



## Application for Licence Amendment

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

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<b>Licence Number</b>	L5245/1967/14
<b>Licence holder</b>	Alcoa of Australia Limited
<b>ACN</b>	004 879 298
<b>File number</b>	2010/007402-3
<b>Premises</b>	Kwinana Alumina Refinery Hogg Road NAVAL BASE WA 6167
<b>Date of report</b>	29/04/2024
<b>Decision</b>	Revised licence granted

## Table of Contents

<b>1. Decision summary</b>	<b>3</b>
<b>2. Scope of assessment</b>	<b>3</b>
2.1 Regulatory framework	3
2.2 Application summary	3
2.2.1 Evaporators	3
<b>3. Risk assessment</b>	<b>4</b>
3.1 Source-pathways and receptors	4
3.1.1 Emissions and controls	4
3.1.2 Receptors	6
3.2 Risk ratings	7
<b>4. Consultation</b>	<b>11</b>
<b>5. Decision</b>	<b>11</b>
5.1 Summary of amendments	11
<b>6. Conclusion</b>	<b>12</b>
<b>References</b>	<b>12</b>
<b>Appendix 1: Summary of licence holder’s comments on risk assessment and draft conditions</b>	<b>13</b>
Table 1: Licence holder controls	4
Table 2: Sensitive human and environmental receptors and distance from prescribed activity	6
Table 3: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation	8
Table 4: Summary of licence amendments	11

## 1. Decision summary

Licence L5245/1967/14 is held by Alcoa of Australia (Alcoa; licence holder) for the Kwinana Alumina Refinery (the premises), located at Naval Base, WA 6167.

This decision report documents the assessment of potential risks to the environment and public health from the proposal to install 15 evaporators on the run-off water storage (ROWS) pond and six land-based evaporators on residue storage area K (RSA K) at the premises. As a result of this assessment, revised licence L5245/1967/14 has been granted.

The revised licence issued as a result of this amendment superseded the existing licence previously granted in relation to the premises. The revised licence has been granted with existing conditions being transferred, but not reassessed.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) has considered and given due regard to its regulatory framework and relevant policy documents which are available at [DWER Regulatory documents | Western Australian Government \(www.wa.gov.au\)](https://www.wa.gov.au/government/department-of-water-and-environmental-regulation/regulatory-framework).

### 2.2 Application summary

On 1 February 2024 the Alcoa submitted an application to the department to amend licence L5245/1967/14 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). Alcoa is seeking an amendment to:

- install and operate 15 evaporator units on the ROWS pond;
- install and operate six land-based evaporator units on RSA K; and
- extend the expiry date of the licence by two years.

The licence holder notified the department on 9 January 2024 of their plan to curtail production at the Kwinana Alumina Refinery beginning in the second quarter of 2024. The planned curtailment of production at the premises will result in a surplus of process water, and the evaporator units on the ROWS pond and RSA K are proposed to manage water storage capacity at the premises in the short-term (Alcoa 2024a).

Alcoa has stated in the application that they will continue to manage the premises including the alumina refinery and residue storage areas over the longer term, and this application relates only to an immediate need to address the positive water balance at the premises and to extend the duration of the licence while the premises undergoes curtailment activities.

#### 2.2.1 Evaporators

The ROWS pond holds runoff water from the Residue Storage Area (RSA) and water from groundwater recovery bores that is characteristically alkaline (Rockwater 2023). The licence holder currently utilises water from the ROWS pond for dust suppression in the RSA sprinkler network, and to direct water to the cooling pond to stabilise water levels if required.

##### Evaporators on the ROWS pond

The proposed 15 evaporator units on the ROWS pond will consist of a submersible pump in the ROWS pond which pumps to two back to back bars of misting nozzles and fans. The licence holder stated that the maximum evaporation rate per evaporator unit is approximately 14.6 kL/h when assuming an availability rate of 75% (Alcoa 2024b). The licence holder is proposing to operate the evaporators on

the ROWS pond up to 24 hours per day, 7 days per week. and the addition of the 15 evaporator units is expected to increase evaporation by up to 1,916,000 kL per year (Alcoa 2024b).

### Evaporators on RSA K

The proposed six land-based evaporator units on RSA K will also receive water from the ROWS pond, and will be installed to direct spray over RSA K. The licence holder stated that the maximum evaporation rate per evaporator unit is 49 kL/h, and the licence holder is proposing to operate the evaporators on RSA K approximately 10 hours per day (Alcoa 2024a).

The addition of the proposed evaporators on RSA K is expected to increase the saturation levels on RSA K from any additional water that does not evaporate and that infiltrates the RSA. The licence holder has provided a stability assessment (KCB 2024) which notes that current stability and seepage models for RSA K assume it is saturated, and the use of land-based evaporators is not expected to deviate from the stability assumptions (KCB 2024). The assessment also concluded that RSA K has the ability to accommodate the operational flows from the land-based evaporators (KCB 2024).

The existing licence (L5245/1967/14) does not specify conditions related to the design stability of the residue storage area, however the delegated officer notes that in this application the licence holder has proposed to continue to monitor the phreatic response within the embankment of RSA K using an established vibrating wire piezometer network (Alcoa 2024a). The licence holder has proposed to continue to implement the RSA K Trigger Action Response Plan that defines trigger levels according to pore pressures (kPa) and elevation of the phreatic surface (RL(m)) above each vibrating wire piezometer.

## 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

### 3.1 Source-pathways and receptors

#### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during construction and operation of the proposed evaporators at the premises which have been considered in this decision 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: Licence holder controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Dust	Installation of 15 x evaporator units on ROWS pond	Air / windborne pathway	<ul style="list-style-type: none"> <li>Speed limits are in place to minimise dust generations from vehicle movement.</li> <li>Dust will be managed in accordance with Alcoa’s existing dust suppression methods.</li> </ul>
Noise	Installation of		<ul style="list-style-type: none"> <li>Noise generating construction works will be conducted between the hours of 0700 and 1900 Monday to</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
	6 x land based evaporator units on RSA K		<p>Saturday, excluding public holidays.</p> <ul style="list-style-type: none"> <li>• Vehicles, machinery and equipment installed with standard noise control devices and to be checked for compliance prior to use on site.</li> <li>• Operate heavy vehicles, light vehicles, equipment and machinery in accordance with manufacturer's guidance to minimise noise emissions.</li> <li>• Speed limits are in place onsite to reduce engine noise emissions.</li> </ul>
<b>Operation (including commissioning)</b>			
Noise	15 x evaporators operating on ROWS pond	Air / windborne pathway	<ul style="list-style-type: none"> <li>• Evaporators will be located on the ROWS pond which is typically below ground level and not located close to potential sensitive receptors.</li> <li>• Evaporators will be incorporated in Alcoa's existing equipment maintenance program.</li> <li>• The sound power level of the evaporators are 102db(a) per unit and they are not expected to be a dominant noise source.</li> </ul>
Spray drift of water containing contaminants including metals		Air and wind dispersion	<ul style="list-style-type: none"> <li>• The evaporators will be located centrally in the ROWS pond.</li> <li>• During normal operating conditions, the evaporators will be set to 6-12m below adjacent operational areas. Spray height from the evaporators will therefore typically not exceed 10m.</li> <li>• Alcoa will undertake two months of commissioning of the evaporators during which time monitoring of spray drift will occur to enable accurate wind speed and direction control criteria to be established for the evaporator modules.</li> <li>• The evaporators will be managed through a control system linked to an onsite weather monitoring station. The control system will allow for automated control of the evaporators depending on climatic conditions, including wind speed, wind direction and humidity.</li> <li>• The control system will ensure that spray drift from the evaporators is managed within the boundary of the ROWS pond.</li> <li>• Routine visual monitoring will occur of spray drift extent.</li> </ul>
Noise	6 x evaporators operating on RSA K	Air / windborne pathway	<ul style="list-style-type: none"> <li>• Evaporators will be incorporated in Alcoa's existing equipment maintenance program.</li> <li>• The sound power level of the evaporators are 102 db(a) per unit and they are not expected to be a dominant noise source.</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
Spray drift of water containing contaminants including metals		Air and wind dispersion	<ul style="list-style-type: none"> <li>• The evaporators will typically operate over a 180-degree arc and will only operate when the wind supports the operational arc.</li> <li>• Alcoa will undertake two months of commissioning of the evaporators during which time monitoring of spray drift will occur to enable accurate wind speed and direction control criteria are established for the evaporator modules.</li> <li>• The evaporator units will be equipped with a control system which allows automatic responses to weather conditions.</li> <li>• The control system will ensure that spray drift from the evaporators is managed to fall onto the RSA surface.</li> <li>• Any water from the evaporators that is not evaporated will be captured by the existing decant or underdrainage controls on RSA K and directed to Surge Pond J (as existing supernatant liquor from mud or sand residue deposition is managed).</li> <li>• Routine visual monitoring will occur of spray drift extent.</li> </ul>

### 3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the employees, visitors, and contractors of the licence holder's 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: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
<u>Rural residential premises</u>	
Clementi Road	~1.5km to the east of the ROWS pond ~1.7km to the south east of RSA K
Abercrombie Road	~750m to the west of the ROWS pond ~1.3km to the south west of RSA K
Mandogalup Road	~2.25km to the north of the ROWS pond ~1.3km to the north east of RSA K
Residential premises (below Thomas Road)	~2km to the south of the ROWS pond ~3km to the south of RSA K
Environmental receptors	Distance from prescribed activity

<p><u>Wetlands</u></p> <p>Spectacles Swamp (Important wetlands, nationally significant wetlands identified in <i>A directory of important wetlands in Australia</i>)</p> <p>Mandogalup Swamp south (multiple use category wetland)</p> <p>Long swamp (conservation category wetland)</p>	<p>~1 km south east of the ROWS pond ~1.8 km south east of RSA K</p> <p>~1.5 km to the east of the ROWS pond ~1.7km to the south east of RSA K</p> <p>~1.2 km to the north west of the ROWS pond ~1.2km to the west of RSA K</p>
<p>Bush forever area &amp; Green growth</p>	<p>From ~580 m to the east of the ROWS pond From ~1.5km to the east of RSA K</p>
<p>TECs</p> <p>Green growth TEC site commitments – endangered -endangered and critically endangered, priority 3</p>	<p>From ~ 200m to the south west of the ROWS pond</p> <p>Immediately south of the ROWS pond From ~200m to the east of RSA K</p>

### 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emissions sources which are proposed to change and take 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 revised licence L5245/1967/14 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. operation of the evaporators on the ROWS pond and RSA K.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 3: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation**

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
<b>Construction</b>								
Installation of Motor control center, transformer, cabling, concrete anchor blocks and 15 x evaporation units on the ROWS pond	Dust	Air/windborne pathway causing impacts to health and amenity	Residences from 750m west of the proposed activity	Refer to Section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Existing condition A9	The delegated officer does not expect noise and dust emissions associated with the installation of the evaporators on the ROWS pond and on RSA K to impact on sensitive receptors, taking into consideration the application's proposed noise and dust controls for equipment, the proposed hours of construction and the distance to the nearest residential receptors. The licence includes existing dust monitoring requirements (A9) in proximity to the RSA where the works will occur and requirements of the provisions of the Environmental Protection (Noise) Regulations 1997 are also applicable.
	Noise				C = Minor L = Rare <b>Low Risk</b>			
Installation of 30kL breakout tank, high pressure pump set, electrical power and control infrastructure, 500 kVa generator, 4,500 L diesel storage tank and 6 x evaporation units on RSA K	Dust		Residences from 1.3 km north and south west of the proposed activity		C = Minor L = Rare <b>Low Risk</b>			
	Noise				C = Minor L = Rare <b>Low Risk</b>			
<b>Commissioning and operation</b>								
15 x evaporators operating on ROWS pond	Noise	Air/windborne pathway causing impacts to health and amenity	Residences from 750m west of the proposed activity	Refer to Section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Condition W15	The licence holder provided the sound power level of the proposed water and land-based evaporators (102 db(a) per unit) and stated that the evaporators are not a dominant noise source at the facility.  Based on the expected sound power levels of the equipment and the existing noise profile of the premises



Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
6 x evaporators on RSA K			Residences from 1.3 km north and south west of the proposed activity				the delegated officer considers that the addition of the proposed evaporators will not contribute to any exceedance of assigned noise levels (including for night-operations) and noise from the proposed evaporator units is not expected to significantly contribute to the cumulative noise levels from the premises. The delegated officer therefore determined not to impose any additional controls related to noise in this licence amendment.	
15 x evaporators operating on ROWS pond	Spray drift of alkaline process water containing contaminants including metals	Air and wind dispersion to nearby native vegetation causing decline in vegetation health	TECs immediately bordering the south of the proposed activity	Refer to Section 3.1	C = Major L = Unlikely <b>Medium Risk</b>	Y	Condition W15 -W21 <b>W22</b>	Due to the proximity of TECs to the ROWS pond and RSA K where the evaporators will be located, and the possible risk of vegetation health impacts posed by contaminated process water, the delegated officer considers it necessary to prevent any spray drift from occurring.
6 x evaporators on RSA K			TECs to the west of the proposed activity					The delegated officer has therefore determined to impose the licence holder's proposed controls as conditions on the licence, including the following proposed controls:  -the evaporators will be installed with automated controls linked to a meteorological monitoring unit;  -the evaporators will operate such that there will be no spray drift outside the embankments of the ROWS pond or RSA; and  -licence holder will undertake visual inspections of the ROWS pond and RSA K.  The delegated officer has also determined to impose conditions related to reporting and notification to the department to ensure the evaporators are installed in the manner proposed by the licence holder, that the proposed automated controls which are essential to prevent spray drift to receptors are operating as intended, and that the department is made aware of any instances of spray drift occurring contrary to the specified operational requirements.

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Storage of diesel	Leaks/spills of hydrocarbons	Direct discharge to ground	Soil on the premises	N/A	C = Minor L = Unlikely <b>Medium Risk</b>	N	<b><u>Condition W15, Table 16</u></b>	The licence holder has specified that the diesel storage tank will be installed within the boundary of the RSA K facility which is lined with a composite liner to provide containment in the event of a leak or spill of diesel from the storage tank. The delegated officer considers this to be suitable containment and has conditioned the location of the diesel storage tank within the composite lined area as an installation requirement (Table 16).  The general provisions of the <i>Environmental Protection Act 1986</i> and Environmental Protection (Unauthorised Discharges) Regulations 2004 apply during operations.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

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

## 4. Consultation

The licence holder was provided with a draft of the amended licence and this decisions report for comment on 11 April 2024. Refer to Appendix 1 for a summary of the licence holder's comments on the draft amendment and the department's response.

## 5. Decision

The delegated officer has determined that the proposal to install, commission and operate 15 evaporators on the ROWS pond and six land-based evaporators on RSA K at the Kwinana Alumina Refinery does not pose an unacceptable risk of impacts to vegetation on site, as well as off-site receptors. The delegated officer considered the proposed controls from the licence holder and determined the following will be imposed on the amended licence:

- the evaporators will be installed with an automatic control system to allow the evaporators to operate according to onsite weather conditions;
- all spray from the evaporators will be contained to the ROWS pond and RSA; and
- visual inspections will be undertaken to ensure that the evaporators are operating as intended.

In addition to the licence holder's proposed controls, the delegated officer has determined to impose on the licence:

- reporting conditions related to the installation and operation of the evaporators;
- a notification condition for assurance that the department is alerted if the evaporators are not operating in the manner proposed by the licence holder; and
- installation requirements for the diesel storage tank.

The delegated officer notes that as the proposed installation and operation of the evaporators are incorporated as a licence amendment on licence L5245/1967/14, the delegated officer may determine to remove conditions in future licence amendments once they are obsolete (including once the Environmental Compliance Report and commissioning report have been submitted) or impose additional controls if there are deemed to be any changes to the assessed risk profile of the evaporators.

As discussed in section 2.2.1, the delegated officer noted the licence holder's proposed continued piezometer monitoring of RSA K for embankment stability and the stability assessment provided by the licence holder (KCB 2024) and did not determine to assess the geotechnical stability of RSA K in this risk assessment as it is beyond the scope of the application.

The delegated officer also determined to extend the expiry of licence L5245/1967/14 given the licence holder is proposing to curtail production and transition to a care and maintenance state, therefore a licence renewal process to assess whether the environmental impact of the premises has materially altered from when it was assessed is not required at this point in time. The delegated officer notes that the licence will need to reflect the current state of the premises, and therefore a subsequent licence amendment may be required to ensure the currency of the licence when entering a state of care and maintenance.

### 5.1 Summary of amendments

Table 4 provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the amended licence.

#### **Table 4: Summary of licence amendments**

Condition no.	Description
Cover page	Expiry date extended to 2 September 2026.
Licence history	Included description for this amendment.
Definitions	Definition for ROWS pond added.
W15 & Table 16	New condition to authorise installation of the evaporators and specify location of diesel storage tank.
W16	New condition to require submission of an Environmental Compliance Report following the installation of the evaporators.
W17 and W18	New conditions preventing operation until an Environmental Compliance Report is submitted and specifying operational requirements for the evaporators, that evaporators must operate with an automated control system linked to meteorological monitoring unit and in a manner that does not result in spray drift outside the embankments of the ROWS pond or RSA.
W19	New condition requiring that the licence holder submit a report within 90 days of the evaporators commencing operating that summarises control criteria, performance and compliance against operations requirements.
W20 & Table 18	New condition requiring visual inspections of the ROWS pond, RSA and evaporators to check for spray drift.
W21	New condition requiring written logs of visual inspections.
W22	New condition to require reporting of any incidents where spray drift occurs (i.e. condition W18 not met) and proposed actions to address the non-compliance.

## 6. Conclusion

Based on the assessment in this decision 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.

## References

1. Alcoa of Australia (Alcoa) 2024a, *Kwinana Alumina Refinery Licence Amendment Application Supplementary Information – RSA K Evaporators*, Applecross, Western Australia.
2. Alcoa of Australia (Alcoa) 2024b, *Kwinana Alumina Refinery ROWS Pond Evaporators – Licence Amendment Supporting Document*, Applecross Western Australia.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
6. Klohn Crippen Berger (KCB) 2024, *Kwinana Residue Storage Areas Dam Safety Impact of Land-Based Evaporators Used on RSAs*.
7. Rockwater 2023, *Kwinana Alumina Refinery and Residue Storage Areas: Review of Borefield Performance and Groundwater Quality in 2022*, Jolimont, Western Australia.

## Appendix 1: Summary of licence holder’s comments on risk assessment and draft conditions

Condition	Summary of licence holder’s comment	Department’s response
W15	<p><b><u>Concrete bunding</u></b> The diesel storage tank will be installed within the RSA K facility which is lined with a composite liner which will provide full containment in the event of inadvertent release of diesel from the storage tank. Additional concrete bund containment is not considered warranted and the licence holder proposes removing this requirement.</p>	The department accepts this change as it will not increase the assessed risk.
W18	<p><b><u>Meteorological monitoring units</u></b> The automated controllers for the evaporators are linked to standalone meteorological monitoring units located on RSA K and the ROWS pond, rather than existing premises meteorological monitoring station and therefore the licence holder proposes changing the wording of condition W18 to reflect this.</p>	The department accepts this clarification.
	<p><b><u>Automated controller</u></b> The licence holder requests that the department update the wording of condition W18 to allow the evaporators to operate without the automated controller in the event of maintenance, set-up and/or testing.</p>	The department accepts this change as under the scenarios described the licence holder may need to temporarily operate the evaporators without the automated controller. The delegated officer notes that it would be expected that the licence holder keeps adequate records in the event of maintenance, set-up and testing to demonstrate the rare occurrences under which it is impractical to implement the specified operational requirement.
	<p><b><u>Spray drift to TECs</u></b> The licence holder requests that the W18 condition wording is changed to prevent impacts from overspray to TECs rather than to prevent spray drift from the RSA K and the ROWS pond. The licence holder also requests the term “overspray” is used instead of “spray drift” in the licence.</p>	<p>The department notes the inconsistency in the reference to ‘spray drift’ in the licence and ‘overspray’ in the decision report risk table, and instead of updating the licence to ‘overspray’ has edited the decision report to ensure the term spray drift is used consistently throughout.</p> <p>As per the department’s <i>Guidance Statement: Setting Conditions</i> (DER 2015) the delegated officer determined that the requirement to contain spray drift was risk-based and enforceable. The department does not accept the licence holder’s proposed change to ‘prevent impacts from overspray to TECs’ as it is not sufficiently clear on how impacts would be measured or enforced.</p> <p>The delegated officer determined in the risk assessment that any spray drift was not acceptable and determined to prevent spray drift from occurring rather than awaiting possible signs of impact to TECs.</p>

Condition	Summary of licence holder's comment	Department's response
		The licence holder specified that evaporator control systems will ensure that spray drift from the evaporators will be managed within the boundary of the ROWS pond and to fall on the surface of the RSA, and the delegated officer determined to apply the proposed control as a condition on the licence. The department notes that the licence holder stated that the spray drift will be managed to fall onto the RSA surface and had not specified RSA K only, and condition W18 has been updated to reflect this clarification.
W21	<p><b><u>Signature on inspections</u></b> The licence holder requests condition W21 is updated to remove the requirement for a signature as the internal system does not have this functionality while still logging the person who conducted the inspection to meet the intent of the original condition.</p>	The department accepts this change as it will not increase the assessed risk.
	<p><b><u>Frequency of inspection</u></b> The licence holder requests to reduce the frequency of inspection from every 6 hours when operating, to every 6 hours during the day shift whilst commissioning and daily while operational.</p> <p>The licence holder states that daylight hours are required for effective visual inspections, and during commissioning they propose to conduct one visual inspection in the morning when easterly winds are prevalent and in the afternoon when south-westerly winds are dominant. The licence holder states that the reduction to once daily while operational is suitable as after commissioning the risk from the commissioned units is reduced as the site specific operating parameters will have been developed and implemented via the automated controllers.</p>	The department accepts this change.
W22	<p><b><u>CEO notification</u></b> The licence holder requests that condition W22 is changed from notifying the CEO within 24 hours to as soon as practicable when becoming aware of any non-compliances with the evaporator operational requirements (W18)</p>	The department notes the licence holder's comment that the requirement to notify the department within 24 hours is impractical and has updated the condition to require notification within 7 days. This is in line with the department's approach to condition setting as it is clear on what is expected from the licence holder (DER 2015).
	As in condition W18 the licence holder also stated they request the term "overspray" is used instead of "spray drift" and noted a condition reference error to W17 rather than W18.	As noted above, the decision report has been changed to be consistent with the licence and the term 'spray drift' is used throughout.  The incorrect condition reference was corrected.