



<b>Licence Number</b>	L5109/1990/13
<b>Licence Holder</b>	Coogee Chemicals Pty Ltd
<b>ACN</b>	008 747 500
<b>Registered business address</b>	4 Kwinana Beach Road KWINANA BEACH WA 6167
<b>Date of amendment</b>	13 October 2016
<b>Prescribed Premises</b>	Category 31 – Chemical manufacturing Category 33 – Chemical blending or mixing Category 73 – Bulk storage of chemicals, etc.
<b>Premises</b>	Coogee Chemicals 4 Kwinana Beach Road, KWINANA BEACH WA 6167

## Amendment

The Chief Executive Officer (CEO) of the Department of Environment Regulation (DER) has amended the above licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice.

Date signed: 13 October 2016

Christine West  
Manager Licensing (Process Industries)

LICENSING AND APPROVALS

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

## Amendment Notice

This notice is issued under 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.

## Amendment Description

Coogee Chemicals Pty Ltd (Coogee Chemicals) applied on 15 August 2016 for a licence amendment to allow for the construction of a sodium hypochlorite Filling Station on their prescribed premises in Kwinana Beach. The Filling Station will be used to transfer sodium hypochlorite from road tankers into Intermediate Bulk Containers (IBCs) for immediate despatch to customers.

The proposed Filling Station will be installed in an existing shed which was previously used to store methanol drums. The shed has concrete hardstand and bunding installed. New infrastructure will consist of a pump, pipe and fittings, valves, flow meter, batch metering system, and hose connections to the road tanker and the IBC.

## Process Description

Sodium hypochlorite will arrive on the premises by road tanker from the Kwinana Chlor-Alkali Plant. One delivery of 5,000L per week is anticipated. The road tanker will be connected to the Filling Station via 2-inch flexible hose; a 1-inch hose will be connected from the outlet of the Filling Station to the IBC. The Filling Station is automatically controlled by a flow meter and batch metering system. Sodium hypochlorite solution will be pumped into the IBC, with filling automatically ceasing once 1000L has been dispensed, after approximately 12 minutes. During this process, the air inside the IBC is vented to atmosphere via a hose connected from the IBC to the outside of the shed via a stack, which is 3m above the roof height. Once the IBCs are filled, they will be sealed and transported off-site to the customer.

A site map, site plan and schematic diagram of the Filling Station are provided in Appendices 1 to 3.

## Location, environmental siting and potential receptors

The Filling Station will be located within the existing Coogee Chemicals facility, which is located within the Kwinana Industrial Area. Surrounding Coogee Chemicals are other heavy industrial premises including Australian Gold Reagents, CSBP Limited and Kwinana Nickel Refinery. Approximately 2.6km from the premises is the residential area of Calista and about 3km to the south is the residential area of North Rockingham. Cockburn Sound is approximately 1.5km to the west of the premises. Table 1 below lists the relevant receptors in the vicinity of the Filling Station.

**Table 1: Receptors and distance from prescribed activity**

<b>Residential and Sensitive Premises</b>	<b>Distance from Prescribed Activity</b>
Calista	2.6km
North Rockingham	3km
<b>Environmental receptors</b>	<b>Distance from Prescribed Activity</b>
Cockburn Sound	1.5km

## Risk assessment

Table 2 below applies a basic risk assessment to the potential emissions which may arise from the amendment application. Both tables identify whether these emissions present a material risk requiring regulatory controls.

**Table 2: Risk assessment for proposed amendment during operation**

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Material risk	Reasoning
Source	<p><b>Category 31 –</b> Chemical manufacturing</p> <p><b>Category 33 –</b> Chemical blending or mixing</p> <p><b>Category 73 –</b> Bulk storage of chemicals, etc.</p>	Operation of the sodium hypochlorite filling station	<p><b>Odour:</b> generated by vapours released from the roof vent during filling</p>	Neighboring industrial premises	Air	Amenity and health	No	<p>Normal operation of the Filling Station generates air emissions from the venting hose, used to displace air from the IBC during the filling process. These emissions are most likely to be air, with low levels of sodium hypochlorite also being present. The Licence Holder expects one 5,000L delivery per week to be received at the Filling Station. Given that each 1,000L IBC container takes approximately 12 minutes to fill, it is calculated that approximately 60 minutes of venting will take place per week.</p> <p>Based on these calculations, the location of the premises in an industrial area, and the discharge via a stack 3m above the roof, the Delegated Officer has determined that the consequence is <b>insignificant</b> and that the likelihood will be <b>rare</b>. The Delegated Officer, therefore, considers the overall risk of odour emissions to be <b>low</b>.</p>
			<p><b>Noise:</b> generated by pump equipment</p>	Neighboring industrial premises	Air	Amenity	No	<p>Noise emissions may be generated by the pump used in the Filling Station. The Licence Holder proposes to use a small pump of 0.37 kW rating.</p> <p>Based on the specifications of the pump, operation duration and frequency, and location of the premises in an industrial area, the Delegated Officer has determined that the consequence is <b>insignificant</b> and that the likelihood will be <b>rare</b>. The Delegated Officer, therefore, considers the overall risk of noise emissions to be <b>low</b>.</p>
			<p><b>Waste:</b> associated with spills or leaks of sodium hypochlorite leading to discharge outside of containment areas</p>	Groundwater located at approximately 4m depth; Cockburn Sound approximately 1.5km.	Air	Reduction in groundwater quality	No	<p>In order to minimise the occurrence of overflow and/or spillage of sodium hypochlorite, the Licence Holder has in place a flow meter and batch metering system which automatically stops after 1,000L has been dispensed. The system is fully compliant with AS3780: The storage and handling of corrosive substances. In the event of spillage or overflow, sodium hypochlorite will be contained within the existing bunded concrete compound. The existing sump of 5.35m<sup>3</sup> capacity will adequately contain the contents of five IBCs, considered to be a single delivery. Any spillages will be collected and disposed of in the existing waste liquid ponds.</p> <p>The Delegated Officer has determined that the consequence is insignificant and that the likelihood will be rare. The Delegated Officer, therefore, considers the overall risk of odour emissions to be low.</p>

## Decision

Having considered the proposed amendment to the licence, the Delegated Officer has determined that the operation of the Filling Station will not result in emissions which are unacceptable to public health or the environment.

The operation of the Filling Station will be subject to infrastructure controls specified by the Licence Holder.

## Amendment History

Instrument	Issued	Amendment
L5109/1990/13	04/12/2014	Licence issued
L5109/1990/13	13/10/2016	Amendment Notice #1 Inclusion of the Sodium Hypochlorite Filling Station

## Licensee's Comments

The Licensee was provided with the draft Amendment Notice on 10 October 2016. Licensee responded on 12 October 2016, stating no comments and including a waiver form for the 21 day consultation period, enabling the amendment to be issued.

## Amendment

- The licence is amended by the insertion of Section 6: “Works” and the inclusion of the following conditions 6.1 to 6.4:

### 6 Works

- The Licensee must construct the infrastructure listed in Column 1 in accordance with the requirements set out in Column 2 of Table 6.1.*

<b>Table 6.1 Infrastructure Requirements Table</b>	
<b>Column 1</b>	<b>Column 2</b>
<b>Site Infrastructure</b>	<b>Specified Requirements</b>
<i>Filling Station <sup>(Note 1)</sup></i>	<ul style="list-style-type: none"> <li>• Covered compound with bunded concrete floor; and</li> <li>• Concrete sump with a capacity of 5.35m<sup>3</sup>.</li> </ul>
<i>Automatic Controller/Batch Meter</i>	<ul style="list-style-type: none"> <li>• Flowmeter to allow batch metering;</li> <li>• Automated shutdown and alarm system to prevent overflow of IBC during filling; and</li> <li>• Associated pipework and hoses.</li> </ul>
<i>Pump Set</i>	<ul style="list-style-type: none"> <li>• Maximum flow rate of 5m<sup>3</sup>/hr;</li> <li>• Rating of 0.37 kW; and</li> <li>• Associated pipework and hoses.</li> </ul>
<i>Vent Stack</i>	<ul style="list-style-type: none"> <li>• Outlet at a minimum of 3 meters above the shed roof; and</li> <li>• Associated pipework and hoses.</li> </ul>

Note 1: Specified infrastructure requirements listed in Row 1 are existing.

- The Licensee must not depart from the requirements specified in the Infrastructure Requirements Table except:*
  - where such departure is minor in nature and does not materially change or affect the infrastructure; or*
  - where such departure improves the functionality of the infrastructure and does not increase risks to public health, public amenity or the environment.*
- The Licensee must upon completion of the works as per condition 6.1 provide to the CEO an engineering certification from a suitably qualified professional confirming each item of infrastructure as specified in Table 6.1 has been constructed with no material defects.*
- The Licensee must ensure that the equipment and infrastructure in Table 6.1 are maintained in good working order.*

**Appendix 1: Site Map**

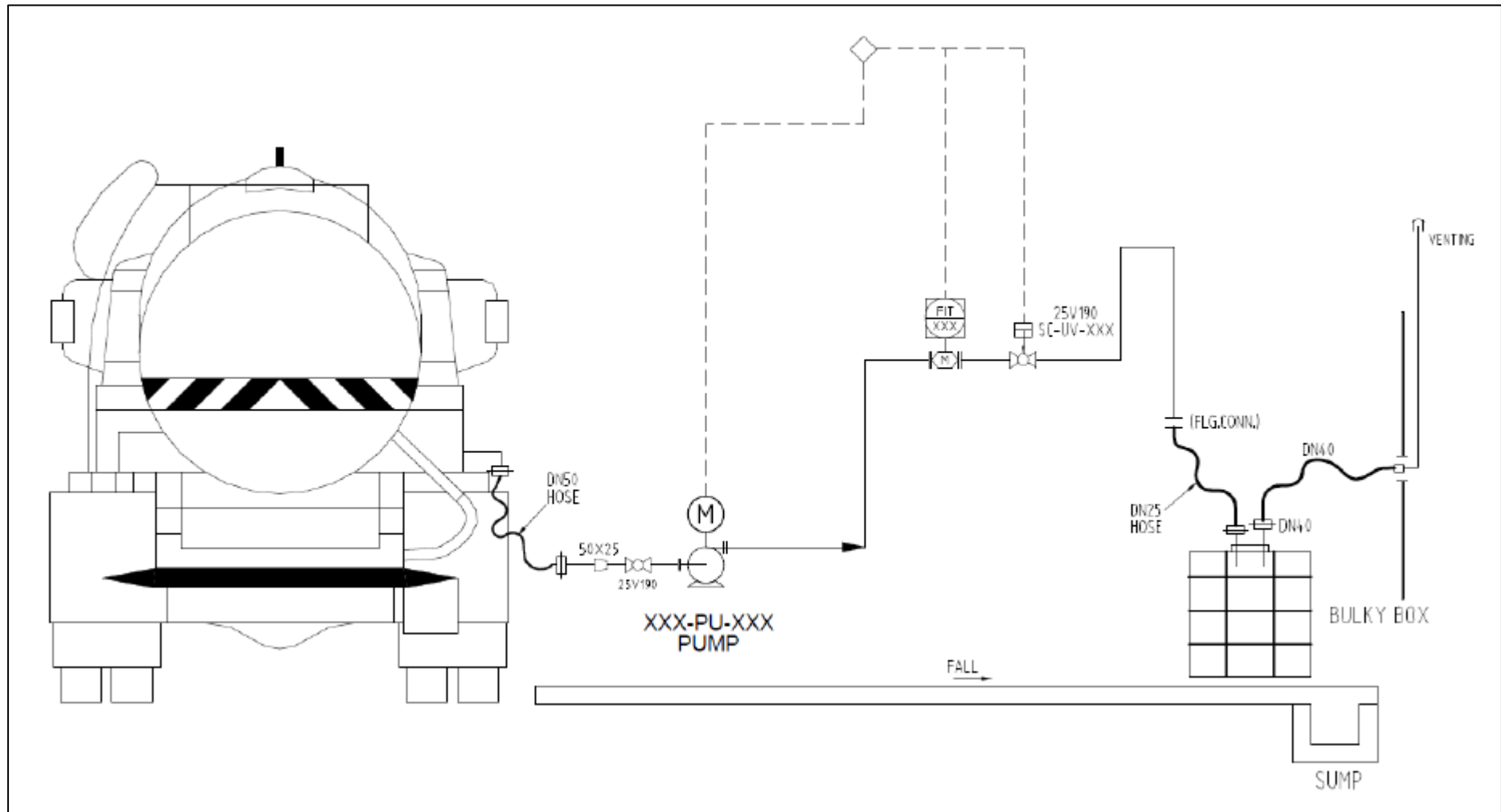


## Appendix 2: Site Plan





### Appendix 3: Schematic of IBC Filling Station



## Appendix 2: Summary of Licensee's comments

Comments received	Comments	DER consideration of risk:
12 October 2016	Licensee emailed stating that they had no comments	N/A