



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Silver Lake Resources Limited

Licence: L8449/2010/1

Registered office: Suite 4, Level 3
South Shore Centre
85 South Perth Esplanade
SOUTH PERTH WA 6151

ACN: 108 779 782

Premises address: Mount Monger Operations
Mining tenements M26/129, M26/251, M26/410, M26/38, M26/280,
M26/500, M26/636, M26/325, M26/389, M26/393, M26/94, M26/402,
M26/411, M26/282, M26/415 and M26/167.
KALGOORLIE WA 6430

Issue date: Thursday, 05 September 2013

Commencement date: Monday, 09 September 2013

Expiry date: Thursday, 08 September 2016

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations and legal requirements and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by: Clarrie Green
Licensing Officer

Decision Document authorised by: Tim Gentle
Manager Licensing



Contents

Decision Document	1
Contents	2
1 Purpose of the Decision Document	2
2 Administrative summary	2
3 Executive summary of proposal	3
4 Decision table	4
5 Advertisement and consultation table	7
6 Risk Assessment	8

1 Purpose of the Decision Document

This Decision Document explains how DER has assessed and determined the application for a works approval or licence, and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	12	500 000 tonnes per annual period
	64	400 tonnes per annual period
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No:



		EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.		

3 Executive summary of proposal

Silver Lake were originally licensed under L8449/2010/1 to operate a mobile crushing and screening plant to process waste material from the Daisy Milano underground mine to produce road base for the Mount Monger Operations. Approximately 500 tonnes of road base is produced per month. Wastes produced on site are disposed within trenches on the Waste Rock Dump (WRD).

The landfill currently accepts a maximum of 300 tonnes per annual period of inert waste (plastic, non-recyclable metal, packaging, tyres etc) and 100 tonnes of putrescible waste from site offices and crib rooms as well as cardboard waste. A small amount of tyres are required to be disposed of within the landfill facility, initially 200 and then approximately 50/year. Silver Lake have committed to disposing tyres according to the below:

- burial under a final soil cover of not less than 500 mm;
- in batches separated from each other by at least 100 mm of soil; and
- ensuring that drainage, safety, soil erosion and soil stability is controlled.

This licence is the result of an amendment sought by the proponent to authorise the disposal of asbestos contaminated material (ACM) and soda lime at the site's Class II putrescible landfill at the Daisy Milano Waste Rock Dump. The ACM is contained within the leftover pulps from past drill programs. Approximately 5 m³ of pulps are labelled as ACM and currently stored in paper geochem bags inside cardboard boxes which are stacked on pallets and wrapped in plastic. The soda lime is a material used in closed-circuit breathing environments to absorb CO₂ from exhaled breath. It is estimated that SLR will be required to dispose of 100 kg per annual period.



4 Decision table

All applications are assessed under the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1986*, DER's *Policy Statement - Limits and targets for prescribed premises* (2006) and the risk matrix found in section 6 of the Decision Document. Where other references have been used in making the decision they are detailed in the decision table.

DECISION TABLE			
Works Approval /Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	Former conditions 1.2.1 – 1.2.5	General conditions have been removed from the Licence as they are not enforceable.	N/A
Premises operation	1.2.1	Existing Licence condition 1.2.1 permits Silver Lake to accept up to 400 tonnes per annual period of putrescible and inert wastes including tyres at the landfill. Special Waste Type 1 (ACM) has been added to the waste types permitted for acceptance at the landfill. ACM is currently in storage in a cement-bonded form and is boxed and wrapped suggesting that the likelihood of asbestos fibres being released is rare.	General Provisions of the <i>Environmental Protection Act 1986</i> <i>Environmental Protection (Controlled Waste) Regulations 2004</i>
	1.2.4 and 1.2.5	To ensure that asbestos fibres are not released during disposal of ACM or in the future, condition 1.2.4 has been added to the Licence to require a representative to oversee the ACM's burial and for any large disposal of ACM to be grid referenced on the site plan. The site plan will need to be maintained in accordance with condition 1.2.5.	
	1.2.6	Table 1.2.3 has been amended to require the burial of ACM with at least one metre of clean fill or putrescible waste as soon as practicable after deposit and before being compacted to prevent the release of asbestos fibres as a result of compaction and other landfilling activities.	
	N/A	Soda lime is used to absorb carbon dioxide in closed breathing environments. SLR proposes to place soda lime in plastic garbage bags prior to disposal. The landfill is located within the WRD and is roughly 15 metres above ground while the groundwater level is approximately 30 metres below ground level. Although it is	



DECISION TABLE			
Works Approval /Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>unlikely that will soda lime will seep through to groundwater, the very high pH (approximately 12) and high solubility of the waste increases the likelihood of soil contamination. Safety Data Sheets for various soda lime products recommend that measures are taken to prevent the access of soda lime to the environment.</p> <p>Therefore DER does not consider the disposal of soda lime to a Class II putrescible landfill such as the Mount Monger landfill acceptable. Soda lime has not been added to Table 1.2.1 to authorise material for burial at the Mount Monger Landfill. Waste soda lime will need to be disposed at a licensed premises capable of neutralising the waste prior to disposal or guaranteeing its containment from the environment.</p>	
Fugitive emissions	Former conditions 2.6.1 – 2.6.2	<p>Generic fugitive conditions have been removed from the Licence as they are unenforceable. Furthermore the use of the crushing and screening facility is the most likely source of fugitive dust emissions and current throughputs are significantly lower than authorised throughputs. Therefore dust emissions are not expected to significantly impact the surrounding environment.</p> <p>The substantive offences in the <i>Environmental Protection Act 1986</i> provide enforceable prohibitions for dust emissions that result in pollution or environmental harm.</p>	General provisions of the <i>Environmental Protection Act 1986</i>
Monitoring of inputs and outputs	2.1.1	Silver Lake will be required to monitor waste throughputs and volumes of ACM under the amended Licence. As there is no weighbridge onsite volumes will need to be measured in cubic metres. Each waste type (ACM, inert wastes and putrescible wastes) will need to be measured separately by SLR to justify compliance with Table 1.2.1 which limits the quantity of waste disposed.	N/A
Information	3.2.1 3.3.1	<p>SLR will be required to provide an updated plan showing the position of Special Waste Type 1 disposed of at the Premises under the amended Licence.</p> <p>The former reporting condition requiring any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution, has been removed. This condition duplicated the requirement of s72 of the <i>Environmental Protection Act 1986</i>.</p>	General Provisions of the <i>Environmental Protection Act 1986</i>



DECISION TABLE			
Works Approval /Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence duration	N/A	No changes have been made to the expiry date of the Licence.	N/A



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
22/2/2016	Proponent sent a copy of draft instrument	No comments received.	N/A

6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High