



Application for Licence Amendment

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

Licence Number	L9242/2020/1
Licence Holder	Paddington Gold Pty Limited
ACN	008 585 886
File Number	DER2020/000062
Premises	Golden Cities Legal description – Mining tenements: M24/564, M24/565, M324/616, M27/185 and L24/231 As defined by the coordinates in Schedule 1 of the Revised Licence
Date of Report	3 August 2021
Decision	Revised licence granted

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

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1. Decision summary

Licence L9242/2020/1 is held by Paddington Gold Pty Ltd (Licence Holder) for the Golden Cities mine site (the Premises), located on mining tenements M24/564, M24/565, M324/616, M27/185 and L24/231.

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 L9242/2020/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Application summary

On 18 May 2021, the Licence Holder submitted an application to the department to amend L9242/2020/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The Licence Holder is seeking to add crushing and screening activities to the Existing Licence in order to produce road base and crushed rock suitable for road surfacing at the premises. Crushing and screening is proposed to be undertaken by mobile equipment utilising stockpiled material in the area indicated in Figure 1.

This amendment is limited only to the addition of Category 12 activities (i.e. crushing and screening) to the Existing Licence. No changes to the aspects of the Existing Licence relating to Category 6 have been requested by the Licence Holder.

In amending the Licence, the CEO has also:

- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The department has not undertaken any additional risk assessment of the Premises related to previously authorised activities under the Existing Licence.

Table 1 below outlines the proposed amendments to premises categories.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
6	4,000,000 kL per annual period	4,000,000 kL per annual period	No change.
12	N/A	1,000,000 tonnes per annual period	Addition of new category to authorise crushing and screening of material

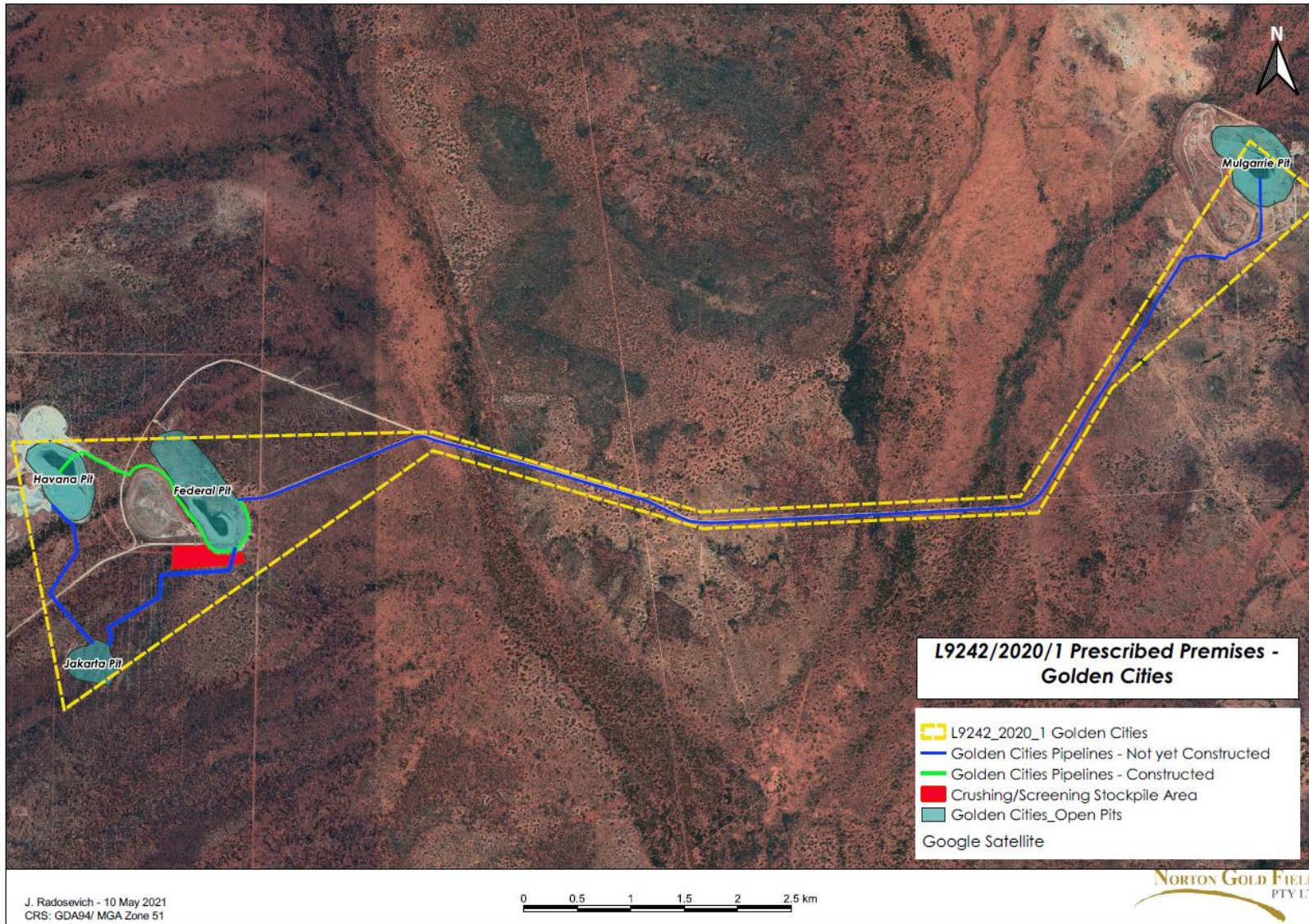


Figure 1: Premises overview – proposed crushing and screening areas

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IR-T15 Amendment report template v3.0 (May 2021)

3. Risk assessment

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

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

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction (being placement of mobile equipment) and operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
<u>Construction</u>			
Dust	Placement of screen and associated equipment including vehicle movements	Air/windborne pathway causing impacts to health and amenity	Trafficable areas will be wet down using a water cart when required. Activities will be limited during high wind periods.
Noise			No controls proposed by Licence Holder.
<u>Operation</u>			
Dust	Screening, crushing, unloading, loading and storage of material including vehicle movements	Air/windborne pathway causing impacts to health and amenity	A water cart will be utilised when required to suppress emissions of fugitive dust. Activities will be limited during high wind periods.
Noise			No controls proposed by Licence Holder.
Sediment laden stormwater	Contact of stormwater with stockpiles of raw materials crushed/screened material	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Stormwater will be collected within existing V drains and spoon drains to limit sediment emissions to the environment.

3.1.2 Receptors

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

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

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

Human receptors	Distance from prescribed activity
Residential premises	The Broad Arrow town site is located approximately 6.6 km south west of the premises – the Delegated Officer considers that this receptor is a sufficient distance from prescribed activities so as to not be impacted by emissions or discharges.
Environmental receptors	Distance from prescribed activity
Threatened/Priority fauna	<p>Five threatened species of fauna and five migratory species of birds were identified as potentially occurring within the project area following a targeted Fauna and Malleefowl Survey carried out in 2017.</p> <p>22 malleefowl mounds were located within the project area, two of which were found to be active. One is located 500m south west of the proposed Jakarta pit. The other, which is classed as ‘recently active’ is located approximately 100m south of the proposed Jakarta pit. Both are outside of the Premises Boundary. Malleefowl are listed as vulnerable under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i>.</p> <p>Targeted malleefowl surveys were undertaken in the Golden Cities Project area in 2017 and 2018. Active mounds are currently undertaken, and activities associated with works are not with 100 m of active or potentially active mounds. A Malleefowl Management Plan and associated reporting and mound marking procedures are in place.</p>
Groundwater	<p>Depth to groundwater varies significantly across the project area, ranging between 14 and 290 mbgl.</p> <p>Total dissolved solids (TDS) range between 27,700 mg/L to 84,200 mg/L and pH ranges from 5.9 – 8.6. The high salinity of the groundwater means it is only utilised for industrial (mining) purposes and has no other beneficial use.</p>

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete 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 L9242/2020/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. crushing/screening 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 (being placement of mobile equipment) and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Construction								
Placement of screen and associated equipment including vehicle movements.	Dust	Air/windborne pathway causing impacts to Malleefowl	Surrounding native vegetation. Threatened/Priority fauna (Malleefowl) located within premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1	The 100 m buffer for Malleefowl mounds is considered industry standard associated with maintaining adequate surrounding vegetation and habitat and minimising indirect impacts (noise, dust and vibrations). The buffer distance is based on approved Malleefowl Management Plans by the EPA, and Ministerial Statements within similar vegetation associations to those at the Premises.
	Noise				C = Minor L = Slight Low Risk	Y	Noise emissions to be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i>	N/A
Operation								
Screening, crushing, unloading, loading and storage/stockpiling of material Vehicle movements	Dust	Air/windborne pathway causing impacts to Malleefowl	Surrounding native vegetation. Threatened/Priority fauna (Malleefowl) located within premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1	The 100 m buffer for Malleefowl mounds is considered industry standard associated with maintaining adequate surrounding vegetation and habitat and minimising indirect impacts (noise, dust and vibrations). The buffer distance is based on approved Malleefowl Management Plans by the EPA, and Ministerial Statements within similar vegetation associations to those at the Premises.

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Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	Noise				C = Minor L = Slight Low Risk	Y	Noise emissions to be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i>	N/A
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance/impacts to native vegetation and potential impact to Malleefowl			C = Minor L = Unlikely Medium Risk	Y	Condition 1	For noting: current conditions within the existing Licence appear adequate to mitigate potential stormwater emissions.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

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
Licence Holder was provided with draft amendment 27 July 2021	Norton requests that the following draft Operational Requirement, with respect to Crushing and Screening Plant: "Crushing and screening must not be undertaken within 100m of any Malleefowl mounds, and" Be replaced with: "Crushing and screening must not be undertaken within 100m of any <u>active</u> Malleefowl mounds, and"	Reference to 'active' Malleefowl mounds has been incorporated into the Licence as requested.

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 Revised Licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
N/A Prescribed premises category description	Inclusion of Category 12 with an assessed production/design capacity of 1,000,000 tonnes per year
Condition 1 Table 1	Inclusion of operational conditions for crushing and screening plant
Condition 7 Table 5	Inclusion of reporting requirement for the quantity of material processed by crushing and screening
N/A Schedule 1	Inclusion of new premises map detailing crushing/screening stockpile area

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)				
Application type				
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L9242/2020/1	
		Relevant works approval number:	W6244/2019/1	N/A <input type="checkbox"/>
Date application received		18 May 2021		
Applicant and Premises details				
Applicant name/s (full legal name/s)		Paddington Gold Pty Ltd		
Premises name		Golden Cities – Suva Sands		
Premises location		L24/231, M24/564, M24/565, M24/616, M27/185 Goldfields Highway 6431		
Local Government Authority		City of Kalgoorlie-Boulder		
Application documents				
HPCM file reference number:		DER2020/000062		
Key application documents (additional to application form):		Attachment 1B Attachment 2 – prescribed premises map Licence amendment application L9242 Golden Cities – Crushing-Screening		
Scope of application/assessment				
Summary of proposed activities or changes to existing operations.		<p><u>Licence amendment</u></p> <p>Addition of Category 12 to the Licence.</p> <p>A mobile crushing and screening plant is proposed to be utilised at the premises to produce rock base and crushed rock suitable for road surfacing and similar activities.</p>		
Category number/s (activities that cause the premises to become prescribed premises)				
Table 1: Prescribed premises categories				
Prescribed premises category and description	Proposed production or design capacity	Proposed changes to the production or design capacity (amendments only)		
Category 12: Screening etc. of material	1,000,000 tonnes per annual period	Addition of new category to the Licence		
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: Managed under Part V <input checked="" type="checkbox"/> 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: 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"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input checked="" type="checkbox"/> Expiry: L24/231 exp. 14/11/2039 M24/564 exp. 3/11/2039 M24/565 exp. 3/11/2039 M24/616 exp. 18/2/2040 M27/185 exp. 17/1/2037 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: Expiry date: Planning approval not required on Mining Tenement
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: 8316/1
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 Licence/permit No: N/A 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"/>	Licence/permit No: GWL151865(12)
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: N/A Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 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 Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i>, <i>Environmental Protection (Controlled Waste) Regulations 2004</i>, <i>State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Mining Act 1978</i></p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: N/A Date of classification: N/A</p>