



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L6942/1997/13	Licence file number:	DER2013/000329
Licence holder:	BHP Iron Ore Pty Ltd		
Trading as:	BHP Iron Ore Pty Ltd		
ACN:	008 700 981		
Registered address:	Level 1, City Square Brookfield Place 125 St Georges Terrace PERTH WA 6000		
Reporting period:	01/07/2020 to 30/06/2021		

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)

Yes – please complete:

- section C;
- section D if required; and
- sign the declaration in Section F.

No – please complete:

- 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
5 – Processing or beneficiation of metallic or non-metallic ore	30.4 Mt
63 – Class 1 inert Landfill	1,329 t
85 – Sewage Facility	16.15 m ³ /day

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
6 – Mine dewatering	16.45 GL

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 3.3.1 (Monitoring of emissions to land)	Date(s) of non-compliance:	1/12/2020
Details of non-compliance:			
pH was not sampled for when undertaking routine quarterly monitoring of emission point L1, which is the treated wastewater from the final discharge tanks at OB25 Sewage treatment plant. All other parameters were sampled for.			
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 known or suspected environmental impact.			
Cause (or suspected cause) of non-compliance:			
Cause according to external party that conducts routine sampling was “Upon investigation Field pH has been missed due to a process error that filtered through from the field to admin”.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The missed pH will be added to contractor’s December KPI missed log and will be a topic of discussion at the next contractor toolbox talk to ensure that this does not reoccur. In addition to this, all contractors being supervised will be informed of the missed sample. BHP also conducts verifications of samples taken versus samples planned to be taken before each end of month period.			
Was this non-compliance previously reported to DWER?			
<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			
Condition no:	Condition 1.3.7 Containment Infrastructure	Date(s) of non-compliance:	10/03/2021
Details of non-compliance:			
<p>During an inspection of the lined evaporation ponds at OB24 it was observed that an overflow has occurred which contains the treated water from the oily water separators (OWS 1352-OHP; OWS 1353 HV/LV washpad; and OWS 1354 MEM). This overflow resulted in a breach of the requirement to maintain a vertical freeboard of 300 mm.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>There has been no known or suspected environmental impact. Overflow water was sampled on the 10/03/2021 and returned a reading of <100 µg/L of total TRH.</p> <p>This water is pumped up to the licenced monitoring point P1 – Orebody 24 Turkey’s Nest which has a limit of TRH < 15 mg/L.</p> <p>Soil samples taken on 23/03/2021 from the area where the overflow occurred resulted in TRH levels below NEPM guidelines of commercial & industrial trigger values for each TRH fraction.</p>			
Cause (or suspected cause) of non-compliance:			
<p>A pump facilitates transfer of the treated wastewater from the lined evaporation ponds at Orebody 24 to the Turkey’s Nest. A power outage of the substation which supplies power to the pump caused the pump to stop which subsequently resulted in an overflow of the lined evaporation ponds and the discharge of approximately 1,000 L of treated waste water potentially containing hydrocarbons onto unsealed ground adjacent to the dam.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Area was contained and overflow was vacuumed up and water levels were brought down to 300 mm freeboard and relocated by licensed waste contractor.</p> <p>Water samples and soil samples were taken.</p> <p>Procedure will be created to ensure that there is a process to follow in terms of communications to stakeholders.</p> <p>Alarm system to be created in case of pump failure to avoid reaching 300mm freeboard and overtopping event.</p>			
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: 11/03/2021	

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:	Condition 1.3.7 Containment Infrastructure	Date(s) of non-compliance:	14/4/2021
Details of non-compliance:			
Due to high rainfall and lack of capacity within the OB25 Oily Waste Water Treatment System (OWWTS), the facility has overflowed, with approximately 100 L leaving the facility.			
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 has been no known or suspected environmental impact. Overflow water was sampled on the 14/04/2021 and returned a reading of <100 µg/L of total TRH.			
Cause (or suspected cause) of non-compliance:			
Heavy rainfall and minimal capacity within the OWWTS caused an overflow of the facility.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Significant volume vacuumed out and taken offsite by a licenced waste contractor to ensure that there is no re-occurrence. Water samples of the liquid that breached the facility were obtained. The facility pump has been inspected and a work notification has been raised and actioned in order to ensure increased capacity to manage high rainfall events.			
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: 14/04/2021	

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:	Condition 1.3.7 Containment Infrastructure	Date(s) of non-compliance:	21/04/2021
Details of non-compliance:			
During an inspection of the OB24 lined evaporation ponds at OB24 it was observed that an overspill has occurred. These ponds contain the treated water from the oily water separators (OWS 1352-OHP; OWS 1353 HV/LV wash-pad and OWS 1354 MEM). This overspill resulted in a breach of the limit of the requirement to maintain a vertical freeboard of 300 mm.			
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 has been no known or suspected environmental impact. Overflow water was sampled on the 21/04/2021 and returned a reading of <100 µg/L of total TRH.			
This water is pumped up to the licenced monitoring point P1 – Orebody 24 Turkey's Nest which has a limit of TRH < 15 mg/L.			
Cause (or suspected cause) of non-compliance:			
The P1 – OB24 Turkey's Nest was at capacity as only one water cart was able to service it, therefore the turkey's nest could not be recharged by the evaporation ponds.			
As the HV/LV wash-pads were still being used, the evaporation ponds subsequently filled up from the output of the oily water separators and overtopped. Approximately 1,000 L of treated wastewater potentially containing hydrocarbons were released onto unsealed ground adjacent to the lined ponds.			
This event also resulted in the vertical freeboard of 300 mm not being maintained in the evaporation ponds.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Area was contained and overflow was vacuumed up and water levels were brought down to 300 mm freeboard and relocated by licensed waste contractor.			
Water samples and soil samples have been taken.			
Weekly inspections of the ponds were changed to daily until the issue was resolved.			
Water samples from the overflow taken on the 21/04/2021 returned TRH levels below the limit of reporting (<100 µg/L).			
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: 22/04/2021	


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:	Condition 1.3.7 Containment Infrastructure	Date(s) of non-compliance:	27/04/2021
Details of non-compliance:			
Licence Condition 1.3.7 states that the Bioremediation facility has to have a HDPE liner to achieve permeability of 1×10^{-9} m/s or less. The facility was constructed as part of the OB24 upgrade Works Approval (W4892) and constructed/operated to comply with Water Quality Protection Note 27; on this basis the facility was approved and accepted to be compliant by DWER. When the licence was updated in 2015 the specifications of the facility were modified such that the facility is no longer compliant.			
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 as this is an administrative error.			
Cause (or suspected cause) of non-compliance:			
During the licence review in 2015, the change of the wording to describe the infrastructure containment was not identified.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Licence Holder will apply for the wording to be corrected in an upcoming Licence Amendment.			
Was this non-compliance previously reported to DWER?			
<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			
Condition no:	Condition 1.3.7 Containment Infrastructure	Date(s) of non-compliance:	20/06/2021
Details of non-compliance:			
OB24 Oily Waste Water Treatment Plant Evaporation pond has breached its 300 mm vertical free board due to significant rainfall levels and low capacity at the OB24 Oily Waste Water Treatment Plant.			
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 as no discharge occurred.			
Cause (or suspected cause) of non-compliance:			
Level alarms not monitored.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Called control and checked that level alarms and pond pumps were operational. The facility pump was inspected, and a work notification was raised and actioned in order to ensure increased capacity to manage high rainfall events is available.			
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: 15/04/2020	

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 particular¹.

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)	Brandon Craig	Name: (printed)	
Position:	Asset President Western Australian Iron Ore (WAIO)	Position:	
Date:	30/08/2021	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.