



13 February 2024

Our Reference: 730-949-LET-YPN-064

Attention: Ben Sharman
A/Statutory Planning Coordinator
City of Karratha
Lot 1083 Welcome Road
Karratha Western Australia 6714

To Ben,

RE: SUBMISSION OF PLANNING AMENDMENT TO P2958 FOR REMEDIAL INFRASTRUCTURE

Please find attached information to be included as part of Yara Pilbara Nitrates Pty Ltd (YPN) planning amendment to Development Approval P2958 for addition of remedial infrastructure on Lot 3017, Village Road, Burrup.

Update of site plan

As discussed, at the time of the original P2958 issue, the site plans were preliminary and final configuration was adjusted to meet constructability requirements. This included finalisation of pond sizing and locations, move of Unit 88 close to Units 91/93, adjustments of tank orientations and locations of some stores, substations, and offices at site. We note that there was no change to the use of the site and the infrastructure elevation plans approved in 2013 remain accurate. The existing site plan and elevations are attached for your records.

Background to amendment

The site is a 'Prescribed Premise' and operates subject to the conditions of DWER Licence No. L9223/2019/1. Construction of the TAN Plant commenced in February 2013 and commissioning was completed in September 2017. The plant then operated intermittently for a total of approximately 100 days up to May 2019 prior to shut-down to address significant construction deficiencies. During the early operations loss of containment of ammonium nitrate solution occurred that has resulted in groundwater contamination. On 1 February 2019, Mr Ron D'Ercole of JBS&G Australia Pty Ltd (JBS&G) was engaged to provide Contaminated Sites Auditor services and prepare Mandatory Auditor's Reports (MARs) for the site. A substantial program of repairs and remedial works was completed through 2019 to 2021, and the site is currently operational.

The site was first classified by DWER on 7 December 2018 under the Contaminated Sites Act 2003 as 'Possibly contaminated – investigation required'. Following investigation, assessment, and detailed engineering design, YPN made the decision to remediate in late 2021. On 10 August 2022, DWER approved Works Approval W6639 for construction of the remedial infrastructure. Then on 6 February 2023, the site classification was updated to 'Contaminated – remediation required'.

A number of specialist environmental and engineering consultants were engaged to prepare the operational philosophy and detailed design for the remedial infrastructure. The designs were subject to

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rigorous risk assessment and in the case of the evaporation ponds these also passed third party Subject Matter Expert review. All designs were reviewed and approved by the Auditor and DWER. Works Approval W6639 was subsequently granted by DWER in August 2022 after public advertisement of the Works Approval application. The Works Approval provides conditions for the construction and “time limited operation” (180 days operation) of these works after which a Licence amendment will be required for ongoing operation. Stormwater coming from upstream of site is diverted around the site via drainage swales and flows downstream to the upper supratidal flats. Stormwater modelling for the drainage around the evaporation ponds has been completed and is also attached. This was a key focus of the DWER assessment to ensure flows to the supratidal flats remain comparable.

YPN has already commenced construction of the infrastructure, and therefore a retrospective amendment to Development Approval P2958 is requested for the new works. These comprise the remedial infrastructure, being the groundwater hydraulic containment system, evaporation ponds and extension of the stormwater drainage at site. We have attached a site plan identifying the scopes subject to the amendment and relevant design documentation with elevations of the remedial infrastructure.

The works are being completed under the YPN Operational Environmental Management Plan which contains controls for management of erosion and storm water, noise, and air quality, as well as management and disposal of wastes (HESQ-YPN-PLN-035-04).

Closing

In closing, we trust this provides sufficient supporting information for the City of Karratha to grant retrospective planning approval for the amendment to P2958 for the remedial infrastructure. There is no change in the existing land use for these works.

If you have any queries, please do not hesitate to contact me on 0416 394 414.

Yours Sincerely,

Anthony Black

Anthony Black
Senior Environmental Advisor
Yara Pilbara

Attachments:

1. DA application for Yara Pilbara Nitrates Pty Ltd Remedial Infrastructure signed
2. Certificate of Title
3. Premises Map
4. YPN Existing Site Plan and Elevations
5. YPN Amendment Site Plan
6. HCS Control Containers Designs (MSCC PCC1 and PCC2)
7. Evaporation Ponds Designs 211012-00094-CI-DRG-0001 to 0011
8. 18111585-198-M-Rev1_Stormwater_Modelling_Drainage Design
9. YPN Operational Environmental Management Plan
10. W6639 2022 1_Yara Pilbara Nitrates_INSTRUMENT