



## Application for works approval amendment

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

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<b>Works approval number</b>	W6499/2021/1
<b>Works approval holder</b>	Covalent Lithium Pty Ltd
<b>ACN</b>	70 623 090 139
<b>DWER file number</b>	DER2020/000568
<b>Premises</b>	Covalent Lithium Hydroxide Refinery 15 Mason Road KWINANA WA 6966 Legal description – Lot 15 on Diagram 74883
<b>Date of report</b>	23 February 2022
<b>Status of report</b>	Final

## 1. Decision summary

The delegated officer has determined to make amendments to works approval W6499/2021/1. The amendments are administrative in nature therefore they do not alter the risk profile of the premises, providing those activities, emissions and receptor as stated in existing approvals remain unchanged.

This report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The decision report for the existing works approval will remain on the department's website for future reference and will act as a record of the department's decision making.

## 2. Scope of assessment

### 2.1 Regulatory framework

In amending the works approval, 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

Works approval W6499/2021/1 (W6499) is held by Covalent Lithium Pty Ltd (works approval holder) for its proposed lithium hydroxide refinery on Mason Rd, Kwinana (the premises).

On 17 January 2021, the works approval holder submitted an application to the department to amend the works approval, regarding the construction method specified for monitoring wells on the premises.

The works approval holder seeks to change the drilling method from installing a conductor casing and pressure cementing to prevent cross-contamination between the Safety Bay Sands and Tamala Limestone aquifers, to sonic drilling, on the grounds that sonic drilling allows the outer casing to seal off the aquifer when drilling and reduces the potential for cross-contamination between the upper and lower aquifers.

The works approval holder also seeks an extension to the timeframe specified for installation of the wells by a further 60 days. Covalent expects the wells to be installed in March 2022, which is beyond the existing timeframe specified (180 days after the issue of the original works approval). An additional two months will allow for some redundancy following availability issues with the driller, resulting from COVID-19 delays.

## 3. Decision

The delegated officer notes the drilling method stipulated in condition 7, Table 2 of W6499 has been specified to ensure there is minimal potential for cross-contamination between the aquifers. The delegated officer is satisfied the proposed drilling method also meets this objective.

This application considers the proposed alternate sonic drilling technique only. In considering that there are no changes to the previously assessed production capacity or infrastructure, the delegated officer considers that there are no changes to the existing works approvals risk profile and therefore no risk assessment is required.

The delegated officer also considers a two-month extension to the timeframe for installing the wells to be appropriate, given the circumstances with driller availability.

### 3.1 Consultation

The works approval holder was provided with drafts of the amended works approval and this report on 17 February 2022 and made only minor comments.

## 4. Conclusion

The delegated officer has determined to amend the existing works approval, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 4.1 Summary of amendments

Table 1 provides a summary of the proposed amendments and will act as a record of implemented changes. The proposed changes have been incorporated into the amended works approval as part of the amendment process.

**Table 1: Summary of works approval amendment**

Condition	Proposed amendment
Condition 7 Table 2, Row 1	Timeframe amended to: Must be constructed, developed (purged), and determined to be operational by no later than 240 calendar days of the date of issue of this works approval.
Condition 7 Table 2, Row 2	Well design and construction amended to: The construction technique for the wells must ensure that a good seal is maintained between the Safety Bays Sands Aquifer and clayey aquitard to the Tamala Limestone Aquifer so that no cross-contamination between the upper and lower aquifers occurs.

**Daniel Hartnup**  
**A/MANAGER, PROCESS INDUSTRIES**  
**REGULATORY SERVICES**

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