



## Department initiated Amendment

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

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<b>Licence Number</b>	L8457/2010/2
<b>Licence Holder</b>	Silver Lake (Integra) Pty Limited
<b>ACN</b>	093 278 436
<b>File Number</b>	2012/006865-1~5
<b>Premises</b>	Salt Creek Processing Facility  Mount Monger Road EMU FLAT WA 6431  Legal description –  Mining Tenements M25/71, M25/125, M25/133, M25/307, M25/347  General Purpose Lease L25/27, L25/31, L25/33, L25/41  Miscellaneous Licence G25/02  As defined by the Premises maps attached to the Revised Licence
<b>Date of Report</b>	29 August 2022
<b>Decision</b>	Revised licence granted

**A/MANAGER, RESOURCE INDUSTRIES  
REGULATORY SERVICES**

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

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## 1. Decision summary

Licence L8457/2010/2 is held by Silver Lake (Integra) Pty Limited (Licence Holder) for the Salt Creek Processing Facility (the Premises), located on mining tenements M25/71, M25/125, M25/133, M25/307, M25/347, general purposes leases L25/27, L25/31, L25/33, L25/41 and miscellaneous licence G25/02.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during operation of the Premises. As a result of this assessment, Revised Licence L8457/2010/2 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 Background

On 21 July 2022, the Licence Holder informed the department of several typological errors and unclear conditions that were present in the licence, which was recently amended on 1 July 2022 (DWERDT634846).

Furthermore, there was an apparent misunderstanding between the department and the Licence Holder on the purpose and construction design of piezometer NMB05. NMB05 was initially proposed by the Licence Holder as a shallow standpipe piezometer, which would be installed within the seepage recovery drain to monitor the efficacy of the drain in intercepting seepage from the nearby TSF2. As such, the proposed depth of NMB05 would be 4.5 mbgl – the same depth as the seepage recovery drain.

Due to the location of the seepage recovery drain, piezometer NMB05 was proposed to replace monitoring bore MB001 (i.e., located hydraulically upgradient of the drain) as the ambient groundwater monitoring bore in that portion of TSF2. Consequently, MB001 would not be monitored, except for standing water level (SWL) with no imposed SWL limit.

As part of the previous amendment, the department assessed the information pertaining to NMB05 and found that piezometer was not an adequate replacement compliance monitoring point for MB001. Instead, a monitoring bore would need to be constructed hydraulically downgradient of the seepage recovery drain. Further information is available in Appendix 1 of the Amendment Report (issued 1 July 2022; DWER 2022).

In the amended licence, the monitoring bore (NMB05) was intended to replace the piezometer. Nevertheless, the Licence Holder has subsequently expressed the importance of installing a piezometer within the seepage recovery drain, in addition to the monitoring bore.

### 2.3 Amendment summary

On 28 July 2022, the department initiated an amendment to licence L8457/2010/2 to address the errors and incorporate the changes discussed, including:

- Rename 'SRD1' to Seepage Recovery Drain';
- Correct typological error in the 'Infrastructure' description of Table 8 to clarify location of monitoring bore NMB06;
- Include the construction and SWL monitoring of a standpipe piezometer located within

the seepage recovery drain (now named 'NMB05');

- Extend the timeframe for the construction of monitoring bore NMB06 by eight weeks (i.e., two months).

Additionally, in providing comments to the draft licence amendment (refer to Appendix 1), the Licence Holder has also requested to:

- Extend the construction timeframe for the seepage recovery drain and standpipe piezometer NMB05 by eight weeks (i.e., two months), which will align with the timeframe for the installation of monitoring bore NMB06;
- Remove monitoring bore NMB01 from Table 7 of the licence, as it will likely be destroyed as part of construction works for the seepage recovery drain.

The rationale for these additional changes is due to the need for larger earthmoving machinery, including a dozer, which has delayed the works (i.e., extension request) and led to a larger disturbance footprint (i.e., MB001 as collateral damage).

The department considers the decommissioning of monitoring bore MB001 to be acceptable for the following reasons:

- The location of the seepage recovery drain has resulted in monitoring bore MB001 to be an inadequate compliance monitoring point as it is located hydraulically upgradient of the seepage control infrastructure;
- The groundwater bore network coverage in the area is adequately preserved with the construction of standpipe piezometer NMB05 and replacement monitoring bore NMB06. The latter of which was initially meant to act as an alternate compliance monitoring point to MB001.

### 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.

Relevant source-pathway-receptor linkages were previously identified in the previous licence amendment. The risk ratings for these linkages and associated conditions were determined, in accordance with the *Guideline: Risk assessments* (DWER 2020) and *Guideline Statement: Setting Conditions* (DWER 2015), respectively.

The scope of this department-initiated amendment is not considered to have altered the outcomes of the previous risk assessment, which is presented in the Amendment Report for L8457/2010/1, issued on 1 July 2022 (DWER 2022).

### 4. Consultation

Table 1 provides a summary of the consultation undertaken by the department.

**Table 1: Consultation**

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 9 August 2022.	Refer to Appendix 1.	Refer to Appendix 1.

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 5.1 Summary of amendments

Table 2 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 2: Summary of licence amendments**

Condition no.	Proposed amendments
---	Updated Licence History table.
Condition 3	Updated Table 2 to: <ul style="list-style-type: none"> <li>• Specify construction of piezometer NMB05; and</li> <li>• Extend timeframe of seepage recovery drain and piezometer NMB05 by two months.</li> </ul>
Condition 17	Updated Table 7 to: <ul style="list-style-type: none"> <li>• Remove MB001;</li> <li>• Rename SRD1 to Seepage Recovery Drain and removal of limit for WAD CN;</li> <li>• Rename new monitoring bore from NMB05 to NMB06; and</li> <li>• Addition of piezometer NMB05 for monitoring standing water level (with no limit).</li> </ul>
Condition 18	Updated Table 8 to: <ul style="list-style-type: none"> <li>• Rename monitoring bore from NMB05 to NMB06;</li> <li>• Clarify location of bore; and</li> <li>• Extend timeframe for installation by two months.</li> </ul>
---	Updated Schedule 1: Figure 3 to clarify location of Seepage Recovery Drain monitoring location. Updated Schedule 1: Figure 7 to include construction details for piezometer NMB05.

## 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: Risk Assessments*, Perth, Western Australia.
3. DWER 2022, *Amendment Report – Application for Licence Amendment (L8457/2010/2)*, Perth, Western Australia.

## 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 3	Licence Holder requested a timeframe extension from 1 October 2022 to 1 December 2022 for the construction of relevant infrastructure in Table 2 (i.e., seepage recovery drain).	The department considers the proposed change to be acceptable due to the short timeframe extension being sought.  Timeframe extended to 1 December 2022.
Condition 17	Licence Holder requested for monitoring bore MB001 to be removed from Table 7 as it will be destroyed as collateral damage for the construction of the seepage recovery drain.  Licence Holder considers the removal of MB001 to be low risk, as there are nearby monitoring locations (i.e., NMB05 and NMB06 for standing water level, and NMB06 for ambient water quality).	The department has no issues with this proposed change and found the rationale provided acceptable.  Monitoring bore MB001 was removed from Table 7.
Condition 18	Licence Holder requested a timeframe extension from 1 October 2022 to 1 December 2022 for the construction of relevant infrastructure in Table 2 (i.e., seepage recovery drain).  Licence Holder provided an identifier for the new bore (i.e., NMB06), as well as coordinates (N=6558326.8, E=406282.2) and an updated figure.	The department considers the proposed change to be acceptable due to the short timeframe extension being sought.  Further, the department has included the information provided in the amended licence.