



Application for Licence Amendment

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

Licence Number	L7969/2004/3
Licence Holder	Black Cat (Paulsens Pty Ltd)
ACN	657 781 194
File Number	DER2013/000991-1~4 Paulsen's Gold Operation Mining Leases M08/99 and M08/196 Nanutarra-Munjina Road PARABURDOO WA 6754 As defined by the Premises maps attached to the Revised Licence
Date of Report	29 July 2024
Decision	Revised licence granted

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1. Decision summary

Licence L7969/2004/3 is held by Black Cat (Paulsens) Pty Ltd (Licence Holder) for the Paulsens Gold Operation (the Premises), located on mining leases M08/99 and M08/196.

This Amendment Report documents the assessment of potential risks to the environment from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L7969/2004/3 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 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 8 May 2024, the Licence Holder submitted an application to the department to amend Licence L7969/2004/3 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The Licence Holder seeks to alter the existing location of Genset A5 at Power Station 1 to avoid the powerline corridor and reinstall Genset A1- A4.

This amendment is limited only to changes to Category 52 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 5, 63, 64 and 85 have been requested by the Licence Holder.

2.2.1 Alteration of Genset A5 placement

PS1 is currently licenced for the operation of five diesel engines, as shown in Figure 3, with an emission point height set at 4 m as per L7969/2004/3. When Paulsens Gold Operation transitioned into a state of care and maintenance back in 2017, PS1 underwent decommissioning, leading to the removal of all diesel engines. Simultaneously, the powerlines associated with PS1 were disconnected, and the site's power supply was exclusively provided by Power Station 2 (PS2). Consequently, a segment of new powerlines was erected above the PS1 infrastructure. During the period of care and maintenance the Gensets remained on the current licence.

In preparation for recommencing operations, the site's power equipment and service provider have advised that these overhead powerlines must be buried. By burying the powerlines, the site will revert to its original layout.

To bury the powerlines, Black Cat must reconfigure the current arrangement of the gensets, relocating Genset A5 to a position directly south of Genset A4 upon the installation of the new gensets. The forthcoming gensets will boast a capacity of 1100kVA, be self-bunded, and maintain an emission point height of 4 m. These gensets will be prefabricated offsite, transported to the location via truck, and then lifted into place for installation.

The infrastructure associated with gensets at PS1, as indicated in pre-2024 configuration, was removed during the period of care and maintenance. Figure 1 provides a current approved layout of the Gensets and the new proposed location of the A5 Genset. PS1, upon installation, will continue to operate within the electrical power generation capacity stipulated by the current

licence approval.

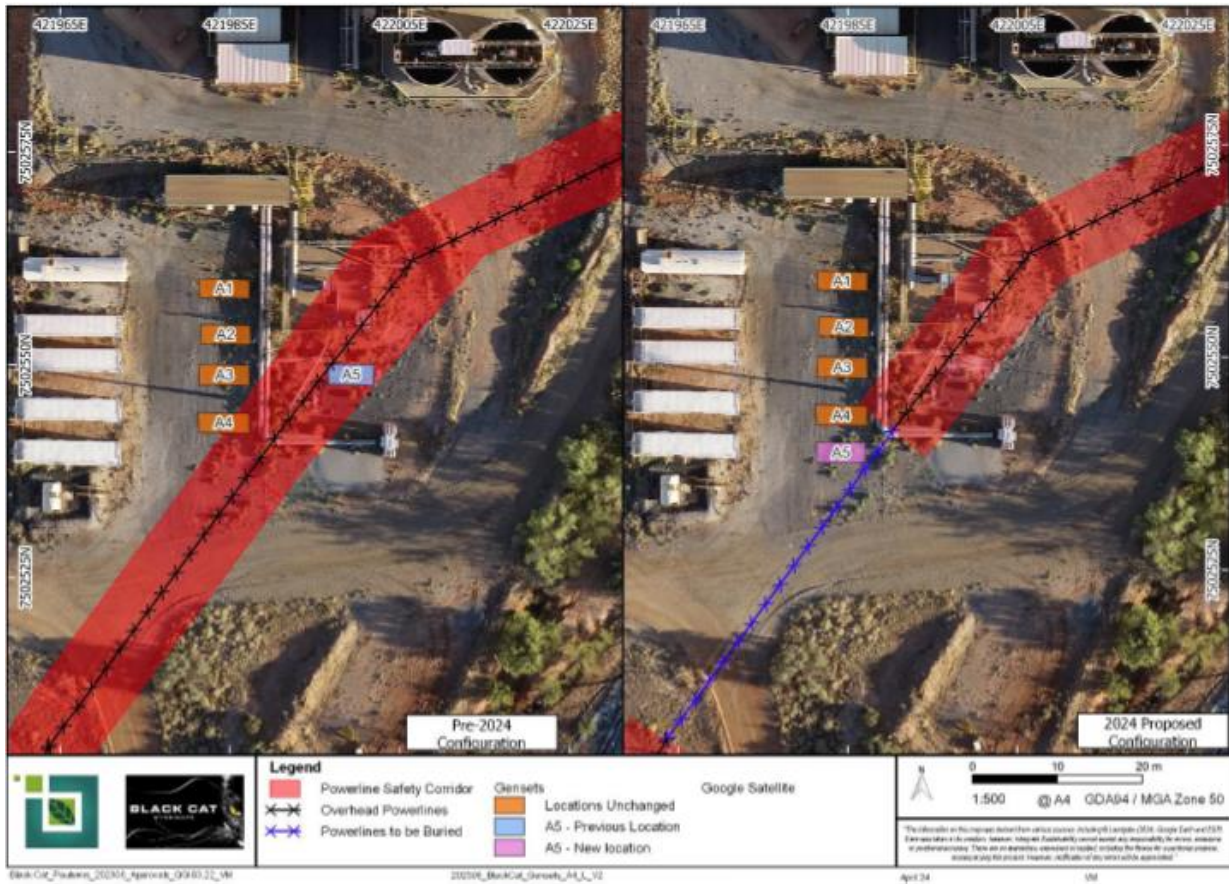


Figure 1: Current Configuration and Proposed Configuration

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 1 below.

Table 1 also details the proposed 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
Exhaust from relocated Genset A5	Genset	Emissions to air	As per L7969/2004/3, Emission point height must remain at 4 m

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 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
<p>Aboriginal and heritage sites located within the premises:</p> <ul style="list-style-type: none"> Jirtilkanku Hill (19,036) Jirtilkanku Camping Ground (19,037) PAULSEN'S SITE 2 (18693) SBM-01 Artefact Scatter (19,044) SBM-02 Artefact Scatter (19,045) SBM-03 Artefact Scatter (19,046) SBM-04 Artefact Scatter (19,047) SBM-05 Artefact Scatter (19,048) SBM-06 Artefact Scatter (19,049) SBM-07 Artefact Scatter (19,050) SBM-08 Artefact Scatter (19,051) Kurtjirli Creek (19,042) – stored data/not a site 	<ul style="list-style-type: none"> Jirtilkanku Hill is a mythological site that covers the whole L7969/2004/3 premises; and The closest registered site to the proposed works is SBM-01 Artefact Scatter (19,044) located approximately 76 m south of the proposed works.
<p>Pastoral stations:</p> <ul style="list-style-type: none"> Mt Stuart Station Wyloo Station 	<ul style="list-style-type: none"> Mt Stuart overlaps entire premises Wyloo station boundary 5km east of the premises Both homesteads are greater than 3km from works. <p><i>Receptor screen out of assessment due to separation distance.</i></p>
Environmental receptors	Distance from prescribed activity
Remnant native vegetation	<ul style="list-style-type: none"> No threatened or priority flora has been recorded within the Premises. Remnant vegetation located approximately 30 m from new Genset Location. Vegetation surrounding PS1 is highly degraded.

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 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 L7969/2004/3 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. Category 52 activities.

The conditions in the Revised Licence 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

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				
Installation of Genset A5 and reinstallation of A1-A4	Dust	Air/windborne pathway causing impacts to health and amenity	Aboriginal Heritage sites Native vegetation	Refer to Section 3.1.1	C = Slight L = Rare Low Risk	Y	N/A	Due to the nature and distance to receptors and short time period of installation the risk is considered low and no conditions have been specified on the amended licence. Further, due to the distance to receptors, the Delegated Officer does not consider that the operation of the A5 genset in the revised location will change the assessed risk profile at the premises associated with air emissions from the stack. Therefore, existing controls are considered sufficient to mitigate the risk of emissions from this source.

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

Table 4: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 12 July 2024.	Upgrades to existing fuel tanks originally proposed as part of this licence amendment are no longer required, given Black Cat has received confirmation that the existing fuel tanks can be re used.	Risk assessment for new fuel tanks removed from this Decision Report.

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 5 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 5: Summary of licence amendments

Condition no.	Proposed amendments
Figure 4	Power Station 1 emission point map updated
Figure 6	Addition of fuel tank layout figure

References

1. Black Cat Pty Ltd, (2024) *Supporting Information for Licence (L7969/2004/3) Amendment to allow for the recommencement of mining at Paulsens Gold Operation*. West Perth, Western Australia.
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.