



**SANDY RIDGE**  
**Compliance Report No. 5**  
**EPBC 2015/7478**

*Prepared for*  
**Australian Government**  
**Department of Climate Change,**  
**Energy, the Environment and Water**

## Prepared by

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## ABBREVIATIONS

ACR	Annual Compliance Report
ADG Code	Australian Dangerous Goods Code
Cth	Commonwealth
CEO	Chief Executive Officer of the Department of Water and Environmental Regulation, responsible for the administration of section 48 of the <i>Environmental Protection Act 1986</i> or their delegate
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DGMMP	Deep Groundwater Monitoring and Management Plan
DSRS	Disused Sealed Radioactive Source
DWER	Department of Water and Environmental Regulation
EMP	Environmental Management Plan
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EPBC 2015/7478	EPBC Approval dated 7 January 2019
EP Act	<i>Environmental Protection Act 1986</i>
GME	Groundwater Monitoring Event
IBC	Intermediate Bulk Container
LMMP	Leachate Monitoring and Management Plan
LLW	Low-Level Radioactive Waste
MS 1078	Ministerial Statement 1078
NEMP	National Environmental Management Plan
NEPM	National Environment Protection Measure
PFAS	Per- and poly- fluoroalkyl substance
Tellus	Tellus Holdings Limited
The Department	Department of Climate Change, Energy, the Environment and Water
The Facility	The Sandy Ridge Facility
tpa	Tonnes per annum
WA	Western Australia

## DECLARATION OF ACCURACY

<b>Project Name</b>	Sandy Ridge Facility
<b>Approval Holder</b>	Tellus Holdings Limited
<b>EPBC Reference</b>	2015/7478
<b>Approved Action</b>	Construct and operate an open-cut kaolin clay mine, arid near surface geological waste repository with the mine voids, and associated infrastructure for the storage, treatment, recovery and permanent isolation (disposal) of hazardous and intractable waste (including low level radioactive wastes), approximately 75 km north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia [As described in EPBC referral 2015/7478 subject to the variations of the action accepted by the Minister under section 156B on Friday, 22 December 2017 and Friday, 9 November 2018].
<b>Reporting Period</b>	7 July 2023 to 6 July 2024
<p><b>Declaration of Accuracy</b></p> <p>In making this declaration, I am aware that sections 490 and 491 of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.</p>	
Signature of Authorised Reporting Officer	
Name of Authorised Reporting Officer	Pascoe Murison
Position of Authorised Reporting Officer	General Manager Operations
Organisation Name	Tellus Holdings Limited
Organisation ACN	138 119 829
Organisation ABN	97 138 119 829

## EXECUTIVE SUMMARY

This report has been prepared in accordance with Part B, Condition 9 of EPBC 2015/7478 that requires a Compliance Report to be prepared for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. This Compliance Report has been prepared in accordance with the requirements of the Annual Compliance Report Guidelines (Commonwealth of Australia, 2014). The reporting period for this Compliance Report has been defined as from 7 July 2023 to 6 July 2024.

Permanent disposal of waste to the waste cell commenced on 23 March 2021. During the reporting period the facility was fully operational.

Tellus’s overall compliance status with EPBC 2015/7478 for the reporting period is summarised below.

Number of Compliant Audit Elements	Number of Non-compliant Audit Elements	Number of Not Applicable Audit Elements
17	3	7

Tellus identified the following 3 non-compliant audit elements with EPBC 2015/7478 during the reporting period. The first non-compliance was associated with the temporary storage of certain liquid and radiological wastes in excess of the 12-month maximum temporary waste storage limit. This was non-compliant with Part A, Condition 1 of EPBC 2015/7478, which specifies that *‘When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1 [of MS 1078], unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.’*

Tellus has been working to ensure permanent disposal of the Liquid Chemical Waste and Disused Sealed Radioactive Source (DSRS) waste at Sandy Ridge as soon as practicable, pending approvals and construction processes. A section 44 amendment to Ministerial Statement 1078 has been assessed by the Western Australian EPA (Report 1767, 04/06/2024). Under the EPA’s proposed new Ministerial Conditions, the condition for maximum temporary surface storage time has been amended from “Up to 12 months” to “Up to 12-months, or as agreed by the CEO.”

The new Ministerial Conditions are expected to be implemented in the second half of 2024. Once implemented, Tellus will consult with DWER to seek an exemption from the CEO for the 12-month temporary storage limit for waste, where required. The second geological repository, Cell 2 is currently in development and construction is expected to be completed in September 2025. Upon completion of Cell 2, DSRS radiological waste will be placed in a batch at the bottom of the Cell 2 and encapsulated in concrete in accordance with the Radiological Safety Case. Tellus therefore anticipates full compliance with EPBC2015/7478 Conditions within the next 2 years.

The other non-compliant audit elements (Conditions B10 and B11) were associated with a failure to report the above non-compliance to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and failure to inform DCCEEW of the corrective action to address the non-compliance.

It is noted that Tellus has pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period.

A summary of the status of all conditions of EPBC 2015/7478 is outlined within the Compliance Assessment Audit Table presented in Appendix A.



# 1 INTRODUCTION

This Compliance Report has been prepared to document compliance with the Australian Government’s Department of Climate Change, Energy, the Environment and Water (DCCEEW or the Department) approval EPBC 2015/7478 issued in accordance with Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The approval allows Tellus Holdings Ltd (Tellus) to construct and operate a dual open cut kaolin clay mine and arid near-surface geological waste repository known as the Sandy Ridge Facility (the Facility); licenced to accept Class IV and Class V waste.

## 1.1 Background

In accordance with the requirements of Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) the Australian Government granted approval to Tellus Holdings Ltd (Tellus) to construct and operate an open-cut kaolin clay mine, arid near-surface geological waste repository within the mine voids, and associated infrastructure on 7 January 2019. The approval (Ref: EPBC 2015/7478) allows for the treatment, recovery and permanent isolation (disposal) of hazardous and intractable wastes (including low level radioactive wastes). The Sandy Ridge Facility (the Facility) is located approximately 75 kilometres north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia.

The Facility was granted WA government Ministerial Approval on 26 June 2018 (Ministerial Statement 1078).

The Facility is approved to mine up to 280,000 tonnes per annum (tpa) of kaolin clay with the mining voids used for the permanent isolation of wastes, including hazardous and intractable wastes, and LLW. The Facility is currently licenced to receive up to 280,000 tpa of Class IV and Class V waste for approximately 25 years; however, a Proposal has been submitted by Tellus (Assessment number 2309 – Sandy Ridge Facility – Alignment of Gate Waste Acceptance Tonnage) to increase the tonnage of waste accepted at the Sandy Ridge Facility from the current Ministerial limit of 100,000tpa to align with the DWER licence prescribed limit of up to 280,000 tpa.

A Regional Location plan and a Site Plan are presented as Figure 1-1 and Figure 1-2 at the end of this Section.

## 1.2 Purpose and Scope

This Compliance Report is submitted in accordance with the requirements set out in Part B, Condition 9 of EPBC 2015/7478, which requires the following:

### *Condition 9 – Annual compliance reporting*

*The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:*

- a) Publish each compliance report on the website with 60 business days following the relevant 12 month period;*
- b) Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;*
- c) Keep all compliance reports publicly available on the website until this approval expires;*
- d) Exclude or redact sensitive ecological data from compliance reports published on the website; and*
- e) Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department with 5 business days of publication.*

The reporting period for this Compliance Report has been defined as from 7 July 2023 to 6 July 2024 and is based on Tellus' assessment of compliance with the conditions of EPBC 2015/7478.

### 1.3 Report Methodology

This Compliance Report has been prepared in accordance with the requirements of the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014).

### 1.4 Retention of Compliance Reports

Tellus will retain Compliance Reports for the life of the approval in accordance with Part B, Condition 9-c of EPBC 2015/7478 and will continue to implement the proposal until the Minister has determined all conditions have been satisfactorily addressed.

### 1.5 Public Availability of Reports

Tellus will make this Compliance Report publicly available in accordance with Part B, Conditions 9-a and 9-c of EPBC 2015/7478. The 2022-23 report (#4) was published on the Tellus website on 28 September 2023.

In accordance with Part B, Condition 9-d of EPBC 2015/7478 Tellus will exclude or redact any sensitive ecological data from Compliance Reports published on the website. Where sensitive ecological data has been excluded or redacted, Tellus will, in accordance with Part B, Condition 9-e of EPBC 2015/7478 submit the full report to the Department within five business days of publication.

No sensitive ecological data has been excluded or redacted from this Compliance Report.

### 1.6 New Environmental Risks

No new environmental risks were identified during the reporting period.

### 1.7 Format of the Report

The format of this Compliance Report is as follows:

- Authorised Reporting Officer's endorsement, including Tellus' declaration of accuracy.
- Executive Summary.
- Section 1 is an introduction and provides the scope and nature of the audit.
- Section 2 briefly describes the implementation status of the Project during the reporting period.
- Section 3 summarises the compliance issues identified and provides corrective and preventative measures to improve the environmental performance at the Facility.
- Section 4 specifies the limitations of the report.
- Section 5 provides references used in this Compliance Report.

Appendix A presents the Audit Table, a tabulated review of the audit results against the requirements of EPBC 2015/7478.

This Compliance Report provides a summary of findings including details of non-compliances identified during the audit and recommended actions to improve compliance status.



Figure 1-1 Sandy Ridge Facility Regional Location.

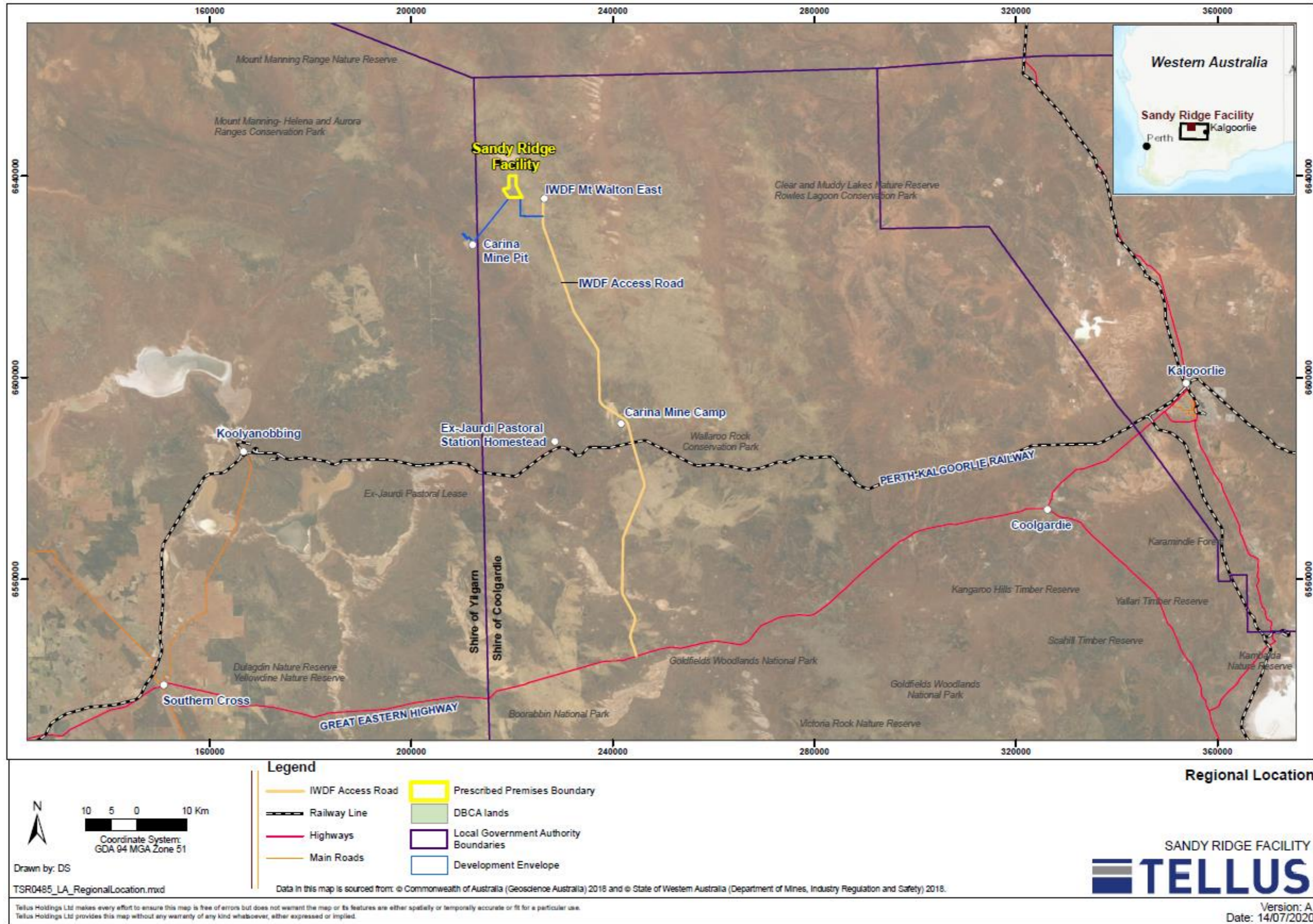
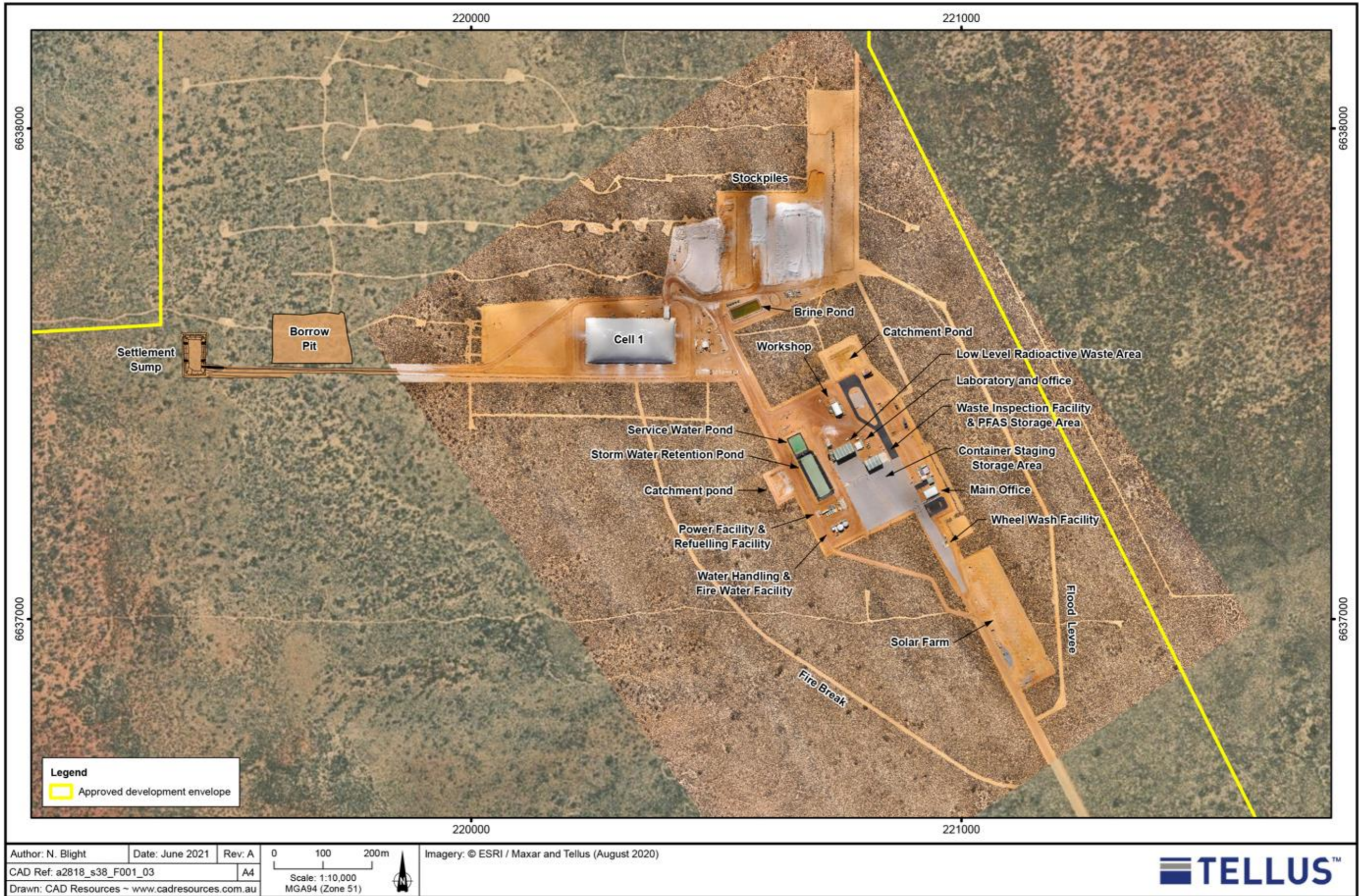




Figure 1-2 Sandy Ridge Facility Site Plan.





## 2 IMPLEMENTATION STATUS

Table 2-1 summarises the status of Commonwealth and State project approvals.

**Table 2-1 – Project Approvals**

Approvals	Issued	Finish
Ministerial Statement 1078 - Proposal to construct and operate a dual open cut kaolin clay mine and a near-surface geological waste repository accepting Class IV and Class V waste, approximately 75 kilometres northeast of Koolyanobbing.	27/07/2018	
EPBC 2015/7478 – Action - Construct and operate an open-cut kaolin clay mine, arid near-surface geological waste repository within the mine voids, and associated infrastructure for the storage, treatment, recovery and permanent isolation (disposal) of hazardous and intractable wastes (including low level radioactive wastes), approximately 75 km north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia [As described in EPBC referral 2015/7478 subject to the variations of the action accepted by the Minister under section 156B on Friday, 22 December 2017 and Friday, 9 November 2018].	07/01/2019	31/12/2048
Section 45C – Attachment 1 to MS 1078 – Changes: <ul style="list-style-type: none"> <li>• Amend the development envelope from 1004.2 hectares to 1061 hectares to allow for relocation of groundwater abstraction infrastructure.</li> <li>• Installation of a 1.5 megawatt solar farm for power generation.</li> <li>• Addition of two stormwater sumps on internal roads in the infrastructure area.</li> <li>• Reduction in the width of internal roads to the Class II landfill and along the groundwater pipeline to Carina Iron Ore Mine.</li> <li>• Addition of an access road adjacent to Mt Dimer Road.</li> <li>• Addition of a flood levee.</li> <li>• Change in orientation and size of accommodation camp.</li> </ul>	05/02/2019	
Ministerial Statement 1152 (Condition 13-11 Financial Assurance Requirements)	24/09/2020	
Major approvals, permits and licences from the Australian, WA and Local Government required to temporarily store waste on-site	-	29/06/2020
Site Registration – Controlled Waste Facility No. 39106650	-	21/01/2020
W6305/2019/1 – Works Approval #2 – to authorise the construction of the temporary waste storage area.	20/12/2019	19/12/2022
W6308/2019/1 – Works Approval #3 – to authorise the construction of the main processing and treatment infrastructure of the Facility.	07/02/2020	06/02/2023
Operating Licence – Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) – L9240/2020/1	29/06/2020	28/06/2040
W6700/2022/1 – Works Approval to construct three additional waste cells, to be known as Cell 2, Cell 3 and Cell 4.	13/12/2022	13/12/2027
Licence L9240/2020/1 amendment – Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) – L9240/2020/1.	01/06/2023	28/06/2040

Registration R2498/2019/1 was granted in November 2019 for the operation of the wastewater treatment plant, and registration R2501/2020/1 was granted in February 2020 for the premises domestic putrescible landfill.

## 2.1 Notification of Commencement of Action

On 18 July 2019 Tellus notified by email the Department’s Post Approvals Section that commencement of the action occurred on 7 July 2019. The Department acknowledged the notification by return email.

## 2.2 Construction

Contract completion occurred on 09 October 2020, with a 12 month defects liability period that ended on 09 October 2021. No construction work was conducted during the reporting period.

## 2.3 Operations

Infrastructure at Sandy Ridge is depicted in Fig 1-2 and consists of:

- Mine infrastructure, including stockpile area, storage building, laboratory, mining offices, laydown yard, stormwater storage tanks (4), brine pond and settlement pond.
- Waste infrastructure including an inflatable dome waste cell cover, temporary waste storage areas (East Yard, PFAS (Per- and poly- fluoroalkyl substance) contaminated waste storage area, low level radiation waste warehouse/ liquid waste unloading area, low level radiation waste, liquid waste and sludge storage yard), temporary waste storage area stormwater drains and retention pond, waste inspection area, waste immobilisation plant workshop and laydown yard, flammable goods store, radiation scanner and waste laboratory.
- Other infrastructure including an accommodation camp, access roads, water pipelines, wastewater treatment plant, flood levee, and a putrescible landfill. The putrescible landfill services the accommodation camp and office. Only wastes generated at the Facility will be disposed in this landfill.

The facility accepted its first waste, on 6 July 2020.

During the current reporting period a total of 45,001.27 tonnes (normalised) of controlled (chemical) waste was received on site as detailed in in Table 2-2.

Regarding radiological waste, Sandy Ridge receives unsealed and sealed material. For unsealed waste 3,174.39 tonnes was received during the reporting period as detailed and Table 2-3 below.

Due to their small sizes sealed sourced generally do not have their weights recorded. Each source is individually recorded in the Radioactive Material Storage Manifest; including the radionuclide and its original and calculated activity. A monthly report is provided to the Department of Health on all radioactive material that has been received and disposed of. During the reporting period Sandy Ridge received 435 sealed sources (DSRS).

**Table 2-2 – Controlled waste accepted during reporting period**

Waste Type	Normalised tonnes
A130 – Inorganic cyanide	116.13
B100 – Acidic solutions or acids in solid form	646.57
C100 - Basic (alkaline) solutions or bases (alkalis) in solid form	1,311.61
D110 - Inorganic fluorine compounds (excluding calcium fluoride)	303.69
D120 – Mercury and mercury compounds	779.49
D130 – Arsenic and arsenic compounds	528.54

Waste Type	Normalised tonnes
D200 - Cobalt compounds	18.93
D210 – Nickel compounds	10,178.64
D220 – Lead and lead compounds	1,668.55
D270 - Vanadium compounds	0.82
D300 - Non-toxic salts	9,068.07
D330 – Inorganic sulphides	113.09
E100 - Waste containing peroxides excluding hydrogen peroxide	1.65
E130 - Highly reactive chemicals not otherwise specified	40.85
H100 – Waste from the production, formulation or use of biocides and phytopharmaceuticals	334.89
H110 - Organic phosphorous compounds	4.35
H130 – Organochlorine pesticides	4,652.20
H170 – Waste wood-preserving chemicals	1,668.16
J100 – Waste mineral oils unfit for their intended purpose	36.39
J160 – Waste tarry residues arising from refining, distillation or pyrolytic treatment	2,357.96
M100 – Waste substances and articles containing polychlorinated biphenyls (PCBs)	24.85
M150 – Phenols, phenol compounds including halogenated phenols	0.25
M220 – Isocyanate compounds	20.12
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	7,495.58
N100 - Containers or drums contaminated with residues of a controlled waste	0.03
N120 – Soils contaminated with a controlled waste	3,507.14
N160 - Encapsulated, chemically fixed, solidified or polymerised controlled wastes	15.61
N190 - Filter cake containing a controlled waste	83.56
N205 – Industrial waste treatment plant residues	23.55
<b>Total tonnes received during reporting period</b>	<b>45,001.27</b>

**Table 2-3 – Unsealed radiological waste accepted during reporting period**

Date	Waste Type	Weight (kg)
21/07/2023	237 Bq/g Uranium bearing Resins	988
21/07/2023	Uranium Ore	0.206
21/07/2023	Jar of Sand	0.038
21/07/2023	Jar of Sand	0.04
21/07/2023	Ore	0.056
29/07/2023	O&G waste sludge from Montara FPSO - Jadestone (528 Drums)	144,960
01/08/2023	Various plates, valves, pipes and spools from Process plant	4,580
29/08/2023	Contaminated soil from remediation project	294,680
30/08/2023	LSA, PPE and SCO - Pigging waste	6,000
30/08/2023	LSA, PPE and SCO - Pigging waste	6,000
19/09/2023	Contaminated soil from remediation project	224,480
08/09/2023	Various plates, valves, pipes and spools from Process plant	18,670

10/10/2023	O&G waste sludge from Montara FPSO - Jadestone (Drums)	59,995
25/10/2023	Contaminated soil from remediation project	239,240
25/10/2023	Contaminated soil/sludge from offshore pipeline	1,860
30/11/2023	Contaminated soil from remediation project	418,417
30/11/2023	O&G waste sludge from Montara FPSO - Jadestone (Drums)	15,630
19/12/2023	LSA, PPE and SCO - Pigging waste	12,500
16/12/2023	Contaminated soil from remediation project	192,030
21/12/2023	O&G waste sludge from Montara FPSO - Jadestone (Drums)	54,630
07/01/2024	Contaminated soil from remediation project	67,230
17/01/2024	LSA, PPE and SCO - Pigging waste	640
17/01/2024	LSA, PPE and SCO - Pigging waste	1,080
17/01/2024	O&G waste sludge from Montara FPSO - Jadestone (Drums)	10,860
28/01/2024	Contaminated soil from remediation project	257,040
01/02/2024	Contaminated soil from remediation project	35,150
02/02/2024	Contaminated soil from remediation project	33,390
03/02/2024	O&G waste sludge from Montara FPSO - Jadestone (Drums)	13,630
17/02/2024	Contaminated SCO from Mineral Sands process	11,710
20/02/2024	O&G waste sludge from Montara FPSO - Jadestone (Drums)	19,790
29/02/2024	Contaminated soil from remediation project	156,890
29/03/2024	Contaminated soil from remediation project	171,710
07/04/2024	Contaminated soil from remediation project	59,860
18/04/2024	LSA, PPE and SCO - Pigging waste	2,500
23/04/2024	O&G waste sludge from Montara FPSO - Jadestone (Drums)	18,060
23/04/2024	Contaminated soil from remediation project	275,110
04/05/2024	Contaminated soil from remediation project	33,210
14/05/2024	O&G waste sludge from Montara FPSO - Jadestone (SCO & drums)	22,400
04/06/2024	LLW - Smelter factory bricks	20,370
04/06/2024	LLW - Smelter factory bricks	20,370
06/06/2024	LSA, PPE and SCO - Pigging waste	530
06/06/2024	LLW Water treatment sludges	2,260
19/06/2024	LLW - Smelter factory bricks	15,170
19/06/2024	LLW - Smelter factory bricks	15,170
20/06/2024	O&G waste sludge from Montara FPSO - Jadestone (SCO & SLUDGE)	11,310
22/06/2024	Contaminated soil from remediation project	90,160
01/07/2024	Contaminated soil from remediation project	56,440
02/07/2024	Contaminated soil from remediation project	18,090
<b>Total kg received during reporting period</b>		<b>3,134,790.34</b>

Permanent disposal in the waste cell commenced on 23rd March 2021.

During the reporting period a total of 42,771.50 tonnes of controlled waste was permanently disposed of in Cell 1. Waste permanently disposed of during the reporting period is summarised by waste code in Table 2-4. This included 270.48 tonnes of waste processed through the Waste Immobilisation Plant (WIP).



**Table 2-4 – Permanently disposed waste during reporting period**

Waste Type	Normalised tonnes
A130 – Inorganic cyanide	114.52
B100 – Acidic solutions or acids in solid form	71.71
C100 - Basic (alkaline) solutions or bases (alkalis) in solid form	1,611.24
D110 - Inorganic fluorine compounds (excluding calcium fluoride)	365.60
D120 – Mercury and mercury compounds	782.78
D130 – Arsenic and arsenic compounds	436.49
D210 – Nickel compounds	10,616.18
D220 – Lead and lead compounds	1,760.34
D230 – Zinc compounds	11.49
D270 - Vanadium compounds	0.82
D300 - Non-toxic salts	9,556.27
D330 – Inorganic sulphides	143.60
E100 - Waste containing peroxides excluding hydrogen peroxide	9.61
E130 - Highly reactive chemicals not otherwise specified	3.73
H100 - Pesticides	2.22
H130 – Organochlorine pesticides	2,849.10
H170 – Waste wood-preserving chemicals	1,586.81
J100 – Waste mineral oils unfit for their intended purpose	14.58
J160 – Waste tarry residues arising from refining, distillation or pyrolytic treatment	2,280.31
M100 - Waste substances and articles containing polychlorinated biphenyls (PCBs)	3.39
M220 – Isocyanate compounds	0.83
M270 – Per- and poly- fluoroalkyl substance (PFAS) contaminated materials, including waste PFAS containing products and contaminated containers	7,059.26
N100 - Containers or drums contaminated with residues of a controlled waste	0.03
N120 – Soils contaminated with a controlled waste	3,369.86
N160 - Encapsulated, chemically fixed, solidified or polymerised controlled wastes	13.40
N190 - Filter cake containing a controlled waste	83.87
N205 – Industrial waste treatment plant residues	23.46
<b>Total tonnes of controlled waste disposed of during reporting period</b>	<b>42,771.50</b>

Table 2-5 details the permanently disposed of unsealed radiological waste during the reporting period. This material totalled 2,859.43 tonnes.

Table 2-5 – Permanently disposed of unsealed radiological waste during the reporting period.

Tellus Reference Number	Date Received	Date Disposed	Disposal Permit N	Notes	Origin/Location/Client	Total weight or volume (kg / L)
PO3723001	11/05/2023	31/10/2023	DP-SRF-20231018	3.3 Bq/g Uranium Tailings Waste	Haz Solutions	3500
PO3723002	14/05/2023	31/10/2023	DP-SRF-20231018	3.3 Bq/g Uranium Tailings Waste	Haz Solutions	19000
PO3996001	29/07/2023	06/09/2023	DP-SRF-20230825	O&G waste sludge from Montara FPSO - Jadestone (528 Drums)	Jadestone	144960
PO3998001	01/08/2023	31/10/2023	DP-SRF-20231018	Various plates, valves, pipes and spools from Process plant	Qenos	4580
PO4206001	29/08/2023	17/09/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	294680
PO4110001	30/08/2023	30/11/2023	DP-SRF-20231018	LSA, PPE and SCO - Piggings waste	Zinfra, NSW	6000
PO4206001	19/09/2023	30/09/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	224480
PO3998001	08/09/2023	30/11/2023	DP-SRF-20231018	Various plates, valves, pipes and spools from Process plant	Qenos	18670
PO3996001	10/10/2023	31/10/2023	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	59995
PO4206001	25/10/2023	31/10/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	239240
PO4206001	30/11/2023	30/11/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	418417
PO3996001	30/11/2023	30/11/2023	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	15630
PO4206001	16/12/2023	31/12/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	192030
PO3996001	21/12/2023	30/11/2023	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	54630
PO4206001	07/01/2024	31/12/2023	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	67230
PO4206001	28/01/2024	05/02/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	257040
PO4206001	01/02/2024	05/02/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	35150
PO4206001	02/02/2024	05/02/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	33390
PO3996001	03/02/2024	17/03/2024	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	13630
PO3996001	20/02/2024	17/03/2024	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	19790
PO4206001	29/02/2024	28/03/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	156890
PO4206001	29/03/2024	28/03/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	171710
PO3996001	23/04/2024	30/04/2024	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( Drums)	Jadestone	18060
PO3996001	14/05/2024	06/06/2024	DP-SRF-20231016	O&G waste sludge from Montara FPSO - Jadestone ( SCO & drums)	Jadestone	22400
PO2123001	27/11/2021	08/06/2024	DP-SRF-20240124	LSA & SCO	SGS Malaga, WA	10,500
PO2123001	27/11/2021	08/06/2024	DP-SRF-20240124	LSA & SCO	SGS Malaga, WA	
PO2123001	27/11/2021	08/06/2024	DP-SRF-20240124	LSA & SCO	SGS Malaga, WA	
PO2334001	23/01/2022	08/06/2024	DP-SRF-20240124	Contaminated Soil	Hazrad	19.4
PO2334001	25/01/2022	08/06/2024	DP-SRF-20240124	Contaminated Soil	Hazrad	17.1
PO3413001	23/12/2022	08/06/2024	DP-SRF-20240124	Scantech drums	SA	2500
PO3541001	09/05/2023	08/06/2024	DP-SRF-20231018	6 x thorium alloy frames (metal)	SA Radiation	850
PO3884001	21/07/2023	08/06/2024	DP-SRF-20240124	237 Bq/g Uranium bearing Resins	Tamworth Council	988
PO4266001	25/10/2023	08/06/2024	DP-SRF-20240124	Contaminated soil/sludge from offshore pipeline	Chevron	1860
PO2293001	25/01/2022	13/06/2024	DP-SRF-20240124	Contaminated filters (LNG)	SA Radiation	660
PO2294001	25/01/2022	13/06/2024	DP-SRF-20240124	LSA & SCO Oil and Gas	Radiation Professionals	5965.5
PO2761001	25/04/2022	13/06/2024	DP-SRF-20240124	LSA & SCO piggings waste	Santos via Rusca	10000
PO4206001	07/04/2024	13/06/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	59860
PO4206001	23/04/2024	13/06/2024	DP-SRF-20230829	Contaminated soil from remediation project	Hunters Hill	275110

Table 2-6 summarises the status of compliance with the authorised extent of the proposal (Table 2 of Schedule 1 of MS 1078).

**Table 2-6 – Compliance status of key characteristics, Table 2, Schedule 1 MS 1078**

Requirement		Status	Further Information
When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1, unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.		Non-compliant	The authorised extent of the proposal was exceeded regarding the maximum <b>temporary waste storage time of 12 months</b> during the reporting period.
Key Characteristic	Description		
Mine pit/waste cells	Clearing up to 202.3 hectares of native vegetation within a 1,061 hectare development envelope	Compliant	As of 6 July 2024, a total of 24.69 hectares of native vegetation within the development envelope had been cleared for mine pit/waste cells.
Associated infrastructure	Clearing up to 73.75 hectares of native vegetation with a 1,061 hectare development envelope	Compliant	As of 6 July 2024, a total of 71.03 hectares of native vegetation within the development envelope had been cleared for associated infrastructure.
Class IV & V waste accepted at gate	up to 100,000 tonnes per annum	Compliant	A total of 48,136.06 tonnes (normalised) of waste (the sum of controlled waste and unsealed radiological waste) was received during the reporting period.
Temporary waste storage on surface	up to 15,000 tonnes	Compliant	A cross check of waste received against waste permanently disposed confirmed that the temporary waste storage limit of 15,000 tonnes was not exceeded at any point during the reporting period.
Maximum temporary storage time	up to 12 months	Non-compliant	The 12 month storage requirement was exceeded during the reporting period (see Table 3.3).
Waste (including treated waste) disposed to waste cells	up to 280,000 tonnes per annum	Compliant	A total of 42,771.50 tonnes (normalised) of waste was permanently disposed of during the reporting period.
Water use	up to 0.18 gigalitres (180,000m <sup>3</sup> ) per annum	Compliant	A total of 0.023 gigalitres (22,581 m <sup>3</sup> ) was used on site during the reporting period.

## 2.4 Decommissioning

No decommissioning activities were conducted during the reporting period.

### 3 DETAILS OF FINDINGS

#### 3.1 Compliance Status

Table 3-1 provides a summary of the performance categories in respect to the compliance status for each requirement of EPBC 2015/7478 as defined in *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014, p.9).

**Table 3-1 – Compliance status terms**

Compliance Status Term	Definition
Compliant	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of 'non-compliance' has been given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	A designation of 'not applicable' has been given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

The overall status of compliance with the audit elements of EPBC 2015/7478 Conditions for the reporting period is summarised in Table 3-2.

Requirements considered non-compliant are summarised in Table 3-3. The table includes a discussion of the compliance status and corrective and preventative actions for improvement where appropriate.

The comments column provides evidence relevant to each requirement. Where considered relevant, observations have been made regarding specific compliance issues.

**Table 3-2 – Overall compliance assessment of EPBC 2015/7478**

Number of Audit Elements Compliant	Number of Audit Elements Non-compliant	Number of Audit Elements Not Applicable
17	3	7

**Table 3-3 – Summary of EPBC 2015/7478 non-compliant conditions**

Condition No.	Condition	Compliance Status	Comments and corrective actions
A.1	When implementing the proposal, the proponent shall not exceed the authorised extent of the proposal as defined in Table 2 of Schedule 1 [of MS 1078], unless amendments to the proposal and the authorised extent of the proposal have been approved under the EP Act.	Non-compliant	<p>The extent of the proposal, as defined in Table 2 of Schedule 1 was exceeded regarding the maximum temporary storage time of 12 months during the reporting period. It is noted that Tellus has pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period.</p> <p>Tellus has been working to ensure permanent disposal of the Liquid Chemical Waste and DSRS waste at Sandy Ridge as soon as practicable, pending approvals and construction processes:</p> <ul style="list-style-type: none"> <li>• The Pilot Acid Neutralisation Plant (ANP) is currently being constructed by an offsite manufacturer. Installation was expected to occur in Dec 2024, however following recent consultation with DWER, Tellus now expects regulatory approval will delay installation until 2025. Once operational, treatment and disposal of Nitrosyl Sulphuric Acid will commence.</li> <li>• The Air Pollution Control Residue (APCr) Handling Plant is also under construction and is expected to be commissioned by October 2024. Liquid from dust suppression will initially be sourced from site generated water such as Brine from the Reverse Osmosis Plant, Stormwater and water from sumps. Once the APCr plant is fully operational, Tellus will consult with DWER regarding a licence amendment to authorise processing of liquid wastes such as PFAS Liquid and Pesticides.</li> <li>• The second geological repository, Cell 2 is currently in development. Construction is expected to be completed in September 2025. Upon completion of Cell 2, DSRS radiological waste will be placed in a batch at the bottom of the Cell 2 and encapsulated in concrete in accordance with the Radiological Safety Case.</li> </ul> <p>A section 44 amendment to Ministerial Statement 1078 has been assessed by the Western Australian EPA (Report 1767, 04/06/2024). Under the EPA’s proposed new Ministerial Conditions, the condition for maximum temporary surface storage time has been amended from “Up to 12 months” to “Up to 12-months, or as agreed by the CEO.”</p> <p>The new Ministerial Conditions are expected to be implemented in the second half of 2024. Once implemented, Tellus will consult with DWER to seek an exemption from the CEO for the 12-month temporary storage limit for waste, where required. Through</p>

Condition No.	Condition	Compliance Status	Comments and corrective actions
			the above remedial actions, Tellus anticipates full compliance with EPBC2015/7478 Conditions within the next 2 years.
B10	<p>The <b>approval holder</b> must notify the <b>Department</b> in writing of any: <b>incident</b>; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two <b>business days</b> after becoming aware of the incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> <li>a) the condition which is or may be in breach; and</li> <li>b) a short description of the incident and/or non-compliance.</li> </ul>	Non-compliant	<p>As identified above in A1, a non-compliance against Condition 1 of EPBC 2015/7478, regarding waste being stored for greater than 12 months occurred during the reporting period. Tellus is non-compliant with Condition B10 because each individual waste batch has not been reported within 2 business days of the batch reaching the 12-month limit. This is because Tellus considers that there have been no impacts associated with the non-compliance and corrective actions are the same as reported in the previous ACR. Reporting of the non-compliance for the current reporting period is through submission of this ACR.</p> <p>It should be noted that Tellus has pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period.</p>
B11	<p>The <b>approval holder</b> must provide to the <b>Department</b> the details of any <b>incident</b> or non-compliance with the conditions or commitments made in <b>plans</b> as soon as practicable and no later than 10 <b>business days</b> after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>b) the potential impacts of the incident or non-compliance; and the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>	Non-compliant	<p>As detailed above Tellus has not provided details, corrective actions, potential impacts or remedial actions for each individual waste batch within 2 business days of the batch reaching the 12-month limit.</p> <p>A section 44 amendment to Ministerial Statement 1078 has been assessed by the Western Australian EPA (Report 1767, 04/06/2024). Under the EPA’s proposed new Ministerial Conditions, the condition for maximum temporary surface storage time has been amended from “Up to 12 months” to “Up to 12-months, or as agreed by the CEO.”</p> <p>The new Ministerial Conditions are expected to be implemented in the second half of 2024. Once implemented, Tellus will consult with DWER to seek an exemption from the CEO for the 12-month temporary storage limit for waste, where required.</p> <p>Through the above remedial actions, Tellus anticipates full compliance with EPBC2015/7478 Conditions within the next 2 years.</p>

### 3.2 Environmental Management Plans

Table 3-4 summarises the status of management plans required under EPBC 2015/7478 during the reporting period.

**Table 3-4 – Submitted and approved management plans**

Condition No.	Management Plan	Date Prepared / Revised	Approval Date
A.2.1	Deep Groundwater Monitoring and Management Plan (DGMMP)	15 May 2020	29 May 2020
A.1	Leachate Monitoring and Management Plan (LMMP)	7 May 2020	14 May 2020

The LMMP was approved by the CEO of The Department of Water and Environmental Regulation (DWER) as required by Conditions 9-2 and 9-3 of Ministerial Statement 1078, under the Western Australian Environmental Protection Act, 1986.

At the time of writing, both the DGMMP and LMMP had been updated and submitted to DCCEEW and DWER respectively for comment; however, following Tellus’s application for the *Alignment of Gate Waste Acceptance Tonnage*, the draft Ministerial Statement conditions in EPA Report 1767 (4 June 2024) [19] specifies that Tellus must update the LMMP. Tellus will concurrently update the DGMMP to align with the LMMP and submit to DCCEEW for approval.

Implementation of these plans is discussed in Appendix A.

## 4 LIMITATIONS OF THIS REPORT

This report has been prepared by Tellus Holdings Ltd (Tellus) based on generally accepted practices and standards and information (including site conditions) available/present when it was prepared (September 2024).

No other warranty, expressed or implied, is made as to the professional advice included in this Report. This report was prepared in accordance with the purpose outlined in EPBC 2015/7478, dated 7 January 2019. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. Where this report indicates that information has been provided to Tellus by third parties, Tellus has made no independent verification of this information except as expressly stated in the report. Tellus assumes no liability for any inaccuracies in or omissions to that information.

This Report should be read in full and does not give legal advice. Except as required by law, no third party may use or rely on this report unless otherwise agreed by Tellus in writing. To the extent permitted by law, Tellus expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report.



## 5 REFERENCES

### 5.1 Supporting, verifying information, documentation

<u>[01] Tellus, 2024. Compliance Assessment Report No. 6 2023-2024 Ministerial Statement 1078</u>	Report
<u>[02] Tellus, 2024. Sandy Ridge – Biannual Groundwater Monitoring Event 7. Summary Letter Report, April 2023.</u>	Report
<u>[03] Tellus, Leachate Monitoring and Management Plan, Version E, 7 May 2020, Ref: HS00-1760150200-49173.</u>	Management Plan
<u>[04] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-003. 22November 2022.</u>	Management Plan
<u>[05] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020.</u>	Letter
<u>[06] EMM, 2021. Groundwater Quality Trigger and Threshold Criteria – Sandy Ridge Facility. Report # P200582 RP1 March 2021</u>	Report
<u>[07] Landloch, 2020. Sandy Ridge Project: Baseline soil audit for the facility, Mt. Walton access road and Sandy Ridge Access Rd. October 2020</u>	Report
<u>[08] DWER Environmental Licence L9240/2020/1 (<a href="http://www.dwer.gov.au">www.dwer.gov.au</a>)</u>	Licence
<u>[09] DWER Works Approval W6243/2019/1 (<a href="http://www.dwer.gov.au">www.dwer.gov.au</a>).</u>	Approval
<u>[10] DWER, Letter, 2020, Sandy Ridge Facility Ministerial Statement 1078 Leachate Monitoring and Management Plan Approved, 14 May 2020, Ref: DWERDT280973; DWERT463.</u>	Approval
<u>[11] Tellus 2021. Surface Water Control Operational Procedure SR-08.511, February 2021</u>	Procedure
<u>[12] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm.</u>	Email
<u>[13] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm.</u>	Email
<u>[14] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.</u>	Letter
<u>[15] Tellus, 2023. Sandy Ridge Facility Compliance Report No.4 2022/2023.</u>	Report
<u>[16] Tellus, Email. Tellus to DWER, 2022, Storage of waste consignments at the Sandy Ridge Facility - 12-month storage timeframe information request, 21 February 2022.</u>	Email
<u>[17] Tellus, 2023. Sandy Ridge – Biannual Groundwater Monitoring Event 6. Summary Letter Report, September 2023.</u>	Report
<u>[18] Tellus, 2023 Sandy Ridge Soil Audit – 2023.</u>	Report
<u>[19] EPA Report 1767 Sandy Ridge Facility – Alignment of Gate Waste Acceptance Tonnage. 4 June 2024.</u>	Report
<u>[20] Tellus, 2021, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-001. 1 September 2022.</u>	Plan
<u>[21] Tellus, 2016 Waste Acceptance Procedure TCO-6-SR-01400-GE-PRO-0001 August 2016</u>	Procedure

### 5.2 External references

- A Commonwealth of Australia. 2014. Annual Compliance Report Guidelines.
- B Commonwealth of Australia 2020 PFAS National Environmental Management Plan Version 2.0 – January 2020.

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## APPENDIX A - EPBC 2015/7478 AUDIT TABLE

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- This Audit Table is a summary of the requirements applying to this Proposal. Refer to the Approval issued for the proposal under Part 9 of the EPBC Act for details/precise wording of audit elements.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence <sup>1</sup>	Comments
<b>Part A – Conditions Specific to the Action</b>				
A.1	To manage the impacts of the action on the <b>environment</b> , the <b>approval holder</b> must comply with conditions 1 and 9 attached to the <b>WA approval</b> to the extent those conditions apply to the taking of the action specified in this approval.	Non-compliant	<p>[01] Tellus, 2024. Compliance Assessment Report No. 6 2023-2024 Ministerial Statement 1078</p> <p>[17] Tellus, 2023. Sandy Ridge – Biannual Groundwater Monitoring Event 6. Summary Letter Report.</p> <p>[03] Tellus, Leachate Monitoring and Management Plan, Version E<sup>2</sup>, 7 May 2020</p> <p>[02] Tellus, 2024. Sandy Ridge – Biannual Groundwater Monitoring Event 7. Summary Letter Report.</p> <p>[18] Tellus, Sandy Ridge Soil Audit – 2023</p> <p>[19] EPA Report 1767</p>	<p>Detailed findings regarding compliance with Conditions 1 and 9 of MS 1078 for the 2023-2024 reporting period are provided in the 2023-2024 CAR [01].</p> <p><b>Condition 1 of MS 1078 – Non-compliant</b></p> <p>The extent of the proposal, as defined in Table 2 of Schedule 1 was exceeded for various liquid and radiological wastes regarding the maximum temporary storage limit of 12 months during the reporting period. It is noted that Tellus has pre-emptively notified DCCEEW of all waste packages (chemical and radiological) expected to exceed the 12-month temporary storage limit during the 2024-2025 reporting period.</p> <p><b>Condition 9 of MS 1078 – Compliant</b></p> <p>Requirements associated with Condition 9 – Terrestrial Environmental Quality are considered to have been met based on demonstrated compliance with the objectives defined in the Leachate Monitoring and Management Plan (LMMP) [03], approved by DWER in May 2020.</p> <ul style="list-style-type: none"> <li>• The environmental objective, to ensure that impacts to soil quality are minimised was considered to have been met based on no detected impacts detected during monitoring [02] &amp; [17].</li> <li>• Biannual sampling (Groundwater Monitoring Events (GME)) against the parameters defined in Appendix H1 and H2 of the LMMP were undertaken in October 2023 (GME 6) and April 2024 (GME 7). Results from GME 6 [17] and 7 [02], indicate that requirements outlined in the LMMP and the DGMMMP had been implemented and identified no detected impacts from waste disposal activities. The reports specified that results were likely reflective of background conditions and highly unlikely caused by site operations.</li> <li>• A soil survey was conducted in 2023 (Sandy Ridge Soil Audit – 2023 [18]), which concluded that the level of soil contamination at Sandy Ridge is low, with the concentration of most analytes being similar to the 2020 baseline. All concentrations detected were lower than NEMP guidelines for residential properties with gardens (HIL B).</li> <li>• Following Tellus’s application for the <i>Alignment of Gate Waste Acceptance Tonnage</i>, the draft Ministerial Statement conditions in EPA Report 1767 (4 June 2024) [19] species that Tellus must update the LMMP.</li> </ul>
A.2.1	To enable the early detection of any leachate and to protect the <b>environment</b> from impacts from leachate to deep groundwater, the <b>approval holder</b> must submit a deep groundwater monitoring and management plan. The deep groundwater monitoring and management plan must commit the <b>approval holder</b> to undertake monitoring and management of potential impacts to the groundwater within the weathered granite and granite hard rock (bedrock) as specified below. The <b>approval holder</b> must not <b>commence waste receipt</b> unless the <b>Minister</b> has approved the deep groundwater monitoring and management plan in writing. If the <b>Minister</b> approves the deep groundwater monitoring and management plan then the approved deep groundwater monitoring and management plan must be implemented.	Compliant	<p>[02], [17]</p> <p>[04] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, V0, 15 May 2020.</p> <p>[05] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020.</p>	<p>Tellus originally submitted a Deep Groundwater Monitoring and Management Plan (DGMMMP), dated 15 May 2020 [04] to the Minister on 15 May 2020. DAWE issued a letter to Tellus dated 29 May 2020 [05] that approved the DGMMMP [dated 15 May 2020 (Rev0)] in accordance with Condition 2(1) of Part A of EPBC 2015/7478. A review of the DGMMMP was undertaken in 2022 and sent to EPBC Monitoring at DAWE (now DCCEEW) on 22 November 2022 and an email response was received from DCCEEW (22/02/2023) acknowledging they had received a copy of the revised DGMMMP. To align with the new Leachate Management and Monitoring Plan required under draft Ministerial Conditions in EPA Report 1767 (04 June 2024) Tellus have commissioned an external review of the DGMMMP and will consult with DCCEEW during this process.</p> <p><b>Implementation</b></p> <p>The following monitoring requirements for the deep groundwater bore (SRMB167) were included in the DGMMMP (Table 2-1).</p> <ul style="list-style-type: none"> <li>• Twelve sampling events were undertaken to determine a baseline to establish trigger and threshold criteria. At the time of preparing this report the LMMP was being updated to reflect the updated trigger and threshold levels.</li> <li>• Biannual sampling against the parameters defined in Appendix H1 and H2 of the LMMP had been undertaken (GME 6 [17] (October 2023) and GME 7 [02] (April 2024)).</li> </ul> <p><b>Ongoing monitoring</b></p> <p>Summary reports for GME 6 and 7 identified the following:</p> <p>Standing water levels (SWL) measured at all groundwater bores were within the assessment criteria trigger 0.5 m range.</p> <ul style="list-style-type: none"> <li>• Seven (7) analytes were slightly above the interim assessment for GME 6 and twelve (12) analytes were slightly above the interim assessment criteria for GME 7; however, no threshold assessment criteria were exceeded.</li> </ul> <p>The reports concluded that the analytes that measured above the interim assessment criteria in GME 6 and GME 7 suggest that:</p> <ul style="list-style-type: none"> <li>• Results are likely reflective of background conditions and highly unlikely caused by site operations.</li> <li>• Human influence during bore installation and/or sampling may have contributed to the increased variability metals concentrations.</li> </ul>

<sup>1</sup> Refer to Section 5.1 Supporting, verifying information, documentation.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence <sup>1</sup>	Comments
A.2.2	The deep groundwater monitoring and management plan must specify:	-	-	-
A.2.2 a	a) monitoring procedures and protocols, including monitoring location points and frequency of monitoring (minimum every six (6) months);	Compliant	[04]	Section 5 (Monitoring) of the DGMMP [04] provided an overview of the deep groundwater bore monitoring program, including monitoring points and frequencies.
A.2.2 b	b) mitigation and management measures;	Compliant	[04]	Table 2-1 [04] of the DGMMP detailed mitigation actions. Section 4.8.3 (Facility Manager) of the DGMMP identified that the Facility Manager is responsible for ensuring environmental mitigation/management requirements are implemented.
A.2.2 c	c) an adaptive management framework, including early warning triggers, trigger criteria, monitoring design and methodologies, and trigger management actions;	Compliant	[04]	Section 2.3.3 of the DGMMP [04] noted that Tellus will complete adaptive sampling and analysis based on a prioritisation of analytical suites in the event sufficient groundwater cannot be extracted for chemical and radionuclide analysis. Table 2-4 [04] presented groundwater monitoring scenarios and adaptive sampling and analysis. An adaptive management framework was included as Section 3 of the DGMMP that referred to a two-tiered adaptive leachate management and monitoring framework. Figure 3-1 [04] provided an overview of the adaptive groundwater monitoring and trigger actions.
A.2.2 d	d) <b>incident</b> reporting;	Compliant	[04]	Incident reporting was addressed in Section 3.2 [04] of the DGMMP which noted that any incidents would be managed in accordance with the requirements of its certified management system. The Sandy Ridge Facility has implemented the MYOSH system for recording and managing all incidents. The Sandy Ridge facility was added to the scope of Tellus' AS/NZS ISO 45001:2018 and AS/NZS ISO 14001:2016 certification in early 2022. Clause 10.2 requires the establishment, implementation and to maintain a process(s), including reporting, investigating and taking action to determine and manage incidents and non-conformities.
A.2.2 e	e) review periods; and	Compliant	[04]	Review periods were specified in Section 4.3 [04] of the DGMMP. At the time of reporting the DGMMP had been reviewed and updated following the generation of site specific radiological and chemical groundwater screening levels and was awaiting approval from DCCEEW. The DGMMP stated that "At a minimum, this DGMMP will be revised to address deep groundwater monitoring and management aspects no less than every three years" (p.53).
A.2.2 f	f) implementation reporting and auditing by a <b>suitably qualified person</b> .	Compliant	[04], [02], [17]	Reporting and auditing of the DGMMP by a suitably qualified person is addressed in Section 7.4 of the DGMMP [04]. It is proposed that the audits are undertaken every three years. An independent audit was completed in November 2023.
A.2.3	To be capable of detecting any potential contamination of groundwater, the deep groundwater monitoring and management plan must include parameters collected during at least 12 months of baseline monitoring of groundwater and soil quality undertaken prior to <b>commencing waste receipt</b> .	Compliant	[02] / [04], [18] [06] EMM, 2021. Groundwater Quality Trigger and Threshold Criteria – Sandy Ridge Facility. Report # P200582 RP1 March 2021 [07] Landloch, 2020. Sandy Ridge Project: Baseline soil audit for the facility, Mt. Walton access road and Sandy Ridge Access Rd. October 2020	Twelve deep groundwater baseline sampling events were undertaken to establish trigger and threshold criteria. The Groundwater Quality Trigger and Threshold Criteria report (EMM, 2021 [06], based on this sampling was issued in March 2021, prior to in-ground disposal commencing. Groundwater monitoring has indicated no detectable environmental impacts resulting from operations. A baseline soil audit was undertaken by Landloch [07] in two campaigns (April 2019 and January 2020). The audit summary stated "Surface soils of the Sandy Ridge Project have been audited for a range of testing suites, including Inorganics, Heavy Metals, Asbestos, PCBs, PFAS, and Radionuclides. The audit results indicate that no significant environmental concerns currently exist for the soils that have been sampled." Tellus is required to conduct a targeted soil quality audit every three years in accordance with Sandy Ridge's Leachate Monitoring and Management Plan (LMMP). A soil survey was conducted in January 2023 (Sandy Ridge Soil Audit – 2023) [18], which concluded that the level of soil contamination at Sandy Ridge is low, with the concentration of most analytes being similar to the 2020 baseline. All concentrations detected were lower than NEMP guidelines for residential properties with gardens (HIL B).

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Condition No.	Condition	Compliance Status	Evidence <sup>1</sup>	Comments
A.3	To exclude potential floodwaters from the site and to prevent the release of potentially contaminated floodwaters to the environment, the <b>approval holder</b> must ensure that any surface water that enters or leaves the action area cannot spread contaminants out of the action area. To meet this objective the <b>approval holder</b> must ensure that monitoring of the action's impacts is capable of detecting any contaminants before they can be transported out of the action area.	Compliant	<p>[08] DWER Environmental Licence L9240/2020/1 (<a href="http://www.dwer.gov.au">www.dwer.gov.au</a>).</p> <p>[09] DWER Works Approval W6243/2019/1 (<a href="http://www.dwer.gov.au">www.dwer.gov.au</a>).</p> <p>[10] DWER Works Approval W6308/2019/1 (<a href="http://www.dwer.gov.au">www.dwer.gov.au</a>).</p> <p>[03]</p> <p>[10] DWER, Letter, 2020, Sandy Ridge Facility Ministerial Statement 1078 Leachate Monitoring and Management Plan Approved, 14 May 2020, Ref: DWERT280973; DWERT463.</p> <p>[11] Tellus 2021. Surface Water Control Operational Procedure SR-08.511, February 2021</p> <p>[20] Tellus, 2021, Deep Groundwater Monitoring and Management Plan, V1, SR-11-MPL-001. 1 September 2022.</p>	<p><b>Physical Infrastructure</b></p> <p>Tellus has constructed the Facility to meet the requirements of Table 1 (p.10) of Licence L9240/2020/1 [08] issued by DWER on 29 June 2020 that requires the following concerning surface water management:</p> <ul style="list-style-type: none"> <li>• <b>Temporary Waste Storage Area</b> - "Sloped to allow surface water within the Temporary Waste Storage Area to drain to the Stormwater Retention Pond".</li> <li>• <b>Temporary Waste Storage Area Stormwater Drains</b> - "(a) Stormwater diversion drain located on the eastern side of the temporary waste storage area capable of diverting surface storm water away from the Temporary Waste Storage Area; and (b) Stormwater drain located within the temporary waste storage area capable of diverting surface storm water within the Temporary Waste Storage Area to the Stormwater Retention Pond".</li> <li>• <b>Temporary Waste Storage Area Earth Bund</b> - "To contain any liquid or solid waste that may discharge from waste containers within the Temporary Waste Storage Area."</li> <li>• <b>Stormwater Retention Pond</b> - "Total capacity of 3,926 m<sup>3</sup>, capable of capturing a 1 in 100 year 72-hour storm event from the Temporary Waste Storage Area".</li> </ul> <p>To mitigate potential floodwaters entering the Facility a flood levee measuring approximately 1 km by 11 m in width has been constructed to the east of the infrastructure area.</p> <p>Figure 2 (p.6) of Works Approval W6243/2019/1 [09] issued on 20 April 2019 by DWER specifies the civil earthworks design for drainage of the infrastructure area.</p> <p>Column 2, Table 2 (pp.9-17) of Works Approval W6308/2019/1 [10] issued on 7 February 2020 and amended 27 March 2020 by DWER includes the design and construction requirements for the specific areas of the facility including, but not limited to the waste storage – east yard, PFAS contaminated waste storage area and the low-level radiation waste liquid waste and sludge storage yard. External areas are designed to drain towards blind sumps or two stormwater retention ponds. Covered waste storage areas are designed to drain to internal blind concrete sumps which will be pumped out into 1,000 L Intermediate Bulk Containers (IBCs) if full.</p> <p>The issuing of the DWER Environmental Licence L9240/2020/1 indicates that DWER were satisfied that the Works Approvals were compliant. An audit of the Environmental Licence was conducted in July 2024 that confirmed inspections were undertaken and recorded in the MYOSH database. The audit also confirmed drainage and water storage infrastructure was in good condition and well maintained.</p> <p><b>Monitoring</b></p> <p>Groundwater monitoring was undertaken in accordance with the Leachate Monitoring and Management Plan (LMMP) [03], which was approved by DWER on 14 May 2020 [10].</p> <p>Monitoring of stormwater ponds and sumps is undertaken to ensure their integrity is maintained (scheduled inspections in MYOSH system). A summary of surface water catchments and storages, including maintenance requirements is defined in the Surface Water Control procedure (SR-08.511) [11]. The Operations EMP [20] specifies that water from these ponds and sumps can only be reused in the WIP or within the Cell, hence no discharge to the environment. The exception to this is that if water is verified by a NATA accredited lab as being contaminant-free, then it could be re-used onsite.</p>

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A.4	To ensure a nationally consistent approach to the environmental regulation of PFAS, the <b>approval holder</b> must implement the <b>PFAS National Environmental Management Plan</b> .	Compliant	[B] Commonwealth of Australia 2020 PFAS National Environmental Management Plan Version 2.0 – January 2020	<p>During the reporting period PFAS contaminated wastes were received from several sources.</p> <p>A detailed audit against the PFAS NEMP was not undertaken, however, a review against its key applicable requirements concluded that Tellus had broadly established and implemented a waste management system at Sandy Ridge that complied with the objectives of NEMP.</p> <p>Key findings include; the Sandy Ridge Waste Management System evaluates the acceptability of waste coming to site following an approved Waste Acceptance procedure [21] (WAP), which requires the waste to be characterised and assessed against numerous different criteria. This process is in alignment with the PFAS NEMP. The WAP checklist (within the PFAS NEMP [B] also asks the question as to whether future recovery and recycling of the waste is intended. It is also acknowledged in the PFAS NEMP that the range of treatment facilities and technology options commercially available to remove and/or destroy PFAS compounds is limited, and that on-site encapsulation is a preferred option.</p> <p>It was noted that the PFAS NEMP [B] (section 11.1) specifies ‘PFAS-contaminated materials, including waste PFAS-containing products, are considered to be Dangerous Goods Class 9.’; however, Section 11.2 specifies ‘PFAS-contaminated materials must be transported in accordance with the requirements of the environmental regulator’. In sighted waste management records, Including Incoming Waste Vehicle Checklists all PFAS containing wastes have been classified as non-DG. Interviewed Tellus personnel stated that they believed they were compliant because in WA the NEMP contradicts WA legislation, which references the ADG Code. The ADG Code (section 3.3.3 Australian Special Provisions, # AU01) specifies ‘Environmentally Hazardous Substances meeting descriptions of UN3077 or UN3082 are not subject to this Code when transported by road or rail in:</p> <ul style="list-style-type: none"> <li>a) Packaging’s that do not incorporate a receptacle exceeding 500kg (L); or</li> <li>b) IBCs.</li> </ul>
A.5	The <b>approval holder</b> must ensure waste emplacement is undertaken as described in the action description of this approval notice. The <b>approval holder</b> must not emplace waste by borehole disposal (commonly referred to as the BOSS method).	Compliant	-	All permanently disposed of waste was placed within the engineered waste cell. Emplacement of waste by borehole disposal (commonly referred to as the BOSS method) is not currently planned for operational activities.
<b>Part B – Standard Administrative Conditions</b>				
B.6	<b>Notification of the date of commencement of the action</b> The <b>approval holder</b> must notify the <b>Department</b> in writing of the date of <b>commencement of the action</b> within 10 <b>business days</b> after the date of <b>commencement of the action</b> .	Compliant	<p>[12] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm.</p> <p>[13] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm.</p> <p>[14] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.</p>	<p>On 18 July 2019 [12] Tellus notified by email the Department’s Post Approvals Section that commencement of the action occurred on 7 July 2019. The Department acknowledged the notification in a return email, also dated 18 July 2019 [13].</p> <p>The Department formally responded to the notification of commencement of the action in a letter dated 20 August 2019 [14].</p>
B.7	<b>Compliance records</b> The <b>approval holder</b> must maintain accurate and complete <b>compliance records</b> .	Compliant	Online Health, Safety & Environmental software ( <a href="http://www.inxsoftware.com">www.inxsoftware.com</a> ).	<p>Tellus has implemented an online health, safety and environment online management software program, MyOSH, to facilitate the management of environmental obligations. The system allows for compliance records and tasks to be assigned to specific obligation conditions as well as environmental monitoring data to be managed, including, but not limited to real-time data and chains of custody.</p> <p>Waste management records are maintained using the Tellus’s online waste management system.</p>
B.8	If the <b>Department</b> makes a request in writing, the <b>approval holder</b> must provide electronic copies of <b>compliance records</b> to the <b>Department</b> within the timeframe specified in the request.	Not Applicable	-	There have been no requests from the Department concerning electronic copies of compliance records, therefore this requirement was not triggered within the reporting period.



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Condition No.	Condition	Compliance Status	Evidence <sup>1</sup>	Comments
B.9	<p><b>Annual compliance reporting</b></p> <p>The <b>approval holder</b> must prepare a <b>compliance report</b> for each 12-month period following the date of <b>commencement of the action</b>, or as otherwise agreed to in writing by the <b>Minister</b>. The <b>approval holder</b> must:</p>	Compliant	-	This is the Fifth Annual Compliance Report (ACR) to be written for EPBC 2015/7478. Reports have been prepared for each annual period since the project commenced.
B.9.a	a) publish each <b>compliance report</b> on the <b>website</b> within 60 <b>business days</b> following the relevant 12-month period;	Compliant	[15] Tellus, 2023. Sandy Ridge Facility Compliance Report No.4 2022/2023. <a href="#">Sandy Ridge Facility Regulatory Information</a> page, Tellus website (www.tellusholdings.com).	The 2022-23 ACR [15] as well as the previous three ACRs are available on the <a href="#">Sandy Ridge Facility Regulatory Information</a> page of the Tellus website. The ACR for the reporting period 2023 – 2024 will be published to the <a href="#">Sandy Ridge Facility Regulatory Information</a> page of the Tellus website within 60 business days following the relevant 12-month period. The reporting period ended on 6 July 2024; therefore, this ACR will be published by 28 September 2024.
B.9.b	b) notify the <b>Department</b> by email that a <b>compliance report</b> has been published on the <b>website</b> within <b>five business days</b> of the date of publication;	Compliant	[15] <a href="#">Sandy Ridge Facility Regulatory Information</a> page, Tellus website (www.tellusholdings.com).	All previous ACRs written for EPBC 2015/7478 were published to the <a href="#">Sandy Ridge Facility Regulatory Information</a> page of the Tellus website. Email notification to the department was sighted. The Department will be notified by email when this ACR has been published on the website (within five business days of the date of publication). Evidence of the notification will be included in the Compliance Report for the reporting period 2023 – 2024.
B.9.c	c) keep all <b>compliance reports</b> publicly available on the <b>website</b> until this approval expires;	Compliant	[15] <a href="#">Sandy Ridge Facility Regulatory Information</a> page, Tellus website (www.tellusholdings.com).	All previous ACRs have been published to the <a href="#">Sandy Ridge Facility Regulatory Information</a> page of the Tellus website. ACRs will be publicly available on the Sandy Ridge Facility section of the Tellus website until EPBC 2015/7478 expires.
B.9.d	d) exclude or redact <b>sensitive ecological data</b> from compliance reports published on the <b>website</b> ; and	Not Applicable	[15]	The published Sandy Ridge Facility ACRs do not include any sensitive data ecological data that requires redacting.
B.9.e	e) where any <b>sensitive ecological data</b> has been excluded from the version published, submit the full <b>compliance report</b> to the <b>Department</b> within 5 <b>business days</b> of publication.	Not Applicable	[15]	The published Sandy Ridge Facility ACRs did not include any sensitive data ecological data that requires redacting.
B.10	<p><b>Reporting non-compliance</b></p> <p>The <b>approval holder</b> must notify the <b>Department</b> in writing of any: <b>incident</b>; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two <b>business days</b> after becoming aware of the incident or non-compliance. The notification must specify:</p> <p>a) the condition which is or may be in breach; and b) a short description of the incident and/or non-compliance.</p>	Non-compliant		<p>As of 6 July 2024 the extent of the proposal, as defined in Table 2 of Schedule 1 of MS 1078, has been exceeded regarding the maximum temporary storage time of 12 months for the various liquid and radiological wastes. These have been reported through the Annual MS 1078 Compliance Assessment Report.</p> <p>As this is an ongoing non-compliance that Tellus is currently addressing. The delay in obtaining regulatory approvals required for the disposal of radioactive wastes has now been resolved and permits for the permanent disposal of these wastes are now being issued, which is allowing the backlog to be addressed.</p> <p>Certain chemical wastes require treatment before they can be disposed of permanently to the waste cell and the time required to develop and confirm the effectiveness of treatment methods has extended beyond 12 months.</p> <p>Tellus have consulted extensively with DWER regarding this issue and have an agreed plan to address the backlog. In addition, Tellus have pre-emptively provided DCCEEW with a list of wastes that are likely to exceed the 12-month storage requirement during the next reporting period.</p> <p>The Licence was amended in June 2023 to authorise the treatment of liquid waste outside of the Waste Immobilisation Plant in portable liquid waste treatment equipment and an acid waste treatment plant has been approved for construction to enable the safe disposal of most of the liquid waste that has exceeded the 12-month temporary storage timeframe.</p>
B.11	<p>The <b>approval holder</b> must provide to the <b>Department</b> the details of any <b>incident</b> or non-compliance with the conditions or commitments made in <b>plans</b> as soon as practicable and no later than 10 <b>business days</b> after becoming aware of the incident or non-compliance, specifying:</p> <p>a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b) the potential impacts of the incident or non-compliance; and c) the method and timing of any remedial action that will be undertaken by the approval holder.</p>	Non-compliant	[16] Tellus, email dated 21 February 2022 from Tellus Holdings Ltd to	As detailed above Tellus did not provide details, corrective actions, potential impacts or remedial actions for each individual waste batch within 2 business days of the batch reaching the 12-month limit during the reporting period. This is because there are no impacts associated with the non-compliance and Tellus has an agreed plan with DWER to address the backlog. In addition, Tellus have pre-emptively provided DCCEEW with a list of wastes that are likely to exceed the 12-month storage requirement during the next reporting period.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence <sup>1</sup>	Comments
B.12	<b>Independent audit</b> The <b>approval holder</b> must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the <b>Minister</b> .	Not Applicable	-	There has been no request from the Minister concerning an independent audit, therefore this requirement was not triggered within the reporting period. An independent annual waste audit and licence compliance audit are undertaken that inform this ACR.
B.13	For each <b>independent audit</b> , the <b>approval holder</b> must: <ul style="list-style-type: none"> <li>a) provide the name and qualifications of the independent auditor and the draft audit criteria to the <b>Department</b>;</li> <li>b) only commence the <b>independent audit</b> once the audit criteria have been approved in writing by the <b>Department</b>; and</li> <li>c) submit an audit report to the <b>Department</b> within the timeframe specified in the approved audit criteria.</li> </ul>	Not Applicable	-	Not Applicable (not triggered).
B.14	The <b>approval holder</b> must publish the audit report on the <b>website</b> within 10 <b>business days</b> of receiving the <b>Department's</b> approval of the audit report and keep the audit report published on the <b>website</b> until the end date of this approval.	Not Applicable	-	Not Applicable (not triggered).
B.15	<b>Completion of the action</b> Within 30 days after the <b>completion of the action</b> , the <b>approval holder</b> must notify the <b>Department</b> in writing and provide <b>completion data</b> .	Not Applicable	-	Not Applicable (not triggered).