



Application for Works Approval

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

Works Approval Number	W6919/2024/1
Applicant	Covalent Lithium Pty Ltd
ACN	70 623 090 139
File number	DER2024/000078
Premises	Earl Grey Lithium Project Marvel Loch-Forrestania Road MOUNT HOLLAND Legal description Mining Tenement M77/1080 As defined by the Premises map in Schedule 1 and the coordinates in Schedule 2 of the issued Works Approval
Date of report	22 August 2024 (FINAL)
Proposed Decision	Works approval granted

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the for works approval construction and operation of the premises. As a result of this assessment, works approval W6919/2024/1 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 20 February 2024, the applicant applied for a works approval under section 54 of the *Environmental Protection Act 1986* (EP Act). The application is to undertake construction works and time limited operation relating to dewatering activities, including installation and operation of pumps, pipelines, and a water storage tank at the Earl Grey Lithium Project (the premises).

The premises relates to Category 6: *Mine dewatering* under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which is defined in works approval W6919/2024/1. 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 W6919/2024/1.

2.3 Proposed Dewatering Activities

The premises is approximately 71 km north-east of Holt Rock on mining tenement M77/1080. The site is a new development with no known previous mining activities done in the area. For the purpose of dewatering the applicant has obtained a 5C licence to abstract water 520,000 KL annually for the project under GWL205547 (obtained under the *Rights in Water and Irrigation Act 1914* (RIWI Act)).

Covalent Lithium Pty Ltd has recently commenced mining of the Earl Grey pit and dewatering is required to access ore below water table. The proposed activity involves the construction of a dewatering pipeline, pumps, and a water storage. The proposed locations of the pipeline and the water storage are shown in Figure 1.

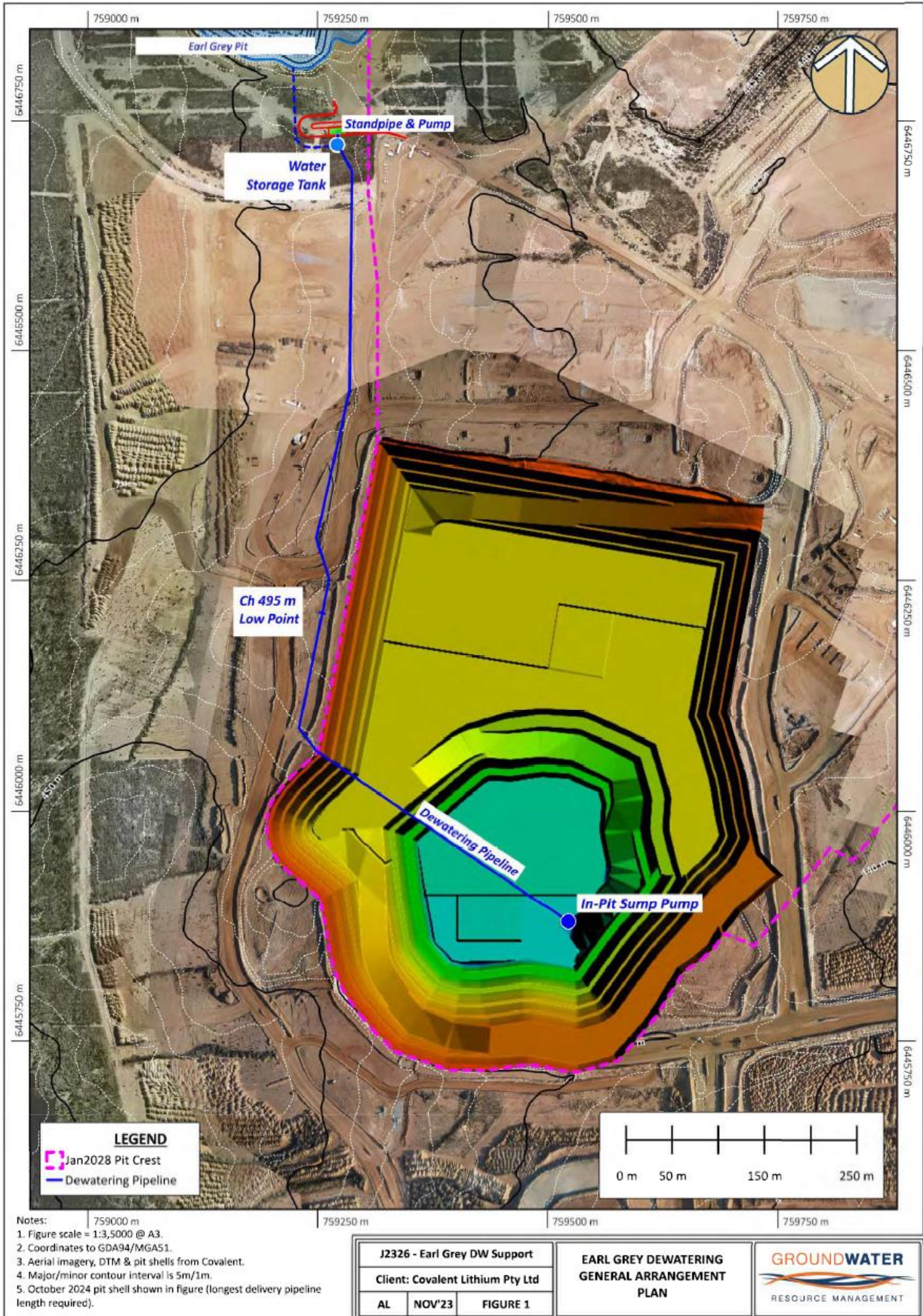


Figure 1: Site infrastructure layout

2.4 Dewatering Discharge Options

2.4.1 Discharge to water storage

Above ground storage tank:

The sump pump and pipeline will deliver in-pit water to the above-ground tank located immediately south of the Earl Grey Pit (EGP) void, as shown on Figure 2. The tank will be sized to accommodate approximately 2 days storage of water at a pumping rate of 5 L/s (~1,000kL). The tank will be constructed on a compacted sand floor. The tank will have an inlet, outlet, and overflow flanges. The tank overflow will report to an approximately 120 m long HDPE lined overflow pipeline that reports to the EGP at about 445.0 mAHD.

2.4.2 Discharge to the Earl Grey Pit

The applicant intends to use the EGP to discharge excess dewatering, beyond that being held in the initial water storage arrangements (detailed above). The EGP has a capacity of 1,280 ML to the 445mRL. Figure 2 shows the overflow pipelines route from the water storage arrangement to the EGP.

The EGP has been approved as a designated discharge location as per the mining proposal approved by the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS).

2.4.3 Dust suppression activities

The project has multiple operations, constructions projects, and substantial vehicle movements which will require water for dust suppression depending on road usage, speed limit and climatic season. While a significant proportion of the dewatering water will be used for these purposes it will not manage the total volume of water that will be dewatered (refer to Section 2.4.5 for water balance details). A standpipe and pump will be located adjacent to the water storage arrangements (Figure 2 and 3). This will draw water from the water tank at a maximum of 45L/s and fill water carts as required.

The applicant intends to monitor the dewatering water to ensure salinity levels are appropriate for dust suppression, Electrical Conductivity (EC) limit of 120,000 uS/cm or 66,000mg/L will be applied as an upper limit for dust suppression. Approximately 10m³/hr of water is required for dust suppression which will be obtained from the dewatering storage and the south ventilation raise.

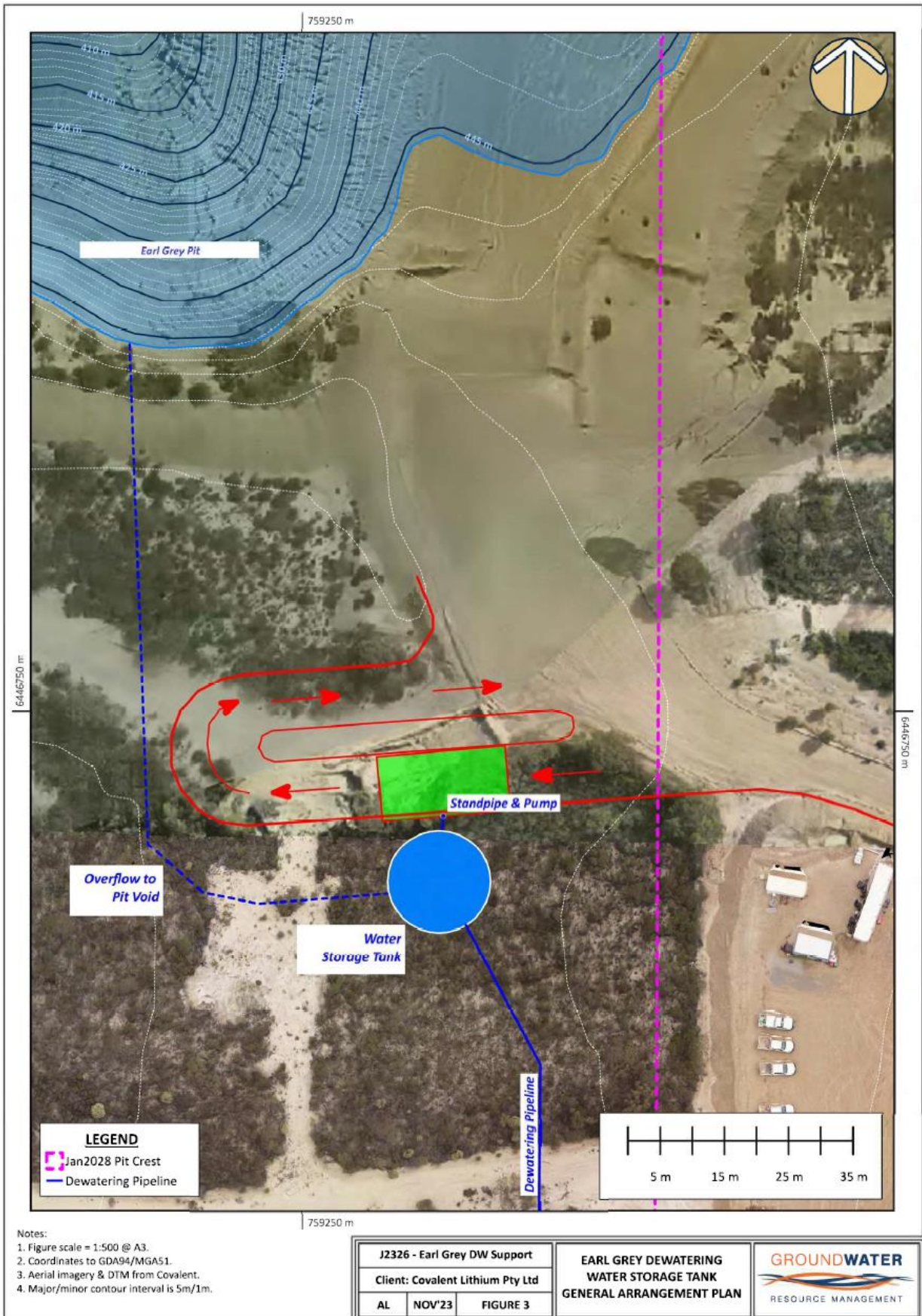


Figure 2: Water storage tank option and associated infrastructure

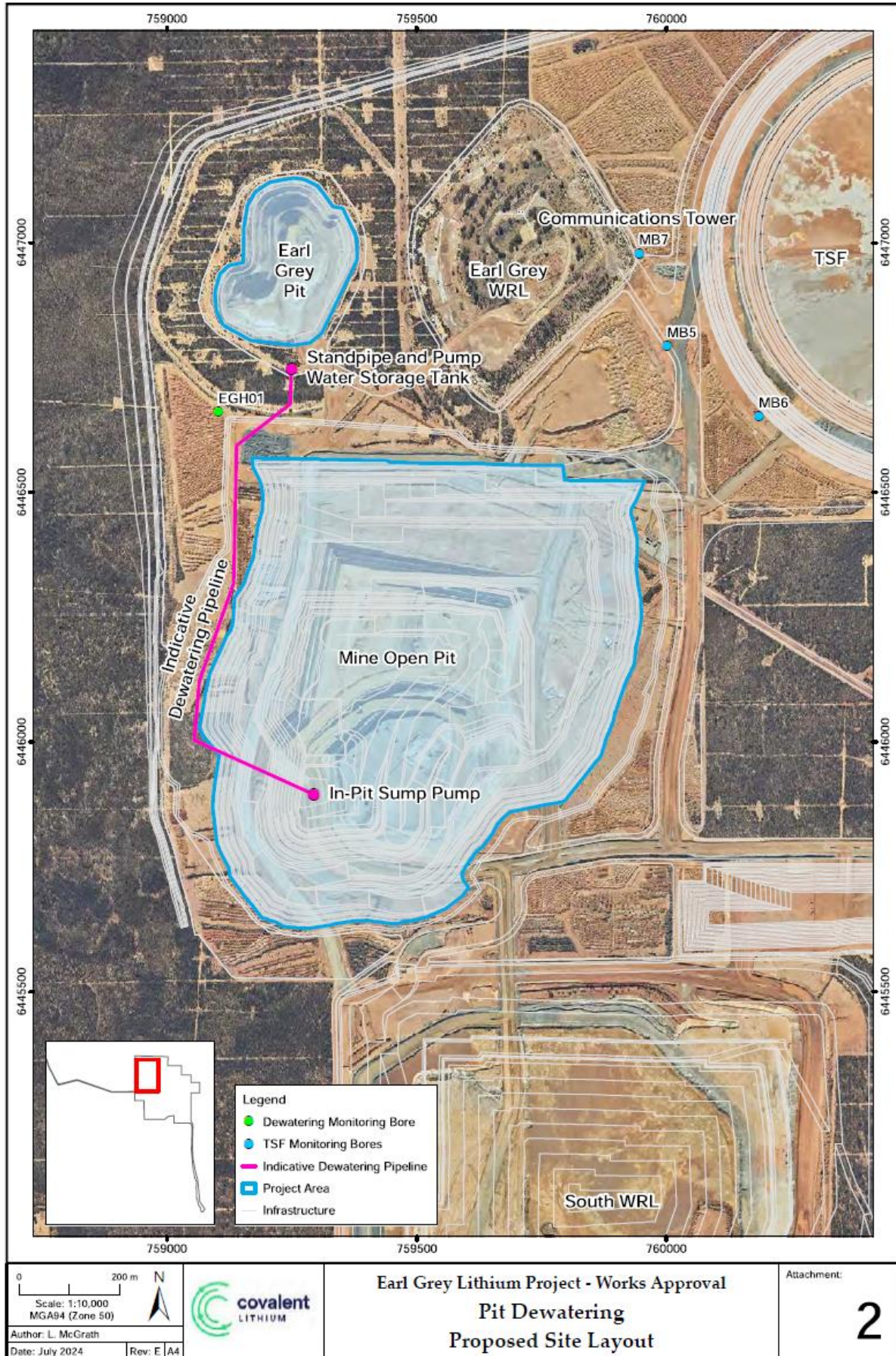


Figure 3: Layout of dewatering pipeline and dewatering bores.

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

2.5 Groundwater Quality

Regional groundwater in the premises is typically saline to hypersaline with the groundwater in the area having a Total Dissolved Solids (TDS) ranging between 7,640 and 119,000 mg/L TDS which is not suitable for livestock drinking. The water table ranges from 58 to 70 mBGL. Groundwater within the Disturbance Envelope flows in a north-easterly direction with the exception of the lower east portion of the Disturbance Envelope, which flows in a south easterly direction.

Previous investigations by the applicant identify that the groundwater is classified as very hard with elevated concentrations of bicarbonate, calcium and magnesium with sodium and chloride identified as the dominant ions. The groundwater was reported as neutral to slightly alkaline with pH values varying between 7.23 and 8.16.

The groundwater quality has been collected from the Earl Grey Historical Bore (EGH01). The groundwater quality at the EGP is similar to the abstracted groundwater in the Earl Grey Lithium Pit (EGLP) and is expected to have minimal impact on groundwater quality at the EGP.

2.6 Water Balance

The water storage is expected to be constructed towards the end of 2024 and initial discharge will be directed to the EGP at a rate of 27m³/hr. During the summer months there is an expected higher usage of water for dust suppression. A modelling assessment on the EGP water balance storage has been undertaken by Groundwater Resource Management (2023) predicts that the EGP could potentially have developed a pit lake that rises to around 427mRL, which would be 12 m below the maximum operating level and 17 m below the pit crest.

A sensitivity run was also undertaken which proposed a rare event using the design rainfall event of 148 mm. The rare event simulation used rainfall data for the wettest 5-year period for Lake Carmody. If the rare event is assumed to occur, then the pit lake could potentially rise to around the maximum operating level (439 mRL) after 4 years. Although this level would be high, it would still be about 5 m below the EGP pit crest.

The average level that the pit is predicted to hold around 571,321 m³ of water. Assuming the rare event case were to occur, this volume could double to about 1,000,000 m³. Both the average level and rare event estimates are considered conservative as they do not include seepage losses from the pit, although these are likely to be modest. The chances of the EGP void filling to capacity within the first four years of mining are considered remote. Figure 4 show the estimated flows being discharged to the water storage, open pit, and for use in dust suppression.

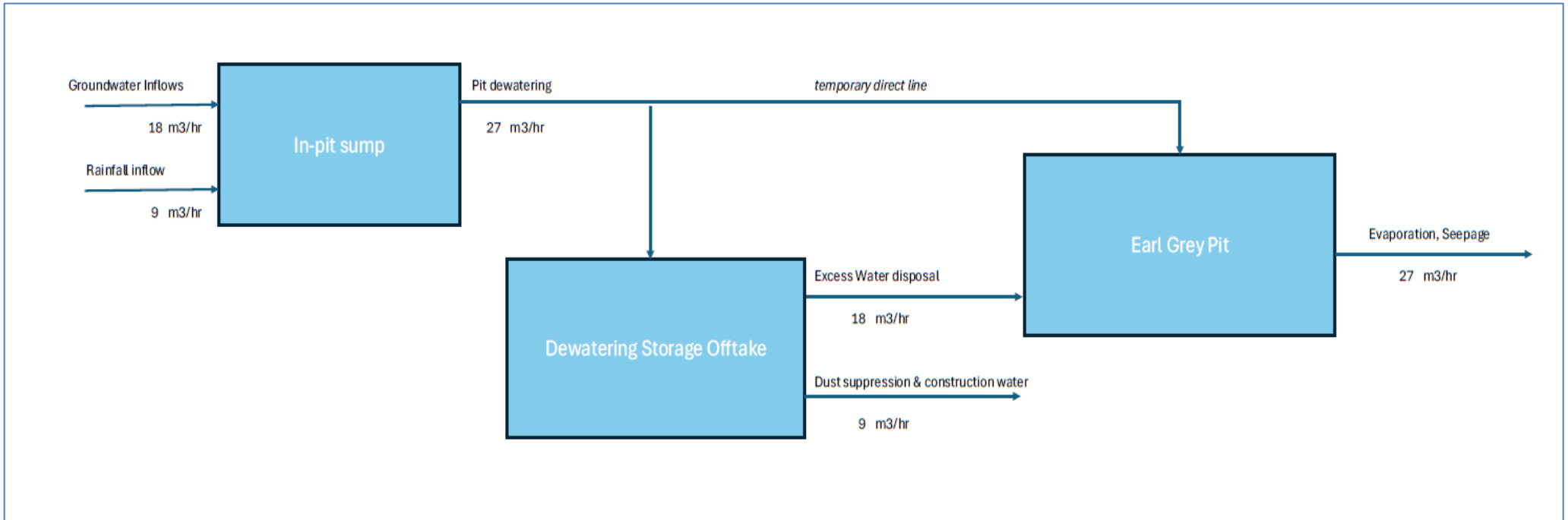


Figure 4: Water balance schematic

2.7 Part IV of the EP Act

The Earl Grey Lithium Project was referred to the Environmental Protection Authority (EPA) by Kidman Resources Limited (the original proponent) in May 2017. The proposal was to develop a pegmatite-hosted lithium deposit at the abandoned Mt Holland mine site. Covalent Lithium Pty Ltd was authorised to develop the Earl Grey Lithium Project under Ministerial Statement (MS) 1118, which was published in 2019, and a subsequent MS 1167 in 2021.

The applicant later submitted a revised proposal to the EPA that included significant amendment to MS 1118, to incorporate construction and operation of a solar plant (including an added 32 ha of native vegetation clearing), variation to the airstrip width (including an added 24 ha of native vegetation clearing), changes to the tailing waste disposal methodology from 'dry' to 'wet' tailings, co-disposal of inert refinery waste generated from the Kwinana Lithium Refinery to the approved waste rock landform, and modification to flora and fauna exclusion areas. Ministerial Statement for the Revised Proposal 1199 was published on 23 November 2022.

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 / operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
<i>Dust</i>	<i>Construction of the pipeline and water storage arrangement</i> <i>Vehicle movement</i>	<i>Air/windborne</i>	<ul style="list-style-type: none"> • <i>Minimising open areas.</i> • <i>Restricting all vehicles to designated routes with speed limits strictly enforced.</i> • <i>Using water trucks and/or non-water stabilisers to suppress dust on roads and laydown areas.</i> • <i>Visual inspections to ensure dust control measures are working.</i> • <i>Vegetation health monitoring.</i>

Emission	Sources	Potential pathways	Proposed controls
<i>Spills and leaks of hydrocarbons</i>	<i>From vehicles and equipment used in construction phase</i>	<i>Surface runoff Seepage to soil and groundwater</i>	<ul style="list-style-type: none"> <i>Bunds and other spill containment structures will be designed in accordance AS1940 - and contain up to 110% of the largest hydrocarbon storage tank located within the containment area.</i> <i>Any spills are reported as an environmental incident and cleaned up immediately.</i>
Operation			
<i>Hypersaline water</i>	<i>Ruptures or leaks from the dewatering pipeline conveying hypersaline water Leaks from the water storage tank; or overtopping and/or seepage from water storage dam.</i>	<i>Surface runoff Seepage to soil and groundwater</i>	<ul style="list-style-type: none"> <i>Pipelines will be located within bunds to ensure all liquors are captured and are not released into the environment.</i> <i>Effluent pumped to a holding tank south of the Earl Grey Gold Pit with the primary proposed use being for dust suppression.</i> <i>Excess water will be disposed to the Earl Grey (EGP) Pit void.</i> <i>Catch pits or sumps will be constructed along above ground pipeline corridors to ensure leaks or spillages are contained within bunded areas.</i> <i>Daily inspection of pipeline, tank/dam and discharge point when dewatering occurs.</i> <i>Any spills are reported as environmental incident and cleaned up immediately.</i>
<i>Noise</i>	<i>Dewatering pump</i>	<i>Air/windborne pathway</i>	<ul style="list-style-type: none"> <i>Plant and machinery serviced as per Manufacturer's specifications.</i>

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 2 and Figure 5 below provides a summary of potential human and environmental receptors that may be impacted because of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Holt Rock	Is approximately 71 km South-West of the Premises. <i>Note: due to the separation distance, this receptor has been screened out for further consideration in the risk assessment process.</i>
Environmental receptors	Distance from prescribed activity
Aboriginal Sites and heritage Places	The closest identified aboriginal Site is the Split Rocks which is approximately 16km North-West of the Premises. <i>Note: due to the separation distance, this receptor has been screened out for further consideration in the risk assessment process.</i>
Groundwater	Based on previous investigations, depth to the water table ranged from 58 to 70 mBGL. Groundwater is saline to hypersaline with total dissolved solids (TDS) levels varying between 7,640 mg/L and 119,000 mg/L.
Surface water	No major surface water features within 5 km of the site. The only notable surface water feature is a constructed ephemeral drainage line that starts at the northwest tip of the airstrip and runs northeast past the processing plant area. Apart from this constructed drainage line, the Project area does not intersect any other identifiable drainage lines or creeks, with runoff generally occurring as sheetwash in a northeasterly direction.
Threatened and Priority fauna	Several conservation significant fauna species have been found recently (last 5 years) at the site. <i>Leipoa ocellate</i> (Malleefowl) and <i>Dasyurus geoffroii</i> (Chuditch) have been sited within the premises boundary. Managed under MS 1199.
Threatened and Priority flora	Classified threatened (under the WA <i>Biodiversity Conservation Act 2016</i>) and vulnerable (under the EPBC Act) species <i>Banksia sphaerocarpa</i> var. <i>dolichostyla</i> are reported to be present at the site. Managed under MS 1199.
Priority Ecological Communities (PEC)	The prescribed premises lies within the Ironcap Hills vegetation assemblages (Mt Holland, Middle, North and South Ironcap Hills, Digger Rock and Hatter Hill) (greenstone ranges) which is Priority 3 PEC. Managed under MS 1118 and MS 1167.

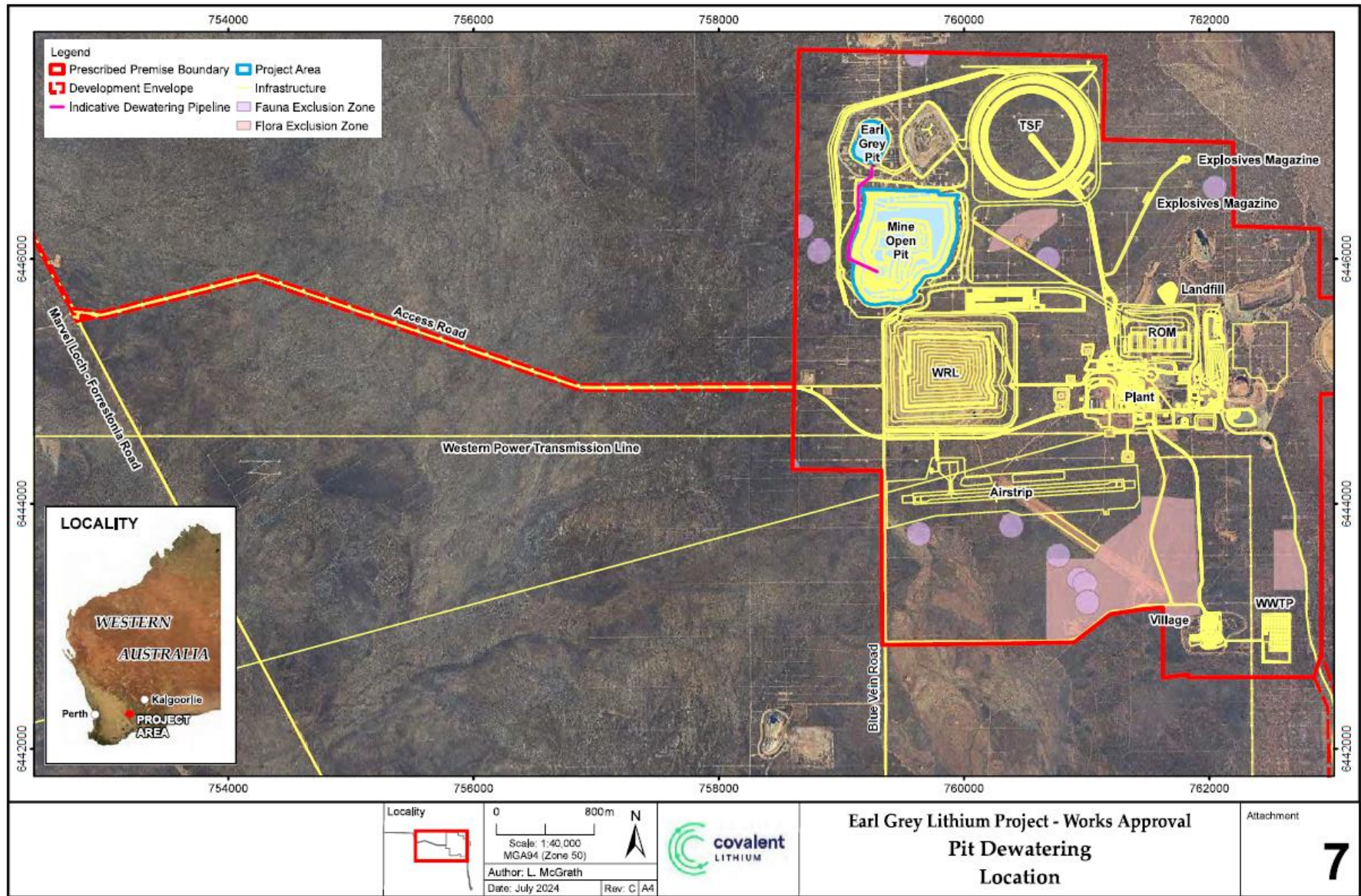


Figure 5: Prescribed premises boundary and fauna and flora exclusion zones

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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 3.

Works approval W6919/2024/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 3 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. mine dewatering activities. 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 3: Risk assessment of potential emissions and discharges from the premises during construction and operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient ?	Conditions ² of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction phase								
Vehicle movement Construction of pipeline, bores, dewatering pumps, sump, and water storage tank	Dust	Pathway: air/windborne Impact: adverse impacts to native vegetation and fauna	Fauna and flora within and near the Project Area.	Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	Condition 2 – Dust management requirements	The applicant's management controls for dust are sufficient in minimising the impact to the environment. Threatened and priority flora and fauna are also managed under MS1199.
	Noise	Pathway: air/windborne Impact: adverse impacts to native fauna	Fauna within and near the Project Area.	Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	Condition 1 - Infrastructure and equipment requirements	The Delegated Officer considers the controls proposed by the applicant including the maintenance of plant equipment in accordance with manufacturers requirements to be sufficient. The construction occurs over a short timeframe and is remote from sensitive residential and/or commercial industrial premises. Any impacts to fauna are considered minor and will be short-lived (temporary). The <i>Environmental Protection (Noise) Regulations 1997</i> also apply.
	Hydrocarbon spills or leaks	Pathway: direct discharge to land; seepage to ground and underlying groundwater; and/or run-off into ephemeral drainage lines Impact: adverse impacts to soils, native vegetation, surface water and/or groundwater quality	Land Underlying groundwater Fauna and flora within and near the Project Area.	Refer to Section 3.1	C = Slight L = Unlikely Medium Risk	Y	N/A	The premises has existing conditions portraying the recovery or disposal of hydrocarbons in an event of spills/leaks. Found in licence L9326/2022/1 (Condition 10). The Delegated Officer finds the existing controls to be sufficient in managing any related emissions or discharges from this proposal. Unintended discharge of hydrocarbons and other harmful

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient ?	Conditions ² of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								materials into the environment is also regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .
	Sediment laden stormwater	Pathway: direct discharge to surface Impact: overland runoff during rainfall events potentially causing ecosystem disturbance offsite	Land Fauna and flora within and near the Project Area.	N/A	C = Slight L = Unlikely Low Risk	N/A	N/A	Minimal sediment emissions are expected on site during construction activities (stormwater runoff during rainfall events). Regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .
Operational phase – Category 6								
Discharge of excess dewatering effluent from the Mine Open Pit to EGP, via the water storage tank	Direct discharge of saline to hypersaline water to the EGP	Pathway: direct discharge to land; seepage to ground and seepage to surrounding groundwater (vertical and lateral migration) Impact: localised impacts to groundwater quality and potential groundwater mounding (potentially affecting local vegetation)	Land Underlying groundwater Native vegetation adjacent to the EGP Fauna and flora within and near the Project Area.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 1 – infrastructure and equipment requirements and <u>Condition 8 - operational requirements for infrastructure and equipment</u> Condition 10 – dewatering volume and water quality monitoring requirements	The delegated officer has found the applicant's controls as generally sufficient to manage the emissions of dewatering discharge to land. Groundwater quality surrounding the EGP is similar to the quality of dewatering water. The water balance for the EGP completed in December 2023 (GRM, 2023) shows that for the base case that water levels in the pit will be maintained at 17m below the pit crest and worst case will be 5m below the pit crest. A 5m freeboard requirement has been adopted for the EGP (Condition 7) as an absolute maximum to prevent overtopping events and prevent groundwater mounding and associated impacts to any nearby deep-rooted vegetation.
	Overtopping of Earl Grey Pit	Pathway: direct discharge to land; seepage to ground and underlying groundwater; and/or run-off into ephemeral drainage lines Impact: localised erosion and/or adverse impacts to						

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient ?	Conditions ² of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		soils, surface water or groundwater quality. Impact: to native vegetation from pooling of discharged water or from waterlogging of soils with saline-hypersaline water						
Dewatering and related conveyance pipelines	Sediment laden and high salinity mine water discharge from pipeline leaks/ruptures	Pathway: direct discharge to land; seepage to ground and underlying groundwater; and/or run-off into ephemeral drainage lines Impact: localised erosion and/or adverse impacts to soils, surface water or groundwater quality Impact: to native vegetation from pooling of discharged water or from waterlogging of soils with saline-hypersaline water	Land Underlying groundwater Fauna and flora within and near the Project Area.	Y	C = Moderate L = Possible Medium Risk	N	Condition 1 – infrastructure and equipment requirements and <u>Condition 8 - operational requirements for infrastructure and equipment</u> Condition 10 – dewatering volume and water quality monitoring requirements	The Delegated Officer notes that the applicant intends to construct the pipeline within a trench to minimise the impact of leaks. The Delegated Officer has imposed requirements (Condition 7) to repair the pipeline in the event of any spills and leaks.
Leaks and overflows from the from water storage tank	Direct discharge of saline-hypersaline water	Pathway: direct discharge to land; seepage to ground and underlying groundwater; and/or run-off into ephemeral drainage lines Impact: localised erosion and/or adverse impacts to soils, surface water or groundwater quality	Land Underlying groundwater Fauna and flora within and near the Project Area.	Y	C = Moderate L = Possible Medium Risk	Y	Condition 1 – infrastructure and equipment requirements and <u>Condition 8 - operational requirements for infrastructure and equipment</u> Condition 10 – dewatering volume and water quality	Design/construction requirements for the water storage tank and associated infrastructure should mitigate the likelihood of events occurring. Tank overflows to report to an Overflow pipeline to be installed in an excavated trench or within a bunded area and graded longitudinally to the Legacy Earl Grey Pit.

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient ?	Conditions ² of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
		Impact: to native vegetation from pooling of discharged water or from waterlogging of soils with saline-hypersaline water					monitoring requirements	
Miscellaneous activities								
General mining activities	Hydrocarbon spills or leaks	Pathway: spills or leaks from pipeline Impact: adverse impacts to soils, native vegetation, surface water and/or groundwater quality	Land Underlying groundwater Fauna and flora within and near the Project Area.	N/A	C = Minor L = Possible Medium Risk	N/A	N/A	The premises has existing conditions portraying the recovery or disposal of hydrocarbons in an event of spills/leaks. Found in licence L9326/2022/1 (Condition 10). Unintended discharge of hydrocarbons and other harmful materials into the environment is also regulated under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .

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 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 29 April 2024	None received	N/A
Local Government Authority advised of proposal on 30 April 2024	None received	N/A
Draft Works Approval and Decision Report provided to the applicant for a 21-day comment period on 14 August 2024	Applicant provided comments on 16 August 2024 Refer to Appendix 1	Refer to Appendix 1

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. Covalent Lithium Pty Ltd 2024, *Earl Grey Lithium Project Works Approval Application Supplementary Information Document*, Perth, Western Australia
2. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020a, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020b, *Guideline: Environmental Siting*, Perth, Western Australia.
5. *Environmental Protection Authority (EPA) 2018, Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual*, Environmental Protection Authority, Perth, WA.

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

Condition	Summary of applicant’s comment	Department’s response
Condition 1, Table 1, Item 1	<p><u>Dewatering (Delivery) Pipeline</u></p> <ul style="list-style-type: none"> Requested removal of some design specifics of the pipeline along certain sections as they form the preliminary design and are subject to change. General requirements to be retained only. A lined sump is not required as the drainage is internal to the mining area and not adjacent native vegetation. Alternative wording proposed. 	The Delegated Officer agrees with the request to remove certain design specifics that have limited bearing on environmental risk, and supports the alternative wording suggested for related requirements to manage drainage in the event of a pipeline rupture or leak.
Condition 1, Table 1, Item 2	<p><u>In-Pit Sump Pump</u></p> <p>Proposing alternative installation requirements. The sump arrangement will change dependent on current mining, pit floor levels and activities. As the pit develops the arrangement will change to suit.</p>	The Delegated Officer is satisfied with the proposed changes and has updated condition requirements to reflect.
Condition 1, Table 1, Item 3	<p><u>Standpipe and Pump</u></p> <p>Covalent suggests that detail of the standpipe construction is detail not relevant to environmental risks and impacts. Recommend replacing the condition with a general drainage control requirement related to this equipment.</p>	The Delegated Officer is satisfied with the proposed changes and has updated condition requirements to reflect.
Condition 1, Table 1, Item 4 and 5	<p><u>Water storage tank (item 4) / water storage pond (item 5)</u></p> <ul style="list-style-type: none"> Decision has been made to use the water tank arrangement so the water storage pond option can be removed (item 5) from condition requirements. Detail of the tank specification is not relevant to environmental risks and impacts – request that only general requirements are retained. Requirement for tank to be constructed on reinforced concrete ring beam is not required. However, the floor/foundation will still be required to be compacted. 	<p>The Delegated Officer notes the decision to use the above ground water storage tank for the dewatering arrangements.</p> <p>The Delegated Officer is satisfied with the proposed changes and has updated condition requirements to reflect and has also updated related sections of the Decision Report.</p>
Condition 1, Table 1, Item 6	Covalent has decided that the overflow channel will be a pipe from tank overflow point, not an open channel. Suggests that similar conditions that were proposed for the other pipelines be applied to the overflow pipeline.	The Delegated Officer is satisfied with the proposed changes and has updated condition requirements to reflect.
-	Decision Report – changes to reflect comments above,	Noted and implemented.