



1st September 2016

Our Reference: 200-200-LET-EPA-0009

Your Reference: 2013-0000239827:ST02-2013-004

Mark Rust
Senior Environmental Officer
Office of the Environmental Protection Authority
Locked Bag 10
East Perth WA 6892

Email: mark.rust@epa.wa.gov.au

Dear Mark,

Subject: Report to OEPA for Groundwater Monitoring Results as per Condition 8 of Ministerial Statement No. 870

This letter to inform the OEPA on the outcomes of the latest groundwater monitoring undertaken by Yara Pilbara Nitrates Pty Ltd (YPNPL) at the Technical Ammonium Nitrate Production Facility (TANPF) as required by Conditions 8-4 and 8-5 of Ministerial Statement 870.

Condition 8-4 The proponent shall sample/monitor all groundwater bores required by Condition 8-3 every six months and shall set groundwater monitoring trigger values at a value of 10% above the baseline contaminant concentrations obtained from the hydrogeological studies required by condition 8-1.

Condition 8-5 In the event that monitoring required by condition 8-4 indicates an exceedance of trigger levels: 1. The proponent shall report such findings to the CEO within 7 days of the exceedance being identified; 2. The proponent shall provide evidence which allows determination of the cause of the exceedance; 3. If determined by the CEO to be project attributable, the proponent shall submit actions to be taken to address the exceedance within 7 days of the determination being made to the CEO; 4. The proponent shall implement actions to address the exceedance and shall continue until such time as the CEO determines that the remedial actions may cease; and 5. The proponent shall submit bi-annually, or at a frequency defined to the satisfaction of the CEO, the results of monitoring required by condition 8-4 to the CEO, until such time as the CEO determines that reporting may cease.

Yara Pilbara Nitrates Pty Ltd

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YPNPL has reported results to OEPA of previous monitoring regularly (most recently in December 2015), as ongoing monitoring continues to show substantial variation that are considered to be reflective of a natural variability rather than a result of site related potential contamination sources as a result of ongoing construction activities. Since the last report to OEPA in December 2015 progress in commissioning of the TANPF has been significantly slower than anticipated and the plant is yet to be fully commissioned.

Groundwater sampling was undertaken in June 2016, with resampling undertaken in August 2016 to check the representativeness of some results from the June sampling event. Due to limitations in sampling equipment, site MW04 was unable to be sampled. This is being addressed through the acquisition of new sampling equipment that will enable sampling of this bore. MW04 will be sampled at the next monitoring event.

In June 2016 a number of analytes were detected at concentrations slightly above trigger values. When these were retested in August 2016 one (1) analyte at one (1) well, MW02, was found to exceed the trigger value of Total Nitrogen.

The Total Nitrogen value at MW2 of 13,000 µg/L has exceeded the trigger value of 5,610µg/L. As previously reported, this was also exceeded in November 2015 (6,840µg/L). YPNPL has initiated an investigation to understand the cause of this elevated Nitrogen value. Results from this investigation will be submitted to the OEPA once it is complete.

Attached to this letter is a summary table showing the 2016 groundwater monitoring results as well as the historical monitoring data, to enable a review of the variability of the parameters over time since 2011.

If you have any queries please do not hesitate to contact Susan Giles, Environmental Superintendent on 9183 4167 or susan.giles@yara.com.

Yours sincerely

A handwritten signature in blue ink, appearing to read "B. Howarth".

Brian HOWARTH

HESQ Manager

Yara Pilbara Nitrates

Attachments

1. TANP Groundwater monitoring results

