



Application for Licence Amendment

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

Licence Number	L7753/2001/7
Licence Holder	Process Minerals International Pty Ltd
ACN	063 988 894
File Number	DWERVT16547
Premises	Coobina Chromite Operations Legal description – Mining Tenements ML52/10, M52/791 and M52/798 NEWMAN WA 6753 As defined by the Premises maps attached to the Revised Licence
Date of Report	23 December 2024
Decision	Revised licence granted

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1. Decision summary

Licence L7753/2001/7 is held by Process Minerals International Pty Ltd (Licence Holder/ PMI) for the Coobina Chromite Operations (the Premises / the Project), located at Mining Tenements ML52/10, M52/791 and M52/798.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during construction and operation of the Premises. As a result of this assessment, Revised Licence L7753/2001/7 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. 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 Application summary

On 4 October 2024, the Licence Holder submitted an application to the department to amend Licence L7753/2001/7 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- extend premises boundary to align with the landfilling area approved under the *Mining Act 1978* (Mining Act);
- increase Category 64 landfill capacity to provide capacity for the decommissioning and closure activities;
- include Inert Waste Type 2 in waste acceptance provisions (i.e. remove the restriction to tyres only, to allow disposal of similar materials such as conveyor belting); and
- extend expiry date on the licence for five years.

This amendment is limited only to changes to Category 64 activities on the existing licence. No changes to the aspects of the licence relating to Category 5 have been requested by the Licence Holder.

Table 1 below outlines the proposed changes to the existing licence.

Table 1: Proposed design capacity changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
64	365 tonnes per annual period	10,530 tonnes per annual period	Licence Holder requested to increase design capacity to support the decommissioning and closure process for the mining operation.

- Putrescible waste will be covered with a minimum of 200 mm of inert and incombustible material monthly or as soon as practicable after deposit and before compaction.
- Inert Waste Type 2 (tyres) will be covered with at least 100 mm of inert and incombustible material during the operational phase. Tyres will only be disposed of in designated tyre disposal areas (Schedule 1 of existing licence).
- Special Waste Type 1 will be covered with at least 500 mm of inert and incombustible material during the operational phase. It will only to be disposed of into a designated asbestos disposal areas with the landfill. It will not be deposited within the upper 2 m of the final landfill tipping surface and no works will be carried out on the landfill that could release asbestos fibres to the environment.

2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the Amendment Notices as summarised in Table 2.

Table 2: Licences consolidated in this amendment

Instrument	Issued	Summary of approval
L7753/2001/7	29/04/2016	Notice of Amendment of Licence Expiry Dates
L7753/2001/7	16/05/2022	Notice of amendment of licence reporting requirements (biennial environmental reporting requirements)

The department has not undertaken any additional risk assessment of the Premises related to previous Amendment Notices.

In consolidating the licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the Licensee to obtain the form from the department's website;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full consolidation of licence conditions as they relate to this Revised Licence are detailed in Section 5.1. Previously issued Amendment Notices will remain on the department's website for future reference and will act as a record of the department's decision making.

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 3 below. Table 3 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 3: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Operational landfill (all waste types)	Air/windborne pathway	Restricting traffic to most direct route on the site and prohibiting traffic on non-active areas. Speed limits on facility access roads. Existing management provisions specified in the Licence (waste cover requirements etc.).
Noise		Air/ windborne pathway	Machinery operations and vehicular access are to be restricted to daytime only. Mobile equipment will be operated and serviced in line with the manufacturer's specifications. The closest residence to the proposed landfill area is 15 km from the facility. Screened out: not considered further in DWER's risk assessment process.
Landfill leachate		Seepage to land impacting groundwater quality	Landfill cells with minimum separation distance of 2 m to groundwater. Ground water levels and quality will continue to be monitored at least annually under the conditions of L7753/2001/7.
Sediment laden stormwater		Seepage to land impacting groundwater quality	Waste deposited into defined disposal trenches: 30 m in length, 10 m in width and 3 m in depth (900 m ³ /pod). No other stormwater management measures have been proposed.
Windblown waste		Air/windborne pathway	No controls proposed.
Contaminated stormwater or fire water associated with a tyre fire	Temporary above-ground storage of tyres prior to landfilling Landfilling of tyres	Discharge to land causing contamination to soil, surface water, and/or groundwater	Tyres to be stored in designated temporary storage areas until landfilled. Tyres are not to be cut, shredded or modified in any way.
Tyre fire smoke / toxic fumes		Air/ windborne pathway	Tyres to be landfilled in accordance with Part 6 of the <i>Environmental Protection Regulations 1987</i> (EP Regulations), including in batches separated from each other by at least 100 mm of soil and each batch consisting of not more than 1,000 whole tyres.

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 4 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 4: Sensitive human and environmental receptors and distance from prescribed activity

Environmental receptors	Distance from prescribed activity
Surface water	Within the Premises. The amended landfill boundary is approximately 900m north-west of the Carmulla Creek
Groundwater	The standing water level in the premises lies approximately 10-16 metres below top of bore casing. The distance from the landfill to groundwater is significant, therefore, seepage risk is low and will be not assessed further.

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 5.

The Revised Licence L7753/2001/7 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 64 activities.

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

Table 5. Risk assessment of potential emissions and discharges from the Premises during construction and 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				
Operation								
Landfilling, increase in capacity (all waste types)	Dust	Air/windborne pathway causing impacts to vegetation and to surface water	Carmulla Creek 900m south-east Vegetation & Fauna	Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	N/A	N/A
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Carmulla Creek 900m south-east Vegetation & Fauna	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	N/A	N/A
	Landfill leachate	Seepage to land impacting groundwater quality	Groundwater	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 9– Waste processing requirements for landfill operations Condition 13 – Groundwater monitoring requirements	N/A
	Windblown waste	Air/windborne pathway	Carmulla Creek 900m south-east Vegetation & Fauna	N/A	C = Slight L = Possible Low Risk	Y	Condition 9 – Waste processing requirements for landfill operations Condition 10 – Management of windblow waste	N/A

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			
Temporary above-ground storage of tyres prior to landfilling Landfilling of tyres	Contaminated stormwater or fire water associated with a tyre fire	Discharge to land causing contamination to soil, surface water, and/or groundwater	Carmulla Creek 900m south-east Vegetation & Fauna Groundwater	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition 9 – Waste processing requirements for landfill operations Condition 13 – Groundwater monitoring requirements	New requirements have been imposed to manage associated risks (requirements included in Condition 5): 1) The number of tyres temporarily stored above-ground are to be less than 100 tyres (limit for Category 57; <i>Used tyre storage</i>). 2) Above-ground storage to be managed in accordance with the 'External Tyre Storage' requirements outlined in the Department of Fire and Emergency Services (DFES) Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres (DFES, Version 1. 2020; as amended from time to time).
	Tyre fire smoke / toxic fumes	Air/ windborne pathway	Vegetation & Fauna	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N		

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 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 6 July 2024	Comments received on 13 December 2024 are in Appendix 1	Response on Appendix 1

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 7 provides a summary of the proposed amendments and consolidated changes 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 7: Summary of licence amendments and changes

New condition No.	Existing condition No.	Condition summary	Conversion notes
Licence expiry		Expiry Date: 26 February 2025 extended until: 26 February 2030	
All	-	The term 'Licence Holder' has replaced 'Licensee'. The term 'must' has replaced 'shall'.	
-	1.1.1 1.1.2	Interpretation and definitions	Previous conditions 1.1.1 and 1.1.2 removed. Revised 'Interpretation' and 'Definitions' sections.
N/A	1.1.3 1.1.4	References to standards, guidelines and/or codes of practice	Redundant condition. This information is now outlined in the revised 'Interpretation' section of the licence.
Condition 1	1.3.7	Production or design capacity limits	Relocated and renumbered. Design capacity increased from 365 to 10,530 tonnes per annual period
Condition 2	1.2.1	General requirement to maintain all pollution control and monitoring equipment	Relocated and renumbered.
Condition 3	1.2.3	Prevention of contamination and containment of contaminated stormwater	Condition revised to remove allowance to treat contaminated stormwater prior to being discharged from the premises.

New condition No.	Existing condition No.	Condition summary	Conversion notes
			Separate approval under Part V of the EP act will be required if treatment activities are required.
Condition 4 and 5	-	Dust management provisions	General dust management provisions have been reinstated on the licence to ensure contemporary regulatory controls.
Condition 6	1.3.5	Tailings discharges into the Sedimentation Ponds	Relocated and renumbered.
Condition 7	1.3.6	Freeboard requirements for Sedimentation Ponds	Relocated and renumbered.
Condition 8 and 9	1.3.1 1.3.2	Waste acceptance and processing conditions	Relocated and renumbered. Slight revisions to condition wording. Intent remains the same. Restrictions for Inert Waste Type 2 materials removed. New requirements for temporary tyre storage included. (restrictions on the number of tyres stored and reference to DFES Guidelines). Table 3 updated the quantity limit. Table 5 updated material cover requirement to be done with Clean fill or Inert Waste Type 1.
Condition 10	1.3.4	Wind-blown waste management	Relocated and renumbered.
Condition 11 and 12	2.1.1 and 2.1.2	General monitoring requirements.	Relocated and renumbered.
Condition 13	2.2.1	Ambient environmental quality monitoring	Relocated and renumbered.
Condition 14	3.1.1	General information and record keeping requirements	Relocated and renumbered.
Condition 15	3.1.3	Complaints management requirements	Relocated and renumbered.
Condition 16	3.1.2	Annual Audit Compliance Report (AACR) requirements	Relocated and renumbered.
Condition 17	3.2.1 3.2.2	Biennial environmental reporting requirements	New condition wording and consolidation of requirements from the Notice of amendment for reporting requirements (biennial environmental reporting requirements) (16/05/2022). Groundwater monitoring reporting requirements have been updated to reflect contemporary regulatory requirements. New reporting provision included so that a summary of completed decommissioning and closure works is provided.

New condition No.	Existing condition No.	Condition summary	Conversion notes
Condition 18	3.3.1	Notification requirements	Relocated and renumbered.
Schedule 1: Maps	Schedule 1: Maps	Maps and Figures	New naming convention, maps updated, addition of

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.

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

Condition	Summary of Licence Holder's comments	Department's response
8 – Table 3	Licence Holder requested that the quantity limit in Table 3 be changed to reflect the proposed increases to landfill capacity, being 10,530 tonnes per annual period.	Change supported – the quantity limit in Table 3 has been updated.
9 – Table 5	Licence Holder requested to change the cover requirement for 'Inert Waste Type 2 (tyres)' from 'clean fill or Inert Waste Type 1' to 'Inert and incombustible material'.	Landfill cover material requirements have been revised to ensure consistency for all waste types (cover material must be 'clean fill or inert waste type 1')
17 (b)	Licence Holder requested to change the Environmental Report submission date to the next biennial reporting date (being 29 September 2025)	Change supported – next biennial reporting date has been updated to the 29 September 2025.
Figure 1 and Figure 2	Licence Holder requested to update Figure 1 and 2 with revised figures.	Change supported – revised figures have been included in the final revised licence.