



## Application for Works Approval Amendment

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

<b>Works Approval Number</b>	W6932/2024/1
<b>Works Approval Holder</b>	Rhodes Ridge Management Services Pty Ltd
<b>ACN</b>	662 895 927
<b>File Number</b>	APP-029433
<b>Premises</b>	Rhodes Ridge  Legal description –  Part of Mining Tenement TR 70/4882  As defined by the Premises maps attached to the Revised Works Approval
<b>Date of Report</b>	8 August 2025
<b>Decision</b>	Revised works approval granted

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A/MANAGER, WASTE INDUSTRIES  
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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## 1. Decision summary

Works Approval W6932/2024/1 is held by Rhodes Ridge Management Services Pty Ltd (Works Approval Holder) for the Rhodes Ridge (the Premises), located in part of Mining Tenement TR 70/4882

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 construction and operation of the Premises. As a result of this assessment, Revised Works Approval W6932/2024/1 has been granted.

The Revised Works Approval issued as a result of this amendment supersedes the existing Works Approval previously granted in relation to the Premises.

## 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 10 June 2025, the Works Approval Holder submitted an application to the department to amend Works Approval W6932/2024/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Increase the prescribed premises boundary
- Amend the discharge criteria for Total Nitrogen (TN) from <30 mg/L to <40 mg/L to align with the designed WWTP output.

The Works Approval Holder has requested to increase TN to <40 mg/L noting that it was an administrative error in the original Works Approval Application Supporting Documentation. The requested increase in TN reflects the manufacturers' specifications and aligns with the expected outputs.

An increase to the prescribed premises boundary was also requested to allow slight flexibility in the configuration of the sprayfield design.

## 3. Risk assessment

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

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

## 3.1 Source-pathways and receptors

### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction, and operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Works Approval Holder has proposed to assist in controlling these emissions, where necessary.

**Table 1: Works Approval Holder controls**

Emission	Sources	Potential pathways	Proposed controls
Discharge of treated wastewater with TN <40 mg/L	Discharge of wastewater to land	Overland runoff, direct discharge and migration via soil to groundwater	<ul style="list-style-type: none"> <li>Sufficient Irrigation area (2.28ha)</li> <li>Regular inspections</li> <li>Regular monitoring of effluent</li> </ul>

### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the Works Approval 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 2** 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 2: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Native Title Determination Area of the Nyiyaparli People	Premises is located within the Nyiyaparli People #3 Native Title Determination Area
Nearest town - Newman	51 km South-east of the Premises Boundary
Pumajina Reserve	52 km Southeast of Premises Boundary
Environmental receptors	Distance from prescribed activity
Pilbara Surface Water Area	Premises is located within the Pilbara Surface Water Area
Underlying groundwater (non-potable purposes)	30 mbgl of prescribed Premises
Threatened and priority Flora: <i>Arista jerichoensis</i> var. <i>subspinulifera</i>	150 m North-northeast of Premises Boundary
Priority 3 Threatened Ecological Communities	6.3 km East of the Prescribed Premises Boundary
Threatened (vulnerable) Fauna	1.7km South southwest of the Prescribed Premises Boundary

## 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 Works Approval 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 Works Approval Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the Works Approval Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3. Risk assessment of potential emissions and discharges from the Premises during commissioning and operation

The Revised Works Approval W6932/2024/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises i.e. construction and operation of supporting infrastructure for a multipurpose camp, including a wastewater treatment plant (WWTP) and irrigation sprayfield. A risk assessment for the operational phase has been included in this Amendment Report, however licence conditions will not be finalised until the department assesses the licence application.

**Table 3. Risk assessment of potential emissions and discharges from the Premises during commissioning and operation**

Risk Event					Risk rating <sup>1</sup>  C = consequence L = likelihood	Works Approval Holder's controls sufficient?	Conditions <sup>2</sup> of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Works Approval Holder's controls				
Commissioning and Operation (including time-limited operations)								
Commissioning and time limited operation of the WWTP and irrigation spray field (including equipment alarms)	Discharge of treated wastewater with increased Total Nitrogen discharge criteria to <40 mg/L	Localised contamination of soils and groundwater causing impacts to ecosystem health and water quality	Soil and underlying groundwater Surrounding vegetation	Refer to Section 3.1 of Works Approval Decision Report	C = Moderate  L = Unlikely  <b>Medium Risk</b>	Y	Conditions 1, 5 and 13-16	No additional regulatory controls added. The Delegated Officer has reviewed the size of the irrigation area and has determined that it is large enough to accommodate the increase in total nitrogen.

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

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

## 4. Consultation

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

**Table 4: Consultation**

Consultation method	Comments received	Department response
Works Approval Holder was provided with draft amendment on 30 July 2025	The works approval holder requested the correction of referencing links throughout the draft works approval and amendment report	Administrative formatting errors corrected throughout works approval.
	Amendments to Tables 1, 3, 5, and 6 to revise the reference to infrastructure or discharge point locations. The Works Approval Holder requests that these references state “within the prescribed premises boundary” instead of “within the infrastructure footprint”	Updated. The wording has been amended to reflect the location of the infrastructure, without reference to the prescribed premises boundary or infrastructure footprint.

## 5. Conclusion

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

### 5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Works Approval as part of the amendment process.

**Table 5: Summary of works approval amendments**

Revised licence condition	Condition summary	Amendment
Condition 1. Table 1 Part 1	Infrastructure and equipment requirements: Wastewater Treatment Plant (WWTP) Design and construction/installation requirements.	Amended discharge criteria for Total Nitrogen from <30 mg/L to <40 mg/L to align with designed WWTP output
Schedule 1 Figure 1	Prescribed Premises boundary map	Revised from current works approval to reflect increased prescribed premises boundary.
Schedule 2	Premises Boundary coordinates table	Revised from current works approval to reflect increased prescribed premises boundary

## 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