



## Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L4612/1989/11	Licence file number:	2012/006877
Licence holder:	BHP Nickel West		
Trading as:	Nickel West Leinster		
ACN:	004 184 598		
Registered address:	125 St Georges Terrace Perth WA 6000		
Reporting period:	01/08/2017 to 31/07/2018		

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"><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 at 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.	
<b>Prescribed Premises Category</b>	<b>Actual Production Quantity</b>
5	2,558,609 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.	
<b>Prescribed Premises Category</b>	<b>Actual Part 2 Waste Discharge Quantity</b>
6	782,133 tonnes
57	<500 tyres at any one time
64	1413.03 tonnes
85	Average 34.09m3 per day

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:	W15	Date(s) of non-compliance:	17 April 2018
Details of non-compliance:			
On Tuesday 17 April 2018, the required minimum 300mm freeboard (stipulated by condition W15 of Licence 4612) was not maintained in the Leinster Nickel Operation TSF 3 decant pond facility. This was an administrative non-compliance.			
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.			
The overall capacity of the decant pond was exceeded in low lying sections, however all water was contained within facility perimeter bunding, resulting in no discharge to environment. No environmental impact occurred as a consequence of this event.			
Cause (or suspected cause) of non-compliance:			
The primary cause of this event was a mechanical fault causing the decant facility discharge pumps to trip at approximately 1730 on 17 April 2018 and stop functioning. The pumps were reset by 1830, however tripped and stopped functioning again shortly after. Additional efforts to re-start the pumps during the course of the nightshift were unsuccessful..			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Nickel West has implemented a number of corrective action in response to this incident including dredging the sediment from the decant pond to increase storage capacity, reviewed training on TSF design, operation and management practices, improved alarms in the DCS system and installed visual markers in the pond.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> No			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date:    /    /	
<input type="checkbox"/> Reported to DWER in writing		Date: 19/ 04/2018	


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:	W7	Date(s) of non-compliance:	13 March 2018
Details of non-compliance:			
On Tuesday 13th March 2018, quarterly monitoring of MB42 observed the standing water level to exceed the 4m groundwater level limit (Condition W7) identified during a routine review of monitoring data provided by groundwater monitoring consultants.			
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.			
No environmental impact occurred as a consequence of this event.			
Cause (or suspected cause) of non-compliance:			
Groundwater level increased at MB42 due to a malfunction of the MB06 recovery bore resulting in reduced seepage recovery.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A replacement pump was installed as soon as possible, in addition an additional pump was ordered to ensure there is a spare readily available. Replacement pumps have a greater draw capacity compared to the original MB06 recovery bore pump. Repeat monitoring of this bore completed on the 18/4/2018 indicated the bore has returned to below the 4m licence condition requirement.			
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: 20/04/2018	



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:	W21	Date(s) of non-compliance:	1 <sup>st</sup> February 2018
Details of non-compliance:			
On Thursday 1st February 2018, a fault in the “high level” indication sensor resulted in an overtopping event from the final irrigation tank at the Leinster Nickel Operation Waste Water Treatment Plant (WWTP). On inspection, the released material was found to contain hydrocarbon.			
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.			
All released material was contained to an adjacent concrete pad and previously disturbed area. No environmental impact occurred as a consequence of this event.			
Cause (or suspected cause) of non-compliance:			
A fault on a high level sensor in the ‘aeration tank’ resulted in a release of liquid effluent to the immediate area surrounding the WWTP. On inspection, hydrocarbons were identified as being present in the system. Further investigations indicated the hydrocarbons originated from an oil water separator.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Earthen bunding was constructed to contain the released material to within the area adjacent to the facility. Residual contents of the WWTP and associated site drainage system were removed. Impacted soil from around the WWTP was collected and stockpiled within the site Restricted Access Landfill facility (Class 2), prior to removal offsite by a waste contractor to an appropriately licenced facility. Due to the presence of hydrocarbon in the WWTP system, septic material remaining within the WWTP and associated drainage system was removed and disposed offsite, at an appropriately licenced facility. Work to repair the high-level sensor has been completed.			
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: 16/02/2018	

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:	W6(a)	Date(s) of non-compliance:	30 October 2018
Details of non-compliance:			
<p>During preparation and data review for the Nickel West Leinster Annual Environment Report – DWER (1st August 2017 - 31st July 2018), Nickel West became aware of the following missing groundwater data:</p> <p>MB53 Standing Water Level (06 December 2017) – Unable to be sampled            EPMB05B Evaporation Pond Standing Water Level (20 September 2017) – Unable to Locate            MB53 Annual Ni and TDS (07 December 2017) – Unable to be sampled            MB56 Annual Ni and TDS (06 December 2017) – Unable to be sampled            EPMB02A Annual Ni and TDS (08 December 2017) – Unable to be sampled            EPMB12 Annual Ni and TDS (08 December 2017) – Unable to be sampled</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>No environmental impact has occurred as a consequence of missing groundwater data This non-compliance is administrative only.</p>			
Cause (or suspected cause) of non-compliance:			
Reason for bores unable to be sampled include bore inaccessible or unsafe to access, bore dry, bore blocked.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Nickel West will implement a bore maintenance program to address issues with collecting groundwater samples.			
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: 30/10/2018 (NLN AER 2018)	

## 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.			
Signature <sup>2</sup> :		Signature:	
Name: (printed)	Chris Stone	Name: (printed)	
Position:	General Manager Nickel West Northern Operations	Position:	
Date:	29/10/18 .	Date:	
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.