



## Application for Licence Amendment

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

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<b>Licence Number</b>	L8562/2011/1
<b>Licence Holder</b>	Pilbara Iron Company (Services) Pty Ltd
<b>ACN</b>	107 210 248
<b>File Number</b>	DER2014/000869-1
<b>Premises</b>	Gudai-Darri Iron Ore Mine  L47/00701, AL70/00007 (L7SA), AML70/00252 (ML252SA), L47/00648, L47/00682, L47/00849, L47/00912 and L47/00768.  As defined by the coordinates in Schedule 1 of the Revised Licence
<b>Date of Report</b>	5 May 2023
<b>Decision</b>	Revised licence granted

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

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## 1. Decision summary

Licence L8562/2011/1 is held by Pilbara Iron Company (Services) Pty Ltd (previously Hamersley Iron Pty Ltd) (Licence Holder) for the Gudai-Darri Iron Ore Mine (previously Koodaideri Exploration Camp) (the Premises), located at mining tenement ML252SA and miscellaneous licences L70/00007, L47/00648, L47/00682, L47/00701, L47/00768, L47/00849, and L47/00912.

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 construction and operation of the Premises. As a result of this assessment, Revised Licence L8562/2011/1 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 11 January 2023, the Licence Holder submitted an application to the department to amend Licence L8562/2011/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- inclusion of constructed and commissioned (if required) infrastructure under works approval W6221/2019/1, W6622/2021/1, and W6520/2021/1;
- update the operational prescribed premises boundary as required under works approval W6622/2021/1 and W6520/2021/1;
- conditions imposed for the flexibility in nominated locations of proposed additional landfill sites within the prescribed premises boundary that would meet specified design and management conditions / criteria;
- update the premises name and licence holder; and
- administrative changes.

This amendment includes the addition of two new categories. Category 5 added to the Licence includes the main processing infrastructure constructed under W6221/2019/1 and the Build Own Operate (BOO) Plant constructed under W6520/2021/1, as well as a Class II putrescible landfill site (existing Category 64). Category 73 added to the Licence includes the fuel and chemical storage facilities constructed under W6622/2021/1. Table 1 outlines the proposed changes to the existing Licence.

**Table 1: Proposed throughput capacity changes**

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
Category 5: Processing or beneficiation of metallic or non-metallic ore	-	53 million tonnes per year	New category to the Licence
Category 54: Sewage facility	558 cubic metres per day	-	No change to throughput capacity
Category 64: Class II putrescible landfill site	20,000 tonnes per year	-	Addition of a landfill site, but no change to throughput capacity.  Nominated waste rock dump (WRD) and Low-grade ore stockpile locations be approved as future landfill sites for Class I and II landfill material.
Category 73: Bulk storage of chemicals etc	-	1,530 cubic metres in aggregate	New category to 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 *Guideline: Risk assessments* (DWER 2020a).

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 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
<b>Construction</b>			
<b>Category 64</b>			
Dust	Construction of landfill sites	Air/windborne pathway	<ul style="list-style-type: none"> <li>refer to section 3.1.2 of the construction requirements for landfill sites</li> </ul>
<b>Operation</b>			
<b>Category 5</b>			
Contaminated / sediment laden stormwater	Operation of processing and / or crushing equipment infrastructure	Rainwater from storm events ingress with iron ore, hydrocarbons, and chemicals within the processing area	<ul style="list-style-type: none"> <li>operate and maintain stormwater drain system and sedimentation ponds</li> <li>operate and maintain stormwater diversion levees and drains</li> <li>concrete sumps are to be maintained to collect wash down water from conveyors</li> <li>drive in sumps and silt traps are to be maintained</li> </ul>
Discharge of contaminants to land (e.g., hydrocarbon spillage from filling)	Operation of heavy machinery – hydrocarbons (fuel and oil products)	Seepage / spillage	<ul style="list-style-type: none"> <li>oily water collection pumps and separators will be operated and maintained</li> <li>vehicle refuelling points are located on bunded concrete hardstand / bunded lined earthen pad</li> <li>concrete sumps are to be maintained to collect wash down water from conveyors</li> <li>spill response equipment available at all refuelling locations on site</li> <li>general provisions of the EP Act and also the <i>Environmental Protection (Unauthorised discharges) Regulations 2004</i> apply</li> </ul>
Direct spillage from refuelling equipment and vehicles			
Sediment laden and/or contaminated stormwater to surface and/or groundwater		Overland runoff Infiltration from soils to groundwater	<ul style="list-style-type: none"> <li>operate and maintain stormwater diversion levees and drains</li> <li>concrete sumps are to be maintained to collect wash down water from conveyors</li> <li>drive in sumps and silt traps are to be maintained</li> <li>operate and maintain stormwater drain system and sedimentation ponds</li> </ul>
<b>Category 64</b>			
Contaminated / sediment laden stormwater	Disposal of wastes to landfill sites	Overland runoff Infiltration from soils to groundwater	<ul style="list-style-type: none"> <li>refer to section 3.1.2 of the operational controls for landfill sites</li> <li>existing controls as per Licence L8562/2011/1 apply</li> </ul>
Leachate		Infiltration from soils to groundwater Contamination of soils and groundwater	
Windblown waste		Air / windborne pathway	
<b>Category 73</b>			
Discharge of contaminants to land (e.g., hydrocarbon)	Operation of hydrocarbon storage	Seepage / spillage	<ul style="list-style-type: none"> <li>visual inspections of piping below ground at the pits for any leaks</li> </ul>

Emission	Sources	Potential pathways	Proposed controls
spillage from filling)	facilities		<ul style="list-style-type: none"> <li>spill response equipment available at all bulk hydrocarbon storage locations on site</li> <li>weekly visual inspections of tank integrity and potential leaks / damage to associated infrastructure</li> <li>general provisions of the <i>Environmental Protection (Unauthorised discharges) Regulations 2004</i> apply</li> </ul>
Direct spillage from refuelling equipment and vehicles			<ul style="list-style-type: none"> <li>refuelling from mobile fuel trucks for field-based machinery and using a drip tray at the transfer point</li> <li>vehicle refuelling to occur over compacted, lined earthen par / concrete hardstand area</li> <li>spill response equipment available at all refuelling locations on site</li> <li>general provisions of the <i>Environmental Protection (Unauthorised discharges) Regulations 2004</i> apply</li> </ul>
Sediment laden and/or contaminated stormwater to surface and/or groundwater		Overland runoff Infiltration from soils to groundwater	<ul style="list-style-type: none"> <li>there will be no planned discharge of water from site</li> <li>potentially contaminated water will be managed onsite via bunds and surface water diversions around the facilities</li> <li>general provisions of the EP Act and also the <i>Environmental Protection (Unauthorised discharges) Regulations 2004</i> apply</li> </ul>

### 3.1.2 Additional landfill sites design and management conditions / criteria

The Licence Holder has requested condition/s to authorise construction of future landfill sites within the prescribed premises boundary. The Licence Holder has provided design and management conditions / criteria as follows:

- landfill sites will be located within the prescribed premises boundary;
- be established at a location so that a minimum distance of 3 m is maintained between the depth of excavated cells and/or trenches and the water table;
- landfill sites will not be located within an Environmentally Sensitive Area;
- landfill sites will be located more than 100 m from any permanent or perennial watercourse;
- landfill sites will be located so that vertical distance between the waste and the highest seasonal and expected post mining ground water level is no less than 3 m (inert landfill) or 10 m (putrescible landfill);
- putrescible landfill sites will be fenced to an appropriate height, gated and locked to minimise unauthorised access and windblown waste;
- fencing surrounding the perimeter of putrescible landfill sites will be regularly inspected for damage and cleared of waste;
- landfill sites will include a sign which clearly defines what waste is accepted;
- landfill sites will have a firebreak at least 3 m in width around the boundary;
- surface water management structures (i.e., bunding) will divert surface water flows away

from landfill sites;

- a sump or bunding will collect any surface water that has come into contact with waste;
- tipping area of putrescible landfill sites will not be greater than 30 m in length and 2 m above ground level height;
- waste in putrescible landfill sites will be covered weekly to at least 200 mm so that no waste is left exposed (including at final landform design); and
- waste in inert landfill sites will be covered on an ad-hoc basis when required, to at least 200mm at final landform design.

Section 3.2 provides the risk assessment of potential emissions and discharges from the premises during the construction and operation of category 64 landfill sites under the Figure 2, Schedule 1 maps within the Licence L8562/2011/1.

### 3.1.3 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020a), 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 environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020b)). No nearby human receptors occur within 5 km of the prescribed premises boundary. Environmental sensitive receptors are distances from the prescribed activities are shown in Figure 1.

**Table 3: Sensitive environmental receptors and distance from prescribed activities**

Environmental receptors	Distance from prescribed activity
Priority Ecological Community (PEC) and nationally important wetland <i>Fortescue Marsh P1</i>	Approximately 5.7 km north-east from proposed prescribed premises boundary.
Threatened (T) / Priority (P) fauna 1. Northern Quoll ( <i>Dasyurus hallucatus</i> ) Endangered 2. Grey Falcon ( <i>Falco hypoleucos</i> ) Vulnerable 3. Ghost Bat ( <i>Macroderma gigas</i> ) Vulnerable 4. Pilbara Leaf-nosed Bat ( <i>Rhinonictis aurantia</i> (Pilbara form)) Vulnerable 5. Pilbara Olive Python ( <i>Liasis olivaceus barroni</i> ) Vulnerable 6. Western Pebble-mound Mouse ( <i>Pseudomys chapmani</i> ) P4 7. Peregrine Falcon ( <i>Falco peregrinus</i> ) Other Specially Protected	All conservation significant fauna species recorded within the proposed prescribed premises boundary.  Relevant Ministerial Statement (MS) 999 conditions apply for the Pilbara Leaf-nosed Bat and Northern Quoll.
Other fauna	Troglifauna exclusion zone has been imposed
T / P flora 1. <i>Synostemon hamersleyensis</i> P1. 2. <i>Rostelluria adscendens</i> var. <i>latifolia</i> P3 3. <i>Sida</i> sp. Barlee Range (S. van Leeuwen 1642) P3. 4. <i>Themeda</i> sp. Hamersley Station (M.E. Trudgen	All conservation significant flora species recorded within the proposed prescribed premises boundary.  Relevant MS 999 conditions apply for <i>Lepidium catapycnon</i> P4 and <i>Synostemon</i>

Environmental receptors	Distance from prescribed activity
11431) P3 5. <i>Eremophila magnifica</i> subsp. <i>magnifica</i> P4 6. <i>Lepidium catapycnon</i> P4 7. <i>Rhynchosia bungarensis</i> P4	<i>hamerselyensis</i> P1.
Registered aboriginal heritage sites	Multiple heritage sites occur within the proposed prescribed premises boundary, 22 registered sites and 17 lodged heritage sites.
Underlying groundwater	Variable in depth, but typically 70 metres below ground level.  Groundwater expected to generally flow northwards.  No pastoral bores in use are located within 5 km of operational infrastructure.
Hydrology <i>Gudai-Darri Spring Gorge</i> (Potential GDE/GDE Tier 2)	Approximately 2 km south-east from the In-Pit HME Fuel Facility and 4 km from main infrastructure.  Relevant MS 999 conditions apply that includes an exclusion zone around the spring and an adaptive management plan to ensure no adverse changes to hydrology.  Unnamed ephemeral creeks within the proposed prescribed premises boundary.



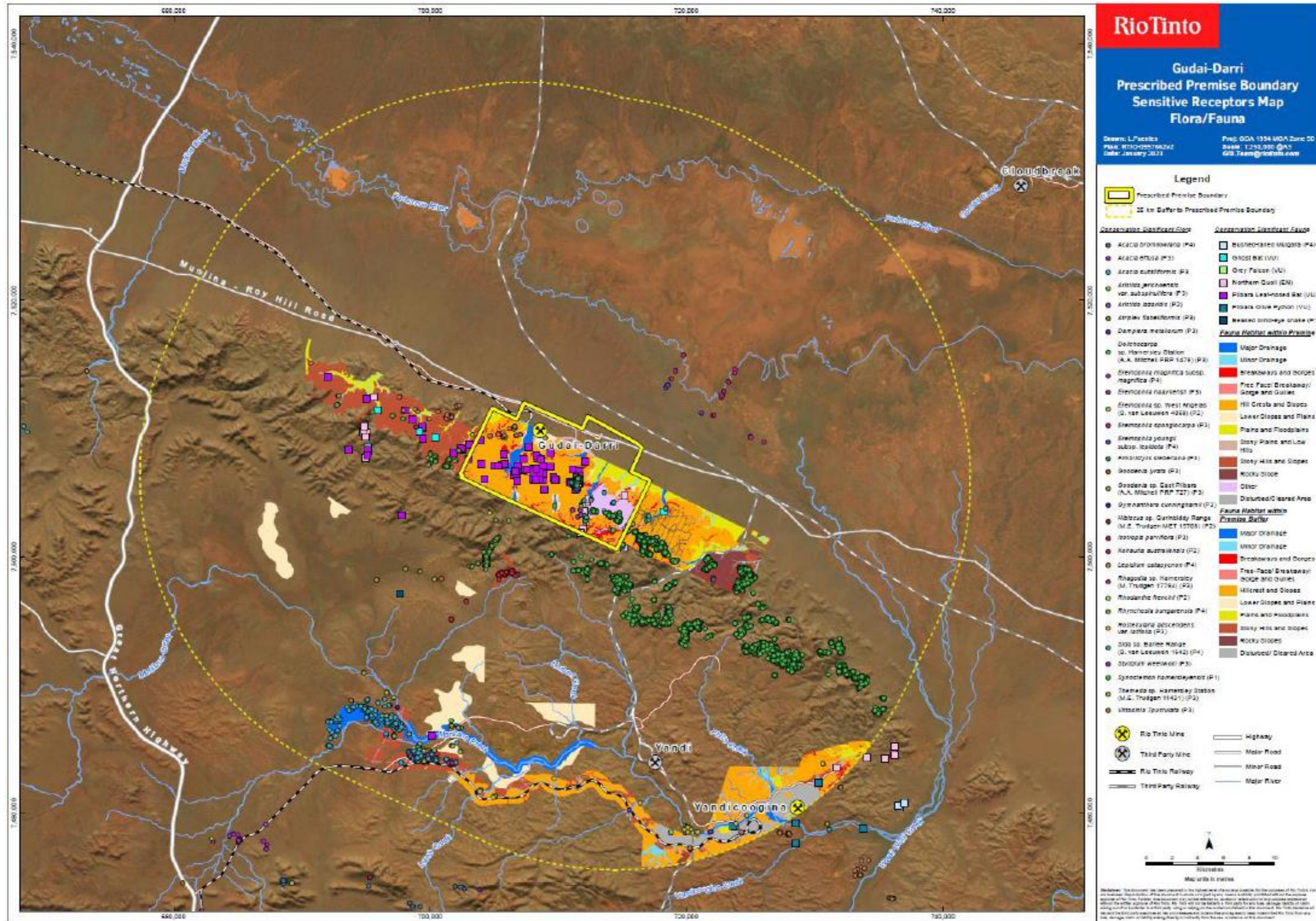


Figure 1: Distance to sensitive receptors

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## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020a) 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 L8562/2011/1 that accompanies this Amendment Report authorises emissions associated with the construction and 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 construction and operation**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Construction</b>								
<b>Category 64</b>								
Construction of landfill sites	Dust	Air/ windborne pathway causing impacts to photosynthesis of nearby vegetation	Nearby vegetation, particularly priority flora	Refer to section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	Condition 1,15, <b>19</b> , and 20	N/A
<b>Category 5</b>								
Operation of processing and / or crushing equipment infrastructure	Contaminated / sediment laden stormwater	Rainwater from storm events ingress with iron ore, hydrocarbons and chemicals within the processing area impacting on sensitive features	Nearby vegetation, particularly priority flora Soil Surface water – ephemeral creeks Groundwater	Refer to section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 13, 14, <b>19, 20</b> , and 21	Condition 19 included for all operational requirements for the items of infrastructure, with exception to the WWTPs. Condition 20 includes a Table listing specific reporting requirements to be provide in the Annual Environmental Report.
Operation of heavy machinery – hydrocarbons (fuel and oil products)	Discharge of contaminants to land (e.g., hydrocarbon spillage from filling)	Seepage / spillage causing ecosystem disturbance / soil contamination		Refer to section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Conditions <b>19</b> , <b>20</b> , and 21	Refer above for conditions 19 and 20.
	Direct spillage from refuelling equipment and vehicles			Refer to section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Conditions <b>18</b> , <b>19</b> , and 20	Refer above for conditions 19 and 20.
	Sediment laden and/or contaminated stormwater to surface and/or groundwater	Overland runoff potentially causing ecosystem disturbance and surface water	Refer to section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 13, 14, <b>19, 20</b> , and 21	Refer above for conditions 19 and 20.	

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Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
		contamination Infiltration from soils to groundwater						
<b>Category 64</b>								
Disposal of wastes to landfill sites	Contaminated / sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance and surface water contamination Infiltration from soils to groundwater	Nearby vegetation, particularly priority flora Soil Surface water – ephemeral creeks Groundwater	Refer to section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 13, 14, <b>19, 20,</b> and 21	Refer above for conditions 19 and 20.
	Leachate	Infiltration from soils to groundwater during the wet season Contamination of soils and groundwater	Surface water (Gudai-Darri Spring Gorge) Soils Groundwater	Refer to section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Conditions <b>19, 20,</b> and 21	Refer above for conditions 19 and 20.
	Windblown waste and dust	Air / windborne pathway causing potential harm to native fauna and livestock (ingestion)	Nearby native fauna and livestock	Refer to section 3.1	C = Minor L = Rare <b>Low Risk</b>	Y	Conditions <b>19, 20,</b> and 21	Refer above for conditions 19 and 20.
<b>Category 73</b>								
Operation of hydrocarbon storage facilities	Discharge of contaminants to land (e.g., hydrocarbon spillage from filling)	Seepage / spillage causing ecosystem disturbance / soil contamination	Nearby vegetation, particularly priority flora Soil	Refer to section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions <b>16, 17, 18, 19, 20,</b> and 21	Conditions 16 to 18 relate to waste management from ancillary operations. Refer above for conditions 19 and 20.

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	Direct spillage from refuelling equipment and vehicles		Surface water – ephemeral creeks Groundwater	Refer to section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions <b><u>16, 17, 18, 19, 20,</u></b> and 21	Refer above for conditions, 16, 17, 18, 19 and 20.
	Sediment laden and/or contaminated stormwater to surface and/or groundwater	Overland runoff potentially causing ecosystem disturbance and surface water contamination Infiltration from soils to groundwater		Refer to section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions 13, 14, <b><u>16, 17, 18, 19, 20,</u></b> and 21	Refer above for conditions, 16, 17, 18, 19 and 20.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020a).

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 28 February 2023	The Applicant's response is detailed in Appendix 1.	The Department's response is provided in Appendix 1.
Licence Holder was provided with a second draft amendment on 12 April 2023	The Applicant had no further comments.	-

## 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
-	Licence holder changed to Pilbara Iron Company (Services) Pty Ltd, previously Hamersley Iron Pty Ltd.
-	ACN has been updated to reflect Licence holder change.
-	Premise details have been updated to Gudai-Darri Iron Ore Mine (previously Koodaideri Exploration Camp) and location as the following: L47/00701, AL70/00007 (L7SA), AML70/00252 (ML252SA), L47/00648, L47/00682, L47/00849, L47/00912 and L47/00768. As defined by the coordinates in Schedule 1 of the Revised Licence
-	Inclusion of the following categories to the Prescribed premises category table: - Category 5: Processing or beneficiation of metallic or non-metallic ore (design capacity of 53 million tonner per year) - Category 73: Bulk storage of chemicals etc (design capacity 1,530 cubic metres in aggregate)
-	Licence history table has been updated.
1, Table 1	Removal of WWTP and associated infrastructure construction requirements as the WWTP has been constructed and Environmental Compliance Reports have been submitted. Removal of the timeframe column under Table 1.

Condition no.	Proposed amendments
	Addition of subsequent landfill sites, design, and construction / installation requirements within the Table. Amended Figure numbers under the 'Location' column and made minor administrative changes.
2	Condition has been revised for the submission of compliance reports related to proposed / subsequent landfill facilities that are to be constructed.
4, 5, and 6	Remove of commissioning conditions for the WWTP as commissioning has been completed and a commissioning report submitted. Removal of table 2: commissioning requirements.
8, Table 2 (previously 11, Table 3)	Amended Table name from Koodaideri Camp to Gudai-Darri Camp Removal of column 3 related to frequency during commissioning.
13 (previously 16)	Inclusion of ' <i>site stormwater diversion levees and drains are maintained</i> ' to the existing condition.
15 (new condition)	Operational requirement previously under condition 19, Table 3, but a new condition was created as dust management is for all infrastructure within the prescribed premises boundary.
16, 17, and 18 (new conditions)	New conditions for waste management from ancillary operations.
18 to 22 (previous conditions)	Conditions have been removed and incorporated into Condition 1, Table 1 (design and construction / installation requirements) and Condition 18, Table 4 (operational requirements).
19, Table 3 (previously 18, Table 3)	New condition to include all operational requirements for the Main processing facilities, BOO Plant, Fuel and chemical (hydrocarbon) storage facilities, and Landfill sites.
20, Table 4	Renumbered condition previously was condition 23 and then 19. Addition of Table 4 to list the conditions and associated reporting requirements to be included in the Annual Environmental Report. Condition reworded to reflect biennial environmental reporting.
21 to 24	Renumbered conditions, previously were conditions 24 to 27.
-	Updated the Definitions Table with new definitions and minor administrative changes.
Figure 1	Updated figure.
Figure 2	New figure of the prescribed premises site layout
Figure 3	Previously figure 2, updated WWTPs and spray field locations.
-	Schedule 2: Premises boundary coordinates amended to from GDA94 to GDA2020.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020a, *Guideline: Risk Assessments*, Perth, Western Australia.
3. DWER 2020b, *Guideline: Environmental Siting*, 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
Licence History	<p>A minor error has been noted in the summary of changes for the licence amendment that occurred on 23/06/2020.</p> <p>Corrected sentence below. Word added shown in red text.</p> <p>"The total capacity of WWTPs onsite will be 558 m<sup>3</sup>/day. This incorporates the current Category 54 capacity of 418.5 m<sup>3</sup>/day, minus 46.5 m<sup>3</sup>/day for the old resource evaluation WWTP which is no longer operational and is to be decommissioned, and addition of the 186 m<sup>3</sup>/day WWTP3".</p>	Amended.
1, Table 1	<p>Infrastructure listed in Table 1 has already been construction and Environmental Compliance Reports (ECRs) have been submitted to DWER (submitted on 19 January 2021). DWER confirmed compliance with conditions 1, 2, 3 of L8562/2011/1 for WWTP3 were met in correspondence dated 21 January 2021.</p> <p>The Licence Holder instead suggests that the operational requirements for the WWTP3, Spray field, Pipelines and Sludge drying beds be added to Condition 18, Table 4.</p> <p>The Licence Holer requests that updates to content relating to Landfill sites are made to align with recently received licences such as L5275/1972/12.</p> <p>The design and construction/installation requirement "tipping area of putrescible landfill sites must not be greater than 30 metres in length and 2 metres above ground level height" is an operational requirement and appears in Table 4.</p> <p>The Licence Holder can confirm that for inert waste and putrescible waste, a cover of at least 200 mm will be achieved at final landform design. Sites where tyres are disposed of will have a final cover of not less than 500 mm as stated in response to Condition 18 below.</p> <p>The location of all landfill sites will by surveyed and their spatial locations (coordinates) recorded. Maps showing the location of any constructed subsequent landfill sites will provide in the Annual Environmental Report.</p> <p>Please note rewording of conditions relating to proposed/subsequent landfill facilities is necessary, as waste that is to be disposed of at the Waste Rock Landform (WRL) and Stockpile locations will be done so without the use of trenches. Only used tyres and rubber products (such as from conveyors) is proposed to be stockpiled and buried at these locations. All waste at the WRL and Stockpile Landfill facilities will be manged as tyre waste (i.e. managed to meet Part 6 of the EP regulations – see response to Condition 18, Table 4).</p> <p>Please remove WWTP3, Spray field, Pipelines and Sludge drying beds from Table 1 and insert in Condition 18 Table 4.</p> <p>Please remove "tipping area of putrescible landfill sites must not be greater than 30 metres in length and 2 metres above ground level height" from Table 1.</p> <p>The following amendments to Table 1 are requested to align with recently received approvals. Please note that the timeframe column is no longer required.</p>	Amended as per the applicant's request.
2 & 3	<p>Given that the only item of infrastructure to remain in Table 1 will be subsequent landfill sites, the requirement for an Environmental Compliance Report to be certified by a suitably qualified engineer seems unwarranted and unnecessary. There are no significant engineering considerations required for the establishment of landfill sites, therefore as constructed plans offer limited value. The Licence Holder requests that the condition be reworded to align with the recently approved Paraburdoo licence (L5275).</p> <p>Requested reword:  <i>"Subject to condition 1, within 28 days of the completion of works specified in Table 1, the Licence Holder must submit to the CEO an Environmental Compliance Report. The compliance document shall:</i>  <i>(i) Certify that the works were constructed in accordance with the conditions of the licence; and</i>  <i>(ii) Be signed by a person authorised to represent the Licence Holder and contain the printed name and position of that person within the company"</i></p>	Condition 2 has been amended as per the applicant's request.
4, 5, & 6	<p>As outlined above, the only item of infrastructure for which ECRs have not been submitted is the subsequent landfill facilities. Given these structures are simple in nature, there are no commissioning requirements. Conditions 4, 5 &amp; 6 are redundant and can be removed.</p> <p>The Licence Holder requests that Condition 4,5 &amp; 6 are removed.</p>	Conditions have been removed.
9, 10, & 11	<p>Given ECRs have been submitted for WWTP2 and WWTP3, Column 3 of Table 3 can be deleted.</p> <p>The Licence Holder requests that Column 3 of Table 3 be deleted.</p>	Column 3 of Table 3 has been removed.
18, Table 4	<p>For the BOO plant infrastructure, the operational requirements column incorrectly lists that the facility cannot process more than 4,950,000 tonnes or iron ore. The throughput of materials will not exceed 10 million tonnes, which is correctly listed in brackets.</p> <p>The operational requirement to follow approval process prior to mobilising chemicals to site should not appear as a requirement for the BOO plant. The Licence Holder suggests this be moved to the Item 3 (Fuel and chemical (hydrocarbon storage facilities))</p> <p>Additional conditions are recommended/requested to ensure tyres are buried in accordance with Part 6 of the Environmental Protection Regulations 1987. Imposing these additional conditions on the licence within Table 4 will ensure site personnel do not have to refer to multiple pieces of legislation and/or instruments.</p> <p>There are multiple landfill sites (existing and proposed) and not all sites will receive putrescible wastes. The Landfill sites proposed within the future WRL/stockpile areas (updated figures provided to clearly show these landfill sites) will only receive inert materials, such as used tyres and rubber conveyor materials that will be stockpiled and buried in accordance with Part 6 on the Environmental Protection Regulations 1987. These areas will not be fenced or have lockable gates, as the type of waste to be stored is heavy and does not attract animals. Access is restricted to RTIO permit holders only as the landfill areas are located within operational areas. To show conditions more clearly for putrescible and inert landfill facilities, amendments to Table 4 are suggested.</p> <p>For Item 1 (Main processing facilities) and Item 2 (BOO Plant) infrastructure, there are several duplicated operational requirements listed that could be removed or reworded. The Licence Holder suggests that general stormwater and dust suppression management requirements be included within Condition 16 or 17, or additional general conditions be added to the licence.</p>	<p>Table 4 has been updated with the applicant's suggestions where appropriate.</p> <p>Amended condition 16 to include the following "site stormwater diversion levees and drains are maintained".</p> <p>Several conditions have been included as per the applicant's request:</p> <p><b>Dust Management</b>  <i>"The licence holder shall monitor the weather forecasts to ensure availability of adequate water carts to</i></p>

Condition	Summary of Licence Holder's comment	Department's response
	<p>For item 4 (Fuel and chemical storage facilities), the infrastructure should be referred to as "Bulk Fuel and Chemical (Hydrocarbon) storage facilities" for increased accuracy. Minor changes to operational requirements are also requested, with general or site wide conditions to be removed. For example, field based machinery refuelling requirements should be a general condition, as it is not related to the bulk fuel and chemical infrastructure. The Licence Holder suggests adding additional general conditions to manage waste/hydrocarbons from ancillary operations or activities.</p> <p>Please remove "No more than 4,950,000 tonnes of iron ore (10 million tonnes per annum)" and replace with "No more than 10 million tonnes per year"</p> <p>Requested additional conditions to be added to the landfill operational requirements section of Table 4:</p> <ul style="list-style-type: none"> <li>- Tyres must be disposed of by burial in batches of no more than 1000 whole tyres separated from each other by at least 100 mm of soil</li> <li>- Tyres must be buried under a final soil cover of not less than 500 mm</li> </ul> <p>Please amend conditions so that lockable gates are only a requirement for areas in which putrescible waste is disposed of.</p> <p>Suggested changes to Table 4 to more clearly show requirements for inert landfill sites (WRL/Stockpile Facilities) and putrescible facilities are outlined below. Please delete operational requirements not listed.</p> <p>Suggested requirements to be removed from Table 4 and added to Condition 16, 17 or new general management conditions be created to capture:</p> <ul style="list-style-type: none"> <li>- Maintain site stormwater diversion levees and drains</li> <li>- Maintain and operate oily water systems as per manufactures specifications</li> <li>- Monitor weather forecasts to ensure availability of adequate water carts to manage dust</li> </ul> <p>New general or Waste Management from Ancillary Operations conditions proposed:</p> <ul style="list-style-type: none"> <li>- Systems are in place to ensure that hydrocarbon contaminated waters are not released to the environment</li> <li>- The licence holder shall utilise and maintain, protective bunding, skimmers, silt traps, neutralisation pits, fuel, and oil traps, drains and sealed collection sumps around operational infrastructure areas to enable recovery of spillages and protection of surrounding soils and groundwater.</li> </ul>	<p><i>manage dust within the prescribed premises boundary."</i></p> <p><b>Waste management from ancillary operations</b>  <i>"The licence holder shall ensure that systems are in place to ensure that hydrocarbon contaminated waters are not released to the environment.</i></p> <p><i>The licence holder shall utilise and maintain protective bunding, skimmers, silt traps, neutralisation pits, fuel, oil traps, drains and sealed collection sumps around operational infrastructure areas to enable recovery of spillages and protection of surrounding soils and groundwater.</i></p> <p><i>The licence holder shall as soon as practicable recover, or remove and dispose of, any liquid resulting from spills or leaks of chemicals including fuel, oil, or other hydrocarbons, to protect surrounding soils, surface water, and groundwater."</i></p>
19, Table 5	<p>The Licence Holder requests that Annual Environmental Reporting requirements align with those recently imposed on L5275/1972/12.</p> <p>Minor updates to content within Condition 19, Table 5 are suggested for clarity and consistency purposes. Given there are no licence limits, exceedances referred to should be related to relevant guideline limits or values for treated effluent.</p> <p>Please amend Table 5 conditions.</p> <p>Please amend condition 19 so that biennial reports are required in place of annual reports.</p>	<p>Amended the wording for condition 19 to reflect biennial reporting of the Annual Environmental Report.</p> <p>Amended Table 5 as per the applicant's request.</p>
Definitions	<p>Please insert the definition for clinical waste into Table 6. This will assist site personnel and avoid the need to refer to the landfill definitions.</p> <p>Please include the below in Table 6 definitions:</p> <p>clinical waste means waste generated by medical, nursing, dental, veterinary, pharmaceutical or other related activity which is poisonous or infectious; likely to cause injury to public health; or contains human tissue or body parts.</p>	<p>Definition included.</p>
Figures	<p>As requested, an additional figure has been provided to show the bulk fuel and chemical storage facilities. The additional figure also shows more clearly where additional landfill facilities will be located on WRLs. Landfill facilities on WRLs will only be used to bury used tyres and rubber products.</p> <p>Please add additional figure to the licence.</p>	<p>The new Figure 2 has been added to the licence.</p>
Risk assessment	<p>The Licence Holder is satisfied with the risk assessment and provides no comments or suggested changes. The Amendment Report will require update to capture any changes made to the draft licence, these changes will mostly be terminology (e.g. WRD changed to WRL).</p>	<p>Noted.</p>

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY				
<b>Application type</b>				
Works approval	<input type="checkbox"/>			
Licence	<input type="checkbox"/>	Relevant works approval number:		None <input type="checkbox"/>
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Date Report received:		
Renewal	<input type="checkbox"/>	Current licence number:		
Amendment to works approval	<input type="checkbox"/>	Current works approval number:		
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L8562/2011/1	
		Relevant works approval number:	W6221/2019/1 W6622/2021/1 W6520/2021/1	N/A <input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None <input type="checkbox"/>
Date application received	11 January 2023			
<b>Applicant and Premises details</b>				
Applicant name/s (full legal name/s)	Pilbara Iron Company (Services) Pty Ltd (Previously held in the name of Hamersley Iron Pty Ltd)			
Premises name	Gudai-Darri Iron Ore Mine (previously Koodaideri Exploration Camp)			
Premises location	Mining tenement - AML70/252 Miscellaneous Licence L70/7 Miscellaneous Licence L47/648 Miscellaneous Licence L47/682 Miscellaneous Licence L47/701 Miscellaneous Licence L47/768 Miscellaneous Licence L47/849 Miscellaneous Licence L47/912			
Local Government Authority	Shire of East Pilbara			
<b>Application documents</b>				
HPCM file reference number:	DER2014/000869			
Key application documents (additional to application form):	Attachment 1A: Proof of occupier status Attachment 1B: ASIC Company Extract Attachment 1C: Authorisation to act as a representative of the			

	occupier Attachment 2: Premise Maps Attachment 7: Location & Siting Maps Attachment 8: Licence Application Supporting Documentation Attachment 10: Amendment Application Fee Calculation Appendix A: Application form: Transfer works approval or licence; notify new occupier registered premises
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**Scope of application/assessment**

Summary of proposed activities or changes to existing operations.	The Licence amendment is for the following changes: <ul style="list-style-type: none"> <li>inclusion of constructed and commissioned (if required) infrastructure under works approval W6221/2019/1, W6622/2021/1, and W6520/2021/1;</li> <li>update the prescribed premises boundary as under works approval W6622/2021/1 and W6520/2021/1;</li> <li>condition imposed for the flexibility in nominated locations of proposed additional landfill sites within the prescribed premises boundary that would meet specified design and management conditions / criteria;</li> <li>update the premises name and licence holder; and</li> <li>any administrative changes.</li> </ul>
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**Category number/s (activities that cause the premises to become prescribed premises)**

**Table 1: Prescribed premises categories**

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 5: Processing or beneficiation of metallic or non-metallic ore	New category	53 million tonnes per year
Category 54: Sewage facility	558 cubic metres per day	No change
Category 64: Class II putrescible landfill site	20,000 tonnes per year	No change
Category 73: Bulk storage of chemicals etc	New category	1,530 cubic metres in aggregate

**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"/>	Existing Ministerial Statement MS 999
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Ministerial statement No: 999 EPA Report No: 1533
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Reference No: EPBC2012/6422

<p>Has the applicant demonstrated occupancy (proof of occupier status)?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Mining lease / tenement <input checked="" type="checkbox"/>  Mining tenement - AML70/252 Exp 06/06/2037  Miscellaneous Licence L70/7 Exp 06/03/2069  Miscellaneous Licence L47/648 Exp 17/05/2036  Miscellaneous Licence L47/682 Exp 28/01/2040  Miscellaneous Licence L47/701 Exp 03/04/2040  Miscellaneous Licence L47/768 Exp 28/01/2040  Miscellaneous Licence L47/849 Exp 03/04/2040  Miscellaneous Licence L47/912 Exp 8/04/2041</p>
<p>Has the applicant obtained all relevant planning approvals?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<p>Approval: N/A  Expiry date: N/A  If N/A explain why?</p>
<p>Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>CPS No: 4615/8  Area formally assessed by the EPA. Schedule 6, clause 2 clearing exemption applies. Clearing will be conducted in accordance with MS 999</p>
<p>Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Application reference No: N/A  Licence/permit No: N/A</p>
<p>Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Application reference No: N/A  Licence/permit No: GWL 177962 and GWL 207744</p>
<p>Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: Pilbara  Type: Proclaimed Groundwater Area and Surface Water Area  Has Regulatory Services (Water) been consulted?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>  Regional office: North West</p>

<p>Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a>)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>
<p>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>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Iron Ore (Mount Bruce) Agreement Act 1972</i> <i>Iron Ore (Hamersley Range) Agreement Act 1963</i> <i>Dangerous Goods Safety (Storage and Handling of Non-Explosives) Regulations 2007</i> <i>Aboriginal Heritage Act 1972 and Aboriginal Cultural Heritage Act 2021</i> <i>Environmental Protection Act 1986</i> <i>EPBC Act 1999</i> <i>Rights in Water and Irrigation Act 1914</i> <i>Mining Act 1978</i> <i>Environmental Protection (Unauthorised discharges) Regulations 2004</i> <i>Environmental Protection (Noise) Regulations 1997</i></p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>CSS_SITE_ID: 8564 Classification: Awaiting Classification Date of classification: N/A Description: Koodaideri Iron Ore Mine and Infrastructure Project (Assessment No. 1933)</p>