

# **Amendment Report**

| Licence Number | L8562/2011/1  |
|----------------|---|
|                |   |
| Licence Holder | Hamersley Iron Pty Ltd  |
| ACN            | 004 558 276   |
|                |   |
| File Number:   | DER2014/000869-1~2  |
|                |   |
| Premises       | Koodaideri Exploration Camp   |
|                | Mining Tenement ML252SA Section 2, within coordinates –E708,070 N7,510,070; E706,830 N7,507,440; E708,850 N7,506,520; E709,670 N7,508,230; E715,870 N7,505,370; E716,310 N7,506,300 |
|                | NEWMAN WA 6753  |
|                |   |
| Date of Report | 23/06/2020  |
| Decision       | Crent licence emendment   |
| Decision       | Grant licence amendment   |

# 1. Definitions and interpretation

## **Definitions**

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

## Table 1: Definitions

| Term                          | Definition   |  |
|-------------------------------|--|--|
| AACR                          | Annual Audit Compliance Report   |  |
| ACN                           | Australian Company Number  |  |
| AER                           | Annual Environment Report  |  |
| Amendment Report              | refers to this document  |  |
| Category/ Categories/<br>Cat. | categories of Prescribed Premises as set out in Schedule 1 of the EP<br>Regulations  |  |
| CEO                           | means Chief Executive Officer of the Department.   |  |
|                               | "submit to / notify the CEO" (or similar), means either:   |  |
|                               | Director General<br>Department administering the <i>Environmental Protection Act 1986</i><br>Locked Bag 10<br>Joondalup DC WA 6919   |  |
|                               | or: <u>info@dwer.wa.gov.au</u>   |  |
| CS Act                        | Contaminated Sites Act 2003 (WA)   |  |
| 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                        | Environmental Protection Act 1986 (WA)   |  |
| EP Regulations                | Environmental Protection Regulations 1987 (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                | Hamersley Iron Pty Ltd   |  |
| m³                            | cubic metres   |  |
| Minister                      | the Minister responsible for the EP Act and associated regulations   |  |
| MS                            | Ministerial Statement  |  |

| Term                | Definition  |  |
|---------------------|---|--|
| mbgl                | metres below ground level   |  |
| Noise Regulations   | Environmental Protection (Noise) Regulations 1997 (WA)  |  |
| Occupier            | has the same meaning given to that term under the EP Act  |  |
| Prescribed Premises | has the same meaning given to that term under the EP Act  |  |
| Premises            | refers to the premises to which this Amendment Report applies, as specified at the front of this Amendment Report                                   |  |
| Revised licence     | the amended licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report |  |
| Risk Event          | as described in Guidance Statement: Risk Assessment   |  |
| UDR                 | Environmental Protection (Unauthorised Discharges) Regulations 2004<br>(WA)   |  |
| WWTP                | Wastewater Treatment Plant  |  |

## 2. Amendment Description

The following guidance statements have informed the assessment and decision outlined in this Amendment Report:

- Guidance Statement: Regulatory Principles (July 2015);
- Guidance Statement: Setting Conditions (October 2015);
- Guidance Statement: Licence Duration (August 2016);
- Guidance Statement: Decision Making (June 2019);
- Guidance Statement: Risk Assessment (February 2017); and
- Guidance Statement: Environmental Siting (November 2016).

## 2.1. **Purpose and scope of assessment**

An amendment application was received by DWER from the Licence Holder on 05 March 2020 for the following modifications:

Category 54 – the addition of a 186 m<sup>3</sup>/day WWTP3 and spray field to service up to 1800 people (currently 1200 people). The overall capacity of WWTPs onsite will be 558 m3/day, with the addition of this 186 m<sup>3</sup>/day WWTP3, minus the decommissioning of the old resource evaluation WWTP of 46.5 m<sup>3</sup>/day.

## 2.2. Consolidation of licence

As part of this amendment package DWER has consolidated the licence by incorporating changes made under the following Amendment Notice:

- Amendment Notice 1, granted 29 November 2018:
  - Replacement of category 85 with category 54 to facilitate an increase in capacity of WWTP capacity from 46.5 m<sup>3</sup>/day up to 418.5 m<sup>3</sup>/day;
  - Increase in the disposal capacity of category 64 from 50 tonnes per annum to 2,000 tonnes per annum and include Special Waste Type 1 and Special Waste Type 2 to cater for the disposal of asbestos wastes, which may be located during the refurbishment of the camp, and clinical wastes from the medical centre; and
  - > Modifies the Prescribed Premises boundary to boundary coordinates.

The obligations of the Licence Holder have not changed in consolidating the licence. DWER has not undertaken any additional risk assessment of the Premises related to previous Amendment Notices.

In consolidating the licence, the CEO has:

- Updated the format and appearance of the licence;
- Deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the licence holder to obtain the form from the Department's website;
- Revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- Corrected clerical mistakes and unintentional errors.

Previously issued Amendment Notices will remain on the DWER website for future reference and will act as a record of DWER's decision making.

## 3. Other approvals

The Licence Holder holds four licences to take groundwater under section 5C of the *Rights in Water and Irrigation Act 1914* (GWL 158473(6), GWL 164672(7), GWL 171847(3) and GWL 177962).

The Koodaideri Exploration Camp is also subject to Ministerial Statement, MS 999 (EPA Report 1933) under Part IV of the EP Act.

Two Clearing Permits have been issued under Part V of the EP Act (CPS 2725/3 and CPS 4615/7).

The supporting documentation states that an application to the WA Department of Health for approval to upgrade the WWTP3 facility will be lodged with the Shire of East Pilbara.

## 4. Amendment history

Table 2 provides the amendment history for L8562/2011/1.

| Instrument   | Issued     | Amendment   |  |
|--------------|------------|---|--|
| L8562/2011/1 | 15/03/2012 | Licence granted.  |  |
| L8562/2011/1 | 07/03/2013 | Amendment to include category 64 and adjustment to the reporting year   |  |
| L8562/2011/1 | 29/11/2018 | Amendment Notice 1<br>Amendment for the following:  |  |
|              |            | <ul> <li>Replace category 85 with category 54 to facilitate an<br/>increase in capacity of wastewater treatment from 46.5<br/>m<sup>3</sup>/day to 418.5 m<sup>3</sup>/day;</li> </ul>  |  |
|              |            | <ul> <li>Increase the throughput of category 64 from 50 tonnes per<br/>year to 2,000 tonnes per year and include special waste<br/>types 1 and 2. The latter is to cater for the disposal of<br/>asbestos wastes, which may be located during the<br/>refurbishment of the camp and clinical wastes from the<br/>medical centre; and</li> </ul> |  |
|              |            | Changes to the boundary of the prescribed premises.   |  |
| L8562/2011/1 | 23/06/2020 | Amendment Report for an additional 186 m <sup>3</sup> /day WWTP3 and associated spray field to service up to 1800 people (previously 1200).   |  |
|              |            | The total capacity of WWTPs onsite will be 558 m <sup>3</sup> /day. This incorporates the current Category 54 capacity of 418.5 m <sup>3</sup> /day, minus 46.5 m <sup>3</sup> /day for the old resource evaluation WWTP which has been decommissioned, and addition of the 186 m <sup>3</sup> /day WWTP3. Also amalgamated Amendment Notice 1. |  |

 Table 2: Licence amendments

## 5. Location and receptors

Table 3 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

There are no sensitive residential premises within 15km of the Prescribed Premises. Other than the accommodation for the premises, which is not considered a sensitive receptor, the nearest

residential accommodation is over 15km away at the Yandi, Spinifex and Mulga Downs mining camps.

There is no known contamination of the WWTP 3 site.

#### Table 3: Receptors and distance from activity boundary

| Residential and sensitive premises           | Distance from Prescribed Premises           |
|--|---|
| Mine accommodation village                   | 3.2km from the landfill and 950m from WWTP2 |
| Mulga Downs, Yandi and Spinifex mining camps | More than 15km from the premises            |

Table 4 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Environmental receptors and distance from activity boundary

| Environmental receptors  | Distance from Prescribed Premises  |
|--|--|
| Ramsar Sites in Western Australia  | 7km south of the Fortescue Marshes, which is a proposed Ramsar site  |
| Important wetlands – Western Australia                                   | 7km south of the Fortescue Marshes, which is a proposed Ramsar site  |
| Parks and Wildlife Managed Lands and Waters                              | Approximately 31km east of Karijini National Park  |
| Threatened Ecological Communities and<br>Priority Ecological Communities | 7km south of the Fortescue Marshes, which is a proposed<br>Ramsar site, and 13kn northwest of the Fortescue Sand<br>Dunes  |
| Threatened/Priority Flora  | The Department's GIS records 10 species of threatened or priority flora that can be found within 40km of the premises. This includes two priority 1 species (those recorded from generally less than 5 locations) ( <i>Eremophila spongiocarpa</i> and <i>Tecticornia globulifera</i> ), with the others being category 3 or 4. The nearest record of a priority 1 species was 10km to the south west of the premises.   |
|  | The Licence Holder reports that <i>Lepidium catapcynon</i><br>(recorded on the Departments GIS database above) and<br><i>Synostemon hamersleyensis</i> (not reported on the<br>database) have been identified in Ministerial Statement 999<br>as being of conservation significance and protected under<br>that statement. The Licence Holder reports that these<br>species are not within the immediate vicinity of WWTP2 or<br>landfill.   |
| Threatened/Priority Fauna  | The Department's GIS has numerous records of threatened<br>or priority fauna from the surrounding area from the<br>following species: <i>Rhinonicteris aurantia</i> (Pilbara leaf nosed<br>bat, listed as vulnerable), <i>Dasyurus hallucatus</i> (northern<br>quoll, listed as endangered), <i>Liasis olivaceus barroni</i><br>(Pilbara olive python, listed as vulnerable), <i>Falco peregrinus</i><br>(peregrine falcon, listed as vulnerable), <i>Pseudomys<br/>chapmani</i> (pebble mound mouse listed as priority 4) and<br><i>Macroderma gigas</i> (ghost bat, listed as vulnerable). |

## 6. Risk assessment

In undertaking its risk assessment, DWER will identify all potential emissions pathways and potential receptors to establish whether there is a Risk Event which requires detailed risk assessment.

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. Where there is no actual or likely pathway and/or no receptor, the emission will be screened out and will not be considered as a Risk Event. In addition, where an emission has an actual or likely pathway and a receptor which may be adversely impacted, but that emission is regulated through other mechanisms such as Part IV of the EP Act, that emission will not be risk assessed further and will be screened out through Table 6.

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 5 and Table 6 below.

| Risk Events                          |   |                     |  | Continue to detailed risk | Reasoning  |                    |   |  |
|--------------------------------------|---|---------------------|--|---------------------------|--|--------------------|---|--|
| Source                               | s/Activities  | Potential emissions | Potential receptors  | Potential<br>pathway      | Potential adverse<br>impacts                       | assessment         |   |  |
|                                      |   | Noise               | No residences or other   |                           |  | Health and amenity | No  | No receptors nearby.<br>Noise Regulations. |
| Construction,<br>mobilisation<br>and | Vehicle<br>movements on<br>unsealed access<br>roads                         | Dust                | sensitive receptors in<br>proximity. Mulga Downs,<br>Yandi and Spinifex<br>mining camps are more<br>than 15km from the<br>premises.<br>Reduced ability for<br>photosynthesis due to<br>smothering of vegetation. | Air / wind<br>dispersion  | Health and amenity<br>Degradation of<br>vegetation | No                 | <ul> <li>No receptors nearby.</li> <li>Applicant will implement the following controls:</li> <li>Clearing restricted to areas required for construction activities;</li> <li>Rehabilitation of disturbed areas; and</li> <li>Dust suppression (water sprays, water trucks, control of vehicle movement / restricted speeds).</li> </ul> |  |
| positioning of<br>infrastructure     |   | Noise               | No residences or other   |                           | Health and amenity                                 | No                 | No receptors nearby.<br>Noise Regulations.  |  |
|                                      | Placement of new<br>infrastructure<br>including<br>pipelines, tanks<br>etc. | Dust                | sensitive receptors in<br>proximity. Mulga Downs,<br>Yandi and Spinifex<br>mining camps are more<br>than 15km from the<br>premises.<br>Reduced ability for<br>photosynthesis due to<br>smothering of vegetation. | Air / wind<br>dispersion  | Health and amenity                                 | No                 | <ul> <li>No receptors nearby.</li> <li>Applicant will implement the following controls:</li> <li>Clearing restricted to areas required for construction activities;</li> <li>Rehabilitation of disturbed areas; and</li> <li>Dust suppression (water sprays, water trucks, control of vehicle movement / restricted speeds).</li> </ul> |  |

## Table 5: Identification of emissions, pathway and receptors during construction

## Table 6: Risk assessment for proposed amendments during operation

|  |  | Consequence   | Likelihood   | Risk <sup>1</sup>   | Reasoning           |        |  |   |
|--|--|---|--|---------------------|---------------------|--------|--|---|
| Source/Activities*   | Potential emissions  | Potential receptors, pathway and impact   | Applicant controls   | rating <sup>1</sup> | rating <sup>1</sup> | Nisk   | Reasoning  | i |
| WWTP system and<br>pipelines   | <ul> <li>Nutrient-rich wastewater from<br/>the WWTP3 from:</li> <li>pipeline leaks/spills that<br/>transfer treated effluent<br/>from the WWTP to the<br/>spray field; and/or</li> <li>overtopping of the tanks of<br/>the WWTP system.</li> </ul> | Direct discharge to<br>vegetation causing<br>inundation / smothering<br>and impacting on<br>photosynthesis  | Refer to Section 7.  | Moderate            | Unlikely            | Medium | Refer to Section 7.  | ſ |
| Discharge of treated<br>effluent to 9ha spray<br>field   | Nutrient-rich wastewater from<br>the WWTP3 discharging to the<br>spray field   | Direct discharge to 9 ha<br>area of native vegetation<br>that may result in<br>degradation of that<br>vegetation from pooling of<br>the treated effluent,<br>ingress of weeds,<br>attraction of livestock to<br>the spray field area        | Refer to Section 8.  | Minor               | Unlikely            | Medium | Refer to Section 8.  | ſ |
| WWTP3 and spray<br>field   | Odour  | No residences or other<br>sensitive receptors in<br>proximity. Mulga Downs,<br>Yandi and Spinifex mining<br>camps are more than<br>15km from the premises.  | <ul> <li>WWTP3 designed (enclosed tanks) and operated to minimise odours;</li> <li>Regular maintenance and daily inspections be conducted;</li> <li>Design specifications; and</li> <li>Regular maintenance</li> </ul>   | Slight              | Rare                | Low    | Odour emissions would<br>have minimal onsite<br>impacts and, due to the<br>15km distance to offsite<br>sensitive receptors, the<br>risk event may only<br>occur in exceptional<br>circumstances. | ļ |
| Sludge removal from<br>the A/D Tank is<br>pumped to sludge<br>drying beds adjacent<br>to the WWTP3 | Waste sludge or filtrate<br>containing nutrient-rich<br>concentrations   | Direct discharge to soils<br>and vegetation in the event<br>of a spillage of waste<br>sludge, rupture of the<br>filtrate pipelines or<br>containment issues with<br>the sludge drying beds and<br>potential infiltration to<br>groundwater. | <ul> <li>Sludge drying beds are a concrete enclosure divided into two separate beds;</li> <li>Two layers of filter sand to be on the floor of the concrete beds;</li> <li>Concrete floor in each bed contains a slotted under drain that collects filtrate and directs it to a collection sump; and</li> <li>Filtrate from sludge drying beds is transferred back to the WWTP3.</li> </ul> | Slight              | Unlikely            | Low    | Waste sludge or filtrate<br>reaching the<br>environmental may result<br>in minimal onsite impacts<br>and will probably not<br>occur in most<br>circumstances.                                    | 1 |
| Removal of old<br>resource evaluation<br>WWTP from the<br>licence                                  | N/A  | N/A   | N/A  | N/A                 | N/A                 | N/A    | N/A  |   |

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)

Regulatory controls (refer to conditions of the granted instrument)

Refer to Section 7.

Refer to Section 8.

Infrastructure controls have been included in the licence amendment.

Infrastructure controls have been included in the licence amendment.

No modifications to the licence required as this WWTP is not directly mentioned in the licence.

# 7. Risk Assessment – WWTP pipeline leaks/spills and/or overtopping

Raw sewage will be transferred from the Koodaideri mine village treatment system across to the WWTP3 for treatment through the following stages:

- Influent Screening and Balance Tank;
- Anoxic Tank;
- Denitrification step;
- Aeration / Decant Tank sequence;
- Final Effluent Discharge Tank; and
- Emergency overflows from the Anoxic Tank, Aeration / Decant Tank and Effluent Tank to the Emergency Overflow Pond (and the other tanks are connected to these); and
- Emergency Overflow Pond (already in place).

There is a single temporary sewage transfer pipeline from the Koodaideri Village to the WWTP compound. This temporary pipeline feeds a balance tank that directs the sewage to WWTP2. This temporary pipeline will be decommissioned when the new permanent pipeline is in place.

The new permanent pipeline will follow the permanent access road alignment from the Koodaideri Village to the WWTP compound and will feed a balance tank that directs sewage to WWTP2 and WWTP3.

#### 7.1.1 Description of leaks/spills and/or overtopping

Leaks/spills of pipelines and/or overtopping of the WWTP3 would only occur in the event of a rupture or malfunction of the operating system.

#### 7.1.2 Identification and general characterisation of emission

The WWTP3 will be treating raw sewage so discharges from pipelines leaks/spills or from the WWTP3 may be untreated raw sewage or partially treated sewage that contains elevated levels of 5 day Biochemical Oxygen Demand, Total Suspended Solids, Total Nitrogen, Total Phosphorus, pH, Residual free chlorine and Thermo-tolerant Faecal Coliforms.

#### 7.1.3 Description of potential adverse impact from the emission

Discharge of raw sewage or partially treated sewage to the environment may contaminate soils, vegetation and potentially groundwater. However, the nearest drainage line is approximately 400m from where the WWTP3 will be located and groundwater is approximately 70mbgl.

#### 7.1.4 Criteria for assessment

Raw sewage and partially treated sewage does not meet criteria for allowable discharge to the environment and discharge should only occur as a result of a rupture or malfunction of equipment so would be an UDR.

#### 7.1.5 Licence holder controls

This assessment has reviewed the controls set out in Table 7 below.

| Site<br>infrastructure       | Description   | Operation details  |
|------------------------------|---|--|
| Leaks/spills of<br>pipelines | <ul> <li>Permanent pipeline installed below ground within the service corridor that contains power, communications and sewer infrastructure lines; and</li> <li>Design, manufacture and installation of the permanent pipeline is compliant with all relevant Australian Standards and pressure tested to Australian Standards.</li> </ul>  | • Regular maintenance and daily inspections to be conducted as there are no leak detection features along the permanent pipelines. |
| Overtopping of<br>WWTP3      | <ul> <li>Anoxic Tank, the Aeration / decant<br/>Tank and Effluent Tank have<br/>emergency overflows to the HDPE<br/>lined Emergency Overflow Pond:</li> <li>Capacity 2,000,000L; (in<br/>excess of 3 days sewage<br/>production with both WWTPs<br/>fully loaded (1,674,000L);</li> <li>Dimensions of 36m x 36m and<br/>2m deep;</li> <li>Freeboard of 300mm;</li> <li>Excessive levels in the other<br/>process tanks will eventually<br/>gravitate to these tanks and<br/>discharge to the emergency<br/>overflow pond thus preventing<br/>overtopping of tanks; and</li> <li>High level audible and visual<br/>alarms will be installed at the plant<br/>to notify maintenance personnel of<br/>potential issues with the facility;</li> <li>All tanks in both WWTPs are<br/>equipped with overflow piping<br/>which directs wastewater to the<br/>Emergency Overflow Pond;</li> <li>The Emergency Overflow Pond is<br/>equipped with a pump station to<br/>transfer sewage from the<br/>Emergency Overflow Pond back to<br/>the WWTPs balance tanks;</li> <li>WWTP compound, including the<br/>Emergency Overflow Pond is<br/>bunded so that any leaks/spills<br/>report to the Emergency Overflow<br/>Pond.</li> </ul> | Regular maintenance and daily inspections to be conducted.   |

## Table 7: Licence Holder's proposed controls for pipeline leaks/spills and/or overtopping

## 7.1.6 Key findings

The Delegated Officer has reviewed the information regarding pipeline leaks/spills and/or overtopping and has found:

- 1. Raw sewage and partially treated sewage does not meet criteria for allowable discharge to the environment and discharge should only occur as a result of a rupture or malfunction of equipment.
- 2. Applicant has controls in place with the use of an Emergency Overflow Pond to capture leaks/spills and overtopping and regular maintenance and daily inspections.

## 7.1.7 Consequence

If raw sewage or partially treated sewage is discharged to the environment, then the Delegated Officer has determined that the impact of the discharge could have mid-level onsite impacts, low level local scale offsite impacts, minimal wider scale offsite impacts and Specific Consequence Criteria (for environment) are at risk of not being met. Therefore, the Delegated Officer considers the consequence of additional seepage to be **moderate**.

## 7.1.8 Likelihood of Risk Event

The Delegated Officer has determined that the likelihood discharge of raw sewage or partially treated sewage from pipelines or overtopping will probably not occur in most circumstances. Therefore, the Delegated Officer considers the likelihood of additional seepage to be **unlikely**.

## 7.1.9 Overall rating of pipeline leaks/spills and/or overtopping

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix (Table 10) and determined that the overall rating for the risk of raw sewage or partially treated sewage discharge is **medium**.

## 8. Risk Assessment – Treated effluent discharge to spray field

## 8.1.1 Description of effluent discharge

Treated effluent from the WWTP3 will be discharged to the 9 ha spray field via 11 rows with, on average 15 impulse sprinklers per row (approximately 165 sprinklers).

## 8.1.2 Identification and general characterisation of emission

The WWTP3 has been designed with the following treated effluent quality targets shown in Table 8.

| Parameters                         | WWTP 3 Target<br>Values | Discharge<br>Criteria <sup>1</sup> | WWTP3 Loading<br>Rates Target Values |
|------------------------------------|-------------------------|------------------------------------|--------------------------------------|
| 5 day Biochemical Oxygen<br>Demand | <20mg/L                 | 20 – 30mg/L                        | N/A                                  |
| Total Suspended Solids             | <30mg/L                 | 25 – 40mg/L                        | N/A                                  |
| Total Nitrogen                     | <30mg/L                 | 20 – 50 mg/L                       | 226.3                                |

#### **Table 8: Water Quality Discharge Criteria**

| Total Phosphorus                    | <7.5mg/L         | 6 – 12 mg/L       | 56.575 |
|-------------------------------------|------------------|-------------------|--------|
| рН                                  | 6.5 – 8.5        | -                 | N/A    |
| Residual free chlorine              | >0.5mg/L         | -                 | N/A    |
| Thermo-tolerant Faecal<br>Coliforms | <1,000 cfu/100mL | <10,000 cfu/100mL | N/A    |

Note 1: NWQMS, 1997

Key finding: The WWTP3 is designed to meet the most applicable guidelines for concentrations of parameters and loading rates are reasonable.

## 8.1.3 Description of potential adverse impact from the emission

Discharge of treated effluent to the spray field could result in pooling of wastewater, which could result in attraction of livestock and native fauna. Discharge of the treated wastewater could also lead to the ingress of evasive weeds species and deterioration of native vegetation that is not conditioned to this surplus water supply.

## 8.1.4 Criteria for assessment

NWQMS, 1997 for concentrations of parameters in treated effluent.

## 8.1.5 Applicant/Licence Holder controls

This assessment has reviewed the controls set out in Table 9 below.

#### Table 9: Licence Holder's proposed controls for treated effluent discharge to spray field

| Site<br>infrastructure | Description  | Operation details  |
|------------------------|--|--|
| WWTP3                  | • Designed to treat sewage to a treated effluent quality as per Section 8.1.2.   | <ul> <li>Monitoring of treated effluent will occur weekly during commissioning and quarterly following commissioning; and</li> <li>Regular maintenance and daily inspections to be conducted.</li> </ul> |
| Spray field            | <ul> <li>Sized to 9ha so that loading rates for Total Nitrogen and Total Phosphorus are met and to prevent pooling and running off of treated effluent;</li> <li>Spray field to be fully fenced and signposted; and</li> <li>11 rows with, on average 15 impulse sprinklers per row (approximately 165 sprinklers).</li> </ul> | <ul> <li>Regular maintenance and daily inspections to be conducted.</li> <li>Weed species are managed as part of a broader program.</li> </ul>   |

## 8.1.6 Key findings

The Delegated Officer has reviewed the information regarding treated effluent discharge to spray field and has found:

- 1. The WWTP3 is designed to meet the most applicable guidelines for concentrations of parameters and loading rates are reasonable.
- 2. Weekly monitoring of treated effluent quality during commissioning and quarterly monitoring of treated effluent quality during operations.

#### 8.1.7 **Consequence**

If discharge of treated effluent to the spray field occurs, then the Delegated Officer has determined that the impact of the discharge will have low level onsite impacts, minimal local scale offsite impacts, not detectable wider scale offsite impacts, with Specific Consequence Criteria (for environment) likely to be met. Therefore, the Delegated Officer considers the consequence of discharge of treated effluent to the spray field to be **minor**.

#### 8.1.8 Likelihood of Risk Event

The Delegated Officer has determined that the likelihood of adverse environmental impacts from discharge of treated effluent to the spray field occurring will probably not occur in most circumstances. Therefore, the Delegated Officer considers the likelihood of discharge of treated effluent to the spray field to be **unlikely**.

## 8.1.9 Overall rating of treated effluent discharge to the spray field

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix (Table 10) and determined that the overall rating for the risk of discharge of treated effluent to the spray field is **medium**.

A risk rating will be determined for risk events in accordance with the risk rating matrix set out in Table 10 below.

#### Table 10: Risk rating matrix

| Likelihood     | Consequence |        |          |         |         |
|----------------|-------------|--------|----------|---------|---------|
|                | Slight      | Minor  | Moderate | Major   | Severe  |
| Almost certain | Medium      | High   | High     | Extreme | Extreme |
| Likely         | Medium      | Medium | High     | High    | Extreme |
| Possible       | Low         | Medium | Medium   | High    | Extreme |
| Unlikely       | Low         | Medium | Medium   | Medium  | High    |
| Rare           | Low         | Low    | Medium   | Medium  | High    |

## 9. Consultation

#### Table 11: Summary of consultation

| Method   | Comments received | DWER response  |
|--|-------------------|----------------|
| Local Government Authority<br>advised of proposal    | N/A               | N/A            |
| Applicant referred draft<br>documents (19 June 2020) | See Appendix 2    | See Appendix 2 |

## **10.** Conclusion

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

## **10.1.** Summary of amendments

Table 10 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.

#### Table 12: Licence amendments

| Condition No.             | Proposed amendments   |  |
|---------------------------|---|--|
| Premises details          | Updated as per Amendment Notice 1   |  |
| Prescribed premises table | Category 64 Putrescible landfill of 50 tonnes per year updated to 2,000 tonnes per year as per Amendment Notice 1.                                      |  |
|                           | Category 85 Sewage facility of 46.5 m <sup>3</sup> /day updated to Category 54 Sewage facility of 558 m <sup>3</sup> /day.                              |  |
| Condition 1               | New condition - Implemented design and construction/installation requirements for the WWTP3, spray field and sludge drying beds.                        |  |
| Condition 2               | New condition - Environmental Compliance Report requirement to ensure that infrastructure is constructed as per construction/installation requirements. |  |
| Condition 3               | New condition - Explanations for any departures from the  |  |

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|              | construction/installation requirements or works not conducted,  |  |
|--------------|---|--|
|              | •   |  |
| Condition 4  | New condition - Commissioning commencement to only occur when<br>Environmental Compliance Report submitted.   |  |
| Condition 5  | New condition - Commissioning requirements and timeframe.   |  |
| Condition 6  | New condition - The WWTP3 and spay field to be operated in accordance with the licence conditions following the commissioning period.   |  |
| Condition 7  | Existing condition – Unchanged.   |  |
| Condition 8  | Existing condition – modified as per Amendment Notice 1 to update "irrigation area" to spray fields"  |  |
| Condition 9  | Existing condition – modified from "WWTP" to "WWTPs".   |  |
| Condition 10 | Existing condition – Unchanged.   |  |
| Condition 11 | Existing condition – modified "WWTP" to "WWTPs".  |  |
|              | Included WWTP3 in the title of Table 3.   |  |
|              | Included WWTP3 in the quarterly monitoring of the treated effluent and included treated effluent monitoring during commissioning of WWTP3.  |  |
| -            | Removal of previous condition referencing NATA and Standard Methods for Examination of Water and Wastewater – APHA-AWWA-WEF. Replaced by new Condition 13.  |  |
| -            | Removal of previous condition referencing the relevant parts of Australian Standard 5667. Replaced by new Condition 13.   |  |
| Condition 12 | New condition – to conduct daily inspections of the WWTP2 and WWTP3 pipelines and WWTP2 and WWTP3 compounds.  |  |
| Condition 13 | New condition – to use AS/NZS 5667 and NATA.  |  |
| Condition 14 | New condition – standard monitoring frequency.  |  |
| Condition 15 | Existing condition – updated to remove the targets for treated effluent quality and instead "report on and discuss" these results of the treated effluent quality obtained. This was amended as part of Amendment Notice 1. |  |
| Condition 16 | Existing condition – Unchanged.   |  |
| Condition 17 | Existing condition – Unchanged.   |  |
| -            | Removal of liquid chemical storage conditions and replaced by Conditions 18 and 19.   |  |
| Condition 18 | New condition as per DWER Conditions Library.   |  |
| Condition 19 | New condition as per DWER Conditions Library.   |  |
| Condition 20 | Existing condition – Unchanged.   |  |
| Condition 21 | Existing condition – Unchanged.   |  |
| Condition 22 | Condition implemented as part of Amendment Notice 1 for clinical and asbestos   |  |

|                  | wastes.  |
|------------------|--|
| Condition 23     | Existing condition – Unchanged.  |
| Condition 24     | Existing condition – Unchanged.  |
| -                | Removal of existing AER condition and replaced with Condition 25.  |
| Condition 25     | New AER condition as per DWER Conditions Library.  |
| -                | Removal of existing AACR condition and replaced with Condition 26.   |
| Condition 26     | New AACR condition as per DWER Conditions Library.   |
| -                | Removal of construction conditions for WWTP2. Compliance Report received 08<br>July 2019 (DWERDT176969) and DWER response 01 October 2019<br>(A1828001). |
| -                | Removal of construction conditions for WWTP2. Compliance Report received 08 July 2019 (DWERDT176969) and DWER response 01 October 2019 (A1828001).       |
| -                | Removal of construction conditions for WWTP2. Compliance Report received 08<br>July 2019 (DWERDT176969) and DWER response 01 October 2019<br>(A1828001). |
| -                | Removal of construction conditions for WWTP2. Compliance Report received 08<br>July 2019 (DWERDT176969) and DWER response 01 October 2019<br>(A1828001). |
| Condition 27     | New complaints conditions as per DWER Conditions Library.  |
| Condition 28     | New information/recording condition as per DWER Conditions Library.  |
| Condition 29     | New information/recording condition as per DWER Conditions Library.  |
| Definitions      | Updated to remove and include definitions.   |
| Schedule 1: Maps | Updated maps to include relevant infrastructure.   |

## ALANA KIDD MANAGER, RESOURCE INDUSTRIES

INDUSTRY REGULATION An officer delegated by the CEO under section 20 of the EP Act

## Appendix 1: Key documents

|    | Document title   | In text ref  | Availability  |
|----|--|--------------|---|
| 1  | Licence L8562/2011/1– Koodaideri<br>Exploration Camp   | L8562/2011/1 | accessed at <u>www.dwer.wa.gov.au</u>   |
| 2  | Ministerial Statement 999  | MS 999       | accessed at <u>www.epa.wa.gov.au/</u>   |
| 5  | DER, July 2015. <i>Guidance Statement:</i><br><i>Regulatory principles.</i> Department of<br>Environment Regulation, Perth.  | N/A          | accessed at <u>www.dwer.wa.gov.au</u>   |
| 6  | DER, October 2015. <i>Guidance</i><br><i>Statement: Setting conditions.</i><br>Department of Environment<br>Regulation, Perth.   | N/A          |   |
| 7  | DER, August 2016. <i>Guidance</i><br><i>Statement: Licence duration.</i><br>Department of Environment<br>Regulation, Perth.  | N/A          |   |
| 8  | DER, November 2016. <i>Guidance</i><br><i>Statement: Risk Assessments</i> .<br>Department of Environment<br>Regulation, Perth.   | N/A          |   |
| 9  | DER, June 2019. <i>Guidance</i><br><i>Statement: Decision Making.</i><br>Department of Environment<br>Regulation, Perth.   | N/A          |   |
| 10 | Email titled "RTIO Licence<br>Amendment Application - Koodaideri<br>L8562 - Cat 54 WWTP" dated<br>05/03/2020 5:28pm and authored by<br>Rio Tinto                                   | N/A          | DWER records (A1873979)   |
| 11 | Email titled "RE: [External] RE:<br>L8562/2011/1 Koodaideri Exploration<br>Camp Request for Further<br>Information" dated 20/05/2020 2:52pm<br>and authored by Rio Tinto           | N/A          | DWER records (A1895860)   |
| 12 | Email titled "RE: [External] FW:<br>APPLICANT NOTIFICATION -<br>NOTICE OF PROPOSED<br>AMENDMENT TO LICENCE<br>L8562/2011/1" dated 19 June 2020<br>2:53pm and authored by Rio Tinto | N/A          | DWER records (A1904840)   |
| 13 | National Water Quality Management<br>Strategy, Australian Guidelines for<br>Sewage systems – Effluent<br>Management, 1997  | NWQMS, 1997  | Available at<br>https://www.waterquality.gov.au/sit<br>es/default/files/documents/effluent-<br>management.pdf |

## **Appendix 2: Summary of Licence Holder comments**

The Licence Holder was provided with the draft Amendment Report on 28 May 2020 for review and comment. The Licence Holder responded on 19 June 2020 and the following comments were received on the draft Amendment Report.

| Condition                                    | Summary of licence holder comment   | DWER response   |
|--|---|---|
| Licence history                              | The Licensee requests that reference to the Resource<br>Evaluation WWTP being decommissioned should be<br>amended to 'no longer operational'.<br>The Resource Evaluation WWTP has not yet been<br>decommissioned therefore it's recommended that the  | Updated as requested.   |
| Condition 1: Table 1:<br>Sludge drying beds. | wording be amended.The Licensee requests that the reference 'Filtrate from<br>sludge drying beds is transferred back to the WWTP3'<br>should be amended to "Dried sludge material is to be<br>transferred offsite by a licensed waste carrier, or<br>transported to the approved site landfill for appropriate<br>disposal. | Updated to include the sludge disposal<br>requirements, however, the filtrate transfer back<br>to the WWTP3 is to be included in the licence. |
| Condition 12:                                | The process requires that the sludge is disposed to an appropriately licensed landfill.<br>The Licensee requests that Condition 12 be amended to 'The licence holder shall conduct daily inspections of the   | Updated as requested.   |
|  | WWTP2 and WWTP3 aboveground pipelines and the route following the placement of the underground pipeline'.   |   |
| Definitions: Term:<br>WWTP2                  | The Licensee requests that the definition be amended to<br>'Wastewater Treatment Plant 2 – the 1200EP facility at the<br>eastern end of the premises'.  | Updated as requested.   |
| Definitions: Term:<br>WWTP3                  | The Licensee requests that the definition be amended to<br>'Wastewater Treatment Plant 3 – the 600EP facility to the<br>west of WWTP2'.   | Updated as requested.   |