

## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L6453/1990/12	Licence file number:	2011/009443
Licence holder:	BHP Billiton Nickel West Pty Ltd		
Trading as:			
ACN:	004184598		
Registered address:	125 St Georges Terrace PERTH 6000		
Reporting period:	01/01/2020 to 31 /12 /2020		

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.	
Prescribed Premises Category	Actual Production Quantity
Category 5 Processing or beneficiation of metallic or non- metallic ore	Total Ore Treated/Milled - 10,833,656 tonnes
Category 54 Sewage facility	291m <sup>3</sup> per day
Category 57 Used Tyre Storage	Average 49 tyres stored at one time
Category 64 Class II putrescible landfill	2258 tonnes
Category 73 Bulk storage of chemicals	5953m <sup>3</sup> in aggregate

### 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 5 Processing or beneficiation of metallic or non-metallic ore	Tailings to TSF - 10,833,656 tonnes

### 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:	1.3.8. (a)	Date(s) of non-compliance:	2020 Reporting Period: 19/2; 11/3, 18/3; 2/4; 19/7; 3/8; 10/11; and 10/12
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Details of non-compliance:

Condition 1.3.8. requires the Licensee shall:

- (a) undertake inspections as detailed in Table 1.3.2;
- (b) where any inspection identifies that an appropriate level of environmental protection is not being maintained, take corrective action to mitigate adverse environmental consequences as soon as practicable; and
- (c) maintain a record of all inspections undertaken

**Table 1.3.2: Inspection of infrastructure**

Scope of inspection	Type of inspection	Frequency of inspection
Tailings pipelines	Visual	12 hourly
Return water lines	Visual	12 hourly
External walls of the TSF	Visual	24 hourly
Borefield pipelines, pump stations	Visual	24 hourly
Contingency tailings delivery pipeline 291 and associated bunding	Visual check of physical integrity	Prior to discharge of tailings into pipeline 291 and 6 hourly while in operation

Inspection records were not maintained to reflect completion of all required 12 hourly TSF inspections, during the 2020 reporting period.

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.

No environmental impact was identified as a result of the event.

Cause (or suspected cause) of non-compliance:

It could not be determined if the inspections were not completed, or if records were not documented following all TSF inspections.

Records were evident for all but 8 individual nightshift checks across the 12 month period.

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

Additional verification of inspection records has been implemented with Environment personnel auditing inspection records periodically across the 2021 reporting period.

## Department of Water and Environmental Regulation

Was this non-compliance previously reported to DWER	
<input checked="" type="checkbox"/> No or <input type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date:

### 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:	1.3.4	Date(s) of non-compliance:	19 December 2020
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Details of non-compliance:

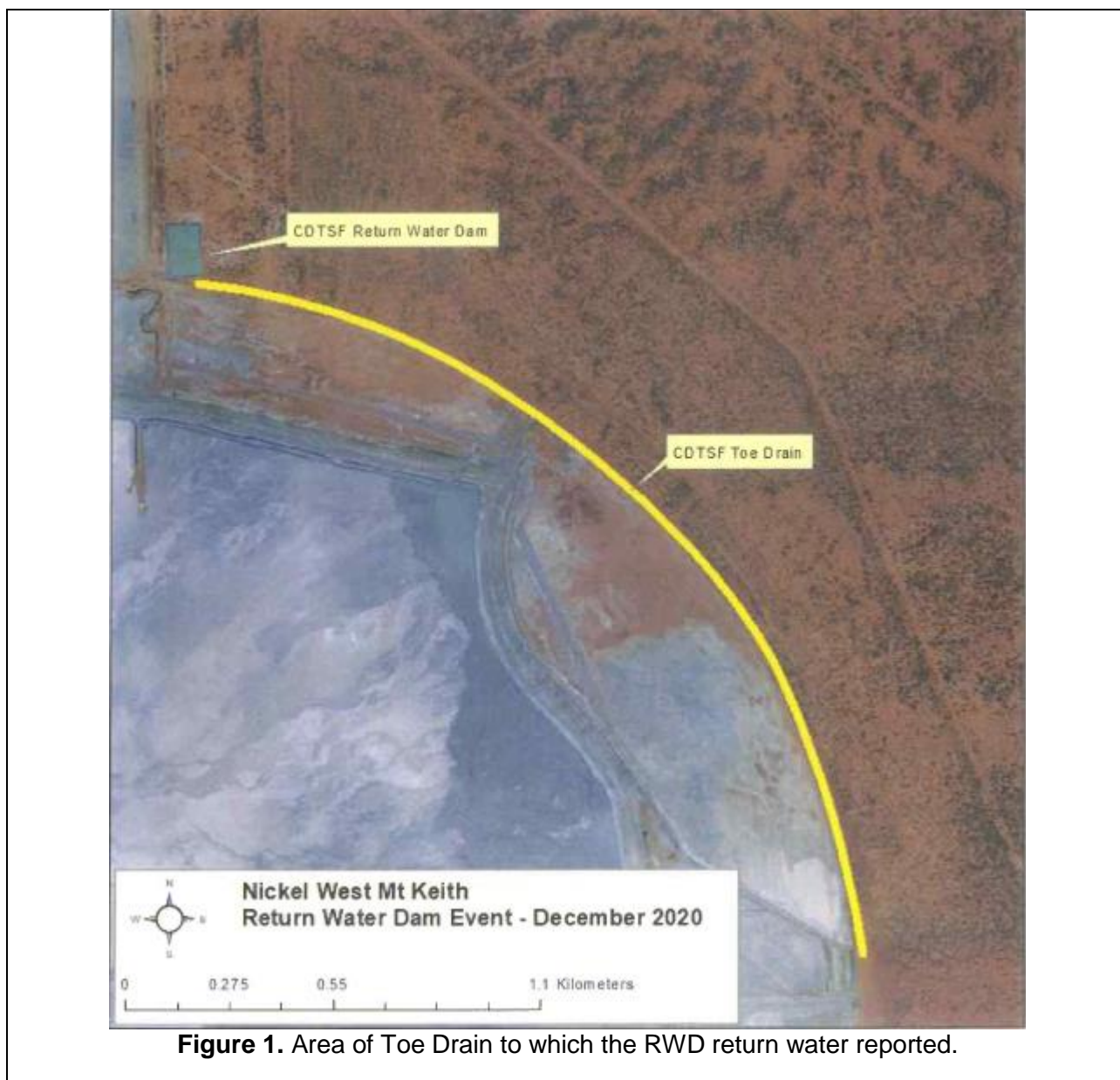
Condition 1.3.4 of Licence L6453/1990/11 requires the Licensee to manage containment cells, dams or ponds in Table 1.3.1 such that a minimum top of embankment freeboard of 300mm or a 1 in 100 year/72 hour storm event (whichever is greater) is maintained. Table 1.3.1 "Containment Infrastructure" identifies the HDPE lined Decant Pond as a containment structure within the prescribed premise boundary of L6453/1990/11

A release of centralised discharge tailings storage facility (CDTSF) return water, from the Mt Keith CDTSF Return Water Dam (RWD), occurred at approximately 21:50 pm on Saturday December 19 2020. This event was identified during a routine daily inspection by the site Water Services technician, at approximately 05:45 am the following day (Sunday December 20).

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.

No environmental impact occurred. Water remained within the dam infrastructure.



**Figure 1.** Area of Toe Drain to which the RWD return water reported.

Cause (or suspected cause) of non-compliance:

- Thunderstorm activity resulted in an outage of the telemetry link between the RWD and the Mt Keith Concentrator Plant.
- The loss of telemetry caused the inflow pumps that fill the RWD to cease operation. Due to the prolonged period of the telemetry outage, the decant pumps were started in 'local' at approximately 18:00 pm that day.
- One of the pumps that direct water from the WRD to the Concentrator Plant was then started. As only the smaller pump was started (in error), flow into the RWD exceeded the rate of discharge out of the facility resulting in an increase in the volume of water retained in the RWD beyond the licence freeboard level.

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

The ability to operate the CDTSF decant pumps (that feed the RWD) in 'local' has been removed, through incorporating a system interlock. This action will prevent the pumps from being manually started when the telemetry system is unavailable, thereby avoiding a repeat of this event.

Was this non-compliance previously reported to DWER?

No or  Yes, and

Department of Water and Environmental Regulation

<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 04 March 2021

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:	2.3.1	Date(s) of non-compliance:	2020 Reporting Period
Details of non-compliance:			
<p>Condition 2.3.1, Table 2.3.1 requires annual sampling of bores for pH, TDS, selenium, copper, zinc and nickel and quarterly monitoring of standing water levels and record and investigate results that do not meet the specified limits.</p> <p>During the reporting period;</p> <ul style="list-style-type: none"> <li>Water level data from KMB13 could not be collected during Q3 (July) due to the monitoring point being inaccessible on account of poor ground conditions (area was subject to local inundation making the ground conditions boggy).</li> </ul> <p>Nickel West became aware of the missing data during preparation of the Nickel West Mount Keith Annual Environment Report 2020.</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 is anticipated due to the missing standing water level data. Please refer to Appendix 1. <a href="#">Figure 2</a></p>			
Cause (or suspected cause) of non-compliance:			
Localised inundation with water due to water level at this location being typically at or above ground level.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Nickel West will improve access to KMB13 as necessary to allow for monitoring under all ground conditions.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No or <input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally	Date: / /		
<input type="checkbox"/> Reported to DWER in writing			

**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:	1.3.10	Date(s) of non-compliance:	2020 Reporting Period
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Details of non-compliance:

Condition 1.3.10. the Licensee shall ensure that where wastes produced on the Premises are not taken off-site for lawful use or disposal, they are managed in accordance with the requirements in Table 1.3.3.

Waste type	Management Strategy	Requirements <sup>1,2</sup>
Inert waste type 1	Receipt, handling, associated storage and disposal of waste by landfilling	No more than 2200 tonnes per year of all waste types cumulatively shall be disposed of by landfilling; disposal of waste by landfilling shall only take place within the landfill area shown on the Landfill Area Map in Schedule 1; the separation distance between the base of the landfill and the highest groundwater level shall not be less than 2m; Waste shall be placed in a defined trench or within an area enclosed by earthen bunds; and the Licensee shall ensure that the tipping area is less than 30 metres in length. Ensure that no wind-blown waste escapes from the Premises and that wind-blown waste is collected on at least a fortnightly basis and returned to the tipping area. Hazardous solids shall be disposed of to the approved on site disposal facility located in TSF 1, or exported off site for disposal.
Inert waste type 2		
Putrescible waste		
Clean Fill		
Hydrocarbon contaminated waste	Bioremediation	Ensure soil is bioremediated by: <ul style="list-style-type: none"> <li>maintaining a suitable soil thickness</li> <li>maintaining an appropriate moisture content and nutrient level within the soil which sustains biological activity;</li> <li>at least quarterly soil aeration; and</li> <li>disposal of hydrocarbon contaminated waste shall only take place within the bioremediation area shown in Schedule 1.</li> </ul>

During the 2020 reporting period, 2258 tonnes of putrescible waste was sent to landfill; exceeding the licence limit (currently 2200 tonnes per year) by 58 tonnes for all waste types.

The Prescribed Premise Category Production or Design Capacity limit applied to Category 64 “Class II Landfill” on L6453/1990/12 (20 Tonnes or more per year) has not been exceeded.

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.

No environmental impact was identified as a result of the event.

All putrescible waste landfilled was disposed in appropriately designed facilities, with landfills located as per the Landfill Area map provided as Schedule 1 to L6453/1990/12.

Cause (or suspected cause) of non-compliance:

The landfill forecast, which was applied to the licence during the 2015 reissue does not account for increases in site population and operation activity that have occurred since 2015.

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

An improved methodology for monitoring and forecasting landfill waste disposal volumes at Mt Keith will be implemented. If necessary, an application to amend Table 1.3.10 will be lodged.

Was this non-compliance previously reported to DWER?

## Department of Water and Environmental Regulation

<input type="checkbox"/> No or <input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 31 /03 /2021
<input type="checkbox"/> Reported to DWER in writing	

### 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)		Name: (printed)	
Position:		Position:	
Date:		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.