



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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|                          |                                                                                            |
|--------------------------|--------------------------------------------------------------------------------------------|
| <b>Licence Number</b>    | L8880/2015/1                                                                               |
| <b>Licence Holder</b>    | IGO Nova Pty Ltd                                                                           |
| <b>ACN</b>               | 146 091 527                                                                                |
| <b>File Number</b>       | DER2015/000284-1                                                                           |
| <b>Premises</b>          | Nova Nickel Project<br>Eyre Highway<br>FRASER RANGE WA 6443<br><br>Mining Tenement M28/376 |
| <b>Date of Report</b>    | 9 September 2020                                                                           |
| <b>Proposed Decision</b> | Revised licence granted                                                                    |

**Carmen Standring**  
**A/MANAGER, RESOURCE INDUSTRIES**  
**REGULATORY SERVICES**

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

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## 1. Decision summary

Licence L8880/2015/1 is held by IGO Nova Pty Ltd (Licence Holder) for the Nova Nickel Project (the Premises) located on Mining Tenement M28/376, Eyre Highway, Fraser Range 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 L8880/2015/1 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

## 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://www.der.wa.gov.au>.

### 2.2 Application summary

On 20 June 2020, the Licence Holder submitted an application to the department to amend Licence L8880/2015/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendment is being sought:

- Operation of putrescible landfill facility (Class II or III): Increase capacity of landfill site from 1,000 tonnes per annual period to 2,000 tonnes per annual period. The Licence Holder proposes to extend the landfill site perimeter as per Figure 4. This increase allows for disposal of contractor generated waste into the landfill that is currently sent offsite. The extended area and increased throughput will also allow for waste management for future Prescribed Premises operations.

This amendment is limited only to changes to Category 64 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 5, 52 and 54 have been requested by the Licence Holder.

Table 1 below outlines the proposed changes to the existing Licence.

**Table 1: Proposed throughput capacity changes**

| Category | Current design capacity        | Proposed design capacity       | Description of proposed amendment                                                                                         |
|----------|--------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| 64       | 1,000 tonnes per annual period | 2,000 tonnes per annual period | Proposal to increase the design landfill capacity of the putrescible landfill facility (class II or III) on the Premises. |

## 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 *Guidance Statement: Risk Assessments* (DER 2017).

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 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Construction              |                                                                                                  |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Dust                      | Clearing and earthworks for extension of landfill area and construction of boundary fence.       | Air/windborne pathway.                                                               | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Noise                     |                                                                                                  |                                                                                      | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Sediment laden stormwater |                                                                                                  | Overland runoff potentially causing ecosystem disturbance or impacting surface water | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Operation                 |                                                                                                  |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Dust                      | Unloading and storage of material in landfill.<br><br>Covering landfill<br><br>Vehicle movements | Air/windborne pathway.                                                               | Applicant has not proposed controls.<br><br>The applicable controls from the existing licence are outlined below:<br><br>Waste is levelled and compacted as soon as practicable after it is discharged.<br><br>Waste is placed and compacted to ensure all faces are stable and capable of retaining rehabilitation material.<br><br>Rehabilitation of a cell or phase takes place within 12 months after disposal in that cell or phase has been completed.<br><br>Cover requirements:<br><br>a) Inert Waste Type 2 (Tyres): To be covered at least fortnightly. Waste deposited shall be covered with sufficient quantities of Type 1 inert waste or clean fill to prevent the |

| Emission                  | Sources                                                                                                                                                         | Potential pathways                                                                           | Proposed controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           |                                                                                                                                                                 |                                                                                              | <p>spread of fire and harbouring of disease vectors;</p> <p>b) Putrescible Waste: To be covered at least fortnightly with sufficient quantities of Type 1 inert waste or clean fill to ensure no waste is exposed; and</p> <p>c) Inert Waste Type 1: No cover required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Noise                     | Unloading and storage of material                                                                                                                               |                                                                                              | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Sediment laden stormwater | Vehicle movements                                                                                                                                               | Overland runoff potentially causing ecosystem disturbance or impacting surface water quality | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Leachate                  | <p>Leachate from putrescible waste stored as landfill</p> <p>Leachate from potentially contaminated stormwater – generated from rainfall over landfill area</p> | Overland runoff potentially causing ecosystem disturbance or impacting surface water         | <p>Applicant has not proposed controls.</p> <p>The applicable controls from the existing licence are outlined below:</p> <ul style="list-style-type: none"> <li>The separation distance between the base of the landfill and the highest groundwater level shall not be less than 2 metres.</li> <li>Disposal of waste by landfilling shall only take place within the Landfill Area shown in Schedule 1.</li> <li>No waste shall be temporarily stored or landfilled within 35 metres from the boundary premises.</li> </ul>                                                                                                                                                                                                                     |
|                           | Leachate from used tyre disposal                                                                                                                                |                                                                                              | <p>Applicant has advised that tyres are removed at least monthly by a recycling contractor at least monthly and, at most, 20 used tyres are held onsite prior to removal. No tyres are disposed of to the landfill. (Nova, 2020)</p> <p>The applicable controls from the existing licence are outlined below:</p> <ul style="list-style-type: none"> <li>Tyres to be covered at least fortnightly. Waste deposited shall be covered with sufficient quantities of Type 1 inert waste or clean fill to prevent the spread of fire and harbouring of disease vectors.</li> <li>Tyres shall only be landfilled: <ul style="list-style-type: none"> <li>(a) in batches separated from each other by at least 100mm of soil and</li> </ul> </li> </ul> |

| Emission                                  | Sources                              | Potential pathways                                        | Proposed controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------|--------------------------------------|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                                      |                                                           | <p>each consisting of not more than 40 cubic metres of tyres reduced to pieces; or</p> <p>(b) in batches separated from each other by at least 100 mm of soil and each consisting of not more than 1,000 whole tyres.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Odour                                     | Putrescible waste stored as landfill | Air/windborne pathway                                     | Applicant has not proposed controls.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Waste Material                            | Landfill                             | Fauna                                                     | <p>Applicant has not proposed controls.</p> <p>The applicable controls from the existing licence are outlined below:</p> <ul style="list-style-type: none"> <li>• Waste is placed and compacted to ensure all faces are stable and capable of retaining rehabilitation material</li> <li>• Rehabilitation of a cell or phase takes place within 12 months after disposal in that cell or phase has been completed.</li> <li>• Putrescible Waste: To be covered at least fortnightly with sufficient quantities of Type 1 inert waste or clean fill to ensure no waste is exposed.</li> <li>• Security measures at the landfill site: <ul style="list-style-type: none"> <li>a) Erect and maintain suitable fencing to prevent unauthorised access to the site</li> <li>b) Ensure that any entrance gates to the premises are securely locked when the premises are unattended; and</li> <li>c) Undertake regular inspections of all security measures and repair damage as soon as practicable.</li> </ul> </li> </ul> |
| Air and drainage emissions from tyre fire | Used tyres storage areas             | Direct to air and released surface drainage via firewater | <p>Applicant has advised that tyres are removed at least monthly by a recycling contractor at least monthly and, at most, 20 used tyres are held onsite prior to removal. No tyres are disposed of to the landfill. (Nova, 2020).</p> <p>The applicable controls from the existing licence are outlined below:</p> <ul style="list-style-type: none"> <li>• Tyres to be covered at least fortnightly. Waste deposited shall be covered with sufficient quantities of Type 1 inert waste or clean fill to</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Emission | Sources | Potential pathways | Proposed controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------|---------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          |         |                    | <p>prevent the spread of fire and harbouring of disease vectors.</p> <ul style="list-style-type: none"> <li>• Tyres shall only be landfilled: <ul style="list-style-type: none"> <li>a) In batches separated from each other by at least 100 mm of soil and each consisting of not more than 40 cubic metres of of tyres reduced to pieces; or</li> <li>b) In batches separated from each other by at least 100 mm of soil and each consisting of not more than 1,000 whole tyres.</li> </ul> </li> </ul> |

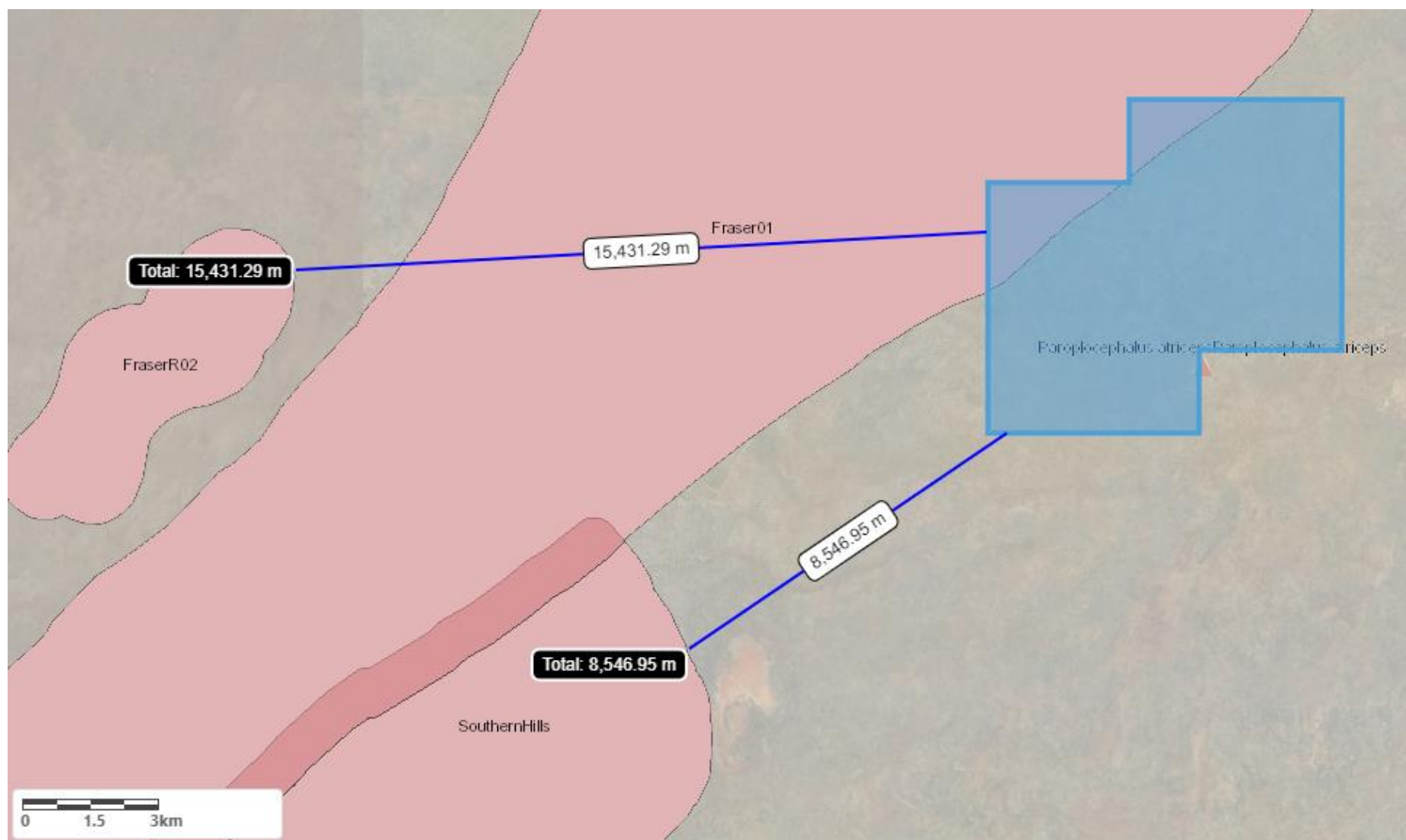
### 3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), 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 environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guidance Statement: Environmental Siting* (DER 2016)). There are no human receptors located within 40km of the Premises (the Fraser Range Caravan Park and the Fraser Range Station ~40 km southwest of the Premises).

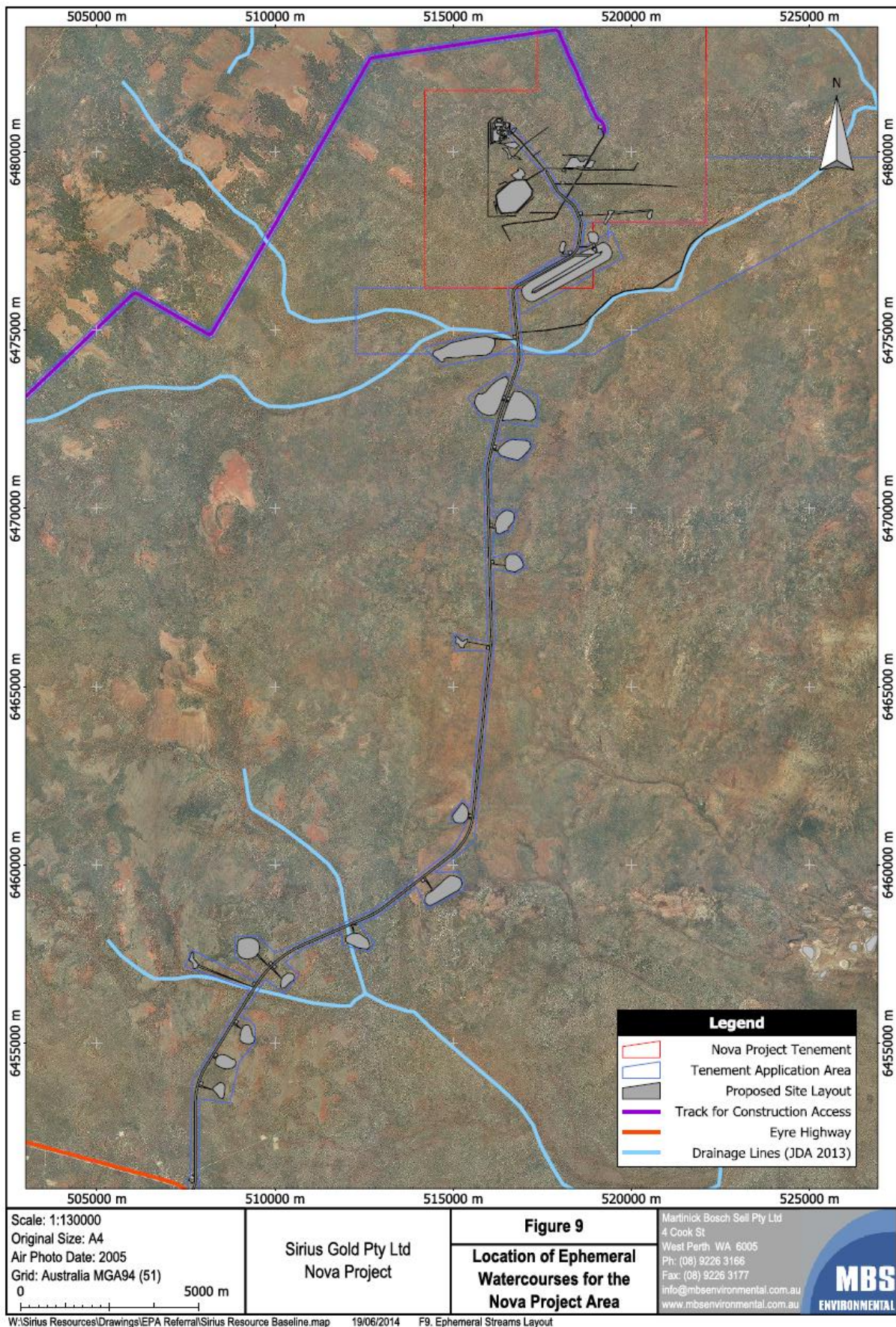
**Table 3 Sensitive environmental receptors and distance from prescribed activity**

| Environmental receptors                          | Distance from prescribed activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fraser Range Vegetation Complex Priority 1 PEC   | Fraser01 is within the northwest corner of prescribed premises boundary approximately 1.83km from the extended area of the landfill.<br>Refer to Figure 1.                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Southern Hills Vegetation Complex Priority 1 PEC | ~8.6km southwest of the prescribed premises boundary.<br>Refer to Figure 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Groundwater                                      | Groundwater is approximately 40m below the surface and saline.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Surface drainage lines                           | <p>Nearest surface drainage feature (ephemeral) is outside prescribed premise. Approximately 3-5 km from landfill site.</p> <p>Flow modelling from JDA (2013) cited in DWER (2017), indicated that surface runoff from Fraser Range drains in a northeast direction, flowing along the south of the project. Runoff from the Project joins this channel adjacent to the eastern boundary of the Project area. In the central eastern section of the study area there are a number of small depressions which drain local catchments.</p> <p>Refer to Figure 2, Figure 3 and Figure 4.</p> |



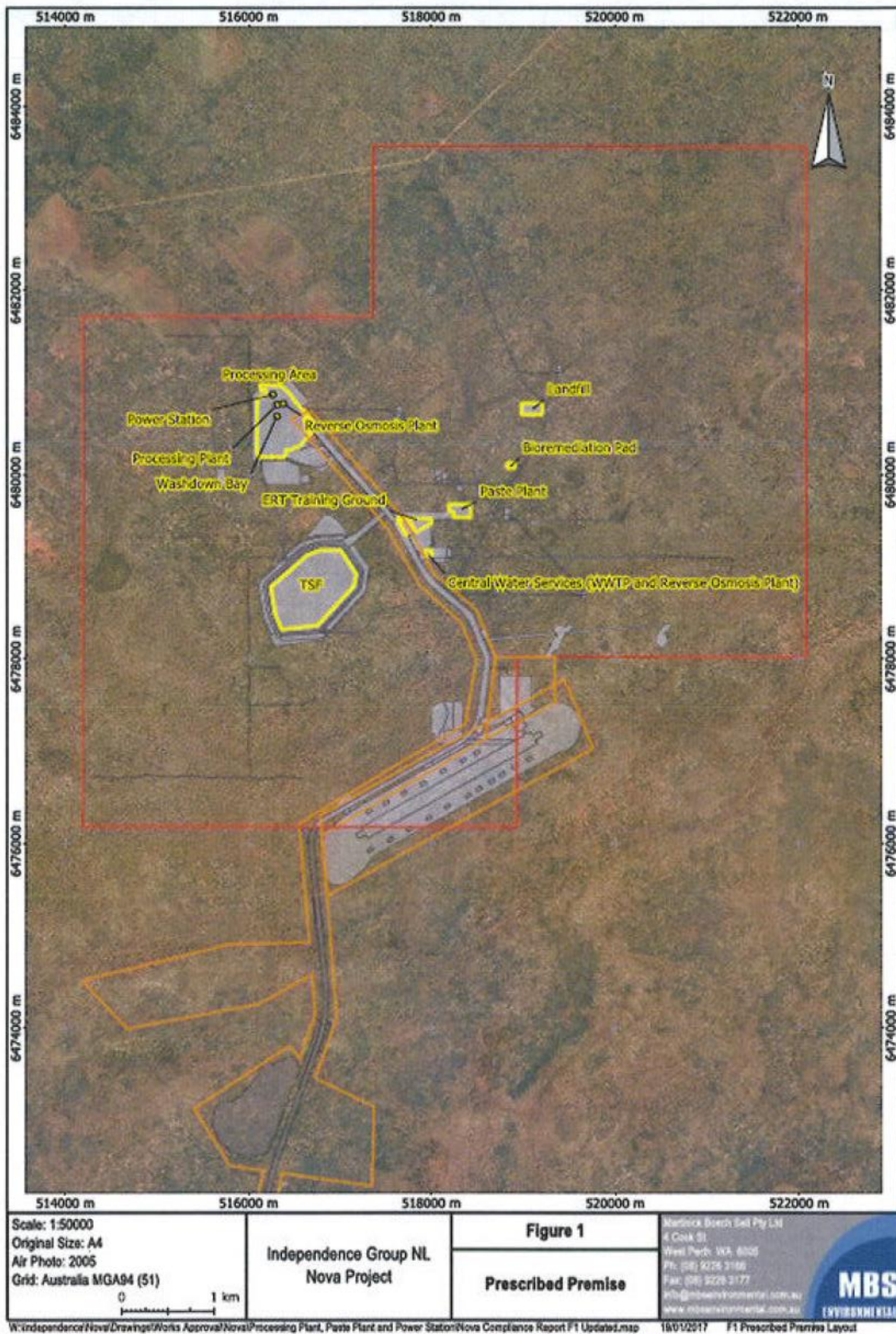
**Figure 1: Distance to sensitive receptors : PECs : Southern Hills and Fraser Range Vegetation Complexes and threatened fauna (*Paroplocephalus atriceps*) . Note: Area shaded in blue is the Premises (Mining Tenement M28/376).**





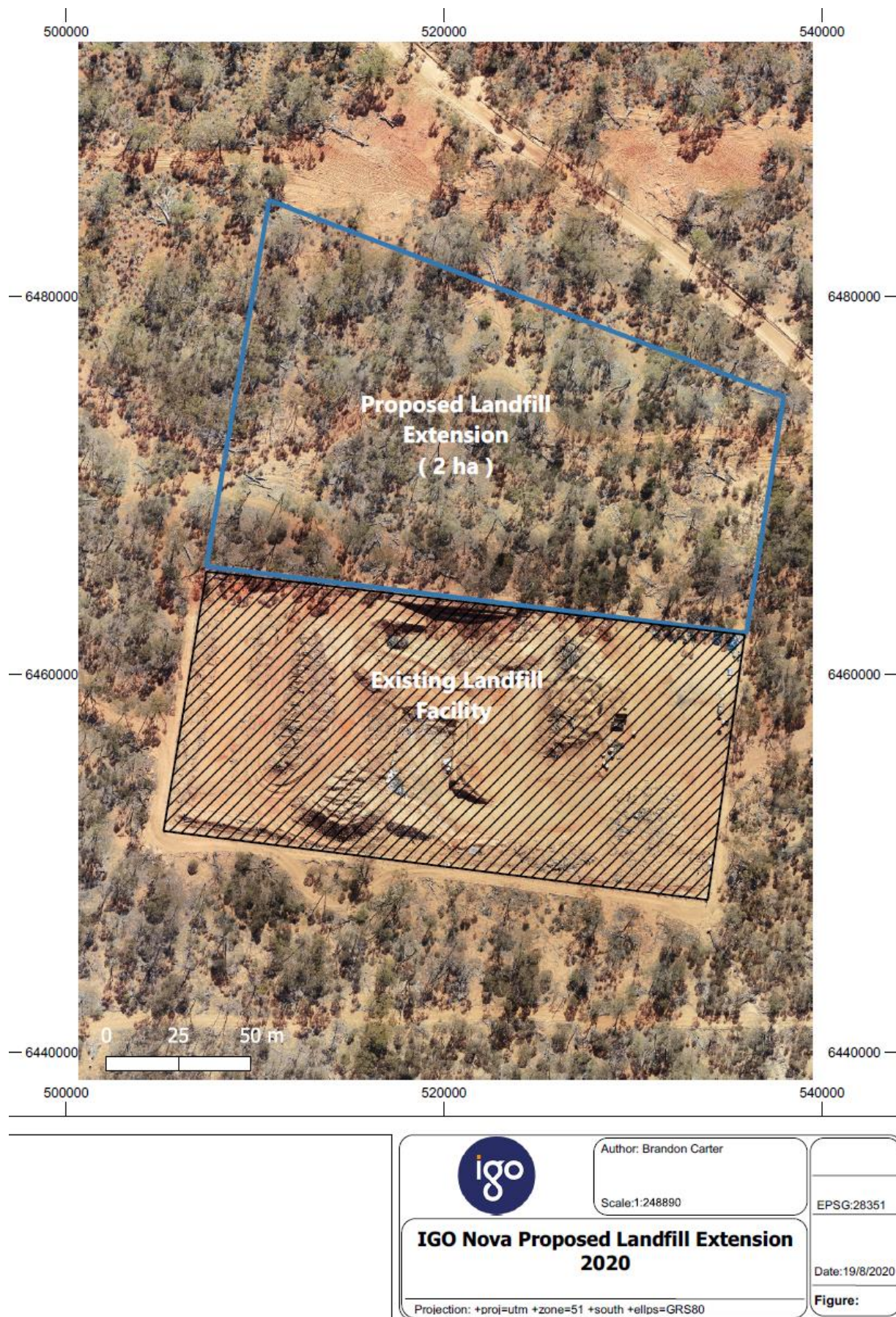
**Figure 2 Location of ephemeral streams with respect to the licensed premise boundary**





**Figure 3 Nova Operations Prescribed Premises Map. Note: Area bounded in red is the Premises (Mining Tenement M28/376).**





**Figure 4 Proposed Nova Operations Landfill Extension**

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) 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.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the Licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L8880/2015/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. landfill activities.

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

**Table 4 Risk assessment of potential emissions and discharges from the Premises during construction, commissioning and operation.**

| Risk Event                                                                                 |                           |                                                                                      |                                                                                                                       |                                               | Risk rating <sup>1</sup><br>C = consequence<br>L = likelihood | Applicant controls sufficient?                                                                                              | Conditions <sup>2</sup> of licence                                                                                                                                                     | Justification for additional regulatory controls                                                                                                             |
|--------------------------------------------------------------------------------------------|---------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities                                                                          | Potential emission        | Potential pathways and impact                                                        | Receptors                                                                                                             | License Holder's controls                     |                                                               |                                                                                                                             |                                                                                                                                                                                        |                                                                                                                                                              |
| Construction                                                                               |                           |                                                                                      |                                                                                                                       |                                               |                                                               |                                                                                                                             |                                                                                                                                                                                        |                                                                                                                                                              |
| Clearing and earthworks for extension of landfill area and construction of boundary fence. | Dust                      | Air/windborne pathway causing impacts to health and amenity                          | Fraser Range Vegetation Complex Priority 1 PEC<br><br>Threatened fauna (Paroplocephalus atriceps – Lake Cronin snake) | No Applicant Controls outlined in submission. | C = Slight<br>L = Possible<br><b>Low Risk</b>                 | Applicant has proposed no controls.<br><br>Risk assessment has shown that controls are not required to further reduce risk. | N/A                                                                                                                                                                                    | N/A                                                                                                                                                          |
|                                                                                            | Noise                     |                                                                                      |                                                                                                                       | No Applicant Controls outlined in submission. | C = Slight<br>L = Unlikely<br><b>Low Risk</b>                 | Applicant has proposed no controls.<br><br>Risk assessment has shown that controls are not required to further reduce risk. | N/A                                                                                                                                                                                    | N/A                                                                                                                                                          |
|                                                                                            | Sediment laden stormwater | Overland runoff potentially causing ecosystem disturbance or impacting surface water | Ephemeral water course                                                                                                | No Applicant Controls outlined in submission. | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>            | No                                                                                                                          | Condition 1.2.5 amended to include sub-conditions (f), (g) and (h).<br><br>(f) drainage diversion bunding at the perimeter of the landfill shall be installed and maintained to ensure | The likelihood of the emission and therefore the risk rating, is reduced by the amendment of the condition.<br><br>Diversions bunding to prevent inflow from |

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| Risk Event                                                                                |                                                  |                                                                                |                                                                                                                                                                       |                                               | Risk rating <sup>1</sup><br><br>C = consequence<br>L = likelihood | Applicant controls sufficient?                                                                                                                | Conditions <sup>2</sup> of licence                                                                                                                                                                                                                     | Justification for additional regulatory controls                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities                                                                         | Potential emission                               | Potential pathways and impact                                                  | Receptors                                                                                                                                                             | License Holder's controls                     |                                                                   |                                                                                                                                               |                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                |
|                                                                                           |                                                  |                                                                                |                                                                                                                                                                       |                                               |                                                                   |                                                                                                                                               | (g) that stormwater is diverted from the landfill;<br>(h) stormwater is diverted from areas of the site where there is waste; water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site | surrounding area into construction area prevents contamination of surface water outside the construction area and potentially contaminated water within the construction site being discharged to the surrounding environment. |
| <b>Commissioning</b>                                                                      |                                                  |                                                                                |                                                                                                                                                                       |                                               |                                                                   |                                                                                                                                               |                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                |
| NA                                                                                        | NA                                               | NA                                                                             | NA                                                                                                                                                                    | NA                                            | NA                                                                | NA                                                                                                                                            | NA                                                                                                                                                                                                                                                     | NA                                                                                                                                                                                                                             |
| <b>Operation</b>                                                                          |                                                  |                                                                                |                                                                                                                                                                       |                                               |                                                                   |                                                                                                                                               |                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                |
| Unloading and storage of material in landfill.<br>Covering landfill.<br>Vehicle movements | Dust                                             | Air/windborne pathway causing impacts to health and amenity                    | Fraser Range Vegetation Complex Priority 1 PEC<br>Southern Hills Vegetation Complex Priority 1 PEC<br>Threatened fauna (Paroplocephalus atriceps – Lake Cronin snake) | No Applicant Controls outlined in submission. | C = Slight<br>L = Unlikely<br><b>Low Risk</b>                     | Applicant has proposed no controls.<br><br>Risk assessment has shown that no additional licence controls are required to further reduce risk. | Condition 1.2.5 contains provision for levelling and compacting of waste prior to covering.<br><br>Condition 1.2.6, Table 1.2.3 provides for covering of waste.                                                                                        | N/A                                                                                                                                                                                                                            |
|                                                                                           | Sediment laden and waste contaminated stormwater | Overland runoff potentially causing ecosystem disturbance or impacting surface | Ephemeral water course                                                                                                                                                | Refer to Section 3.1                          | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>                | No                                                                                                                                            | Condition 1.2.4 and Table 1.2.2 already require the disposal of waste to be within the landfill area and no storage of waste within                                                                                                                    | The likelihood of the emission and therefore the risk rating, is reduced by the amendment of                                                                                                                                   |

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| Risk Event        |                    |                               |           |                           | Risk rating <sup>1</sup><br><br>C = consequence<br>L = likelihood | Applicant controls sufficient? | Conditions <sup>2</sup> of licence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Justification for additional regulatory controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------|--------------------|-------------------------------|-----------|---------------------------|-------------------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities | Potential emission | Potential pathways and impact | Receptors | License Holder's controls |                                                                   |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                   |                    | water quality                 |           |                           |                                                                   |                                | <p>35m of the premises boundary.</p> <p>Condition 1.2.5 amended to include sub-conditions (d) – (h).</p> <p>(d) waste does not get washed, or blown, outside the site;</p> <p>(e) waste that has been washed, or blown, away from the tipping area of the site is returned to the tipping area at least once in each week;</p> <p>(f) drainage diversion bunding at the perimeter of the landfill shall be installed and maintained to ensure that stormwater is diverted from the landfill;</p> <p>(g) stormwater is diverted from areas of the site where there is waste;</p> <p>(h) water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site</p> <p>Condition 1.2.6, Table 1.2.3 is amended to increase the requirement to cover the waste to weekly.</p> | <p>conditions 1.2.5 and 1.2.6.</p> <p>The addition of sub-conditions 1.2.5 (d) – (h):</p> <ul style="list-style-type: none"> <li>• prevents washing of waste from the site and returning of waste to the site in the event that it does become washed from the premises.</li> <li>• Overland flow being diverted around landfill area reduces the potential for clean rainfall runoff coming into contact with waste and uncovered soil. The containment of runoff within the bunded area of the landfill is to prevent discharge of potentially contaminated water to the surrounding environment.</li> </ul> <p>The increased frequency of coverage of waste in Table 1.2.3 reduces the area and volume of waste exposed to the emission pathway.</p> |

| Risk Event                 |                                              |                                                                                                                 |                          |                           | Risk rating <sup>1</sup><br><br>C = consequence<br>L = likelihood | Applicant controls sufficient? | Conditions <sup>2</sup> of licence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Justification for additional regulatory controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------|--------------------------|---------------------------|-------------------------------------------------------------------|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities          | Potential emission                           | Potential pathways and impact                                                                                   | Receptors                | License Holder's controls |                                                                   |                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Putrescible Waste disposal | In situ leachate                             | In situ seepage from the putrescible waste into the supporting landform impacting soil and groundwater quality. | Soil and groundwater     | Refer to Section 3.1      | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>                | Yes                            | Condition 1.2.4, Table 1.2.2 already has the process requirement of: 'The separation distance between the base of the landfill and the highest groundwater level shall not be less than 2 metres.'                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                            | Leachate generated from intercepted rainfall | Overland runoff potentially causing ecosystem disturbance and / or impacting surface water quality              | Ephemeral drainage lines | Refer to Section 3.1      | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>                | No                             | <p>Condition 1.2.5 amended to include sub-conditions (f) – (i).</p> <p>(f) drainage diversion bunding at the perimeter of the landfill shall be installed and maintained to ensure that stormwater is diverted from the landfill;</p> <p>(g) stormwater is diverted from areas of the site where there is waste; water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site</p> <p>(h) water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site; and.</p> <p>(i) The base of the landfill shall be compacted.</p> | <p>The likelihood of the emission and therefore the risk rating, is reduced by the amendment of condition 1.2.5.</p> <p>The addition of sub-conditions 1.2.5 (f) – (i) minimises the amount of stormwater coming in contact with putrescible waste and contaminated water infiltrating the ground by:</p> <ul style="list-style-type: none"> <li>• Overland flow being diverted around landfill area reduces the potential for clean rainfall runoff coming into contact with waste and uncovered soil. The containment of runoff within the bunded area of the landfill is to prevent discharge of potentially contaminated water to the surrounding</li> </ul> |



| Risk Event        |                                  |                                                                                                     |                                           |                           | Risk rating <sup>1</sup><br><br>C = consequence<br>L = likelihood | Applicant controls sufficient? | Conditions <sup>2</sup> of licence                                                                                                                                                                                                                                                                                                                                          | Justification for additional regulatory controls                                                                                                                                                                                                                                                           |
|-------------------|----------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------------|-------------------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities | Potential emission               | Potential pathways and impact                                                                       | Receptors                                 | License Holder's controls |                                                                   |                                |                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                            |
|                   |                                  |                                                                                                     |                                           |                           |                                                                   |                                |                                                                                                                                                                                                                                                                                                                                                                             | <p>environment.</p> <ul style="list-style-type: none"> <li>Stormwater from the landfill premises will be contained within the sump and evaporated to minimise accumulation and infiltration of leachate.</li> <li>Base of the landfill area is to be compacted to minimise seepage of leachate.</li> </ul> |
|                   | Leachate from used tyre disposal | In situ seepage into the supporting landform                                                        | Landform storage cell supporting landform | Refer to Section 3.1      | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>                | Yes                            | Condition 1.2.4, Table 1.2.2 provides for the management of tyres should they be disposed of to the landfill.<br><br>Condition 1.2.3 is amended to provide for weekly covering of waste, this includes tyres.<br><br>Given the sites commitment to sending tyres offsite via the recycling contractor these conditions are a contingency allowing for disposal if required. | NA                                                                                                                                                                                                                                                                                                         |
|                   | In situ waste                    | Fauna directly accessing and scavenging waste impacting health of fauna and encouraging increase of | Fauna                                     | Refer to Section 3.1      | C = Slight<br>L = Almost certain<br><b>Medium Risk</b>            | No                             | Condition 1.2.5 includes requirements for levelling and compacting of waste.<br><br>Condition 1.2.6, Table 1.2.3 requires the coverage of the waste to be carried out and is amended to increase                                                                                                                                                                            | The likelihood of the emission is reduced by blocking a pathway of transmission (direct access by fauna) and therefore the risk rating, is reduced by                                                                                                                                                      |

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| Risk Event        |                                                                                                                                                                        |                                                  |                                                               |                           | Risk rating <sup>1</sup><br><br>C = consequence<br>L = likelihood | Applicant controls sufficient?                                                                                              | Conditions <sup>2</sup> of licence                                                                                                                                                                                                                                                                                                                    | Justification for additional regulatory controls                                                                                                                                                            |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|---------------------------------------------------------------|---------------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Source/Activities | Potential emission                                                                                                                                                     | Potential pathways and impact                    | Receptors                                                     | License Holder's controls |                                                                   |                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                             |
|                   |                                                                                                                                                                        | introduced pest species.                         |                                                               |                           |                                                                   |                                                                                                                             | the frequency of coverage from fortnightly to weekly.<br><br>Condition 1.2.7 requires the securing of the premises with fencing and gates.<br><br>Condition 1.2.7 (c) is amended to define the frequency of inspection of the above security measures more clearly.                                                                                   | the amendment of conditions 1.2.6 and 1.2.7.<br><br>Increased frequency of coverage in Table 1.2.3 and inspections in Condition 1.2.7 (c) minimise the likelihood of fauna using the landfill as a habitat. |
|                   | Odour                                                                                                                                                                  | Air/windborne pathway causing impacts to amenity | No receptors are present as nearest residence ~40km from site | Refer to Section 3.1      | C = Slight<br>L = Unlikely<br><b>Low Risk</b>                     | Applicant has proposed no controls.<br><br>Risk assessment has shown that controls are not required to further reduce risk. | NA                                                                                                                                                                                                                                                                                                                                                    | NA                                                                                                                                                                                                          |
| Used tyre storage | Air emissions (VOCs, polycyclic aromatic hydrocarbons, dioxins, ash, particulate, nitrogen oxides and carbon oxides)<br><br>Oily discharge to surface water (including | Used tyre storage fire                           | Surface water drainages (overland flow, ambient air soil)     | Refer Section 3.1         | C = Moderate<br>L = Unlikely<br><b>Medium Risk</b>                | No                                                                                                                          | Condition 1.2.4, Table 1.2.2 provides for the management of tyres should they be disposed of to the landfill.<br><br>Condition 1.2.3 is amended to provide for weekly covering of waste, this includes tyres.<br><br>Given the sites commitment to sending tyres offsite via the recycling contractor these conditions are a contingency allowing for | NA                                                                                                                                                                                                          |

| Risk Event        |                                |                                     |           |                                 | Risk rating <sup>1</sup><br><br>C =<br>consequence<br>L = likelihood | Applicant<br>controls<br>sufficient? | Conditions <sup>2</sup> of licence | Justification for<br>additional<br>regulatory controls |
|-------------------|--------------------------------|-------------------------------------|-----------|---------------------------------|----------------------------------------------------------------------|--------------------------------------|------------------------------------|--------------------------------------------------------|
| Source/Activities | Potential<br>emission          | Potential<br>pathways and<br>impact | Receptors | License<br>Holder's<br>controls |                                                                      |                                      |                                    |                                                        |
|                   | zinc,<br>cadmium, and<br>lead) |                                     |           |                                 |                                                                      |                                      | disposal if required.              |                                                        |

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

**Table 5: Consultation**

| Consultation method                                                                         | Comments received                                                             | Department response                                  |
|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|------------------------------------------------------|
| Application advertised on the department's website (10/08/2020)                             | None received                                                                 | N/A                                                  |
| Local Government Authority (Shire of Dundas) advised of proposal (7/08/2020)                | None received                                                                 | N/A                                                  |
| Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal (7/08/2020) | DMIRS responded advising of error reference in map depicting area of landfill | Licence Holder corrected error and provided new map. |
| Applicant was provided with draft documents on 4/9/2020                                     | Map in decision report required amendment – provided updated map              | Map updated                                          |

## 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 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Licence as part of the amendment process.

**Table 6: Summary of licence amendments**

| Condition no. | Proposed amendments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.2.5         | <p>Condition 1.2.5 (a) amended to remove the phrase 'as soon as practicable' and include the phrase 'and prior to covering with Type I waste or clean fill'. This makes the condition clearer to follow and increases enforceability of the condition.</p> <p>Inclusion of additional controls to minimise leachate and leachate infiltration through new conditions 1.2.5 (d) – (i) as below:</p> <ul style="list-style-type: none"><li>(d) waste does not get washed, or blown, outside the site;</li><li>(e) waste that has been washed, or blown, away from the tipping area of the site is returned to the tipping area at least once in each week;</li><li>(f) drainage diversion bunding at the perimeter of the landfill shall be installed and maintained to ensure that stormwater is diverted from the landfill;</li><li>(g) stormwater is diverted from areas of the site where there is waste; water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained</li></ul> |



|        |                                                                                                                                                                                                                      |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | <p>on the site</p> <p>(h) water that has come into contact with waste is to be diverted into a sump on the site, or otherwise retained on the site; and.</p> <p>(i) The base of the landfill shall be compacted.</p> |
| 1.2.6  | 'Fortnightly' replaced with 'weekly' in Table 1.2.3 to increase frequency of covering of waste.                                                                                                                      |
| 1.2.7  | 1.2.7 (c) – 'fortnightly' replaced with 'weekly' to increase frequency of security inspections.                                                                                                                      |
| 1.2.11 | Table 1.2.5 amended to include the weekly inspection of landfill facility                                                                                                                                            |

## References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER), 2017, Decision Document L8880/2015/1, File Number DER2015/000284. Amendment date 1 November 2017.
5. JDA Consultant Hydrologists (JDA), 2013. Nova Nickel Project, Fraser Range Surface Water Management 2D Surface Water Modelling. Unpublished report prepared for Sirius Resources.
6. IGO Nova Pty Ltd (Nova) 2020, Tyre management at Nova premises. E-mail received by DWER 18/07/2020.

## Appendix 1: Application validation summary

| SECTION 1: APPLICATION SUMMARY (as updated from validation checklist) |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
|-----------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------|---------------------------------------------------------------------------------------|
| <b>Application type</b>                                               |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| Works approval                                                        | <input type="checkbox"/>            |                                                                                                                                                                                                                |              |      |                                                                                       |
| Licence                                                               | <input type="checkbox"/>            | Relevant works approval number:                                                                                                                                                                                |              | None | <input type="checkbox"/>                                                              |
|                                                                       |                                     | Has the works approval been complied with?                                                                                                                                                                     |              |      | Yes <input type="checkbox"/> No <input type="checkbox"/>                              |
|                                                                       |                                     | Has time limited operations under the works approval demonstrated acceptable operations?                                                                                                                       |              |      | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|                                                                       |                                     | Environmental Compliance Report / Critical Containment Infrastructure Report submitted?                                                                                                                        |              |      | Yes <input type="checkbox"/> No <input type="checkbox"/>                              |
|                                                                       |                                     | Date Report received:                                                                                                                                                                                          |              |      |                                                                                       |
| Renewal                                                               | <input type="checkbox"/>            | Current licence number:                                                                                                                                                                                        |              |      |                                                                                       |
| Amendment to works approval                                           | <input type="checkbox"/>            | Current works approval number:                                                                                                                                                                                 |              |      |                                                                                       |
| Amendment to licence                                                  | <input checked="" type="checkbox"/> | Current licence number:                                                                                                                                                                                        | L8880/2015/1 |      |                                                                                       |
|                                                                       |                                     | Relevant works approval number:                                                                                                                                                                                |              | N/A  | <input checked="" type="checkbox"/>                                                   |
| Registration                                                          | <input type="checkbox"/>            | Current works approval number:                                                                                                                                                                                 |              | None | <input type="checkbox"/>                                                              |
| Date application received                                             |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| <b>Applicant and Premises details</b>                                 |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| Applicant name/s (full legal name/s)                                  |                                     | IGO Nova Pty Ltd                                                                                                                                                                                               |              |      |                                                                                       |
| Premises name                                                         |                                     | Nova Nickel Project                                                                                                                                                                                            |              |      |                                                                                       |
| Premises location                                                     |                                     | M28/376                                                                                                                                                                                                        |              |      |                                                                                       |
| Local Government Authority                                            |                                     | Shire of Dundas                                                                                                                                                                                                |              |      |                                                                                       |
| <b>Application documents</b>                                          |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| HPCM file reference number:                                           |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| Key application documents (additional to application form):           |                                     | Supporting attachments:<br>Attachment 2 – Nova Operations Prescribed Premises Map<br>Attachment 3 – Figure of Proposed Landfill Facility Extension<br>Attachment 8A – Executive Summary to support Application |              |      |                                                                                       |
| <b>Scope of application/assessment</b>                                |                                     |                                                                                                                                                                                                                |              |      |                                                                                       |
| Summary of proposed activities or changes to existing operations.     |                                     | <b>Licence amendment</b><br>Operation of petriscible landfill facility (Class II or III) : Increase capacity of landfill site from 1000 tonnes per annum (tpa) to 2000 tpa.                                    |              |      |                                                                                       |

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          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| Category 5: Processing or beneficiation of metallic ore or non-metallic ore.                                                                                                                     | Assessed production capacity : 1,750,000 tonnes or more per year                                  | Not applicable                                                 |
| 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. | Assessed production capacity : 19.5 MW or more in aggregate (using a fuel other than natural gas) | Not applicable                                                 |
| Category 54: Sewage facility premises                                                                                                                                                            | Assessed production capacity : 192 cubic metres or more per day                                   | Not applicable                                                 |
| Category 64: Class II or III putrescible landfill site                                                                                                                                           | Assessed production capacity : 1,000 tonnes per annual period                                     | Proposed production capacity is 2,000 tonnes per annual period |

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Referral decision No:<br>Managed under Part V <input type="checkbox"/><br>Assessed under Part IV <input type="checkbox"/>                                                                                                            |
| Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?                                         | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Ministerial statement No:<br>EPA Report No:                                                                                                                                                                                          |
| Has the proposal been referred and/or assessed under the EPBC Act?                                                                       | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                              | Reference No:                                                                                                                                                                                                                        |
| Has the applicant demonstrated occupancy (proof of occupier status)?                                                                     | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                              | Certificate of title <input type="checkbox"/><br>General lease <input type="checkbox"/> Expiry:<br>Mining lease / tenement <input checked="" type="checkbox"/> Expiry: 14/08/2035<br>Other evidence <input type="checkbox"/> Expiry: |
| Has the applicant obtained all relevant planning approvals?                                                                              | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | Approval:<br>Expiry date:<br>If N/A explain why?                                                                                                                                                                                     |
| Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?                                  | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                              | CPS No: 6253/2                                                                                                                                                                                                                       |

|                                                                                                                                                                                                            |                                                                     |                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?                                                                                                 | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Application reference No: N/A<br>Licence/permit No: N/A<br>No clearing is proposed.                                                                                                                                                                          |
| Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?                                                                                                | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Application reference No:<br>Licence/permit No: GWL 176816                                                                                                                                                                                                   |
| Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?                                                                                            | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Name: Goldfields Groundwater Area<br>Type: Proclaimed Groundwater Area<br>Has Regulatory Services (Water) been consulted?<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/><br>Regional office: Goldfields |
| Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?                                                                                                                                   | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Name: N/A<br>Priority: P1 / P2 / P3 / N/A<br>Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u> )?<br>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>                  |
| Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i> ) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | <i>Mining Act 1978</i><br><i>Mines Safety and Inspection Act 1994</i><br><i>Mines Safety and Inspection Regulations 1995</i>                                                                                                                                 |
| Is the Premises within an Environmental Protection Policy (EPP) Area?                                                                                                                                      | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |                                                                                                                                                                                                                                                              |
| Is the Premises subject to any EPP requirements?                                                                                                                                                           | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |                                                                                                                                                                                                                                                              |
| Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?                                                                                                      | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |                                                                                                                                                                                                                                                              |