Government of Western Australia
Department of Water and Environmental Regulation

Amendment Notice 1

Licence Holder	Phosphate Resources Ltd
Licence Number	L8846/2014/1
File Number	DER2014/002338
Category	05 – Processing or beneficiation of metallic or non-metallic ore 58 – Bulk material loading or unloading
Premises address	Christmas Island Phosphate Mine Christmas Island INDIAN OCEAN TERRITORIES WA 6798 Being Lot 47 and 48 on Plan 218106, Lot 51 on Plan 218108, Lot 53 on Plan 218110, Lot 197 on Plan 218134, Lot 482 and 488 on Plan 219653, Lot 554 on Plan 221294, Lot 622 on Plan 43303, Lot 637 on Plan 43304, Lot 3001 and 3002 on Plan 41813, and Lot 3022 on Plan 43297.
Expiry date	23 February 2025
Date of amendment	**31 January 2018**

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act and follows.

Date signed: 31 January 2018

Christine Hass

A/MANAGER LICENSING (WASTE INDUSTRIES)

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

Amendment Notice

This DWER initiated amendment is made pursuant to section 59 of the *Environmental Protection Act* 1986 (WA)(CI) (EP Act) to amend the licence issued under the EP Act for a Prescribed Premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment of the following:

1. Administrative changes to six conditions of the Licence;
2. Inclusion of additional management actions within condition 1.3.6;
3. Inclusion of improvement actions through the addition of condition 1.3.16;
4. Change to CIP Monitoring point locations for the new laboratory.

No other changes to any other aspects of the original licence have been undertaken by DWER or via request from the proponent.

The following DWER Guidance Statements have informed the decision made on this amendment:

- *Guidance Statement: Regulatory Principles* (July 2015)
- *Guidance Statement: Land Use Planning* (February 2017)
- *Guidance Statement: Decision Making* (February 2017)
- *Guidance Statement: Risk Assessment* (February 2017)
- *Guidance Statement: Licence duration* (August 2016)

Amendment Description

A compliance inspection of the Christmas Island Phosphate Mine undertaken on 16 August 2017 identified that the Licence did not adequately address issues relating to dust and hydrocarbon emissions. DWER has instigated an amendment of Licence L8846/2014/1 to address these issues.

In addition, minor administrative changes have been made to more accurately reflect the processes and operation of the Premises.

Location, environmental siting and potential receptors

Phosphate Resources Limited (PRL) operates a phosphate mine on various lots across Christmas Island, with associated processing and export operations trading as Christmas Island Phosphates (CIP).

CIP is currently recovering stockpiled phosphate ore from previously cleared areas and conducting some in-situ mining, under Mining Lease MCI 70/1A and MCI 70/10, granted by the Commonwealth in 1997. The current lease was re-negotiated with the Commonwealth Government to recover phosphate ore from existing stockpiles and in-situ resources within the existing mining area until 2034.

CIP operates phosphate reclamation, materials handling and processing facilities.

Facilities within the company's operations are grouped as follows:

- Mining Fields;
- ROM/ MLI34: Run of Mine Stockpile Area/mining equipment stand down area;
- Dryers Precinct;
- Cross Country Conveyors (PS10/C1-05) from Dryers Precinct to Downhill Silos;
- Downhill Conveyors (D8-D13) from top of incline to Ship loading Precinct;
- Wharf/Ship loading Precinct for loading and Dust bagging area;
- Laboratory for testing and analysis of phosphate product grade;
- Workshops;
- Finance/Administration Offices; and
- Incinerator on Lot 622 on Plan 43303 for the incineration of hydrocarbon contaminated wastes.

The depth to groundwater is currently unknown for the Premises. Groundwater levels are influenced by the location of the unconfined water table within the karst limestone aquifers. Information supplied from 'Water Corporation' shows that groundwater depth on the Island varies between 50 to 100 mBGL.

There is no surface water catchment network on the island, with surface water being fed in two areas from natural springs ('Hosnie' and 'Dales'). Mining is not planned or approved on or directly adjacent to these sites and hence risk is considered negligible for direct impacts on surface water systems, as a result of CIP operations.

Monitoring probes were placed within the dryer stack for assessing baghouse filter operation. In addition, temperature probes are present within the stack.

The main emissions from the Premises include air emissions, storm water runoff, dust and sedimentation. The addition of the incinerator is considered to potentially increase cumulative emissions to air from point source emissions via the incinerator stack.

DWER GIS dataset desktop assessment of potential sensitive receptors to the activities of the Prescribed Premises operation, are shown in the tables below.

Table 2 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises.

Table 2: Receptors and distance from Prescribed Premises

Residential and sensitive premises	Distance from Prescribed Premises
Unallocated Crown Land (UCL)	Surrounds significant areas of the Prescribed Premises boundary
'Recreation' zoned land use	Adjoining the wharf precinct area of the Prescribed Premises.
Residential area	Adjoining mining lease area
Commercial use area	Adjoining mining lease area

Table 3 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises.

Table 3: Environmental receptors and distance from Prescribed Premises

Environmental receptors	Distance from Prescribed Premises
Local Authority Reserves (Unallocated Crown Land)	Adjoining mining lease area
Groundwater resource	Approximately 50 m – 100 mBGL, fresh to brackish quality.
Surface water resource ('Hosnie' & 'Dales' springs)	No mining lease approvals given to operate over these areas.
Christmas Island National Park	Adjoining mining lease area
Indian Ocean	Adjoining mining lease area (Wharf precinct)

Risk assessment

The proposed inclusion of two additional conditions into the Licence, relating to improvement actions and management actions, are associated with the potential material risk to human health or the environment from the operation of the Premises. These have been included as a result of dust and hydrocarbon emissions associated with the following sources:

- **Dust**: Wood (metal) screen, Crusher, Conveyor PS1, Rock Silos 11 – 14, Dust Silos 11-12 and Bagging Dust Silo's 1-4.

  Issues of dust are predominantly as a result of old/ aging infrastructure that requires upgrade or repair to minimise the amount of ambient dust emissions being emitted off a number of sources (Bagging dust silos). Some of these emissions are also as a result of the locality of infrastructure and wind channeling which is resulting in excessive lift off of dust particulates into the environment (from the wood screen, crusher and associated conveyor, rock and dust silos) which is descending into the Kampong town site, Flying Fish Cove and into the wharf precinct area.

  Assessment of the TEOM monitoring data submitted over the last few years, even with significant upgrades undertaken at the wharf precinct, has shown decrease but has not eliminated the amount of ambient dust emissions being recorded. In addition, the monitoring data is also showing elevated readings outside of shipping and bagging operations. The Licensee has concerns regarding the efficacy of the TEOMs in a high humidity environment. However, additional questions around the additional sources of potential ambient dust emissions also pose concern. Inspections carried out during 2016 and 2017 have shown extensive ambient dust concentrations disseminating from the above identified sources. These sources are therefore considered additional areas for necessary action required to ensure compliance to the active Licence conditions.

- **Hydrocarbon**: Wash down bay at the workshop, bunded outdoor hydrocarbon storage areas and outdoor bunded engine facilities.

  There are various locations throughout the processing and operation areas of the Premises that have the potential to emit hydrocarbon emissions, with the majority being of small volume, as spills or leaks. All infrastructure associated with hydrocarbon usage (excluding vehicle machinery) is located on hardstand. Engine facilities are bunded with residual hydrocarbon material or leaks adequately captured. Hydrocarbon contaminated soil is collected and contained within drums and stored at the old remediation pad area for later disposal, once the incinerator is operational. However, the workshop area, which has an oil/ water separator and sump for the wash down bay, has the ability to discharge hydrocarbon contaminated waste water to land and subsequently surface water.

  It has been identified that the sampling process for monitoring has not been adequately undertaken which may inadvertently result in contamination of the surrounding area through the current processes being used to monitor hydrocarbons. As a result, a condition has been defined to ensure appropriate monitoring locations and management actions are in place to address potential issues of elevated hydrocarbons in the discharge waste water, prior to release into the environment.

A risk assessment has been included within this amendment notice to assess risk associated with the identified sources of dust and hydrocarbons. The resultant inclusion of additional conditions within the active Licence (L8846/2014/1) is considered to give additional and appropriate regulatory controls associated with these emissions. The dust and hydrocarbon sources are considered to present a potential material risk to human health or the environment and therefore require additional regulatory controls.

Table 4 below describes the Risk Events associated with the amendment, and is consistent with the *Guidance Statement: Risk Assessment (February 2017)*.

Table 4: Risk assessment for proposed amendments during operation

Risk Event						Consequence rating	Likelihood rating	Risk	Reasoning
Source/Activities		**Potential Emissions**	**Potential Receptors**	**Potential Pathway**	**Potential Adverse Impacts**				
Wood (metal) screen, Crusher, Rock Silos 11 – 14, Dust Silos 11-12 and Bagging Dust Silos 1-4	Processing and storage of product (ore)	Dust	Sensitive receptors adjacent/ adjoining the Premises	Air/ Wind	Health and amenity.	Moderate	Possible	Medium	Sensitive receptors are located adjacent/ adjoining the Prescribed Premises boundary. Dust complaints are an ongoing issue and require continuous monitoring and management. Infrastructure at the Premises is aging, and requires upgrade. Two inspection processes have identified these areas as sources of concern. Additional regulatory controls required.
Wash down bay at the workshop, bunded outdoor hydrocarbon storage areas and outdoor bunded engine facilities	Storage and processing of hydrocarbons or hydrocarbon contaminated water	Hydrocarbons	Soil Surface water (Indian Ocean) Vegetation	Land	Contamination of localised soil profile, impact on soil microbes and vegetation, contamination of surface water and impact to aquatic life.	Minor	Possible	Medium	Although the potential exists for some contamination to occur, the size and scale of contamination is considered moderate to low, however impact is still possible. Additional regulatory controls are required.

Decision

The Delegated Officer considers that the following administrative changes undertaken through this amendment process do not change any of the obligations of the Licence Holder for the ongoing management of the Premises in accordance with DWER regulatory controls. The administrative changes include:

1. The 'Interpretation' section of the Licence has been amended to reflect the updated email contact details;
2. Condition 1.2.1 has been expanded to clearly define the monitoring equipment being operated and maintained at the Premises;
3. Inclusion of a map identifying monitoring points for emissions to land within the Premises boundary;
4. Condition 2.2.1 has been amended to include additional detail to specify the baghouses operated at the Premises;
5. Condition 3.3.1 has been amended to include additional detail to define the monitoring point locations for emissions to land. This is to ensure that the correct sampling point location is being utilised by the Licensee;
6. Condition 4.2.1 has been amended to address typographical errors and ensure accurate reporting against appropriate conditions of the Licence occurs, within the annual reports submitted.

As a result of an inspection undertaken at the Premises on 16 August 2017, it was identified that hydrocarbon and dust management conditions within the Licence, were not effectively addressing issues identified at the Premises. The Licence has therefore been amended to reflect additional changes or management requirements to ensure that operation of the Premises does not result in potential environmental harm, pollution or impact to human health.

The Delegated Officer considers these inclusions appropriate and in accordance with the requirements of the *Environmental Protection Act 1986* and subsidiary legislation. The following conditions have been included to reflect the above issues of concern:

1. Condition 1.3.6 has been amended to address issues of hydrocarbon management at the Premises as incorrect sampling locations were being used which could potentially result in harmful discharge of hydrocarbon contaminated waste water to the environment. In consultation with the Licensee, it was determined that the most appropriate approach to the control and monitoring of hydrocarbons from these areas, was to ensure they are defined within the Licence;
2. Condition 1.3.16 has been included within the Licence through this amendment process to address issues regarding dust and hydrocarbon emissions which have been identified during two separate inspection processes from 2016 and 2017 site inspections. This condition includes additional dust control and mitigation measures which are considered appropriate, as defined under section 62A (1)(q) of the *Environmental Protection Act 1986* and r.51(A) of the *Environmental Protection Regulations 1987*.

The Delegated Officer considers this approach appropriate and consistent with the regulatory controls applied by the Department, and in accordance with the DWER guidance shown within Appendix 1 of the Amendment Notice.

Amendment History

Table 5 provides the amendment history for L8846/2014/1.

Table 5: Licence amendments

Instrument	Issued	Amendment
L8846/2014/1	30/01/2018	Amendment Notice 1– Amendments to the Licence as a result of an Inspection undertaken in August 2017.

Licence Holder's Comments

The Licence Holder was provided with the draft Amendment Notice on 11/12/2017. An email was sent to the applicant on 8/1/2018 confirming that no comments had been received for consideration within the amendment process.

Amendment

1. Section 1. General, 1.1 Interpretation, is amended to reflect the new email contact details as shown by the insertion of the red text shown in italics below:

'CEO' *for the purpose of correspondence means;*

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@dwer.wa.gov.au

2. Condition 1.2.1(b) of the Licence is amended by the insertion of red text shown in italics below:

1.2.1 The Licensee shall operate and maintain:
(a) all bunds, concrete hard stands, oil/ water separators, sumps, stormwater culverts, gabions and dams to design specifications; and
(b) baghouses and associated filters, temperature probes and ambient air monitoring equipment (including monitoring probes, portable and static recording and monitoring devices) to the manufacturer's specification.

3. Condition 1.3.6 is amended by the insertion of the red text as shown in italics below:

1.3.6 The Licensee shall undertake the management action specified in Table 1.3.4 in the case of an event listed in Table 1.3.4.

Table 1.3.4: Management actions			
Emission point	***Event/ action reference***	***Event***	***Management action***
Incinerator (As per Schedule 1:	*EA1*	*Failure or malfunction or abnormal*	*1. Shut down incinerator.* *2. Restore normal operation of failed*

Maps)		*operation period (including emission of black smoke)*	*equipment or replace the failed equipment prior to re-introducing feed.* 3. *Assess temperature operation of chamber/s during failure, malfunction or abnormal operation period.* 4. *The Licensee must record the beginning and end of the Abnormal Operation period and any actions undertaken to rectify the issue.*
	EA2	*Start up*	1. *Must not load waste into the incinerator until preheat temperature of at least 1,000 ℃ is reached.*
Wash down bays; oil/ water separators	*EA3*	*Failure or malfunction or abnormal operation period resulting in elevated hydrocarbon sampling*	1. *Ensure no discharge of waste water is released from wash down bays by locking outflow pipe in 'closed' position or transferring contained waste water from the sump to an impermeable holding facility;* 2. *Assess and undertake maintenance or upgrades on the treatment process prior to reloading the system.* 3. *Transfer waste water back through the system and re-sample to ensure parameter limits are being achieved.* 4. *Once parameter sampling limits are achieved, treated waste water may be discharged from the wash down bay sump.*
Hydrocarbon contaminated storm-/ waste water from bunded facilities	*EA4*	*Hydrocarbon contaminated stormwater or spills within bunded structures*	1. *Remove all contaminated storm water held within bunds after each rainfall event, and process them through an oil/ water separator (or similar) or recycling facility.* 2. *Apply absorbency material to contain and remove hydrocarbon spills when they occur, and dispose of all contaminated materials appropriately.*

4. The Licence is amended by the insertion of Condition 1.3.16 as shown by the red text in italics below:

1.3.16 The Licensee must undertake an assessment of the following locations within the Premises boundary, and implement appropriate upgrades or repairs to mitigate dust emissions from these point sources:

Table 1.3.4: Management actions		
Emission points	***Event***	***Actions***
Wood screen, Crusher, Conveyor PS1, Rock Silos 11 – 14, Dust Silos 11-12	*Structural integrity assessment in the control and abatement of dust emissions.*	1. *Design and install equipment on the wood screen and crusher infrastructure (including associated conveyor) that will inhibit dust lift off into the environment.* 2. *Repair or replace roofing structures or side walls that are emitting dust on the rock and bagging silo's.* 3. *Submit a report to DWER that identifies what works will be undertaken and timeframes for their implementation*

and Bagging Dust Silo's 1-4 *(As per Schedule 1: Maps)*		*and completion, by no later than **28 February 2017**.*
Baghouse DRIBH05	*Replacement of damaged baghouse filter system due to fire*	*1. Replace and repair baghouse filter system in order to achieve compliance against condition 1.2.1 of the current Licence, by no later than **28 February 2018.*** *2. Submit a report to the CEO confirming testing and full operation of the baghouse filter system has been undertaken, in accordance with design and manufacturer's specifications, by **28 February 2018**.*

5. Condition 2.2.1, Table 2.2.1 has been amended as shown in red italics in the text below:

2.2.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1, and identified on the map of emission points in Schedule 1, it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emission points to air			
Emission point reference on Map of emission points	***Emission Point (Source)***	***Emission point height (m)***	***Source, including any abatement***
A1 - Dryer stack	*Rotary dryer no. 5 (KLN5)* *Rotary dryer no. 6 (KLN6)*	*36.2*	*Kiln via Cyclone cluster dryer no. 5 (CY01 & 02) and Cyclone cluster dryer no. 6 (CY03 & 04) to the baghouses (DRIBH05 & DRIBH06).*
A2 – Incinerator stack	*Incinerator stack*	*9.6*	*Hot Hearth 'HSH 100' incinerator stack placed on the secondary chamber discharge point.* *Incinerator with a minimum 2 second gas residence time in secondary chamber and incorporates a fully programmable logic control system for temperature control and load timer status (continuous).*

6. Condition 2.3.1, Table 2.3.1 has undergone an administrative change to define the monitoring point locations for the wash down bay and new laboratory, as shown in red italics in the text below:

2.3.1 The Licensee shall ensure that where waste is emitted to land from the emission points in Table 2.3.1, and identified on the map of emission points in Schedule 1, it is done so in accordance with the conditions of this Licence.

Table 2.3.1: Emissions to land			
Emission point reference	***Emission point reference on Map of emission points***	***Description***	***Source including abatement***
Outlet pipes from laboratory	*L1/ L4*	*Wastewater generated from laboratory testing of*	*Wastewater from laboratory sinks sent through buffering/ ~~three~~ stabilising tank~~s~~*

		product.	*~~including pH neutralising tank~~ and testing completed prior to release to ground.*
Outlet pipes from the workshops, wash down bay areas, storage areas and oil/ water separator.	*L2/ L3*	*Pipes removing wastewater from operations and workshop areas.*	*Wastewater discharged via fuel/oil traps/ separators or silt traps.*

7. Condition 3.3.1, Table 3.3.1 has undergone an administrative changes to define the update the monitoring point locations, as shown in red italics in the text below:

3.3 Monitoring of emissions to land

3.3.1 The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.

Table 3.3.1: Monitoring of emissions to land				
Emission point reference	***Monitoring point***	***Parameter***	***Units***	***Frequency***
Outlet pipes from the laboratory (L1/ L4)	*Buffer tank prior to discharge to holding tanks*	*pH*	*pH[1]*	*~~Quarterly~~ Monthly*
Outlet pipes from the workshops, wash down bays, oil/ water separator (L2/ L3)	*Circulation exit point into the wash down bay sump*	*Total Recoverable Hydrocarbons (TRH)*	*mg/L*	*Monthly*

Note 1: In-situ non-NATA monitoring permitted

8. Condition 4.2.1, Table 4.2.1, has undergone administrative changes due to typographical errors and as a result of inclusion of additional conditions within this amendment process. The administrative changes are defined by the red italics and strike through text, as shown below:

4.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 63 calendar days after the end of the annual period (i.e. 1 September). The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

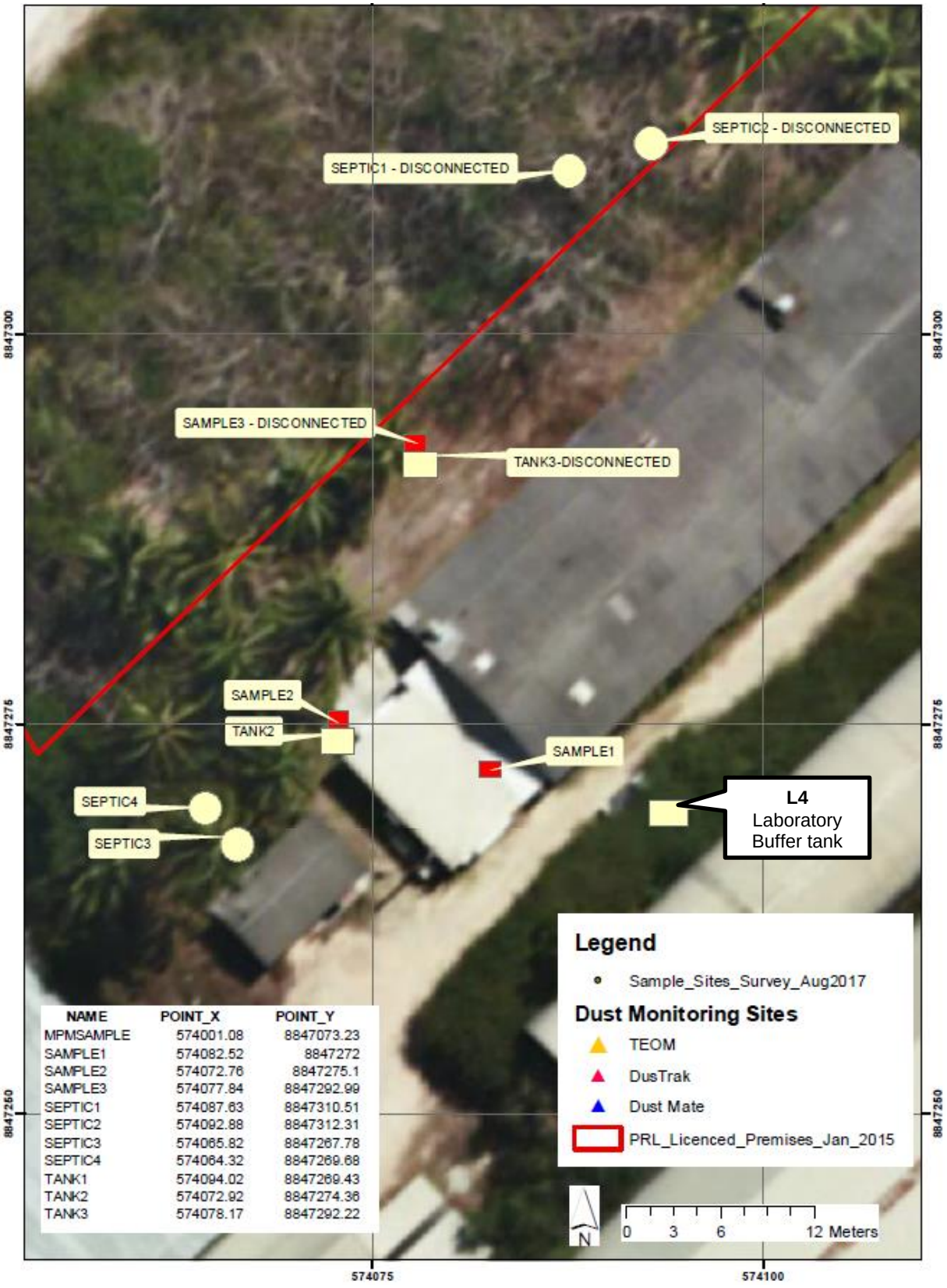
Table 4.2.1: Annual Environmental Report		
Condition or table (if relevant)	***Parameter***	***Format or form[1]***
-	*Summary of project operation, any changes to site boundaries and Premises map.*	*None specified*
-	*Summary of measures taken to suppress and manage dust emissions*	*None specified*
-	*Summary of performance of all stormwater features and any actions undertaken to rectify concerns identified and including management, monitoring and measurement against the performance criteria within the Stormwater Management Plan.*	*None specified*
-	*Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action/s taken.*	*None specified*
-	*Explanation of the monitoring results for all monitoring parameters*	*None specified*
1.3.6 & 1.3.7	*Summary of any management actions undertaken as a result of malfunction, failure or abnormal operation ~~of the~~*	*None specified*

	~~*incinerator.*~~	
1.3.8	*Confirmation of sulphur content of fuels used in rotary dryer/s.*	*None specified*
1.3.9	*Summary of baghouse pressure monitor failures and action/s taken.*	*None specified*
3.1.3	*Summary of annual equipment calibration*	*None specified*
3.6.1	*Annual analysis of incinerator monitoring data*	*None specified*
Table 3.2.1	*Monitoring of point source emissions to air*	*None specified*
Table 3.3.1	*Monitoring emissions to land*	*LR1*
Table 3.4.1	*Summary of monthly inputs/ outputs*	*None specified*
Table 3.5.1	*Monitoring of ambient air quality*	*AR1*
Table 3.7.1	*Summary of meteorological monitoring*	*None specified*
4.1.~~3~~2	*Compliance*	*None specified*
4.1.~~4~~3	*Complaints summary*	*None specified*
4.1.~~5~~4	*Spillage summary*	*None specified*
4.3.1	*Summary of limit exceedences*	*None specified*

Note 1: Forms are in Schedule 2

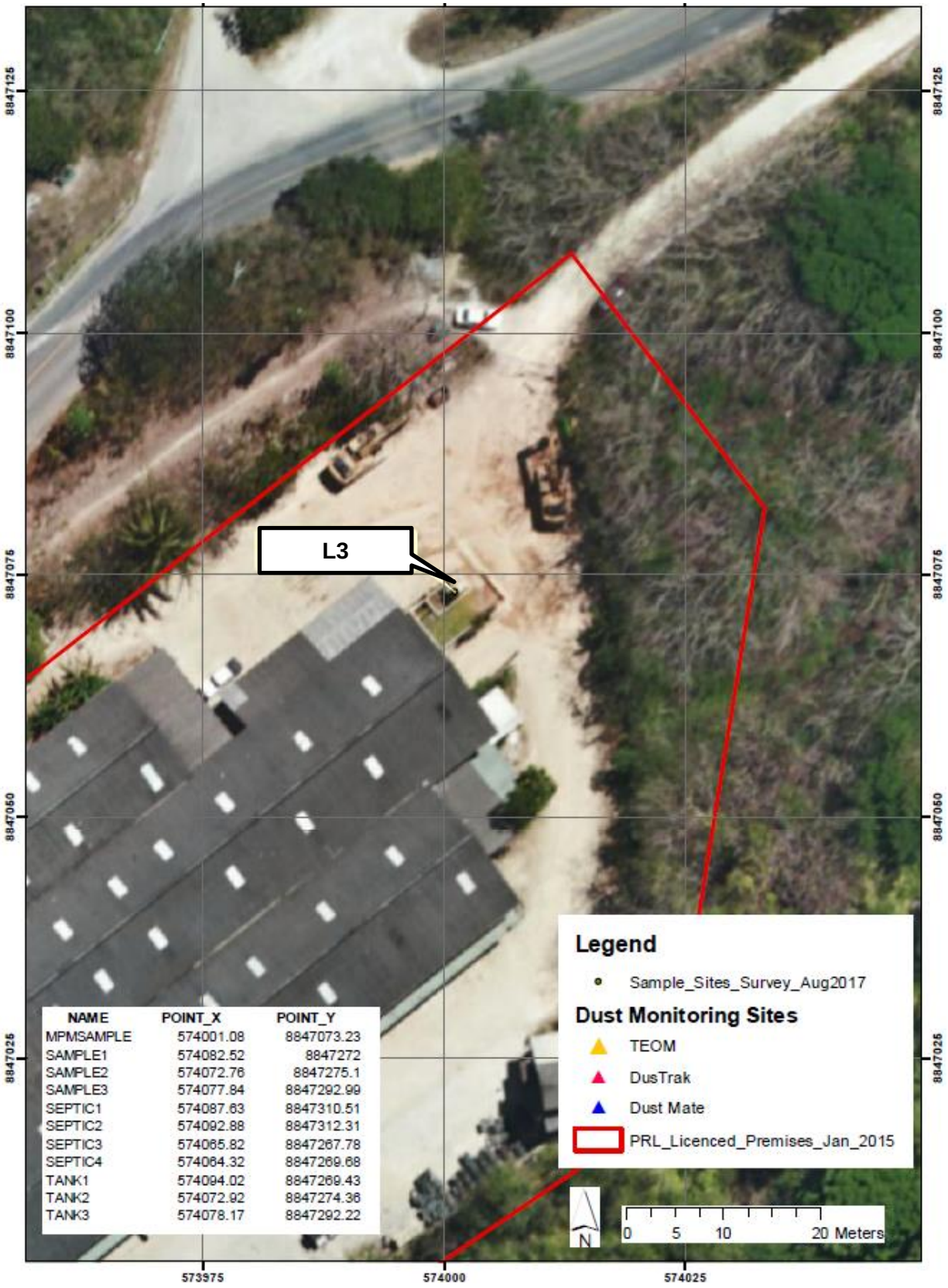
9. Schedule 1: Maps has additional map included which shows the location and monitoring point references for monitoring of emissions to land, as shown below:

Schedule 1: Map of emission points to land from laboratory



NAME	POINT_X	POINT_Y
MPMSAMPLE	574001.08	8847073.23
SAMPLE1	574082.52	8847272
SAMPLE2	574072.76	8847275.1
SAMPLE3	574077.84	8847292.99
SEPTIC1	574087.63	8847310.51
SEPTIC2	574092.88	8847312.31
SEPTIC3	574065.82	8847267.78
SEPTIC4	574064.32	8847269.68
TANK1	574094.02	8847269.43
TANK2	574072.92	8847274.36
TANK3	574078.17	8847292.22

Schedule 1: Map of emission points to land from the workshop wash down bay area



NAME	POINT_X	POINT_Y
MPMSAMPLE	574001.08	8847073.23
SAMPLE1	574082.52	8847272
SAMPLE2	574072.76	8847275.1
SAMPLE3	574077.84	8847292.99
SEPTIC1	574087.63	8847310.51
SEPTIC2	574092.88	8847312.31
SEPTIC3	574065.82	8847267.78
SEPTIC4	574064.32	8847269.68
TANK1	574094.02	8847269.43
TANK2	574072.92	8847274.36
TANK3	574078.17	8847292.22

Appendix 1: Key Documents

	Document Title	In text ref	Availability
1	DER, July 2015. *Guidance Statement: Regulatory principles.* Department of Environment Regulation, Perth.	DER2014/001365	accessed at http://www.dwer.wa.gov.au
2	DER, August 2016. *Guidance Statement: Licence duration.* Department of Environment Regulation, Perth.	N/A	
3	DER, February 2017. *Guidance Statement: Risk Assessments*. Department of Environment Regulation, Perth.	N/A	
4	DER, February 2017. *Guidance Statement: Decision Making*. Department of Environment Regulation, Perth.	DER2015/001284	
5	DER, February 2017. *Guidance Statement: Land Use Planning.* Department of Environment Regulation, Perth.	DER2014/003028	
6	Email: Prescribed premises plans. Received from Joy Wickenden on 11/09/2017.	-	DWER records (A1539226)
7	Email: Proposed Amendment to Licence L8846/2014/1 – Ref: DER2014/002338. Sent by Joy Wickenden, Senior Environment Advisor, Christmas Island Phosphates.	24/01/2018	DWER records (A1603178)
8	Email: FW: Proposed Amendment to Licence L8846/2014/1 – Ref: DER2014/002338. Sent by Joy Wickenden, Senior Environment Advisor, Christmas Island Phosphates.	30/01/2018	DWER records (A1603480)

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 11/12/2017 for review and comment. An extension on the response date for comments was requested until 25 January 2018. The following comments were submitted on the draft Amendment Notice.

Comments received	DWER consideration of risk
Condition 1.3.6: Wash-down bays; oil/water separators —EA3 • Part 3/4 - Due to the limited testing ability on Christmas Island all sampled are sent to the mainland for analysis. This requires a 7-10-day turnaround for results. During this period, we are unable to shut down the area due to ongoing operational requirements as it is the only facility of its type within CIP Operations. CIP propose that we purchase a FCI Environmental Petroscan Portable PHI-100/PHA-100 Hydrocarbon Analyzer to test the water prior to discharge to ensure that the TRH levels are within the required parameters.	DWER considers that due to the high variability of hydrocarbons, other potential contaminants and waste water volumes into the oil/ water separator, monitoring monthly is a minimum requirement for consideration of the sensitivity of the receiving environment and potential impacts to flora or fauna. The proposed use of the portable TRH scanner would have to demonstrate its suitability to the type of environment proposed for use and the variability of hydrocarbons (type/ volume/ ease of calibration) used within the wash down bay, prior to implementation. This has not been supplied for review. In the event that waste water proposed for discharge from the sump does not meet 10 ppm, it must be held within an impermeable containment infrastructure until such time that it does (as per Table 1.3.4, row 3, point 1). DWER considers that the proposed monitoring frequency and management actions are appropriate and consistent with premises across the State. No change is proposed to the condition.
Condition 1.3.16: Table 1.3.4 – Management actions - Wood screen, crusher, conveyor PS1, Rock Silos 11-14, Dust Silos 11-12 and Bagging Dust Silos 1-4 (As per schedule 1: Maps). Naming of Silos incorrect. Naming as follows: • Dryers/CC: · Rock Silos 5-8 · Dust Silos 3-4 • Downhill: · Rock Silos 1-4 · Dust Silos 1-2 • Shiploading: · Dust Silos 1-4 • Part 3 - please extend the reporting date to the 28.02.2018	The request to amend the naming conventions of the rock and dust silo's was retracted by the Licensee, Joy Wickenden via email, on 30 January 2018. No further action required. Condition amended to reflect the reporting date as 28/02/2018.
Condition 1.3.16: Table 1.3.4 - Management actions - Baghouse DRIBH05 - Replacement of damaged baghouse filter system due to fire: • Part 2 - please extend the reporting date to 28.02.2018	Condition amended to reflect the reporting date as 28/02/2018.
Condition 3.3.1: Table 3.3.1 - Monitoring Emissions to Land: • Laboratory outlet pipes in Table 2.3.2 monitoring is required	DWER notes the typographical error in Table 3.3.1 of the existing Licence does not reflect the monitoring frequency as stipulated in Table

monthly can Table 3.3.1 be edited so that the sampling requirements are mirrored.	2.3.2 of the existing Licence. The monitoring frequency for the laboratory outlet pipes has now been amended to align with Table 2.3.2 of the existing Licence to reflect 'monthly' not 'quarterly' as previously stated, in Table 3.3.1.