



# TAN BURRUP PROJECT

## Compliance Assessment Report (MS 870)

### REVISION CONTROL PAGE

#### MAIN DOCUMENT

<u>REV.</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>COMMENTS</u>
00	24 Sep. 2012	Issue for Approval	
01	18 Sep 2013	Issue for Approval	
02	23 Sep 2014	Issue for Approval	

#### ATTACHMENTS

<u>DOCUMENT CODE</u>	<u>DESCRIPTION</u>	<u>REV.</u>
2-250-329-REP-TRE-8001-Att01	TANPF's footprint. Work permit for clearing activities.	01
2-250-329-REP-TRE-8001-Att02	Main access, Fence	01
2-250-329-REP-TRE-8001-Att03	Project execution schedule	01
2-250-329-REP-TRE-8001-Att04	Tan Burrup's Site induction	00
2-250-329-REP-TRE-8001-Att05	Air Quality Monitoring locations	01
2-250-329-REP-TRE-8001-Att06	Monitoring on PM10 at site boundary	01
2-250-329-REP-TRE-8001-Att07	Monitoring on dust deposition at site boundary	01
2-250-329-REP-TRE-8001-Att08	Certificate for weather station	00
2-250-329-REP-TRE-8001-Att09	Weather measurement (wind speed / direction, temperature and rainfall).	01
2-250-329-REP-TRE-8001-Att010	Monitoring on PM10 at Rock Art site	01
2-250-329-REP-TRE-8001-Att011	Water inventory for dust suppression	01
2-250-329-REP-TRE-8001-Att012	Pictures air quality monitoring equipment at site boundary	01
2-250-329-REP-TRE-8001-Att013	Pictures air quality monitoring equipment at rock art	00
2-250-329-REP-TRE-8001-Att014	Weed Mapping report	01
2-250-329-REP-TRE-8001-Att015	Vehicle/Plant & Mobile Equipment Access Form. Vehicle Hygiene and Weed inspection Form	00
2-250-329-REP-TRE-8001-Att016	Licenses 17 Training certificates.	01
2-250-329-REP-TRE-8001-Att017	Fauna Catalogues. Habitat Report.	01
2-250-329-REP-TRE-8001-Att018	Site Clearing report.	01
2-250-329-REP-TRE-8001-Att019	Fauna shelter.	01
2-250-329-REP-TRE-8001-Att020	Groundwater Monitoring well re-location	01



2-250-329-REP-TRE-8001-Att021	Ground Monitoring Wells Final Locations	00
2-250-329-REP-TRE-8001-Att022	New Groundwater wells to replace MW1 and MW4	01
2-250-329-REP-TRE-8001-Att023	Groundwater Quality Monitoring	01
2-250-329-REP-TRE-8001-Att024	Decommissioning Environmental Management plan	00

## TEMPLATES

<u>DOCUMENT CODE</u>	<u>DESCRIPTION</u>	<u>REV.</u>
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PREPARED:	APPROVED:	COMPANY APPROVED:
R. del Campo	A. López	E. Storms

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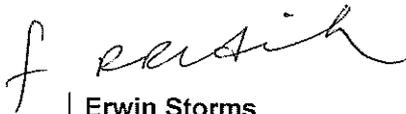
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**Corporate Endorsement**

*Yara Pilbara Nitrates Pty Ltd (YPNPL) is pleased to submit this Compliance Assessment Report as per condition 4.6 of Ministerial Statement 870 (MS 870). I hereby certify to the best of my knowledge, the information within this Compliance Assessment Report is true and correct.*



**Erwin Storms**  
**Project Director**  
**Yara International**

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## 1. PURPOSE

The purpose of the Compliance Assessment Report (CAR) is to annually assess compliance with all conditions of the MS 870 dated on 7 July 2011 as per conditions 4-3, 4-4 and 4-6 of MS 870:

*“4-3 The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.*

*4-4 The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.*

*4-6 The proponent shall submit to the CEO the first compliance assessment report fifteen months from the date of issue of this Statement addressing the twelve month period from the date of issue of this Statement and then annually from the date of submission of the first compliance report. The compliance assessment report shall:*

- 1. be endorsed by the proponent’s Managing Director or a person delegated to sign on the Managing Director’s behalf;*
- 2. include a statement as to whether the proponent has complied with the conditions;*
- 3. identify all potential non-compliances and describe corrective and preventative actions taken;*
- 4. be made publicly available in accordance with the approved compliance assessment plan; and*
- 5. indicate any proposed changes to the compliance assessment plan required by condition 4-1.”*

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## 2. SCOPE

This CAR (hereinafter referred as “CAR 2014”) applies to the PROJECT proposed by Burrup Nitrates Pty Ltd (YPNPL) to construct and operate a Technical Ammonium Nitrate Production Facility (TANPF) located on Site D within the King Bay/Hearson Cove Industrial Estate on the Burrup Peninsula (WA). TANPF is located approximately 13 kilometer (km) north-west of Karratha.

Implementation of the proposal is subjected to the conditions of MS 870 (including Schedule 1).

The PROPONENT (YPNPL) must ensure implementation of MS 870 conditions for the reporting period from October 2013 to October 2014 by means of this annual CAR 2014 in accordance to the Compliance Assessment Plan (CAP).

The CAR 2014 shall be submitted to the Office of Environmental Protection Authority (OEPA) on the 10th of October 2014 (deadline).

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### 3. DEFINITIONS

<b>PROPONENT / COMPANY:</b>	Yara Pilbara Nitrates Pty Ltd (YPNPL).
<b>PROPOSAL / PROJECT:</b>	TAN Burrup Project.
<b>EPC LSTK CONTRACTOR:</b>	Técnicas Reunidas S.A. (TR).
<b>YPFPL:</b>	YARA Pilbara Fertilizers Pty Ltd.
<b>YPNPL:</b>	YARA Pilbara Nitrates Pty Ltd.
<b>C:</b>	Compliant.
<b>CLD:</b>	Completed.
<b>CAP:</b>	Compliance Assessment Plan.
<b>CAR:</b>	Compliance Assessment Report.
<b>CEO:</b>	Chief Executive Officer (of the OEPA).
<b>EPBC Act:</b>	Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act 1999.
<b>DEC:</b>	Department of Environment and Conservation.
<b>DIA:</b>	Department of Indigenous Affairs.
<b>DMP:</b>	Department of Mining and Petroleum.
<b>EPA:</b>	Environmental Protection Authority.
<b>EP Act:</b>	WA Environmental Protection Act, 1986.
<b>EPC:</b>	Engineering, Procurement and Construction.
<b>ERM:</b>	Environmental Resources Management
<b>DoH:</b>	Department of Health.
<b>DoW:</b>	Department of Water.
<b>IP:</b>	In Process.
<b>LSTK:</b>	Lump Sum Turn Key.
<b>MS:</b>	Ministerial Statement.
<b>NA:</b>	Not audited.
<b>NC:</b>	Non-compliant.
<b>NR:</b>	Not Required at this stage.
<b>OEPA:</b>	Office of Environmental Protection Authority.
<b>PER:</b>	Public Environmental Review.
<b>TAN:</b>	Technical Ammonium Nitrate.
<b>TANPF:</b>	Technical Ammonium Nitrate Production Facility.
<b>SEWPaC:</b>	Australian Government Department of Sustainability, Environment, Water, Population and Communities
<b>WA:</b>	Western Australia.
<b>VR:</b>	Verification Required.

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#### **4. COMPLIANCE ASSESSMENT REPORT (CAR) REQUIREMENTS**

##### **4.1 Compliance Reporting**

The annual Compliance Assessment Report (CAR) assesses the compliance with conditions for MS 870 dated on 7 July 2011 in accordance with the Compliance Assessment Plan (CAP), approved on 23 August 2012.

This report complies with the compliance reporting requirements of condition 4.3 of MS 870.

##### **4.2 CAR Submission**

The PROPONENT (YPNPL) shall submit to the OEPA the first compliance assessment report fifteen months from the date of issue of the MS 870 in July 2011 and then annually from the date of submission of the first compliance report.

The first annual CAR was required to be submitted to OEPA in 10<sup>th</sup> of October 2012 (CAR 2012) covering fifteen months from the date of approval. Subsequent reports are being submitted annually by October.

The second annual CAR 2013 was submitted to OEPA by November 2013 although it was prepared in September 2013.

This third annual CAR 2014 is foreseen to be submitted to OEPA by October 2014.

##### **4.3 CAR Endorsement**

This CAR 2014 has been endorsed by Erwin Storms, PROJECT Director.

##### **4.4 Statement of Compliance**

Assessment of the PROJECT's progress against the CAP demonstrates that YPNPL is compliant with all conditions applicable to the current stage of development for the project.

Current design and construction works on site are all compliant with MS 870 as assessed and reported in Car 2014 Section 5, Audit Table.

##### **4.5 CAR Public Availability**

This CAR 2014 is to be placed on the PROPONENT website or an equivalent website for the life of the PROJECT. The PROPONENT website is available through the following link:

**<http://www.ypnpl.com.au/project-updates.html>**

A URL link to each report uploaded will be sent to the Compliance Branch through the [compliance@epa.wa.gov.au](mailto:compliance@epa.wa.gov.au) email address.

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## 4.6 CAP Changes

There have been no changes to the CAP during this reporting period.

## 4.7 Non-Compliances and Corrective and Preventive Actions

### 4.7.1 TAN BURRUP CAR (MS 870) 2013

#### 4.7.1.1 Groundwater Monitoring

The annual CAR 2013 advised that groundwater monitoring (October 2013, March 2013 and April 2013) groundwater trigger levels exceedances could have been occurred due to site levelling activities, areas of ground & soils not previously exposed to rainfall and leaching of these soils releasing metals in some localised groundwater areas". Nevertheless, it was also concluded that trigger level concentrations need to be revaluated to account for natural variability. Refer to CAR 2013 for further information.

#### 4.7.1.2 OEPA's Desktop Audit

Each year the Office of the Environmental Protection Authority (OEPA) undertakes a proactive audit programme on a selected number of Ministerial Statements. As part of the programme, the OEPA selected TANPF to undertake a desktop audit to determine the compliance status of the implementation conditions. As a result of the Desktop Audit Report, further information (before the 20<sup>th</sup> of September) and/or on site verification was required to verify compliance status ("verification required") with the following:

- 870:M1.1 - Proposal Implementation
- 870:M5.2 - Air Quality
- 870:M6.2 - Rehabilitation
- 870:M7.2 - Fauna
- 870:M8.2 – Groundwater
- 870:M8.3 - Groundwater
- 870:M8.6 - Groundwater
- 870:M9.2 - Acid Sulphate Soils
- 870:M10.1 – Decommissioning

Refer to OEPA's Letter "NOTICE OF Desktop Audit of Statement 870, reference: CA01-2013-0018", dated on 19 August 2013.

YPNPL submitted to the OEPA the information requested (before the 20<sup>th</sup> of September) to support the implementation of the above listed conditions with status "verification required".

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Refer to YPNPL's letter "Reply on OEPA Letter's NOTICE OF DESKTOP AUDIT OF STATEMENT 870 – YPNPL, reference CA01-2013-0018 dated 19th August", dated 18 Sep 2013".

#### **4.7.2 TAN BURRUP CAR (MS 870) 2014 (current version)**

##### 4.7.2.1 Groundwater Monitoring

Groundwater monitoring was carried out in October 2013 and April 2014, every 6 months as per Condition 870:M8.4.

YPNPL reported to OEPA the groundwater trigger levels exceedences identified in the October 2013 GMR by November 2013 and the exceedance identified in April 2014 by May 2014, within seven days of the exceedences being identified.

The results continue to support the notion that variability in the groundwater chemistry observed between monitoring wells and between monitoring events has no clear trends and that none of the analytes observed exceeding the trigger levels are directly attributed to current on site activities. Refer to CAR 2014 Att23.

##### 4.7.2.2 OEPA's On Site Audit

As a result of the OEPA's desktop audit referred in Section 4.1.7.2 above, MS 870 conditions were required by to be verified on site by OEPA's Authorised Officers and Inspectors on the 22nd of October 2013. The on site audit scope included the verification of proper implementation of the following: Ambient Air Quality Monitoring Programme, Rehabilitation, Fauna Management, Dewatering measures, Groundwater monitoring and Acid Sulphate Soil management. Refer to OEPA's Notification "Verification Site Inspection Scope - Ammonia Nitrate Facility- MS870 - 22 October 2013".

The OEPAS's on site audit concluded under OEPA's Letter: "The Resolutions of non compliance report", dated on 15 January 2014 that the conditions which were not complied with (status "non compliance") are the following:

- Confirmation that at least two fauna-clearing appropriated licenced by Department of Parks and Wildlife to remove fauna from the trenches and other construction related voids as required by Condition 7-2.2.
- Details of the design, construction and location of the bores installed to replace groundwater monitoring bores MW1 and MW4 and reasons and rationale for replacing bores.

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- A report that provides exceedences of groundwater trigger levels and details to support the report's conclusions as required by Condition 8-5.2.

YPNPL submitted the required information to demonstrate OEPA a proper implementation of above conditions with status "non compliance" on 14 February 2014 YPNPL's Letter Reference: YP250-500-LET-EPA-0005) and OEPA determined the issue resolved on 14 March 2014 (OEPA's Letter Reference: 2014.0000631365).

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

### 5. MS 870 COMPLIANCE ASSESSMENT - AUDIT TABLE 1

**Note:**

- Phases that apply in this table = Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases).
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition, P = Proponent's commitment.
- Any elements with status "Audited by proponent only" are legally binding but are not required to be addressed specifically in compliance reports, if complied with.
- Acronyms list: CAP = Compliance Assessment Plan; CAR = Compliance Assessment Report, CEO = Chief Executive Officer of OEPA; DEC = Department of Environment and Conservation; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; EPA = Environmental Protection Authority; DoH = Department of Health; DoW = Department of Water, Minister for Env = Minister for the Environment Environmental Protection Act 1986; MINISTER: Minister for the Environment Protection and Biodiversity Conservation (EPBC) Act 1999, OEPA = Office of the Environmental Protection Authority, WA: Western Australia.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage. Please note the terms VR = Verification Required and IP = In Process are only for OEPA use.

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M1.1	Proposal Implementation	The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	Implement the proposal according with Schedule 1 of Statement No. 870, including the key proposal characteristics.	CAR.	Min for Env		Overall	Ongoing	<p>Proposal has already been commenced.</p> <p>Engineering/ Design phase has been completed (100%). Site Works started on November 2012. Current Site Works progress achieved is 62.63 % (12/09/2014).</p> <p>- Proposal implementation as per Schedule 1 , refer below to CAR 2014, Section 6 "Key Characteristics Table (Table 2)".</p> <p>- The total area disturbed is 35 ha for the PROJECT including temporary construction facilities and laydown.</p> <p>- Single access to the TAN Burrup site.</p> <p>- No Heritage Permit Approval has been required to be raised to YPNPL as works are limited within the site fence.</p> <p>- Signs are installed at the entrance to the Project Area and also along the fence, with intervals no less than 50m. The signs state that no construction and operation staffs are permitted to enter areas surrounding the Project.</p> <p>For further information refer to:            CAR 1014 Att01.TAN Burrup Project's footprint.            CAR 1014 Att02.Main access, Fence.            CAR 1014 Att03.Project execution schedule.            CAR 1014 Att04 Tan Burrup's Site induction.</p>	C
870:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for Environment under sections 38(6) or 38(7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposal	Notify in writing a letter that provides details of the name and address of the new proponent.	Proponent details as listed on MS 870.	Min for Env		Overall	Ongoing	<p>Burrup Nitrates Pty Ltd notified the OEPA on 15 November 2012 that the company had changed its name to Yara Pilbara Nitrates Pty Ltd (YPNPL). The OEPA acknowledged the change of name in a letter dated 17 December 2012 (OEPA ref. A572598).</p>	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the Chief Executive Officer of the Office of the Environmental Protection Authority (CEO) of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Notify in writing.	Letter of notification.	CEO		Overall	Within 30 days of such change	The proponent contact details are YPNPL (CAN 127 391 422) Level 5, 185 St Georges Terrace, Perth, WA 6000.	NR
870:M3.1	Time Limit of Authorisation	The authorization to implement the proposal provided for in this statement shall lapse and be void five years after the date of this statement if the proposal to which this statement relates is not substantially commenced	Notify in writing.	Letter of notification.	CEO		Overall	Before 7 July 2016	Statement 870 was issued on 11 July 2011. PROJECT has already commenced. Authorisation to implement the proposal will lapse on 11 July 2016. Refer to 870:M1.1 above.	C
870:M3.2	Time Limit of Authorisation	The proponent shall provide the CEO with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Notify in writing.	Letter of notification.	CEO		Overall	Before 7 July 2016	Statement 870 was issued on 11 July 2011. PROJECT has already commenced. Authorisation to implement the proposal will lapse on 11 July 2016. Refer to 870:M1.1 above.	C
870:M4.1	Compliance Reporting	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the CEO.	Prepare and maintain a CAP and an audit table in accordance with the 'Post Assessment Guideline for Preparing an Audit Table'. Written Correspondence.	Approved CAP. Approved Audit Table- A copy of Correspondence to CEO.	CEO		Overall	Ongoing	TANPF CAP was submitted on 9 August 2012 (OEPA ref. A533490). The OEPA approved the CAP in a letter dated 23 August 2012 (OEPA ref. A53844).	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M4.2	Compliance Reporting	The proponent shall submit to the CEO the compliance assessment plan required by condition 4-1 at least 6 months prior to the first compliance report required by condition 4-6, or prior to implementation, whichever is sooner. The compliance assessment plan shall indicate: 1. the frequency of compliance reporting; 2. the approach and timing of compliance assessments; 3. the retention of compliance assessments; 4. the method of reporting of potential non-compliances and corrective actions taken; 5. the table of contents of compliance assessment reports; and 6. public availability of compliance assessment reports.	Submit the CAP to CEO.  The CAP includes: 1. frequency of CAR, 2. approach and timing, 3. retention, methods of non-compliances and corrective actions reporting, 5. Table of contents of CAR and 6. Public availability of CAR.	Approved CAP.  A copy of Correspondence to CEO.  Available on proponent's website.	CEO		Pre-construction	Six (6) months prior to the first CAR by condition 4-6 (by 8 April 2012) or prior to implementation, whichever is sooner	YPNPL submitted the TANPF CAP to the OEPA on 9 August 2012 (OEPA ref. A533490). The OEPA approved the CAP in a letter dated 23 August 2012 (OEPA ref. A53844).	CLD
870:M4.3	Compliance Reporting	The proponent shall assess compliance with conditions in accordance with the compliance assessment plan required by condition 4-1.	Undertake assessment according to the approved CAP.	CAR.	Min of Env		Overall	CAR annually by 8 October	TANPF CAR 2012 submitted to OEPA on 10 October 2012 (OEPA ref. A555982) and available at <a href="http://www.ypnpl.com.au/project-updates.html">http://www.ypnpl.com.au/project-updates.html</a> , indicates the proponent assessed compliance in accordance with the approved CAP.  The TANPF CAR 2013 submitted to OEPA on 13 November 2013 and available at <a href="http://www.ypnpl.com.au/project-updates.html">http://www.ypnpl.com.au/project-updates.html</a> , indicates the proponent assessed compliance in accordance with the approved CAP.  The current TANPF CAR 2014 to be submitted to OEPA by October and to be made available at <a href="http://www.ypnpl.com.au/project-updates.html">http://www.ypnpl.com.au/project-updates.html</a> , indicates the proponent assessed compliance in accordance with the approved CAP.	C
870:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the compliance assessment plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Retain electronic and hardcopies of Compliance Assessment Reports for the life of the PROJECT, maintained as per PROPOSAL's Document Control Management System requirements being retrieved if required.	CAR and records availability at the request of CEO	CEO		Overall	When required by CEO	CAR 2012 (OEPA ref. A555982) states that compliance reports are to be retained on the YPNPL PROJECT files and made available upon request.  CAR 2013 states that compliance reports are to be retained on the YPNPL PROJECT files and made available upon request.  Current CAR 2014 states that compliance reports are to be retained on the YPNPL PROJECT files and made available upon request.	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance within seven days of that non-compliance being known.	Notify in writing.	A copy of Correspondence to CEO.	CEO		Overall	Within 7 days of non-compliance being known	CAR 2012 (OEPA reference 555982) states that no potential non-compliances were identified during the reported period. CAR 2013 states under Section 4.7 "Non-Compliances and Corrective and Preventive Actions", the non-compliance found during the reported period. Current CAR 2014 states under this Section 4.7 "Non-Compliances and Corrective and Preventive Actions", the non-compliance found during the reported period. YPNPL reported to OEPA the exceedences identified in the October 2013 Ground Monitoring Report (GMR) by November 2013 and the exceedance identified in April 2014 by May 2014, within seven days of the exceedences being identified.	C
870:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first compliance assessment report fifteen months from the date of issue of this Statement addressing the twelve month period from the date of issue of this Statement and then annually from the date of submission of the first compliance report. The compliance assessment report shall: 1. be endorsed by the proponent's Managing Director or a person delegated to sign on the Managing Director's behalf; 2. include a statement as to whether the proponent has complied with the conditions; 3. identify all potential non-compliances and describe corrective and preventative actions taken; 4. be made publicly available in accordance with the approved compliance assessment plan; and 5. indicate any proposed changes to the compliance assessment plan required by condition 4-1.	Submit the CAR to CEO in accordance with CAP.  The CAR shall: 1. be endorsed by the proponent's Managing Director or a person delegated; 2. include a statement of compliance with conditions; 3. identify all potential non-compliances and describe corrective measures; 4. Be made publicly available; and 5. Proposed changes.	CAR.  Uploaded on to proponent's website.  A copy of Correspondence to CEO.	CEO		Overall	The first CAR submitted due by 8 October 2012  Then, annually by 8 October	TANPF CAR 2012 (OEPA ref. A555982) was submitted to OEPA by October 2012 covering the period from July 2011 to October 2012. TANPF CAR 2013 was prepared by September 2013 and submitted to OEPA by November 2013, covering the period from October 2012 to October 2013. TANPF CAR 2014 is prepared by September 2014 and is to be submitted to OEPA by October 2014, covering the period from October 2013 to October 2014. Annual CARs (CAR 2012, CAR 1013, CAR 2014) are endorsed by the YPNPL Project Director, including a statement of compliance. Submitted annual CARs (CAR 2012, CAR 1013, CAR 2014) are made available under the following link: <a href="http://www.ypnpl.com.au/project-updates.html">http://www.ypnpl.com.au/project-updates.html</a>	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M5.1	Air Quality	The proponent shall adopt and implement best practice pollution control technology as determined by the Chief Executive Officer of the Department of Environment and Conservation (DEC) on advice of the CEO to minimise all relevant emissions from the TANPF ammonium nitrate prilling plant	<p>Adopt and implement EFMA - Best Available Techniques for Pollution Prevention and Control in the European Fertilizer Industry, Booklet No. 6 of 8: Production of Ammonium Nitrate and Calcium Ammonium Nitrate, 2000 (EFMA, 2000b) from the Common Stack (other sources) for the AN plant.</p> <p>DEC to incorporate stack emission concentration figures in the Works Approval and Licence that are commensurate with the use of best practice pollution control technology.</p> <p>Air Dispersion Modeling Study.</p> <p>Operation Air Quality and Monitoring Management (OAQMM) Plan for MINISTER approval.</p> <p>Written correspondence.</p>	<p>CAR.</p> <p>Air Dispersion Modeling Study.</p> <p>Air Quality reports, monitoring records.</p> <p>A copy of Correspondence to CEO/DEC</p>	DEC	CEO	Overall	Ongoing	<p>TANPF Air Quality Management Plan (Doc. No. 0086269 February 2013) was reviewed by the OEPA and it was considered appropriate (letter reference A574214:OEPA2012/0638-1).</p> <p>TANPF Air Quality Management Plan (Att01 of Construction Environmental Management Plan (CEMP)) has been approved by the Environment Assessment and Compliance Division Australian Government Department of SEWPaC (letter reference: 2012/08279).</p>	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M5.2	Air Quality	Prior to construction, the proponent shall prepare and implement an ambient air monitoring programme to the satisfaction of the CEO on the advice of the Chief Executive Officer of the DEC	Prepare a Construction/Operation Air Quality and Monitoring Management (AQMM) Plan for MINISTER approval. Implement the AQMM Plan. Written correspondence.	CAR. Air Quality report. A copy of Correspondence to CEO/DEC	CEO	DEC	Overall	Ongoing	<p>Refer to 870:M5.1 above. Five different monitoring locations have been set up in order to comply with the TANPF Air Quality Management Plan (Att05 of CEMP):</p> <ul style="list-style-type: none"> <li>- Two air monitors are allocated at site boundary. Equipment installed is running since 7 March 2013 (two TEOMs, 2 dust gauges and one weather station). Detailed information about location, equipment, results and records can be found in CAR 2014, Att06, Att07, Att08 and Att09.</li> <li>- Three air monitors are allocated offsite on rock art (Water tanks, Tan Burrup Road, Deep Gorge) and commissioned by September 2013: <ul style="list-style-type: none"> <li>· One ADS Atmospheric Precipitation sampler.</li> <li>· One MIE ADR-1500 particulate monitor (PM10).</li> <li>· One dust deposition gauge (total solids suspended).</li> <li>· NH3, NOx, SOx diffusion tubes (duplicate collocated at each monitoring site).</li> <li>· One tipping rain gauge.</li> <li>· Minivol TAS for PM10 at Water Tanks monitor, in order to compare readings between MIE ADR-1500 and Minivol TAS.</li> </ul> </li> <li>- Monitoring readings can be found in CAR 2014 Att10.</li> <li>- Inventory of water used for dust suppression is included in CAR 2014 Att11.</li> <li>- Additional information (pictures) included under CAR 2014 Att012 and CAR 2014 Att013.</li> </ul>	C

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## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M6.1	Rehabilitation	<p>The proponent shall undertake rehabilitation to achieve the following outcomes: 1. The project area shall be non-polluting and shall be constructed so that its final shape, stability, surface drainage, resistance to erosion and ability to support local native vegetation are comparable to natural landforms within the local area, as demonstrated by a methodology acceptable to the CEO; 2. Native vegetation areas disturbed through implementation of the proposal, shall be progressively rehabilitated with vegetation composed of plant species native to the Burrup Peninsula from propagating material of local provenance (as agreed by the CEO in consultation with the DEC); 3. Areas not currently supporting native vegetation shall be rehabilitated to the original land use or a use approved by the CEO; 4. The percentage cover of living vegetation in all rehabilitation areas shall be comparable with that of nearby undisturbed land as demonstrated by a methodology acceptable to the CEO; 5. No new species of weeds (including both declared weeds and environmental weeds) shall be introduced into the area as a result of the implementation of the proposal; and 6. The coverage of weeds (including both declared weeds and environmental weeds) within the rehabilitation areas shall not exceed that identified in baseline monitoring undertaken prior to the commencement of operations, or exceed that existent on comparable, nearby land which has not been disturbed during implementation of the proposal.</p>	<p>Prepare a Construction Terrestrial Vegetation and Flora Management (CTVFM) Plan for MINISTER approval.</p> <p>Implement the CTVFM Plan.</p> <p>Prepare a Construction Weed Management (CWM) Plan for MINISTER approval.</p> <p>Implement the CWM Plan.</p> <p>Written correspondence.</p>	<p>CAR.</p> <p>Construction rehabilitation reports and inspection records.</p> <p>A copy of Correspondence to CEO/DEC</p>	CEO	DEC	Pre-construction Construction	Ongoing	<p>Construction Terrestrial Vegetation (att09 of CEMP) and Flora Management Plan and Construction Weed Management Plan (att10 of CEMP), approved by the Environment Assessment and Compliance Division Australian Government Department of SEWPaC (letter reference: 2012/08279). CEMP is available in <a href="http://www.ypnpl.com.au/project-updates.html">http://www.ypnpl.com.au/project-updates.html</a></p> <p>A Weed mapping report (CAR 2014 Att0 14) has been developed to identify and prevent the spread of weeds at TANPF' Site.</p> <p>Water trucks are available on Site in case of wash-down is needed.</p> <p>Vehicles/Plant and mobile equipment must be in safe operating condition and therefore are subject to a HSE inspection in accordance with Vehicle/Plant &amp; Mobile Equipment Access Form (CAR 2014 Att15).</p>	C

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M6.2	Rehabilitation	Rehabilitation activities shall continue until such time as the requirements of condition 6-1 are demonstrated by inspections and reports to have been met for a minimum of five years, to the satisfaction of the CEO on advice of the DEC.	Prepare an Operation Terrestrial Vegetation and Flora Management (OTVFM) Plan for MINISTER approval. Implement the OCTVFM Plan. Prepare an Operation Weed Management (OWMP) Plan for MINISTER approval. Implement the OWM Plan. Written Correspondence.	CAR. Operation rehabilitation reports and inspection records. A copy of Correspondence to CEO/DEC	CEO	DEC	Operation	Minimum five years before construction commencement	Same as above	NR
870:M7.1	Fauna	The proponent shall employ such structures and apparatus as are necessary and agreed by the DEC to deter birds from entering the contaminated water pond, clean water pond, and sewage wastewater treatment station evaporation pond	Employ structures and apparatus to deter birds from entering the contaminated and clean ponds. Seek advice from DEC.	CAR. A copy of Correspondence to DEC/CEO	CEO	DEC	Overall	Ongoing	Construction of water pond, clean water pond, and sewage wastewater treatment station evaporation pond progress status: ongoing.	NR

# AUDIT TABLE

## Statement Compliance Section

PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M7.2	Fauna	<p>During construction of the TANPF the proponent shall ensure that the following requirements are met: 1. Fauna refuges are to be placed in the trenches and other construction related voids at intervals not exceeding 50 metres; 2. The proponent shall employ at least two "fauna-clearing people" that are appropriately licensed by the DEC to remove fauna from the trenches and other construction related voids; 3. Inspection and clearing of fauna from trenches and other construction related voids by fauna clearing people shall occur at least twice daily and not more than half an hour prior to backfilling of trenches and other construction related voids, with the first daily inspection and clearing to be completed no later than 3.5 hours after sunrise, and the second inspection and clearing to undertaken daily between the hours of 3:00 pm and 6:00 pm; 4. In the event of rainfall, the proponent shall, following the clearing of fauna from the trenches and other construction related voids, pump out any pooled water in the open trenches and other construction related voids (with the exception of groundwater) and discharge it via a mesh (to dissipate energy) to adjacent vegetated area, having regard for the DEC's draft guideline on the treatment and management of acid sulfate soils and water in acid sulfate soil landscapes (DEC, 2009) and any subsequent revisions; and 5. Within 14 days following completion of the construction activities requiring the use of open trenches and other construction related voids, the proponent shall provide a report on fauna found, both dead and alive, within the TANPF site boundary to the CEO.</p>	<p>Implement the Construction Terrestrial Fauna Management (CTFM) Plan for MINISTER approval.</p> <p>Report on Fauna Found.</p>	<p>CAR.</p> <p>Constructi on Fauna Found reports.</p> <p>Trench Inspection s reports.</p>	CEO	DEC	Pre-constructi on Constructi on	Ongoing Fauna Found Report Within 14 days	<p>Site inspections as per Construction Terrestrial Fauna management plan (Att08 of CEMP), approved by SEWPaC on 22 November 2012 and available at <a href="http://www.ypnpl.com.au/project-updates.html">www.ypnpl.com.au/project-updates.html</a>.</p> <p>Licenses and training certificates available in CAR 2014 Att16.</p> <p>A habitat report prepared to identify the fauna habitats located within the immediate vicinity and the fauna groups that are likely to utilise these habitats (CAR 2014 Att17).</p> <p>Clearing activities were monitored and reported by means of Site Clearing report (CAR 2014 Att018 and CAR 2014 Att019).</p>	C

# AUDIT TABLE

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PROJECT: TECHNICAL AMMONIUM NITRATE PRODUCTION FACILITY, BURRUP PENINSULA, SHIRE OF ROEBOURNE

Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M8.1	Groundwater	The proponent shall undertake detailed hydrogeological studies commencing at least 12 months prior to the commencement of construction to quantify groundwater quality, groundwater flow directions, and the depth to groundwater beneath the TANPF site and in surrounding areas.	Undertake Hydrogeological Studies.	Hydrogeological studies Report.	CEO		Pre-construction	Ongoing	Hydrogeological and Hydrological Investigation was prepared by Environmental Resources Management (ERM) and issued in September 2011. Reference: 0086269.	CLD
870:M8.2	Groundwater	The proponent shall develop appropriate management measures for dewatering to the satisfaction of the CEO on advice of the DEC and the Department of Water in the event that the information gathered from the hydrogeological studies required by condition 8-1 indicates that dewatering would be required during construction	Prepare the Construction Water Quality Management Plan for MINISTER approval, including if required, dewatering management. Written correspondence.	CAR. Groundwater reports. A copy of correspondence.	CEO	DEC, DoW	Pre-construction	Ongoing	Construction Environmental Management Plan (att02 of CEMP), Section 5.4.5 "Dewatering Excavation" includes the measures for dewatering approved by SEWPaC on the 22nd November 2012 and available at <a href="http://www.ypnpl.com.au/project-updates.html">www.ypnpl.com.au/project-updates.html</a> . Measures specify to comply with WA Department of Water (2006) Water Quality Protection Note: Dewatering of soils at construction sites.	C
870:M8.3	Groundwater	The proponent shall design, construct, and locate groundwater monitoring bores to the satisfaction of the CEO on advice of the DEC and the Department of Water, having regard for the outcomes of the hydrogeological studies required by condition 8-1 and the Department of Water's Water Quality Protection Note 30 on Groundwater Monitoring Bores.	Prepare and implement Water Quality Management Plan for MINISTER approval, including groundwater monitoring. Written correspondence.	CAR. Groundwater monitoring report.	CEO	DEC, DoW	Overall	After outcomes of the hydrogeological studies	The groundwater baseline results are recorded in Water Quality Management Plan (attach02 of CEMP), approved by SEWPaC on the 22nd November 2012 and, available at <a href="http://www.ypnpl.com.au/project-updates.html">www.ypnpl.com.au/project-updates.html</a> . CAR 2014 Att20 details the location of the five groundwater wells that were drilled for the baseline study (MW1, MW2, MW3, MW4 and MW5). Construction and decommissioning activities, wells MW1 and MW4 were affected and two additional bores were drilled on the 7th September by GHD. Location of these new bores is shown in CAR 2014 Att21 and car 2014 Att22. The bores were drilled thus complying with: Water Quality Protection Note 30: Groundwater monitoring bores, Department of Water, Government of Western Australia. Minimum construction requirements for water bore in Australia February 2012 third edition.	C
870:M8.4	Groundwater	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.	Implement Water Quality Management Plan, including groundwater monitoring.	CAR. Groundwater reports, records.	CEO		Overall	Every six months	The groundwater baseline results are recorded in Water Quality Management Plan (attach02 of CEMP), approved by SEWPaC on the 22nd November 2012 and, available at <a href="http://www.ypnpl.com.au/project-updates.html">www.ypnpl.com.au/project-updates.html</a> . The water Quality Management Plan includes the groundwater monitoring trigger values at a value of 10% above the baseline contaminant concentrations obtained from the baseline survey. Groundwater monitoring at the wells have been carried out in October 2013 and April 2014. Refer to CAR 2014 Att20.	C

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Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M8.5	Groundwater	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.	Implement Water Quality Management Plan, including groundwater monitoring. Written correspondence.	CAR. Groundwater monitoring report, records. A copy of correspondence to CEO advising of any exceedance. A copy of correspondence to CEO submitting remedial action taken.	CEO		Overall	Within 7 days of the exceedance. Monitoring results biannually, or a frequency defined by CEO	Groundwater monitoring at the wells have been carried out in October 2013 and April 2014. Two of the wells have been replaced to avoid interference with construction activities and proposed operations. The new wells were drilled as near to the original locations as possible but do differ in terms of elevations. Refer to CAR 2014 Att20. YPNPL reported to OEPA the exceedances identified in the October 2013 Ground Monitoring Report (GMR) by November 2013 and the exceedance identified in April 2014 by May 2014, within seven days of the exceedances being identified. The results of both reports displayed some exceedances in the set trigger levels. Therefore, it concluded maintaining natural variability as the main cause for trigger level concentrations. Refer to CAR 2014 Att23.	C
870:M8.6	Groundwater	The proponent shall make the monitoring reports required by condition 8-5(5) publicly available in a manner approved by the CEO	Seek approval from CEO for the monitoring reports.	Monitoring reports publicly available as indicated by CEO. A copy of correspondence to CEO.	CEO		Overall	Biannually, or a frequency defined by CEO	Groundwater Monitoring Reports performed in October 2013 and April 2014 (CER 2014 Att23) are available at YPNPL's website: <a href="http://www.ypnpl.com.au/project-updates.html">www.ypnpl.com.au/project-updates.html</a> .	C
870:M9.1	Acid Sulphate Soils	The proponent shall undertake intrusive acid sulphate soils investigations prior to the commencement of construction	Undertake intrusive acid sulphate investigations.	Acid Sulphate Investigation Report.	CEO		Pre-construction	Ongoing	A Preliminary Acid Sulphate Soil Investigation Report was issued by ERM in August 2011. DEC's letter reference: 0086269.	CLD

# AUDIT TABLE

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Audit Code	Subject	Action	How	Evidence	Satisfy	Advice	Phase	When	Verification September 2013	Status
870:M9.2	Acid Sulphate Soils	In the event that acid sulphate soils are disturbed during construction of the TANPF, the proponent shall treat and manage acid sulphate soils in accordance with the requirements of the DEC's draft guideline on the treatment and management of acid sulfate soils and water in acid sulfate soil landscapes (DEC, 2009) and any subsequent revisions.	Preparation of Acid Sulphate Soils (ASS) Management Plan, if required.	ASS Reports.	CEO	DEC	Construction	After ASS are disturbed	Field investigations undertaken as part of the baseline studies (ERM, 2011) indicate the no presence of Acid Sulphate soils within or adjacent to the proposed construction area. Therefore, an Acid Sulphate soils Management Plan is not required. Up to now, no Acid Sulphate soils have been disturbed and reported during construction activities on TANPF.	C
870:M10.	Decommissioning	Prior to undertaking ground-disturbing activities, the proponent shall: 1. describe the rationale for the siting and design of plant and infrastructure as relevant to environmental protection; 2. prepare a conceptual plan of the final landform at closure; 3. prepare a plan for a care and maintenance phase; and 4. prepare an initial plan for the management of noxious materials following closure.	Preparation of Decommissioning Plan.	Decommissioning Report.	CEO		Decommissioning	Prior to undertaking ground-disturbing activities	The Decommissioning Environmental. Management Plan (DEMP) has been prepared by YPNPL and submitted to OEPA ( YPNPL's letter subject "Reply on OEPA Letter CA01-2013-0018 dated 19th August (NOTICE OF DESKTOP AUDIT OF STATEMENT 870 ", dated 18 Sep 2013).	NR
870:M10.2	Decommissioning	At least six months prior to the anticipated date of closure, the proponent shall meet the following decommissioning criteria: 1. removal or, if agreed in writing by the appropriate regulatory authority, retention of plant and infrastructure agreed in consultation with relevant stakeholders; and 2. identification of contaminated areas, including provision of evidence of notification and proposed management measures to relevant statutory authorities. Note: Closure is defined as production has ceased and, plant and infrastructure removed, and contaminated areas remediated.	Implementation of Decommissioning Plan.	Decommissioning reports. A copy of correspondence.	Min for Env		Decommissioning	At least six months prior to date of closure	The Decommissioning Environmental. Management Plan (DEMP) has been prepared by YPNPL and submitted to OEPA ( YPNPL's letter subject "Reply on OEPA Letter CA01-2013-0018 dated 19th August (NOTICE OF DESKTOP AUDIT OF STATEMENT 870 ", dated 18 Sep 2013).	NR

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## 6. SCHEDULE 1 OF MS 870 COMPLIANCE ASSESSMENT – AUDIT TABLE 2

The Schedule 1 of MS 870 Audit Table 2 purpose is to assess compliance with conditions 1-1 of the Ministerial Statement 870 (MS 870) as follows:

*“The proponent shall implement the proposal as documented and described in schedule 1 of this statement subject to the conditions and procedures of this statement”.*

### 6.1 Schedule 1 of MS 870, Summary of Key Proposal Characteristics – Audit Table 2

**Note:**

- Any elements with status “Audited by proponent only” are legally binding but are not required to be addressed specifically in compliance reports, if complied with.
- Compliance Status: C = Compliant, CLD = Completed, NA = Not Audited, NC = Non – compliant, NR = Not Required at this stage.

Element	Description	Verification September 2014	Status
<b>General</b>			
PROJECT life	20+ years.	<p>Plant is designed for an operating life of 20 years minimum. The plant operates 24 hours per day, seven days a week.</p> <p>The design operating life is 50 years for the main civil and structural work. The piles, concrete foundations, buildings and other structures have design operating lives of 50 years. However, for elements where repair or replacement costs are low and can easily be undertaken maintenance, the design operating life is shorter than 50 years.</p> <p>Throughout the design of the TANPF extreme weather events have been extensively analysed to ensure that the TANPF withstands extreme weather events.</p> <p>Refer to Basic Engineering Design Data, No. 2-300-329-DEB-TRE-0001.</p>	C
Technical ammonium nitrate production facility (TANPF) capacity	350,000 tonnes of technical ammonium nitrate (TAN) per annum.	TANPF 350,000 tonnes of technical ammonium nitrate (TAN) per annum. TANPF start-up is foreseen by July/August 2015.	C
Area of PROJECT lease	Site D –79 hectares.	Site D = 49 Ha (< 79 Ha): area of land within the Burrup Industrial Estate (BIE).	C
Area of disturbance	35 hectares.	Area of disturbance ≤ 35 ha.	C
<b>Main Process Units</b>			
Nitric acid plant	Capacity – 760 tonnes per day.	<p>Nitric acid plant with capacity 760 tonnes per day operation as per Operation Manual (U12) 2-250-329-OPM-TRE-8401.</p> <p>Nitric start-up is foreseen by August 2015.</p>	C



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Element	Description	Verification September 2014	Status
Ammonium nitrate solution plant	Capacity – 965 tonnes per day.	Ammonium nitrate solution plant with capacity 965 tonnes per day as per Operation Manual (U31) 2-250-329-OPM-TRE-8402. Ammonium nitrate solution plant start-up is foreseen by August 2015.	C
TAN prilling plant	Capacity – 915 tonnes per day.	TAN prilling plant operation with capacity 915 tonnes per day as per Operation Manual (U32) 2-250-329-OPM-TRE-8403. TAN prilling plant start- up is foreseen by August 2015.	C
<b>Storage, loading, and transport</b>			
Liquid ammonia pipeline between the TANPF and the adjacent YARA Pilbara Fertilizers PTY Ltd (YPFPL)	710 meters long.	Ammonia pumps in YPFPL's ammonia plant and liquid ammonia pipeline between the TANPF and YPFPL as per: - Plot plans 2-300-329-DWG-TRE-0505 and 2-300-329-DWG-TRE-0505. - Operating Manual (U63) 2-250-329-OPM-TRE-8406.	C
Bagged TAN storage building	Capacity of 1,800 tonnes.	1,800 tonnes bagged TAN storage building as per: - Plot Plan 2-300-329-DWG-TRE-0579. - Operating Manual (U70's) 2-250-329-OPM-TRE-8407.	C
Bulk TAN storage building	Capacity of 12,000 tonnes.	12,000 tonnes bulk TAN storage building as per: - Plot Plan 2-300-329-DWG-TRE-0579. - Operating Manual (U70's) 2-250-329-OPM-TRE-8407.	C
TAN bagging facility	In bagged TAN storage building	TAN bagging facility provided in the Bagged TAN storage building as per: - Plot Plan 2-300-329-DWG-TRE-0579. - Operating Manual (U70's) 2-250-329-OPM-TRE-8407.	C
Truck bulk loading system	Bulk TAN storage building	Truck bulk loading system facility provided in the bulk TAN storage building as per: - Plot Plan 2-300-329-DWG-TRE-0579. - Operating Manual (U70's) 2-250-329-OPM-TRE-8407.	C
Nitric acid buffer storage	Two tanks with total capacity of 3,000 cubic meters.	Nitric Acid Tanks 52-FB-001 A/B: - Mechanical Data sheet 2-300-329-DAT-TRE-4117, - P&ID 2-300-329-PID-TRE-5201 - Plot Plan: 2-300-329-DWG-TRE-0567. - Operating Manual (U52) 2-250-329-OPM-TRE-8405.	C



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Element	Description	Verification September 2014	Status
Ammonium nitrate solution storage	One tank with a capacity of 500 tonnes	Ammonium nitrate solution Tank storage 35-FB-006: - Mechanical Data Sheet, 2-300-329-DAT-TRE-4119 - P&ID, 2-300-329-PID-TRE-3500. - Plot Plan, 2-300-329-DWG-TRE-0549. - Operating Manual (U35) 2-250-329-OPM-TRE-8404.	C
Wastewater discharge pipeline	Connecting the TANPF to the Water Corporation facility	No Wastewater discharge pipeline is connected to water corporation. The only waste water discharge is the sea water return which is around 7264 m <sup>3</sup> /h as per to Operating Manual (U87) 2-250-329-OPM-TRE-8410.	C
<b>Inputs</b>			
Power Requirement	8.5 MW of which 5 MW will be sourced from the adjacent YNFPL's ammonia plant and approximately 3.5 MW will be generated by excess steam from the nitric acid plant.	3.5 MW generated from the excess steam from the nitric acid plant and 5 MW sourced from the adjacent YNFPL's ammonia plant as per Nitric acid plant Operation Manual U12), 2-250-329-OPM-TRE-8401.	C
Potable water	2 cubic metres per hour from the Water Corporation.	Potable water supplied by Water Corporation. A maximum of 5 m <sup>3</sup> /h will be available as per Operating Manual (U92) 2-250-329-OPM-TRE-8412.	C
Seawater	456 cubic metres per hour from the Water Corporation.	500 m <sup>3</sup> /h of sea water will be available and sea water return will be around 7264 m <sup>3</sup> /h. Refer to Operating and Maintenance manual (U87), 2-250-329-OPM-TRE-8410 for further information about sea water.	C
<b>Outputs</b>			
Nitrogen oxides (NOX)	Up to 135 t/yr. Nitric acid plant stack - up to 4.2 g/s. Nitric acid plant storage tanks - Vents A & B - up to 0.04 g/s each vent.	Nitrogen oxides (NOX) estimated under Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. To be verified during commissioning phase (Abril-July).	C
Nitrous oxide (N2O)	Up to 163.7 t/yr, 5.5 g/s.	Nitrous oxide (N2O) estimated under Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. To be verified during commissioning phase (Abril-July).	C
Carbon monoxide (CO)	Up to 41 t/yr, 1.3 g/s.	Carbon monoxide (CO) emissions from TANPF process are not expected. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. CO <sub>2</sub> emissions from truck and vehicles.	CLD
Methane (CH <sub>4</sub> )	Up to 17.8 t/yr, 0.6 g/s.	Carbon monoxide (CO) emissions from TANPF process are not applicable. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002.	CLD



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Element	Description	Verification September 2014	Status
Ammonia (NH3)	Ammonium nitrate prilling plant "common stack" - Refer to Condition 5. Nitric acid plant stack - up to 0.02 g/s.	Ammonia (NH3) emissions estimated under Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. To be verified during commissioning phase (Abril-July).	C
Particulate matter [as total suspended particulates (TSP)]	Ammonium nitrate prilling plant "common stack" - Refer to Condition 5.	TSP emissions estimated under Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. To be verified during commissioning phase (Abril-July).	C
Sulphur dioxide (SO2)	Trace.	Sulphur dioxide (SO2) emissions from TANPF process are not expected. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002.	CLD
Carbon dioxide (CO2) [produced]	Up to 532.6 t/yr, 17.8 g/s.	Carbon monoxide (CO) emissions from TANPF process are not expected. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. CO2 emissions from truck and vehicles.	C
Total greenhouse gas emissions	Approximately 84,451 tonnes of CO2-e per year.	Greenhouse gas emissions from TANPF process are not expected. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002. Greenhouse gas emissions from truck and vehicles.	C
Greenhouse gas intensity	Approximately 0.241 tonnes of CO2-e per tonne of TAN.	Greenhouse gas emissions from TANPF process are not expected. Refer to Waste Water Summary and Gaseous emissions, 2-300-329-LST-TRE-0002.	C
Wastewater	Up to 3,104 ML of water per year consisting of up to 3000 ML of sea water blowdown per year and up to 104 ML of purified process condensate per year discharged into the Water Corporation's multi user brine return line (MUBRL). Up to 24.6 ML of water per year consisting of air conditioning condensate and rainwater from roofs and the parking area will be sent to the clean water pond for evaporation. Up to 9.75 ML of water per year containing impurities will be sent to the contaminated water pond for evaporation.	Removal of 'Wastewater' from the key proposal characteristics table. Refer to BURRUP Technical Ammonium Nitrate Production Facility (Ministerial Statement) section 45 C application, 9 July 2013.	CLD
Solid waste	Up to 120 kilograms per day (organic matter from the off-specification pills).	To be verified during operation phase (Abril-July).	C

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## 6.2 Schedule 1 of MS 870, References

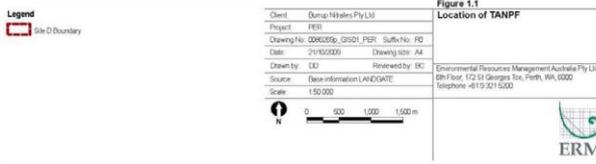
1. Burrup Nitrates Pty Ltd (2010). *Technical Ammonium Nitrate Production Facility Public Environmental Review for Burrup Nitrates Pty Ltd*. January 2010.

## 6.3 Schedule 1 of MS 870, Figures (attached)

Refer below to Figure 1 (site D 79 Ha) and the updated Figure 1 (Site D 49Ha), Regional location (Source: Figure 1.1 from Burrup Nitrates Pty Ltd, 2010).



Site D: 79 Ha.



Site D: 49 Ha.



Refer to Figure 2 (site D: 79 Ha) and the updated Figure 2 (Site D 49Ha), Regional location (Source: Figure 4.2 from Burrup Nitrates Pty Ltd, 2010).

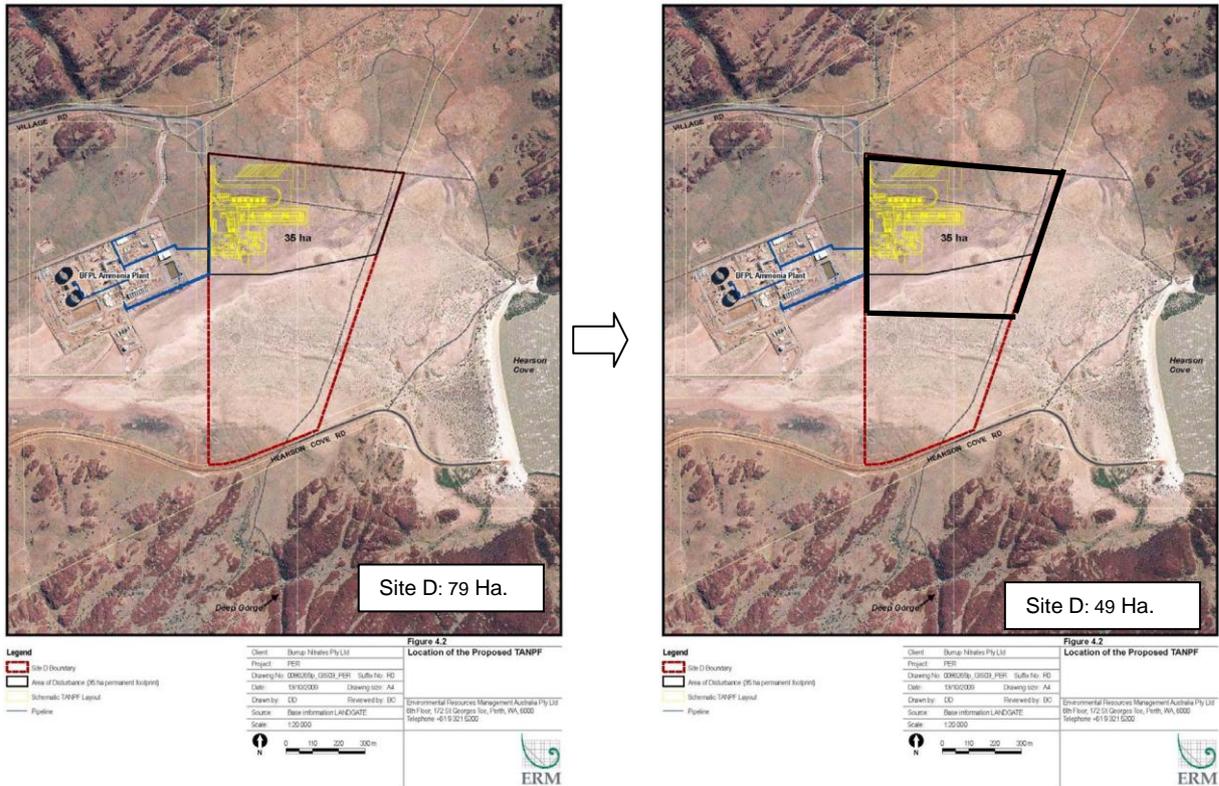


Figure 3 including the Conceptual plant layout (Source: Figure 5.5 from Burrup Nitrates Pty Ltd, 2010) has been updated to current PROJECT PLOT PLAN rev 07.

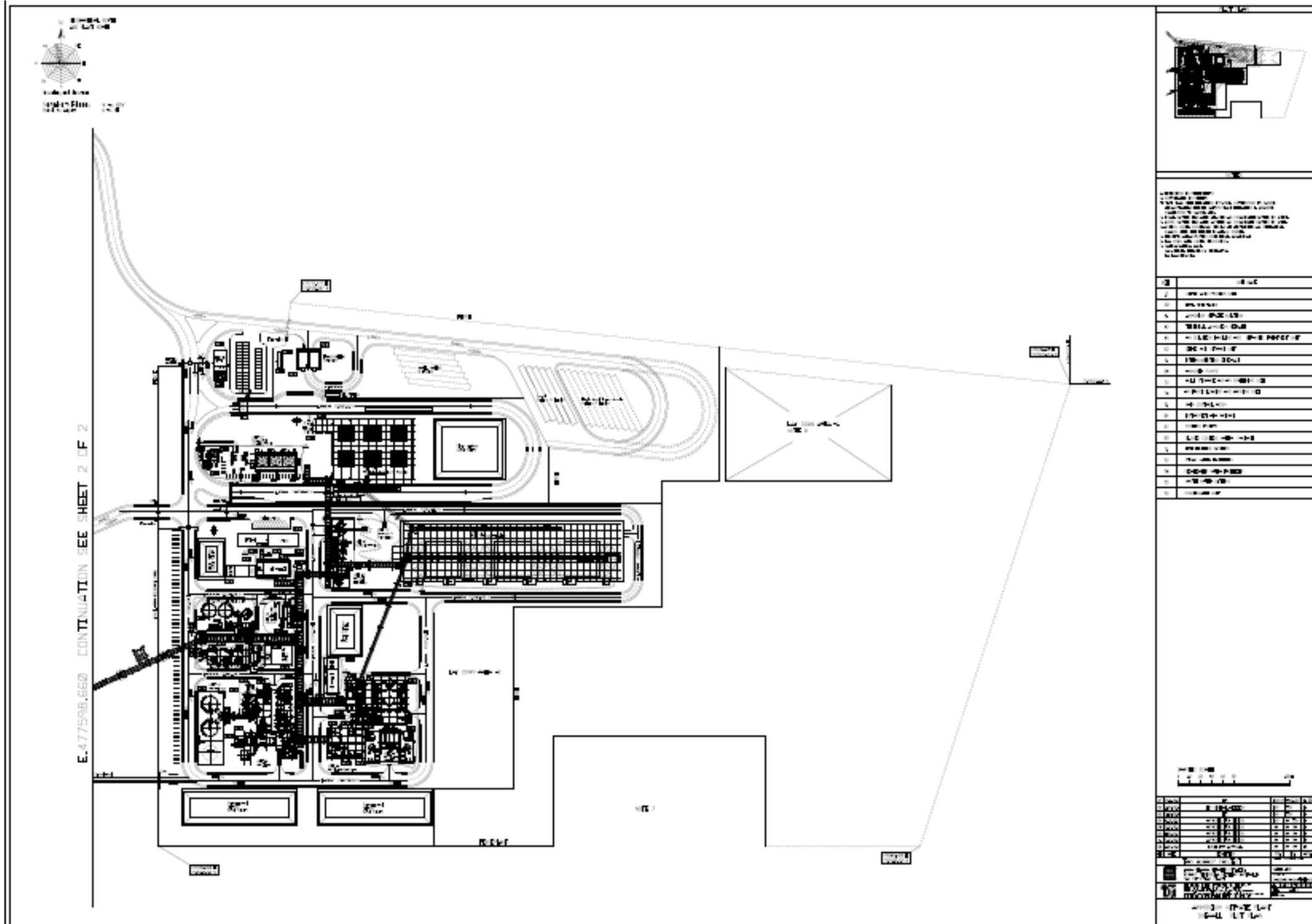


Figure 3: Current plant layout (Source: Ammonium Nitrate Plant Overall Plot Plan, 2-300-329-DWG-TRE-0505, rev. 07, 24-January 2014)

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## 7. REFERENCES

### 7.1 Letters/Correspondence

- Letter OEPA 23/Ago/2012 (CAP acceptance), reference: A533490:OEPA2011/000430.
- Letter DEC 2012/1504 (Acid Sulfates Investigation acceptance), reference: 2012/1501.
- BURRUP Technical Ammonium Nitrate Production Facility (Ministerial Statement) section 45 C application, 9 July 2013.
- Ministerial Statement 870 – Technical Ammonium Nitrate Production Facility, BURRUP PENINSULA, SHIRE OF ROEBURNE, August 2013.
- OEPA’s Letter “Notice of Desktop Audit of Statement 870, ref: 0131CA01-2013-0018; 2013-00002111206”, 19 August 2013.
- YPNPL’s Letter: “Reply on OEPA Letter’s NOTICE OF DESKTOP AUDIT OF STATEMENT 870 – YPNPL, reference CA01-2013-0018 dated 19th August”, dated 18 Sep 2013”.
- OEPA’s Notification “Verification Site Inspection Scope - Ammonia Nitrate Facility- MS870 - 22 October 2013”.
- YPNPL’s Letter “Reply on OEPA Letter’s NOTICE OF DESKTOP AUDIT OF STATEMENT 870 – YPNPL, reference CA01-2013-0018 dated 19th August”, dated 18 Sep 2013”.
- OEPA’s Letter “The Resolutions of non compliance report”, dated on 15th January, 2014, OEPA Reference CA01-2013-018).
- YPNPL’s Letter reference 250-500-LET-EPA-0005, dated on 14th February, 2014.
- OEPA’s Letter reference: 2014.0000631365.

### 7.2 Environmental Permitting Approvals

- Compliance Assessment Plan (CAP), 2-250-329-PRO-TRE-0104 approved on 23 August 2012.
- Burrup Nitrates Pty Ltd (2010). TANPF Public Environmental Review (PER) for Burrup Nitrates Pty Ltd. January 2010.
- YPNPL Works approval by DEC (15/07/2011).

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- Ministerial Statement 870 under EPA Act (07/07/2011).
- Commonwealth Approval decision under EPBC Act (14/09/2011).

### 7.3 PROJECT Documents

#### 7.3.1 General

- PROJECT Air Quality Assessment, Dec. 2009, reference: 0086269RP02-AQ.
- Preliminary Acid Sulfate Soil Investigation Report, Augustus 2011; reference: 0086269. [1]
- Hydrogeological and Hydrological Investigation, Sep 2011; reference: 0086269.
- Construction Air Quality Management Plan, June 2012; reference: 0086269 BPNL TANPF.

#### 7.3.2 Construction Environmental Management Plan (CEMP)

- Construction Environmental Management Plan, 2-250-329-PRO-TRE-0111.
  - 2-250-329-PRO-TRE-0111-att01 , Construction Air Quality Management Plan
  - 2-250-329-PRO-TRE-0111-att02, Construction Water Quality Management Plan
  - 2-250-329-PRO-TRE-0111-att03, Construction Erosion Control & Stormwater
  - 2-250-329-PRO-TRE-0111-att04, Construction Waste Management Plan
  - 2-250-329-PRO-TRE-0111-att05, Construction Traffic Management Plan
  - 2-250-329-PRO-TRE-0111-att06, Blasting Management Plan
  - 2-250-329-PRO-TRE-0111-att07, Construction Noise Management Plan
  - 2-250-329-PRO-TRE-0111-att08, Construction Terrestrial Fauna Management Plan
  - 2-250-329-PRO-TRE-0111-att09, Construction Terrestrial Vegetation and Flora Management Plan
  - 2-250-329-PRO-TRE-0111-att10, Construction Weed Management Plan
  - 2-250-329-PRO-TRE-0111-att11, Integrated Pest Management Plan
  - 2-250-329-PRO-TRE-0111-att12, Construction Site HSE Management Plan
  - 2-250-329-PRO-TRE-0111-att13, Construction Planning and Milestones

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### 7.3.3 Environment Compliance Report

#### 7.3.3.1 June 2013-December 2013

- 2-250-329-REP-TRE-8044, Compliance Report for Blast Operations
- 2-250-329-REP-TRE-8045, Compliance Report for Erosion Control and Stormwater Management
- 2-250-329-REP-TRE-8046, Compliance Report for Terrestrial Vegetation and Flora Management
- 2-250-329-REP-TRE-8047, Compliance Report for Noise Management
- 2-250-329-REP-TRE-8048, Compliance Report for Integrated Pest Management
- 2-250-329-REP-TRE-8049, Compliance Report for Terrestrial Vegetation and Flora Management
- 2-250-329-REP-TRE-8050, Compliance Report for Traffic Management
- 2-250-329-REP-TRE-8051, Compliance Report for Waste Management
- 2-250-329-REP-TRE-8052, Compliance Report for Weeds Management
- 2-250-329-REP-TRE-8053, Compliance Report for Water Quality Management
- 2-250-329-REP-TRE-8054, Compliance Report for Air Quality Management

#### 7.3.3.2 January 2014-June 2014

##### 2-250-329-REP-TRE-8055, Annual Environmental Compliance Report

- 2-250-329-REP-TRE-8056 Compliance Report for Erosion Control and Stormwater
- 2-250-329-REP-TRE-8057 Compliance Report for Terrestrial Vegetation and Flora Management
- 2-250-329-REP-TRE-8058 Compliance Report for Integrated Pest Management
- 2-250-329-REP-TRE-8059 Compliance Report for Noise Management
- 2-250-329-REP-TRE-8060 Compliance Report for Air Quality Management
- 2-250-329-REP-TRE-8061 Compliance Report for Terrestrial Fauna Management
- 2-250-329-REP-TRE-8062 Compliance Report for Waste Management

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- 2-250-326-REP-TRE-8063 Compliance Report for Water Quality Management
- 2-250-329-REP-TRE-8064 Compliance Report for Weeds Management
- 2-250-329-REP-TRE-8065 Compliance Report for Traffic Management
- 2-250-329-REP-TRE-8066 Compliance Report for Air Quality Monitoring Report at CSIRO Rock Art Sensitive Receptors

## 8. ATTACHMENTS

- 2-250-329-REP-TRE-8001-Att01: TAN Burrup Project's footprint. Work permit for clearing activities.
- 2-250-329-REP-TRE-8001-Att02: Main access, Fence.
- 2-250-329-REP-TRE-8001-Att03: Project Execution Schedule.
- 2-250-329-REP-TRE-8001-Att04: Tan Burrup's Site induction.
- 2-250-329-REP-TRE-8001-Att05: Air Quality Monitoring locations.
- 2-250-329-REP-TRE-8001-Att06 Monitoring on PM10 at site boundary.
- 2-250-329-REP-TRE-8001-Att07 Monitoring on dust deposition at site boundary.
- 2-250-329-REP-TRE-8001-Att08 Certificate for weather station.
- 2-250-329-REP-TRE-8001-Att09 Weather measurement (wind speed / direction, temperature and rainfall).
- 2-250-329-REP-TRE-8001-Att10 Monitoring on PM10 at Rock Art sites.
- 2-250-329-REP-TRE-8001-Att11 Water inventory for dust suppression.
- 2-250-329-REP-TRE-8001-Att12 Pictures air quality monitoring equipment at site boundary.
- 2-250-329-REP-TRE-8001-Att13 Pictures air quality monitoring equipment at rock art.
- 2-250-329-REP-TRE-8001-Att14 Weed Mapping report
- 2-250-329-REP-TRE-8001-Att15 Vehicle/Plant & Mobile Equipment Access Form. Vehicle Hygiene and Weed inspection Form.
- 2-250-329-REP-TRE-8001-Att16 Fauna Catalogues. Licenses 17 Training certificates.
- 2-250-329-REP-TRE-8001-Att17 Habitat Report.

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- 2-250-329-REP-TRE-8001-Att18 Site Clearing report.
- 2-250-329-REP-TRE-8001-Att19 Fauna shelter.
- 2-250-329-REP-TRE-8001-Att20 Groundwater wells for baseline study.
- 2-250-329-REP-TRE-8001-Att21 Ground Monitoring Wells Final Locations
- 2-250-329-REP-TRE-8001-Att22 New Groundwater wells to replace MW1 and MW4.
- 2-250-329-REP-TRE-8001-Att23 Groundwater Quality Monitoring.