



Amendment Report

Application for Licence Amendment

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

Licence Number	L7815/2001/11
Licence Holder	Northern Star (Thunderbox) Pty Ltd
ACN	107 154 727
File Number	2012/006911-1
Premises	North Eastern Goldfields Operations Mining tenements L36/155, L36/157, L36/158, L36/181, L36/193, L36/199, L36/202, L37/61, L37/73, L37/142, L37/166, L37/181, L37/199, L37/215, L37/216, M36/35, M36/177, M36/421, M36/428, M36/462, M36/473, M36/494, M36/503, M36/504, M36/512, M36/525, M36/527, M36/541, M36/542, M36/582, M37/339, M37/340, M37/356, M37/357, M37/358, M37/359, M37/360, M37/361, M37/465, M37/367, M37/368, M37/437 and M36/599 LEINSTER WA 6437
Date of Report	As defined by the attached map in the Revised Licence
Decision	16 April 2021
Decision	Revised licence granted

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A/MANAGER – RESOURCE INDUSTRIES

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

Table of Contents

1. Decision summary	2
2. Scope of assessment	2
2.1 Regulatory framework	2
2.2 Application summary	2
3. Risk assessment.....	3
3.1 Source-pathways and receptors	3
3.1.1 Emissions and controls	3
3.1.2 Receptors.....	4
3.2 Risk ratings.....	2
4. Detailed risk assessment – Leachate of TSF	5
4.1 TSF leachate	5
4.2 Applicant controls	5
4.3 Risk Rating	5
5. Consultation.....	5
6. Conclusion	6
6.1 Summary of amendments.....	7
References.....	7
Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions	8
Appendix 2: Application validation summary.....	10
Table 1: Treated effluent quality	2
Table 2: Proposed throughput capacity changes.....	3
Table 3: Licence Holder controls	3
Table 4: Sensitive human and environmental receptors and distance from prescribed activity.	5
Table 5. Risk assessment of potential emissions and discharges from the Premises during operation.....	3
Table 6: Treated effluent into TSF.....	5
Table 7: Consultation	6
Table 8: Summary of licence amendments	7
Figure 1: Treated effluent pipelines and discharge points	1

1. Decision summary

Licence L7815/2001/11 is held by Northern Star (Thunderbox) Pty Ltd for the North Eastern Goldfields Operations (the Premises), located in Leinster, 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 L7815/2001/11 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

On 3 September 2020, the Licence Holder submitted an application to the department to amend Licence L7815/2001/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Increase the maximum daily throughput of the existing wastewater treatment plant (WWTP) from 75m³/day to 120m³/day.
- Installation of two additional treatment units, consisting of a modular 45m³/day fixed film sewage treatment system comprised of two self-contained units.
- Installation of infrastructure including a submersible pump in the existing anaerobic tank 2, infrastructure to feed flow to the two new treatment units and infrastructure to discharge treated effluent from the new treatment units to the existing effluent disposal tank.
- Treated effluent to be discharged at the existing approved discharge location at the Eastern Waste Dump (where it is currently discharged) or it will be pumped to and discharged at the tailings storage facility (TSF).
- Construction and operation of an additional mine dewater dam located to the south of the Thunderbox pit to store saline water for dust suppression.

Table 1 shows the manufacturer's specifications for the treated effluent quality.

Table 1: Treated effluent quality

Parameter	Treated effluent quality
5 Day BOD	<20 parts per million (ppm)
Total Nitrogen	<40ppm
Total Phosphorous	<12ppm
pH	6.5-8.5
Coliforms	<1,000 coliforming units/100mL

This amendment is limited only to changes to Category 6 and 85 activities from the Existing

Licence. No changes to the aspects of the existing Licence relating to Categories 5, 52, 64 and 73 have been requested by the Licence Holder. Table 2 below outlines the proposed category changes to the existing Licence.

Table 2: Proposed throughput capacity changes

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
85	75 m ³ /day	120 m ³ /day	The addition of treatment units to the existing WWTP increases the design capacity to 120 m ³ /day and therefore triggers Category 54. Category 54 will replace Category 85 on the licence.

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 *Guidance Statement: Risk Assessments* (DER 2017).

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 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
Treated wastewater	Wastewater treatment plant	Overflow of treatment tanks	The new treatment units will be fitted with automatic shut off valves which allow 380mm of free head space
		Sewage pipeline rupture	The untreated sewage line (already existing but will facilitate the increase in throughput) is buried from the village to the WWTP. From the WWTP to the discharge area, the treated effluent line is either buried, contained within a v-drain or on the waste dump. The pipeline route is inspected weekly to check for leaks.
		Leachate to groundwater	The Eastern waste rock dump is 40m high, meaning effluent would have to migrate through 40m of waste rock prior to infiltrating to land. Sprinklers will continue to be used to reduced the risk of pooling.

Emission	Sources	Potential pathways	Proposed controls
			<p>If treated effluent is not discharged to the waste dump, it will be incorporated into the tailings stream via the existing pipeline network.</p> <p>A water balance was modelled to include the treated effluent to the TSF which demonstrates that:</p> <ul style="list-style-type: none"> • The additional effluent inflow will increase the decant return from 31% to 33% for Cell A and 28% to 30% for Cell B; • The supernatant pond for both cells is expected to remain at the minimum; and • The estimated seepage rate will stay similar (ranging from 464 to 521 m³/month) therefore groundwater should not be adversely impacted.
Saline water	Mine dewater dam	Overtopping of dam	<p>The Licence Holder has stated that the dam will be operated in accordance with current licence conditions which includes:</p> <ul style="list-style-type: none"> • A 300 mm freeboard maintained; • A high water level shut off switch fitted to prevent overtopping; and • Daily (when operational) visual inspections for visual integrity and freeboard maintenance
		Leachate to groundwater	The dam will be HDPE lined to prevent leachate
		Wildlife access	Fence installed around perimeter of dam and fauna egress ladders/nets to be installed at each corner of the dam

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DER 2017), 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* (DER 2016)).

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

Human receptors	Distance from prescribed activity
Leonora	90km from the premises. Given the significant distance to this receptor, no Risk Event is foreseeable and therefore this receptor has not been considered in the risk assessment.
Goldfields Highway	Adjacent to premises boundary
Environmental receptors	Distance from prescribed activity
Groundwater (fresh TDS 370 – 740 mg/L; pH neutral to slightly alkaline 7.1 – 8.0)	Depth to groundwater in area is approximately 15 – 30 metres below ground level (mbgl)
Native vegetation	To the east of the waste rock dump is the TSF and to the west is the open pit, so there is minimal native vegetation around the discharge point. Directly to the east of the TSF there is native vegetation. To the north of the TSF, the Goldfields Highway cuts through section of native vegetation. Main surrounding vegetation type is open low woodland of <i>Acacia aptaneura</i> .

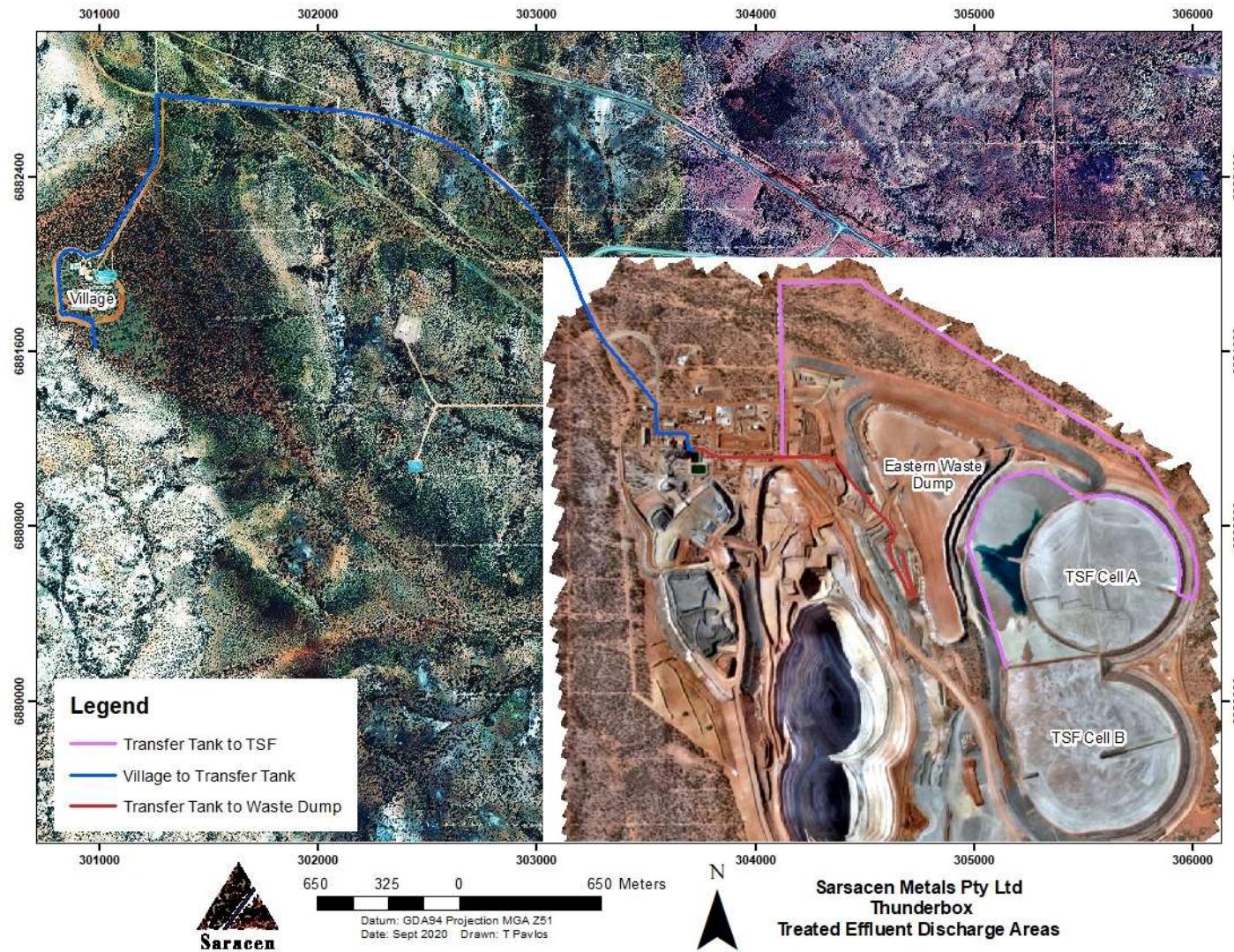


Figure 1: Treated effluent pipelines and discharge points

Licence: L7815/2001/11

IR-T15 Amendment Report Template v2.0 (July 2020)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DER 2017) 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 L7815/2001/11 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. waste water treatment.

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 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								
Wastewater treatment plant	Rupture of sewage pipes / overtopping of holding tanks resulting in sewage discharge to land	Direct discharge causing soil contamination inhibiting vegetation growth and survival	Adjacent vegetation Goldfields Highway Groundwater is approximately 15 – 30 mbgl	Refer section 3.1.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1.3.5 Condition 1.3.11	N/A
	Seepage through soil and infiltration to groundwater							
	Treated effluent to Waste Rock Dump	Leachate through the waste rock causing contamination to groundwater		Refer section 3.1.1	C = Minor L = Rare Low Risk	Y	<u>Condition 3.4.1</u>	Inclusion of a condition to monitor volumes of effluent directed to the waste dump and to the TSF respectively to ensure annual volumes are captured.
Saline water dam	Treated effluent to TSF	Leachate through the TSF to groundwater		Refer section 3.1.1	C= Moderate L= Unlikely Medium Risk	Y	Condition 2.4.1 <u>Condition 3.4.1</u>	Refer section 4 below
	Overtopping of dam	Direct discharge of hypersaline water causing soil contamination inhibiting vegetation growth and	Adjacent vegetation	Refer section 3.1.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1.3.2 Condition 1.3.3 Condition 1.3.5 Condition 1.3.11	N/A

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				
		survival						

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DER 2017).

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

4. Detailed risk assessment – Leachate of TSF

4.1 TSF leachate

There is potential for groundwater to be impacted by the addition of wastewater discharge through leachate. Wastewater may not only increase the volume of seepage water but may change the geochemical composition of the leachate.

Currently the TSF has two operational cells, Cell A and Cell B. Cell B Stage 8 raise was completed in September 2020, recommissioned in October 2020 and expected to reach capacity in May 2021. Cell A Stage 9 raise is currently in progress. The cell will be recommissioned in June 2021 and expected to reach capacity in November 2021. Both cells have several lifts left in future years.

4.2 Applicant controls

In order to support the application and demonstrate that no adverse impacts will occur from the discharge of wastewater to the TSF, a TSF water balance review was calculated to include the wastewater volumes. The model has been based on existing tailings behaviour which shows that the facility is operating as per original design. Current operating tailings solids are 59%. Table 6 shows the predicted water percentage of effluent in slurry if all of the treated effluent from the wastewater treatment plant is discharged to the TSF.

Table 6: Treated effluent into TSF

	Treated effluent (m ³)	Water in tailings slurry (m ³)	Effluent/Water in slurry (%)
Cell B Stage 8 (8 months)	29,040	1,344,415	2.2
Cell A Stage 9 (6 months)	22,080	1,008,312	2.2

The results of the model showed that additional effluent inflow will increase decant return (to the plant) from 31% to 33% for Cell A and 28% to 30% for Cell B. The estimated seepage rate will remain similar (464 60 521 m³ per month) as the additional effluent will have negligible impact on the size of the supernatant pond.

4.3 Risk Rating

The consequence of leachate to the groundwater is considered moderate but based on the water balance model provided the likelihood is unlikely. The overall risk rating is therefore Medium. Condition 2.4.1 has been amended to include the TSF as an approved discharge point for the treated effluent. Condition 3.4.1 requires the applicant to monitor volumes of effluent discharged to both the waste rock dump and the TSF.

5. Consultation

Table 7 provides a summary of the consultation undertaken by the department.

Table 7: Consultation

Consultation method	Comments received	Department response
Correspondence sent to the Department of Health (DoH) 10 February 2021	<p>The Approval 113.02 has initially approved for 50kL/day of wastewater and a 5600m² of fenced spray field. However, when the WWTP was upgraded in late 2004 for a hydraulic capacity of 75kL/day, an approval was not sought from DoH.</p> <p>For Approval 82.20, the applicant has only put in an application to install a new separate treatment system to cater for 45kL/day which requires 1.1ha of irrigation area. Therefore, DoH have separately approved the new system to the existing system.</p> <p>DoH have only approved effluent disposal to the sprinkler field on waste dump (snip below) with irrigation field size of the above. Discharge to the TSF was not included in the approval.</p> <p>If the applicant wishes to add in an option to discharge into the TSF, they will need to put in an application to DoH for assessment and approval. If the treated effluent will be re-used for in the milling, a recycling water scheme approval from the DoH may be required.</p>	<p>Noted. Approval under Part V of the EP Act does not negate the need for the Licence Holder to have all relevant approvals in place prior to commencing new activities approved under a Licence amendment at the Premises.</p> <p>The Licence Holder should liaise with DoH to seek required approval under the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>.</p>
Correspondence sent to the Department of Mines, Industry and Resources (DMIRS) 23 February 2021	<p>There are no anticipated issues with the stability of the TSF given the addition of treated effluent. Seepage rates will remain similar and the additional effluent is expected to have negligible impact on the size of the supernatant pond.</p> <p>It is unlikely that a Mining proposal would be considered necessary for the changes proposed, given that no increase in any water storage dams or ponds is proposed under this amendment.</p>	<p>The Delegated Officer notes that there are no perceived issues with TSF stability due to activities proposed under this amendment and that no further approvals are required by DMIRS for activities proposed under this amendment.</p>
Licence Holder was provided with draft amendment 5 April 2021	Refer Appendix 1	Refer Appendix 1

6. 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.

6.1 Summary of amendments

Table 8 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 8: Summary of licence amendments

Condition no.	Amendments
N/A	Licence amended to remove category 85 and replace with category 54 which is the appropriate category for the increased throughput (75m ³ /day to 120m ³ /day). Amended on both cover page and Schedule 2
Premises description and Licence summary	Updated to reflect current premises description
Definitions	Definition of WWTP added
1.3.2	Table 1.3.1 amended to include infrastructure requirements for the new mine dewatering dam.
1.3.5	Table 1.3.2 amended to include WWTP pipeline inspections
1.3.11	Table 1.3.5 amended to add installation requirements for the two new fixed film reactor tanks and submersible pumps. Infrastructure and equipment requirements added for the new mine dewatering dam.
2.4.1	Amended to include TSF as discharge point for treated wastewater
3.4.1	Process monitoring added to the licence to ensure volumes of treated effluent discharged to waste dump or TSF are recorded
4.2.1	Reporting condition amended to include new process monitoring requirements. Note 1 updated to specify that the forms specified in Table 4.2.1 (Annual Audit Compliance Report) are available on the department's website.
Schedule 1	Figure 2 has been updated to show the new saline dewatering dam location
Schedule 1	Figure 8 has been added to depict pipelines from WWTP to Eastern Waste Dump and TSF discharge locations.
Schedule 1	Figure 9 has been added to show the existing wastewater treatment plant and the two new fixed film reactor tanks.

References

1. Department of Environment Regulation (DER) 2016, *Guideline: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guideline: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Saracen Metals Pty Ltd 2020, *Application Form*, 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
Page 1	The applicant has requested an update to the name and address of company.	The name and address has been updated. As there is no change to the ACN, this is not considered a transfer.
Page 4	The applicant has provided an updated premises description	The premises description has been updated
Page 6	The applicant has included works approvals W5794/2015/1 and W6181/2018/1 to the instrument log	The instrument log has been updated to include W5794/2015/1 and W6181/2018/1
Table 1.3.1	The applicant has requested removal to reference Mine Dewatering Dam Thunderbox. This dam has been enveloped within the pit footprint and therefore no longer exists.	The dam has been removed from the Table 1.3.1
Table 1.3.5	The applicant has notified the department that Mine Dewatering Dam 2 has been constructed and is compliance with condition 1.3.13 and Table 1.3.5. The applicant has submitted a compliance certificate with the comments.	The compliance certificate shows compliance has been achieved with the requirements listed in Table 1.3.5 for Mine Dewatering Dam 2. This has now been removed from Table 1.3.5.
1.3.15	Condition 1.3.13 states that the License Holder should submit construction compliance documents following construction of infrastructure listed in Table 1.3.5. However, Table 1.3.5 doesn't include TSF infrastructure. The applicant has queried whether the table should include TSF infrastructure.	Table 1.3.5 was amended in Amendment Notice 1 and Amendment Notice 2 of L7815/2001/11 to include Stage 6 TSF embankment raise and modified Cell A and Cell B design. The compliance certificate for the Stage 6 embankment raise to TSF Cell A in April 2018 with further compliance documentation submitted in June 2019 confirming compliance with all requirements specified in Table 1.3.5 regarding the Stage 6 modified Cell A and Cell B design. The department confirmed conditions 1.3.12, 1.3.13 and 1.3.14 had been met. Therefore, Table 1.3.5 does not require TSF infrastructure to be included. Conditions 1.3.14 and 1.3.15 have now been removed as they are redundant.
2.3	The applicant has requested this condition be removed due to the	The licence holder will be required to submit an amendment application for this proposed change to the licence. A risk

Condition	Summary of Licence Holder's comment	Department's response
	affected area being classified as 'Not Contaminated – Restricted Use' by the Contaminated Sites Branch in 2019.	assessment is required to consider the request to remove the condition. As this proposed change was not outlined in the original application and raised at this late stage, it will not be considered as part of this amendment.
Maps	Several updated maps have been provided by the applicant.	All maps provided by the applicant have been added to Schedule 1.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)											
Application type											
Amendment to licence	☒	Current licence number:	L7815/2001/11								
		Relevant works approval number:		N/A	<input type="checkbox"/>						
Date application received		3 September 2020									
Applicant and Premises details											
Applicant name/s (full legal name/s)		Saracen Metals Pty Ltd									
Premises name		North Eastern Goldfields Operations									
Premises location		Mining tenement M36/599									
Local Government Authority		Shire of Leonora									
Application documents											
HPCM file reference number:		2012/006911-1~3									
Key application documents (additional to application form):		Application form Licence Amendment 7815 Attachment 2 TBO_DWER WWT Discharge Areas									
Scope of application/assessment											
Summary of proposed activities or changes to existing operations.	<p>Operation of WWTP</p> <p>Saracen wish to change cat 85 to 54 with new maximum throughput of 120m3/day to cater for an additional 180 rooms at the Thunderbox Village. Discharge to be to the approved eastern waste dump or to the tailings storage facility.</p> <p>Additional saline dewatering dam to be constructed by the Thunderbox pit.</p>										
Category number/s (activities that cause the premises to become prescribed premises)											
Table 1: Prescribed premises categories <table border="1"> <thead> <tr> <th>Prescribed premises category and description</th> <th>Assessed production or design capacity</th> <th>Proposed changes to the production or design capacity</th> </tr> </thead> <tbody> <tr> <td>Category 85: sewage facility</td> <td>70m3/day</td> <td>120m3/day (switching to category 54)</td> </tr> </tbody> </table>						Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity	Category 85: sewage facility	70m3/day	120m3/day (switching to category 54)
Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity									
Category 85: sewage facility	70m3/day	120m3/day (switching to category 54)									
Legislative context and other approvals											
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>								
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Ministerial statement No: EPA Report No:								

Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: DoH and LGA approval granted
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Licence/permit No: 158766
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Mining Act
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Classification: remediated for restricted use (RRU) Date of classification: 23/10/2019