



Application for Licence Amendment

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

Licence Number	L6453/1990/12
Licence Holder	BHP Nickel West Pty Ltd
ACN	004 184 598
File Number	2011/009443-1
Premises	Mt Keith Operations WILUNA WA 6646 Mining tenements: M36/183, M36/184, M36/185, M36/246, M36/286, M36/288, M36/399, M36/422, M36/294, M36/467, M36/658, M36/677, M53/56, M53/57, M53/165, M53/166, M53/167, M53/208, M53/215, M53/216, M53/217, M53/218, M53/327, M53/328 and M53/489. General purpose leases: G53/11, G53/12, G53/13, and G53/14. Miscellaneous licence L36/206.
Date of Report	28 November 2024
Decision	Revised licence granted

Manager, Resource Industries

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

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1. Decision summary

Licence L6453/1990/12 is held by BHP Nickel West Pty Ltd (Licence Holder) for the Mt Keith Operations (the Premises), located in Wiluna, Western Australia.

This Amendment 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 L6453/1990/12 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary and overview of premises

The Licence Holder owns and operates the Mt Keith Nickel mine, located approximately 460 kilometres (km) north of Kalgoorlie, Western Australia. Licence L6453/1990/12 (L6453) for Mt Keith Nickel Operations (MKO) is granted under Part V of the *Environmental Protection Act 1986* (WA) (EP Act).

On 12 June 2024 the Licence Holder submitted an application to the department to amend Licence L6453/1990/12 under section 59 and 59B of the EP Act.

The licence holder is requesting an amendment to L6453/1990/12 to allow for discharge of excess storm water, under extreme weather conditions, from the Water Storage Area (WSA) of the Central Discharge Tailings Storage Facility (CDTSF) to J Stage Pit.

Two large rainfall events occurred at MKO, in relatively quick succession, with 118mm received over a two-day period from 25/01/2024 to 26/01/2024 and an additional 84.8mm received over a 6 hour period on 09/03/2024. In total, MKO has had ~253.6mm of rainfall since the first event in January 2024, with an additional 50.8mm received in March. The WSA is designed to accommodate a single 1% AEP rain event of ~202mm and likely contingency storage allowances, with the rainfall received since the first event in January equal to 125.5% of the 1% AEP rainfall volume.

The remaining capacity within the WSA was assessed and a combination of small duration plausible rainfall events (63.2% AEP) with a total rainfall depth of >60mm would, at that time, be sufficient to fill the WSA up to the spillway elevation and potentially resulting in uncontrolled discharge to the surrounding environment. To prevent an uncontrolled discharge to the environment the Licence Holder is requesting approval to discharge excess water from WSA to J Stage Pit. Figure 1 provides an overview of premise boundary and WAS and J pit discharge location.

Additional administrative amendments have also been requested, these are:

- Amend reference to Decant Water Pond to Return Water Pond
- Update Figure 1: Map of the boundary of the prescribed premises
- Update Figure 2: Map of ambient monitoring locations
- Update Figure 4: Mt Keith nickel mine infrastructure and emission locations; and

- Update Figure 6: Bulk storage containment locations

2.2.1 Existing Water Storage Area

The existing MKO tailings transfer and storage facility is designed to transfer tailings slurry from the concentrator tailings disposal system to the tailings storage area at a production rate of between 10 and 15 million tonnes per year (Mt/y). The tailings are pumped from the processing plant via a HDPE overland pipe to the tailings booster station where it can then be pumped to either one of the 7 perimeter risers (3 out of the 4 east risers, one decommissioned, and 4 west risers) or a central riser.

The CDTSF, which is nearly circular, is about 4.6 km in diameter and due to a continual raising of the embankment walls the storage capacity is constantly increasing. As such the final dam design is expected to hold 481Mt by 2040. Tailings are deposited at approximately 40% solids by weight (between 35% and 47%) and the CDTSF works by allowing the solids to settle out of the slurry leaving 'clear' water to run to the WSA.

The CDTSF has its highest point on the western perimeter. From west to east, the height of the area drops naturally by approximately 12.5 m over the 4.6 km length. This gives a slope of 0.27%, which is utilised in transporting water off the dam (via decant pipes located in the tailings embankment) and around to the WSA. The WSA is large enough to store 3.5 million cubic metres (Mm³) of water. This capacity is enough to contain the storm water from a 1:100 year 72 hour storm event, in addition to process outflows. Water is then returned back to the plant with the use of two decant pumps into a return water pond then reused in the plant. Water from the return water pond is also used for flushing the tailings pipelines when required.

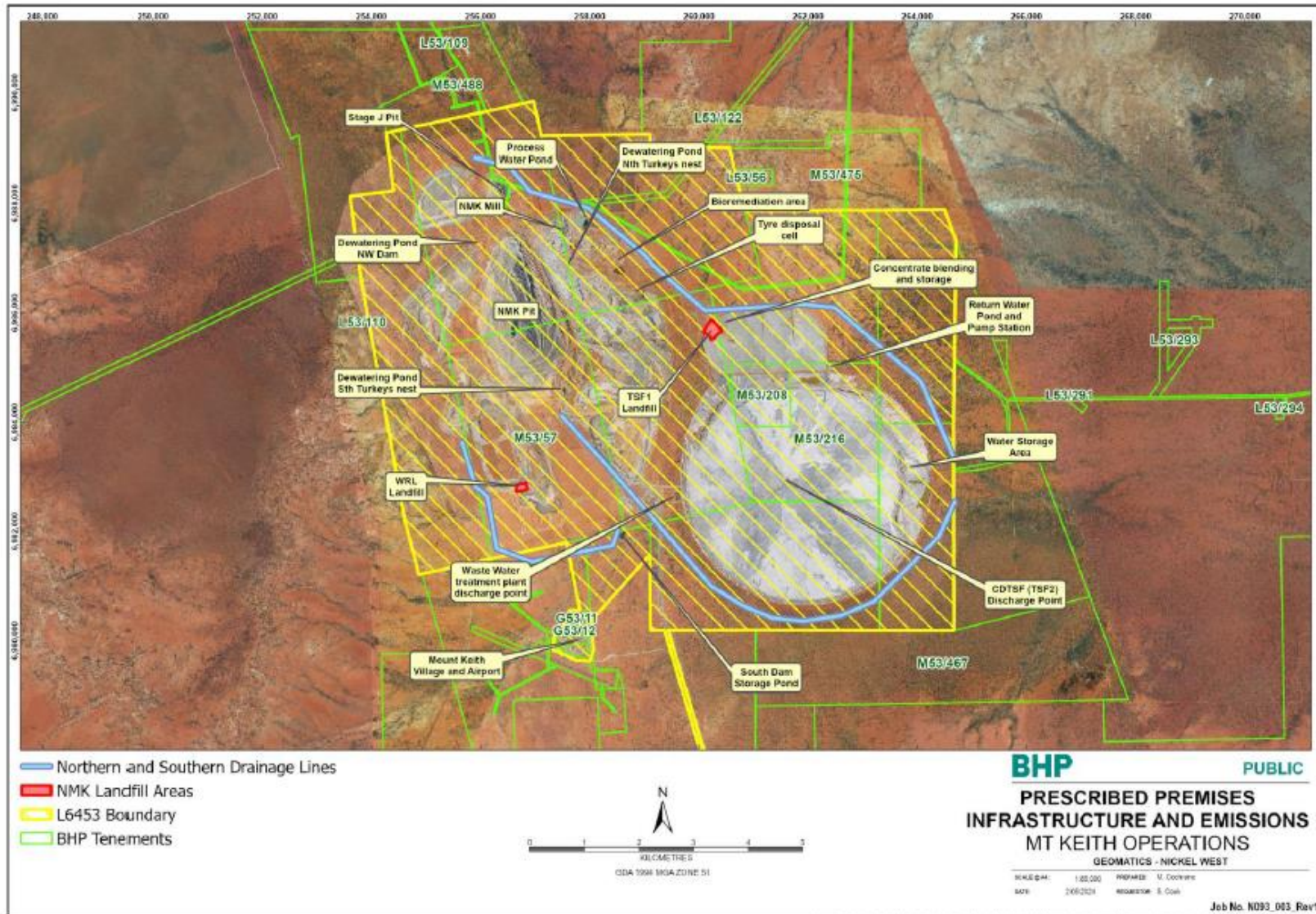


Figure 1: Premise boundary and key site infrastructure

Licence: L6453/1990/12

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2.2.2 Proposed Works for J Stage Discharge

Under extreme weather situations, stormwater discharge will be transferred from the CDTSF WSA to the J Stage pit via two proposed options:

- Option one will use existing pipelines to transfer the stormwater from the WSA via the return water pond, then onto the process water pond before being pumped into Stage J. This existing pipeline circuit is primarily used for tailings return water to be pumped to the process water pond for use in Mill operations and as such discharge to the J Stage will only be possible whilst the Mill is non-operational or operating at a reduced capacity. Discharge waters from the WSA will mix with waters within return water pond and process water pond prior to be pumped into J Stage. Entrained fines from the WSA will settle out into the return and process water ponds, reducing the sediment load of discharge entering the J Stage.
- Option two will involve the installation of a new pipeline from the decant pump station within the WSA to J Stage Pit. Water Pumps will be installed as required at locations along the pipe route. Figure 2 provides an indicative layout of the proposed pipeline layout (if required by licence holder).

Table 1 below details the recent water quality within the WSA post rain event (samples taken 13 March 2024).

Table 1: Analysis of water with WSA

Analyte	Unit	Result
Field pH	pH unit	7.42
Field Electrical Conductivity	µS/cm	6440
pH Value	pH Unit	7.26
Electrical Conductivity @ 25 0C	µS/cm	6610
Total Dissolved Solids @1800 C	mg/L	4010
Hydroxide Alkalinity as CaCO ₃	mg/L	<1
Carbonate Alkalinity as CaCO ₃	mg/L	<1
Bicarbonate Alkalinity as CaCO ₃	mg/L	39
Total Alkalinity as CaCO ₃	mg/L	39
Silicon as SiO ₂	mg/L	1.8
Sulfate as SO ₄ - Turbidimetric	mg/L	871
Chloride	mg/L	1560
Calcium	mg/L	42
Magnesium	mg/L	243
Sodium	mg/L	884
Potassium	mg/L	54
Arsenic	mg/L	0.002
Cadmium	mg/L	<0.0001
Chromium	mg/L	<0.001
Copper	mg/L	<0.001
Lead	mg/L	<0.001
Nickel	mg/L	4.28
Selenium	mg/L	<0.01

Zinc	mg/L	<0.005
Nitrite as N	mg/L	0.03
Total Anions	meq/L	62.9

2.2.3 Additional Considerations for discharge into J Pit – Works Approval Application (W6869/2024/1)

On 9 November 2023, BHP Nickel West Pty Ltd submitted an application for a works approval to the department. This application is to undertake construction works, commissioning and time limited operations relating to mine dewatering activities for the Wedgetail Project which is located north of MKO .

This application is including a request for approval to discharge to J stage pit as a contingency for dewater whenever the MKO raw water pond is unable to receive water i.e. due to capacity or shutdown.

J Stage Pit has a holding capacity of 2,500,000 kL below the freeboard of 460 mRL (65.42 meters below ground level (mbgl)) and the expected annual discharge of mine dewater to J Pit (assessed under works approval W6869/2024/1) is estimated to be up to 13,698 kiloliters (kL) per annum.

The cumulative impact of the discharge volumes that has been applied for in the works approval is considered in the risk assessment for this licence amendment report.

Supporting documents submitted for works approval W6869/2024/1 also outlined that surrounding groundwater levels nearby J Stage Pit are approximately 495 mRL (~55 mbgl) (BHP 2023b) which will allow J Stage Pit to act as a groundwater sink. Groundwater is proposed to be kept within the fresh rock domain of J stage pit as the fresh rock has negligible inherent permeability to transmit water (BHP 2023a).

A fresh weathered rock/oxide layer (saprock) is present at approximately 470 mRL or 75.42 mbgl within J Pit (BHP 2024). It is proposed by BHP that the mine dewater will be stored below the saprock to mitigate any potential issues associated with acid generation and groundwater mounding (BHP 2023b). This information has been applied to this licence amendment application.

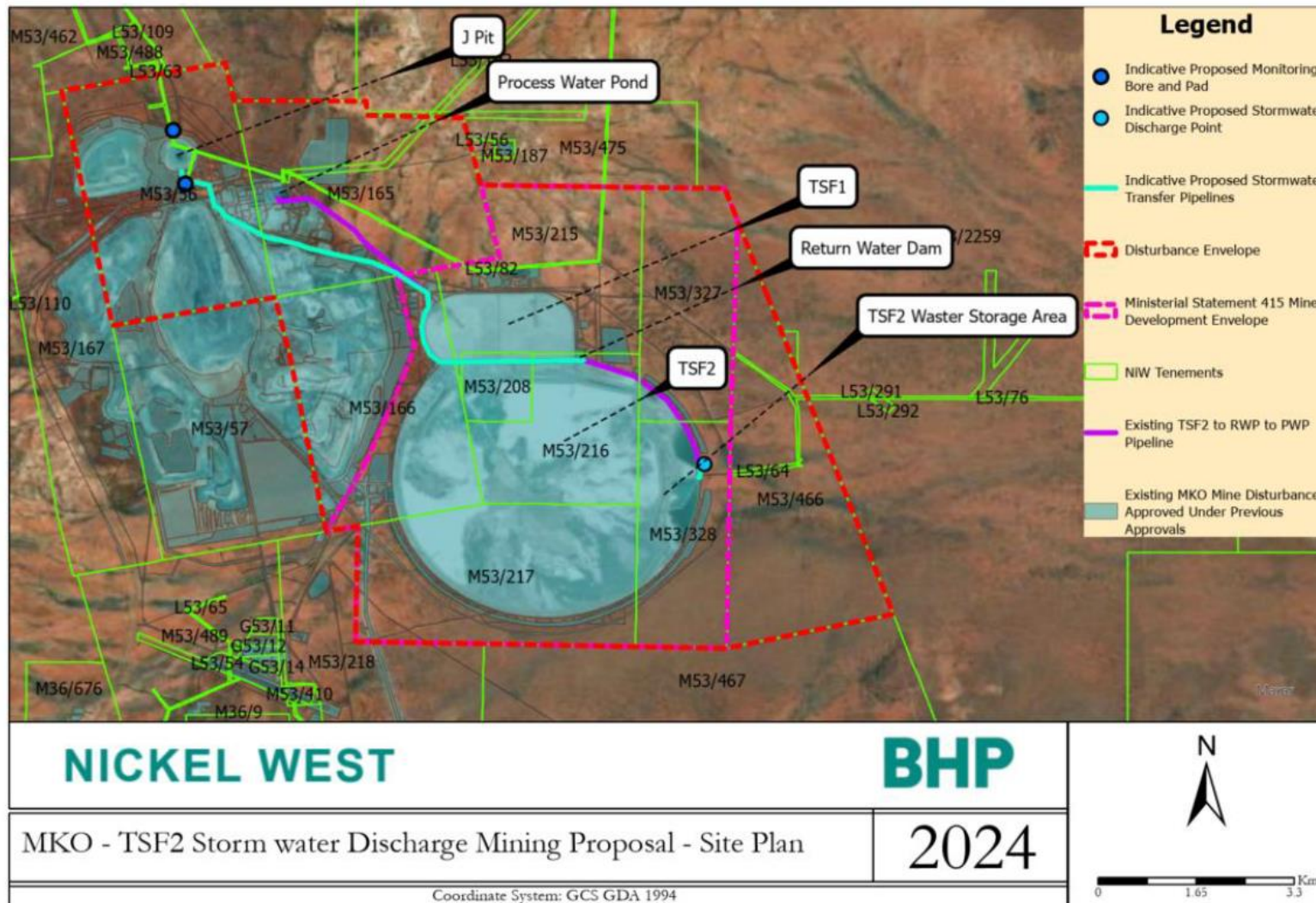


Figure 2: Option 2 - Proposed Installation of new pipelines (if required)

2.3 Part IV of the EP Act

Ministerial Statement (MS) 415 was issued on 7 May 1996 and approves the design and operation of the MKO CDTSF. A section 45c under the EP Act was approved on 14 October 2019 to increase tailing storage capacity, delineate the development area, and amend the proposed description and elements.

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 premises construction and operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	bulk earthworks and vehicle movements associated with construction of pipeline	Direct impact-disturbance to native vegetation	<ul style="list-style-type: none"> None proposed
Operation			
Saline water (mixture of CDTSF decant water, stormwater and process water)	Pipeline	Uncontrolled spill from pipeline or equipment failure	<ul style="list-style-type: none"> The pipeline and pumps will be located in secondary containment and / or have telemetry with automatic shut offs Pipelines inspected every 12 hours whilst operating Management of spills will first isolate the system and stop the release of water. If required, contaminated soil will be removed. An investigation and necessary works will be undertaken to prevent further incidents.
	Discharge to J Stage Pit	Overtopping	<ul style="list-style-type: none"> Water level in J Stage Pit to be maintained below RL 460m (Maximum pit water level to be marked on the pit wall

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> • Inspections to be undertaken 12 hourly on pit water level • Survey of water level to be undertaken annually • Water quality of discharge into J State Pit to be tested at the commencement of discharge operations and weekly whilst discharge is occurring.
		Seepage	<ul style="list-style-type: none"> • Monitoring of groundwater monitoring bores, one to the north and one to the south of J-pit (within 100 m of the final pit shell) • Maintaining pit water levels within the extremely low permeability domain, that is below the fresh rock domain contact height. • Maintaining regional groundwater flow towards the pit by setting maximum pit water level below the regional water table elevation. • Water quality samples will be collected from the pit lake on a 6 monthly basis • Visual inspection carried out monthly with records kept.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded 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 3 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 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Wanjarri Nature Reserve	Adjacent to and intersects the southeastern corner of the proposed amended premises boundary.
Environmental receptors	Distance from prescribed activity
Flora, vegetation: Violet Range (Perseverance Greenstone Belt) vegetation complexes (banded ironstone formation) Priority 1 Ecological Community (PEC)	<p>The Prescribed Premises is located within the Priority 1 PEC.</p> <p>No threatened flora species as listed under the <i>Biodiversity Conservation Act 2016</i> have been recorded within the Prescribed Premises.</p> <p>Fourteen Priority Flora have been recorded within the</p>

	Mount Keith Satellite tenement area.
Conservation Significant Fauna: Priority 4 species L Brush-tailed Mulgara	Brush-tailed Mulgara has the potential to utilise the habitat of the Prescribed Premises. No species of conservation significance have been recorded within the Prescribed Premises. Subterranean fauna surveys have revealed some species that are not well known or well collected within the region, but these were considered within the EPA assessment of the project as approved under MS 1087.
Surface water: Ephemeral surface drainage lines, the largest of which is Jones Creek	Ephemeral surface drainage lines, including Jones Creek, lie within the Prescribed Premises.
Groundwater	Underlying groundwater level near the J Stage pit is approximately 55 mbgl (BHP 2023b)
Conservation Areas – Wanjarri Nature Reserve (Class A Nature Reserve)	Boundary of the Wanjarri Reserve is approximately 1 km from the Prescribed Premises
Aboriginal and European Heritage	<p>Registered heritage sites have been identified in the vicinity of and within the Prescribed Premises.</p> <p>The Licence Holder has an agreed 'Cultural Heritage Management Plan' in place with the Tjiwarl people.</p> <p>The results of all heritage surveys and location of Aboriginal heritage sites are recorded in the Licence Holder's database, which is used in the internal Environmental and Heritage Impact Assessment process, prior to land disturbance to ensure heritage sites are not accidentally impacted</p>

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 incomplete 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 4.

The Revised Licence L6453/1990/12 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4: 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	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Construction								
Installation of new pipeline and water pumps from decant pump station within WAS to J Stage pit	Dust	<p>Pathway</p> <p>Dust transported offsite via air / windborne pathways.</p> <p>Impact</p> <p>Causing impact to receptors (smothering)</p>	Native vegetation	Refer to Section 3.1.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A
Operation								
Discharge of excess water (mixture of CDTSF return water/process water and captured stormwater) from WSA to the J Stage Pit	Saline water	<p>Pathway</p> <p>Rupture/leak of pipeline releasing saline water to land and potentially mobilizing sediments offsite.</p> <p>Impact</p> <p>Contamination of soil / impact to vegetation</p>	Native vegetation /soil	Refer to Section 3.1.1	C = Minor L = Unlikely Medium Risk	Y	New Condition 2	Licence holder's proposed controls for managing pipeline leaks from any new pipelines are acceptable and have been conditioned within the licence.
	Saline water	<p>Pathway</p> <p>Overtopping J Pit causing a discharge</p>	Native Vegetation / soil	Refer to Section 3.1.1	C = Major L = Rare	Y	Condition 1 Condition 12	An expected volume of water to be discharge to J pit has not been provided, however it is noted that J Pit currently has 2.5 Mm ³ water

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Risk Event					Risk rating ¹	Licence Holder's controls sufficient ?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls	C = consequence L = likelihood			
		to land Impact Impact to soil and Direct contact with native vegetation			Medium Risk			storage capacity. Discharge volumes will be metered and recorded monthly and the licence holder is proposing to maintain a freeboard below 460mRL (65.42 mbgl) It is also noted that there may be an additional discharge volume to J Pit. The expected annual discharge of mine dewater to J Pit identified in works approval W6869/2024/1 is estimated to be up to 13,698 kL per annum (mine dewater), The licence holder will be required to consider this additional discharge to J pit when maintaining the proposed freeboard. In order to ensure overtopping doesn't occur the licence holder's proposed freeboard will be conditioned within the licence along with a requirement to undertake frequent inspections.
		Pathway Saline water contacting the oxide layer within J stage Pit Impact	Brackish perched groundwater aquifer		C = Moderate L = Unlikely Medium Risk	Y	Condition 1 Table 1 Condition 18 Table 7	The oxide layer within J Pit is located approximately 75.42 mbgl and the brackish perched aquifer intersects within J Pit approximately from 35.42 mbgl to 75.42 mbgl. The surrounding groundwater levels around J Pit are approximately 55 mbgl.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient ?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		Potential acid generation.						<p>The proposed freeboard height of 65.42 mbgl is 10 m below the oxide layer and the brackish perched aquifer. When operating J Pit below the freeboard height it is anticipated that the pit will continue to act as a groundwater sink reducing risk of groundwater mounding and impacts of any potential acid generation caused by hypersaline mine dewater discharge to J Pit.</p> <p>Condition 18 Table 7 has been updated to include the two new monitoring bores around J stage pit. Condition 18 has been updated to include groundwater monitoring to occur quarterly for standing water levels, pH and TDS.</p> <p>The licence holder also proposed to monitor the water quality within J Pit lake on a six monthly basis. No details on what parameters to be monitored was provided. It has been determined that pH, TDS and a suite of relevant contaminants will be required to be monitored on a six monthly basis within the pit lake. This has been deemed necessary due to the potential for these contaminants to be present within the water from the WSA.:</p> <p>The licence holder is also proposing to monitor the quality of</p>
		<p>Pathway</p> <p>Seepage of hypersaline mine dewater through pit wall</p> <p>Impact</p> <p>Groundwater mounding</p> <p>Changes in groundwater quality</p>	<p>Native vegetation</p> <p>Brackish perched groundwater aquifer</p>		<p>C = Moderate</p> <p>L = Unlikely</p> <p>Medium Risk</p>	<p>Y</p> <p>Condition 1 Table 1</p> <p>Condition 18 Table 7</p>		

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient ?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								the water discharge from the WSA on commencement of the discharge and weekly while discharging. It has been determined that water quality testing prior to each discharge event is sufficient.

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

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

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
<i>Licence Holder was provided with draft amendment on 11 November 2024</i>	<i>Refer to Appendix 1</i>	<i>Refer to Appendix 1</i>

5. Conclusion

Based on the assessment in this Amendment 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.

5.1 Summary of amendments

Table 6 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 6: Summary of licence amendments

Condition no.	Proposed amendments
Condition 1 Table 1	J Stage Pit and J Stage Pit operational controls added to Licence. Decant water pond renamed to "Return Water Pond"
Condition 2 Table 2 and condition 3	Condition 2 Table 2 removed. Table 2 removed as previously constructed monitoring bores KBM08-KBM18D have been assed and found to be compliant.
Condition numbers and table numbers edited from condition 2 onwards due to removal of conditions 2 and 3 and former table 2.	
Condition 2	New condition 2 added including table 2 to outline construction requirements for dewatering pipeline.
Condition 12	J Stage Pit inspection requirements added to Table 5 Saline water pipeline inspection requires added to table 5
Condition 17	Monitoring requirements for water discharge to J pit added to table 6
Condition 18 Table 7	Additional monitoring bores added to Licence in vicinity of J Pit.
Condition 18 Table 8	J Stage pit lake monitoring requirements added to Licence.
Condition 27	Construction audit condition added for pipelines detailed in table 2
Condition 27	Minimum requirements of condition 27 included as a minimum.

Figure 1,2,3, 4, 5, 6 and 8	New figure 3 (Ambient Monitoring Locations for CDTSF Water Storage Area) and new Figure 8 (Indicative J Stage Pit Stormwater Transfer Pipeline). Minor updates to figure 1,2 4 and 4 to reflect updated site conditions.
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References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. BHP Nickel West, 2024, *Proponent Response to Request for Further Information for W6869/2023/1 Application*, letter dated 9 February 2024
3. BHP Nickel West, 2023b, *Hydrological Assessment or J Stage Pit Contingency Water Storage* (Document number: NiW-PT-WC-R-2), 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. *Environmental Protection Authority (EPA) 2018, Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual*, Environmental Protection Authority, Perth, WA.

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

Condition	Summary of Licence Holder's comment	Department's response
Condition 1, Table 1: Infrastructure and equipment requirements	<p>JBHP requests flexibility in how freeboard in J Stage Pit is visually monitored.</p> <p>BHP NiW requests the operational requirements are amended to state <i>"Freeboard in the Stage J Pit is to be visually monitored to ensure water levels are not above 65.42 mbgl (460mRL)."</i></p> <p>As per the Trigger Action Response Plan detailed in the licence amendment submission, BHP NiW requires the ability to proactively discharge water from the CDTSF Water Storage Area in preparation for, and during, large rainfall events.</p> <p>BHP NiW requests the operational requirements are amended to state: <i>"Under large rainfall events, or in preparation for large rainfall events, water from the CDTSF Water Storage Area... is permitted to be discharge to J Pit."</i></p>	Condition 1 Table 1 amended to provide the requested flexibility for monitoring and discharge in preparation of large rainfall events.
Condition 2, Table 2: Infrastructure requirements – groundwater monitoring wells	<p>Requires installation of proposed monitoring bores.</p> <p>Since submission of this application in June 2024, BHP NiW has undertaken further assessment of groundwater surrounding J Stage Pit. This assessment has identified 2 existing bores which are appropriate to monitor potential groundwater impacts which may occur as a result of discharging water in J Stage Pit. As such, it is considered unnecessary to install new bores for monitoring purposes.</p>	<p>The location of the constructed bores has been reviewed and their location has been deemed acceptable. Condition 2 and Condition 3 have been removed, which relate to construction of monitoring bores. Existing monitoring bores</p> <p>MKRC725 and MKRC731 added to condition 18 table 7. New monitoring bores displayed in new Figure 3.</p>
Condition 17 Table 6: Process Monitoring	<p>Circumstances which trigger the requirement to discharge from the CDTSF WSA to J Stage Pit may be during periods of significant rainfall. Often during these events access across the site can be restricted due to safety concerns. Whilst every effort</p>	<p>In consideration of practicalities of sampling during high rainfall events, the department has updated to the applicants requested wording.</p>

Condition	Summary of Licence Holder's comment	Department's response
	<p>will be made to ensure sampling prior to discharge occurs, there may be circumstances where restricted access means this may not be possible.</p> <p><i>BHP NiW requests the frequency of spot sampling is amended to:</i></p> <p><i>"Spot sample at commencement of each discharge event to J Stage Pit"</i></p>	