



6th December 2016

Our Reference: 200-200-LET-EPA-0010

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

Chief Executive Officer
Attention: Matt Spence, Senior Environmental Officer
Office of the Environmental Protection Authority
Locked Bag 10
East Perth WA 6892

Email: matt.spence@epa.wa.gov.au, compliance@epa.wa.gov.au

Dear Sir,

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

This letter is further to our letter of 1 September 2016 and to inform the OEPA on the outcomes of the latest groundwater monitoring undertaken by Yara Pilbara Nitrates Pty Ltd (YPN) at the Technical Ammonium Nitrate (TAN) plant as required by Conditions 8-4 and 8-5 of Ministerial Statement 870.

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

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

Yara Pilbara Nitrates Pty Ltd

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YPN has reported results to OEPA of previous monitoring regularly, as ongoing monitoring continues to show substantial variation that are considered to be reflective of a natural variability rather than a result of site related potential contamination sources as a result of ongoing construction activities.

Since our correspondence to the OEPA in September 2016, the following has occurred:

- An additional round of monitoring as undertaken on 1 and 3 September 2016 at MW1, MW2, MW3 and MW5. Key results are:
 - Total Nitrogen values at MW1 (12,000µg/L), MW5 (5,700µg/L) as well as MW2 (14,000µg/L) have exceeded the trigger value (5,610µg/L).
 - Total alkalinity value at MW3 (598mg/L) is slightly higher than the trigger value (561mg/L) and is within the range recorded at this bore since April 2015 (553-598mg/L)
- New sampling equipment has been procured and commissioned enabling sampling of MW4 to recommence.
- A scheduled 6-monthly round of monitoring of all monitoring wells was undertaken on 22 November 2016. Key results are:
 - Total Nitrogen values at MW1 (12,000µg/L), MW2 (12,000µg/L) MW5 (5,800µg/L) have exceeded the trigger value (5,610µg/L).
 - Total alkalinity value at MW3 (564mg/L) and MW5 (630mg/L) is slightly higher than the trigger value (561mg/L).
 - Total manganese value at MW4 (1.4mg/L) has exceeded the trigger value (0.242mg/L), but is lower than a previously recorded maximum in October 2014 (3.29mg/L).
- Investigation into potential sources of the elevated Total Nitrogen level is continuing. MW1 is at the upgradient side of plant site and samples groundwater that flows onto the TAN plant site. In accordance with Notice of Desktop Audit of Statement 870 (dated 21 November 2016) results of investigations will be provided to OEPA by 31 January 2017.

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

Yours Sincerely,

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

Brian HOWARTH

HESQ Manager

Yara Pilbara Nitrates

