



Yara Pilbara Nitrates  
2018 Compliance Assessment Report  
Ministerial Statement 870  
Technical Ammonium Nitrate Production Facility

04-10-2018 650-200-CAR-YPN-0039 Rev 0

# Yara Pilbara Nitrates

## 2018 Compliance Assessment Report

### Ministerial Statement 870

### Technical Ammonium Nitrate Production Facility

<b>Document No:</b>	650-200-CAR-YPN-0039
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<b>Document Custodian</b>	Environmental Superintendent
<b>Document Approver</b>	Plant Manager

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### Proponent Declaration

Yara Pilbara Fertilisers Pty Ltd is pleased to submit this Compliance Assessment Report as per condition 4-6 of Ministerial Statement 870.

I, Chris Rijksen, Plant Manager declare that I am authorised on behalf of Yara Pilbara Nitrates Pty Ltd (being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature: .....

Date: 5/10/2018 .....

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## 1 Introduction

### 1.1 Purpose

This Compliance Assessment Report (CAR) outlines the compliance status of Yara Pilbara Nitrates Pty Ltd (YPN) against the conditions of Ministerial Statement 870 (MS870) for the period 8 July 2017 to 7 July 2018.

This CAR has been prepared for the purpose of meeting the requirements of Condition 4-6 of MS870, which requires the proponent, YPN, to submit compliance reports to the Department of Water and Environmental Regulation (DWER) annually by 8 October.

### 1.2 Project Details

The Technical Ammonium Nitrate Production Facility (TANPF) will have a production capacity of 350,000 tonnes per annum (TPA) or 915 tonnes per day (TPD) of Technical Ammonium Nitrate (TAN). The project comprises three (3) major process units, each producing a separate product in the manufacturing process:

1. Nitric Acid Plant to convert ammonia and atmospheric air into nitric acid (NA). The NA unit has a capacity of 760 TPD as 100% weight. The main feedstock, ammonia, shall be delivered from the adjacent ammonia plant.
2. Ammonium Nitrate (AN) Solution Plant to convert ammonia and NA into AN solution. This AN wet section has a capacity of 965 TPD in balance with nitric acid production capacity.
3. TAN Prilling Plant to convert AN solution into TAN prills (final product). This is a dry section for production of TAN prills (0.7 and 0.8 kg/l density) with a capacity of 915 TPD. Surplus AN solution shall be sold as liquid.

The project also has storage, loading and transport facilities, including an incoming liquid ammonia pipeline, bulk and bagged TAN storage, bulk loading system, bagging unit and truck loading.

### 1.3 Environmental Approvals

During the audit period the Project was subject to the following approvals under the *EP Act*:

1. MS870;
2. Works Approval W4701/2010/1 for the construction and commissioning of the Technical Ammonium Nitrate Production Facility.
3. Operating Licence L7997/2002/11 issued by the former Department of Environment Regulation (DER), now DWER; and
4. EPBC Act approval



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#### 1.4 Revision of the Operational Environmental Management Plan

YPN's Operational Environmental Management Plan (OEMP) was approved by the Department of Environment and Energy in September 2017. The plan is the central document used to manage environmental issues throughout the operational phase of the YPN and will be used to inform monitoring arrangements required to meet conditions of MS870 specific to operations.

#### 1.5 Compliance Reporting History

Previous compliance reporting for the Project includes:

- 2012 CAR for audit period July 2011 to October 2012, submitted to DWER in October 2012;
- 2013 CAR for audit period October 2012 to October 2013, submitted to DWER in October 2013;
- 2014 CAR for audit period October 2013 to October 2014, submitted to DWER in October 2014;
- 2015 CAR for audit period October 2014 to October 2015, submitted to DWER in March 2016;
- 2016 CAR for audit period 8 July 2015 to 7 July 2016, submitted to DWER in October 2016;
- 2017 CAR for audit period 8 July 2016 to 7 July 2017, submitted to DWER in October 2017; and
- 2017 Desktop DWER Compliance Audit Report for MS870, dated September 2017.



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## 2 Audit Methodology

### 2.1 Purpose and Scope

A full and comprehensive audit (undertaken by an independent auditor, refer to Section 2.2 below) was undertaken to determine compliance with MS870 for the period 8 July 2017 to 7 July 2018 and the 2018 CAR is to be submitted to DWER by 8 October 2018.

The scope of the compliance audit comprised:

- MS870 Conditions + Schedule 1 (as amended 7 June 2017); and
- YPN environmental management plans and procedures as required under MS870.

### 2.2 Methodology

YPN contracted Sustainability Pty Ltd (Sustainability) to undertake a full and comprehensive compliance audit. The audit was conducted by Damon Carter CQI/IRCA Lead Auditor. The audit was carried out using the DWER (formerly OEPA) audit table for MS870, comprising Ministerial Conditions M1-M10 and Attachment 2.

The audit was performed at the TANPF and involved reviewing documents and records, a site inspection and interviews with YPN personnel. The following personnel were interviewed during the auditing process:

- Susan Giles (Environmental Superintendent at YPN);
- Susanna Delbost (Environmental Officer at YPN);
- Nicole Ivory (Graduate Environmental Officer at YPN); and
- Doug Velho (Graduate Process Engineer at YPN).

A register of documents and records reviewed is listed in Appendix 3.

### 2.3 Audit Terminology

The "status" field of the audit table describes the implementation of actions and compliance with MS870. Although the Chief Executive Officer of DWER makes the final determination of compliance, it is necessary to update this field each reporting period, as the project progresses. DWER has prepared updated guidance related to the preparation of compliance audits, including generic expressions that are used to identify the status of each action (



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Table 1).





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**Table 1: Compliance Status Terms**

<b>Status</b>	<b>Status Abbreviation</b>	<b>Description</b>
Compliant	C	Implementation of the proposal has been carried out in accordance with requirements of the audit element.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.
Potentially non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with requirements of the audit element.
In process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.

Source: Adapted from Section 2.8 of DWER's Post Assessment Guideline (PAG 1) Preparing an Audit Table



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### 3 Compliance

#### 3.1 Statement of Compliance

The results of the audit of MS870 are shown in the DWER Audit Table (Appendix 1). A total of 27 items were audited.

The audit found the following:

- 12 elements were found to be compliant;
- 8 elements were found to be completed;
- 4 elements were found to be not required at this stage;
- 1 element was assessed as being non-compliant; and
- 2 elements were assessed as being potentially non-compliant.

As per the “DWER Statement of Compliance Guidelines”, each non-compliance and potential non-compliance is presented in the “Post Assessment Form 2” format in Section 3.4.

##### 3.1.1 Proposal and Proponent Details

Proposal Title	<i>Technical Ammonium Nitrate Production Facility, Burrup Peninsula</i>
Statement Number	<i>Statement Number 870</i>
Proponent Name	<i>Yara Pilbara Nitrates Pty Ltd</i>
Proponent's Australian Company Number (where relevant)	<i>127 391 422</i>

##### 3.1.2 Statement of Compliance Details

Reporting Period	<i>8 July 2017 to 7 July 2018</i>						
Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	<input type="checkbox"/>	Construction	<input type="checkbox"/>	Operation	<input checked="" type="checkbox"/>	Decommissioning	<input type="checkbox"/>
Audit Table for Statement addressed in this Statement of Compliance is provided at:						<i>Appendix 1</i>	
Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)							
No	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>				



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### 3.2 Non-Compliances

A non-compliance (NC) was recorded against the following element of the MS870 DWER Audit Table:

- 870:M5-2 Air quality monitoring program implementation

Two (2) Potential non-compliances were recorded against the following elements of the MS870 DWER Audit Table

- 870:M4-1 Prepare and maintain a compliance assessment plan (CAP)
- 870:M7-1 Structures and apparatus to deter birds from entering ponds

Table 2 summarises the non-compliance found in relation to elements of the DWER Audit Table. Further detail can be found in the audit table in Appendix 1.

**Table 2: Non-Compliances**

No.	Audit Code	Requirement	Status	Audit Findings
<b>Ministerial Statement 870 Conditions</b>				
NC #1	870:M5-2	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.	NC	YPN has not implemented the air quality monitoring programme as approved by the CEO. Air quality monitoring has been undertaken through the assessment period in accordance with the air quality monitoring programme approved by the Department of Environment and Energy under EPBC Act approval 2008/4546.



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### 3.3 Potential Non-Compliances

Table 3 summarises the potential non-compliances relating to elements of the DWER Audit Table. Further detail can be found in the audit table in Appendix 1.

**Table 3: Potential Non-Compliances**

No.	Audit Code	Requirement	Status	Audit Findings
<b>Ministerial Statement 870 Conditions</b>				
PNC #1	870:M4-1	The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the CEO.	PNC	<p>TAN Burrup Project Compliance Assessment Plan (MS 870) (CAP) rev. 01 (Ref: 2-250-329-PRO-TRE-0104) was approved by the OEPA in a letter dated 23 August 2012 (Letter not sighted, as noted in 2017 CAR).</p> <p>Since approval of the CAP MS870 has been amended and reissued twice (Attachment 1 dated 9 July 2013 and Attachment 2 dated 7 June 2017).</p> <p>To date there has not been any revision of the CAP to accommodate the changes in Attachment 1 and Attachment 2 and the change in status from construction of the proposal to operation.</p>
PNC #2	870:M7-1	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.	PNC	At the time of audit the agreed bird deterrent structures and apparatus was not in place on some of the ponds within the TANPF.



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### 3.4 Details of Non-Compliances and Potential Non-Compliances

#### 3.4.1 NC #1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
870:M5-2 Air Quality Monitoring Programme: Prior to construction prepare and implement an ambient air quality monitoring programme to the satisfaction of the CEO	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Non-compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
NA	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally      Date _____ <input checked="" type="checkbox"/> Reported to OEPA in writing      Date 06/10/2017	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
For the reporting period 8 July 2017 to 7 July 2018 air quality monitoring was not implemented as noted in the TANPF Air Quality Management Plan (AQMP) Doc. No. 0086269 February 2013 (as approved by the CEO DWER). However, air quality monitoring was undertaken during the assessment period as outlined below.	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
<p>The transition from construction phase (completed in February 2016) for the TANPF to commissioning/ operation of the TANPF required a change in the air quality monitoring (AQM) being undertaken in order to monitor operational outputs. DWER acknowledged the need to change. As noted in the 2017 CAR for this condition (600-200-CAR-YPN-0038) a request for variation to the required implementation of the AQMP was approved by OEPA on 22 December 2016, with the intention that post construction air quality monitoring would be carried out as described within the "Operational Monitoring" section in the approved Plan.</p> <p>At the same time the operating licence was in process and there was a requirement to include AQM as part of the required Operational Environmental Management Plan (OEMP). Air quality monitoring has subsequently been implemented in line with the Air Quality Management arrangements approved by Department of Environment and Energy (DEE) as part of the OEMP.</p>	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
The OEMP including air quality monitoring has been approved by the DEE and air quality monitoring has been implemented as noted in the plan. Review and amendment of documentation to meet the requirements of M5-2 of MS870 is underway.	



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What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?

Monitoring has continued since issue of the Operating Licence with the first monitoring report against compliance with the OEMP (and AQMP) due to be submitted to the DEE 6 October 2018. The report will inform updates to trigger levels contained in the AQMP

Please provide information/documentation collected and recorded in relation to this implementation condition or procedure:

- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)



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### 3.4.2 PNC #1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
870:M4-1 Compliance Reporting: The proponent shall prepare and maintain a compliance assessment plan to the satisfaction of the CEO.	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Potentially Non-Compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
7 June 2017	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally      Date _____ <input type="checkbox"/> Reported to OEPA in writing      Date _____	<input checked="" type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
<p>The CAP was first submitted to the (then) OEPA on 9 August 2012 and approved 23 August 2012. Since approval of the CAP, MS870 has been amended and reissued twice (Attachment 1 to MS870 dated 9 July 2013 and Attachment 2 to MS870 dated 7 June 2017).</p> <p>To date there has not been any revision of the CAP to accommodate the changes in Attachment 1 and Attachment 2 and the change in project status from construction to operation.</p>	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
Not applicable.	
What was the cause(s) of the non-compliance or potential non-compliance?	
MS870 has been updated with the authorised extent of TANPF key characteristics amended in Attachment 2. In addition, the status of the TANPF has changed from construction to operational phase resulting in the completion of several conditions included in MS870	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
Revise the Compliance Assessment Plan to consider completed (CLD) conditions and incorporate the amended requirements.	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Not applicable.	



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- in the reporting period addressed in this Statement of Compliance; and
- as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance.

(the above information may be provided as an attachment to this Statement of Compliance)





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### 3.4.3 PNC #2

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
870:M7-1 Fauna: Employ structures and apparatus to deter birds from entering the contaminated water pond, clean water pond, and sewage wastewater treatment station evaporation pond	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
Potentially Non-Compliant	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
27 August 2018	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to OEPA verbally      Date _____ <input type="checkbox"/> Reported to OEPA in writing      Date _____	<input checked="" type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
<p>At the time of audit bird deterrent systems as agreed with Department of Parks and Wildlife (DPaW) were not in place for all ponds.</p> <p>Repair and replacement of the bird deterrent systems had been initiated and is expected to be complete by the time all ponds are back in operational order.</p>	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
Pond 4 and Pond 5	
What was the cause(s) of the non-compliance or potential non-compliance?	
Previously the bird deterrent wires have been checked as part of environmental inspections, with maintenance requirements then reported to operational staff. This has not occurred more recently due to the ponds undergoing repair and maintenance.	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
At the time of audit, the process for repairing the bird deterrent systems had been initiated with bird wire provided to operational staff and a work request issued to have bird deterrent systems reinstated as per requirements.	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Not applicable.	



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#### 4 Conclusion

YPN has been found to be compliant with the majority of conditions for MS870. One element, M5-2, remains non-compliant from the 2017 CAR however air quality monitoring has been conducted in accordance with arrangements approved by Department of Environment and Energy under EPBC Act approval for the project. YPN intend to submit revised air quality monitoring arrangements as noted in the approved OEMP to DWER following submission of the air quality monitoring report to DEE in October 2018

M4-1 was found to be potentially non-compliant, with the compliance action plan (M4-1) requiring review and update in line with amendments to MS870 (7 June 2017) and the transition from construction phase to operations.

A second potential non-compliance was found against M7-1 with not all ponds on site having the approved bird deterrent apparatus (i.e. wires at approximate 5m spacings) in place. At the time of audit corrective action to reinstate the bird deterrent system on all ponds was already underway.



**Appendix 1 – DWER Audit Table**

NOTES

- Phases that apply in this table = **Pre-Construction, Construction, Pre-Commissioning, Operation, Decommissioning, Overall (several phases)**.
- This audit table is a summary of the requirements applying to this Project. Refer to MS870 issued under Part IV of the *EP Act* for details/precise wording of audit elements.
- Code prefixes: M = Minister's condition and P = Proponent's commitment.
- Abbreviations: Min Env = Minister for the Environment;
- Compliance Status: C = Compliant, CLD = Completed, NR = Not required at this stage, PNC = Potentially non-compliant, NC = Non-compliant. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.
- Acronyms list: YPN = Yara Pilbara Nitrates Pty Ltd; CAR = Compliance Assessment Report; DWER = Department of Water and Environmental Regulation; CEO = Chief Executive Officer of DWER; N/A = not applicable; OEPA = Office of the Environmental Protection Authority (now DWER); DEP = Department of Environmental Protection (now DWER); DEPWRC = Department of Environmental Protection Water and Rivers Commission (now DWER); FESA = Fire and Emergency Services Authority of Western Australia.

**Table 4: MS870 DWER Audit Table**

Audit Code	Subject	Requirement (extracted directly from MS870)	How	Evidence	Phase	Timeframe	Status	Further Information
<b>Ministerial Statement 870 Conditions</b>								
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.	Proposal to be implemented in accordance with Schedule 1 of Statement No. 870 (updated as Attachment 2 of MS870), including the key proposal characteristics.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017). [1]  Summarised in sections 1.1, 'Background' and 1.2 'Current Status' of this CAR	Overall	Ongoing	C	There has been no change to the extent of the development envelope or the disturbance footprint during the reporting period. Both remain within the delineation coordinates confirmed by DWER in Attachment 2 of MS870 (refer to Attachment 1-1).  The TANPF has not been in operation for the majority of the reporting period, however processes to monitor production against the authorised production limits have been implemented.
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.	Provide written notification including the details of the name and address of the new proponent.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017). [1]	Overall	Ongoing	C	The proponent for the initial issue of MS870 (6 July 2011) was Burrup Nitrates Pty Ltd. The proponent for MS870 has been updated to Yara Pilbara Nitrates Pty Ltd, as noted in Attachment 1 (9 July 2013) and Attachment 2 (7 June 2017) of MS870.  The registered proponent contact details are Yara Pilbara Nitrates Pty Ltd Level 5, 182 St Georges Terrace, Perth, WA 6000, as noted in correspondence from DWER 21 September 2017, pertaining to the 'Notice of Compliance Audit of Ministerial Statement 870', and noted in the findings of the 2017 CAR (600-200-ACR-YPN-0005)
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.	Provide written notification to the CEO of any change in proponent details.	Ministerial Statement 870 (as amended) (Attachment 2 - 07/06/2017). [1]	Overall	Within 30 days of such change	NR	No change within reporting period.
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	Provide written notification to the CEO that the proposal has been substantially commenced within 5 years of the date of MS870.	N/A	Overall	Before 7 July 2016	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.



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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.	Provide written notification to the CEO that the proposal has been substantially commenced within 5 years of the date of MS870.	N/A	Overall	Before 7 July 2016	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.
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 Compliance Assessment Plan (CAP) and an audit table in accordance with the 'Post Assessment Guideline for Preparing an Audit Table'. Written correspondence to/from CEO.	TAN Burrup Project Compliance Assessment Plan (MS 870) (CAP) rev. 01 (Ref: 2-250-329-PRO-TRE-0104)  Ministerial Statement 870 (as amended) (09/07/2013 and 07/06/2017). [1]	Overall	Ongoing	PNC	TAN Burrup Project Compliance Assessment Plan (MS 870) (CAP) rev. 01 (Ref: 2-250-329-PRO-TRE-0104) was prepared by the EPC for the project and submitted on 9 August 2012. The OEPA approved the CAP in a letter dated 23 August 2012 (Letter not sighted, as noted in 2017 CAR).  Since approval of the CAP MS870 has been amended and reissued twice (Attachment 1 dated 9 July 2013 and Attachment 2 dated 7 June 2017).  To date there has not been any revision of the CAP to accommodate the changes in Attachment 1 and Attachment 2 and the change in status from construction of the proposal to operation.  It is recommended that the CAP be updated to include changes to MS870 and to reflect current status of the TANPF
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 of compliance assessments, 3. retention of compliance assessments, 4. methods of reporting non-compliances and corrective actions reporting, 5. Table of contents of CAR and 6. Public availability of CAR.	Approved CAP.  CAR's available on proponent's website	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	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017.  Although PNC is noted as the finding for M4-1, this condition remains completed as it is specific to the submittal of the CAP at least 6 months prior to the first compliance report, which has been completed.
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.	Overall	CAR annually by 8 October	C	Compliance has been assessed annually, as evidenced by annual CARs: <ul style="list-style-type: none"> <li>• TAN Plant MS870 Compliance Assessment Report 2012</li> <li>• TAN Plant MS870 Compliance Assessment Report 2013</li> <li>• TAN Plant MS870 Compliance Assessment Report 2014</li> <li>• TAN Plant MS870 Compliance Assessment Report 2015</li> <li>• TAN Plant MS870 Compliance Assessment Report 2016</li> <li>• TAN Plant MS870 Compliance Assessment Report 2017</li> </ul> All CARs are publicly available via the link noted in response to M4-4 below.



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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	Overall	When required by CEO	C	Annual CARs are retained by YPN and are publicly available online via the link below: <a href="https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/">https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/</a>
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. Groundwater monitoring reports	Overall	Within 7 days of non-compliance being known	C	Groundwater monitoring was undertaken on 12 September 2017 with laboratory results received 5 October 2017 (refer to Attachment 8-5(5)) The report, noting exceedances, was provided to DWER 11 October 2017, within the 7-day reporting requirement of MS 8-5 (refer to email correspondence (Attachment 8-5(1)) and groundwater monitoring report (Attachment 8-5(2)),  Groundwater monitoring was undertaken on 13 March 2018 with laboratory results received 29 March 2018. The report, noting exceedances, was provided to DWER 5 April 2018, within the 7-day reporting requirement of MS 8-5 (refer to transmittal (Attachment 8-5(3)) and groundwater monitoring report (Attachment 8-5(2)).
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.	Overall	The first CAR due to be submitted 8 October 2012.  Then, annually on or before 8 October each year.	C	CARs have been submitted annually to the CEO since the initial CAR in October 2012 as noted in response to M4-3 above.  During the current reporting period CAR 2017 was submitted to the CEO (DWER) 06 October 2017  In accordance with M4-6 CARs: 1. are endorsed by the YPN Plant Manager; 2. include a statement of compliance; 3. identify all potential non-compliances; 4. are retained by YPN and are publicly available on the company website (see M4-4) 5. indicate any proposed changes to the CAP
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 TAN Plant Ammonium Nitrate Prilling Plant.	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.  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.  Air Dispersion Modelling Study.	CAR. Extract of correspondence from DG DWER to Env Min	Overall	Ongoing	C	Following a site visit to the TANPF by DWER in March 2018, the Director General of DWER confirmed in correspondence to the Minister for Environment that 'contemporary best practice pollution control technology has been incorporated into the TANPF'. (refer to Attachment 5-1)  The correspondence also noted that toward the end of commissioning the stack was achieving best practice stack emission concentrations under normal operating conditions.



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			Operation Air Quality and Monitoring Management (OAQMM) Plan for MINISTER approval. Written correspondence.					
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.	Overall	Ongoing	NC	<p>For the reporting period 8 July 2017 to 7 July 2018 air quality monitoring was not implemented as noted in the TANPF Air Quality Management Plan (AQMP) Doc. No. 0086269 February 2013 (as approved by the CEO DWER).</p> <p>Background information below provided via conversation with Susan Giles: With completion of commissioning 15 September 2017, the TAN Plant effectively became operational, though operations have only progressed intermittently since that date. As noted in the 2017 CAR for this condition (refer to Attachment 5-2(1)) a request for variation to the required implementation of the AQMP was approved by OEPA on 22 December 2016, with the intention that post construction air quality monitoring would be carried out as described within the "Operational Monitoring" section in the approved Plan. Air quality monitoring has subsequently been implemented in line with the AQMP approved by DEE 15 September 2017 as part of the Operational Environmental Management Plan (OEMP) (refer to section 13.4.7 of Attachment 5-2(2)). Implementation commenced with commissioning and monitoring has continued through the current CAR period.</p> <p>It is further intended that the AQMP will be reviewed and revised upon issuance of the Operating Licence. The Operating Licence was issued 29 June 2018 (Refer to Attachment 5-2(3)), and the AQMP has been progressively reviewed and updated since that date with the intended submission to DEE following submission of the next ACR in October 2018.</p> <p>YPN's current monitoring commitments are outlined in Attachment 5-2(4)) with air quality monitoring locations as per DEE approval shown in Attachment 8-3(1). Both Attachments are extracts from YPN's Monitoring Reporting and Data Schedule Rev 2.</p> <p>Monitoring has continued since issue of the Operating Licence with the first monitoring report against compliance with the OEMP (and AQMP) due to be submitted to the DEE 6 October 2018. The report will inform updates</p>



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								to trigger levels contained in the AQMP.
870:M6-1	Rehabilitation	<p>The proponent shall undertake rehabilitation to achieve the following outcomes:</p> <ol style="list-style-type: none"> <li>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;</li> <li>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);</li> <li>3. Areas not currently supporting native vegetation shall be rehabilitated to the original land use or a use approved by the CEO;</li> <li>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;</li> <li>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</li> <li>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.</li> </ol>	<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>Operational Environmental Management Plan</p> <p>Copy of Environmental Inspection checklist (completed)</p>	Overall	Ongoing	C	<p>There has been no change in circumstances with regard to rehabilitation, and there has been no progressive rehabilitation required as all areas related to establishing the TAN remain in use.</p> <p>With the completion of construction and transition into operations, an Operational Environmental Management Plan has been prepared that includes an objective to minimise adverse impacts to vegetation communities with performance targets related to not introducing any new species of weeds to the TANPF and not spreading any existing weeds within the TANPF (refer to Section 14.2.3 of Attachment 5-2(2)).</p> <p>Weed surveys have been conducted by an independent botanist in December 2016 and April 2017. The April survey was completed as a report in September 2017 (refer to Attachment 6-1(2)).</p> <p>One new weed (two plants) was recorded in the April 2017 survey. These plants were removed.</p> <p>Ongoing weed surveys will be conducted to verify effectiveness of weed management and presence of new species.</p> <p>Weeds are monitored as part of the routine weekly environmental inspections (Refer to Attachment 6-1(1)). The reported presence of weeds triggers weed spraying as a control, as noted in the attached example inspection.</p>
870:M6-2	Rehabilitation	<p>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.</p>	<p>Prepare an Operation Terrestrial Vegetation and Flora Management (OTVFM) Plan for MINISTER approval.</p> <p>Implement the OCTVFM Plan.</p> <p>Prepare an Operation Weed Management (OWMP) Plan for MINISTER approval.</p> <p>Implement the OWM Plan.</p> <p>Written Correspondence.</p>	N/A	Post-decommissioning	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.	NR	<p>There has been no change in circumstances with regard to rehabilitation, and there has been no progressive rehabilitation required as all areas related to establishing the TANPF remain in use</p>
870:M7-1	Fauna	<p>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</p>	<p>Employ structures and apparatus to deter birds from entering the contaminated and clean ponds.</p> <p>Seek advice from DEC.</p>	<p>CAR.</p> <p>Bird deterrent methodology – as agreed by DPaW</p> <p>Copy of Environmental Inspection checklist (completed)</p>	Overall	Ongoing	PNC	<p>Bird deterrent systems have previously been assessed by Department of Parks and Wildlife and the preferred option agreed for implementation (Attachment 7-1(1)). Previous audits have noted this as implemented and maintained (refer to Attachment 5-2(1)).</p>





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								<p>however at the time of this audit, inspection of 6 ponds on the TANPF site showed the following:</p> <ul style="list-style-type: none"> <li>- Pond 1 had bird deterrent wires in place at approximate 5m spacings as per configuration agreed with DEC (DWER)</li> <li>- Pond 2 was drained and undergoing maintenance, some bird deterrent wires were in place</li> <li>- Pond 3 had an insufficient number of bird deterrent wires in place. Remnants of deteriorated wires were observed</li> <li>- Pond 4 had no bird deterrent wires in place Remnants of deteriorated wires were observed</li> <li>- Pond 5 had no bird deterrent wires in place Remnants of deteriorated wires were observed</li> <li>- Pond 6 had bird deterrent wires in place at approximate 5m spacings as per configuration agreed with DEC (DWER)</li> </ul> <p>Previously the bird deterrent wires were checked as part of environmental inspections (refer to Attachment 6-1(1)), with maintenance requirements then reported to operational staff. However, this has not occurred more recently due to there being conflicting priorities during the plant shut-down and some ponds undergoing maintenance..</p> <p>At the time of audit, the process for repairing the bird deterrent systems had been initiated with bird wire provided to operational staff and a work request issued to have bird deterrent systems reinstated as per requirements (refer to Attachment 7-1(2)).</p> <p>It is recommended that future maintenance of the bird deterrent wires be incorporated into the routine operational maintenance requirements with environmental inspections for oversight as opposed to being the trigger for maintenance to occur.</p>
870:M7-2	Fauna	During construction of the TAN Plant 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	Implement the Construction Terrestrial Fauna Management (CTFM) Plan for MINISTER approval. Report on Fauna Found.	N/A	Pre-construction Construction	Ongoing Fauna Found Report Within 14 days	CLD	As noted in previous CAR (2017), construction was completed in February 2016, well outside this reporting period. No further construction works have been conducted during this reporting period that resulted in excavation of trenches or construction-related voids



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		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 sulphate soils and water in acid sulphate 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 TAN Plant site boundary to the CEO.						
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 TAN Plant site and in surrounding areas.	Undertake Hydrogeological Studies.	N/A	Pre-construction	Ongoing	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017
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.	N/A	Pre-construction	Ongoing	CLD	As noted in the previous CAR (2017), construction was completed February 2016 and no construction activities required dewatering. There have been no further construction activities which would require groundwater dewatering.
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.	Overall	After outcomes of the hydrogeological studies	C	MW1 – MW5 have been installed on the TANPF site as approved by DWER. There have been 11 new monitoring wells installed during the reporting period as noted below: MW6, MW7 US2 DS1 - DS8 The location of monitoring wells are shown in Attachment 8-3(1), an extract from YPN's Monitoring Reporting and Data Schedule Rev 2. The additional wells have been installed in response to a 2017 spill of liquid ammonium nitrate solution (ANSol) to the north of pond 4 and a contaminant leakage from pond 2 (both reported under section 72) Golders has been contracted to conduct preliminary environmental risk assessments, hydrogeological conceptual site models and continuing investigations into the contamination events, including associated reporting in response to these events. Monitoring of MW1 – MW5 is ongoing as per



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								M8-4 below with reporting to DWER 6 monthly, Most recent report was submitted in April 2018 (refer to Attachment 8-5(3)).
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 monitoring reports, records.	Overall	Every six months	C	During the reporting period groundwater monitoring was conducted twice, in September 2017 and March 2018. Both sets of results were compared to the groundwater monitoring trigger values and reported to DWER.  The 16 September 2017 sampling results were received on 5 October and reported to DWER on 11 October 2017 (Attachment 8-5(5) and 8.5(2)).  The 13 March 2018 sampling results were received on 29 March and reported DWER on 5 April 2018 (Attachment 8-5(3) and 8.5(4)).
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.	Overall	Within 7 days of the exceedance.  Monitoring results biannually, or a frequency defined by CEO	C	Groundwater monitoring was undertaken on 12 September 2017 with laboratory results received 5 October 2017 (refer to Attachment 8-5(5)). The report was provided to DWER 11 October 2017 (refer to Attachment 8-5(1) and 8-5(2)), within the 7-day reporting requirement of MS 8-5.  Report provided to DWER contained relevant information required by MS8-4 including: <ul style="list-style-type: none"> <li>- Details of groundwater monitoring results including exceedances</li> <li>- Evidence which allows determination of the cause of exceedance (reference to unplanned release events reported under Section 72 of the EP Act)</li> <li>- Details of actions taken in response to the exceedances (in response to the unplanned releases)</li> </ul> Groundwater monitoring was undertaken on 13 March 2018 with laboratory results received 29 March 2018. The report was provided to DWER 5 April 2018, within the 7-day reporting requirement of MS 8-5 (refer to Attachment 8-5(3) and 8-5(4)).  Yara have implemented a Laboratory Information Management System (LIMS) to assist with managing process and information associated with groundwater monitoring.  The LIMS system provides a comprehensive online system which allows for planning of groundwater monitoring events; managing the shipping of samples to laboratories and COC information; receipt of results with alerts against any exceedance of recorded trigger



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								levels; and the maintenance of all monitoring information.
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.	Overall	Biannually, or a frequency defined by CEO	C	Groundwater Monitoring Reports for the monitoring period are publicly available at <a href="https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/">https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/</a>
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.	Pre-construction	Ongoing	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017
870:M9-2	Acid Sulphate Soils	In the event that acid sulphate soils are disturbed during construction of the TAN Plant, 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 sulphate soils and water in acid sulphate soil landscapes (DEC, 2009) and any subsequent revisions.	Preparation of Acid Sulphate Soils (ASS) Management Plan, if required.	ASS Reports.	Construction	After ASS are disturbed	NR	Noted as not required (NR) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017 Circumstances have not changed during this reporting period, and no acid sulphate soils have been disturbed.
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.	De-commissioning	Prior to undertaking ground-disturbing activities	CLD	Noted as closed (CLD) in the DWER Compliance Audit Report 1379 (Ref: CA01-2013-0018-) dated 21 September 2017
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.	De-commissioning	At least six months prior to date of closure	NR	The TAN Plant is anticipated to operate for a period in excess of 20 years.



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## Appendix 2 – Schedule 1 Compliance Assessment

Schedule 1 of MS870 describes the key proposal characteristics of the approved TANPF, outlines the authorised extent of production and delineates the authorised development envelope and disturbance footprint associated with construction of the plant. The Schedule has been amended via a Section 45C change to the proposal on 7 June 2017. Modifications made to the Compliance Assessment of Key Characteristics Table (as shown in Table 5) were:

- decrease the development envelope (area of project lease) from 79 to 48.77 hectares (ha);
- decrease the disturbance footprint from 35 to 33.11 ha;
- remove bagged and bulk TAN storage capacity; and
- update figures 1 and 2 and delineation coordinates.

Condition M1-1 of MS870 requires that the TAN Plant shall be implemented as documented and described in Schedule 1 of MS870. **Error! Reference source not found.** documents the assessment of compliance against the key characteristics of the TAN Plant.

**Table 5 Compliance Assessment of Schedule 1**

Requirement		Status	Further Information
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.		C	The TANPF has been implemented in accordance with all elements of Schedule 1.
Element	Authorised Extent		
General			
Technical ammonium nitrate production facility (TANPF) capacity	350,000 tonnes of technical ammonium nitrate (TAN) per annum.	C	TANPF has not been in operation for much of the reporting period, performance will be more closely verified during operations and the next CAR
Development Envelope	48.77 ha	C	Development envelope area revised to reflect the actual finished boundary of the TANPF.
Disturbance Footprint	33.11 ha	C	Disturbance footprint revised to reflect the final area disturbed within the development envelope, i.e. 33.11 ha.
Main Process Units			
Nitric acid Plant	Capacity – 760 tonnes per day.	C	TANPF has not been in operation for the
Ammonium nitrate	Capacity – 965 tonnes per day.	C	



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Requirement		Status	Further Information
solution Plant			majority of the reporting period as turn around and maintenance was ongoing Performance will be closely monitored during operations and verified during the next CAR period.
TAN prilling Plant	Capacity – 915 tonnes per day.	C	
Storage, loading, and transport			
Liquid ammonia pipeline between the TAN Plant and the adjacent YARA Pilbara Fertilisers Pty Ltd (YPFPL)	710 meters long.	C	
Wastewater discharge pipeline	Connecting the TAN Plant to the Water Corporation facility	C	
Outputs			
Nitrogen oxides (NO <sub>x</sub> )	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.	C	TANPF has not been in operation for the majority of the reporting period as turn around and maintenance was ongoing Performance will be closely monitored during operations and verified during the next CAR period
Nitrous oxide (N <sub>2</sub> O)	Up to 163.7 t/yr, 5.5 g/s.	C	
Carbon monoxide (CO)	Up to 41 t/yr, 1.3 g/s.	C	
Methane (CH <sub>4</sub> )	Up to 17.8 t/yr, 0.6 g/s.	C	
Ammonia (NH <sub>3</sub> )	Ammonium nitrate prilling plant “common stack” - Refer to Condition 5. Nitric acid Plant stack - up to 0.02 g/s.	C	
Particulate matter [as total suspended particulates (TSP)]	Ammonium nitrate prilling plant “common stack” - Refer to Condition 5.	C	
Sulphur dioxide (SO <sub>2</sub> )	Trace.	C	
Carbon dioxide (CO <sub>2</sub> ) [produced]	Up to 532.6 t/yr, 17.8 g/s.	C	
Total greenhouse gas emissions	Approximately 84,451 tonnes of CO <sub>2</sub> -e per year.	C	
Greenhouse gas intensity	Approximately 0.241 tonnes of CO <sub>2</sub> -e per tonne of TAN.	C	
Solid waste	Up to 120 kilograms per day (organic matter from the off-specification prills).	C	



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### Appendix 3 – Register of Documents and Records Reviewed

- [1] MS870 Technical Ammonium Nitrate Production Facility (6 July 2011) + Attachment 2 to Ministerial Statement 870 (7 June 2017)
- [2] Letter from Director General DWER to Minister for Environment DWERME0135/18 (dated 29 March 2018)
- [3] Weekly YPF Inspection 26-04-2018
- [4] 2017 Compliance Assessment Report MS870 Technical Ammonium Nitrate Plan (600-200-CAR-YPN-0038 Rev0) 06-10-2017
- [5] DWER Verification Desktop Audit of Ministerial Statement 870 (dated 21-09-2017)
- [6] YARA 650-200-PLN-YPN-0001 Operations environmental management plan
- [7] YARA 500-200-PLN-YPF-0001 YPN Nitrates Processing Facility Decommissioning Environmental Management Plan
- [8] YARA Technical Ammonium Nitrate (TAN) Plant – Burrup Peninsula – Weed Survey (September 2017)
- [9] YARA Bird Deterrent Systems Assessment Report
- [10] Email - DPAW Bird Deterrent System approval
- [11] OEPA - CAP approval letter - Statement 870 (Ref: A533490OEPA2011/000430)
- [12] TAN Burrup Project Compliance Assessment Plan (MS870) (Ref: 2-250-329-PRO-TRE-0104)
- [13] Licence L7997/2002/11a
- [14] Email from YPN to DWER submitting groundwater monitoring results (20171011)
- [15] YARA 200-200-LET-DWER-0003 YPN 6-monthly Groundwater Monitoring Results (Sept 2017 – submitted to DWER 20171011)
- [16] Report of Examination (Groundwater monitoring) from Chem Centre (received 20171005)
- [17] Transmittal No. 0164 from YPN to DWER submitting groundwater monitoring results Mar 2018 (20170405)
- [18] YARA 200-200-LET-DWER-0006 YPN 6-monthly Groundwater Monitoring Results (Mar 2018 - submitted to DWER 20170405)
- [19] YPN internal email regarding bird wire installation at TAN ponds
- [20] OEPA Letter Technical Ammonium Nitrate Production Facility – AQMP (MS870) Approval (Ref: A574214:OEPA2012/0638-1)
- [21] YPN internal document - Monitoring Reporting and Data Collection Schedule (Rev 2)
- [22] YARA 600-200-ACR-YPF-0005 Rev 0 Addendum – EPBC
- [23] Baseline Air Quality Monitoring Report 2017 (<https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/>)
- [24] Air Quality Monitoring Report (Monthly, December 2017 – July 2018) (<https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-nitrates/>)