

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:	063 988 894		
Registered business address:	1 Sleat Road APPLECROSS WA 6153		
Reporting period:	01/01/2019 to 31/12/2019		

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	2,536,921 tonnes
Category 57: Used tyre storage	225 tyres – Refer to Section E
Category 64: Class II putrescible landfill	380.642 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)

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 85: Sewage facility	Daily average = 36.43 m ³ /day
Category 6: Dewatering	0 tonnes (0 giga litres)
Category 85B: Water desalination plant	0.476 giga litres

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	1,110,38 tonnes to the tailings storage facility 75,228 tonnes to the coarse reject load out
Category 6: Dewatering	0 tonnes (0 giga litres)
Category 85B: Water desalination plant	0.476 giga litres

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:	Schedule 2: Primary Activities Category 57 Used tyre storage	Date(s) of non-compliance:	January, February, May – September, November, December
Details of non-compliance:			
During the reporting period (January, February, May – September, November, December) records for the disposal of used to the Mt Marion Waste Rock Landform were not retained. Subsequently, the operation is unable to confirm the number of used tyres disposed of during this 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.			
The impact of this non-compliance is considered Low. All tyres disposed of to the existing tyre dump are disposed of in accordance with the MRL Waste Management Procedure (MRL-EN-PRO-0011). The tyre dump is located within an existing waste rock landform. No complaints or hazards were received for the facility during the reporting period.			
Cause (or suspected cause) of non-compliance:			
There have been significant personnel changes during the 2019 period within the workshop, mining and environmental teams, which has resulted poor handover of information with regards to reporting and managing used tyres onsite.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Asset Management Group (AMG) and site Mining team are now responsible for ensuring that used tyres are managed in accordance with the site procedure, which includes the recording of used tyre movements on a monthly basis.			
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			
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:	Schedule 2: Primary Activities Category 85 Sewage facility premises production or design capacity of 35 m ³ /day	Date(s) of non-compliance:	January, February, March, April, May 2019
Details of non-compliance:			
During the January - May 2019 period, a number of events were recorded where the daily treated effluent volume discharged to the spray field exceeded the approved 35 m ³ /day limit. The exceedances recorded ranged from 35.09 m ³ /day to 58.40 m ³ /day.			
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.			
<p>Whilst exceedances during the 6 month period of the daily limit value, the recorded average for the reporting period was 33.78 m³/day, which was below the approved category capacity limit of 35 m³/day.</p> <p>The impact of this non-compliance is considered low, as all treated waste water was discharged to the approved vegetated spray field facility.</p> <p>Formal inspection of this facility in March 2019 (by the Site Environmental Advisor) identified no pooling, excess odour and or leachate at the facility.</p> <p>No complaints or hazards were received for the facility during the reporting period.</p> <p>The WWTP and spray field are located as per Figure 1 of L9037/2017/1.</p>			
Cause (or suspected cause) of non-compliance:			
The repeat non-compliances between January and May 2019 were due to an increased number of personnel at the Project, which triggered a Licence amendment submission (October 2017) and eventual upgrade of the system to increase throughput capacity.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
There were no adverse impacts to the environment as a result of this non-compliance.			
<p>The amendment for Category 85 was submitted to DWER in October 2017 with grant of the amendment received on 31 May 2019.</p> <p>There were no exceedances recorded between 1 June 2019 and 31 December 2019 after the Category 85 was successfully increased to 70 m³/day.</p>			
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			
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:	3	Date(s) of non-compliance:	28 June 2019
Details of non-compliance:			
Compliance report was submitted after the 60 day requirement of Condition 5.			
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.			
Environmental impact of the non-compliance considered nil. The non-compliance was administrative.			
Cause (or suspected cause) of non-compliance:			
The compliance report was not submitted within the 60 day period, as the WWTP system was not consistently producing effluent compliant with the Licence Limits and therefore, failed produce three (3) consecutive compliant results.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Future compliance reports will submitted on construction of infrastructure as per timing stipulated in the approval. Should a delay in submission of the compliance report be required (ie. due to non-compliant results), DWER will be notified prior to the granted submission due date.			
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			
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:	7	Date(s) of non-compliance:	28/02/2019, 13/05/2019, 22/05/2019, 28/05/2019, 20/06/2019, 24/06/2019, 25/06/2019, 04/07/2019, 17/07/2019, 19/08/2019, 16/09/2019, 26/09/2019, 15/10/2019, 28/10/2019, 21/11/2019, 05/12/2019
Details of non-compliance:			
Effluent quality testing during the reporting period identified an number of events that exceeded the Treated Effluent Quality Limits, as described in Table 6 of the Licence.			
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 minor, as all treated waste water was discharged to the approved spray field facility. Formal inspection of this facility in March 2019 (by the Site Environmental Advisor) identified no pooling, excess odour and/ or leachate at the facility. No complaints or hazards were received during the reporting period. The WWTP and spray field are located as per Figure 1 of L9037/2017/1.			
Cause (or suspected cause) of non-compliance:			
The WWTP system has experienced a number of failures during the reporting period due to sudden increases in camp numbers and blockages. This has resulted in non-compliant effluent results. Due to the design of the system, it requires an extended period of time to re-stabilize after an issue (eg. Increase in camp numbers, blockages) and provide compliant results.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Prior to the reporting period in December 2018, a filtration system was installed to assist with blockages and non-organic solids entering the WWTP system. During the reporting period the filtration system improved water quality (Q1), however water quality deteriorated. A project was initiated to install a Pre-processing Spiral Filtration unit to improve the separation of solids and non-organics from the system and improve the ability of the WWTP to treat waste water. This unit was installed in January 2020. MRL have engaged a waste water specialist to regularly inspect and maintain the system. The specialist has also recommended upgrades and additional works that are required at the unit.			
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			
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:	10	Date(s) of non-compliance:	19 September 2019 – 30 December 2019
Details of non-compliance:			
<p>RO Brine water was discharged into the Mining Turkeys Nest during the reporting period. Water from this turkeys nest is used for dust suppression.</p> <p>The amendment granted in September 2019 included Condition 10, which specified RO Brine shall not be used for dust suppression. This Condition was introduced due to concerns raised by DWER in terms of recorded concentrations of uranium in both pit water and RO Brine.</p>			
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.			
<p>Actual environmental impact is considered Low.</p> <p>As the Project’s mine water is classified as saline, site operational procedures are in place to effectively manage dust suppression activities within operational areas and associated risks, including the potential impact of overspray on adjacent vegetation.</p> <p>To date, there have been no reported or identified vegetation impacts due to dust suppression activities, including over spray.</p>			
Cause (or suspected cause) of non-compliance:			
At the time of the amendment, communication of the introduction of Condition 10 was not effectively undertaken across the site’s operational teams			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The non-compliance was identified in January 2020. Both the Mining and Processing teams were immediately notified and actions were put into place to redirect the RO Brine water into the tailings facility and/or for re-use in the Processing Plant.</p> <p>A water sample was taken from the turkeys nest in January to be tested for radiological parameters and Total dissolver metals. Full radiological report is due April 2020.</p>			
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			
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:	Weekly inspections: Week 1-8, 22, 50–52 Correct Wastes: Week 17, 20 and 46 Weekly maintenance: Week 9, 14-15 and 17-19
Details of non-compliance:			
Formal documented weekly inspection were not conducted between Week 1-8, 22 and 50-51. During weekly inspections, incorrect wastes, such as a small number of pallets, were identified in the landfill trench during Week 17, 20 and 46. During weekly inspections, it was identified that maintenance works had not yet been completed for that week during Week 9, 14-15 and 17-19.			
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.			
Actual environmental impact is considered Low. The landfill is located on top of a waste dump, therefore limiting the source-pathway-receptor impact from waste (eg. Seepage) on the receiving environment (eg. Vegetation).			
Cause (or suspected cause) of non-compliance:			
Formal documented weekly inspections were missed multiple times throughout the reporting period due to staff turnover. Incorrect wastes were removed prior to landfill trenches being compacted and covered. Maintenance works are conducted each week. However, they can be delayed until after the inspection due to issues and/or availability with mining equipment.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Mining management team has been engaged to complete onsite inspections and to take photographs on a weekly basis. These are then sent to the wider Environment team to ensure Licence conditions are met and formal inspections are documented.			
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 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 – Environment, Project Services	Position:	
Date:	27 March 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.