

Statement of Reasons

TELLUS – INTERMODAL TRANSIT STATION

PROPOSAL

Tellus Holdings Limited (the Proponent), submitted a Notice of Intent (NOI) for the Intermodal Transit Station at Brewer Industrial Estate (the Proposal) to the Northern Territory Environment Protection Authority (NT EPA) on 18 June 2019 for consideration under the Environmental Assessment Act 1982 (EA Act).

The Proposal is to facilitate the transfer of salt from the Proponent’s Chandler Facility (a salt mine and waste storage facility) and the temporary storage and transfer of waste to the Chandler Facility for storage or permanent disposal. The Chandler Facility was assessed at the level of an Environmental Impact Statement (EIS) under the EA Act and recommendations for conditions of approval were made by the NT EPA in November 2017 (Assessment Report 83).

The Proponent plans to construct and operate the Proposal on NT Portion 7772(A) at the Brewer Industrial Estate approximately 25km south-west of Alice Springs and 110km north of the Chandler Facility. The site is zoned Specific Uses – Brewer Estate (or SBE) under the NT Planning Scheme and is bound by Brewer Road and the Owen Springs Power Station to the west, the Central Australian Railway to the east and vacant land to the north and south. The total area of land being considered covers 44 hectares (ha) of which 18.4ha would be cleared of native vegetation.

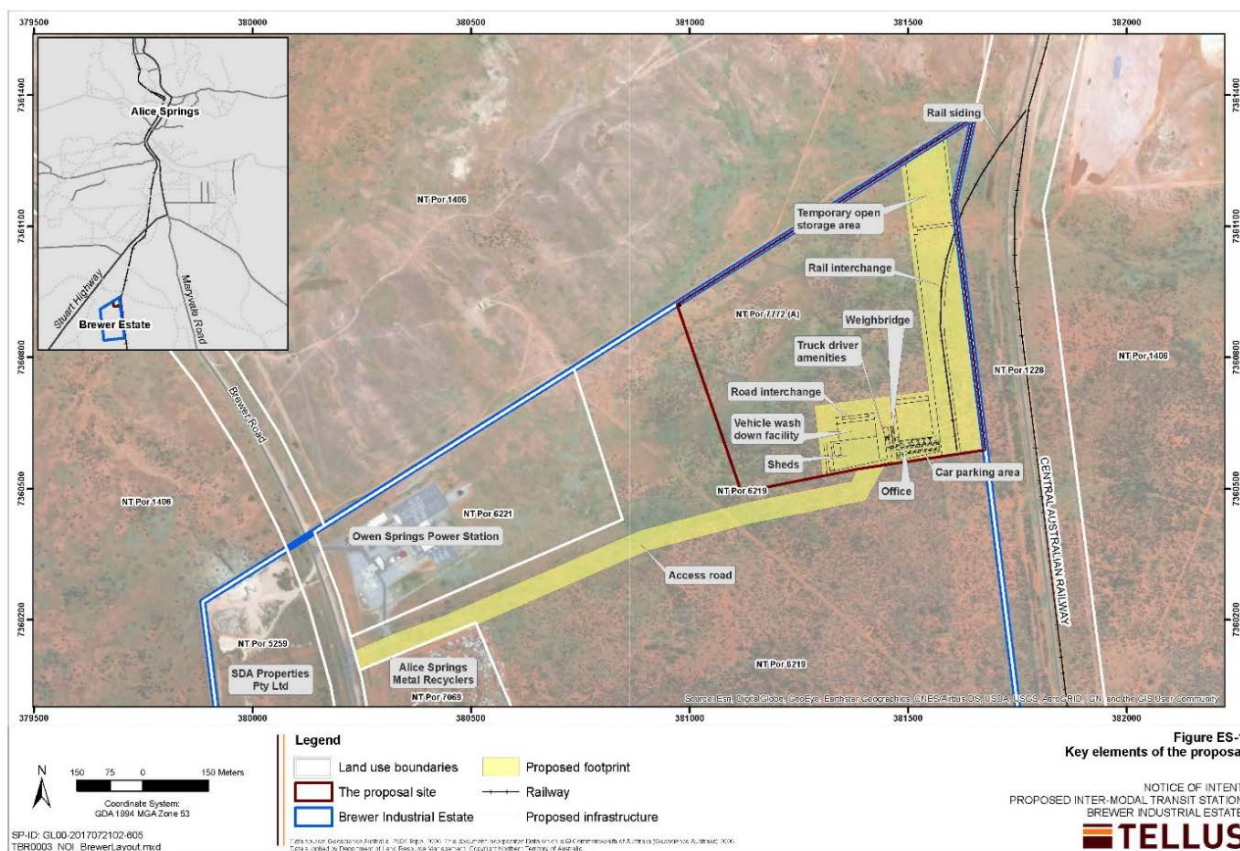


Figure 1 - Proposed site location and layout (Source: NOI)

The key components of the Proposal are shown in Figure 1 and include:

- a 1.7ha open temporary storage area with capacity to store up to 70,000 tonnes of waste per annum for a maximum five day period prior to transfer to the Chandler Facility
- road and rail interchange areas for transfer of salt
- an upgrade and 1.15km extension of an existing access road
- an office, amenities and maintenance and storage sheds
- internal roads, car parking, a weighbridge and vehicle wash down facility
- installation of services, stormwater drainage, security fencing, cameras and lighting.

The facility would receive waste in sealed and labelled storage containers including flexible and rigid intermediate storage containers, drums, wrapped pallets and shipping containers. The Proponent would receive notification of the type and volume of waste prior to delivery. On arrival, waste would be unloaded with a forklift at the interchange area and moved to the open storage area. Waste received would be inspected and accompanying waste transfer records reviewed to confirm compliance with the waste acceptance criteria (WAC). Any non-compliant waste would remain in the open storage area and be returned to the point of origin via rail. Accepted waste would be loaded onto trucks for transport to the Chandler Facility for permanent isolation and disposal. Salt would arrive at the Proposal site in bulk via trucks from the Chandler Facility and would be loaded directly onto trains for transport to domestic or international market.

The Proponent would be required to obtain an Environment Protection Approval (EPA) for the construction phase of the Proposal and an Environment Protection Licence (EPL) for the operations phase under the Waste Management and Pollution Control Act 1998. The Proposal will also require relevant planning approvals. The EPA and EPL would be administered by the NT EPA and would authorise the Proponent to accept a range of waste streams that conform to specific WAC suitable for permanent disposal in the deep geological repository at the Chandler Facility.

CONSULTATION

The NOI has been reviewed as a notification under the EA Act in consultation with Northern Territory Government (NTG) advisory bodies (see Attachment A) and the responsible Minister, in accordance with clause 8(1) of the Environmental Assessment Administrative Procedures (EAAP).

JUSTIFICATION

The NOI was assessed against the NT EPA’s environmental factors and objectives. The NT EPA identified five environmental factors (Table 1) that could potentially be significantly impacted by the Proposal. The NT EPA considered the importance of other environmental factors during the course of its assessment; however, the potential impact of the Proposal on those factors was not identified as significant.

Table 1. Key NT EPA environmental factors

Theme	Key Environmental Factor	Objective
Land	1. Terrestrial flora and fauna	Protect the NT’s flora and fauna so that biological diversity and ecological integrity are maintained.
	2. Terrestrial environmental quality	Maintain the quality of land and soils so that environmental values are protected.

Theme	Key Environmental Factor	Objective
Water	3. Inland water environmental quality	Maintain the quality of groundwater and surface water so that environmental values including ecological health, land uses, and the welfare and amenity of people are protected.
People and Communities	4. Social, economic and cultural surroundings	Protect the rich social, economic, cultural and heritage values of the Northern Territory.
	5. Human health	Ensure that the risks to human health are identified, understood and adequately avoided and/or mitigated.

1. Terrestrial flora and fauna

Objective: Protect the NT's flora and fauna so that biological diversity and ecological integrity are maintained.

The vegetation on site largely consists of grassland characterised by buffel grass (*Cenchrus ciliaris*), tall open shrubland characterised by *Hakea leucoptera* and witchetty bush (*Acacia kempeana*), and open woodland characterised by ironwood (*Acacia estrophiolata*), mulga (*Acacia aneura*), *Eremophila spp.* and sticky hop bush (*Dodonaea viscosa*). The site appears to have been partially cleared in the past and used for grazing, and would be cleared of native vegetation as part of the Proposal to allow for construction and operation of the facility.

A search of the Department of Environment and Natural Resources (DENR) flora and fauna databases indicates that the general region has been moderately-well surveyed for wildlife. No plants or animals listed as threatened under the Territory Parks and Wildlife Conservation Act 1976 (TPWC Act) or the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) are presently known from within the Brewer Estate. Five threatened fauna species have been recorded from within 10km of the site, including:

- grey falcon *Falco hypoleucos* (Vulnerable, TPWC Act)
- bar-tailed godwit *Limosa lapponica* (Vulnerable, TPWC Act)
- curlew sandpiper *Calidris ferruginea* (Vulnerable, TPWC Act; Critically Endangered EPBC Act)
- princess parrot *Polytelis alexandrae* (Vulnerable, TPWC and EPBC Acts)
- black-footed rock-wallaby *Petrogale lateralis* (Vulnerable EPBC Act).

Habitat within the Proposal area is unlikely to be suitable and/or is of insufficient extent to support any of the five threatened fauna species. None of the species are therefore likely to be impacted by the Proposal. The NT EPA notes the proximity of an important bat roosting and maternity site ('the bat caves'), located 2km north of the Proposal area, however, these caves do not contain any species of conservation significance and no impacts from the Proposal are anticipated.

There are no sensitive vegetation communities or threatened ecological communities within the Proposal area. The site is less than 10km from the nearest site of conservation significance and the nearest Conservation Reserves (Kuyunba Conservation Reserve and Ewaninga Rock Carvings Conservation Reserve) and the Proposal is not anticipated to have any impact on these sites.

No declared noxious or environmental weed species were present at the time of survey. There is potential for construction works to result in the introduction and spread of declared weeds through vehicle movements and vegetation clearing that could affect surrounding areas. To

mitigate this risk, the Proponent has committed to implementing weed and invasive species management measures in consultation with the DENR Weed Management Branch.

The NT EPA is satisfied that the potential impacts and risks to terrestrial flora and fauna can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objective for terrestrial flora and fauna is likely to be met.

2. Terrestrial environmental quality

Objective: Maintain the quality of land and soils so that environmental values are protected.

The Proposal site is located within the Amadeus Basin with quaternary sediments and deep neutral red-brown kandosol soils. The Proposal area has a low erosion risk due to the low frequency and volume of rainfall and the flat to undulating topography. There are no registered contaminated sites in the vicinity of the Proposal and field investigations indicated no signs of soil contamination.

The Proposal has the potential to impact terrestrial environmental quality through soil disturbance and erosion from vegetation clearing, and through the storage of large volumes of hazardous waste and salt above ground that could leak or spill resulting in localised soil contamination or increased soil salinity. The Proponent has committed to developing and implementing erosion and sediment control measures consistent with best practice guidelines for the duration of the Proposal. The site would be designed and constructed to prevent the release or discharge of any stormwater from the site. The Proponent has committed to incorporate these requirements into the detailed technical engineering design and management plans.

All waste stored at the Proposal site would be encased in sealed containers and fuels would be stored securely in bunded areas to minimise the risk of contaminants entering the environment. The Proponent has committed to managing hazardous materials onsite in accordance with relevant legislation, standards and codes including the Work Health and Safety Act (WHS Act) and Australian Standard 1940:2004 (The Storage and Handling of Flammable and Combustible Liquids), which would reduce the risk of spills and contamination to an acceptable level.

The NT EPA's assessment of the Chandler Facility (Assessment Report 83) made a number of recommendations to ensure the potential impacts and risks associated with the storage of hazardous wastes are adequately mitigated. Relevant recommendations of Assessment Report 83 will be considered in conditioning the EPA and EPL for the Proposal, including recommendations relating to the WAC, waste storage and handling procedures, financial security and requirements for independent expert peer review.

The NT EPA is satisfied that the potential impacts and risks to terrestrial environmental quality can be mitigated through implementation of the management measures presented in the NOI and applicable approvals. The NT EPA considers that its objective for terrestrial environmental quality is likely to be met.

3. Inland water environmental quality

Objective: Maintain the quality of groundwater and surface water so that environmental values including ecological health, land uses, and the welfare and amenity of people are protected.

The Proposal is located in a catchment of ephemeral creeks that drain from the upper slopes of the range to the north and west of the Brewer Industrial Estate, east into a subsidiary of Roe Creek which then joins the Todd River approximately 20km downstream. The northern and western portions of the Proposal area are prone to inundation for days to weeks following high rainfall events. There are no natural waterbodies or drainage lines in or near the Proposal area although there is a man-made, open, unlined drain along the northern boundary of the site that

acts as a retention / evaporation basin that does not discharge. Natural minor streams occur to the north and south of the proposed site. The Proposal area is outside the aquifer protection zone for potable water.

The soil types, elevation and vegetation species present indicate most of the site (>70%) is prone to ephemeral inundation following rain events. Review of available mapping indicates the site may be inundated for periods of days to weeks following a high rainfall event (>25mm) however these events are relatively rare, occurring on average 1.8 days per year. The Proponent would overcome this constraint by ensuring appropriate design and construction techniques to manage stormwater. The Proponent committed to design and construct the stormwater drainage system to contain all site stormwater runoff and prevent the discharge of any stormwater from the site.

Inland water environmental quality would potentially be impacted by the proposal if there was a major spill of a hazardous liquid waste during a rain event and contaminants were mobilised off site into the surface water network. However, with the proposed mitigation measures in place, including; bunding and containment of liquid wastes; diversion of clean water around the site; installation of stormwater drainage; containment of stormwater runoff onsite; and regular monitoring and inspection, significant impacts to waterways are considered unlikely.

The proposed site is located approximately 7km south of the Alice Springs water supply bore field and outside the aquifer protection zone for potable water. The groundwater table is approximately 99m below ground level beneath the site and is considered geologically isolated from the Alice Springs water supply aquifer. There are no shallow aquifers, waterlogged soils, or surface waterbodies in or near the Proposal area and no activities are proposed that would result in a hydrogeological connection with the groundwater table. With implementation of the proposed management measures, the risk of impacting the quality of any surface water, groundwater or drinking water sources as a result of construction or operation of the Proposal is considered to be low.

The NT EPA is satisfied that the potential impacts and risks to inland water environmental quality are not significant with the implementation of the mitigation and management measures presented in the NOI. The NT EPA considers that its objective for inland water environmental quality is likely to be met.

4. Social, economic and cultural surroundings

Objective: Protect the rich social, economic, cultural and heritage values of the Northern Territory.

Cultural considerations

There are no known records of heritage items within the site as confirmed by online database searches and consultation with the Heritage Branch of the NT Department of Tourism, Sport and Culture. There are no nominated, provisional or declared heritage places located within or in the vicinity of the site nor any previously recorded archaeological sites and no archaeological surveys were not recommended by the Heritage Branch.

Consultation with the Aboriginal Areas Protection Authority (AAPA) identified a previously recorded sacred site/restricted work area to the west of the Proposal area, adjacent to the proposed site access road and the Owen Springs Power Station. The Proponent committed to obtaining an Authority Certificate under the Northern Territory Aboriginal Sacred Sites Act 1989 and adhering to any conditions on which the proposed work may be carried out.

Social and economic considerations

The site of the proposal is located on land within Brewer Industrial Estate, which was set aside by the NT Government specifically for industrial purposes that require isolation from other urban land uses. There are no residential or commercial areas located in close proximity to the Proposal area, with the nearest being the Alice Springs Correctional Centre 3.5km away. This is consistent with the NT EPA Guideline for Recommended Land Use Separation Distances.

Construction and operation of the Proposal is not expected to impact on the amenity of existing land uses through visual, dust, or noise and traffic impacts. Construction would be undertaken by about 25 full-time equivalent staff over a six month period and operation of the Proposal would require about 12 full-time equivalent staff. Construction and operations activities would only occur between 7am and 5pm Monday to Friday, with no works proposed on weekends or public holidays. Employees would be locally sourced from Alice Springs or other communities on a drive in drive out basis.

Access to the site would be via a site access road from Brewer Road incorporating a one way traffic system with separate entry and exit points. The Proponent estimated one way truck movements to be approximately eight per day for a steady state capacity and up to fifty per day for a peak storage capacity event. Train movements are likely to be one per day. The Proponent committed to undertaking detailed traffic and rail studies which would assess the impact of the Proposal on the transport network in the surrounding area. Traffic management measures will be incorporated into the relevant plans and procedures for the Proposal.

The Proposal would potentially have beneficial social and economic impacts through creation of local jobs, aboriginal employment opportunities, support to local businesses, regional investment and development and capital and operational expenditure which would boost the local and regional economy.

The Proponent has committed to ongoing consultation with stakeholders throughout the duration of the Proposal and implementation of mitigation measures to safeguard the community and the environment from potential adverse impacts.

The NT EPA is satisfied that adverse social and cultural impacts are not likely to be significant with the implementation of the management measures presented in the NOI. The NT EPA considers that the Proposal may provide benefits to the local economy and that its objective for social, economic and cultural surroundings is likely to be met.

5. Human health

Objective: Ensure that the risks to human health are identified, understood and adequately avoided and/or mitigated.

The Proposal would accept hazardous and intractable wastes and would store hazardous materials that could potentially impact on human health if not handled and stored appropriately. The Proponent would avoid impacts on human health through the implementation of management measures to prevent the accidental release of waste from storage containers and areas. Proposed measures include use of secondary containment, bunding, fit for purpose sealed storage containers, personal protective equipment and emergency response planning.

The storage and handling of wastes containing naturally occurring radioactive material (NORM) has potential to lead to exposures to both workers and members of the public. Wastes containing NORM would be accepted at the proposed transit station where radionuclide concentrations are below radioactive waste levels and exempt from radiation related regulation in accordance with the WAC, the National Directory for Radiation Protection and the Radiation Protection Act 2004. The acceptance of low level, intermediate level and high level radioactive waste is not proposed for the facility. The Proponent has committed to implementing

appropriate control measures to ensure exposure to ionising radiation to workers and members of the public are below specified exposure limits. Any future proposal to accept and store radioactive waste would be subject to further environmental assessment under clause 14A of the EAAP.

The NT EPA is satisfied that the potential impacts and risks to human health can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objective for human health is likely to be met.

Conclusion

The NT EPA considers that the potential environmental impacts and risks associated with the Proposal are not significant and that the Proposal does not require assessment under the EA Act.

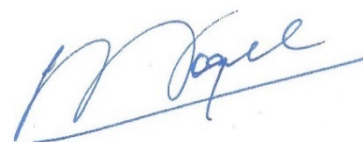
Comments from NTG advisory bodies have been provided to the Proponent for consideration to ensure that potential impacts on the environment are minimised and responsibilities under the legislation can be met.

DECISION

The proposed action, which was referred to the NT EPA by Tellus Holdings Limited, has been examined by the NT EPA and preliminary investigations and inquiries conducted. The NT EPA has decided that the potential environmental impacts and risks of the proposed action are not so significant as to warrant environmental impact assessment by the NT EPA under provisions of the EA Act. However, the proposed action will require assessment and approvals under the Waste Management and Pollution Control Act 1998 and the Planning Act 1999 to ensure the environmental issues associated with the proposed action are effectively managed.

Management of the potential environmental impacts is the responsibility of Tellus Holdings through preparation and implementation of procedures and management plans specified in the NOI.

This decision is made in accordance with clause 8(2) of the Environmental Assessment Administrative Procedures, and subject to clause 14A the administrative procedures are at an end with respect to the proposed action.



DR PAUL VOGEL AM MAICD
CHAIRMAN

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

15 AUGUST 2019

Attachment A: Northern Territory Government Advisory bodies consulted on the Notice of Intent

Department	Division
Department of Environment and Natural Resources	Flora and Fauna Water Resources Weeds Environment Bushfires NT Rangelands
Department of Infrastructure, Planning and Logistics	Planning Transport and Civil Services Infrastructure
Department of Primary Industry and Resources	Mining Compliance Petroleum Primary Industry Fisheries
Department of Tourism, Sport and Culture	Parks and Wildlife Heritage Tourism NT Arts and Museums
NT Police, Fire and Emergency Services	Business Improvement and Planning
Department of Health	Environmental Health Medical Entomology
Department of Trade, Business and Innovation	Economics and Policy Strategic Policy and Research
Department of Local Government, Housing and Community Development	Maintenance Planning Housing supply
Power and Water Corporation	
Aboriginal Areas Protection Authority	Technical
Department of the Attorney-General and Justice	Commercial Division NT Worksafe
Department of the Chief Minister	Economic and Environmental Policy Social Policy