

6/04/2022

Director General
Department Administering the *Environmental Protection Act 1986*
Locked Bag 10, JOONDALUP DC, WA 6919

Attention: Chief Executive Officer

LICENCE 9037/2017/1: 2021 ANNUAL COMPLIANCE REPORT

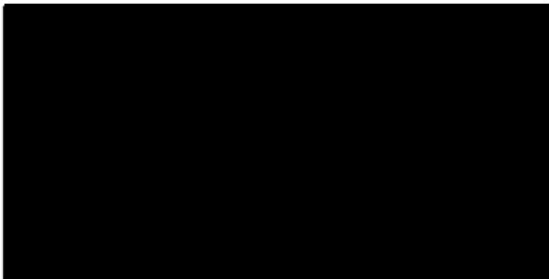
In accordance with Condition 24 of Licence 9037/207/1, Process Minerals International Pty Ltd (PMI) provides the 2021 Annual Compliance Report for the Annual Period 1 January 2021 to 31 December 2021.

As per L9037/2017/1 Definitions, PMI presents the Compliance Report in the form of the Annual Audit Compliance Report Form. Please refer to **Attachment 1** for the Compliance Report and **Attachment 2** for a summary of the Wastewater Treatment Plant (WWTP) water quality limit exceedances.

Please do not hesitate to contact [REDACTED] (Principal Environmental Compliance) on (08) 9315 8796 should you require any additional information.

Yours sincerely

PROCESS MINERALS INTERNATIONAL PTY LTD



ATTACHMENT 1

Annual Audit Compliance Report 2021 (L9037/2017/1)

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

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

Department of Water and Environmental Regulation
 Locked Bag 10
 Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L9037/2017/1	Licence file number:	DER2017/000308
Licence holder name:	Process Minerals International Pty Ltd		
Trading as:	Process Minerals International Pty Ltd		
ACN:	063 988 984		
Registered business address:	1 Sleat Road Applecross, WA 6153		
Reporting period:	01/01/2021 to 31/12/2021		

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)
<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 in 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
Category 5: Processing or beneficiation of metallic and non-metallic ore	2,323,085 tonnes
Category 57: Used tyre storage	165 used tyres (60 HV tyres and 105 LV tyres)
Category 64: Class II putrescible landfill	288.33 tonnes
Category 73: Bulk storage of chemicals	LNG = 394 kL Tank farm A (4 x 49.25 kL tanks) Tank farm B (3 x 49.25 kL tanks) Diesel = 554 kL New fuel farm (3 x 110,000 L tanks) Old fuel farm (3 x 57,000 L +1 x 53,000 L tanks)
Category 85: Sewage facility	Daily average = 40.79m ³ /per day
Category 6: Dewatering	14700 tonnes (0.0147 GL)
Category 85B: Water desalination plant	0.35 gegalitres (354,608 m ³)

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 and non-metallic ore	690,128 tonnes to the tailings storage facility 1,093,732 tonnes to the coarse reject load out
Category 6: Dewatering	14700 tonnes (0.0147 GL)
Category 85B: Water desalination plant	0.31 gegalitres (305,193 m ³) (discharged to Ghost Crab Pit)

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 Table 2 Condition 7	Date(s) of non-compliance:	11/02/2021, 22/09/2021 07/09/2021, 05/10/2021 28/10/2021, 29/11/2021 14/12/2021
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Details of non-compliance:

Wastewater effluent discharged to the irrigation area exceeded the Treated Effluent Quality Limits prescribed in the Licence in February, September, October, November and December. Details are provided in Attachment 2.

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.

The impact of this non-compliance is considered to be negligible due to the following:

- All treated wastewater is discharged into the approved spray field facility.
- Inspections of the WWTP and spray field during the reporting period did not identify any impacts to vegetation.

Cause (or suspected cause) of non-compliance:

- Low sucrose levels in the system has been identified as a potential cause of elevated Total Nitrogen.
- Low levels of poly-aluminium chloride has been identified as a potential cause of elevated Total Suspended Solids.
- Elevated levels of BOD were likely a result of increased microbial load in the system due to additional sucrose dosing.

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

Actions undertaken to mitigate impacts and prevent non-compliance:

- A third-party wastewater specialist has been engaged to review monitoring data associated with the WWTP and provide technical advice regarding system adjustments on an ongoing basis.
- Any elevated Total Nitrogen level will be managed by increased sucrose dosing. Any elevated Total Suspended Solids will be managed by increased dosing of poly-aluminium. Any elevated BOD levels will be managed by increased chlorine dosing.
- Ongoing inspections of the spray field to ensure that any potential impacts to vegetation are identified early and, if required, mitigation measures will be implemented. As noted above, inspections of the WWTP and spray field during the reporting period did not identify any impacts to vegetation.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

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:	Condition 22d	Date(s) of non-compliance:	January – December 2021
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Details of non-compliance:

A total of 45 landfill inspections were recorded during the reporting period (January – December 2021). Inspections records were not available for weeks 5, 6, 8, 11, 12, 13, 14, 15, 19, 21, 29.

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 was no actual or suspected environmental impact associated with this non-compliance. The landfill was managed in accordance with the Licence conditions and MRL internal procedures for the duration of the reporting period.

Cause (or suspected cause) of non-compliance:

Not all inspections were recorded in the MRL INX inspection management system.

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

Appropriate record keeping was raised with the site team. Weekly inspections are scheduled, with monthly checks to confirm they have been complete and appropriate records entered into INX InControl.

Was this non-compliance previously reported to DWER?

Yes, and

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

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)		Name: (printed)	
Position:		Position:	
Date:		6/04/2022	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.

ATTACHMENT 2

WWTP Effluent Limit Exceedances

Sample Date	MPL Lab Report Reference	Analyte Exceeded	Analyte Limit	Analyte Result
11/02/2021	257022	Total Suspended Solids	≤ 40 mg/L	41 mg/L
22/09/2021	269447	BOD	≤ 30 mg/L	86 mg/L
		Total Nitrogen	≤ 50 mg/L	72 mg/L
07/09/2021	268459	BOD	≤ 30 mg/L	32 mg/L
05/10/2021	269988	Total Suspended Solids	≤ 40 mg/L	58 mg/L
		Total Nitrogen	≤ 50 mg/L	66 mg/L
28/10/2021	271344	Total Suspended Solids	≤ 40 mg/L	42 mg/L
		Total Nitrogen	≤ 50 mg/L	61 mg/L
29/11/2021	273181	BOD	≤ 30 mg/L	110 mg/L
		Total Nitrogen	≤ 50 mg/L	90 mg/L
14/12/2021	273998	BOD	≤ 30 mg/L	72 mg/L