



## 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](mailto: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:	L8937/2015/1	Licence file number:	DER2015/002837
Licence holder:	Pilbara Ports Authority		
Trading as:	Pilbara Ports Authority		
ACN:	ABN 94 987 448 870		
Registered address:	The Esplanade, Port Hedland WA 6721		
Reporting period:	01 / 07 / 2019 to 30 / 06 / 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
58	17,306,281 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.	
Prescribed Premises Category	Actual Part 2 Waste Discharge Quantity
N/A	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:	12	Date(s) of non-compliance:	Jun-Dec 2019 Nov 2019, Jan-Feb 2020
---------------	----	----------------------------	---

Details of non-compliance:

The requirement to continuously monitor emissions of particles as PM<sub>10</sub>, with continuous being defined in L8937 as a data recovery rate of at least 90%, was achieved at all three monitoring stations managed by PPA (M5, M6 and M7) when calculating recovery over the 2019/2020 **annual reporting period**.

Non-compliances with the requirement for continuous monitoring at the PPA managed monitors were identified and reported to DWER for two of the **bimonthly reporting periods** during the year. M7 had a data recovery rate of 82.8% during the November to December 2019 reporting period and M6 had a data recovery rate of 83.3% during the January to February 2020 reporting period.

The Taplin Street monitor which is operated by an external party did not achieve continuous monitoring for the financial year with an annual data recovery rate of 48.1%. PPA's bimonthly reports for July to December 2019 previously reported that the data recovery was continuous however after reporting this data PPA was notified that an issue had been identified with the monitor which invalidated data for the period of 1 July 2020 to 31 December 2019 and as such PPA now reports a data recovery rate of 0% for these three reporting periods.

Table 1 presents data capture percentages for each bimonthly reporting period, for both PPA Boundary Monitors (M5, M6 and M7) and Taplin Street. Non-compliant periods are shaded and highlighted in red.

Table 1: FY2019/20 data capture summary – 24-hour average concentration of PM10

Reporting Period	Monitoring Location			
	M5 (Utah North)	M6 (Utah South)	M7 (Utah West)	Taplin Street
Jul-Aug 2019	99.9	99.9	98.2	0.0
Sep-Oct 2019	98.2	100.0	99.9	0.0
Nov-Dec 2019	96.5	100.0	82.8	0.0
Jan-Feb 2020	93.3	83.3	93.2	92.8
Mar-Apr 2020	92.9	100.0	97.9	99.0
May-Jun 2020	98.2	95.0	96.6	98.2
Annual	96.5	96.4	94.8	48.1

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 is suspected of occurring as a result of this non-compliance as:

- The Taplin Street monitor was not used in operational control of dust emissions at the premises for the reporting period and as such data collection from this point would not influence dust management;
- The M5, M6 and M7 monitors are fitted with a Real Time Unit (RTU) in addition to the Beta Attenuation Monitor (BAM) with the RTU being used in operational management of dust emissions. The RTU was functional at M7 when data loss occurred for the BAM

**Section E – Details of Non-Compliance with Licence Condition**

during a period in January 2020 which resulted failure to meet the recovery rate for the January to February reporting period and as such there was no change in operational management of dust emissions; and

- PPA continuously applies dust management strategies to the operation of the premises (i.e. monitoring of product moisture, application of water via stockpile cannons, operation of water carts and application of water to product on conveyor systems) irrespective of dust monitoring results and as such dust management would have been in place during data outages that occurred due to power failures M6 during November 2019 (which impacted both the BAM and the RTU). Further, operations are monitored via CCTV and by field inspections during day to day operations with additional controls applied if fugitive dust emissions are identified.

**Cause (or suspected cause) of non-compliance:**

The reduced capture rate at M7 during the November to December 2019 reporting period was due to a series of intermittent power failures combined with the unit undergoing scheduled annual maintenance in November 2019. The power failures were attributed to the unit's batteries running out due to high-power use by the unit's air intake heater. The air intake heater is used to remove moisture which could otherwise create false positive readings for particles.

The reduced capture rate at M6 during the January to February 2020 reporting period was due to a combination of:

- The data averaging period on the device was incorrectly set during bimonthly servicing which resulted in insufficient data being captured for a period of 6 days between 23 and 28 January 2020; and
- The dust monitoring network was shut down between 7 and 11 February 2020 due to Tropical Cyclone Damien.

During mid 2019 concerns were raised about data accuracy from the Taplin Street monitor when it did not record any days above the 24-hour average interim guideline for PM10 of 70 µg/m<sup>3</sup>. An investigation was commenced by Port Hedland Industries Council (PHIC) which included:

- Manufacturer checks of the instrument which did not find any faults or anomalies; and
- Installation of a parallel monitor to confirm results.

Inconsistencies were identified between the Taplin Street and parallel monitor which resulted in data being invalidated for the period of 1 July 2020 to 31 December 2019.

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

Actions taken to prevent reoccurrence of the non-compliances were:

- The heater set point settings for the M7 monitor were reviewed and adjusted from 45% to 60% humidity which resolved the issue with intermittent power failures;
- The data averaging period on the M6 monitor was corrected which resolved the data loss issues; and
- Replacement monitors were installed at Taplin Street and PHIC reported that investigations confirm that the station is now producing consistent monitoring results.

Ecotech, a specialist contractor, provides PPA's dust monitoring equipment through a rental and service agreement. This includes preventative maintenance, operation and troubleshooting.

PPA conducts regular meetings with Ecotech to facilitate improved dust monitor data capture. The agreement also requires for equipment replacement if required.

Section E – Details of Non-Compliance with Licence Condition	
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: 31 / 01 / 2020, 27 / 3 / 2019





**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:	16	Date(s) of non-compliance:	9 November 2019 23 December 2019 28 April 2020
---------------	----	----------------------------	--

Details of non-compliance:

Biodegradable hydraulic oil was discharged from PPA’s Cavotec Moormaster system at Utah Point berth into harbour waters on three occasions during the Reporting Period. The Cavotec Moormaster system comprises 13 Cavotec units, each with a hydraulically powered vacuum pad that couples with the vessel’s hull to safely moor the vessel to the berth face during ship loading.

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.

PPA considers the environmental impact of these emissions to be negligible, due to:

- The biodegradable nature of the hydraulic oil;
- The limited volumes discharged (the volume discharged in each event was 40L<sup>1</sup> on 9 November 2019, 90L on 23 December 2019, and 10L on 28 April 2020; and
- Large tidal movements and strong currents experienced in Port Hedland causing rapid dispersion and encouraging natural degradation.

Cause (or suspected cause) of non-compliance:

Each of the discharges was due to a failure of a component of the Cavotec units (e.g. valve, O-ring, compression fitting, hardline, or flexible hose).

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

The Cavotec units undergo regular scheduled maintenance in accordance with manufacturer specifications to minimise the risk of component failure, including:

- A weekly online inspection;
- An 8-weekly off-line (shutdown) inspections of the winch assembly, truck assembly and hydraulic power pack, with any issues either rectified immediately or planned in; and
- A 24 weekly lubrication inspections and repairs of the hydraulic power pack.

In late 2019, PPA maintenance completed works to replace the under-berth Cavotec hydraulic hoses with hard-lines during planned site shutdown periods. These additional engineering controls paired with the ongoing maintenance inspection and servicing schedule is expected to reduce the number of spills.

Was this non-compliance previously reported to DWER?

Yes, and

<sup>1</sup> Exceedance was initially reported as 30L, a review of the incident report clarified 40L was discharged to harbour.

Section E – Details of Non-Compliance with Licence Condition	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 29/11/2019, 13/01/2020, 19/05/2020



**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:	16	Date(s) of non-compliance:	29 March 2020
---------------	----	----------------------------	---------------

Details of non-compliance:

Process water potentially containing product residue was discharged from the Utah Point prescribed premises onto adjacent industrial cleared land on one occasion during the reporting period. On this occasion, wash down water overflowed from sump ST7 onto unsealed ground, flowed overland across the PPA boundary onto a BHP road and then back onto PPA's premise.

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.

PPA considers the environmental impact of this event to be negligible, due to:

- The nature of the product (washdown water potentially containing iron ore residue);
- Very low solubility and ecotoxicity of the products which are handled on site (iron ore and manganese);
- The limited volume discharged from the prescribed premises (100L); and
- The receiving environment (sealed and unsealed land areas of land used for bulk ore handling previously cleared of native vegetation).

Cause (or suspected cause) of non-compliance:

The discharge occurred during and following cleaning of Transfer Station 3 (TS03) due to deterioration of a bund along the boundary which was intended to prevent process water emissions.

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

The bund along the PPA / BHP boundary near sump ST7 was repaired as a result of the incident. The bund contains any sump overflows and diverts potential discharge back onto sealed PPA land where water evaporates, and any sediments can be collected with the road sweeper. The bund is now being actively monitored to ensure it is not compromised following ST7 overflow events or following heavy rainfall.

The sump pump and pipes are in the process of being upgraded in 2020/21. This will involve removing redundant piping, increasing pipe diameter, and switching the motors on the sump pumps. This will increase flow between the sumps and is expected to reduce the potential for sump overflows.

In addition, an extension pipe has been installed at TS03, allowing a vacuum truck to vacuum excess product at CV06, reducing water usage and flow through ST7.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

Reported to DWER in writing

Date: 16 / 4 / 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<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> :	[Redacted]		
Name: (printed)	[Redacted]		
Position:	Chief Executive Officer	Position:	
Date:	25/9/2020	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.