



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Once completed, please submit this form either via email to info-der@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 33 Cloisters Square
PERTH WA 6850

Section A – Licence Details			
Licence number:	L8437/2010/3	Licence file number:	2012/000069
Licence holder:	BHP Billiton Nickel West Pty Ltd		
Trading as:			
ACN:	004 184 598		
Registered address:	125 St Georges Terrace Perth WA 6000		
Reporting period:	01/ 11 / 2019 to 31/ 10 / 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">• 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
31 Chemical manufacturing	907.65 tonnes of hydrogen sulphide gas
34 Oil or gas refining	4,210.04 tonnes of H ₂ gas
44 Metal smelting or refining	69,653.63 tonnes nickel metal
67 Fuel burning	6,424 kg of natural gas per hour

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
N/A	

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 8	Date(s) of non-compliance:	24/09/2020
Details of non-compliance:			
At approximately 13:00 hours, on the 24th September 2020, emissions from the Tail Gas Scrubber exceeded the ammonia gas emission limit of <0.75 % v/v for approximately 1hr 55min past the allowable time for troubleshooting.			
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 as a result of non-standard operating conditions. Please refer to attachment 3, emission point 14 in the licence (L8437/2010/3) for location of Tail Gas Scrubber.			
Cause (or suspected cause) of non-compliance:			
The cause was identified as contaminated process water used for scrubbing that did not effectively remove the NH ₃ from the flow.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Actions to address absent/failed defences and prevent recurrence of the non-compliance:			
<ul style="list-style-type: none"> • Design and implement a fit for purpose instrument that adequately determines when the NH₃ Still bottom's process water is not of sufficient quality/ contaminated. • Engineer and implement an alternative water source for providing raw/clean scrubbing water to the TGS (Tail Gas Scrubber) and VGS (Vent Gas Scrubber) when the process water is contaminated. • Update TGS and VGS CPV (Critical Process Variable) response plans so they are relevant for all scenarios exceeding licence conditions (i.e; process water contamination). 			

Section E – Details of Non-Compliance with Licence Condition	
<ul style="list-style-type: none"> Ensure secondary emission sources are considered in development of TGS and VGS CPV response plans. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 24 / 09 / 2020
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 24 / 09 / 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 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:	General Manager	Position:	
Date:	18 /12 /2020	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.