



Application for Licence Amendment

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

Licence Number	L7179/1997/11
Licence Holder	Dampier Salt Limited
ACN	008 706 590
File Number	DER2016/000598-1
Premises	Port Hedland Operations Gilbert Street, PORT HEDLAND WA 6721 Part of Lot 6098 on Deposited Plan 35618 Certificate of Title Volume 3118 Folio 752 As defined by the Premises map attached to the Revised Licence
Date of Report	30 May 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 L7179/1997/11 is held by Dampier Salt Limited (Licence Holder / DSL) for the Port Hedland Operations (the Premises), located within the municipality of the Town of Port Hedland and adjacent to the Port Hedland harbour. The Licence Holder operates out of a shared berth which is leased from the Pilbara Ports Authority (PPA).

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 L7179/1997/11 has been granted.

The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

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 Amendment summary

On 18 January 2024, the Licence Holder submitted an application (DSL 2024a) to the department to amend Licence L7179/1997/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is to install and operate an additional humeceptor (to a total of three for the premises).

There will be no changes to the existing approved category 58A design capacity (75,000 tonnes per day) as a result of this amendment.

The proposed humeceptor will receive water via an underground low-density polyethylene (LDPE) pipe from a sump at the base of the conveyor transfer tower (CV200-CV300). The water will pass through the humeceptor for treatment, with the treated water discharged via an existing steel pipeline that ends adjacent to an offsite existing stormwater drain on disturbed ground.

The humeceptor is intended to provide additional assurance should an incident occur where hydrocarbons are released into the washwater.

The Licence Holder conducted sampling of the untreated washwater in September 2023. The results as shown in Table 1 indicate that the untreated water samples are below the Limits of Reporting (LOR) for Total Recoverable Hydrocarbons and BTEX volatile compounds.

The Licence Holder confirmed (DSL 2024b) that from an environmental perspective the proposed addition of a humeceptor and discharge point is approved by PPA.

Table 1: Results of port discharge water

Client Sample ID			Port Discharge Water
Sample Matrix			L23-Se0066159
Eurofins Sample No.			Sep 26, 2023
Date Sampled			
Test/Reference	LOR	Unit	
Total Recoverable Hydrocarbons - 1999 NEPM Fractions			
TRH C6-C9	0.02	mg/L	< 0.02
TRH C10-C14	0.02	mg/L	< 0.02
TRH C15-C28	0.04	mg/L	< 0.04
TRH C29-C36	0.04	mg/L	< 0.04
TRH C10-C36 (Total)	0.04	mg/L	< 0.04
BTEX			
Benzene	0.001	mg/L	< 0.001
Toluene	0.001	mg/L	< 0.001
Ethylbenzene	0.001	mg/L	< 0.001
m&p-Xylenes	0.002	mg/L	< 0.002
o-Xylene	0.001	mg/L	< 0.001
Xylenes - Total*	0.003	mg/L	< 0.003
BTEX			
4-Bromofluorobenzene (surr.)	1	%	85
Total Recoverable Hydrocarbons - 2013 NEPM Fractions			
Naphthalene ^{ND2}	0.001	mg/L	< 0.001
TRH >C10-C16 less Naphthalene (F2) ^{ND1}	0.02	mg/L	< 0.02
TRH C6-C10	0.02	mg/L	< 0.02
TRH C6-C10 less BTEX (F1) ^{ND4}	0.02	mg/L	< 0.02
Total Recoverable Hydrocarbons - 2013 NEPM Fractions			
TRH >C10-C16	0.02	mg/L	< 0.02
TRH >C16-C34	0.05	mg/L	< 0.05
TRH >C34-C40	0.05	mg/L	< 0.05
TRH >C10-C40 (total)*	0.05	mg/L	< 0.05

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 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
Sediment laden stormwater / contaminated wash water if humeceptor is not operating effectively	Stormwater / wash water from the sump at the base of the conveyor transfer tower (CV200-CV300)	Discharges to land	If maintained to specification, the humeceptor is designed to capture and retain Total Suspended Solids down to 10 microns, and remove up to 98% of free oils from wastewater. Humeceptor pumped out on a quarterly basis and contents removed from the prescribed premises by a licensed contractor for disposal at an appropriately licensed facility.
		Discharges to marine environment	

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
No human receptors in proximity	Proposed discharge point is a stormwater drain between DSL's premises and BHP's Port Operations premises.
Environmental receptors	Distance from prescribed activity
Mangrove community	Located on opposite side of Stingray Creek from the port and also within the harbour.
Port Hedland harbour – marine ecosystems	Within and directly adjacent to the premises boundary. Identified as requiring a moderate level of ecosystem protection in the <i>Department of Environment's Pilbara Coastal Water Quality Consultation Outcomes: Environmental Values and Environmental Quality Objectives, March 2006</i> .

Aboriginal Sites and Heritage Places	Marapikurrinya Yintha Site. The Application Form states, "No new disturbance is proposed".
<i>Rights in Water and Irrigation Act 1914</i>	Premises located within the Proclaimed Pilbara Groundwater and Surface Water Areas.
Groundwater	4-5 m below ground level and considered brackish.

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 L7179/1997/11 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	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			
Operation								
Stormwater / wash water from the sump at the base of the conveyor transfer tower (CV200-CV300)	Sediment laden stormwater / contaminated wash water if humeceptor is not operating effectively	Discharges to land from discharge point or leaks and/or spills along pipeline route causing soil contamination due to the presence of hydrocarbons in the water Increased sedimentation Increased turbidity and presence of hydrocarbons if discharged to the marine environment	Marine ecosystem Mangrove communities Soil / land	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1 – Maintaining and operating site infrastructure and equipment in good working order Condition 2 – Infrastructure and equipment requirements Condition 3 – Authorised discharge points	N/A

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
Licence Holder was provided with draft amendment on 08 May 2024	Licence Holder responded on 28 May 2024 stating <i>“The business will be happy to proceed with the draft, no comments or changes have been requested from the DSL team.”</i>	N/A

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
Front page	Updated in line with current licence template.
Explanatory notes	Deleted in line with current licence template.
Definitions	Move to the back of the licence and now in Table 3. Definitions added, updated and/or removed as applicable.
Licence history	Included in line with current licence template.
Interpretation	Moved and updated in line with current licence template.
Licence conditions	Included in line with current licence template.
Previous Condition 1, Table 2	Deleted, in line with current licence template.
Condition 1 (new)	Included to ensure all site infrastructure and equipment listed in Schedule 3 is maintained and operated in good working order.
Condition 2	Updated to reference Schedule 1, Figure 1 which shows the location of the three Humeceptors at the Premises. Administrative updates.
Operations	The heading Operations changed to read Emissions and discharges.

Condition no.	Proposed amendments
Condition 3 (new)	Included to authorise the emission of treated wastewater from the humeceptor discharge points.
Record-keeping	The heading Record-keeping changed to read Records and reporting.
Condition 6	Previous condition 6 has been deleted and replaced with this condition in line with the current licence template.
Previous condition 4	Has been split into two conditions and is now covered by conditions 7 and 8.
Previous condition 7	Deleted, in line with current licence template.
Schedule 1, Premises map	Updated and replaced with a new Figure.
Schedule 3	Updated to remove the Primary Activities table as this is now on the front page. Infrastructure and equipment table updated to define the location, figure and reference. Reference to site layout removed.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Dampier Salt Limited (DSL) 2024a, *Dampier Salt Limited (DSL) Port Hedland Port – Amendment Application*, received 18 January 2024 (DWER reference DWERDT893984).
5. DSL 2024b, *RE: [External] L7179 DSL Port Hedland Port amendment – Questions*, dated 01 May 2024 (DWER reference A2275085).