Amendment Report

Application for Licence Amendment

Part V Division 3 of the Environmental Protection Act 1986

Licence Number L4247/1991/13

Licence Holder Talison Lithium Australia Pty Ltd

ACN 139 401 308

File Number DER2021/000278

Premises Talison Lithium Mine

Maranup Ford Road, GREENBUSHES WA 6254

Legal description -

Mining Tenements M01/3, M01/6, M01/7, M01/8, M01/9, M1/16, G01/1 and G01/02 (As defined in Schedule 1)

Date of Report 27 July 2021

Decision Revised licence granted

Lauren Edmands

MANAGER, RESOURCE INDUSTRIES

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

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1. Decision summary

Licence L4247/1991/13 is held by Talison Lithium Australia Pty Ltd (licence holder) for the Talison Lithium Mine (premises), located within the Shire of Bridgetown-Greenbushes, immediately to the southern boundary of the Town of Greenbushes, approximately 250 km south of Perth, Western Australia.

This amendment report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, revised licence L4247/1991/13 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this amendment report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2.2 Amendment summary

On 11 May 2021, the licence holder submitted an application to the department to amend licence L4247/1991/13 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The following amendments relating to existing tailings storage facility 2 (TSF2) are being sought (Figure 1):

- Embankment raise to 1280 mRL
- Extension to buttress
- Ground enhancement works for foundation stability
- Additional underdrainage

Details of the proposed amendments are listed in Table 1 and shown in Figure 1 and Figure 2 below.

Table 1 Overview of proposed amendments

Item	Proposed amendments	Comment
TSF2 embankment height	Currently approved 1280 mRL, no further amendment	No change
TSF2 footprint	Increase from current 95.32 ha to 99.43 ha	No clearing proposed, emissions and discharges unaffected during operations
Upper buttress will be constructed along the full extent of the southern and western wall from the lower buttress to the crest of the 1275 mRL raise Lower buttress modified along full length of western wall, rising along		Emissions and discharges unaffected for operations

Item	Proposed amendments	Comment	
	southern wall Buttress locally widened at western wall where ground enhancement is required		
Ground enhancements	Ground stability enhancements	Emissions and discharges unaffected for operations	
Underdrainage and pipelines	 Two outlets through the north wall discharging into the ROM drainage sumps Three outlets through the west wall and two through the south, all discharging into a common collector pipe that will transfer seepage into existing seepage sump 3 Return water pipelines from exiting Sump 1, Sump 2 and Sump 3 will be rerouted to avoid ground enhancement works construction. The function and capacity of seepage collection remains unchanged. 	Underdrainage improves phreatic surface through embankment and further enhances the capture of seepage water from TSF2, minimising the movement of water towards the basement aquifer. This results in improved seepage management, and does not change the risk of emissions and discharges.	
Sumps and trenches	 Sump 1, Sump 2, Sump 3 remain in same location Sump 1 access riser to be raised above level of proposed buttress One upstream drainage trench positioned 25 m and 35 m from the raise centreline along the southern and western walls at RL 1270 m (blue line, Figure 3) One upstream drainage trench positioned 25 m from the raise centreline along the southern, western and northern wall (red line, Figure 3) 	No change to the capacity of infrastructure requirements proposed. Emissions and discharges unaffected for operations. See Figure 3	

The operational TSF2 is currently approved under licence L4247/1991/13. An amendment to the licence (July 2016), authorised the embankment raise of TSF2 to 1280 mRL, however the final height has not yet been constructed. Since the initial approval, the ANCOLD (2019) Guideline on Tailings Dams has been updated. To align with the updated guidance, in particular the stability requirements, the licence holder has updated the design documents for the TSF2 embankment raise to 1280mRL. These updated design documents were submitted as part of this amendment application. They will be incorporated into the Licence to replace the current referenced design documents (in Table 1.3.1 of condition 1.3.1) which do not meet the ANCOLD (2019) Guideline on Tailings Dams. The updated documents include changes related to stability which are not considered under Part V of the EP Act. The documents do not change the height or risks of emissions and discharges associated with the embankment raise which was approved in 2016. The condition (condition 4.2.4) in the current licence requiring the submission of a compliance report to the CEO after completing the construction of the embankment raise to 1280 mRL remains unchanged. This amendment is limited only to changes to category 5 activities from the existing licence.

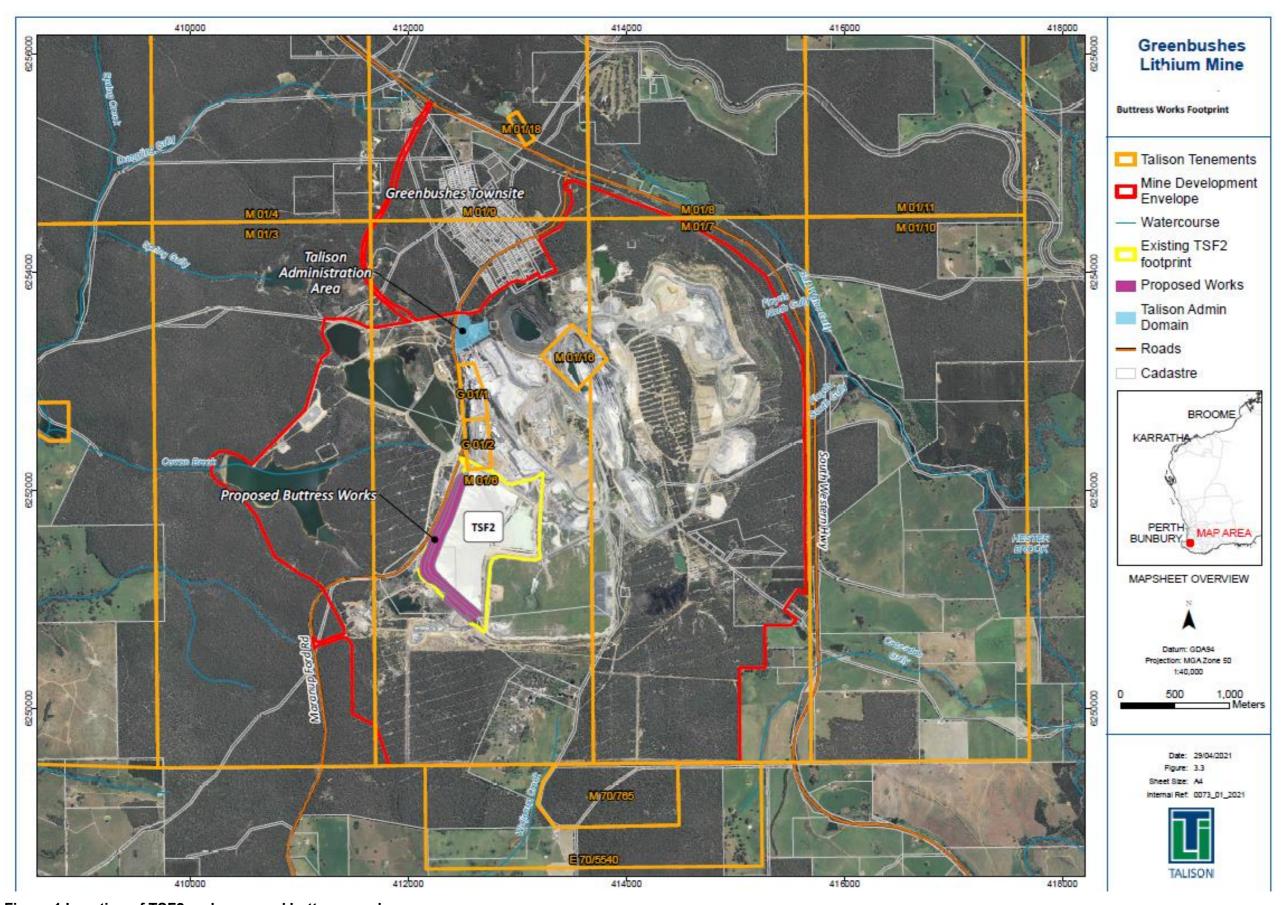


Figure 1 Location of TSF2 and proposed buttress works

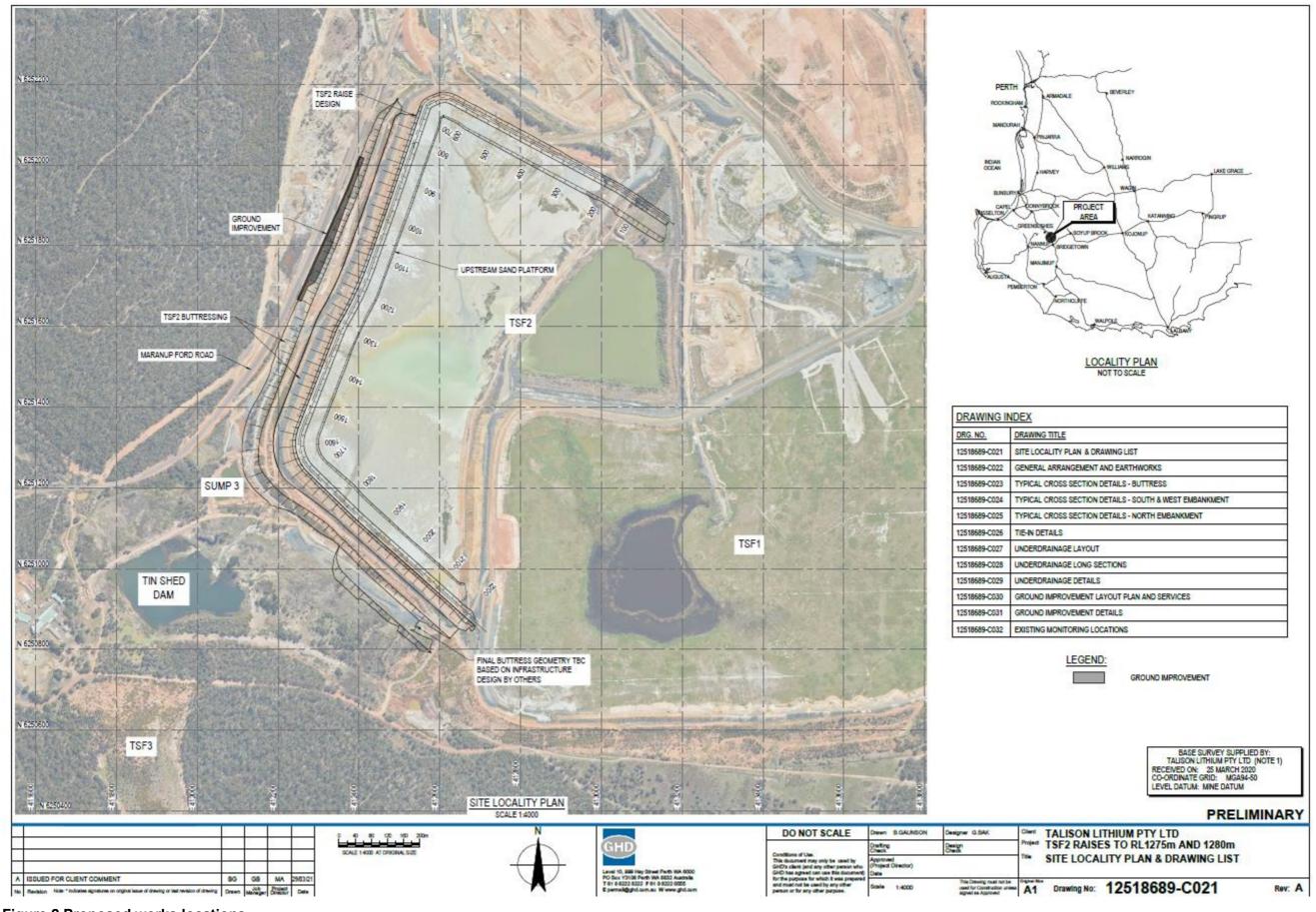


Figure 2 Proposed works locations

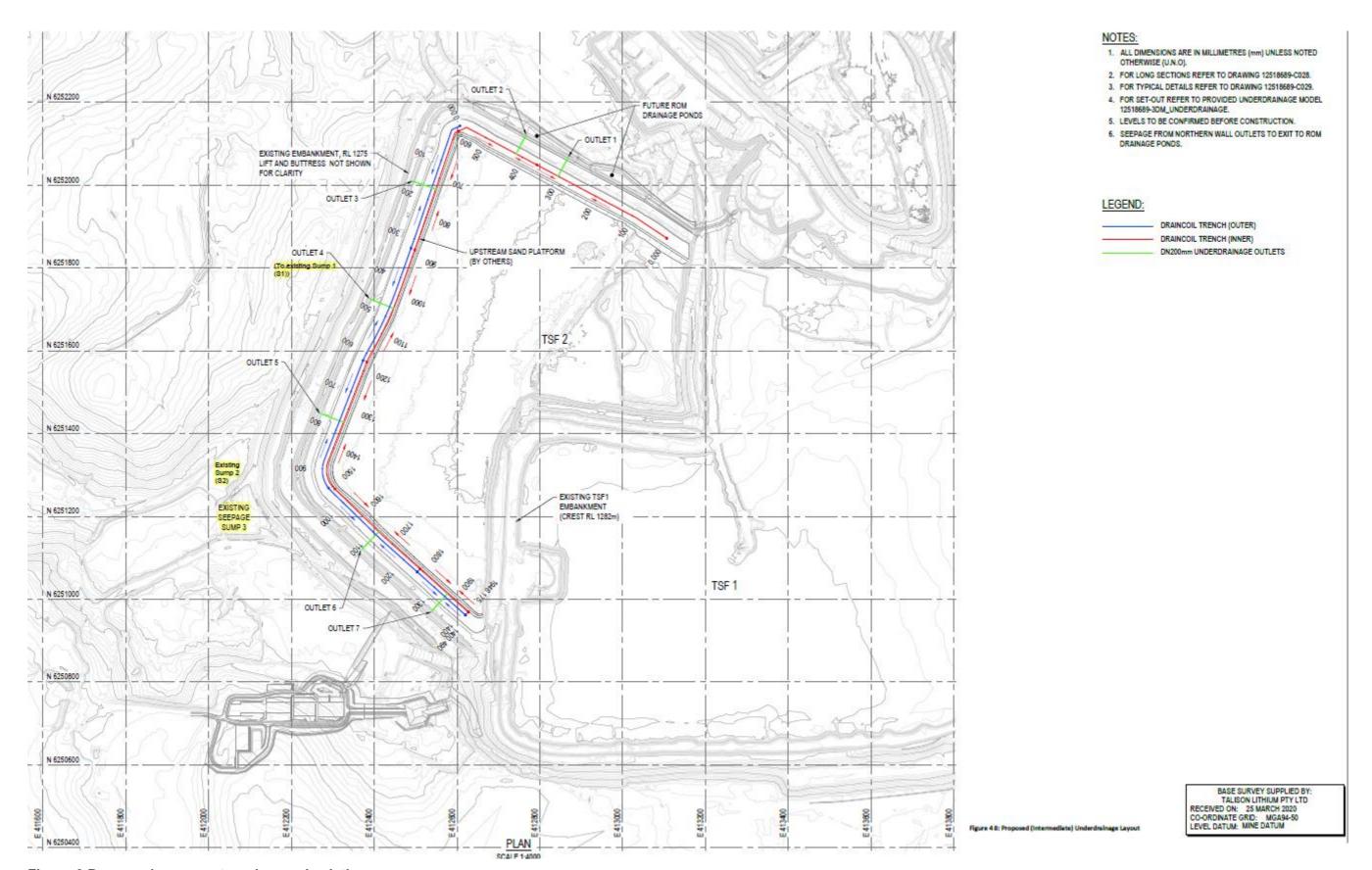


Figure 3 Proposed seepage trenches and existing sumps

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this amendment report are detailed in Table 2 below.

Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence holder controls

Emission	Sources	Potential pathways	Proposed controls	
Dust	Construction of buttress, Air/windborne pathway		The second of th	
	underdrainage and earthworks of TSF2		Additionally, the licence holder proposes to continue with the current dust monitoring program which is set out in works approval W6283/2019/1, with regular reporting and which consists of:	
			Meteorological monitoring	
			Osiris Dust monitoring (TSF, PM10) at the northern boundary and south east boundary	
			HiVol monitoring at the northern boundary	
Noise			Noise Management plan which includes continuous noise monitoring at the noise bund.	
			Noise of the operations currently regulated under a Regulation 17 exemption of the <i>Environmental Protection (Noise) Regulations 1997</i> , and will therefore not be assessed as part of this assessment.	
Seepage from additional tailings deposited into TSF2	TSF2	Seepage to soils, surface- and groundwater	The proposed embankment height of 1280 mRL has previously been assessed and approved by the department in 2016, which is reflected in the current licence. The new design aligns with new stability requirements as set out in the relevant ANCOLD (2019) guideline only, and does not alter the risk of emissions and discharges.	
			Seepage from the TSF2 resulting from the proposed embankment height is therefore not further addressed as part of this assessment.	

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the licence holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity	
Town of Greenbushes	<1 km north from premises boundary	
Multiple residents south, south east and south west of the premises boundary	Approx. 255 m – 1.7 km from premises boundary	
Environmental receptors	Distance from prescribed activity	
Greenbushes State Forest	Surrounding the premises.	
Hester State Forest	No additional emissions or discharges result from proposed works which may impact these receptors. These environmental receptors are therefore not further assessed in this amendment report.	
Threatened/Priority Flora and Fauna	No additional clearing is proposed, and TSF2 is already operational. Upgrade works unlikely change the impact already occurring.	
	These environmental receptors are therefore not further assessed in this amendment report.	
Greenbushes Catchment Area	North of the premises boundary	
	No additional emissions or discharges result from proposed works which may impact these receptors. These environmental receptors are therefore not further assessed in this amendment report.	
Blackwood River	South of the premises boundary	
	No additional emissions or discharges result from proposed works which may impact these receptors. These environmental receptors are therefore not further assessed in this amendment report.	
Identified bores in close proximity	Groundwater bores identified south (down-hydraulic gradient) of premises: 700 m, 790 m, 2.8 km south; 2.2 km, 3 km south west, 330 m east	
	No additional emissions or discharges result from proposed works which may impact these receptors. These environmental receptors are therefore not further assessed in this amendment report.	

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Due to the nature of proposed works, only dust during construction was identified as potential emission to occur. No changes of emissions and discharges during operations are resulting from this amendment.

3.2.1 Dust emissions during construction

Construction works are expected to be of relatively short timeframe and dust emissions are expected to have minimal impact off site. The Delegated Officer considers the consequence of this risk event as **Minor**. Existing dust monitoring networks and dust controls are regulated under the existing licence and the current works approval W6283/2019/1. The Delegated Officer considers the likelihood of receptors being impacted as **Unlikely**.

The Delegated Officer has compared the consequence and likelihood ratings described above and determined the overall rating for the risk of dust emissions during construction as **Low**.

No additional controls have been placed on the licence based on the assessed risk for dust emissions during construction.

The revised licence L4247/1991/13 that accompanies this amendment report authorises emissions associated with the operation of the premises.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Licence holder was provided with draft amendment on (16/7/21)	Applicant waived consultation period on 19/7/21	N/A
Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal (18/6/21)	Mining proposal (Reg ID 96748) under the Mining Act 1978 has been lodged and approved by DMIRS.	N/A
Local Government N/A Authority advised of proposal on (18/6/21)		N/A

5. Conclusion

Based on the assessment in this amendment report, the Delegated Officer has determined that a revised licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process. The amendments reflect the infrastructure changes for TSF2.

Table 5: Summary of licence amendments

Condition no.	Proposed amendments
1.3.1, Table 1.3.1	Updated number of seepage collection trenches to reflect current operations. Updated S1, S2 and S3 are equipped with pumps to reflect current operations. Updated design requirements in accordance with licence amendment application submitted in 2021. This supersedes the previous referenced supporting documents from 2015 in the table.
Figure 7	Location of proposed new trenches for TSF2 embankment raise to 1280 mRL

References

- 1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
- 2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
- 3. DWER 2020, Guideline: Risk Assessments, Perth, Western Australia.
- 4. Talison Lithium Australia Pty Ltd, Works approval application (May 2021) (DWERDT449983)

Talison Lithium Australia Pty Ltd, Revised Licence amendment application (June 2021) (DWERDT466620)

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY			
Application type			
Works approval	\boxtimes	Submitted as works approval, but as per DO discretion this application will be assessed as licence amendment (L4247/1991/13)	
Date application received		11 May 2021	
Applicant and Premises details			
Applicant name/s (full legal name/	/s)	Talison Lithium Australia Pty Ltd	
Premises name		Talison Lithium Mine	
		Talison Lithium Mine Maranup Ford Road, GREENBUSHES WA 6254	
Premises location		Legal description - Mining Tenements M01/3, M01/6, M01/7 M01/8, M01/9, M1/16, G01/1 and G01/02 (As defined in Schedule 1)	
Local Government Authority		Shire of Bridgetown-Greenbushes	
Application documents			
HPCM file reference number:		DER2021/000278	
		Works approval application form	
		Cover letter	
Key application documents (additite to application form):	onal	Supporting document	
о арриошину.		Appendices A-F	
		Premises boundary shape file	
Scope of application/assessme	nt		
		Licence amendment (submitted as works approval by applicant) for TSF2 upgrade works:	
Summary of proposed activities of changes to existing operations.	r	 Embankment raise to 1280 mRL (already approved under licence, but design updated to reflect the ANCOLD (2019) Guidelines on tailings dams update) Extension to buttress Ground enhancements to foundation Additional underdrainage 	

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 5: Processing or beneficiation of metallic or non-	No change to the current approved throughput of	
metallic ore	4 700 000 tonnes beneficiated/year &	
	5 000 000 tonnes of tailings/year	

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes □ No ⊠	Referral decision No: Managed under Part V Assessed under Part IV
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes □ No ⊠	Ministerial statement No: MS 1111 EPA Report No: 1635 For mine expansion (currently regulated under W6283/2019/1)
Has the proposal been referred and/or assessed under the EPBC Act?	Yes □ No ⊠	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes ⊠ No □	Mining lease / tenement ⊠ Expiry: 27/12/2026
Has the applicant obtained all relevant planning approvals?	Yes □ No □ N/A ⊠	Approval: Expiry date: If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes □ No □	No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes □ No ⊠	No clearing is proposed.

Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes □ No ⊠	Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes □ No ⊠	N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes □ No ⊠	N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx)	Yes ⊠ No □	 Part IV of the EP Act Noise Regulations Regulation 17 exemption Part V of the EP Act (WA)- Clearing Department of the Environment and Energy (DoEE) Mining Act 1978 Contaminated Sites Act 2003
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes □ No ⊠	N/A
Is the Premises subject to any EPP requirements?	Yes □ No ⊠	N/A
Is the Premises a known or suspected contaminated site under the Contaminated Sites Act 2003?	Yes ⊠ No □	Classification: Contaminated- restricted use' in 2015 (ID 34013)