



Works Approval Number	W6029/2017/1	
Works Approval Holder	Griffin Coal Mining Company Pty Ltd	
Works Approval Holder ACN Number	008 667 285	
Registered business address	Level 1, 677 Murray Street WEST PERTH WA 6005	
Address for notifications	Locked Bag 218 COLLIE WA 6225	
Duration	Commencement date	Expiry Date
	11 April 2017	10 April 2027
Prescribed Premises	Category 63: Class I inert landfill site	
Premises	Coal Mining Lease 12/459 Part of State Forest 24 Reserve	

This Works Approval is granted to the Works Approval Holder, subject to the following conditions, on 10 April 2017 by:

Tim Gentle

Manager Licensing (Resource Industries)

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

Premises Description

The Works Approval Holder proposes to establish and operate a class I inert landfill in the locality of Cardiff in the Shire of Collie, approximately 15 km south-east of the Town of Collie.

The proposed facility will include activities which fall within Category 63, and as such the Premises is deemed a Prescribed Premises under the EP Act.

Conditions

Environmental compliance

1. The **Works Approval Holder** must comply with the **EP Act** and all regulations prescribed under the **EP Act** applicable to the **Premises** including:
 - (a) The duties of an occupier under s 61;
 - (b) The duty to notify the **CEO** of **discharges** of waste under s 72; and
 - (c) Not causing, or doing anything that is likely to cause, an offence under the **EP Act**,

except where the **Works Approval Holder** does something in accordance with a **Condition** which expressly states that a defence under s 74A of the **EP Act** may be available.

Premises

2. The **Works Approval Holder** must carry out the Works within the **Premises** in accordance with the requirements set out in Schedule 2.
3. This **Works Approval** applies to the **Premises** defined in the *Premises Description Table* and as depicted in the Premises Map in Schedule 1.

Premises Description Table	
General Location	Legal land description, reserve or tenement (all or part)
CML 12/459	Coal mining lease under the <i>Collie Coal (Griffin) Agreement Act 1979</i>

Location of Works

4. The **Works Approval Holder** must locate the Works generally in accordance with the Site Plan in Schedule 3.

Infrastructure and Equipment

5. Key items of infrastructure which are required to be built are listed in the *Infrastructure Requirements Table*. The **Works Approval Holder** must not depart from the requirements specified in column 2 of the *Infrastructure Requirements Table* except:
 - (a) where such departure is minor in nature and does not materially change or affect the infrastructure; or
 - (b) where such departure improves the functionality of the infrastructure and does not increase risks to public health, public amenity or the environment;and all other **Conditions** in this Works Approval are still satisfied.

Infrastructure Requirements Table	
Infrastructure	Requirements (Design and Construction)
Engineered trenches	Trench depth – no more than 4 m Trench width – 4-6 m Trench length – 75 m Space between trenches – 2-6 m
Stormwater-diverting bunds surrounding trenches	Designed to ensure surface water is directed away from the engineered trenches.

6. On completion of the Works, the **Works Approval Holder** must provide to the **CEO** a compliance document confirming the construction of the first trench only in accordance with the works approval.
7. If any departures to the specified Works have occurred, the **Works Approval Holder** must provide the **CEO** with a list of departures which are certified as complying with Condition 5 at the same time, and from the same engineer, as the certification under Condition 6.

Records and Information

8. The **Works Approval Holder** must maintain accurate records including information, reports and data in relation to the Works.
9. All information and records required under this **Works Approval** must:
 - (a) be legible;
 - (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval; and
 - (c) be retained for 6 years after the expiry of this **Works Approval**.

Reports

10. If requested by the **CEO** from time to time, the **Works Approval Holder** must provide the **CEO** with reports or information relating to the Works, the **Premises** or any **condition** in this Works Approval (including data from any monitoring conditions or environmental risk assessment studies).
11. Reports or information must be in such form as the **CEO** may require in a **CEO Request**.

Requests for Information

12. The **Works Approval Holder** must comply with a **CEO Request**, within 7 days from the date of the **CEO Request** or such other period specified in the **CEO Request**.

Definitions and Interpretation

Definitions

In this Works Approval, the following terms have the following meanings:

CEO Request means a request made by the CEO to the Works Approval Holder in writing, sent to the Works Approval Holder's address for notifications, as described at the front of this Works Approval, in relation to:

- (a) information, records or reports in relation to specific matters in connection with this Works Approval including in relation to compliance with any conditions and the calculation of fees (whether or not a breach of condition or the EP Act is suspected); or
- (b) reporting, records or administrative matters:
 - (i) which apply to all Works Approvals granted under the EP Act; or
 - (ii) which apply to specified categories of Works Approvals within which this Works Approval falls.

Condition means a condition to which this Works Approval is subject under s 62 of the EP Act.

Discharge has the same meaning given to that term under the EP Act and, in relation to waste or other matter, includes deposit it or allow it to escape, or cause or permit it to be, or fail to prevent it from being, discharged, deposited or allowed to escape.

EP Act means the *Environmental Protection Act 1986* (WA).

EP Regulations means the *Environmental Protection Regulations 1987* (WA).

Premises refers to the premises to which this Works Approval applies, as specified at the front of this Works Approval and as shown on the map in Schedule 1 to this Works Approval.

Works Approval refers to this document, which evidences the grant of Works Approval by the CEO under s 57 of the EP Act, subject to the conditions.

Works Approval Holder refers to the occupier of the Premises being the person to whom this Works Approval has been granted, as specified at the front of this Works Approval.

Interpretation

In this Works Approval:

- (a) the words 'including,' 'includes' and 'include' will be read as if followed by the words 'without limitation';
- (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; and
- (d) any reference to an Australian or other standard, guideline or code of practice in this Works Approval means the version of the standard, guideline or code of practice in force at the time of granting of this Works Approval and includes any amendments to the standard, guideline or code of practice which may occur from time to time during the course of the Works Approval.

Works Approval document history

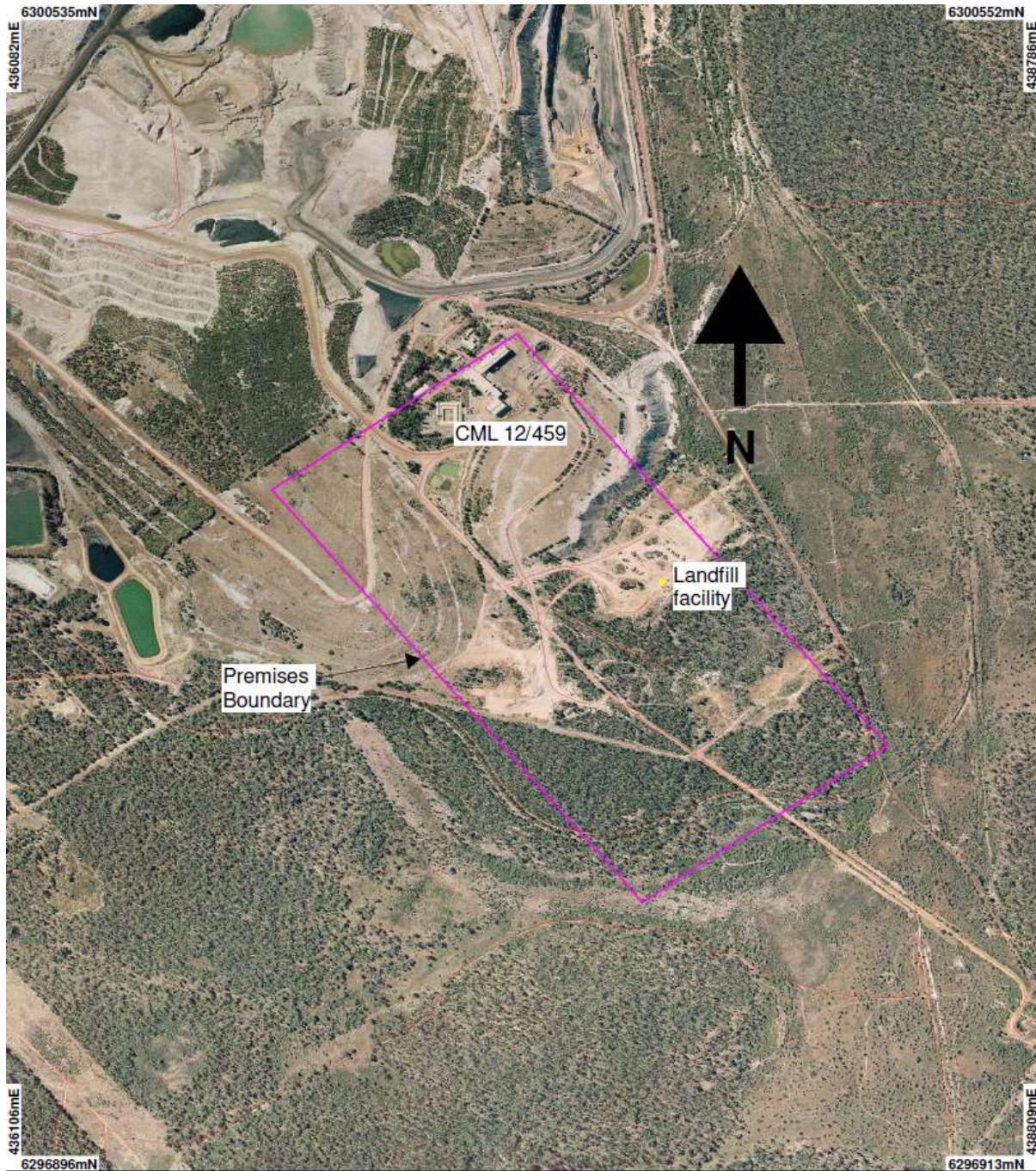
Where this Works Approval has been amended, and revised Works Approvals have been issued, the document history is set out below.

Amendment Description	Date	Revision No
First issue	10/04/2017	1

Schedule 1: Maps

Premises Map

The **Premises** is shown in the map below. The pink line depicts the boundary to the **Premises**.

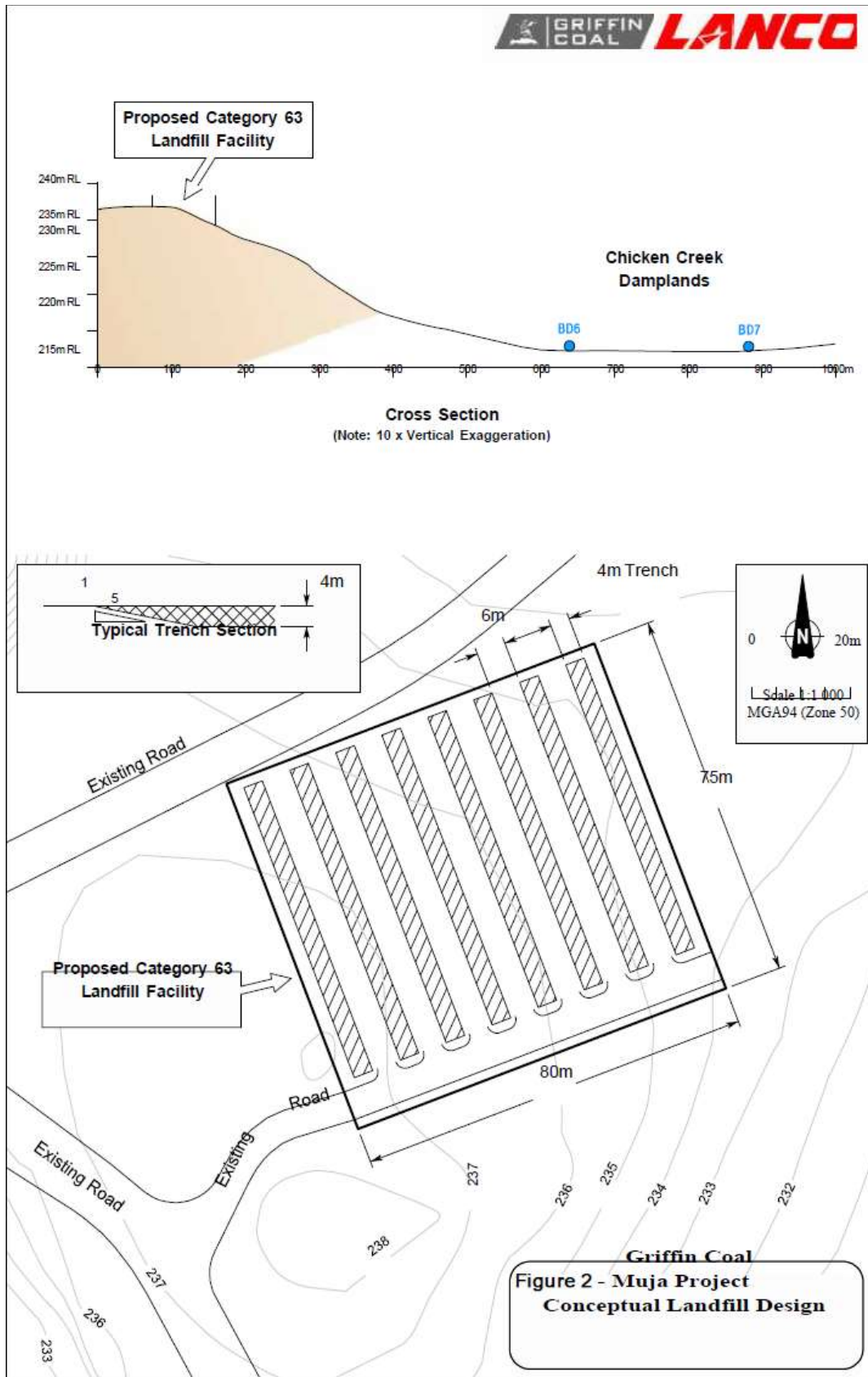


Schedule 2: Works

The Works to be carried out on the Premises are specified in the table below:

Item	Works	Specifications/Drawings
1	Individual trenches to be no more than four meters in depth, four-six meters in width and spaced two-six meters apart, positioned as indicated on the Site Plan. The floor of each trench shall be at least 3 meters above the high groundwater mark.	Site Plan
2	Spoil from the excavation of trenches to be used to construct bunding that surrounds the open trenches to ensure stormwater is diverted away from open trenches.	

Schedule 3: Site Plan





Concurrent application for Works Approval and Licence

Division 3, Part V *Environmental Protection Act 1986*

Applicant: Griffin Coal Mining Company Pty Ltd

ACN: 008 667 285

Instrument Type W6029/2017/1

File Number: DER2016/002473

Premises: Muja Landfill

CML 12/459

Part of State Forest 24 Reserve

Date of report: 10/04/2017

Status of Report Final

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Attachment 1: Issued Works Approval W6029/2017/1

Definitions of terms and acronyms

Term	Definition
CR	Compliance Report
AER	Annual Environment Report
Category/Categories (Cat.)	categories of prescribed premises as set out in Schedule 1 of the EP Regulations
CS Act	<i>Contaminated Sites Act 2003 (WA)</i>
DER	Department of Environment Regulation
Decision Report	this document
Delegated Officer	An officer under section 20 of the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Licence Holder	Griffin Coal Mining Company Pty Ltd
m ³	cubic metres
Minister	the Minister responsible for the EP Act and associated regulations
MS	Ministerial Statement
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	is defined in the EP Act to mean a person who is in occupation or control of a premises, or part of a premises, whether or not that person is the owner of the premises or part of the premises.
Premises	CML 12/459; Part of State Forest 24 Reserve
Prescribed Premises	Premises prescribed under Schedule 1 to the EP Regulations
Primary Activities	is defined in DER's <i>Guidance Statement: Risk Assessments</i> to include the primary activities which fall within the description of the category of prescribed premises in Schedule 1 to the EP Regulations.
prescribed premises	premises prescribed under Schedule 1 to the EP Regulations.
UDR	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i>
µg/m ³	micrograms per cubic metre
µg/L	micrograms per litre

1. Purpose and scope of assessment

Griffin Coal Mining Company Pty Ltd (the Applicant) has applied to construct a category 63 inert landfill within an area historically disturbed by coal mining. The site is located in the locality of Cardiff in the Shire of Collie, approximately 15 km south-east of the Town of Collie

This **Decision Report** sets out **DER's** assessment and decision making in relation to an application for works approval and licence under Division 3, Part V of the **EP Act** for the proposal.

The scope of assessment for this Decision Report relates to the risk of emissions to public health and the environment during construction and operation of the landfill.

2. Background

The Applicant proposes to establish an inert landfill within mining tenement CML 12/459, a previously mined coal deposit. The proposed landfill will primarily be used to dispose of used vehicle tyres and other inert waste from the Applicant's Ewington mining operations.

The proposal to dispose of inert materials will cause the premises to become a prescribed premises under the category of screening of material, as described in Table 1.

Table 1: Prescribed Premises Categories

Classification of Premises	Description	Approved premises production or design capacity or throughput
Category 63	Class I inert landfill site: premises on which waste (as determined by the reference to the waste type set out in the document entitled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer and as amended from time to time) is accepted for burial.	500 tonnes per annum (tpa)

3. Overview of premises

3.1 Infrastructure

The Muja Landfill facility, as it relates to Category 63 activity, is detailed in Table 2 and with reference to the Site Plan.

Table 2: Muja Landfill facility Category 63 infrastructure

Infrastructure	
Prescribed Activity Category 63	
Approximately 500 tonnes per year of Class I material as defined in the Landfill Waste Classification and Waste Definitions 1996 (As amended December 2009), will be buried in engineered trenches.	
1	Engineered trenches
2	Stormwater diverting bunds surrounding trenches
Contributory or Secondary Activities	
1	N/A

3.2 Construction and Operational aspects

3.2.1 Construction

The premises will be located in an area previously mined for coal and which has existing mine road infrastructure. The following site preparation and infrastructure will need to be constructed:

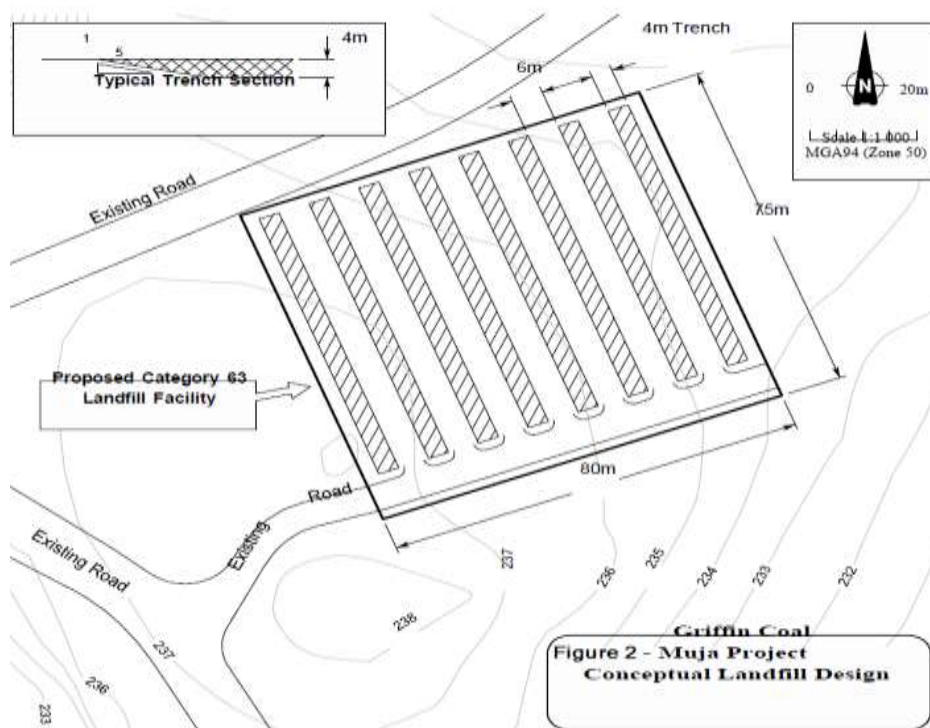
- Site levelling and preparation;
- Surface drainage lines; and
- Individual trenches.

3.2.2 Operation

Operation of the premises will be on an as-needed basis, with tyres being disposed of to allow Griffin coal to ensure their used tyre stockpile is below 100 at all times. Trenches will be engineered to slope down to a final depth, providing an exit to any fauna that may fall in. Waste will be disposed of in batches, meaning that whenever waste is disposed of, it will be covered within 24 hours. This will eliminate the conditions that may allow the breeding of mosquitoes if water were to accumulate within the tyres.

Trenches will be constructed one at a time, with a new trench being constructed when the previous trench is full. Cover material will be sourced from the spoils of digging each trench. The layout of the trenches is shown in Figure 2 below. The area of activity will be engineered to ensure stormwater runoff does not enter the trenches and is directed around the facility. Trenches will be filled with material and then covered with soil immediately. If a trench is needed to be exposed for longer than 24 hours, a temporary fence will be erected around the facility.

Machinery used for the land levelling, digging of the trenches, tyre placement and covering the waste will be serviced and housed at the nearby Muja fuel facility. No storage of chemicals, fuels or hydrocarbons will be undertaken onsite.



4. Legislative context

4.1.1 Background

The proposed location for the landfill was previously a coal mine which was established in 1953, prior to the *Environmental Protection Act 1986* coming into force.

4.2 Other relevant approvals

4.2.1 Department of State Development

The premises is located within State Agreement Lease CML 12/459 which is administered by the Department of State Development.

4.3 Part V of the EP Act

4.3.1 Guidance Statements

The overarching legislative framework of this assessment is the EP Act and EP Regulations. DER Guidance Statements which inform this assessment are:

- Guidance Statement: Regulatory Principles (July 2015)
- Guidance Statement: Setting Conditions (October 2015)
- Guidance Statement: Land Use Planning (October 2015)
- Guidance Statement: Licence Duration (November 2015)
- Guidance Statement: Decision Making (November 2016)
- Guidance Statement: Risk Assessment (November 2016)
- Guidance Statement: Environmental Siting (November 2016)

5. Consultation

The application was advertised on the Department of Environment Regulation website on 17 March 2017.

6. Location and siting

6.1 Siting context

The site is located in the Shire of Collie, approximately 17km to the south-east of the Collie Townsite. Surrounding land uses are coal mining, electricity generation and State Forest.

6.2 Residential and sensitive premises

The distances to residential and sensitive receptors are as follows:

Table 3: Receptors and distance from activity boundary

Sensitive Land Uses	Distance from Prescribed Activity
---------------------	-----------------------------------

Muja Power Station	Approximately 1.5 km south-west of the premises boundary.
Residential Premises	The closest sensitive receptor is a farmhouse, more than 3km east of the premises boundary.

6.3 Specified ecosystems

The distances to specified ecosystems are shown in Table 4.

Table 4: Specified ecosystems

Specified ecosystems	Distance from the Premises
Threatened Flora	1200m east of the premises boundary.
Wellington Dam catchment area – Country Areas Water Supply Act 1947 (CAWS) <i>priority not assigned</i>	Within and directly adjacent to the premises boundary.
Other relevant ecosystem values	Distance from the Premises
State Forest (24)	Within and directly adjacent to the premises boundary. However the area of the former coal mine where the landfill is to be situated has not been rehabilitated and remains un-vegetated.

6.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 5.

Table 5: Groundwater and water sources

Groundwater and water sources	Distance from Premises	Environmental Value
Chicken Creek	A minor, ephemeral creek line, Chicken Creek, is located approximately 850 meters east of the site. Chicken Creek is a tributary of the Collie River East branch, 5km north of the site.	Collie River East branch is a part of the Wellington Dam catchment and is regularly used for recreational activities.
Local groundwater	The proposed landfill site is 235 meters AHD, approximately 15 meters above the highest historically recorded groundwater level. The maximum depth of each trench will be 5 meters, giving a minimum separation distance to groundwater of 10 meters.	Water is not used for potable or used for industrial use. Groundwater in the region is generally brackish in nature, around 1 000 TDS.

6.5 Meteorology

Climate statistics for the local area are provided below.

6.5.1 Regional climatic aspects

Collie has a Mediterranean climate with hot dry summers and cool wet winters.

7. Risk assessment

7.1 Confirmation of potential impacts

Identification of key potential emissions, pathways, receptors and confirmation of potential impacts are set out in Tables 7 and 8 below. Tables 7 and 8 also identify which potential emissions will be progressed to a full risk assessment. Some potential emissions/impacts may not receive a full risk assessment where a potential receptor or pathway cannot be identified or where the emission/impacts are regulated under a Ministerial Statement.

Table 6. Identification of key emissions during construction

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning
Source (see Section 3.1 for infrastructure)	Construction, mobilisation and positioning of infrastructure	Vehicle movements on unsealed access roads	Noise	No residences or other sensitive receptors in proximity. Residential premises located over 3km east of the premises.	Air / wind dispersion	Potential amenity impacts	No	The Delegated Officer considers that the separation distance of greater than 3km between the source and the receptors is sufficient.
			Dust			Potential amenity and health impacts	No	
		Construction of new landfill cells and stormwater bunds	Noise			Potential amenity impacts	No	
			Dust			Potential amenity and health impacts	No	

Table 7: Identification of key emissions during operation

		Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning	
Source (see Section 3.1 for infrastructure references)	Waste disposal	Vehicle movements on unsealed access roads	Noise	Closest residential premises is located over 3km east of the premises	Air / wind dispersion	Potential amenity impacts	No	The Delegated Officer considers that the separation distance of greater than 3km between the source and the receptors means that the risk of impacts is acceptable.
			Dust			Potential amenity and health impacts	No	
		Covering of cells when full	Noise			Potential amenity impacts	No	
			Dust			Potential amenity and health impacts	No	
		Construction of new landfill cells	Noise			Potential amenity impacts	No	
			Dust			Potential amenity and health impacts	No	
		Fire risk (Tyres)	Air emissions		Potential health impacts on humans.	No	The Delegated Officer considers the risk from fire and mosquito breeding during operation of the landfill to be low, given the small volume of waste and the provisions set out in "Part 6 – Tyres" of the <i>Environmental Protection Regulations 1987</i> .	
			Firefighting water	Soil and groundwater	Direct discharge to land and groundwater infiltration			Land and groundwater pollution
		Breeding of mosquitoes in water accumulation in stored tyres	Mosquitoes (and potentially mosquito-carried pathogens)	Closest residential premises is located over 3km east of the premises	Air/wind dispersion	Potential health impacts on humans	No	

7.2 Risk Criteria

During the assessment the risk criteria in Table 9 below will be applied to determine a risk rating set out in this section 7.

Table 8: Risk Criteria

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost Certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High

Likelihood		Consequence		
The following criteria has been used to determine the likelihood of the risk / opportunity occurring.		The following criteria has been used to determine the consequences of a risk occurring:		
		Environment	Public Health* and Amenity (such as air and water quality, noise, and odour)	
Almost Certain	The risk event is expected to occur in most circumstances	Severe	<ul style="list-style-type: none"> on-site impacts: catastrophic off-site impacts local scale: high level or above off-site impacts wider scale: mid level or above Mid to long term or permanent impact to an area of high conservation value or special significance^ Specific Consequence Criteria (for environment) are significantly exceeded 	<ul style="list-style-type: none"> Loss of life Adverse health effects: high level or ongoing medical treatment Specific Consequence Criteria (for public health) are significantly exceeded Local scale impacts: permanent loss of amenity
Likely	The risk event will probably occur in most circumstances	Major	<ul style="list-style-type: none"> on-site impacts: high level off-site impacts local scale: mid level off-site impacts wider scale: low level Short term impact to an area of high conservation value or special significance^ Specific Consequence Criteria (for environment) are exceeded 	<ul style="list-style-type: none"> Adverse health effects: mid level or frequent medical treatment Specific Consequence Criteria (for public health) are exceeded Local scale impacts: high level impact to amenity
Possible	The risk event could occur at some time	Moderate	<ul style="list-style-type: none"> on-site impacts: mid level off-site impacts local scale: low level off-site impacts wider scale: minimal Specific Consequence Criteria (for environment) are at risk of not being met 	<ul style="list-style-type: none"> Adverse health effects: low level or occasional medical treatment Specific Consequence Criteria (for public health) are at risk of not being met Local scale impacts: mid level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	<ul style="list-style-type: none"> on-site impacts: low level off-site impacts local scale: minimal off-site impacts wider scale: not detectable Specific Consequence Criteria (for environment) likely to be met 	<ul style="list-style-type: none"> Specific Consequence Criteria (for public health) are likely to be met Local scale impacts: low level impact to amenity
Rare	The risk event may only occur in exceptional circumstances	Slight	<ul style="list-style-type: none"> on-site impact: minimal Specific Consequence Criteria (for environment) met 	<ul style="list-style-type: none"> Local scale: minimal to amenity Specific Consequence Criteria (for public health) met

^ Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting*.

* In applying public health criteria, DER may have regard to the Department of Health's, *Health Risk Assessment (Scoping) Guidelines* "on-site" means within the prescribed premises boundary.

7.3 Risk Treatment

DER will treat risks in accordance with the Risk Treatment Matrix in Table 10 below:

Table 9: Risk Treatment

Rating of Risk Event	Acceptability	Treatment
Extreme	Unacceptable.	Risk event will not be tolerated. DER may refuse application.
High	Acceptable subject to multiple regulatory controls.	Risk event will be tolerated and may be subject to multiple regulatory controls. This may include both outcome-based and management conditions.
Medium	Acceptable, generally subject to regulatory controls.	Risk event is tolerable and is likely to be subject to some regulatory controls. A preference for outcome-based conditions where practical and appropriate will be applied.
Low	Acceptable, generally not controlled	Risk event is acceptable and will generally not be subject to regulatory controls.

8. Appropriateness of Works Approval conditions

The conditions in the Issued Works Approval in Attachment 1 have been determined in accordance with DER's *Guidance Statement on Setting Conditions*.

Condition Reference	Grounds
Environmental Compliance Condition 1	Environmental compliance is a valid, risk-based condition to ensure appropriate linkage between the works approval and the EP Act.
Premises: 2 and 3	These conditions are valid, risk-based and consistent with the EP Act.
Location of Works: 4	This condition is valid, risk-based and consistent with the EP Act.
Infrastructure and Equipment 5, 6 and 7	These conditions are valid, risk-based and contain appropriate controls (see section 9).
Records and Information: 8 and 9	These conditions are valid and are necessary administration and reporting requirements to ensure compliance.
Reports: 10 and 11	
Requests for Information: 12	

DER notes that it may review the appropriateness and adequacy of controls at any time, and that following a review, DER may initiate amendments to the works approval under the EP Act.

9. Applicant's comments

The applicant was provided with the draft decision report and draft issued works approval on 3 March 2017. A summary of applicant comments is summarised in Appendix 2.

10. Conclusion

This assessment of the risks of activities on the premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this decision report (summarised in Appendix 1).

Based on this assessment, it has been determined that the Issued Works Approval will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Tim Gentle

Manager Licensing – Resource Industries

Delegated Officer

under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key Documents

	Document Title	In text ref	Availability
1	Application for Works Approval		DER records zA106209
2	DER <i>Guidance Statement on Regulatory principles</i> , July 2015	DER 2015a	accessed at http://www.der.wa.gov.au
3	DER <i>Guidance Statement on Setting conditions</i> , September 2015	DER 2015b	
4	DER <i>Guidance Statement on Licence duration</i> , November 2014	DER 2014	
5	DER <i>Guidance Statement on Licensing and works approvals processes</i> , September 2015	DER 2015c	

Appendix 2: Summary of Applicant's Comments on Risk Assessment and Draft Conditions

Comments received	DER consideration of risk:
<p>Paul Richardson, Griffin Coal, 7 March 2017</p> <ul style="list-style-type: none"> Change to Infrastructure Requirement Table to read 5m x 75m rather than 5 x 75 metres to avoid ambiguity. 	<ul style="list-style-type: none"> Comment accepted. See changes summarised in comment below.
<p>Paul Richardson, Griffin Coal, 7 March 2017</p> <ul style="list-style-type: none"> Request for ranges to be placed within Infrastructure Requirements Table and Schedule 2 to allow flexibility in construction for best design. 	<ul style="list-style-type: none"> Comment accepted. The following specification ranges have been included in the tables: <ul style="list-style-type: none"> Trench depth – no more than 4 m Trench width – 4-6 m Trench length – 75 m Space between trenches – 2-6 m
<p>Paul Richardson, Griffin Coal, 7 March 2017</p> <ul style="list-style-type: none"> Request for clarity as to when works are considered to be completed followed by submission of a compliance document. 	<ul style="list-style-type: none"> Condition 6 of the Works Approval has been amended to specify that one compliance document following construction of the first trench only is required to be submitted to the CEO.

Attachment 1: Issued Works Approval W6029/2017/1
