Government of Western Australia
Department of Water and Environmental Regulation

# Amendment Report

## Application for Licence Amendment

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

| | |
|---|---|
| **Licence Number** | L9102/2017/1 |
| **Licence Holder** | Chevron Australia Pty Ltd |
| **ACN** | 086 197 757 |
| **File Number** | APP-0027667 |
| **Premises** | Gorgon LNG Project<br>Barrow Island<br>Legal description –<br>Part of Crown Lease L077431, Certificate of Title Volume LR3168 Folio 315, Site 1 on Deposited Plan 409277;<br>Part of Crown Lease L077428, Certificate of Title LR3158 Folio476, Site 5 on Deposited Plan 64220; Temporary Wastewater Injection Facilities Licence LIC00554/2009_1_43;<br>Part of Revised Service Corridor Easement L641372, Certificate of Title Volume LR3142 Folio 58,<br>Deposited Plan 91514; Part of Construction & Operations Support Infrastructure Licence 00058/2014_A4735851; Permanent Water Disposal Wells Licence L00016_2012/1_A1991085;<br>Part of Road Infrastructure Licence Lic 00565/2009_1_31; CO2 Injection System Pipeline Easement L819294;<br>Part of CO2 Injection Wells System Licence LIC_00564_2009_A1744377; and Support Infrastructure Licence (Old Airport East) 00333- 2016_A6042022 BARROW ISLAND WA 6712<br>As defined by the premises boundary map in Schedule 1 and coordinates in DWER document: DWERDT940930 |
| **Date of Report** | 10/03/2026 |
| **Proposed Decision** | Revised licence granted |

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# 1. Decision summary

Licence L9102/2017/1 is held by Chevron Australia Pty Ltd (licence holder, Chevron) for the Gorgon LNG Project (the premises), located on Barrow Island.

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 L9102/2025/1 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 DWER Regulatory documents | Western Australian Government .

## 2.2 Application summary

On 25 February 2025, the licence holder submitted an application to the department to amend Licence L9102/2017/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The application is for the modification of the dehydration units on each LNG train within the gas treatment plant (GTP).

The proposed modification includes the installation of new dehydration pre-conditioning modules. Each new module contains a dehydration pre-conditioning separator and a dehydration pre-conditioning superheater, as well as all associated piping, instrumentation, lighting, cabling, fire and gas detection and structural steel. The modules will be integrated into the existing facility through interconnected process and utility piping, instrument and electrical cabling, and tie-in to the firewater ring main.

Construction activities involve the excavation of approximately 800 $m^3$ of fill material to allow for the installation of new foundations. The modules are fabricated off-site and will be transported to the island, placed on the foundations, and connected to the existing facility via pipework, electrical systems and instrumentation cabling.

During commissioning the only operation likely to lead to atmospheric emissions is leak testing with the generation of up to 30,000 $m^3$ of nitrogen to be released through the flare. No additional emissions from combustion of fuel gas are expected during normal operations, but additional atmospheric emissions may result from one train from de-pressuring to the wet flare system during emergencies.

This amendment is limited only to changes to Category 34 activities from the existing licence. No changes to the aspects of the existing licence relating to category 10, 52, 54, 61, 61A, 73 or 77 have been requested by the licence holder.

## 2.3 Part IV of the EP Act

Ministerial Approval for the revised and expanded Gorgon Gas Development was granted on 10 August 2009 subject to conditions outlined in Ministerial Statement 800 (MS 800). MS 800 superseded Ministerial Statement 748 for the initial proposal, providing approval for both the initial, and the revised and expanded Gorgon Gas Development. The approval authorises the construction and operation of three 5 mtpa LNG processing trains, associated infrastructure and a $CO_2$ injection system to inject reservoir $CO_2$ into the Dupuy Formation on Barrow Island. Since the revised and expanded Gorgon Gas Development was approved, further minor changes have also been made and/or approved and updates to MS 800 made as necessary. This includes updates to MS 800 via Ministerial Statement 1002 which approves a fourth LNG

train and a new Onshore Feed Gas Pipeline System located within the existing Onshore Feed Gas Pipeline Systems Corridor.

MS 800 contains conditions that need to be considered in the assessment of emissions and discharges from the premises and the imposition of regulatory controls. The relevant MS800 conditions are detailed in Table 1 below.

**Table 1: Considerations of MS 800 conditions relevant to this amendment**

| Overview | Delegated Officer considerations |
|---|---|
| Condition 7<br>Requires the submission and implementation of a Terrestrial and Subterranean Environment Protection Plan (TSEPP). The objectives of the Plan are to:<br>i. To reduce the adverse impacts from the construction and operation of the terrestrial facilities as far as practicable; and<br>ii. To ensure that construction and operation of the terrestrial facilities does not cause Material or Serious Environmental Harm outside the Terrestrial Disturbance Footprint, including below the surface of the land. | The delegated officer has reviewed the TSEPP and noted that the plan sets out management measures to minimise environmental impacts including but not limited to solid and liquid waste management, surface water management, leak and spill management, and light, noise and vibration management.<br>The design and operation of the stormwater and runoff system is detailed in the plan which manages inflows from stormwater runoff, process water, and firewater. The drainage system segregates stormwater into four classes:<br>• Class 1: Contaminated runoff;<br>• Class 2: Potentially contaminated run-off consisting of areas designated to have a lower likelihood of contamination compared to Class 1 areas;<br>• Class 3: On-site uncontaminated runoff; and<br>• Class 4: Intercepted off-site uncontaminated runoff.<br>The classes are dependent on level of contamination and its origin which informs treatment and disposal pathways.<br><br>The plan also identifies that the management of solid and liquid waste (with the exception of stormwater) is covered by the Solid and Liquid Waste Management Plan.<br>The Delegated Officer has considered this plan, in addition to the outcome of the risk assessment in determining regulatory controls relating to potential impacts to the terrestrial and subterranean environment. |
| Condition 30<br>Requires the submission and implementation of a Solid and Liquid Waste Management Plan (SLWMP). The objectives of the Plan are to:<br>i. ensure all proposal-related solid and liquid wastes are either removed from Barrow Island or, if not, that all practicable means are used to ensure that waste disposal does not cause Material or Serious Environmental Harm to Barrow Island and its surrounding waters;<br>ii. ensure discharges from any wastewater treatment plant, reverse osmosis plant, or other process water are disposed of via deep well injection, unless otherwise authorised by the Minister; and | The delegated officer has reviewed the SLWMP (Chevron, 2024) and notes that it includes management measures for the storage, handling and transport of solid wastes across Barrow Island generally, as well as more specific measures applicable to the waste transfer station.<br>The waste management measures detailed in the plan have been considered in the determination of the risk associated with waste management related to the application. Waste management measures specified in the plan will not be included in the licence to avoid duplication with MS 800. |

| | |
|---|---|
| iii. ensure any deep well injection of Proposal related liquid wastes is conducted in a manner that will not cause Material or Serious Environmental Harm to subterranean fauna and their habitats on Barrow Island. | |

## 2.4 Contaminated Sites Act 2003

In June 2022, the Gorgon Gas Treatment Plant (GTP) site (and an associated buffer around the Gorgon GTP site) was reported under the *Contaminated Sites Act 2003* (CS Act), as a potentially contaminated site resulting from substances including PFAS and Mercury in soil, drainage and groundwater above background concentrations. The site was classified under the CS Act on 10 April 2025 and a memorial was placed on the Certificates of Title.

A Preliminary Site Investigation (PSI) and Conceptual Site Model (CSM) was prepared by WSP and submitted to the department on 29 August 2025, which identified areas of potential environmental concern (APEC's) which reflect sources with known, evidenced or strongly suspected impacts (WSP, 2025). The Class 1 and Class 2 drains within the gas treatment plant was identified as an APEC with contaminants of concern being; Mercury, other metals, hydrocarbons, PFAS, condensates, MDEA and MEG.

The CSM outlines that a potential transport pathway for these COPCs is undetected leaks from the underground drainage systems. Such leaks may allow contaminants to enter surrounding soils, move downward through infiltration and percolation, migrate laterally within groundwater, and ultimately reach the marine environment (WSP, 2025). The CSM also notes that there are no operational leak detection systems for the Class 1 and 2 drainage systems.

Additionally, the licence was amended on 24 February 2025, to manage the presence of PFAS compounds within the premises. The amendment was initiated following notification by Chevron of the detection of low levels of PFAS within existing stockpiles of soil/fill material within the Gas Treatment Plant (GTP), groundwater and stormwater within and adjacent to the premises. This included notifications related to two incidents where water mixed with PFAS containing firefighting foam entered the Class 2 and 3 stormwater drainage systems. The licence was amended on 24 February 2025 to impose conditions to regulate the management of PFAS impacted soils and waters.

The delegated officer notes that the existing dehydration modules are within the class 2 drainage catchment area and the new modules are directly adjacent to the associated class 2 drainage network. And there is uncertainty if the fill material to be excavated is impacted by the COPC's listed above.

# 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 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 |
|---|---|---|---|
| Dust | Civil works (including crushing and screening) required to install the new modules | Air/windborne pathway | No special measures because emissions will be low level and of short duration. |
| Noise | Crushing and screening of material | Air/windborne pathway | Noise and vibration controls are not proposed for construction as they are considered insignificant compared to noise and vibration from the existing gas plant. |
| Potentially contaminated soil | Excavation of fill | Direct discharge or leaching of contaminants during storage. | Managed in accordance with the Terrestrial and Subterranean Environmental Protection Plan (TSEPP) v 4.1, the Solid and Liquid Waste Management Plan (SLWMP) and relevant existing licence conditions.<br>Fill material flagged for disposal will be transferred into sealed containers (or similar) prior to removal off island. Disposal will be to an appropriate CAPL approved and licensed waste disposal facility |
| Gaseous Emissions | Up to 30,000 $m^3$ of nitrogen released for leak testing during commissioning | Air/windborne pathway | No measurable change or effect on local air quality is anticipated due to rapid dispersion of nitrogen and the gas comprising 78% of atmospheric gases therefore no specific controls are proposed. |
| | In the event of emergency depressurisation up to 12,000 tonnes of hydrocarbons. | Air/windborne pathway | Hydrocarbons will be combusted in the wet flare causing a short-term increase in combustion gas emissions only.<br>Each module has fire and gas detection. |

### 3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020a), the delegated officer has excluded employees, visitors and contractors of the licence holders 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 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 3: Sensitive human and environmental receptors and distance from prescribed activity**

| **Human receptors** | **Distance from prescribed activity** |
|---|---|
| Varanus Island oil and gas facility (including workers accommodation camp) | 18 km northeast of the Gas treatment plant (not considered a sensitive receptor) |
| **Environmental receptors** | **Distance from prescribed activity** |
| Managed Lands and Waters | The Gorgon Gas Project is located within the Barrow Island Nature Reserve (BINR), a Class A Nature Reserve. Marine waters surrounding the north, west and south sides of Barrow Island form part of the Barrow Island Marine Management Area |
| Threatened Ecological Communities and Priority Ecological Communities | Priority Ecological Communities for Triodia angusta-dominated creekline vegetation and Coastal dune native tussock grassland dominated by Whiteochloa airoides are located in smaller areas to the north, south and west of the premises |
| Threatened / priority flora | Three species of priority flora are located on Barrow Island west of the premises. |
| Threatened / priority fauna (terrestrial and marine) | A number of threatened and priority fauna are known to occur on Barrow Island including a number of species that are listed under the *Biodiversity Conservation Act 2016* (WA) (BC Act) and the Threatened (Vulnerable) Species list of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). |
| Threatened / priority fauna (subterranean) | Barrow Island is recognized as being of high conservation significance for subterranean fauna communities at state, national and international levels. The subterranean fauna demonstrates high level of endemicity and species diversity and includes one of only two stygofauna vertebrate species occurring in Australia. |
| Groundwater | There is one shallow unconfined freshwater aquifer predominantly within Tertiary limestone on Barrow Island. This freshwater aquifer forms a lens of relatively fresher groundwater floating upon denser, saline ground water at depths between 9 m and 53 m and supports subterranean fauna. The groundwater system is linked to the marine ecosystem (<100 m from the premises). |

## 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 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 4. The Revised Licence L9102/2017/1 that accompanies this Amendment Report authorises emissions associated with the 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, commissioning and operation**

| Risk Event | | | | | Risk rating[1] C = consequence L = likelihood | Licence Holder's controls sufficient? | Conditions[2] of licence | Reasoning |
|---|---|---|---|---|---|---|---|---|
| **Source/Activities** | **Potential emission** | **Potential pathways and impact** | **Receptors** | **Licence Holder's controls** | | | | |
| ***Construction*** | | | | | | | | |
| Installation of new modules including earthworks, foundations, structural supports, interconnecting process and utility piping. | Dust | Air/windborne pathway causing impacts to health and amenity | Flora within the A class nature reserve | Refer to Section 3.1 | C = Minor<br>L = Unlikely<br>**Low Risk** | Y | Condition 20 | The delegated officer considers that the short-duration installation works for the dehydration pre-conditioning modules, to be installed within the Gas Treatment Plant (GTP), are not expected to result in dust emission impacts. Noise emissions from these works are also expected to be insignificant when compared to the existing operational noise of the GTP. On this basis, the delegated officer has included Condition 20 authorising the installation of the proposed dehydration pre-conditioning modules. |
| | Noise | | Fauna within the A class nature reserve | Refer to Section 3.1 | C = Minor<br>L = Unlikely<br>**Low Risk** | Y | | |
| | Soil/fill material potentially containing Mercury and or PFAS compounds | Pathway: Physical movement of fill material for reuse or stockpiling<br>Impact: Contamination of soil, groundwater, and/or health impacts to flora and fauna. | Flora and fauna within the Class A Nature Reserve<br>Soils<br>Groundwater ~ 9m below surface<br>Subterranean fauna communities | Refer to Section 3.1 | C = Major<br>L = Rare<br>**Medium Risk** | N | **Condition 23** | Chevron have proposed to manage the excavated fill material for contamination risks in accordance with their revised TSEPP version 4.1 (2024) and SLWMP (2016). The delegated officer notes that version 4.1 of the TSEPP is yet to be formally endorsed by the department. As a result, the management measures in this plan related to soil reuse including implementation of their internal Soil Disturbance Procedure have not been taken into consideration within this risk assessment and setting conditions.<br>Measures within version 4.1 of the TSEPP have been reviewed by the delegated officer and it is noted that conclusions rely on preliminary site investigation processes, sampling analysis, and an Auditor endorsed soil reuse Management Plan. However, this |

| Risk Event | | | | | Risk rating[1] C = consequence L = likelihood | Licence Holder's controls sufficient? | Conditions[2] of licence | Reasoning |
|---|---|---|---|---|---|---|---|---|
| Source/Activities | Potential emission | Potential pathways and impact | Receptors | Licence Holder's controls | | | | |
| | | | | | | | | amendment assessment is not the appropriate regulatory pathway to determine the suitability of the soil reuse procedures proposed under version 4.1 of the management plan. The current approved TSEPP described in section 2.3 does not have measures related to soil/fill contamination and suitability criteria for reuse.<br><br>Therefore, the delegated officer has determined to restrict the reuse and deposition of the fill material to be excavated on the basis of the uncertainty of contamination status and that it is within/adjacent to an area of potential concern as described in section 2.4. Accordingly, Condition 21 has been included in the licence, requiring that any fill sourced from the excavation works is to be tested and found to have no detectable levels of PFAS compounds, and mercury (below 0.1mg/kg) prior to being deposited on the premises therefore restricting reuse. This requirement is intended to maintain an acceptable level of environmental risk during the limited construction phase, and to ensure that potentially contaminated fill material is not inadvertently spread or reused across the premises.<br><br>If fill material is not suitable for reuse it will be disposed of in accordance with the Solid and Liquid Waste Management Plan which includes the following measures:<br><br>• Waste receptacles that may attract fauna or generate windblown rubbish will be covered or closed. |

| Risk Event | | | | | Risk rating[1] C = consequence L = likelihood | Licence Holder's controls sufficient? | Conditions[2] of licence | Reasoning |
|---|---|---|---|---|---|---|---|---|
| **Source/Activities** | **Potential emission** | **Potential pathways and impact** | **Receptors** | **Licence Holder's controls** | | | | |
| | | | | | | | | • Unidentified wastes will be regarded as hazardous waste for storage, treatment, and disposal.<br>• Wastes will be securely stored and contained during transport from Barrow Island and disposed of on the mainland, at an appropriately licensed facility. |
| ***Commissioning and Operation*** | | | | | | | | |
| Commissioning and operation of dehumidifier modules | Up to 30,000 $m^3$ of nitrogen released for leak testing during commissioning | Air/windborne pathway causing impacts to fauna particularly bird life. | Fauna within the A class nature reserve | Refer to Section 3.1 | C = Minor<br>L = Rare<br>**Low Risk** | Y | N/A | The delegated officer considers that nitrogen is the only emission from the activity, with no additional release of combustion gases. Any potential impacts on air quality are expected to be negligible, and there is no risk of prolonged exposure to fauna from this temporary activity. |
| | Combustion gases from emergency release of up to 12,000 tonnes of hydrocarbon through flare. | Air/windborne pathway causing impacts to fauna particularly bird life. | Fauna and flora within the A class nature reserve | Refer to Section 3.1 | C = Minor<br>L = Rare<br>**Low Risk** | Y | Condition 20 | Emergency depressurisation emissions will continue to be directed to the wet flare for treatment, which is considered an appropriate and effective control. The works are expected to result in only a very minor, short-term increase in combustion gases (e.g. NOx), which does not alter the previously assessed risk profile for combustion emissions as determined at the grant of the licence and outlined in Section 9 of the 2018 Decision Report (DWER, 2018), provided on 26 July 2018. Accordingly, no additional licence conditions are required. |
| | Noise | Air/windborne pathway causing | Fauna within the A class nature reserve | Refer to Section 3.1 | C = Slight<br>L = Rare | Y | N/A | Noise is expected to be insignificant when compared to the noise of the existing gas treatment plant |

| Risk Event | | | | | Risk rating[1] C = consequence L = likelihood | Licence Holder's controls sufficient? | Conditions[2] of licence | Reasoning |
|---|---|---|---|---|---|---|---|---|
| Source/Activities | Potential emission | Potential pathways and impact | Receptors | Licence Holder's controls | | | | |
| | | impacts to fauna. | | | **Low Risk** | | | |

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 |
|---|---|---|
| DBCA was advised of the proposal on 30 April 2025 | DBCA replied on 2 May 2025 stating they did not have any comment. | N/A |
| Department of Jobs, Tourism, Science and Innovation (DJTSI) was advised of the proposal on 30 April 2025 | None | N/A |
| Conservation Council of Western Australia was advised of this proposal on 30 April 2025. | None | N/A |
| Draft decision provided to Licence Holder for comment. | Refer to Appendix 1 | Refer to Appendix 1 |

# 5. Decision

The delegated officer has determined that the proposal to install three new dehydration preconditioning modules on the premises does not pose an unacceptable level of risk to public health or the environment. This determination is based on the following:

- There will be no additional emissions caused by the operation of the modules; and
- Conditions imposed by the department require all fill material excavated to facilitate the works to be tested for PFAS compounds and mercury, and to be confirmed as having no detectable concentrations of PFAS and below 0.1mg/kg of mercury prior to being reused or deposited anywhere on the premises.

Accordingly, the licence has been amended to authorise the works necessary to enable the installation of new dehydration preconditioning modules. The delegated officer is satisfied that the above controls lower the overall risk profile of the proposed works and adequately addresses the potential for unacceptable impacts to the environment to occur.

# 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 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 |
|---|---|
| 20 | Insertion of construction condition under specified actions. |
| 21 | Soil testing condition included to ensure material sourced from excavations to facilitate the works within condition 20 is not deposited within the premises prior to being tested for PFAS and Mercury and confirmed that soil samples are below the LOR for PFAS and below 0.1 mg/kg of mercury in soil. |
| 22 and 23 | Reporting conditions for construction of preconditioning modules for the dehumidifiers |
| Schedule 1 Figure 9 | Map inserted to show location of preconditioning modules |

# References


1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2018, *Application for Licence L9102/2017/1 Decision Report*, Perth Western Australia
3. DWER 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020a, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Chevron 2025, *Application for amendment to licence*, Perth, Western Australia
6. Chevron 2025, *Gorgon Project L9102 Licence Amendment Supporting Information*, Perth, Western Australia
7. Chevron 2024, *Gorgon Gas Development and Jansz Feed Gas Pipeline Solid and Liquid Waste Management Plan (SLWMP)*, Perth, Western Australia
8. Chevron 2022, *Gorgon Gas Development and Jansz Feed Gas Pipeline Terrestrial and Subterranean Environment Protection Plan (TSEPP) v 3.2*, Perth, Western Australia
9. WSP 2025, *Preliminary Site Investigation – Conceptual Site Model and Data Gap Assessment Gorgon GTP,* Prepared for Chevron Australia Pty Ltd, 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 |
|---|---|---|
| Condition 21 (c) (i) | The Licence holder comments that they do not agree with condition 21 (c) (i) requiring any soil sourced from excavations related to the installation of the de-hydration preconditioning modules to be sampled and confirmed to have PFAS compounds under the specified limits of reporting (LOR) for soil prior to deposition within the premises.<br><br>Additionally the licence holder noted previous correspondence to DWER on 16 January 2026 titled "*Regulation of Chevron's activities across the Environmental Protection Act 1986 and the Contaminated Sites Act 2003"* where *CAPL* communicated they are not aligned with the departments requirement for all PFAS compounds in the standard suite to be below the LOR as specified in Condition 16, and sought clarification on why the site specific criteria (developed by the licence holder) are not considered suitable for settling limits relating to Part V regulation.<br><br>The licence holder provided justification and further context regarding the use of their site-specific PFAS ecological screening criteria for determining soil reuse, including that:<br><br>• Ambient environmental concentrations of PFAS are present on Barrow Island and globally, including concentrations above current limits of reporting.<br><br>• The licence holder has developed site-specific PFAS criteria intended to meet the requirements of both the CS Act and the EP Act, and which are stated to be consistent with the PFAS NEMP.<br><br>• The site-specific criteria are described by the licence holder as being evidence-based and Barrow Island-specific, and as having been developed with multiple fronts of conservatism to protect the high conservation value environment of Barrow Island.<br><br>• The licence holder considers the use of risk-based criteria to be preferable to limits based on laboratory limits of reporting for a discrete suite of PFAS compounds, noting that LORs are determined by current analytical capability rather than evidence of environmental risk or impact.<br><br>• The licence holder advised that an inability to reuse soil below the site-specific | The delegated officer notes the request to amend Table 16 to represent the site specific PFAS criteria developed by the licence holder for soil and groundwater/leachate rather than the limit of reporting for PFAS compounds.<br><br>Management of PFAS and the reuse of PFAS-impacted soils at the premises is an ongoing matter which the department is currently undertaking a review of, following CAPL's submission of the plans required under conditions 17 and 18 of the licence.<br><br>Given the proximity of the premises to the Barrow Island Nature Reserve, detailed consideration must be given to assessing the suitability of the proposed site-specific criteria. In this context, it is not considered appropriate to assess the reuse of soil from these works in isolation within this amendment application. Additionally, it is not considered appropriate to alter the scope of the assessment at this late stage. Instead, the department will consider the reuse requirements as part of the review of PFAS impacted soils at the premises as a whole.<br><br>Accordingly, the delegated officer has determined that the limits of reporting for the specified suite of PFAS compounds will be retained for soil movements associated with excavations required for the installation of the de-hydration preconditioning modules, noting that this is consistent with existing soil movements requirements for the Area 20B stockpile. The delegated officer considers this approach is necessary due to the significance of the potential receiving environment, in accordance with a risk-based approach as outlined in DWER's Guidance Statement: Setting Conditions. |

| Condition | Summary of Licence Holder's comment | Department's response |
|---|---|---|
| | criteria would result in increased environmental and safety risks, including the export of soil to the mainland as waste, importation of material from the mainland, and the sourcing of alternative native topsoil on Barrow Island.<br>• The licence holder requested that Condition 21(c)(i) be amended to require all PFAS compounds in the standard analytical suite to be below the site-specific criteria rather than the limits of reporting, and that Table 16 be deleted and replaced with a table presenting the site-specific PFAS criteria for Barrow Island, including the hazard index approach for a SUM of all PFAS.<br>• The licence holder stated that Part V licence conditions should be targeted at preventing, limiting or managing emissions with a credible potential to cause environmental harm or pollution, and that such harm or pollution can only be demonstrated through the identification of a receptor, an exposure pathway and adverse impacts. The licence holder referenced the Barrow Island Contaminated Sites Strategy: PFAS Assessment Elements as providing further detail on the development of the site-specific criteria.<br>• The licence holder noted that the Gorgon Gas Development is also regulated under Part IV of the Environmental Protection Act 1986 and expressed the view that PFAS risks may be more appropriately managed through Part IV environmental management plans, including the Terrestrial and Subterranean Environment Protection Plan (TSEPP) and Terrestrial and Subterranean Environment Monitoring Program (TSEMP). The licence holder advised that revision 4.1 of the TSEPP, which includes proposals for managing PFAS risks, was submitted on 1 August 2024, and requested an update on the status of DWER's review. | The delegated officer notes the licence holder's comments regarding PFAS management under Part IV of the Environmental Protection Act 1986, including the assessment of revision 4.1 of the Terrestrial and Subterranean Environment Protection Plan (TSEPP). The assessment of Part IV environmental management plans is outside the scope of this Part V licence amendment, and any request for an update on the TSEPP assessment should be directed to EPA Services. |