



Licence Number L5278/1973/13

Licence Holder Pilbara Iron Pty Ltd

ACN 008 694 246

File Number: DER2013/001112

Premises

Cape Lambert Operations

Lot 64 on Plan 57724 (Crown Land Title LR3153/692)
Cape Lambert Rd Wickham 6720;

Lot 65 on Plan 241547 (Crown Land Title LR3062/529)
De Witt Location 65 Point Samson 6720;

Lot 66 on Plan 241547 (Crown Land Title LR3062/531)
De Witt Location 66 Point Samson 6720;

Lot 106 on Plan 54397 (Crown Land Title LR3062/581)
De Witt Location 106 Point Samson 6720;

Lot 280 on Plan 217843 (Crown Land Title
LR3122/588) De Witt Location 280 Antonymyre 6714;

Lot 404 on Plan 194355 (Crown Land Title
LR3114/871) De Witt Location 404 Point Samson
6720;

Lot 574 on Plan 67839 (Crown Land Title LR3164/506)
Mount Anketell 6714;

Lot 1002 on Plan 402557 (Crown Land Title
LR3164/424) Point Samson 6720;

Part Lot 63 on Plan 54397 (Crown Land Title
LR3119/871) De Witt Location 63 Point Samson 6720;
and

Part Lot 265 on Plan 220920 De Witt Part Location
265 (Crown Land Title LR3119/863)

Mount Anketell 6714

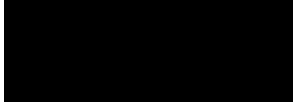
CITY OF KARRATHA

Date of Amendment

24/08/2018

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.



James Milne

Manager Resource Industries

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Definitions and interpretation

Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
Amendment Notice	refers to this document
Assigned Level	means the noise level determined under regulation 8 of the Noise Regulations
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 33 Cloisters Square PERTH WA 6850 info@dwer.wa.gov.au
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986</i> (WA)
EP Regulations	<i>Environmental Protection Regulations 1987</i> (WA)
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Licence Holder	Pilbara Iron Pty Ltd
m ³	cubic metres
Minister	the Minister responsible for the EP Act and associated regulations

MS	Ministerial Statement
mtpa	million tonnes per annum
MWe	means power output (electricity generated) in megawatts
NEPM	National Environmental Protection Measure
mg/Nm ₃	milligrams per cubic metre using a standard volume
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	has the same meaning given to that term under the EP Act.
PM ₁₀	used to describe particulate matter that is smaller than 10 microns (µm) in diameter.
ppmvd	parts per million dry volume
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report.
Primary Activities	refers to the activities on the front of the Licence and the description provided in Schedule 2 of the Licence.
Rio Tinto	refers to Rio Tinto Limited
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>
µg/m ³	micrograms per cubic metre
Works Approval	refers to Works Approval W5435/2013/1
Works Approval Holder	Robe River Mining Co. Pty. Ltd.

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment for Category 52. No changes to the aspects of the original Licence relating to Categories 5, 12, 58 or 73 have been requested by Pilbara Iron Pty Ltd (the Licence Holder).

The following guidance statements have informed the decision made on this amendment:

- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

Amendment description

This Amendment Notice is for the assessment and authorisation to operate the Cape Lambert Power Station (CLPS), to service the Primary Activities at the Cape Lambert Operations (the Premises) and allow for port expansions. The CLPS is located approximately 2.2km to the north of the town of Wickham and approximately 1.5km south-west of the Cape Lambert construction camp.

On 23 April 2018, Robe River Mining Co Pty Ltd, the Works Approval Holder and subsidiary company to Rio Tinto, notified DWER of the completion of construction and commissioning of the CLPS in accordance with Works Approval W5435/2013/1. On 28 March 2018, the Licence Holder then applied for an amendment to Licence L5278/1973/13 to operate the CLPS. In supporting documentation to the amendment application Rio Tinto, parent company of both Works Approval Holder and Licence Holder, advised that:

Pilbara Iron Pty Ltd (a member of the Rio Tinto Group) has been appointed by the participants in the Robe River Joint Venture as tenure holders of the Cape Lambert Port, to exclusively operate and maintain their respective ports on an integrated basis, on commercial terms agreed between the parties. In that regard, Pilbara Iron Pty Ltd is the entity that makes decisions and operates procedures relevant to the control of emissions and discharges regulated under Part V of the EP Act.

The CLPS consists of two LM6000PF gas turbine generators configured in an open cycle and each producing a nominal 45MWe of electrical power. The units are fitted with Dry Low Emissions burners for oxides of nitrogen (NOx) suppression.

The supporting infrastructure required to operate the CLPS includes:

- process water treatment plant;
- evaporation ponds; and
- stormwater sedimentation pond.

The CLPS will be able to operate on either natural gas or diesel. Diesel is intended as a back-up fuel for situations where natural gas is not available. The CLPS will draw diesel fuel from the fuel storage facility to be located adjacent to the Open Cycle Gas Turbines (OCGTs).

The Licence Holder has also requested an increase to the authorised volume of hydrocarbons stored at the Premises from 1,100m³ to 2,585m³ following the installation of an additional three 110m³ diesel storage tanks associated with the CLPS and a review of further ancillary

infrastructure at the Premises.

Table 2 below outlines the proposed changes to the Primary Activities conducted at the Premises.

Table 2: Primary Activities conducted at the Premises

Category	Primary Activity/Category description	Assessed design/throughput capacity
5	Processing or beneficiation of metallic or non-metallic ore	235 Mtpa
12	Screening etc of material	10 Mtpa
52	Electric power generation	90MWe
58	Bulk material loading or unloading	235 Mtpa
73	Bulk storage of chemicals	1,650m³ 2,585m ³ in aggregate

Emissions testing during commissioning

Stack emissions testing

Emissions testing of the OCGTs conducted during commissioning revealed that stack emissions met the Works Approval Holder's proposed expected operational levels referred to in the Works Approval (W5435/2013/1) for both gas and diesel. These levels were not set targets, rather a baseline for determining if the CLPS is operating as expected and designed. Two tests were conducted at each turbine at 100% load for both fuel types with each test demonstrating consistent emission concentrations. Table 3 shows the average performance of OCGT1 and OCGT2 during commissioning.

Table 3: Stack emissions during commissioning

Parameter	Natural gas target	OCGT1	OCGT2	Diesel target	OCGT1	OCGT2
NO _x (as NO ₂) at 15%O ₂ (mg/Nm ₃)	51	23	24.5	174	150	170
NO _x at 15%O ₂ (ppmvd)	25	9.9	12	85	73	82.5
CO at 15%O ₂ (ppmvd)	25	24	21.5	N/A	N/A	N/A
Particulates (g/s)	1	<0.1	<0.1	2	<0.1	<0.1
SO _x (as SO ₂) (ppmvd)	4.1	<2	<2	4.5	<2	<2
NO _x % of NSW guidelines ¹	73%	33%	35%	193%	167%	189%

Note 1: Refers to the NSW Protection of the Environment Operations (Clean Air) Regulations 2010.

Noise emissions testing

The Licence Holder conducted noise monitoring of the CLPS during commissioning, factoring in impacts from the remaining Premises operations. Monitoring was conducted 275m to the north, east, south and west of the facility, and at two intermediate locations closer to residential receptors in the town of Wickham. Noise levels measured during the commissioning of the power station are provided in Table 4 below and alongside forecast worst case noise levels previously modelled.

Table 4: Measured environmental noise levels

Turbine	Power	Measured Noise Level – dBA (Near-field)				Measured Noise Level – dBA (Intermediate and Far-field)	
		N275	S275	E275	W275	#1	#2
OCGT 2 Day 1	Gas 70%	-	47	43	46*	-	-
	Liq 100%	-	47	45*	-	-	-
	Liq 70%	-	49	46*	-	-	-
OCGT 1 Day 2	Gas 60%	-	51*	39	51	32	35
	Gas 100%	43*	42	39	-	-	-
	Gas 70%	44*	44	42	-	-	-
	Gas 50%	45*	44	44	-	-	-
OCGT 1 & 2 Day 3	Gas 80%	-	50*	-	-	31	-
	Gas 60%	-	-	-	-	32	36*
	Gas 100%	46	45	45*	41	-	-
	Gas 70%	48	47	48*	-	-	-
	Liq 70%	47*	45	48*	-	-	-
Modelled worst case noise emission		55	53	52	53	40	31

* Measurement taken downwind of the power station. Typical wind conditions speeds were 5 – 10 m/s.

Source: Resonate Acoustics, 2018

The noise data from the intermediate (Location 1 – 1,140m) and far-field (Location 2 – 2,030m) measurements was found to be controlled by the ambient noise environment not associated with power station or port activities. CLPS noise at the locations closer to receptors was found to be either inaudible or barely perceptible (Resonate Acoustics, 2018). However, wind conditions during testing were less favourable for the transport of sound compared to worst case scenarios assumed in modelling.

Other approvals

The Licence Holder has provided the following information relating to other approvals as outlined in Table 5.

Table 5: Relevant approvals

Legislation	Number	Approval
Part V of the EP Act	W5435/2013/1	Approval issued to Robe River Mining Co. Pty Ltd for the construction and commissioning of the CLPS.
<i>Dangerous goods Safety Act 2004</i>	DGS021762	Dangerous Goods Site Licence authorising 880kL diesel fuel storage.
<i>Dangerous goods Safety Act 2004</i>	DGS015722	Dangerous Goods Site Licence authorising

		1,650kL diesel fuel storage and 55kL of aviation fuel.
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Amendment history

Table 6 provides the amendment history for L5278/1973/13.

Table 6: Licence amendments

Instrument	Issued	Amendment
L5278/1973/13	07/12/2016	Full risk-based review as part of implementing the department of Environment Regulation (now DWER).
L5278/1973/13	15/05/2014	Licence reissue

Location and receptors

Table 7 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 7: Receptors and distance from activity boundary

Residential and sensitive premises	Approximate distance from CLPS
Closest residential zoned premises – Wickham	2,400m south
Zoned strategic industry City of Karratha Planning Scheme No. 8 - Wickham back beach (Port Walcott Yacht Club)	3,500m north
Town of Point Sampson	5,800m northeast

Table 8 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 8: Environmental receptors and distance from activity boundary

Environmental receptors	Approximate Distance from CLPS
Marine ecosystem	700m west Moderate to High level of ecosystem protection (DoE 2006).
Conservation area	No Parks and Wildlife Managed lands are located within a 30km radius of the operations.
Public drinking water source area (PDWSA).	The Premises is not located within a PDWSA.
Rare flora	There are no rare flora species recorded within a 30km radius of the operations.
Threatened ecological communities	There are no threatened ecological communities within a 30km radius of the operations. A priority 1 ecological community 'Stoney Chenopod association of the Roebourne Plains area' is located approximately 10km south-west of the operations.
Groundwater and groundwater salinity	The hydrogeology of the site is Rocks of Low Permeability, Fractured and Weathered Rocks – Local

	Aquifers. Depth to groundwater encountered at approximately 2 – 9m (based on information provided by Rio Tinto, 2012). The groundwater is 1000-3000TDS mg/L which is considered brackish. No bores located within 1km of Premises (based on available GIS dataset – WIN Groundwater Sites). The nearest bore is 1.6km to the east of the operations.
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Risk assessment

Table 9 below describes the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. The table below identifies whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

Table 9: Risk assessment for proposed amendments during operation

Risk Event						Consequence rating	Likelihood	Risk	Reasoning
Source/Activities		Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts				
Cat 52 Electric power generation	Operation of the CLPS	Air: associated with stack emissions from the CLPS.	Residence approximately 2,400m south of the Premises.	Air/wind	Health impacts	Slight	Rare	Low	Stack emission testing conducted during commissioning concluded that the CLPS meets the expected operational levels assessed as reasonable as part of W5345/2013/1 and specified in Table 3. Based on the relatively small capacity of the CLPS (and therefore the expected amount of air emissions), significant distance to residential receptors, criteria established under the NEPM are expected to be met for ambient air quality.
		Noise: associated with the CLPS.	Residence approximately 2,400m south of the Premises.	Air/wind	Amenity	Minor	Rare	Low	Noise testing conducted during commissioning identified that the CLPS was barely perceptible at monitoring locations near sensitive receptors (Wickham residential area). Under worst case weather conditions (low winds with temperature inversions) that place residential receptors downwind of the CLPS, Assigned Levels are likely to be met.
		Discharge to land: associated with ancillary infrastructure including evaporation ponds and water treatment systems.	Surrounding vegetation	No pathway	N/A	N/A	N/A	N/A	All ancillary infrastructure is situated within a bunded area and there are no discharges to land.

Cat 73 Bulk storage of chemicals	Additional hydrocarbon storage	Odour: associated with the venting and re-filling of tanks.	Residence approximately 2,400m south of the Premises.	Air/wind	Amenity	Slight	Rare	Low	Based on the infrequent use and separation distance of hydrocarbons, residents are only expected to experience slight odours and minimal impacts to amenity under exceptional circumstances.
		Discharges to land: associated with spills and discharges of hydrocarbon contaminated water to land or water.	Groundwater approximately 2 to 9m below ground level.	Seepage to groundwater.	Impacts to groundwater quality and loss of beneficial use	Minor	Rare	Low	No bores are located within 1km the CLPS, indicating no current use of groundwater in the area. Groundwater has been assessed as brackish with a TDS of 1,000-3,000mg/L which limits its use without desalination. Given the hydrogeology is predominantly fractured rock and low permeability rocks, it is presumed that the spreading of contaminants over large areas of groundwater is unlikely, or limited to a fracture. In the event of a spill contamination should be contained and readily remediated. Further, the storage tanks are horizontal double-skinned tanks with interstitial leak detection, and contained within a fully bunded area. Stormwater will be captured and treated by an oily water separator to contain less than 15mg/L of Total Recoverable Hydrocarbons. Therefore a spill/leak is likely to be stopped and captured prior to entering the environment. Storage of environmentally hazardous materials is regulated by the <i>Dangerous Goods Safety Act 2004</i> and associated Regulations. The management of spills and discharges from storage areas can be sufficiently regulated by <i>Environmental Protection Act 1986</i> and <i>Environmental Protection (Unauthorised Discharges)</i>

									<i>Regulations 2004.</i>
			Surrounding vegetation	Runoff into vegetated areas.	Smothering of native vegetation reducing transpiration and possibly resulting in vegetative loss.	Minor	Rare	Low	There are no threatened/priority ecological communities or rare flora within proximity to the CLPS. In addition, the areas surrounding the CLPS are degraded and hold low ecological value on a regional scale. In addition to bunding and double-skinned tanks, drainage lines and roads also act as a barrier to vegetation in the event of a spill.
			Marine ecosystem approximately 700m west.	No pathway to the marine environment.	Ecotoxicological impacts to the marine/mangrove environment.	N/A	N/A	N/A	No pathway to receptor.

Decision

The Delegated Officer has decided to authorise the ongoing operation of Category 52 electricity generation at the Premises and the increase in bulk storage of chemicals.

Conditions 2 and 3, relating to Table 4 of Schedule 3 of the existing Licence capture operational emissions relating to bulk storage of chemicals (fuel) and the management of potentially contaminated surface water. All chemicals must continue to be stored within low permeability compounds (10^{-9} metres per second or less) designed to contain not less than 110% the volume of the largest storage vessel, and at least 25% the total volume of all substances stored within that compound.

Table 4 of Schedule 3 of the existing Licence has been updated to include emission points of the CLPS. The fuel type used (gas) at the CLPS is expected to emit low concentrations of NO_x and particulates resulting in ambient air quality meeting national standards (NEPM) in close proximity to the emission points. Based on this, and the significant distance to sensitive receptors, the Delegated Officer has determined a low risk from air emissions and no further controls are required. However, the Licence Holder will be required to conduct annual stack emission monitoring to ensure that the facility continues to be maintained in good working order.

Condition 8 of the Existing Licence requires the Licence Holder to submit an annual report to DWER demonstrating compliance with all conditions of the Licence. The Licence Holder will be required to provide annual power station monitoring in order to demonstrate compliance with this condition.

DWER is currently undertaking a detailed risk review of the Licence to align it with the risk-based Regulatory Framework. The full risk-based review will incorporate these amendments into the Revised Licence.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 6 July 2018. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

Amendment

1. The Licence is amended by insertion of the following Conditions 10 and 11:
10. The Licence Holder must monitor the Emissions specified in Column 2 from the locations specified in Column 1 of Table 2A, noting the fuel type (diesel or gas) being used at the time of monitoring. Emissions must be calculated as an average over the period specified in Column 3, at the frequency specified in Column 4, and in accordance with the method specified in Column 5.

Table 2A: Air emission monitoring table

Column 1	Column 2	Column 3	Column 4	Column 5
Location	Emission ¹	Averaging period	Frequency	Method
OCGT1 and OCGT2 stacks	Volumetric flow rate (m ³ /s)	N/A	Annually	USEPA Method 2

	Nitrogen oxides (mg/m ³) ²	60 minutes		USEPA Method 7E or 7D
	Carbon monoxide (mg/m ³) ²	60 minutes		USEPA Method 10

Note 1: All units are referenced to STP dry

Note 2: Concentration units are referenced to 15% O₂.

2. Schedule 2 of the Licence is amended by the insertion of the red text shown in underline below:

The Primary Activities constitute:

Primary Activity	Premises Production or Design Capacity
Category 5 – Processing or beneficiation of metallic or non-metallic ore: Premises on which – metallic or non-metallic ore is crushed, ground, milled or otherwise processed; or tailings from metallic or non-metallic ore are reprocessed; or tailings or residue from metallic or non-metallic ore are discharged into containment cell or dam	235 Million tonnes per annum (Mtpa)
Category 12 – Screening etc. of material: Premises (other than Premises within category 5 or 8) on which material extracted from the ground is screened, washed, crushed, ground, milled, sized or separated	10 Mtpa
<u>Category 52 – Electric power generation: premises (other than premises within category 53 or an emergency or standby power generating plant) on which electrical power is generated using a fuel.</u>	<u>90MW</u>
Category 58 – Bulk material loading or unloading: Premises on which clinker, coal, or, ore concentrate or any other bulk granular material (other than salt) is loaded onto or unloaded from vessels by an open materials loading system	235 Mtpa
Category 73 – Bulk storage of chemicals etc.: Premises on which acids, alkalis or chemicals that – contain at least one carbon to carbon bond; and are liquid at STP (standard temperature and pressure), are stored.	1,650 <u>2,585</u> m ³ in aggregate

3. Table 4 of Schedule 3 is amended by the insertion of the red text shown in underline below:

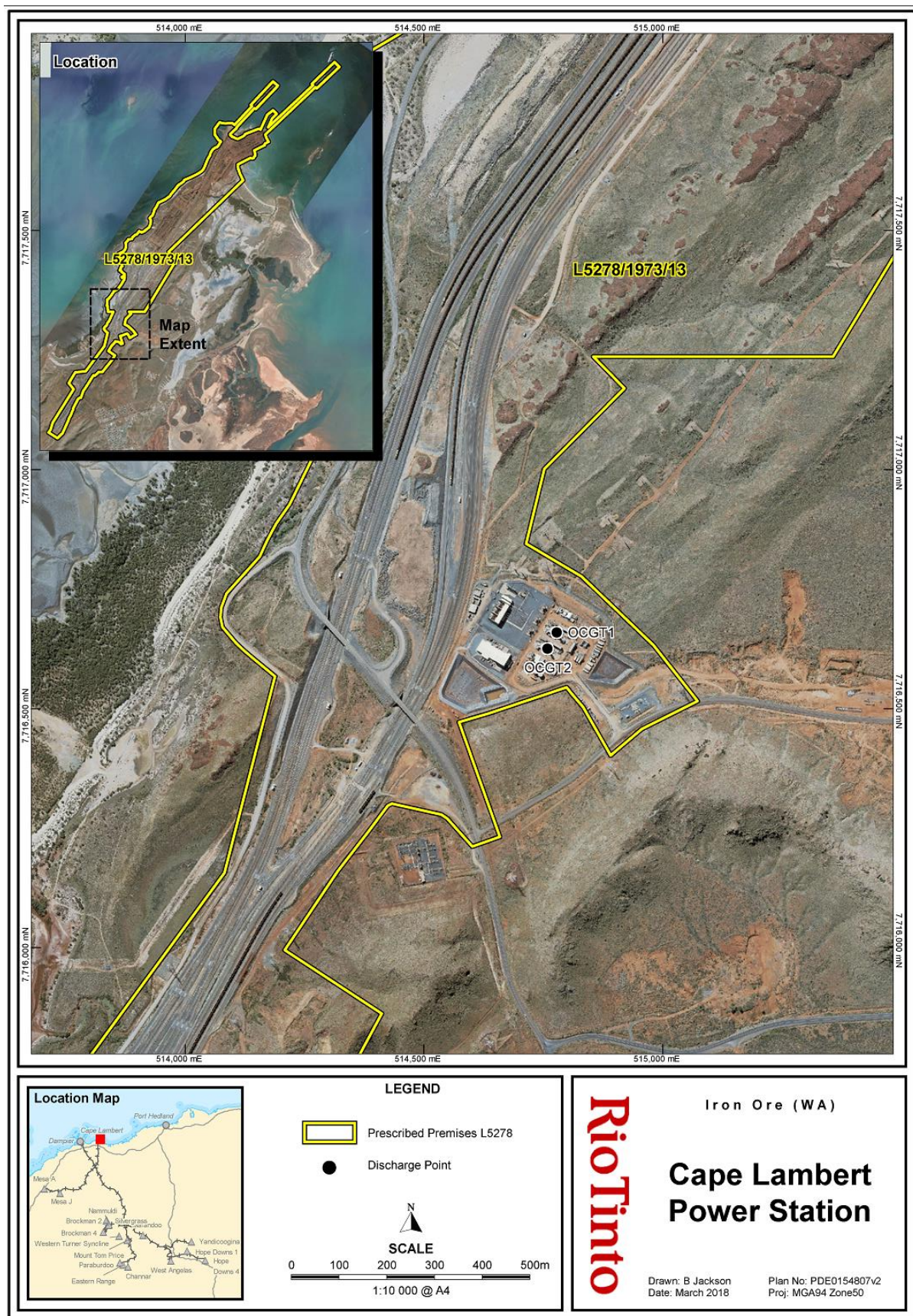
Table 4: Infrastructure and Equipment Operational Requirements Table

	Column 1	Column 2	Column 3	Column 4
	Site Infrastructure	Description	Operational requirements	Reference to maps (Schedule 1)
	Controls for stormwater, waste water and spill management			

	Column 1	Column 2	Column 3	Column 4
	Site Infrastructure	Description	Operational requirements	Reference to maps (Schedule 1)
1.	Car dumpers	Oily water separator	Treated prior to disposal. Must have the following characteristics: • a sump to allow sediment to settle prior to oil removal treatment; • a sampling point to collect a representative sample of the treated water; • screens to prevent general waste from entering the oily water treatment system; and • above ground piping, wherever practicable.	Cape Lambert A and B Infrastructure Maps
2.	Stockyard and local plant stormwater infrastructure	Stockyard drainage Local plant drainage	Must be designed to provide flood protection to infrastructure.	Cape Lambert A and B Infrastructure Map: Stockyards
3.	Stormwater discharge points (and associated sediment basins)	• CLB southern discharge point (CLD3) • Sams creek (CLD2) • CLA stockyard (CLD7) • Cooling water beach discharge (CLD4)	Stormwater discharge points must be maintained in good repair.	Cape Lambert Discharge Points Map: CLD2, CLD3, CLD4, CLD7
4.	Surface water and contaminated water infrastructure	• Infrastructure to manage surface water and contaminated water • Separate systems for contaminated water and general stormwater	Must capture water from plant areas where there is the potential for hydrocarbon contamination. Surface water and contaminated water (e.g. hydrocarbons, sediment, detergent) must be collected, contained, treated and reused wherever possible.	Cape Lambert Overview Map
5.	Liquid and Chemical Storage	Infrastructure to store chemicals including, but not limited to fuel, oil or other hydrocarbons (where the total volume of each substance stored exceeds 250 litres)	Chemicals must be located within low permeability (10^{-9} metres per second or less) compounds(s) designed to contain not less than 110% of the volume of the largest storage vessel or interconnected system, and at least 25% of the total volume of substances stored in the compound	Category 73 Infrastructure Map

	Column 1	Column 2	Column 3	Column 4
	Site Infrastructure	Description	Operational requirements	Reference to maps (Schedule 1)
6.	Premises Iron ore spill cleanup (Wharf)	Premises Wharf – cleaned by operators and street sweepers.	To prevent iron ore and sediment entering the marine environment: • clean up of the wharf must be undertaken at regular intervals using a street sweeper; and • removal of spilt iron ore under conveyors and ship loaders must be undertaken when material has built-up. To initiate and verify the above actions, an inspection of the wharf must be undertaken on a weekly basis, or additionally if required. Excess material and sediment must be stored in a contained area on the wharf and collected by a truck and transported back to the Cape Lambert stockyards.	Cape Lambert Overview Map
<u>Controls for air emissions</u>				
<u>7.</u>	<u>Cape Lambert Power Station</u>	<u>Generation of electricity using gas as a primary fuel source and diesel as a backup fuel source.</u>	<u>Exhaust air emitted from stacks at Open Circuit Gas Turbines 1 and 2.</u>	<u>OCGT1 and OCGT2</u>

4. The Licence is amended by the insertion of a Category 52 Infrastructure Map in Schedule 1 with the figure below:



5. The Licence is amended by the replacement of the Category 73 Infrastructure Map in Schedule 1 with the figure below:



Licence L5278/1973/13

Appendix 1: Key documents

	Document title	Availability
1.	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	Accessed at www.dwer.wa.gov.au
2.	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
3.	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
4.	DER, November 2016. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
5.	DER, November 2016. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	
6.	Ektimo (2018) Emission Testing OCGT1/OCGT2 Cape Lambert Power Station – Rio Tinto Iron Ore.	DWER records (A1644700)
7.	Resonate Acoustics (2018) Cape Lambert Power Station Wickham, Western Australia – Noise Monitoring & Assessment.	DWER records (A1644700)

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 6 July 2018 for review and comment. The Licence Holder responded on 27 July 2018. The following comments were received on the draft Amendment Notice.

Condition	Summary of Licence Holder comment	DWER response
Schedule 2 / Table 2 Category 73 Bulk storage of chemicals	The Category 73 assessed design / throughput capacity has not been included in Schedule 2. The assessed design / throughput capacity in Table 2 has also not taken into account the aviation fuel covered under DGS015722. To update the design / throughput capacity for Category 73 from 1,650 m³ to 2,585m³ in aggregate, in Table 2 and Schedule 2.	Updated.
Schedule 3 Table 4 Item 6: Premises Iron ore spill cleanup (Wharf)	The licensee notes this comment may be outside the scope of this amendment, however wishes to note that it is not possible to have zero discharge to the marine environment as per current wording for operational requirements, but submits that it is feasible to manage operations to prevent environmental harm. The Licensee requests alignment with EP Act s72 obligations. Reword Column 3, Item 6 from: • "To prevent iron ore and sediment entering the marine environment" to; • "To prevent iron ore and sediment causing pollution, material environmental harm or serious environmental harm to the marine environment"	Noted. The operational requirements in their existing form do not specify 'zero discharge'. DWER notes that some iron ore will be discharged to the marine environment from the wharf. To demonstrate compliance with this Condition, the Licence Holder will need to confirm that the wharf is regularly cleaned and spilt ore is removed when built up. No changes made.
Item 1. Condition 10 Table 2A: Air emission monitoring table	It is requested that the frequency of monitoring be updated from six monthly to annually given the low risk nature of emissions, and to align with the West Angelas Power Station (L7774) managed by the Licence Holder. The Yurralyi Maya Power Station (L8431) monitoring will also be requested to be amended to an annual frequency given continuing compliance with licence parameters in a future amendment.	Noted. DWER has extended monitoring frequencies from six-monthly to annually. The definition for six-monthly has also been removed. DWER will continue to monitor air emissions from the power station and may apply further controls in the event that annual monitoring indicates poor performance of the power station.

Condition	Summary of Licence Holder comment	DWER response
	The gas turbines associated with these power stations are designed to operate within specific and stable operating parameters, and hence will have a consistent emissions profile under normal operating conditions. Reducing sampling frequency improves safety with reduced contractor hours on site whilst (in our view) continuing to meet environmental objectives. To update the frequency of sampling from six monthly to annually.	