Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for licence amendment

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

Licence number	L5938/1967/12
Licence holder	BP Refinery (Kwinana) Pty Ltd
ACN	008 689 763
DWER file number	DER2016/000518
Premises	BP Kwinana Refinery Mason Road KWINANA BEACH
Date of report	17/06/2022
Status of report	Final

1. Decision summary

Licence L5938/1967/12 is held by BP Refinery (Kwinana) Pty Ltd (licence holder) for the BP Refinery Kwinana (the premises), located at Lot 18 Mason Road, Kwinana Beach.

This 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 L5938/1967/12 has been granted.

The revised licence consolidates and supersedes the existing licence previously granted in relation to the premises and has been granted in a new format.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this report, the delegated officer has considered and given due regard to the department's regulatory framework and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2.2 Summary

2.2.1 Background

In February 2021, the licence holder ceased refining oil at the premises. It now plans to convert the site solely into a fuel import terminal using the existing storage infrastructure.

The site is currently in various stages of decommissioning, which includes placing some infrastructure into care and maintenance and removing redundant infrastructure. There are no longer air emissions at the premises following the cessation of oil refining activities.

In September 2021, the licence holder was granted a works approval for the installation of two new gas-fired steam boilers at the premises to support the proposed fuel import activities (W6563/2021/1). Once constructed, the new boilers will be the only point source of emissions to air at the premises.

2.2.2 Proposed amendment

The licence holder seeks the following amendments to its existing licence L5938/1967/12:

- remove conditions for the authorisation, control, monitoring and reporting of point source emissions to air;
- modify the reporting conditions consistent with the changes in monitoring conditions;
- update prescribed premises categories by removing category 34: *Oil or gas refining* and category 61A: *Solid waste facility*, and inserting category 73: *Bulk storage of chemicals* and category 87: *Fuel burning*;
- remove conditions relating to seawater cooling, as this activity is no longer being undertaken;
- the following land farm conditions have been amended to reflect the quality assurance program (QAP) for that activity:
  - Operational requirements for the land farm in condition 1;
  - Land farm monitoring conditions in condition 12; and;
- inclusion of a condition allowing the receival of oily wastewater from maintenance of BP pipelines external to the premises boundary.

3. Risk assessment

Removal of redundant conditions

The delegated officer considers the scope of requested amendments relating to the removal of conditions pertaining to the previous oil refining activities on the premises do not require further risk assessment.

Point source emissions to air have ceased following the completion of oil refining activities. Use of seawater for cooling has also ceased eliminating the risk of free chlorine, change in temperature and leaking of product into the cooling water stream, and potentially into Cockburn Sound.

The premises is currently classified as 'contaminated – remediation required' under the *Contaminated Sites Act 2003* (CS Act). Residual contamination issues from historical activities on the premises will continue to be managed under the CS Act.

New proposed changes

For all other proposed changes, the below table describes the risk events associated with the amendments consistent with the *Guideline: Risk Assessments* (DWER 2020). The table identifies whether the risk events are acceptable and tolerated, or unacceptable and not tolerated, and the appropriate treatment and degree of regulatory control, where required.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this report are detailed in Table 1 below.

Table 1 also details the control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Emissions, sources, pathways and licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Combustion gases form burning of natural gas	Burning natural gas to produce steam	Air/windborne pathway	Low NOx burners. Burner management system Continuous measurement of O_2 with automatic damper control
Leaks and spills of hydrocarbons	Storage tanks and associated pipework	Direct discharge to land and flow to Cockburn Sound	Bunding of tanks and pipework Clean up of spilled hydrocarbon
Contaminated wastewater	Handling of fuels in tank farm. Maintenance of external pipelines	Direct discharge to land and flow to Cockburn Sound	Treatment in wastewater treatment plant and discharge to Sepia Depression ocean outlet landline (SDOOL)
Soil and groundwater contamination	Treatment of contaminated soil and sludge at land farm	Direct discharge to soil and infiltration to groundwater	Incorporation of soil and sludge limited to top 30cms. Control and monitoring of pH, and nutrients.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the delegated officer has excluded employees, visitors and contractors of the licence holder 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: Human and environmental receptors and distance from the premises

Human receptors	Distance from prescribed activity
Closest residential receptor	2 km from the premises
Industrial premises	Adjacent to the premises

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 in-complete 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 3.

The amended licence L5938/1976/12 that accompanies this report authorises emissions associated with the operation of the premises, i.e., fuel burning, wastewater treatment and chemical storage.

The conditions in the amended licence have been determined in accordance with *Guideline: Setting Conditions* (DWER 2020).

Table 3. Risk assessment of potential emissions and discharges from the premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Reasoning
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Operation								
Operation of steam boilers	Combustion gases including NOx	Air/windborne pathway	Residents 2 km east and adjacent industrial facilities	See Table 1	C = Slight L = Unlikely **Low Risk**	Y	NA	Modelling and confirmation monitoring conducted under W6563
Wastewater Treatment	Process wastewater	Direct discharge to land and flow off site	Onsite and adjacent soil. Cockburn Sound	See Table 1	C = Minor L = Rare **Low Risk**	Y	1, 3, 4,5, 6,7, 8 and 9	The total quantity of process wastewater treated at the premises has been significantly reduced.
Land farming	Hydrocarbons and metals	Direct discharge to soil and infiltration to groundwater	On-site soil and groundwater	See Table 1	C = Minor L = Rare **Low Risk**	Y	1, 12 and 13	Key management actions taken from QAP under existing licence and imposed on revised licence
Storage of Chemicals	Leaks and spills of hydrocarbons	Direct discharge to land and flow offsite	Onsite and adjacent soil. Cockburn Sound	See Table 1	C = Moderate L = Rare **Medium Risk**	Y	NA	Requirements are addressed by the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

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

3.3 Addition of new categories

Category 73: Bulk storage of chemicals

Bulk storage of chemicals greater than 1,000 m^3 was not listed separately on the existing licence whilst the oil refinery was operational, as it was included within the scope of category 34. With the conversion of the facility to a fuel import depot and removal of category 34, it is now listed as a separate category for the licence of the premises.

No additional tanks have been installed at the premises, however some modifications to the existing pipework has been carried out as part of the decommissioning of the oil refinery.

No additional conditions are necessary for this category and the storage is also addressed by the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007.

Category 87: Fuel burning

Construction of two boilers to produce steam was authorised by W6563 and a compliance report for the first of these boilers was submitted in December 2021. Steam was previously supplied to the premises from an off-site generator.

Category 87 has been added to the licence, to provide the necessary authorisation for operating the new boilers. The combined design capacity of the new boilers is 948 kg/hr.

A risk assessment for the new boilers, including air dispersion modelling, formed part of the assessment for W6563, with validation monitoring of stack emissions required during the commissioning period. No additional conditions are required to be added to the revised licence regarding operation of the new boilers.

3.4 Waste management area

The premises comprises a solid waste treatment area with three land farm cells and a double lined cell for treatment of oily tank sludge. The land farm cells are used for bioremediation of sludges and contaminated soils. Management of the land farm is critical to prevent further contamination of shallow groundwater beneath the site.

The waste management area is managed by BP under a QAP which describes the operation and monitoring of the land farm cells. Key management actions within the QAP have been imposed on the revised licence to cover the management of the land farm cells. These include operational aspects (condition 1) and monitoring (condition 12).

3.5 Use of Quality Assurance Programs

The existing licence includes conditions that refer to other documents, such as management plans, which is inconsistent with the department's current regulatory framework.

The existing licence refers to 12 QAPs – six of which are made redundant by the cessation of air emissions and one by the closing down of the cooling water system.

The remaining QAPs relate to:

- Sampling and analysis of groundwater monitoring wells;
- Air sparge system monitoring procedure;
- Wastewater quality assurance procedure;
- Waste management area monitoring procedure, and;
- Quality assurance procedure ambient air quality monitoring network.

Of these, only the *Waste management area monitoring procedure* is referenced by a specific condition.

The existing licence requires that water sampling is to be taken according to approved QAPs. This has been amended to require sampling be taken in accordance with relevant Australian Standards (i.e., AS/NZS 5667 series).

3.6 Air sparging system

The licence holder has submitted a report from GHD into the remedial drivers that require the continued operation of the air sparge system in the east of the refinery, the PICL system.

The report concluded that in regard to the 3 remedial drivers; migrating light non-aqueous phase liquids (LNAPL), dissolved phase plume, and, source, pathway receptor (SPR) linkage there are no applicable remedial drivers and no corresponding active site management options that would justify the continued operation of the PICL system.

4. Decision

4.1 Amendments

Removal of redundant conditions

The delegated officer has determined to remove redundant conditions relating to monitoring and reporting of emissions to air and conditions relating to the saltwater cooling system. This determination is based on the following:

- the refinery ceased refining crude oil in February 2021;
- emissions to air from the steam boilers when they are installed are low enough such that they will not require on-going monitoring, and:
- saltwater cooling ceased in September 2021.

Addition of new categories

The delegated officer has added categories 73 & 87 to the licence, due to:

- bulk storage of chemicals has been integral the oil refinery and no significant changes are happening to this storage as a result of change to fuel import depot; and
- the two small steam boilers to be installed under W6563 have been deemed as presenting a low risk of impacts for emissions to air.

Land farm conditions and QAPs

The delegated officer has determined that existing conditions referencing QAPs will be replaced with specific conditions in the form of management actions taken from the QAPs, to ensure there is an acceptable risk of impacts to public health and the environment from ongoing management of process wastewater and the land farm operations.

Acceptance of oily wastewater

The delegated officer notes oily wastewater from the maintenance of external BP pipelines has been accepted and treated at the premises for several years. This activity has been formalised on the licence as an authorised activity, also noting the overall volumes of wastewater treated at the premises has reduced.

Air sparging system

The delegated officer notes that the PICL air sparging system is no longer required and reference to two air sparging system in the licence has been removed. The dune air sparging system remains in operation as a requirement of the licence.

4.2 Consolidation of licence

Table 4: Licences consolidated in this amendment

Instrument	Issued	Summary of approval
L5938/1967/12	05/05/2011	Licence granted.
L5938/1967/12	27/06/2013	Licence amendment changing the requirements for SO_2 CEMS

Instrument	Issued	Summary of approval
		availability
L5938/1967/12	29/04/2016	Expiry date extended to 08/05/2033
L5938/1967/12	27/10/2016	Amendment Notice 1. Changes in requirements for reporting of spills, changes in reporting requirement for groundwater contamination and removal of greenhouse gas reporting
L5938/1967/12	02/10/2019	Amendment Notice 2. Removes bitumen manufacturing category and amending CEMS monitoring conditions to reflect commissioning of new CEMS

In consolidating the licence conditions, the delegated officer has:

- updated the format and appearance of the licence;
- 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 full consolidation of licence conditions as they relate to the revised licence are summarised in section 6.1. Previously issued amendment notices will remain on the department's website for future reference and will act as a record of the department's decision making.

5. Consultation

The Licence Holder was provided with the draft Decision Report and draft issued Licence on 24 March 2022. The licence holder provided comments on 13 April 2022 which are summarised, along with DWER's response, in Appendix 1.

As a number of changes were made to the draft licence in response to the licence holder's comments, a further draft revised licence was provided for comment on 27 May 2022 and the licence holder replied on the 1 June 2022 with some clarifications also summarised in Appendix 1.

6. Conclusion

Based on the assessment in this 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.

6.1 Summary of amendments

The below table 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 5: Changes to licence conditions in this amendment

Existing condition	Condition summary	Revised Licence condition	Notes
N/A	Expiry Date: 08 May 2016	Expiry Date: 08 May 2033	In accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016)
N/A	Prescribed Premises Category table	Added to front page of licence	Revised to current licensing format

Existing condition	Condition summary	Revised Licence condition	Notes
N/A	Definitions	Interpretation section, Definitions and Table 10	Redundant condition. Revised to current licensing format.
G1(a) to G1(c)	Exceedance Reports	Conditions 19 to21	Revised to current licensing format.
G2(a) to G2(b)	General Reporting Requirements relating to emissions to air	N/A	Redundant conditions deleted as part of this amendment
G3	Annual Report	Condition 18 and Table 8	Revised to current licensing format.
G4(a) to G4(c)	Quality assurance program	NA	Redundant condition. Adequately covered by alternative existing conditions. Deleted from licence.
G4(d)	Use of NATA accredited labs for water analysis	Condition 09	Revised to current licence format
A1, A2, A3(a) to A3(c), A4, A5	Monitoring of emissions to air	N/A	Redundant conditions deleted as part of this amendment
W1(a)	Recovery of spills	NA	Redundant condition deleted as part of this amendment
W1(b)	Report on spills	N/A	Redundant condition. Deleted from licence by Amendment Notice 1.
W2(i) and W2(ii)	Groundwater monitoring program	Conditions 10	Renumbered and revised to current licence format.
W2(iii)	Reporting groundwater monitoring	Condition 18 and Table 8	Revised to current licence format.
W3	Free phase hydrocarbon recovery programme	Condition 2	New numbering
W4(a)	Annual Report on groundwater monitoring and remediation	Condition 18 and Table 8	Revised to current licence format
W4(b)	Triannual report on groundwater remediation	NA	Removed by Amendment Notice 1
M1(a) to M1(b)	Monitoring of cooling water	NA	Redundant condition because of cessation of cooling water use
M2(a) to M2(d)	Oil leaks to cooling seawater	NA	Redundant condition because of cessation of cooling water use
M3(a) and M3(b)	Cooling Seawater Discharge limits	NA	Redundant condition because of cessation of cooling water use
M4(a) and M4(b)	Monitoring of process wastewater	Condition 7 and Table 5	Revised to current licence format

Existing condition	Condition summary	Revised Licence condition	Notes
M5	Authorised discharge points for process wastewater	Condition 4 and Table 2	Revised to current licence format
M6(a) and M6(b) Table 5	Discharge limits for process wastewater	Condition 6 and Table 4	Revised to current licence format
S1(a) and S1(b)	Oily waste sludge disposal	Condition 1 and Table 1 Condition 12 Table 7	Revised to current licence format
S1(c)	Annual report of land farm operations	Condition 18 and Table 8	Revised to current licence format
P1 to P3(a)	EPP for atmospheric discharge monitoring of SO_2 emissions	NA	Redundant conditions deleted as part of this amendment. No SO_2 discharge
*P3(a) to P5(c)	Ambient and meteorological monitoring for EPP	Conditions 22 to 29	Renumbered
NA	Complaints	Condition 14	Standard condition for current format licences
NA	Maintenance of records	Condition 16 and 17	Standard conditions for current format licences
NA	Annual Audit Compliance Report	Condition 15	Standard condition for current format licences
Attachment 2	Authorised emission points for discharges to air	NA	Redundant conditions deleted as part of this amendment
Attachment 3	Quality Assurance Programs	NA	Redundant conditions deleted as part of this amendment
Attachment 4	Schematic of Wastewater treatment plant	Schedule 1 figure 2	Updated version
Attachment 5	Effluent outfall sample analysis	Condition 7 and Table 5	Revised to current licence format
Attachment 6	Reporting requirements	Condition 18	Revised to current licence format
Schedule 1: Maps	Premises map missing from existing licence	Schedule 1: Maps figure 1	Updated map

Note 1: the existing licence has 2 conditions with the same number P3(a)

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder comment	Delegated Officer response
1 (Tank Farm)	The tank farm was built in 1956 and does not comply with AS 1940, instead the tanks are fitted with high level alarms if they are flammable liquids and most of the combustible liquid tanks. The licence holder advised the tanks are inspected daily and have unexpected movement alarms to alert the terminal operator if the level drops when there is no planned transfer of product. Vacuum tankers are permanently located onsite and available to pump stormwater or spilt materials if required	In taking into account the reasoning from the licence holder and the alternative controls it implements to address gaps in design against AS 1940 to manage risks, the delegated officer removed references to AS 1940 in Table 1 of the licence.
1 (Fuel Burning)	The licence holder queried the requirement for a sampling port on the steam boilers as no stack testing is required.	The delegated officer noted that sampling ports were installed under works approval W6563/2021/1 used to validate emissions post-construction. The department's risk assessment for that works approval did not identify a need for ongoing stack monitoring of the steam boilers there the delegated officer agreed and removed the requirement for the ports.
1 (wastewater treatment plant)	The licence holder provided clarification of size of the tanks and minor name changes to accurately represent the wastewater treatment plant. An updated schematic was supplied.	No impact on emissions and discharges or risk. Licence updated with name changes and the updated schematic in Schedule 1 of the licence was included.
1 (wastewater treatment plant)	Clarification: The wastewater treatment plant was built in 1993 under Works Approval W17/67/2. Tanks built for that works approval have earthen bunds with HDPE liners. Various parts of WWTP are not bunded. The Equalisation Tank 801 has a HDPE liner and is in an earthen bund. The equalization tank Tank 801 collects all stormwater and oily water to ensure uniform quality and flow conditions for downstream of WWTP. Tank 801 has a high level alarm which alarms remotely to central control room. Operations can divert process water to two stormwater tanks with a capacity of 6.3 ML and 3.3 ML respectfully, to ensure there is no overfill of T801. The polishing ponds can also be used for stormwater ullage if required. The wastewater treatment plant's average throughput has decreased by 75% since refining operations ceased. Due to the lower flow, it takes a	Reasoning consistent with row 1 (tank farm). References to AS 940 removed.

Condition	Summary of Licence Holder comment	Delegated Officer response
	longer time to fill the stormwater tanks than previously and there is approximately 4-5 days of ullage available. The polishing ponds can provide an additional 10 days each of ullage if required.	
Table 1 (land farm facility)	Clarification: The landfarm cells 1,3 and 4 are unlined by design in accordance with Works Approval W17/67/6. The soil and groundwater at the cells are monitored through a rigorous monitoring program, the results of which are used to manage contaminant loads onto and through the cells. The landfarm area is not bunded or has a collection sump. Cells 1, 3 and 4 have raised sides but are unlined. Cell 2 is double lined with HDPE with raised sides. The area is sloped to a corner where a sump collects any runoff. Liquid from the sump is pumped to the wastewater treatment plant for treatment.	The delegated officer asked for clarification in the first draft provided to the licence holder. Response is noted and no further changes required.
Table 2	Suggested wording of condition should be changed to allow some waste water from terminals.	Taking into consideration the excess capacity of the wastewater treatment plant the delegated officer accepts that this will not increase the risk from wastewater treatment at the premises and the wording of the condition has been amended.
Table 7	Remove fluoride as analyte from table 7 because source of fluoride was decommissioned when the refinery operations ceased.	Noted. Fluoride removed.
Table 7	Remove reference to polishing pond from process wastewater because process wastewater can be discharged without passing through the polishing pond.	Noted and updated.
Table 7	Propose new condition because the sampling is restrictive, and the licence holder will potentially be exposed to licence non-compliance during days or weeks where no discharge occurs.	The delegated officer took into account the reasoning around the reduced load on the wastewater treatment plant and that waste is no longer discharged every day. The wording was updated to address the comment.
Table 7	Delete cooling seawater inlet and discharge point analysis for temperature as the cooling seawater system has been decommissioned.	Noted and updated.
Table 7	Amend the words “weekly composite sample made of daily composites” to “daily composite tested once per week”.	Taking into account the reduced risk of metals contamination from the fuel terminal compared to the oil refinery the delegated officer accepts that this change of wording is appropriate.

Condition	Summary of Licence Holder comment	Delegated Officer response
Table 8	Oil monitoring for thickness of oil should be amended because it is monitored at various well locations depending on the occurrence and distribution of oil beneath the site. Different wells are monitored monthly and annually.	Taking into account the reduction in LNAPL since the year 2000 the delegated officer has determined to remove the requirement for monitoring the thickness of oil.
Table 8 and Figure 4	Amend the wording to Monitoring Wells as shown if Figure 4 Schedule 1. The diagram attached (figure 4 schedule 1) was out of date please refer to attachment for updated diagram.	Updated map included as Schedule 1 Figure 4.
Table 8	Six additional analytes have been included Antimony, Aluminium, Iron, Molybdenum Selenium and Tin. Please confirm why these analytes have been added.	On review the delegated officer identified this as an error and the analytes in question were removed.
Table 9	Change from “two replicate samples per cell” to “two composite samples per cell”. The samples taken are not replicated they are two composite samples of each half of the cell.	Agreed and updated.
Table 9	BP has not previously sampled for antimony. Remove antimony from list.	Agreed, likely error and removed.
Table 9	Remove “1 full core length per cell” because the licence holder does not take one full core length per cell but tanks samples at different depths to determine parameter migration through the soil.	The delegated officer accepts that the method of taking samples at different depths is sufficient to manage risk of contamination from the land farm. Alternative wording has been used.
Table 10 condition 9	Please clarify meaning of “datasheets for monthly and annual monitoring in accordance with Table 7” Table 7 specifies daily or twice weekly analysis.	On review the delegated officer was of the view that including daily and twice weekly datasheets in the Annual Environmental Report will be a significant reporting burden and not commensurate with risk therefore that part of Table 10 was removed.
Table 10 condition 12	Reword condition to: “Tabulated groundwater monitoring data for all wells over a four-year period and time series graphs for selected wells including those demonstrating significant differences between the current year and previous years result” Clarification: This new requirement will generate > 2000 additional graphs. (66 wells x 33 analytes = 2178) Currently we report time series graphs of parameters that are changing significantly.	As above.
Table 10	Fix spelling error and reference error	Noted and updated.

Condition	Summary of Licence Holder comment	Delegated Officer response
condition 12		
Table 10 condition 14	Alter the wording of the condition to “Results of groundwater and soil monitoring conducted in accordance with conditions 12 (Landfarm and upgradient wells only) and 14	The delegated officer notes that the draft licence has asked for reporting of groundwater monitoring results twice in the Annual Environment Report and has removed this reference to condition 12.
Updates to Figures in Schedule 1	Remove cooling water in-let in Figure 1. Updated Figures 2, 3 and 4 supplied.	Updates included in the licence.
Submission from 1 June 2022		
Table 1 tank farm	Clarification of wording around high level alarms and unexpected movement alarms. Addition of words “As part of operator routines” to daily inspections	The delegated officer adopted the clarified wording, however considered the wording around daily inspections was no consistent with the department’s Guidance Statement: Setting Conditions and this was not adopted.
Table 1 Land farm facility	Clarification that Cell 2 is double lined but not on a hardstand	The delegated officer removed the word hardstand from the condition
Table 7	Sampling for pH is done on a grab sample not a composite sample so that pH can be analysed within its holding time.	The delegated officer has amended the table to reflect this fact.
Table 9	Change the wording of the sampling conditions to make consistent with method.	Wording has been changed to “1 core per cell with 3 depth interval samples”.