Licence number L8780/2013/1

Licence holder APT Parmelia Pty Ltd

**ACN** 078 902 397

Registered business address Level 19 HSBC Building

580 St George Street SYDNEY NSW 2000

**DWER file number** 2013/003894

**Duration** 27/01/2014 to 26/01/2030

 Date of issue
 23/01/2014

 Date of amendment
 29/07/2024

Premises details Mondarra Gas Storage Facility

Part of Lot 356 and Lot 123 on Deposited Plan

2993

**MILO WA 6525** 

As defined by the coordinates in Schedule 1

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i> )	Assessed production capacity
Category 10: Oil or gas production from wells: premises whether on land or offshore, on which crude oil, natural gas or condensate is extracted from below the surface of the land or the seabed, as the case requires, and is treated or separated to produce stabilized crude oil, purified natural gas or liquefied hydrocarbon gases.	2,000,000 tonnes per annum

This revised licence is granted to the licence holder, subject to the attached conditions, on 29 July 2024, by:

#### **MANAGER PROCESS INDUSTRIES**

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

# **Licence history**

Date	Reference number	Summary of changes
23/01/2014	L8780/2013/1	New licence application for the facility.
02/06/2022	L8780/2013/1	Amendment application to allow acceptance, storage and transfer of minor quantities of controlled wastes.
29/07/2024	L8780/2013/1	Amendment to specify compliance with the 1995 version of Australian Standard AS 4323.1.

# Interpretation

#### In this licence:

- (a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a condition, each row in a table constitutes a separate condition;
- (d) any reference to an Australian or other standard, guideline, or code of practice in this licence:
  - (i) if dated, refers to that particular version; and
  - (ii) if not dated, refers to the latest version and therefore may be subject to change over time;
- (e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and
- (f) unless specified otherwise, all definitions are in accordance with the EP Act.

**NOTE:** This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

### Licence conditions

The licence holder must ensure that the following conditions are complied with:

#### General

- **1.** The licence holder must only accept onto the premises waste of a type that:
  - (a) does not exceed the rate at which that waste is received; and
  - (b) meets the relevant acceptance specification,

as set out in Table 1.

Table 1: Types of waste authorised to be accepted onto the premise

Waste type	Rate at which waste is received	Acceptance specification
Waste oil and water mixtures or emulsions, and	1,500 litres per annual period	Received in bunded pallets and enclosed containers only.
hydrocarbon and water mixtures or emulsions		To be stored within the Hazardous Materials Bund shown in the Figure 2
Non-halogenated organic	450 litres per annual	(Schedule 1: Maps).
chemicals	period	Storage and consolidation only.
Used lead acid batteries	10 batteries per annual period	Consolidation of liquid waste to occur within the bunded area.
Use oil filters	300kg per annual period	Used oil filters containing free liquids stored within leak-proof container on concrete hardstand.

- 2. Where waste does not meet the waste acceptance criteria set out in condition 1, the licence holder must:
  - (a) reject the waste; and
  - (b) record the details of the:
    - (i) waste (type and description);
    - (ii) source of the waste load;
    - (iii) name of the waste carrier;
    - (iv) registration number of the delivery vehicle; and
    - (v) date that the waste load was rejected; and
  - (c) maintain accurate and auditable records of all waste loads rejected from the premises.
- 3. The licence holder must ensure that where waste does not meet the waste acceptance criteria set out in condition 1, it is removed from the premises by the delivery vehicle or, where that is not possible, stored in a quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable.

### Infrastructure and equipment

4. The licence holder must ensure that the site infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 2.

Table 2: Infrastructure and equipment requirements

Site infrastructure and equipment	Operational requirement	Infrastructur e location
Evaporation Pond	All treated produced formation water, brine, treated hydrocarbon contaminated water, process water and potentially contaminated water generated on the premises is to be discharged to the Evaporation Pond.  Dual skin HDPE liners with monitoring facilities to monitor for leakage of primary layer.  A minimum top of embankment freeboard of 500mm is to be	Figure 2 (Schedule 1: Maps)
	maintained to allow for a 1 in 100 year/72 hour storm event	
Hazardous materials bund	A concrete bunded containment area which is capable of storing 110% of the volume of the largest storage container, or 25% of the total storage volume if multiple containers that occur within the bund.	Figure 2 (Schedule 1: Maps)

## **Emissions and discharges**

#### **Air emissions**

**5.** The licence holder must ensure that the emissions specified in Table 3, are discharged only from the corresponding discharge point and only at the corresponding discharge point location.

**Table 3: Authorised discharge points** 

Emission	Discharge point	Discharge point height (m AGL)	Discharge point location as shown in Schedule 1: Map – Figure 2
NOx	Gas Engine Alternators (GEA) 1 Exhaust	4.6	1
SOx	GEA 2 Exhaust	4.6	2
CO VOCs	GEA 3 Exhaust	4.6	3
PM	Compressor 1 Exhaust	8.2	4
	Compressor 2 Exhaust	8.2	5
	Low Pressure (LP) Flare	9.1	6
	High Pressure (HP) Flare	42	7
	Regeneration Gas Heater	9.7	8

#### Air emissions - Specified actions

**6.** The licence holder shall take the relevant specified management action in the case of an event in Table 4.

**Table 4: Management actions** 

Emission point	Event reference	Event	Management action
1 – 8	EA1	Start up, shut down, upset or emergency conditions	The Licence Holder shall take all practical measures to minimise emissions

#### **Monitoring**

#### **General**

- 7. The licence holder must ensure that monitoring is undertaken in each annual period such that there are at least 9 months in between the days on which samples are taken in successive years.
- **8.** The licence holder must record the results of all monitoring activity required by conditions 9, 13, 13 and 14.

#### Air emissions monitoring

**9.** The licence holder must monitor emissions in accordance with the requirements specified in Table 5 and record the results of all such monitoring.

Table 5: Air emissions monitoring

Discharge point	Parameter	Frequency <sup>1</sup>	Averaging period	Unit <sup>2, 3</sup>	Method
1 – 5, 8	SO <sub>2</sub>	Annually	30 minute average	mg/m ³g/s	USEPA Method 6 or 6C
1 –5, 8	NO <sub>x</sub>	Annually	30 minute average	mg/m³ g/s	USEPA Method 7E or 7D
1 – 5, 8	TOC as methane	Annually	30 minute average	mg/m³ g/s	USEPA Method 25A
1 – 5, 8	СО	Annually	30 minute average	mg/m³ g/s	USEPA Method 10
6	Purge and Flared Gas volumetric	Continuous	24 hours	m³/s	Low flow rates: VDI/VDE Code 3513
	flow rate				High flow rates: AGA Report 9
7	Purge and Flared Gas volumetric	Continuous	24 hours	m³/s	Low flow rates: VDI/VDE Code 3513
	flow rate				High flow rates: Vendor Proprietary Design

- Note 1: Monitoring shall be undertaken to reflect normal operating conditions and any limits or conditions on inputs or production.
- Note 2: All units are referenced to STP dry
- Note 3: For emission point 1 5 and 8, units shall be referenced to 15% O<sub>2</sub>
- **10.** The licence holder must ensure that sampling required by condition 9 is undertaken at sampling locations in accordance with AS 4323.1:1995.
- 11. The licence holder must ensure that all non-continuous sampling and analysis undertaken pursuant to condition 9 is undertaken by a holder of a current accreditation from the National Association of Testing Authorities (NATA) for the methods of sampling and analysis relevant to the corresponding relevant parameter.

#### **Wastewater monitoring**

- **12.** The licence holder must monitor wastewater for concentrations of the parameter listed in Table 11Table 6:
  - (a) at the corresponding monitoring location;

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- (b) in the corresponding unit;
- (c) at no less that the corresponding frequency;
- (d) for the corresponding averaging period; and
- (e) using the corresponding method,

as set out in Table 11 (Schedule 2).

#### **Groundwater monitoring**

- **13.** The licence holder must monitor the groundwater for concentrations of the parameter listed in Table 6:
  - (a) at the corresponding monitoring location;
  - (b) in the corresponding unit;
  - (c) at no less that the corresponding frequency;
  - (d) for the corresponding averaging period; and
  - (e) using the corresponding method,

as set out in Table 6.

**Table 6: Monitoring of ambient concentrations** 

Parameter	Monitoring	Linit Francosci A	Averaging	Method			
Parameter	location	Unit	Frequency	period	Sampling	Analysis	
Standing water level		m					
рН		-				In situ	
Electrical conductivity		μS/cm					
Arsenic	APA bore	mg/L					
Cadmium	Farmers	mg/L					
Chromium	bore1	mg/L			AS/NZS		
Copper	North	mg/L			5667.1		
Lead	monitoring bore	mg/L	Annually	Spot sample			
Mercury	South	mg/L			AS/NZS 5667.11	NATA	
Fluoride	Monitoring	mg/L					
Inorganic nitrogen	Dore	bore m	mg/L	]			
Phosphorus		mg/L					
Total recoverable hydrocarbons		mg/L					
Benzene		mg/L					

#### Waste input monitoring

14. The licence holder must record the total amount of waste accepted onto the premises, for each waste type listed in Table 7, in the corresponding unit, and for each corresponding time period, as set out in Table 7.

Table 7: Waste accepted to the premises

Waste type	Unit	Time period
Waste oil and water mixtures or emulsions, and hydrocarbon and water mixtures or emulsions	Litres	
Non-halogenated organic chemicals		Each load accepted at
Used lead acid batteries	Number of batteries	the premises
Use oil filters	Kilograms	

#### **Records and reporting**

- **15.** During any non-standard flaring event, the licensee shall record the following information:
  - (a) information as to why the flaring was required;
  - (b) the date, time and duration of flaring;
  - (c) type of gas/product flared;
  - (d) estimated volume of gas/product flared; and
  - (e) emissions of dark smoke during flaring.
- 16. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions from the premises:
  - (a) the name and contact details of the complainant, (if provided);
  - (b) the time and date of the complaint;
  - (c) the complete details of the complaint and any other concerns or other issues raised; and
  - (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.
- **17.** The licence holder must:
  - (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
  - (b) prepare and submit to the CEO by no later than 28 days after the end of that annual period an Annual Audit Compliance Report in the approved form.
- **18.** The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:
  - (a) the calculation of fees payable in respect of this licence;
  - (b) any maintenance of infrastructure that is performed in the course of complying with condition 4 of this licence:
  - (c) monitoring programmes undertaken in accordance with conditions 9, 12, 13 and 14 of this licence;
  - (d) complaints received under condition 15 of this licence; and
  - (e) details of flaring events under condition 15.

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- **19.** The books specified under condition 18 must:
  - (a) be legible;
  - (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
  - (c) be retained by the licence holder for the duration of the licence; and
  - (d) be available to be produced to an inspector or the CEO as required.
- **20.** The licence holder must submit to the CEO by no later than 28 days after the end of each annual period, an Annual Environmental Report for that annual period for the conditions listed in Table 8, and which provides information in accordance with the corresponding requirement set out in Table 8.

**Table 8: Annual Environmental Report** 

Condition	Requirement
6 – Specified actions	A tabulated summary of events and investigations and actions taken in response to the events.
9 – Air emissions monitoring	Tabulated monitoring data results and time-series graphs in Microsoft Excel format for each monitoring location showing concentrations of all
12 – Wastewater monitoring	parameters over a minimum three year period (where sufficient data allows).
13 – Groundwater	An interpretation of the monitoring data including comparison to historical trends.
monitoring	Copies of original monitoring, laboratory and analysis reports submitted by third parties.
14 – Waste input monitoring	A tabulated summary of waste received at the premises
15 – Complaints	A tabulated summary of complaints and investigations and actions taken in response to the events.
15 – Flaring events	A tabulated summary of flaring events and investigations and actions taken in response to the events.

**21.** The Licensee shall ensure that the parameters listed in Table 9 are notified to the Director in accordance with the notification requirements of the table.

**Table 9: Notification requirements** 

Condition reference	Parameter	Notification requirement
4	Breach of primary HDPE liner	As soon as practicable but no later than 5pm of the next usual working day.
6	Any non-standard flaring event	

# **Definitions**

In this licence, the terms in Table 10 have the meanings defined.

**Table 10: Definitions** 

Term	Definition
ACN	Australian Company Number
AHD	Australian height datum
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates may be available on the Department's website).
Annual period	a 12 month period commencing from1 April until 31 March of the immediately following year.
AS 4323.1:1995	means the Australian Standard AS4323.1:1995 Stationary Source Emissions Method 1: Selection of sampling positions
AS/NZS 5667.1	means the Australian Standard AS/NZS 5667.1 Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples
AS/NZS 5667.10	means the Australian Standard AS/NZS 5667.10 Water Quality – Water quality – Sampling – Guidance on sampling of waste waters
AS/NZS 5667.11	means the Australian Standard AS/NZS 5667.11 Water Quality – Sampling – Guidance on sampling of groundwaters
averaging period	means the time over which a limit or target is measured or a monitoring result is obtained
СО	Carbon Monoxide
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer of the Department. "submit to / notify the CEO" (or similar), means either:
	Director General Department administering the Environmental Protection Act 1986 Locked Bag 10 Joondalup DC WA 6919
	or: info@dwer.wa.gov.au
Controlled Waste Regulations	Environmental Protection (Controlled Waste) Regulations 2004 (WA).
Delivery vehicle	means the vehicle in which the waste material was delivered.

Term	Definition				
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.				
Discharge	has the same meaning given to that term under the EP Act.				
Emission	has the same meaning given to that term under the EP Act.				
EP Act	Environmental Protection Act 1986 (WA)				
EP Regulations	Environmental Protection Regulations 1987 (WA)				
freeboard	means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point				
g/s	grams per second				
HDPE	means high density polyethylene				
licence	refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.				
licence holder	refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.				
m AGL	means metres above ground level				
mg/L	milligram per litre				
mg/m³	milligrams per cubic metre				
m³/s	cubic metres per second				
NATA	means the National Association of Testing Authorities, Australia				
NATA Accredited	means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis				
Non-standard flaring event	means any event where a plant blowdown is initiated to safely depressure plant and equipment in the event of an emergency				
NO <sub>x</sub>	means oxides of nitrogen, defined as the sum of nitric oxide and nitrogen dioxide and expressed as nitrogen dioxide				
Normal operating conditions	means any operation of a particular process (including abatement equipment) excluding start-up, shut-down and upset conditions, in relation to stack sampling or monitoring				
PM	means particulate matter				
	•				

Term	Definition					
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map Figure 1 in Schedule 1 to this licence.					
prescribed premises	has the same meaning given to that term under the EP Act.					
shut-down	means the period when plant or equipment is brought from normal operating conditions to inactivity					
spot sample	means a discrete sample representative at the time and place at which the sample is taken					
stack test	means a discrete set of samples taken over a representative period a normal operating conditions					
start-up	means the period when plant or equipment is brought from inactivity to normal operating conditions					
STP dry	means standard temperature and pressure (15°Celsius and 101.325 kilopascals respectively), dry					
SO <sub>2</sub>	Sulphur Dioxide					
TOC	means total organic compounds					
μS/cm	micro Siemens per centimetre					
USEPA	means United States (of America) Environmental Protection Agency					
USEPA Method 6	means the promulgated Test Method 6 – Determination of Sulfur Dioxide Emissions from Stationary Sources					
USEPA Method 6C	means the promulgated Test Method 6C – Determination of Sulfur Dioxide Emissions from Stationary Sources (Instrumental Analyzer Procedure)					
USEPA Method 7D	means the promulgated Test Method 7D - Determination of Nitrogen Oxide Emissions from Stationary Sources (Alkaline-Permanganate/Ion Chromatographic Method)					
USEPA Method 7E	means the promulgated Test Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure)					
USEPA Method 10	means the promulgated Test Method 10 – Determination of Carbon Monoxide Emissions from Stationary Sources (Instrumental Analyzer Procedure)					
USEPA Method 25A	means the promulgated Test Method 25A – Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer					

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Term	Definition
VOC	means volatile organic compound
waste	has the same meaning given to that term under the EP Act.
waste type	means waste types identified in the Controlled Waste Regulations

### **END OF CONDITIONS**

# **Schedule 1: Maps**

# **Premises map**

The boundary of the prescribed premises is shown in the map below (Figure 1).

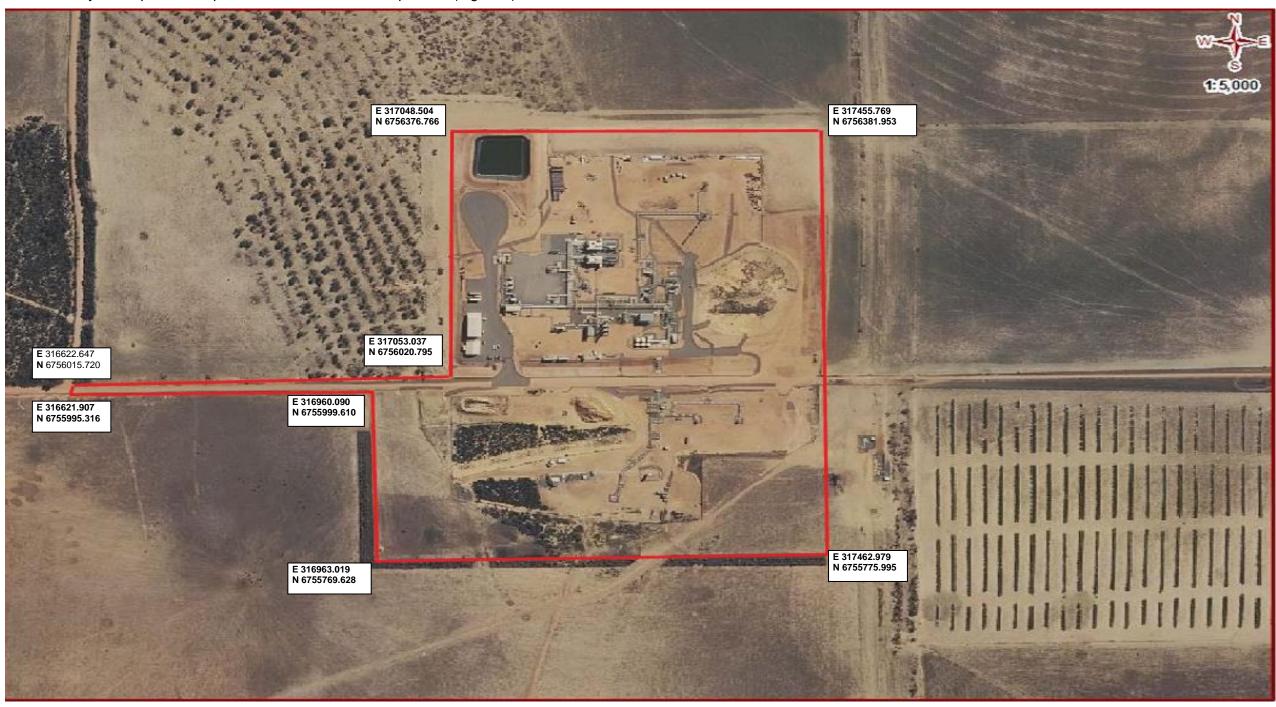


Figure 1: Map of the boundary of the prescribed premises

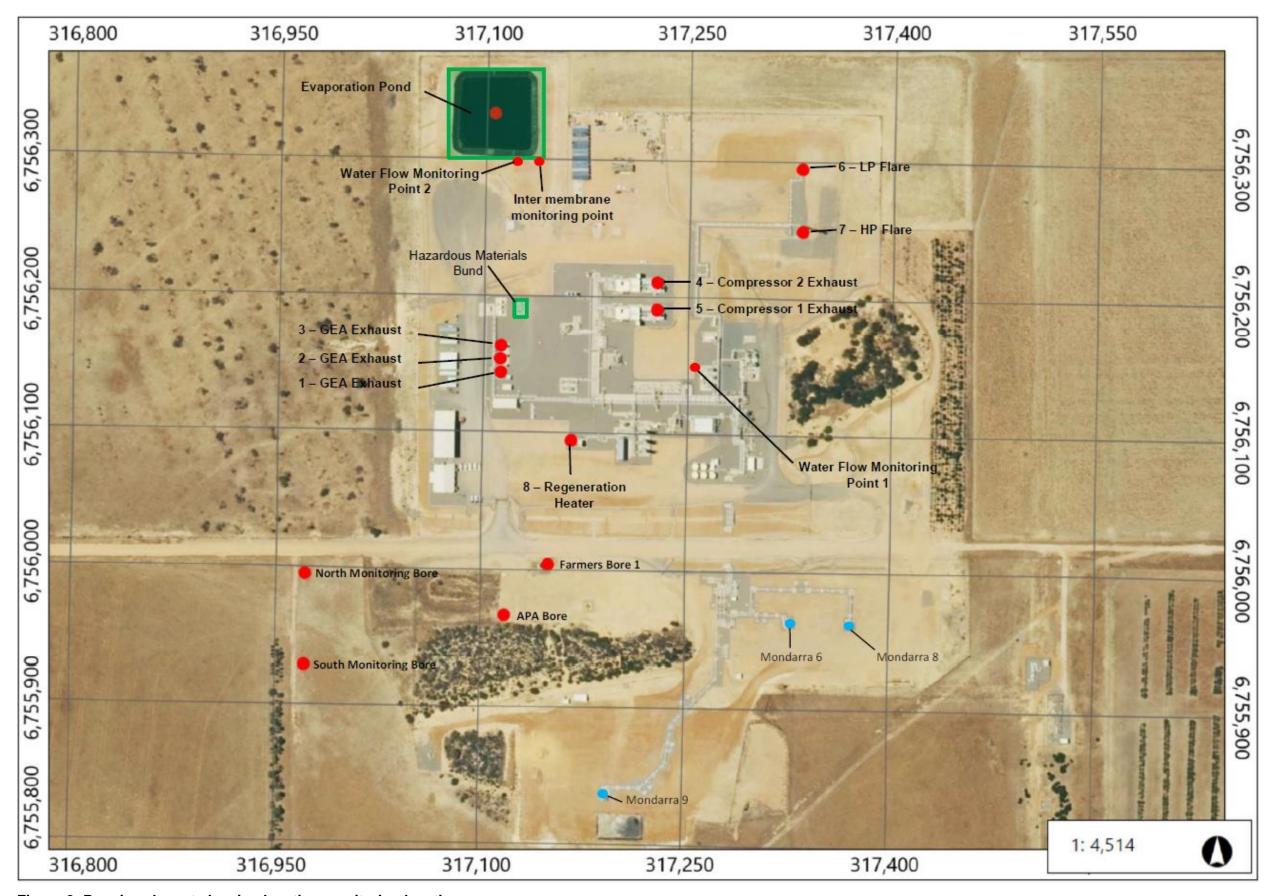


Figure 2: Premises layout showing location monitoring locations

# **Schedule 2: Monitoring requirements**

**Table 11: Monitoring of wastewater** 

Parameter	Monitoring location	l Init	Eroguana	Averaging period	Method	
		Unit	Frequency		Sampling	Analysis
Volume of formation water discharged to evaporation pond	Water Flow Monitoring Point 1	m³	Monthly (report annually)	Cumulative	None specified	Non specified
Volume of other water discharged to evaporation pond	Water Flow Monitoring Point 2	m <sup>3</sup>				
pН		-			AS/NZS 5667.1 AS/NZS 5667.10	In situ
Electrical conductivity		μS/cm				NATA
Arsenic		mg/L				
Cadmium		mg/L				
Chromium		mg/L				
Copper		mg/L	Annually	Spot sample		
Lead		mg/L				
Mercury	Evaporation Pond	mg/L				
Fluoride	1 Onu	mg/L				
Phosphorus		mg/L				
Total recoverable hydrocarbons		mg/L				
Benzene		mg/L				
Ammonia		mg/L				
Inorganic nitrogen		mg/L				
Potassium		mg/L				
Sodium		mg/L				
рН	Inter membrane monitoring point	-			AS/NZS 5667.1 AS/NZS 5667.10	In situ
Total recoverable hydrocarbons		mg/L		Spot sample		
Ammonia		mg/L	Annually			
Inorganic nitrogen		mg/L				NATA
Potassium		mg/L				
Sodium		mg/L				