



**Licence Number** L6363/1995/14

**Licence Holder** The Griffin Coal Mining Company Pty Limited

**ACN** 008 667 285

**File Number:** 2010/003138

**Premises** Griffin Coal – Ewington I & II Open Cut Mines  
Coalfields Highway  
COLLIE WA 6225

Legal description –

Coal Mining Lease CML 12/633, CML 12/634, CML 12/635, CML 12/636, CML 12/637, CML 12/638, CML 12/639, CML 12/640, CML 12/643, CML 12/644, CML 12/648, CML 12/680, CML 12/681, CML 12/682, CML 12/746, CML 12/748, CML 12/749, CML 12/751, CML 12/756 and part of CML 12/642, CML 12/645, CML, 12/651, CML 12/744, CML 12/745, CML 12/747, CML 12/750, CML 12/752, CML 12/753, CML 12/754, CML 12/844, CML 12/845, CML 12/846, M12/33, M12/34, M12/35 and M12/36.

**Date of Amendment** 11 August 2017

## Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

Date signed: 11 August 2017

**Tim Gentle**

**Manager Licensing – Resource Industries**

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

## Definitions and interpretation

### Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

**Table 1: Definitions**

Term	Definition
AER	Annual Environment Report
AHD	Australian Height Datum
AS 4156.6 – 2000	Australian Standard AS 4156.6 – 2000: Determination of Dust/moisture Relationship for Coal.
Category/Categories (Cat.)	categories of prescribed premises as set out in Schedule 1 of the EP Regulations
CAWS Act	<i>Country Areas Water Supply Act 1947</i>
Contributory activities	is defined in DWER's <i>Guidance Statement: Licensing and works approvals process</i> to mean activities which: <ul style="list-style-type: none"> <li>• are also activities within categories of prescribed premises under Schedule 1 of the EP Regulations; but</li> <li>• fall below any prescribed thresholds or limits in Schedule 1; and</li> <li>• contribute to the nature and type of emissions from the Primary Activity</li> </ul>
CML	Coal Mining Lease
CR	Compliance Report
CS Act	<i>Contaminated Sites Act 2003 (WA)</i>
DER	(former) Department of Environment Regulation
Delegated Officer	An officer under section 20 of the EP Act.
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
Licence Holder	The Griffin Coal Mining Company Pty Limited
m <sup>3</sup>	cubic metres
Minister	the Minister responsible for the EP Act and associated regulations
ML	Mining Lease

MS	Ministerial Statement
mtpa	million tonnes per annum
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	is defined in the EP Act to mean a person who is in occupation or control of a premises, or part of a premises, whether or not that person is the owner of the premises or part of the premises.
OEPA	(former) Office of the Environmental Protection Authority
Premises	Griffin Coal – Ewington I & II Open Cut Mines
Prescribed Premises	Premises prescribed under Schedule 1 to the EP Regulations
Primary Activities	is defined in DER's <i>Guidance Statement: Licensing and works approvals process</i> to mean activities which fall within the description of the category of prescribed premises in Schedule 1 to the EP Regulations.
Primary controls	are the controls that will be used in the first instance to address the key risks from the premises. DWER will give preference to the application of outcome-based conditions wherever possible in line with DWER's <i>Guidance Statement: Regulatory Principles</i> .
prescribed premises	premises prescribed under Schedule 1 to the EP Regulations.
RIWI Act	<i>Rights in Water and Irrigation Act 1914</i>
UDR	<i>Environmental Protection (Unauthorised Discharge) Regulations 2004 (WA)</i>
µg/m <sup>3</sup>	micrograms per cubic metre
µg/L	micrograms per litre

## Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited to an amendment to include category 63 and to remove any conditions that have been deemed redundant under DWER's *Operational Procedure IR-OP-02 Redundant Conditions*.

The following DWER guidance statements have informed the decision made on this amendment:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Decision Making (November 2016)*
- *Guidance Statement: Risk Assessment (November 2016)*
- *Guidance Statement: Environmental Siting (November 2016)*

## Amendment description

An application for amendment has been received from The Griffin Coal Mining Company Pty Limited to amend licence L6363/1995/14. The applicant has applied for the inclusion of category 63 to the licence to allow for the disposal of waste vehicle tyres.

## Other approvals

The Licence Holder has provided the following information relating to other approvals as outlined in Table 2.

**Table 2: Relevant approvals**

Legislation	Number	Approval
<i>Collie Coal (Griffin) Agreement Act 1979</i>	Entire	State Agreement Act
<i>Rights in Water and Irrigation Act 1914</i>	GWL 168071(2)	Taking water for the purpose of coal mining
<i>Country Areas Water Supply Act 1947</i>	LMW1034	Clearing of native vegetation/groundwater protection.
	LMW1036	
Part IV of the EP Act (WA)	Statement Number 380	Conditions and commitments implemented to enable coal mining
<i>Dangerous Goods Safety Act 2004</i>	DSG016475	Storage and handling of non-explosive dangerous goods
<i>Mining Act 1978</i>	Registration ID: 54043	Mineral exploration program of works
	Registration ID: 54978	
Part V of the EP Act (WA)	CPS5897/1	Clearing of native vegetation
	W1336/1995/1	Superseded works approvals and licences.
	W3505/1995/1	
	L6363/1995/5 to L6363/1995/8	
	L6363/1995/9	DWER initiated amendment to define legal entity and land description
	L6363/1995/10 to L6363/1995/11	Licence re-issue
	L6363/1995/12	Licensee initiated amendment to include flyash disposal
	L6363/1995/13	Licence re-issued containing proponent initiated amendment to increase throughput for category 9.
	L6363/1995/14	Licence amendment to include changes resulting from the Minister for Environment's determination of Appeals 153 - 155 of 2014.

## Amendment history

Table 3 provides the amendment history for L6363/1994/14.

**Table 3:** Licence amendments

Instrument	Issued	Amendment
L6363/1995/09	09/08/2005	DWER initiated amendment to define legal entity and legal land description.
L6363/1995/10	24/08/2006	Licence re-issue. New attachment of premises included.
L6363/1995/12	12/09/2008	Licence re-issue. Global changes made and nominal rated throughput increased.
L6363/1995/12	12/03/2009	Proponent initiated amendment to include Flyash Disposal.
L6363/1995/13	08/09/2011	Licence re-issue. Global changes and changes resulting from compliance inspections and pollution incident management response made.
L6363/1995/14	15/09/2014	Licence re-issue containing proponent initiated amendment to increase throughput to 5.4 million tonnes per annum. Licence converted to current format as part of renewal.
L6363/1995/14	15/10/2015	Licence amendment to include changes resulting from the Minister for Environment's determination of Appeals 153 -155 of 2014.
L6363/1995/14	28/04/2016	Global amendment: expiry date extended to 14/09/2026
L6363/1995/14	11/08/2017	Licence amended to include category 63 for the disposal of used tyres.

## Location and receptors

Table 4 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 4: Receptors and distance from activity boundary**

Residential and sensitive premises	Distance from Prescribed Premises
Residential Premises	Nearest sensitive premises is located 845 meters south west of the western noise bund.

Table 5 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 5: Environmental receptors and distance from activity boundary**

Environmental receptors	Distance from Prescribed Premises
Collie River East Branch	Collie River East Branch runs in a north-westerly direction to the east of the premises, as close as 1 km in some places.
Boronia Gully	Boronia Gully is a minor perennial watercourse that is situated on the northern boundary of the premises. It is subject to discharges from Ewington I & II in high rainfall events.
Groundwater	Groundwater beneath Ewington I & II is proclaimed groundwater under the RIWI Act. Groundwater is part of the Wellington Dam Catchment Area and classified 'Zone D' under the CAWS Act.

## Risk assessment

Tables 6 and 7 below describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

**Table 6: Risk assessment for proposed amendments during construction**

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	
Source/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts					
Cat 63: Class I inert landfill	Construction of new landfill cells	Dust: vehicle movement and excavation of landfill cells	Nearest sensitive premises is located 845 meters south west of the western noise bund.	Air / wind dispersion	Health and amenity impacts from dust and noise emissions	Slight	Unlikely	Low	Construction of the landfill cells will take under 1 week to complete and minimal impacts are expected and can be adequately managed through general provisions of the EP Act and Regulations and Griffin's <i>Environmental Management Plan</i> and <i>Noise Management Plan</i> .
		Noise: vehicle movement and excavation of landfill cells				Slight	Rare	Low	

**Table 7: Risk assessment for proposed amendments during operation**

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	
Source/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts					
Cat 63: Class I inert landfill	Disposal of inert waste (used tyres)	Dust: associated with vehicle movement	Nearest sensitive premises is located 845 meters south west of the western noise bund.	Air / wind dispersion	Health and amenity impacts from dust emissions	Slight	Unlikely	Low	Due to the small volume of waste being landfilled and the location being within a working coal mine area, the risk of dust emissions affecting potential receptors is considered low and can be adequately managed through general provisions of the EP Act and Regulations and Griffin's <i>Environmental Management Plan</i> .
		Smoke emissions: associated with burning tyres			Health and amenity impacts from emissions resulting from burning tyres	Moderate	Rare	Moderate	The Delegated Officer considers the risk from fire during operation of the landfill to be moderate. Given the small volume of waste and the location of the landfill surrounded by mining activities, this risk can be managed through provisions set out in "Part 6 – Tyres" of the <i>Environmental Protection Regulations 1987</i> and general provisions found in the EP Act and Regulations.
		Noise: vehicle movement, disposal and covering of cells			Health and amenity impacts from noise emissions	Slight	Rare	Low	Due to the small volume of waste being landfilled and the location being within a working coal mine area, the risk of noise emissions affecting potential receptors is considered low and adequately managed through Griffin's <i>Noise Management Plan</i> .

## Decision

The Delegated Officer has determined that the key emissions associated with the operation of the Class I Landfill (Category 63) are noise, dust and smoke emissions in the case of a fire at the landfill. The Licence has been amended to allow the operation of a 500 tonnes/annum of used vehicle tyres at the Class I landfill.

Licence Holder controls for the operation of the landfill is conditioned on the Licence to ensure that no more than 500 tonnes per annual period of used tyres are disposed of on site.

The Delegated Officer has also made changes to the Licence in accordance with administrative changes implemented as published in DWER's *IR-OP-02 Redundant Conditions* document.

## Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 18 July 2017. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

## Amendment

1. Definitions of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

'Anniversary Date' means 1 July in each year;

'annual period' means a 12 month period commencing from ~~the inclusive period from~~ 1 July until 30 June in the following year;

'CEO' for the purpose of correspondence means;

Chief Executive Officer

Department administering the *Environmental Protection Act 1986*

Locked Bag 33

CLOISTERS SQUARE WA 6850

Email: [info@der.wa.gov.au](mailto:info@der.wa.gov.au);

'Compliance Report' means a report in a format approved by the CEO as presented by the Licensee or as specified by the CEO from time to time and published on the Department's website;

'Department' means the department established under s.35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of the *Environmental Protection Act 1986*;

2. Condition 1.1.5 of the Licence is amended by the deletion of the text shown in strikethrough below:

~~Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:~~

~~(a) pollution;~~

~~(b) unreasonable emission;~~

~~(c) discharge of waste in circumstances likely to cause pollution; or~~

~~(d) being contrary to any written law.~~



3. Conditions 1.2.1 to 1.2.3 of the Licence are amended by the deletion of the text shown in strikethrough below:

~~The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.~~

~~The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.~~

~~The Licensee shall:~~

- ~~(a) — implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and~~  
~~(b) — treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.<sup>1</sup>~~

~~Note 1: The Environmental Protection (Unauthorised Discharges) Regulations 2004 make it an offence to discharge certain materials into the environment.~~

4. Table 1.3.1 of the Licence is amended by the insertion of the red text shown in underline below:

<b>Table 1.3.1: Throughput Limits</b>	
<b>Process</b>	<b>Production/<u>Disposal</u> limit (per annual period)</b>
Coal Mining	5 400 000 wet tonnes (ore)
Fly Ash disposal	364 000 tonnes
<u>Tyre disposal</u>	<u>500 tonnes</u>

5. Table 2.2.4 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

6.

<b>Table 2.2.4: Management Actions</b>			
<b>Emission point reference</b>	<b>Event/action reference</b>	<b>Event</b>	<b>Management action</b>
W2	EA1	1:100 year 72 hour ARI rainfall event recorded at Bureau of Meteorology Collie East Weather Station (ID 009994)	The Licensee shall take all practical measures to divert uncontaminated stormwater from entering the sedimentation basin
	EA2		The Licensee shall notify the CEO within 24 hours of becoming aware of the event
	EA3		The Licensee shall undertake the monitoring required by Table <del>3.6.1-3.2.1</del> <u>3.2.1</u> on a daily basis until point source emissions comply with the limits listed in Table 2.2.2

7. Conditions 2.3.1 and 2.3.2 of the Licence are amended by the deletion of the text shown in strikethrough below:

~~The Licensee shall use all reasonable and practical measures to prevent and where that is not practicable to minimise dust emissions from the Premises.~~

The Licensee shall ensure that no visible dust generated by the activities on the Premises crosses the boundary of the Premises.

8. Table 3.4.1 of the Licence is amended by addition of the text in red shown in underline below:

<b>Table 3.4.1: Monitoring of ambient air quality</b>						
<b>Monitoring point reference &amp; location</b>	<b>Parameter</b>	<b>Target</b>	<b>Units</b>	<b>Averaging period</b>	<b>Frequency</b>	<b>Method</b>
AAQ1 (Palmer Road Dust Monitor)	Particulates as PM <sub>10</sub>	50	µg/m <sup>3</sup>	24 hours	Continuous (Oct to May)	AS 3580.9.6 or AS 3580.9.8
	Particulates as TSP	90	µg/m <sup>3</sup>	24 hours	Continuous (Oct to May)	<u>AS 3580.9.6</u> or AS 3580.9.8

9. Condition 4.1.1 and Table 4.1.1 of the Licence are amended by the deletion of the text shown in strikethrough below:

The Licensee shall complete the improvements in Table 4.1.1 by the date of completion in Table 4.1.1.

<b>Table 4.1.1: Improvement program</b>		
<b>Improvement reference</b>	<b>Improvement</b>	<b>Date of completion</b>
IR1	<p><del>Undertake the following additional ambient environmental quality monitoring at the Palmer Road Dust Monitor (AAQ1):</del></p> <ul style="list-style-type: none"> <li><del>• Particulates as PM<sub>2.5</sub> using AS 3580.9.6 or AS 3580.9.8 methodology and averaging over a 24-hour period. The monitoring shall be for a continuous period between October to May and be presented in µg/m<sup>3</sup> units.</del></li> </ul>	31/05/2016

10. Conditions 5.1.2 and 5.1.3 of the Licence are amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

The Licensee shall ensure that:

- (a) ~~any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and~~
- (b) ~~any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.~~

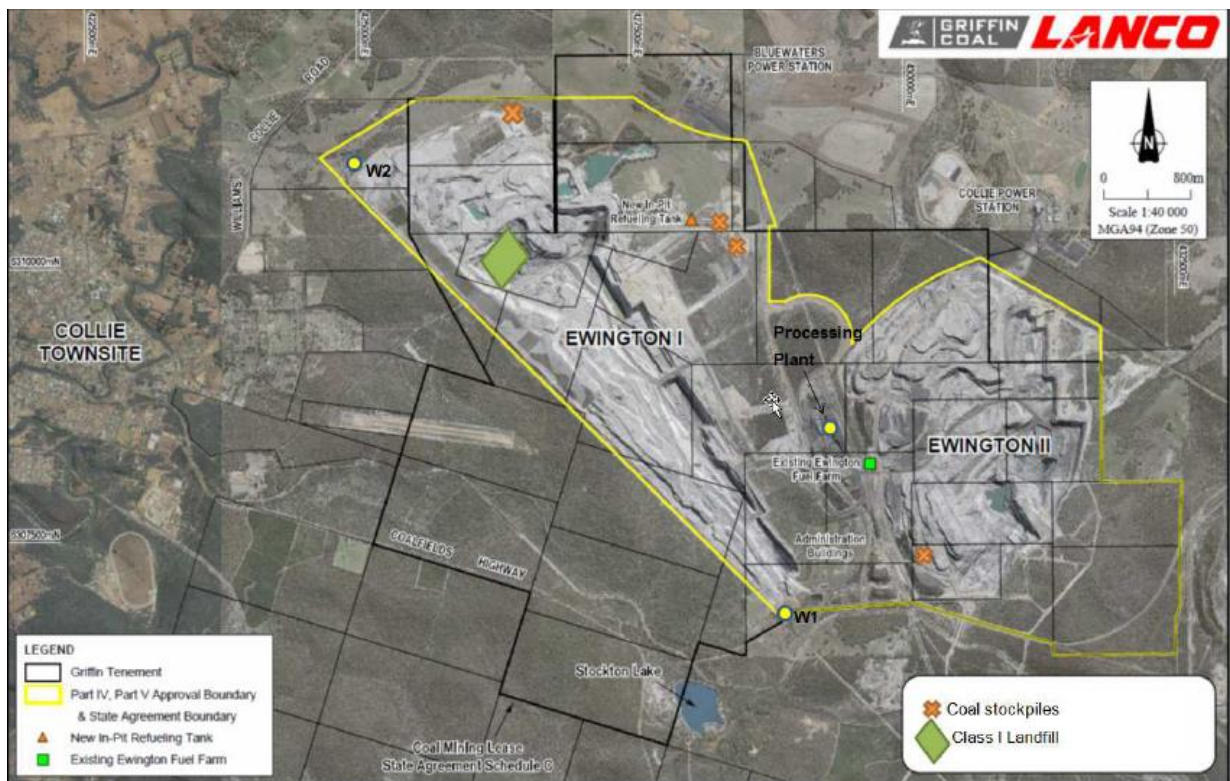
The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period. Must submit to the CEO within 92 days after the Anniversary Date, a Compliance Report indicating the extent to which the Licensee has complied with the Conditions in their Licence for the Annual Period.

11. Condition 5.2.1 and Table 5.2.1 of the Licence are amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

The Licensee shall submit to the CEO an Annual Environmental Report within ~~61~~92 calendar days after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.

<b>Table 5.2.1: Annual Environmental Report</b>		
<b>Condition or table (if relevant)</b>	<b>Parameter</b>	<b>Format or form<sup>1</sup></b>
-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken	None specified
Table 1.3.1	Production summary of the quantity of coal and overburden mined from each pit.	Table of production data
1.3.2	Total quantity of fly ash accepted for disposal, the quantity of fly ash disposed in each disposal location and the flyash to overburden disposal ratio for each disposal location.	Table/s
1.3.2	Results of ground and surface water monitoring undertaken in accordance with the Ash Management Plan.	None specified
<u>1.3.2</u>	<u>Total quantity of tyres disposed of.</u>	<u>None specified</u>
Tables 3.2.1 and 3.3.1	pH, total dissolved solids, total suspended solids, total alkalinity, dissolved oxygen (in-situ), total recoverable hydrocarbons, aluminium, arsenic , cadmium, chromium, copper, iron, lead, manganese, mercury, nickel and zinc monitoring results.	None specified
Table 3.2.1	Monthly discharge volume	Table and/or Graph
Table 3.4.1	Ambient Air Quality Monitoring Results for PM <sub>10</sub> and TSP	Table and/or Graph
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

12. Schedule 1: Maps, *Premises map* has been replaced with the map shown below:



13. Schedule 2: Reporting & notification forms, is amended by the deletion of the text shown in strikethrough below:

## ~~ANNUAL AUDIT COMPLIANCE REPORT PROFORMA~~

### ~~SECTION A LICENCE DETAILS~~

<del>Licence Number:</del>	<del>Licence File Number:</del>
<del>Company Name:-</del>	<del>ABN:</del>
<del>Trading as:</del>	
<del>Reporting period:</del>	
_____ to _____	

#### ~~1.1.1 STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS~~

- ~~1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)~~

\_\_\_\_\_ Yes  ~~Please proceed to Section C~~

\_\_\_\_\_ No  ~~Please proceed to Section B~~

~~Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).~~

Initial:

## **SECTION B**

### **DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.**

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
(i) b) Date(s) when the non-compliance occurred, if applicable:	
c) Was this non-compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non-compliance?:	
e) Summary of particulars of the non-compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non-compliance occurred (attach map or diagram):	
g) Cause of non-compliance:	
h) Action taken, or that will be taken to mitigate any adverse effects of the non-compliance:	
i) Action taken or that will be taken to prevent recurrence of the non-compliance:	

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:

## SECTION C

### SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

(ii) Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder; or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee; or if the licensee is a proprietary company that has a sole director who is also the sole company secretary — by that director; or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

**I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.**

SIGNATURE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

POSITION: \_\_\_\_\_

POSITION: \_\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

**SEAL (if signing under seal)**

## Appendix 1: Key documents

	Document title	In text ref	Availability
1	Licence L6363/1994/14 – Ewington I & II Coal Mines	L6363/1994/14	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
2	Licence amendment application	L6363/1994/14	DWER records (A1167056)
3	DWER, July 2015. <i>Guidance Statement: Regulatory principles.</i> Department of Environment Regulation, Perth.	DWER 2015a	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
4	DWER, October 2015. <i>Guidance Statement: Setting conditions.</i> Department of Environment Regulation, Perth.	DWER 2015b	
5	DWER, November 2016. <i>Guidance Statement: Risk Assessments.</i> Department of Environment Regulation, Perth.	DWER 2016b	
6	DWER, November 2016. <i>Guidance Statement: Decision Making.</i> Department of Environment Regulation, Perth.	DWER 2016c	
7	DWER, May 2016. <i>IR-OP-02 Redundant Conditions.</i> Department of Environment Regulation, Perth.	N/A	



## Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 18 July 2017 for review and comment. The Licence Holder responded on 19 July 2017.

Condition	Summary of Licence Holder comment	DWER response
Table 2.2.4	The Management action refers to Table 3.6.1. The table of reference is actually 3.2.1	Changes made
Table 3.4.1	Australian Standard inserted was AS3580.9.8, should be AS3580.9.6	Changes made
3.3.1	Removal of condition 3.3.1 from the licence	This amendment notice is primarily to include category 63 and to remove any conditions that have been deemed redundant under DWER's <i>Operational Procedure IR-OP-02 Redundant Conditions</i> . A review of the licence will be undertaken in the future and these points will be considered and a risk assessment undertaken.
Table 2.2.3	Review of the TDS target limit from 500 mg/L to that of 1000mg/L in table 2.2.3	