



**Port Augusta Operations**

Address: Level 5 of 19 Grenfell Street

Adelaide SA 5000

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20 March 2020

**SA ENVIRONMENT PROTECTION AUTHORITY LICENCE - NUMBER 50757**

**LICENCE CONDITION REF. U-251 (DEVELOP AND IMPLEMENT CLOSURE AND POST-CLOSURE PLAN) AND U-1028 (DEVELOP AND IMPLEMENT CLOSURE AUDIT PLAN)**

Port Augusta Operations Pty Ltd (Port Augusta Operations), on behalf of Cu River Port Australia Pty. Ltd., is pleased to present its proposal for compliance with the requirements of SA EPA Licence Number 50757 ("the Licence"), specifically relating to Condition U-251 (Develop and Implement a Closure and Post Closure Plan) and Condition U-1028 (Develop and Implement Closure Audit Plan).

This letter provides an outline of our compliance strategy, together with a milestone schedule of activities to ensure full compliance within the timeframes stipulated by the Licence.

**1. COMPLIANCE STRATEGY**

Compliance will be achieved through undertaking the following scope of work;

- Review of current documentation and monitoring records for the site;
- Development of draft performance and completion criteria for the assessment of the performance of both the Closure and Post-Closure Plan (CPCP) and Dust Management Plan;
- Update of the CPCP to include monitoring, maintenance and the draft performance and completion criteria;
- Undertake a site inspection to assess and validate draft performance and completion criteria to ensure these are suitable to meet closure obligations and achievable;
- Update the CPCP with adjusted and field validated criteria;
- Submission of the Updated CPCP to the SA EPA for approval;
- Undertake independent closure audit of the CPCP following SA EPA approval of the updated CPCP and prepare associated report;

- Undertake an independent evaluation of the remaining financial liability associated with continued dust management practices required and other actions required to achieve outstanding Closure Obligations beyond 30 September 2020; and
- Submission of Site Closure Audit Report, including the evaluation of remaining financial liability to EPA.

## 2. PERSONNEL

Work will be undertaken by suitably qualified and experienced environmental professionals, engaged by Port Augusta Operations.

## 3. TIMEFRAMES AND MILESTONES

The table below outlines the key milestones and timing for deliverables to be submitted to the EPA. The timing is contingent upon timely receipt of SA EPA's approval of this proposal.

Item	Milestone	Proposed Date
1	Submit draft performance and completion criteria to SA EPA	30 April 2020
2	Submit Updated Closure and Post Closure Plan to SA EPA	15 July 2020
3	Submit Site Closure Audit Report to SA EPA	30 September 2020

Should there be any unforeseen event which leads to a consideration that the above timeframes may be delayed, Port Augusta Operations will

- Notify the SA EPA without undue delay of the delay event and advise of the impact to the timing of works for the deliverables
- Request approval from the SA EPA to extend any of the delivery dates for the deliverables

## 4. CLOSE

We trust the above meets the SA EPA's requirements relating to our compliance with Licence Number 50757. Should you have any queries, please contact the undersigned.

Kind Regards

