds approached maximum freeboard.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
In order to ensure the pond freeboard was not exceeded, excess treated waste water (1,803m ³) was transferred via water cart to the Dragon Pit between 9-21 June 2018. Dragon Pit is not a prescribed premise under licence L4328/1989/10 at the time of the event.			
The evaporation ponds have been scarified, and the eroded windrows repaired to promote infiltration and ensure a freeboard of 200mm is maintained (compliance against condition 1.3.6) even at maximum capacity.			
In an attempt to promote increased digestion and water quality, WLPL also began aerating the 6 facultative ponds.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 8 / 06 / 2018	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 26 / 06 / 2018	

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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:	1.3.7 (f)	Date(s) of non-compliance:	8/06/2018
Details of non-compliance:			
<p>As the result of a rainfall event that did not constitute an 'extreme rainfall event' (<i>greater than 1 in 10 year event of 72 hours duration</i>), discharge from the evaporation ponds was transferred via water cart to the Dragon Pit (672966.126mE / 7654482.583mN) between 9-21 June 2018. Dragon Pit is not a prescribed premise under licence L4328/1989/10. Although the discharge was notified to DWER under a Section 72, inspectors noted during Environmental Field Report 06608, that this was in contravention to the licence.</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>At the time of reporting through a Section 72 – Waste discharge to Land, it was considered at the time that the potential for harm to the surrounding environment due to the transfer of treated waste water was 'NIL' to 'negligible'.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Following heavy rainfall (85mm/48hrs) at Wodgina over the 6th and 7th June 2018</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>In order to minimise the effects of the recent rainfall event, WLPL used multiple licenced contractors to remove approximately 800m³ of raw sewage from the facultative ponds to be processed off site by a licenced contractor. This was carried out to further minimise discharge relating to condition 1.3.7, in addition to also achieving condition 1.3.6.</p> <p>Upgrade of the existing system to full evaporation (no infiltration) based on the engineering works completed by Aerison</p> <ol style="list-style-type: none"> This will involve the construction of 2 additional facultative ponds, (FAC #7 & 8), and 2 additional Evaporation ponds (Evap #5 and 6) which will both be lined. By carrying out this work, WLPL will ensure adequate capacity of the system is achieved and maintained, and that the required freeboard is met. Related to <u>conditions 1.3.6</u>, whilst also ensuring the treatment plant can maintain and comply with <u>condition 1.3.7</u>. Will involve the sequential draining, drying and lining of existing evaporation ponds 1 through 			

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Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 8 / 06 / 2018
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 26 / 06 / 2018

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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:	1.3.9	Date(s) of non-compliance:	13 / 06 / 2018
Details of non-compliance:			
Failure to undertake inspections as detailed in Table 1.3.4; Daily			
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.			
The failure to comply with condition 1.3.9 may have led to the events following, which required a section 72 notification, however this cannot be confirmed. Thus, environmental impact is believed to be 'NIL' to 'negligible'			
Cause (or suspected cause) of non-compliance:			
Failure in maintenance records and communication of licence conditions			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Daily inspection sheets have been generated for the WWTF and are currently in use as per licence condition 1.3.9.			
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: 4 / 07 / 2018	

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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)	SIMON PIGOZZO	Name: (printed)	
Position:	ENVIRONMENTAL ADVISOR	Position:	
Date:	26 / 10 / 2018	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.