



Application for Works Approval

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

Works Approval Number W6917/2024/1

Applicant Iluka Rare Earths Pty Ltd

ACN 654 487 662

File number DER2024/000129

Premises Eneabba Mine Site
Tenement M267SA, Brand Hwy
Shire of Carbanah, WA

As defined by the premises map attached to the issued works approval

Date of report 16/07/2024

Decision Works approval granted

**MANAGER, RESOURCE INDUSTRIES
INDUSTRY REGULATION (STATE-WIDE DELIVERY)**
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary and overview of premises	1
2.2.1 Proposed works	1
2.2.2 Inputs	5
2.2.3 Outputs	5
2.3 <i>Mineral Sands (Enneaba) Agreement Act 1975</i>	6
3. Risk assessment	6
3.1 Source-pathways and receptors	7
3.1.1 Emissions and controls	7
3.1.2 Receptors	10
3.2 Risk ratings	13
4. Consultation	17
5. Conclusion	17
References	18
Appendix 1: Summary of applicant’s comments on risk assessment and draft conditions	19
Table 1: Anticipated sewage influent quality	5
Table 2: WWTP treated effluent target concentrations	5
Table 3: Effluent specifications and spray field sizing	6
Table 4: Proposed applicant controls	7
Table 5: Sensitive human and environmental receptors and distance from prescribed activity	10
Table 6: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation	14
Table 7: Consultation	17
Figure 1: L9369/2023/1 Premises boundary	3
Figure 2: Wastewater treatment plant site layout	4
Figure 3: Distance to sensitive receptors	12

1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6917/2024/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 and overview of premises

On 8 March 2024, Iluka Rare Earths Pty Ltd (the applicant) applied to DWER for a works approval under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application relates to the construction and installation of a wastewater treatment plant facility and irrigation sprayfield (Category 85 – Sewage facility) at the existing mine site premises (L9369/2023/1). The premises is approximately 5.4 km south-east of the town of Eneabba.

The premises relates to Category 85: Sewage facility under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) with an assessed capacity of 45 cubic metres per day. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W6917/2024/1.

Once construction works, compliance certification and DWER sign-off has been completed, the operational aspects from the works approval will be transitioned onto Licence L9369/2023/1 which is in place for the Eneabba Rare Earths Refinery. These changes will be progressed via a separate licence amendment application.

2.2.1 Proposed works

The proposed wastewater treatment plant (WWTP) will form part of the facilities being developed at Eneabba Rare Earth Refinery (ERER). The Eneabba mine site has been in operation since 1975 in accordance with the *Mineral Sands (Eneabba) Agreement Act 1975*.

The WWTP has been designed to treat up to 45 m³ per day of sewage generated from the ERER. Inputs will be received from offices, change rooms and ablutions. This will support a workforce of up to 900 individuals during the construction of the Eneabba Rare Earths Refinery under Works Approval W6641/2022/1 and 300 during operations.

The WWTP will be a containerised modular system, which uses the anaerobic-anoxic-aerobic treatment method (A2O method) designed to remove nitrogen and phosphorus from sewage. The treated wastewater will be pumped to spray fields and disposed of through land irrigation.

Key infrastructure and equipment of the system include;

- Inlet bar screen;
- Balance pump and 22 kL balance tank;
- A2O Process comprising 3 x submersible aerators;
- Sludge pumps;
- Recirculation pump with online chlorine dosing;

- Sodium hypochlorite dosing system;
- Poly aluminium chloride dosing system;
- 13 kL sludge storage tank;
- 50 kL irrigation tanks and outlet;
- Irrigation pumps;
- Discharge flow meter;
- Control panel;
- Audible visual alarm;
- Interconnecting pipework;
- Access ladder and high level platform;
- Sewage pump station; and
- Above ground hammer cast iron type spray field sprinklers, irrigation pump (two strand wire fencing around spray field, lockable gate, safety signage, individual branch line flush valves).

Treated effluent will be irrigated to an agricultural pasture seeded with animal feed. Annually, the pasture growth will either be slashed or grazed by sheep. Figure 1, below, depicts the premises boundary and Figure 2 depicts the wastewater treatment plant site layout.

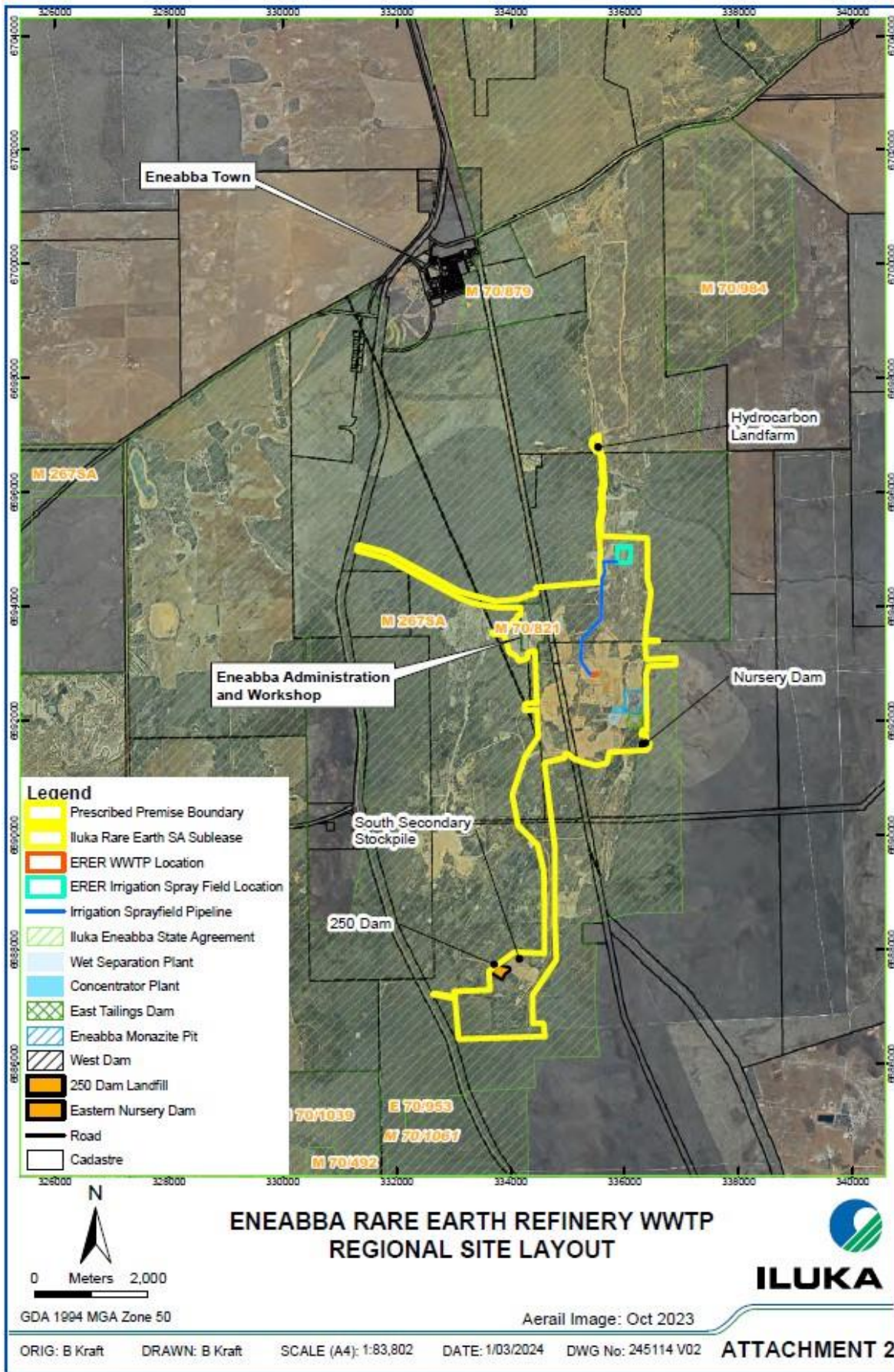


Figure 1: L9369/2023/1 Premises boundary

Works Approval: W6917/2024/1

IR-T13 Decision report template (short) v3.0 (May 2021)

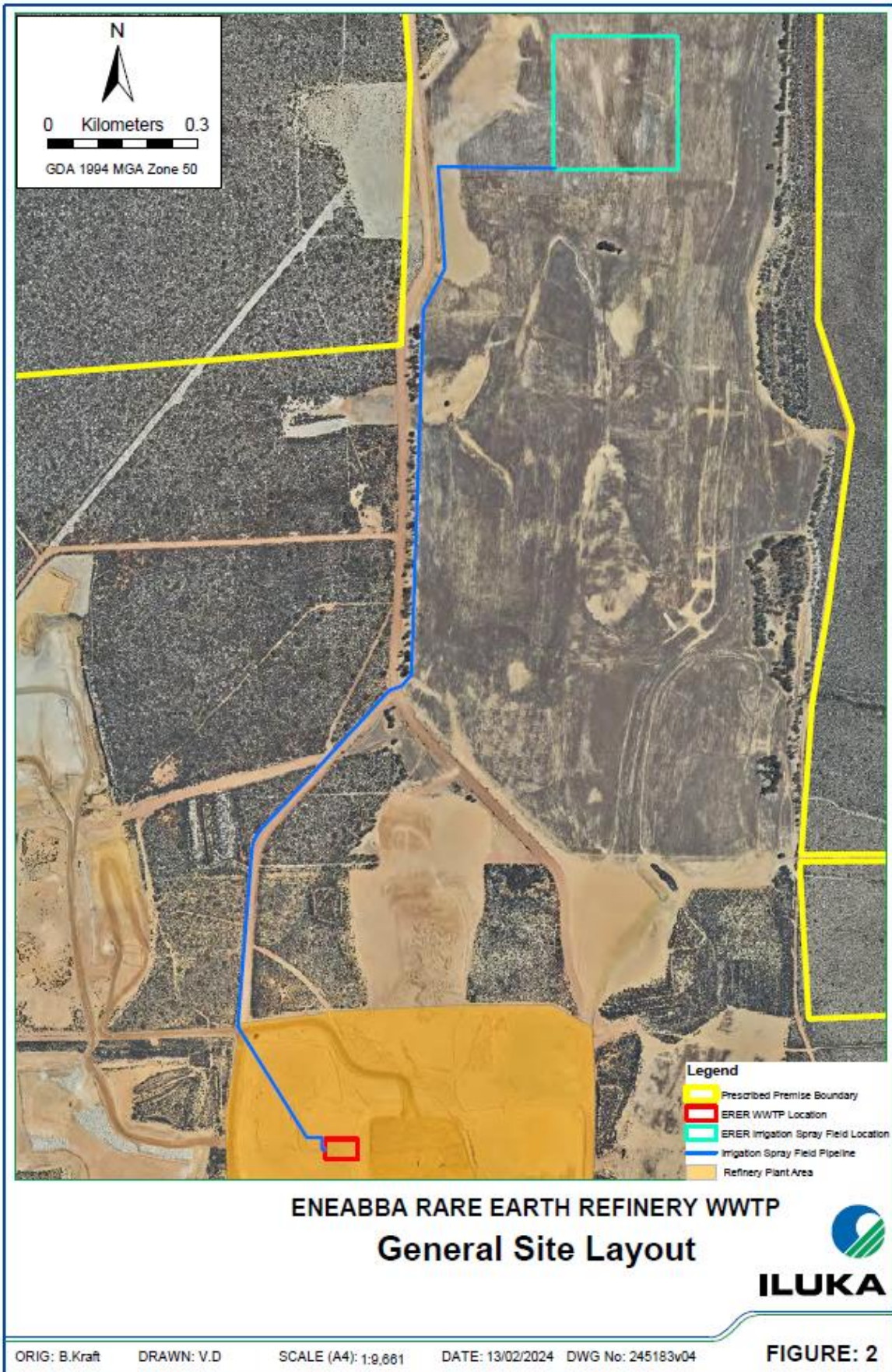


Figure 2: Wastewater treatment plant site layout

2.2.2 Inputs

The expected quality of sewage influent received by the WWTP is shown in Table 1.

Table 1: Anticipated sewage influent quality

Parameter	Concentration target
pH	6.5-8.5
Total Nitrogen (TN)	60 mg/L
Total Phosphorus (TP)	12 mg/L
Total Suspended Solids (TSS)	300 mg/L
Biological Oxygen Demand (BOD)	300 mg/L

The treatment process at the WWTP will also use the following chemical inputs:

- Sodium hydroxide dosing for pH balancing;
- Sodium hypochlorite dosing for disinfection; and
- Poly aluminium chloride dosing for improved flocculation.

Chemicals will be stored in impermeable bunds or be stored in sealed bunded tanks or containers.

2.2.3 Outputs

The WWTP aims to treat sewage to the concentrations set out in Table 2 below, before pumping the effluent via an above ground pipe to an irrigation spray field for disposal.

Sludge produced in the WWTP will be collected in 13 kL storage tanks. This will be periodically removed and disposed of off-site at a licensed facility. Sludge collection, transport and disposal will take place in accordance with the *Environmental Protection (Controlled Waste) Regulations 2004 (Controlled Waste Regulations)*.

Table 2: WWTP treated effluent target concentrations

Parameter (unit)	Concentration target
BOD	<20 mg/L
TSS	<30 mg/L
TN	<30 mg/L
TP	<8 mg/L
Escherichia coli	<1,000 cfu/100 mL
Residual free chlorine	0.2-2.0 mg/L
pH	6.5-8.5

Based on soil type information for the area, the applicant considered soils at the sprayfield to be coarse grained soils (e.g. sands and gravels). The location is also considered to have a low

eutrophication risk of surface waters within 500 metres. This corresponds to a risk category B in accordance with *Water Quality Protection Note 22: Irrigation with nutrient-rich wastewater*, with maximum nutrient application rates for nitrogen and phosphorus being 180 kg/ha/year and 20 kg/ha/year respectively. The expected annual nutrient loading and the spray field area required are provided in Table 3 below.

Table 3: Effluent specifications and spray field sizing

Item	Value
Nitrogen loading	
Daily flow rate	45 m ³ /day
Total TN in effluent	486 kg/year
Total TN allowed per ha (soil category B)	180 kg/ha/year
Irrigation area required	2.7 ha
Irrigation area proposed	6.5 ha
Phosphorus loading	
Daily flow rate	45 m ³ /day
Total TP in effluent	129.6 kg/year
Total TP allowed per ha (soil category B)	20 kg/ha/year
Irrigation area required	6.48 ha
Irrigation area proposed	6.5 ha

Based on the above, the applicant has proposed to install a 6.5 hectare spray field that consists of vegetation suitable for use as animal feed.

The applicant has indicated that commissioning of the WWTP is proposed to commence for three months upon the completion of construction. Time-limited operations has also been requested for 180 days to allow for the assessment and determination of a licence application.

2.3 Mineral Sands (Enneaba) Agreement Act 1975

The WWTP and irrigation sprayfield is necessary support infrastructure to the mining of mineral sands and the production of heavy metals approved under the *Mineral Sands (Eneabba) Agreement Act 1975*.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

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

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this decision report are detailed in Table 4 below. Table 4 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 4: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Dust	<p>Vehicle movements on unsealed access roads during construction.</p> <p>WWTP pad construction and plant placement.</p> <p>Installation of discharge pipeline and irrigation sprayfield sprinklers.</p>	Air / windborne pathway	<ul style="list-style-type: none"> Any earthworks required during construction will be restricted to only areas required for construction activities; Vehicles and earth moving equipment will keep to defined roads; Dust suppression (water sprays, water trucks, control of vehicle movements/ restricted speeds) will be employed during construction if required; Opportunistic inspections for dust emissions during mobilisation, installation/construction; and An incident reporting system will be maintained to assist in managing environmental incidents such as excessive dust emissions.
<p>Sediment laden stormwater</p> <p>Contaminated stormwater from contact with treated or untreated effluent</p>	<p>Vehicle movements on unsealed access roads.</p> <p>WWTP pad construction and plant placement.</p> <p>Stormwater interaction during operation of WWTP and irrigation sprayfield</p>	Overland runoff	<ul style="list-style-type: none"> Design of drainage infrastructure based on modelling will maintain offsite natural surface water flows as much as possible; and Stormwater will be diverted from active areas to natural downstream drainage in a way that prevents increased rates of sedimentation and erosion.
Unauthorised discharge of hydrocarbons & treatment chemicals	Storage and handling of treatment chemicals	<p>Spills and leaks to land and overland contaminated runoff</p> <p>Migration via soil to groundwater</p>	<ul style="list-style-type: none"> Liquid chemicals, including hydrocarbons will be stored in designated areas and on self-bunded facilities; Storage will be in accordance with the Dangerous Goods Safety Act 2004 and fuel storage and handling will be in accordance with Australian Standards (AS 1940); Refuelling restricted to dedicated

Emission	Sources	Potential pathways	Proposed controls
			<p>refuelling areas;</p> <ul style="list-style-type: none"> • Spill kits will be located at all hydrocarbons and chemical storage on site to ensure immediate clean-up of any spills; and • Soil contaminated by hydrocarbons will either be treated in-situ or removed by a controlled waste contractor for disposal offsite to an appropriate licensed facility; • Potentially contaminated waters retained within the work front via culverts, levees and surface diversion; • Regular inspections of fuel and chemical storage areas; and • Spillages occurring as a result of incident or equipment failures will be addressed and reported through the Iluka Incident Reporting Procedure.
<p>Raw partially treated sewage</p> <p>or</p> <p>Treated effluent</p>	<p>Commissioning and operation of the WWTP</p>	<p>Over topping and leaks causing overland contaminated runoff</p> <p>Migration via soil to groundwater</p>	<ul style="list-style-type: none"> • All storage components will be impermeable; • Components of the WWTP will be fitted with alarms to warn of high-water levels in the tank or if pump failure occurs. The units can be isolated and shut down if required; • WWTP balance tank will have contingency storage capacity for up to 1 day of normal flow via internal overflow system; • Appropriate management of surface water flows within and around the ERE area will be implemented as required will reduce potential for contaminants to enter surface water; • Spill kits will be made available at the chemical storage locations and employees trained in their use; • The sludge will be removed periodically from the sludge tank by a licensed carrier and taken offsite for disposal to an appropriately licensed facility in accordance with the Environmental Protection (Controlled Waste) Regulations 2004; • Operate WWTP in accordance with

Emission	Sources	Potential pathways	Proposed controls
			<p>manufacturers specifications;</p> <ul style="list-style-type: none"> • Maintain good housekeeping practices; and • Repairs and maintenance to the WWTP and associated infrastructure will be undertaken by suitably qualified personnel and/or contractors.
<p>Raw or partially treated sewage</p> <p>Treated effluent</p>	<p>Commissioning and operation of the irrigation pipeline and sprayfield</p>	<p>Direct discharge to land, spray drift, pooling and overland runoff</p> <p>Migration via soil to groundwater</p>	<ul style="list-style-type: none"> • The irrigations spray field will be fenced, sign posted and includes a spray drift buffer; • Suitable storage will be maintained in the treated wastewater tank in case irrigation cannot occur for several days; • Irrigation will not occur during significant rainfall events to prevent potential unauthorised discharge to surface water flows; • Effluent is disposed of to a dedicated irrigation field by an automated system that is managed by a trained operator. The trained operator will be responsible for the disposal of effluent to the conditions present; • The irrigation spray field is located over 3.1 km from the Eneabba Water Reserve; • Components of the WWTP will be regularly inspected, and discharge suspended if it is discovered operating below the established standard; and • Regular monitoring of the WWTP irrigation water prior to discharge to ensure discharge compliance. • To maintain the integrity of the treated effluent, measures are taken to adhere to specific hydraulic application rates, ensuring that the application of water onto the land surface does not exceed 4 mm to prevent pooling.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation. Table 5 and Figure 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 5: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Eneabba Town Site	7.1 km north of the WWTP and 5.4 km north of the irrigation spray field. The town is comprised of residential premises, Eneabba Primary School, camping grounds, a tavern, an ex-mining village accommodation, an airport and recreational activities including a golf course. Ruled out for risk assessment (Table 6) due to proximity to the prescribed activity.
Environmental receptors	Distance from prescribed activity
Eneabba Water Reserve (Priority 1)	The Eneabba town water supply (Priority 1 and 2 Eneabba Water Reserve) uses the regional aquifer (Yarragadee aquifer), and the current point of abstraction and reserve boundary for incompatible activities is located approximately 4.2 km north of the irrigation spray field and 6.1 km north of the WWTP. Ruled out for risk assessment (Table 6) due to proximity to the prescribed activity.
Eneabba Water Reserve (Priority 2)	The boundary of the P2 Water reserve is located approximately 1.6 km north of the irrigation spray field and 3.7 km north of the WWTP. There are no town water supply bores within the P2 water reserve.
Threatened Ecological Community	The buffer for the Ferricrete floristic community (Rocky Springs Ferricrete/Type) is 300 m southwest of the WWTP and 1.6 km southwest of the irrigation spray field. With the TEC 5.5 km west of WWTP and 7 km southwest of the irrigation spray field. Ruled out for risk assessment (Table 6) due to proximity to the prescribed activity.
Minor surface water creek line	700 m north east of the irrigation sprayfield.
An intermittent wetland system	One basin (Wetland # 10 b) is 1.1 km southwest of the WWTP.
South Eneabba Nature Reserve	2.6 km west of the WWTP and 3.5 km southwest of the irrigation spray field. The reserve is within the State Agreement Lease and contains an area which was previously mined. Ruled out for risk assessment (Table 6) due to proximity to the prescribed activity.
Groundwater – Superficial aquifer - Arrowsmith Groundwater area,	Depth to groundwater is >10 metres below ground level. The superficial formations are unsaturated at Eneabba because of the deep regional watertable (about 31 m below ground level).

<p>Eneabba Plains subarea Yarragadee</p>	<p>The Yarragadee Formation forms a major multi-layered aquifer in the region and is part of an extensive regional groundwater flow system that contains large volumes of fresh to slightly brackish groundwater in storage. The aquifer is unconfined where the superficial formations are unsaturated (as is the case at Eneabba wellfield). Groundwater flow is generally in a west to north-west direction.</p>
<p>Native vegetation</p>	<p>Remnant native vegetation within the licence boundary of mixed heath with scattered tall shrubs <i>Acacia spp.</i>, <i>Proteaceae</i> and <i>Myrtaceae</i>.</p>

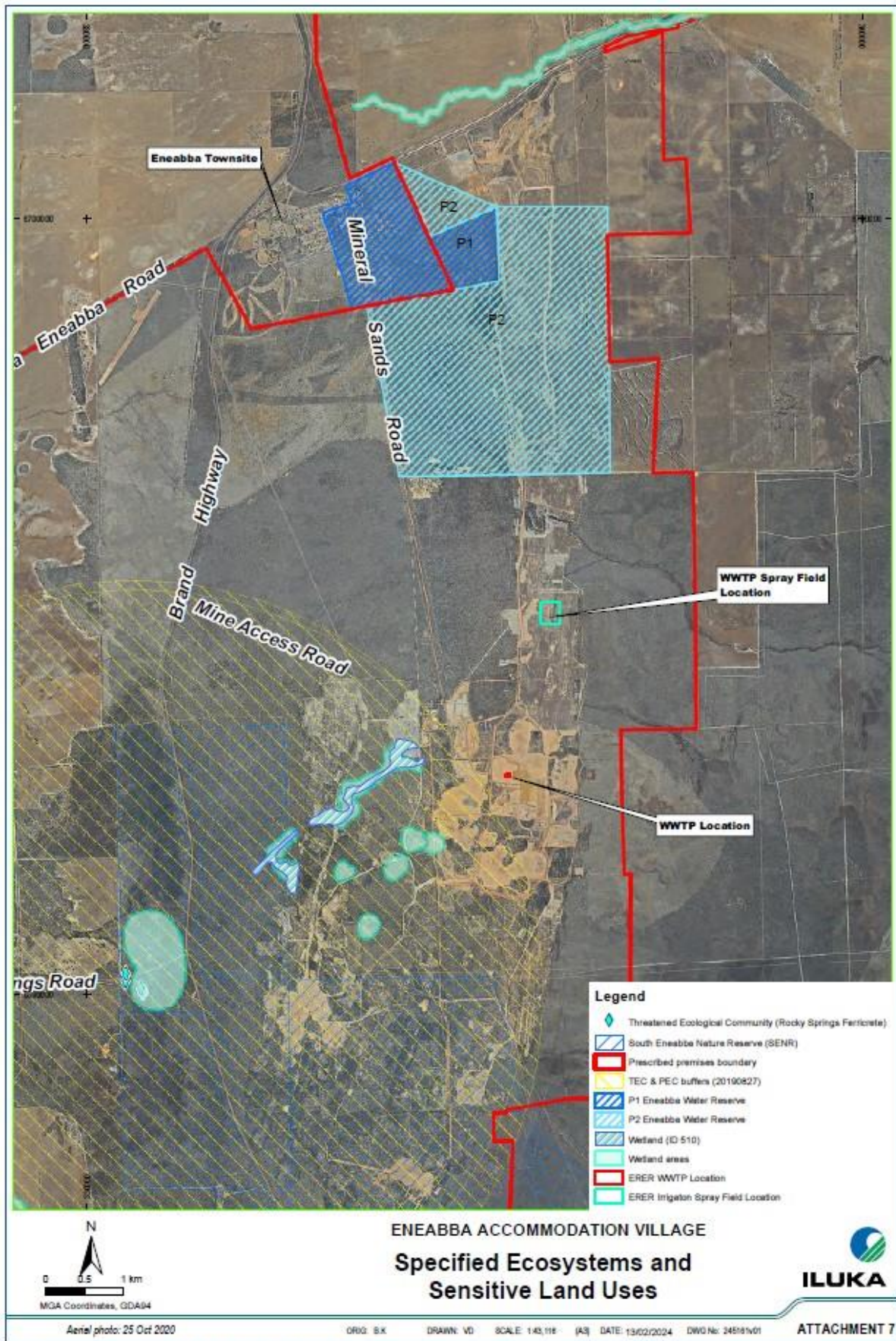


Figure 3: Distance to sensitive receptors

Works Approval: W6917/2024/1

IR-T13 Decision report template (short) v3.0 (May 2021)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source 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 applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 6.

Works approval W6917/2024/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 6 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 i.e. Sewage facility and irrigation sprayfield. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 6: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Wastewater Treatment Plant								
Vehicle movements on unsealed access roads during construction.	Dust	Air / windborne pathway causing impacts to vegetation and surface water	Native vegetation	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	N/A	N/A
WWTP pad construction and plant placement.	Sediment laden stormwater	Overland runoff	Intermittent wetland system	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1, 5 and 12	N/A
Storage and handling of treatment chemicals at WWTP	Hydrocarbon & treatment chemicals	Spills and leaks to land and overland contaminated runoff	Native vegetation	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1, 17 and 18	N/A
		Migration via soil to groundwater	Arrowsmith Groundwater area	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y		
Equipment failure during commissioning and operation of the wastewater treatment plant	Raw, partially, and treated sewage	Over topping and leaks causing overland contaminated runoff	Native vegetation	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 1, 5, 12, 17 and 18	N/A
	Treated effluent	Migration via soil to groundwater	Intermittent wetland system Arrowsmith Groundwater area	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y		

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Stormwater interaction during operation of WWTP	Contaminated stormwater from contact with treated or untreated effluent	Overland runoff containing elevated nitrogen and phosphate	Native vegetation Intermittent wetland system	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Conditions 1, 5 and 12	N/A
		Migration via soil to groundwater	Arrowsmith Groundwater area	Refer to Section 3.1	C = Moderate L = Rare Medium Risk	Y		
Irrigation sprayfield								
Installation of discharge pipeline and irrigation sprayfield sprinklers.	Dust	Air / windborne pathway causing impacts to health and amenity	Minor creek line	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	N/A	N/A
	Sediment laden stormwater	Overland runoff	Native vegetation	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Condition 1, 5 and 12	N/A
Equipment failure during commissioning and operation of irrigation sprayfield	Raw or partially treated sewage Treated effluent	Direct discharge to land, spray drift, pooling and overland runoff causing nutrient overloading.	Minor creek line Native vegetation	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 5 and 12	N/A
		Migration via soil to groundwater	Arrowsmith Groundwater area	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y		
		Migration through groundwater causing impacts to beneficial use	Eneabba P2 water reserve	Refer to Section 3.1	C = Major L = Rare Medium Risk	Y		

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Stormwater interaction during operation of irrigation sprayfield	Contaminated stormwater from contact with treated or untreated effluent	Overland runoff containing elevated nitrogen and phosphate	Minor creek line Intermittent wetland system	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 1, 5 and 12	N/A
		Migration via soil to groundwater	Arrowsmith Groundwater area	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y		
		Migration through groundwater causing impacts to beneficial use	Eneabba P2 water reserve	Refer to Section 3.1	C = Major L = Rare Medium Risk	Y		
Irrigation of treated wastewater to land	Treated effluent Partially or untreated effluent discharge	Surface runoff and seepage to soil and groundwater resulting in elevated nutrients levels	Minor creek line Intermittent wetland system Arrowsmith Groundwater area	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk		Conditions 1, 5, 12, 13 and 14	N/A
		Migration through groundwater causing impacts to beneficial use	Eneabba P2 water reserve	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk		Conditions 1, 5, 12, 13 and 14	N/A

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

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 7 provides a summary of the consultation undertaken by the department.

Table 7: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 6 May 2024	None received	N/A
Shire of Carnamah advised of proposal on 8 May 2024	None received	N/A
Department of Health (DoH), advised of proposal on 8 May 2024	<p>Department of Health replied on 23 May 2024, stating the following:</p> <p>Disposal of wastewater generated on site is required to comply with the <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>.</p> <p>Sewage intended to be or recycled for beneficial purposes such as agricultural irrigation, will require prior approval from the DoH. Please refer to the "Application Process for approval of a recycling water scheme": https://ww2.health.wa.gov.au/Articles/A_E/Application-process-for-approval-of-recycling-water-scheme</p> <p>Any non-drinking water (i.e., water that is not intended or suitable for drinking) must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration suitable backflow prevention arrangements in accordance with Australian/New Zealand Standards AS3500 – Plumbing and Drainage.</p>	Noted. The applicant confirmed an application for approval to construct a WWTP from the Department for Health will be undertaken.
Applicant was provided with draft documents on 25 June 2024	The applicant provided responses to final comments by the department (refer to Appendix 1) and requested to waive the remaining 21-day comment period.	Refer to Appendix 1 for details to department responses and the remaining comment period was waived.

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Section/Condition	Summary of applicant's comment	Department's response
Draft Decision Report		
Section 4, Table 7. 1. Applicant to confirm application with the DoH.	Iluka confirmed that an application for approval to construct a WWTP from the Department for Health will be undertaken.	Noted.
Draft Works Approval		
Schedule 1, Figure 4 1. Applicant to update with chemical storage location.	In response to 21-day comments, the applicant provided updated figure <i>Waste Water Treatment Plant General Arrangement IWS-ME-10-1075-01</i> .	Figure 4 updated.
Schedule 2, Tables 9 to 11 2. Applicant to provide a co-ordinate in a central position in the WWTP. Boundary co-ordinates for the spray field and pipeline alignment.	In response to 21-day comments, the applicant provided the coordinates for the Prescribed Premises boundary, wastewater treatment plant, pipeline route and sprayfield.	Coordinates added to Schedule 2 (Tables 9 to 12).