Amendment Report

Application for Works Approval Amendment

Part V Division 3 of the Environmental Protection Act 1986

Works Approval

Number

W6315/2019/1

Works Approval Holder IB Operations Pty Ltd

ACN 165 513 557

File Number DER2019/000541

Premises Iron Bridge Magnetite Project

Mining Tenements M45/1226, M45/1244, L45/293, L45/294,

L45/359, L45/360, L45/361, L45/364 and L45/367.

NEWMAN WA 6753

Date of Report 30 July 2021

Decision Revised works approval granted

Alana Kidd

Manager, Resource Industries

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

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1. Decision summary

Works Approval W6315/2019/1 is held by IB Operations Pty Ltd for the Iron Bridge Magnetite Project (the Premises), located at mining tenements M45/1226, M45/1244, L45/293, L45/294, L45/359, L45/360, L45/361, L45/364 and L45/367, NEWMAN WA 6753.

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 Works Approval W6315/2019/1 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 https://dwer.wa.gov.au/regulatory-documents.

2.2 Amendment summary

On 17 February 2021, the Works Approval Holder submitted an application to the department to amend Works Approval W6315/2019/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendment is being sought:

Relocation of Category 89 landfill within mining tenement M45/1226.

The proposed location for the landfill facility is closer in proximity to the operation and will require less civil works to construct. The amendment also proposes a design change, as outlined in Table 1.

The landfill facility will be up to 5 ha with a capacity of approximately 4000 tpa of putrescible waste, inert waste, hydrocarbon contaminated soils meeting class II criteria as defined in the Landfill Waste classification and Waste Definitions 1996 (As amended 2019) (DWER 2019).

Pathways and receptors have been reassessed for the proposed location of the landfill, this includes the depth to groundwater, the soil type, distance to waterways and other receptors that may be impacted by emissions and discharges.

The facility will be managed in accordance with *Environmental Protection (Rural Landfill)* Regulations 2002. Management procedures from the original works approval still apply.

This amendment is limited only to changes to Category 89 activities from the Existing Works Approval. No changes to the aspects of the existing Works Approval relating to Categories 54, 57, 62 and 73 have been requested by the Works Approval Holder.

Table 1 below outlines the proposed changes to the existing Works Approval.

Table 1: Proposed design changes

C	Category	Current design	Proposed design	Description of proposed amendment
8	99	4 x landfill trenches with capacity of approximately 4000 tpa, covering up to 5 ha.	capacity of approximately	Single design change from 4 landfill trenches to 1 landfill trench.

Figure 1 illustrates the proposed amendment location change.

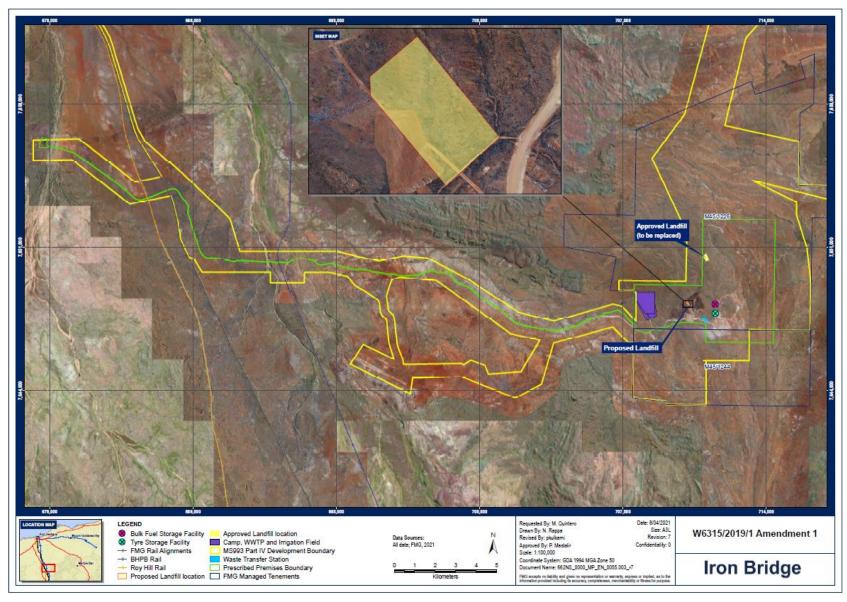


Figure 1: Proposed amendment location

2.3 Siting

2.3.1 Groundwater and surface water sources

The landfill is situated upon minor ephemeral drainage lines that lie within the Turner River catchment. Turner River is the closest major watercourse to the landfill premises and lies approximately 15 km downstream and west. The closest sensitive receptor is a groundwater dependent ecosystem approximately 8 kilometers from the site, and within another catchment area. There are no stock bores in the immediate vicinity of the landfill site, the nearest operational bores are approximately 800 metres downstream. The landfill is not located within a 1 in 100 year flood zone.

The landfill lies at 285.5 metres Australian Height Datum (AHD) and the groundwater level is estimated to be between the 270 and 280 metres AHD contours. Groundwater levels at the landfill are estimated to be between 10 and 15 metres below the surface. This closer to the surface than the previously approved location, which was reported to have a groundwater depth of approximately 20 m below ground level. The groundwater at the proposed location will be approximately 5 – 10 metres closer to ground level.

Groundwater quality is regarded as fresh to slightly brackish with pH being recorded between 5.21 and 8.79. Common elements present are iron, arsenic, boron, copper, nickel, vanadium and zinc. This is reflective of the local ore mineralisation. Figure 2 details the groundwater quality in the area.

Figure 3 illustrates the landfill location and groundwater contours.

Iron Bridge 2013-2020 Groundwater analyses - Dissolved Element Concentrations (mg/L)

Range	Minimum	26th %o	Mean	76th %o	80th %o	90th %o	Maximum	Total Analyses	ANZECC 86% of Species Limit of Protection
рН	5.21	7.68	7.82	8.05	8.09	8.19	8.79	188	6.0-8.5
EC (µ8/cm)	184	969	1406	1660	1794	2392	5420	185	-
TDS	111	587	888	1043	1160	1555	3170	186	-
HCO3 as CaCO3	3	409	434	516	522	558	688	163	-
CO3 as CaCO3	1	1	2	1	1	1	30	163	-
ОН-	1	1	1	1	1	1	1	160	-
Alk as CaCO3	3	413	435	516	522	558	688	163	-
Hardness as CaCO3	201	450	558	737	745	760	776	3	-
Ag	0.0001	0.0001	0.0007	0.0010	0.0010	0.0010	0.0010	96	0.00005
Al	0.005	0.010	0.013	0.010	0.010	0.013	0.334	177	0.055
As (V)	0.0002	0.0010	0.0104	0.0050	0.0090	0.0219	0.2270	132	0.013
В	0.008	0.210	0.444	0.419	0.500	0.735	6.970	186	0.37
Ba	0.002	0.008	0.026	0.031	0.041	0.059	0.130	104	-
Be*	0.0001	0.0001	0.0007	0.0010	0.0010	0.0010	0.0010	132	0.00013
Ca	1.8	29.0	44.3	55.0	57.3	69.8	126.0	163	-
Cd*	0.00005	0.00005	0.00011	0.00010	0.00010	0.00010	0.00090	132	0.0002
CI	28	98	218	260	321	431	1160	159	
Co	0.0001	0.0010	0.0030	0.0020	0.0020	0.0060	0.0721	132	0.0014
Cr (VI)	0.0002	0.0008	0.0010	0.0010	0.0010	0.0013	0.0060	132	0.001
Cu	0.0005	0.0010	0.0050	0.0060	0.0082	0.0139	0.0440	132	0.0014
F	0.0	0.1	0.4	0.6	0.7	0.9	1.0	26	-
Fe	0.002	0.050	0.408	0.050	0.050	0.232	37.2	178	0.3
Hg*	0.00004	0.00004	0.00010	0.00010	0.00010	0.00010	0.00150	132	0.0006
к	0.2	1.0	4.5	6.1	7.0	9.0	54.0	163	-
Mg	4.0	78.0	106.0	133.0	147.6	168.8	253.0	163	-
Mn	0.0005	0.0017	0.1540	0.1113	0.1380	0.6705	1.8000	186	1.9
Mo*	0.0001	0.0004	0.0032	0.0046	0.0053	0.0080	0.0398	55	0.034
Na	17.2	59.0	133.5	181.5	218.0	264.0	724.0	163	-
NI	0.0005	0.0010	0.0137	0.0100	0.0128	0.0224	0.5720	132	0.011
NO ₈ as N	0.01	0.02	0.36	0.56	0.69	0.85	2.04	131	0.7
NO ₂ +NO ₂ as N	0.01	0.02	0.38	0.55	0.70	0.88	2.95	157	-
TN as N	0.01	0.02	0.38	0.55	0.70	0.88	2.95	157	-
Pb*	0.0001	0.0001	0.0008	0.0010	0.0010	0.0010	0.0030	132	0.0034
Se (Tot)*	0.0002	0.0016	0.0071	0.0100	0.0100	0.0100	0.0200	132	0.011
81	6.85	15.15	24.35	33.25	34.46	36.54	43.00	154	-
304	2	46	120	161	194	244	738	160	-
Sr	0.004	0.178	0.287	0.366	0.416	0.486	1.010	150	-
U*	0.00005	0.00026	0.00600	0.00328	0.00462	0.01072	0.16500	52	0.0005
v	0.0002	0.0100	0.0364	0.0600	0.0700	0.0868	0.2400	132	0.006
Zn	0.001	0.008	0.092	0.061	0.080	0.265	0.912	132	0.008

U": value below detection limit

Figure 2: Groundwater quality

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

^{0.008:} value exceeding ANZECC 95% of Species Limit of Protection

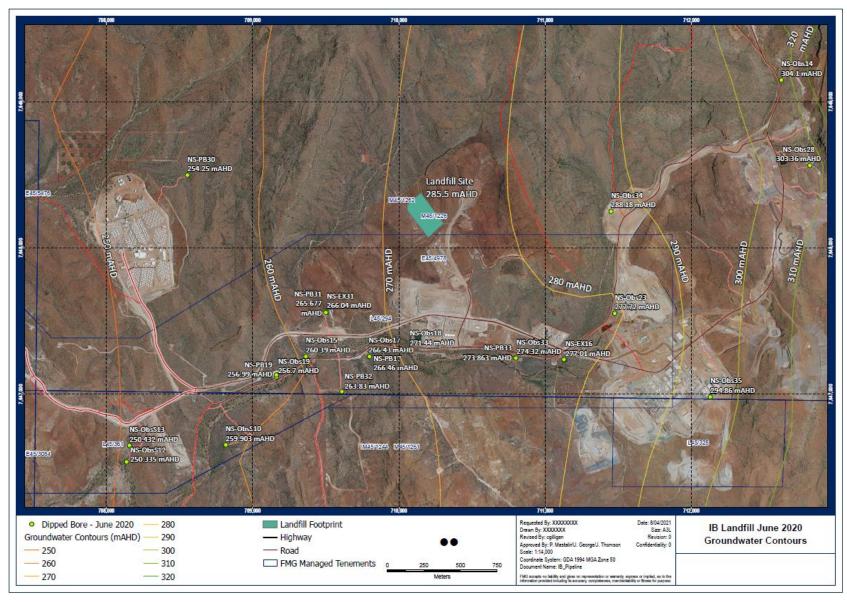


Figure 3: Groundwater contours

2.3.2 Soil type

The soil type of the proposed location is classed as Red Calcareous Shallow Loams, which are described as silt and clay rich soils within broad flat plains and low permeability.

2.4 Part IV of the EP Act

The project has been assessed under Part IV of the EP Act as EPA report number 1514. Ministerial Statement (MS) 993 was published on the 5th of January 2015 in relation to IB Operation Pty Ltd's proposal to develop an open cut iron ore mine. the result of this assessment defines the mine development envelope and contains the following conditions

- Ensuring that the project is implemented so that it does not affect the viability of *Pityrodia* sp.;
- Ensuring that the implementation of the proposal does not affect the viability of the Pilbara leaf-nosed Bat, through a Mine Exclusion Zone around Cave 13;
- ensuring that mine construction and operational activities are carried out in a manner that minimises impacts to the Northern Quoll; and
- ensuring that mining activities do not impact the water quality or hydrogeological regime of Site 12 Pool.

Under MS 993 clearing has been authorised for no more than 3,493 ha within the mine development envelope. Any potential disturbance to flora, vegetation and the specified areas during the construction and time limited operations of the landfill has been considered to comply with the conditions set out in MS 993.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guidance Statement: Risk Assessments* (DER 2017).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this Amendment Report are detailed in

Table 2 below.

Table 2 also details control measures proposed by the Works Approval Holder to assist in controlling emissions, where necessary.

Table 2: Works Approval Holder controls

Emission	Sources	Potential pathways	Proposed controls
Leachate from landfill	Putrescible Landfill.	Infiltration into groundwater,	Facility to be constructed in accordance with the <i>Environmental Protection</i> (Rural Landfill) Regulations 2002. All construction

Emission	Sources	Potential pathways	Proposed controls
		surface runoff	requirements previously approved under W6315/2019/1 will remain. This includes ensuring that there is no burial within:
			 5 m from the fence surrounding the site given the remote location, the applicant considers 5 m is deemed a sufficient buffer, rather than the 35 m described in the Regulations.
			50 m from a surface water body.
			3 m of the highest level of the water table aquifer at the site.
			Also
			No hazardous or liquid waste will be disposed of in the landfill facility.
Contaminated or potentially contaminated stormwater	Putrescible landfill, burning greenwaste and contaminated water sump	Infiltration into groundwater, surface runoff	The drainage requirements will be constructed in accordance with Environmental Protection (Rural Landfill) Regulations 2002. This includes
			 Stormwater will be diverted away from landfill cells.
			 Stormwater that has come into contact with waste will be diverted to a sump, or otherwise retained on the site.
			Figure 3 illustrates the drainage and sump design.
Odour	Putrescible landfill	Air / wind	Landfill trench to be covered in accordance with the <i>Environmental Protection (Rural Landfill) Regulations 2002</i> . This includes covering the trench weekly by a minimum of 30 cm of soil to minimise landfill odours.
Dust	Putrescible landfill during construction and cover operations	Air / wind	Water will be used for dust suppression during construction and if required prior to inert cover application.
Windblown	Putrescible landfill	Air / wind	Waste will be covered at least weekly.
waste			Ensure that waste contained within the landfill, with any waste that has been washed or blown away from the tipping area returned at least monthly.
			Other proposed management options include
			Minimising the size of the active tipping area
			Cleaning litter from the surrounding fences and areas

Emission	Sources	Potential pathways	Proposed controls
			 Consideration of delaying waste disposal during high wind conditions until conditions have settled
Fauna ingress	Putrescible landfill	Ingress from surrounding area	A 1.8 metre high chainlink stock proof fence will be constructed along the perimeter of the premises.

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the Works Approval 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 human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (Guidance Statement: Environmental Siting (DER 2016).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity				
Residential Premises	There are no residential receptors within a 30 km radius of the Premises				
Other mining areas	Atlas Iron Limited – Abydos Ore Project – 7 km north east.				
Environmental receptors	Distance from prescribed activity				
Proclaimed Pilbara surface water zone, including the Turner River	Turner River located approximately 15 km downstream and west of the activity				

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Works Approval 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 Works Approval Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the Works Approval 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 Works Approval W6315/2019/1 that accompanies this Amendment Report authorises construction and time-limited operations. The conditions in the Revised Works Approval have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises. A risk assessment for the operational phase has been included in this Amendment Report, however licence conditions will not be finalised until the department assesses the licence application.

Table 4. Risk assessment of potential emissions and discharges from the Premises during construction and operation

Risk Event	Risk Event					Works		Justification for
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Works Approval Holder's controls	C = consequence L = likelihood	Approval Holder's controls sufficient?	Conditions ² of works approval	additional regulatory controls
Construction								
Construction of Landfill facility, channels and stormwater sump	Dust	Air/wind dispersion causing impacts to amenity	Closest receptor is the Atlas Iron Limited Abydos Ore Project accommodation camp located 14 km north east of the premises	Refer to Section 3.1.	C = Slight L = Rare Low Risk	Y	Condition 1, Table 1, Rows 7 and 8, under headings Landfill facility and Stormwater infrastructure	N/A
Operation								
(including time-limited-o	perations operation	ons)						
Covering operations	Dust	Air/windborne pathway causing impacts to amenity	Closest receptor is the Atlas Iron Limited Abydos Ore Project accommodation camp located 14 km north east of the premises	Refer to section 3.1	C = Slight L = Rare Low Risk	Y	No change from original works approval	N/A
Waste acceptance, handling, storage and burial	Odour	Air/windborne pathway causing impacts to health and amenity	Closest receptor is the Atlas Iron Limited Abydos Ore Project accommodation camp located 14 km north east of the premises	Refer to section 3.1	C = Minor L = Rare Low Risk	Y	No change from original works approval	N/A
	Contaminated stormwater	Overland runoff	Turner river approximately 15km downstream and west of the premises	Refer to section 3.1	C = Slight L = Possible	Y	No change from original works approval	N/A

Risk Event	Risk Event						vent			Risk rating ¹	Works		Justification for
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Works Approval Holder's controls	C = consequence L = likelihood	Approval Holder's controls sufficient?	Conditions ² of works approval	additional regulatory controls					
					Low Risk								
	Windblown waste	Air/windborne pathway causing impacts to amenity	Closest receptor is the Atlas Iron Limited Abydos Ore Project accommodation camp located 14 km north east of the premises	Refer to section 3.1	C = Slight L = Unlikely Low Risk	Y	No change from original works approval	N/A					
Burning green waste	Fire (contaminated fire water and burnt materials)	Overland runoff impacting water and soil quality	Surface water receptors which feed into the Turner River approximately 15km downstream	Refer to section 3.1	C = Slight L = Unlikely Low Risk	Y	No change from original works approval	N/A					
Stormwater drainage pond	Contaminated stormwater runoff	Direct discharge to land impacting water and soil quality	Surface water receptors which feed into the Turner River approximately 15km downstream	Refer to section 3.1	C = Slight L = Possible Low Risk	Υ	No change from original works approval	N/A					

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

Note 2: Proposed Works Approval 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
Department of Mines, Industry Regulation and Safety (DMIRS) advised of amendment (10/06/2021)	Phone call received on the 08/07/2021 advising the DWER that there were no comments on this application.	N/A

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Works Approval 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 Works Approval as part of the amendment process.

Table 6: Summary of works approval amendments

Condition no.	Proposed amendments
1 Table 1 Points 7 and 8	Change to design of landfill, new design is 1 landfill trench, instead of 4 in the previous design. Updated figure labels
Schedule 1 Figure 1	Changes to the landfill location. Figure 1 shows the new location
Schedule 1 Figure 7	Updated Waste Transfer Station map not including old landfill layout
Schedule 1 Figure 6	Changes to the landfill location. Figure 6 shows the new layout
13 Table 5	Updated figure numbering under Infrastructure location
14 Table 6	Updated figure numbering under Discharge point location

References

- 1. Department of Environment Regulation (DER) 2016, *Guidance Statement:* Environmental Siting, Perth, Western Australia.
- 2. DER 2017, Guidance Statement: Risk Assessments, Perth, Western Australia.
- 3. DER 2015, Guidance Statement: Setting Conditions, Perth, Western Australia.
- 4. Email titled "W6315/2019/1 Amendment application" dated 17/02/2021 authored by IB Operations Pty Ltd, available at DWER records (DWERDT415112).

Appendix 1: Summary of Works Approval Holder's comments on risk assessment and draft conditions

Condition	Summary of Works Approval Holder's comment	Department's response
N/A Response to the location of stock bores and sensitive receptors in proximity to landfill site.	There are no stock bores in the immediate vicinity of the landfill site and the nearest operational FMG bores, NS-PB31 and NS-PB17 are ~800m downstream of the landfill site. The nearest sensitive receptor, GDE vegetation is located 8 km from the landfill site, within another catchment.	Noted The Department has considered this in the Siting section of this amendment report.
N/A Response to the location in relation to a 1 in 100 year flood zone.	IBO provides the figure at attachment 2 to demonstrate the 1% AEP Baseline Flood that shows the landfill site is not located within a 1 in 100 year flood zone.	Noted The Department has considered this in the Siting section of this amendment report.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)							
Application type							
Amendment to works approval	\boxtimes	Current works approval number:		W6315/2019/1			
Date application received		17/02/2021	17/02/2021				
Applicant and Premises details							
Applicant name/s (full legal name/s)		IB Operations Pty Ltd					
Premises name		Iron Bridge Magnetite Project					
Premises location		L45/293, L45/294, L45/359, L45/366, L45/367, M45/1226, M45/1244 NEWMAN WA 6753					
Local Government Authority		Shire of East Pilbara	Shire of East Pilbara				
Application documents							
HPCM file reference number:		DWERDT415112					
Key application documents (additional to application form):		Original Documents Attachment 2 Premises map Attachment 3B facility coordinates From RFI Landfill amendment response document Attachment 2 Premises map (showing only proposed landfill)					
Scope of application/assessment							
		Works approval amendment					
		Construction of category 89 putrescible landfill facility					
	The landfill is proposed to be relocated which has been approved under W6315/2019/1.						
		Existing Approval		Proposed Amendment			
Summary of proposed activities or changes to existing operations.	Not exceeding 5 ha 4 x landfill trenche		Not exceeding 5 ha landfill with 1 x landfill trenches				
	Trenches constructed with compacted earth.		Trenches constructed with compacted earth.				
	Open tipping area ≤30 m in length and ≤2 m high.		Open tipping area ≤30 m in length and ≤2 m high.				
	Perimeter drainage channel to be installed		Perimeter drainage channel to be installed				
		Stock-proof fence to	be installed	Stock-proof fence to be installed			

Category number/s (activities that caus	e the	nremises	s to hecome prescr	ihed	nramisas)		
		premises	s to become prescr	ibeu	premises)		
Table 1: Prescribed premises categorie Prescribed premises category and description	Assessed production or design capacity				Proposed changes to the design capacity		
Category 89 : Putrescible landfill site with a design capacity of more than 20 but less than 5 000 tonnes per year.	Assessed – use for existing premises where amendments are being sought for the relocation of the landfill facility.			r	The landfill is proposed to be elocated within tenement M45/1226 from the original works approval.		
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 □ No ⊠		app Ma	Referral decision No: MS 993 applies Managed under Part V Assessed under Part IV		
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?		Yes ⊠	No □	Mir	nisterial statement No: MS 993 A Report No: 1514		
Has the proposal been referred and/or assessed under the EPBC Act?		Yes ⊠	No □	Ref	ference No: EPBC 2012/6689		
Has the applicant demonstrated occupancy (proof of occupier status)?		Yes ⊠	No □	Min	ning lease / tenement ⊠		
Has the applicant obtained all relevant planning approvals?		Yes □	No □ N/A ⊠	Exp	oroval: biry date: N/A explain why? Devloped on hing lease.		
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?		Yes □	No ⊠	Cle	aring managed under MS 993		
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?		Yes □	No ⊠		olication reference No: ence/permit No:		
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?		Yes □	No ⊠	Lice	ence / permit not required.		

Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ⊠ No □	Name: Pilbara Groundwater Area Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes No N/A Regional office: North West
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes □ No ⊠	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes □ No □ N/A □
Is the Premises subject to any other Acts or subsidiary regulations (e.g. Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx)	Yes ⊠ No □	Environmental Protection (Rural Landfill) Regulations 2002
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes □ No ⊠	
Is the Premises subject to any EPP requirements?	Yes □ No ⊠	
Is the Premises a known or suspected contaminated site under the Contaminated Sites Act 2003?	Yes □ No ⊠	