



|                                    |   |
|------------------------------------|---|
| <b>Licence number</b>              | L9326/2022/1  |
| <b>Licence holder</b>              | Covalent Lithium Pty Ltd  |
| <b>ACN</b>                         | 70 623 090 139  |
| <b>Registered business address</b> | Level 17, 109 St Georges Terrace<br>PERTH WA 6000.  |
| <b>DWER file number</b>            | DER2022/000016~1  |
| <b>Duration</b>                    | 21/07/2022 to 20/07/2027  |
| <b>Date of issue</b>               | 21/07/2022  |
| <b>Premises details</b>            | Earl Grey Lithium Project<br>Marvel Loch – Forrestania Road<br>MOUNT HOLLAND WA 6426<br><br>Portion of Mining Tenement M77/1066<br><br>As defined by the premises map and coordinates in<br>Schedule 1 of the licence |

| <b>Prescribed premises category description<br/>(Schedule 1, <i>Environmental Protection Regulations 1987</i>)</b>   | <b>Assessed design capacity</b> |
|--|---------------------------------|
| <i>Category 54 – Sewage facility: premises —<br/>(a) on which sewage is treated (excluding septic tanks); or<br/>(b) from which treated sewage is discharged onto land or into<br/>waters.</i> | <i>180 cubic metres per day</i> |

This licence is granted to the licence holder, subject to the attached conditions, on 18 May 2023, by:

**Steve Checker**

**MANAGER WASTE INDUSTRIES**

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

*Environmental Protection Act 1986*

Licence number: L9326/2022/1 (Amendment date: 18/05/2023)

File number: DER2022/000016~1

## Licence history

| Date       | Reference number | Summary of changes   |
|------------|------------------|--|
| 12/02/2021 | W6460/2020/1     | Works approval for category 5: Processing or beneficiation of metallic or non-metallic ore (2,000,000 tonnes per annual period) issued for Earl Grey Lithium Project.  |
| 22/04/2021 | W6517/2021/1     | Works approval issued for construction and time-limited operation of a temporary 357-person (maximum capacity of 84 m <sup>3</sup> per day) sequence batch reactor WWTP and associated sprayfield, and a permanent 50-person (maximum capacity of 112 m <sup>3</sup> per day) stabilisation pond WWTP (premises approved for a maximum 154 m <sup>3</sup> per day) |
| 26/10/2021 | W6517/2021/1     | Amendment to works approval to change capacity from 154 m <sup>3</sup> /day to 150 m <sup>3</sup> /day; remove reference to Stage 2's Stabilisation Ponds; add an additional SBR WWTP to Stage 2 with associated sprayfield; make Stage 1's SBR WWTP's permanent and increase the associated sprayfield area from 2.4 ha to 2.66 ha.                               |
| 19/04/2022 | W6649/2022/1     | Works approval to undertake construction works relating to the development of a Class I landfill facility and a Class II landfill facility to support and form part of the larger Earl Grey Lithium Project.   |
| 21/07/2022 | L9326/2022/1     | Licence issued for SBR WWTP and associated irrigation sprayfields – approved production capacity of 120m <sup>3</sup> /day<br><br>Prescribed premises boundary expanded to capture entirety of the Earl Grey Lithium Project area.   |
| 28/11/2022 | W6673/2022/1     | Works approval to undertake works relating to the construction of the Integrated Waste landform (IWL) / Tailings Storage Facility (TSF) for the disposal of 1.2 Mtpa of wet tailings at the premises.  |
| 18/05/2023 | L9326/2022/1     | This licence amendment to include SBR WWTP Train 3 and increase throughput to 180m <sup>3</sup> /day.  |

## Interpretation

In this licence:

- (a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a condition, each row in a table constitutes a separate condition;
- (d) any reference to an Australian or other standard, guideline, or code of practice in this licence:
  - (i) if dated, refers to that particular version; and
  - (ii) if not dated, refers to the latest version and therefore may be subject to change over time;
- (e) unless specified otherwise, any reference to a section of a per day. n Act refers to that section of the EP Act; and
- (f) unless specified otherwise, all definitions are in accordance with the EP Act.

**NOTE:** This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

## Licence conditions

The licence holder must ensure that the following conditions are complied with:

### Infrastructure and equipment

- The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

**Table 1: Infrastructure and equipment requirements**

| Site infrastructure and equipment                                     | Operational requirement  | Infrastructure location |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
|---|--|-------------------------|-------|-------|--------------------------|------|-----|------------------------|------|-----|----------------|------|-----|------------------|------|----|----|----------|-----------|---------------|------|-----------|----------------|-----------|--------|---|
| Sequence batch reactor wastewater treatment plant (Trains 1, 2 and 3) | <ul style="list-style-type: none"> <li>Plant furnished with master control panel equipped with an audible and visual alarms</li> <li>Designed and constructed to treat a throughput of 180 m<sup>3</sup> per day to the following standard:</li> </ul> <table> <tr> <th>Parameter</th><th>Units</th><th>Limit</th></tr> <tr> <td>Biological oxygen demand</td><td>mg/l</td><td>&lt;20</td></tr> <tr> <td>Total suspended solids</td><td>mg/l</td><td>&lt;30</td></tr> <tr> <td>Total Nitrogen</td><td>mg/l</td><td>&lt;30</td></tr> <tr> <td>Total Phosphorus</td><td>mg/l</td><td>&lt;8</td></tr> <tr> <td>pH</td><td>pH scale</td><td>6.5 – 8.5</td></tr> <tr> <td>Free Chlorine</td><td>mg/l</td><td>0.2 – 2.0</td></tr> <tr> <td><i>E. coli</i></td><td>CFU/100ml</td><td>&lt;1,000</td></tr> </table> | Parameter               | Units | Limit | Biological oxygen demand | mg/l | <20 | Total suspended solids | mg/l | <30 | Total Nitrogen | mg/l | <30 | Total Phosphorus | mg/l | <8 | pH | pH scale | 6.5 – 8.5 | Free Chlorine | mg/l | 0.2 – 2.0 | <i>E. coli</i> | CFU/100ml | <1,000 | Labelled as 'SBR' in Schedule 1, Figure 2 |
| Parameter   | Units  | Limit                   |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| Biological oxygen demand  | mg/l   | <20                     |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| Total suspended solids  | mg/l   | <30                     |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| Total Nitrogen  | mg/l   | <30                     |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| Total Phosphorus  | mg/l   | <8                      |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| pH  | pH scale   | 6.5 – 8.5               |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| Free Chlorine   | mg/l   | 0.2 – 2.0               |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |
| <i>E. coli</i>  | CFU/100ml  | <1,000                  |       |       |                          |      |     |                        |      |     |                |      |     |                  |      |    |    |          |           |               |      |           |                |           |        |   |

| Site infrastructure and equipment       | Operational requirement   | Infrastructure location   |
|---|---|---|
| Irrigation sprayfields (Stages 1 and 2) | <ul style="list-style-type: none"> <li>• Combined 49,100 m<sup>2</sup> irrigation area</li> <li>• 5 m spray-drift buffer maintained between outermost spray-fields and perimeter fence</li> <li>• Operated to deliver treated wastewater at a maximum rate of 12 m<sup>3</sup> /hour</li> <li>• Designed to irrigate treated wastewater evenly over the irrigation area without ponding or pooling</li> <li>• Irrigation pipework fitted with branch-line flush valves</li> <li>• Valves, pumps, pipelines, and other fittings maintained and inspected daily for ruptures or leaks when irrigating</li> <li>• Maintained to prevent blockages, allow even and effective spray production, and ensure stopping and cutoff mechanisms are functioning as per equipment design</li> <li>• Fenced to exclude large fauna and unauthorised access to irrigation area</li> </ul> | Labelled as 'Sprayfield (Stage 1)' and 'WWTP Fence' in Schedule 1, Figure 2 |
| Perimeter drains                        | <ul style="list-style-type: none"> <li>• Earthen diversion drains maintained northeast and southeast of WWTP footprint to minimise stormwater runoff from sprayfields</li> </ul>  | Labelled as 'Drain' in Schedule 1, Figure 2                                 |

## Emissions and discharges

2. The licence holder must ensure that the emission(s) specified in Table 2, are discharged only from the corresponding discharge point(s) and only at the corresponding discharge point location(s).

**Table 2: Authorised discharge points**

| Emission         | Discharge Point        | Discharge point location      |
|------------------|------------------------|-------------------------------|
| Treated effluent | • Sprayfield (Stage 1) | Refer to Schedule 1, Figure 2 |
|                  | • Sprayfield (Stage 2) |                               |

3. The licence holder must ensure that the emissions from the discharge point listed in Table 3 do not exceed the corresponding limit(s) when monitored in accordance with condition 6.

**Table 3: Emission and discharge limits**

| Discharge point              | Parameter                | Units     | Limit     |
|------------------------------|--------------------------|-----------|-----------|
| Sprayfields (Stages 1 and 2) | Biological oxygen demand | mg/l      | <20       |
|                              | Total suspended solids   | mg/l      | <30       |
|                              | Total Nitrogen           | mg/l      | <30       |
|                              | Total Phosphorus         | mg/l      | <8        |
|                              | pH                       | pH scale  | 6.5 – 8.5 |
|                              | Free Chlorine            | mg/l      | 0.2 – 2.0 |
|                              | <i>E. coli</i>           | CFU/100ml | <1,000    |

4. The licence holder must investigate and manage any exceedances of the effluent limits in Table 3 as an incident.
5. The licence holder must maintain an alarm within the control system to alert operators if the levels of residual chlorine and pH in the treated effluent exceed the effluent limits in in Table 3.

## Monitoring

6. The licence holder must monitor effluent discharges during operations in accordance with Table 4.

**Table 4: Effluent water quality monitoring during operations**

| Parameter                | Frequency  | Averaging period | Units  | Method   |
|--------------------------|------------|------------------|--------|--|
| Volume                   | Continuous | Cumulative daily | kl/day | Mag-flow meter   |
| Biological oxygen demand | Monthly    | Spot sample      | mg/l   | Sampled in accordance with AS/NZS 5667.10<br>Analyzed by a |
| Total suspended solids   | Monthly    | Spot sample      | mg/l   |  |

| Parameter                  | Frequency         | Averaging period | Units     | Method   |
|----------------------------|-------------------|------------------|-----------|--|
| Total Nitrogen             | Monthly           | Spot sample      | mg/l      | laboratory with current National Association of Testing Authorities (NATA) accreditation for the parameters specified. |
| Total Phosphorus           | Monthly           | Spot sample      | mg/l      |  |
| pH                         | Continuous online | n/a              | pH scale  |  |
| Free Chlorine <sup>1</sup> | Continuous online | n/a              | mg/l      |  |
| <i>E. coli</i>             | Monthly           | Spot sample      | CFU/100ml |  |
| <i>Turbidity</i>           | Monthly           | Spot sample      | NTU       |  |

**Note 1: non-NATA accredited online analysis acceptable. Equipment must be calibrated in accordance with manufacturer specifications and records held.**

7. The licence holder must carry out daily visual inspections of the infrastructure in Table 1 and implementation of corrective actions where required.
8. The licence holder must ensure audits of the operations are carried out as follows:
  - (a) a full audit of the WWTP every three years; and
  - (b) an audit of the plumbing, maintenance, and alterations, including backflow and cross-connections, every five-years; and
  - (c) at any time should there be an indication of systemic issues (including from visual monitoring).

## Complaints management

9. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions from the premises:
  - (a) the name and contact details of the complainant, (if provided);
  - (b) the time and date of the complaint;
  - (c) the complete details of the complaint and any other concerns or other issues raised; and
  - (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.

## Records and reporting

10. The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:
  - (a) the calculation of fees payable in respect of this licence;
  - (b) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence;
  - (c) monitoring programmes undertaken in accordance with conditions 6, 7 and 8 of this licence; and
  - (d) complaints received under condition 9 of this licence.

- 11.** The books specified under condition 10 must:
- (a) be legible;
  - (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
  - (c) be retained by the licence holder for the duration of the licence; and
  - (d) be available to be produced to an inspector or the CEO as required.
- 12.** The licence holder must:
- (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
  - (b) prepare and submit to the CEO by no later than 21 September in each year after the end of that annual period an Annual Audit Compliance Report in the approved form.
- 13.** The licence holder must:
- (a) prepare a biennial environmental report that provides information in accordance with the requirements set out in Table 5 for the preceding two annual periods, and
  - (b) submit that environmental report to the CEO by no later than 21 September after the end of every second annual period (the first report being due on 21 September 2024, then biennially thereafter).

**Table 5: Environmental reporting requirements**

| Condition | Requirement   |
|-----------|---|
| 6         | <ul style="list-style-type: none"> <li>i. the volume (in kL) of treated wastewater applied daily to the irrigation field, and monthly cumulative volumes presented in table format;</li> <li>ii. treated wastewater monitoring data in tabulated and graphical form including the sampling dates and a comparison against the plant design specifications and emissions discharge limits in Table 3.</li> <li>iii. tabulated monthly and annual loadings of nitrogen, phosphorus and BOD applied to the irrigation field, including an explanation of the basis for determining loading rates;</li> <li>iv. an assessment and interpretation of the data, including comparison to historical trends and loading limits; and</li> <li>v. copies of laboratory sample analysis reports</li> </ul> |
| 1 and 7   | <ul style="list-style-type: none"> <li>i. a summary of inspections and maintenance performed to address operational requirements</li> </ul>   |
| 8         | <ul style="list-style-type: none"> <li>i. summary of any audits carried-out in the reporting period</li> </ul>  |
| 9         | <ul style="list-style-type: none"> <li>i. a summary of complaints received</li> </ul>   |



## Definitions

In this licence, the terms in Table 6 have the meanings defined.

**Table 6: Definitions**

| Term                                  | Definition  |
|---------------------------------------|---|
| ACN                                   | Australian Company Number   |
| Annual Audit Compliance Report (AACR) | means a report submitted in a format approved by the CEO (relevant guidelines and templates may be available on the Department's website).  |
| annual period                         | a 12-month period commencing from 1 July until 30 June of the immediately following year.   |
| books                                 | has the same meaning given to that term under the EP Act.   |
| CEO                                   | means Chief Executive Officer of the Department.<br>"submit to / notify the CEO" (or similar), means either:<br>Director General<br>Department administering the <i>Environmental Protection Act 1986</i><br>Locked Bag 10<br>Joondalup DC WA 6919<br>or:<br><a href="mailto:info@dwer.wa.gov.au">info@dwer.wa.gov.au</a> |
| Department                            | means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.  |
| discharge                             | has the same meaning given to that term under the EP Act.   |
| emission                              | has the same meaning given to that term under the EP Act.   |
| EP Act                                | <i>Environmental Protection Act 1986</i> (WA)   |
| EP Regulations                        | <i>Environmental Protection Regulations 1987</i> (WA)   |
| licence                               | refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.  |
| licence holder                        | refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.   |
| monthly period                        | means a one-month period commencing from the 15 <sup>th</sup> day of a month until the 14 <sup>th</sup> day of the immediately following month.   |

| Term                | Definition   |
|---------------------|--|
| premises            | refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map (Figure 1) in Schedule 1 to this licence. |
| prescribed premises | has the same meaning given to that term under the EP Act.  |
| waste               | has the same meaning given to that term under the EP Act.  |

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**END OF CONDITIONS**



Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown by the red line in Figure 1 below. The detailed layout of the infrastructure and equipment shown in Figure 2.

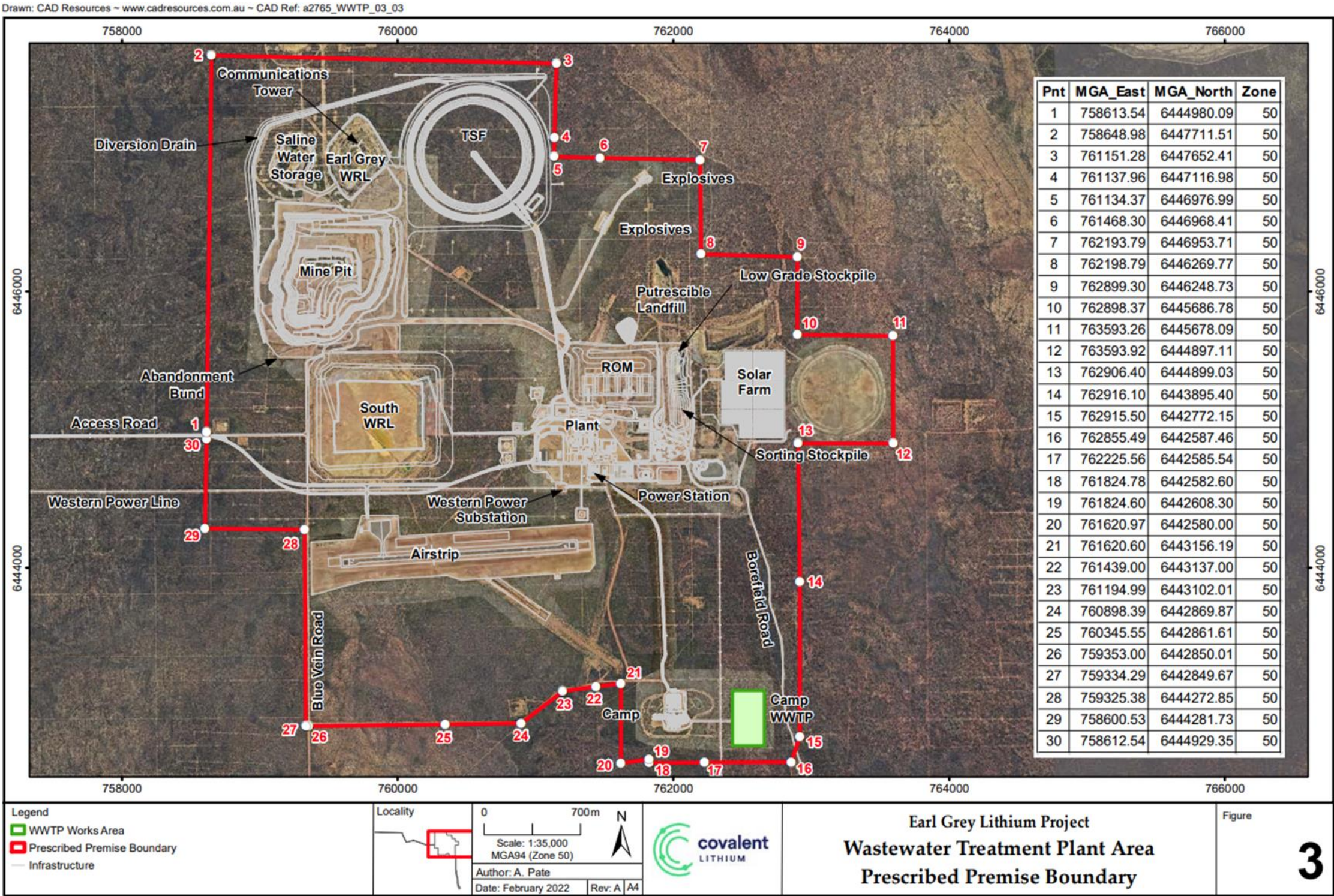


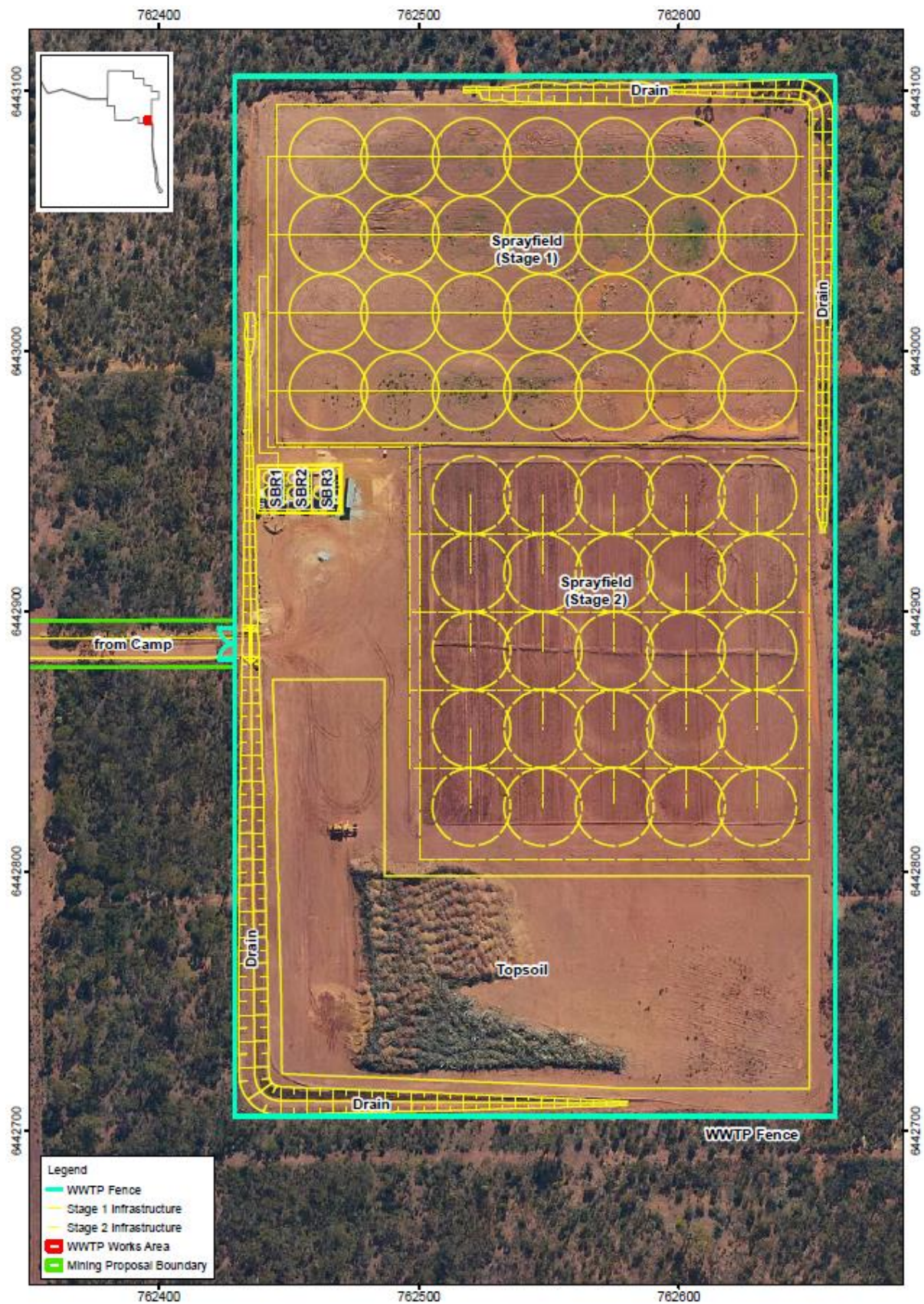
Figure 1: Map of the boundary of the prescribed premises

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**Figure 2: Layout of the Wastewater Treatment Plant**

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