Government of Western Australia
Department of Water and Environmental Regulation

Works Approval

Works approval number	W6828/2023/1
Works approval holder	Dodd & Dodd Group Pty Ltd
ACN	009 238 671
Registered business address	Central Park Level 43 152-158 St Georges Terrace PERTH WA 6000
DWER file number	DER2023/000332~1 and APP-0026210
Duration	30/11/2023 to 30/11/2026
Date of issue	30/11/2023
Date of amendment	25/02/2025
Premises details	C.D. Dodd – Onslow Legal description Part of Lot 550 on Deposited Plan 414367 Reserve 53324 Certificate of Title Volume LR3169 Folio 963 As defined by the coordinates in Schedule 1

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	**Assessed design capacity**
Category 47: Scrap Metal Recovery	No more than 20,000 tonnes per annual period
Category 61A: Solid Waste facility	

This works approval is granted to the works approval holder, subject to the attached conditions, on 25 February 2025, by:

Grace Heydon

Digitally signed by Grace Heydon
Date: 2025.02.25 08:58:02 +08'00'

Grace Heydon
MANAGER WASTE INDUSTRIES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Works approval history

Date	Reference number	Summary of changes
30/11/2023	W6828/2023/1	Works approval granted.
25/02/2025	W6828/2023/1	Extension of time limited operations - change of wording of Condition 5(a) to allow time limited operations to 30 June 2025.

Interpretation

In this works approval:

(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 works approval:

  (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 an 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 works approval requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this works approval.

Works approval conditions

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

Construction phase

Infrastructure and equipment

1. The works approval holder must:

(a) construct and/or install the infrastructure and/or equipment;

(b) in accordance with the corresponding design and construction / installation requirements; and

(c) at the corresponding infrastructure location

as set out in

Table 1.

Table 1: Design and construction / installation requirements

	Infrastructure	Design and construction / installation requirements	Location
1.	Ground liner	Must be constructed using UV treated reinforced polymer treated PVS with a thickness of 0.55 mm. Liner must be installed in single sheets. Must be constructed over compacted in-situ soils. A 100 mm high earthen bund wall must be constructed at the perimeter of each ground liner sheet as depicted in Figure 4.	Installed in the areas depicted in Figure 3.
2.	Portable and collapsible bunds	Must be constructed using UV stable 900 g/sm PVS or polypropylene. Portable bunds must be a minimum of 300 mm high. Collapsible bunds must be a minimum of 100 mm high. Must be fitted with plugs, drains and filters.	Installed in the areas depicted in Figure 3.
3.	Chemical cleaning (HEFU) stations	Underlying ground must be 150 mm of clean compacted road base. Must be located on top of an area with ground liner installed. Must be located within a bunded steel container on top of portable secondary bunds which are a minimum of 100 mm high. Must be capable of collecting all wastewater and scale.	As depicted in Figure 2.
4.	Automatic High Pressure Decontamination Facility (AHDF)	Underlying ground must be 150 mm of clean compacted road base Must be located on top of an area with ground liner installed.	As depicted in Figure 2.

	Infrastructure	Design and construction / installation requirements	Location
		Must be located within portable secondary bunds. Must be fitted with a roof cover, spray curtain and cowlings capable of preventing spray drift. Spray curtain must be constructed using either 3 mm thick 150 mm wide UV stabalised polyester strips. Must be capable of collecting all wastewater.	
5.	Washdown area	Must be constructed to the specifications outlined in Figure 6. Underlying ground must be 150 mm of clean compacted road base. Must be self-bunded and capable of containing all wash water.	As depicted in Figure 2.
6.	Wastewater treatment infrastructure	Underlying ground must be compacted in-situ soil. Must be located on top of an area with ground liner installed. Must be located within a bunded container on top of portable secondary bunds which are a minimum of 300 mm high. Must contain a slotted spear filter (1,000 µm), a self-cleaning filter (50 µm) and a duplex filter (1 µm). Filtration mediums within the treatment infrastructure must be capable of removing Mercury, NORMs, Hydrocarbons and BTEX chemicals from wastewater. Must incorporate a closed loop containment system to prevent leaks and spills.	Adjacent to the HPWJ and AHDF stations ss depicted in Figure 2.
7.	Waste items storage areas (contaminated)	Underlying ground must be compacted in-situ soil. Must be located on top of an area with ground liner installed. Storage racks must be located within portable secondary bunds which are a minimum of 300 mm high.	As depicted in Figure 2.
8.	Waste items storage areas (decontaminated)	Underlying ground must be compacted in-situ soil.	As depicted in Figure 2.
9.	NORM and mercury waste storage area	Underlying ground must be compacted in-situ soil. Must be located on top of an area with ground liner installed. Wastes must be located within portable secondary bunds which are a minimum of 100 mm high.	As depicted in Figure 2.

	Infrastructure	Design and construction / installation requirements	Location
10.	Scrap metal processing area	Underlying ground must be 150 mm of clean compacted road base to a 98% maximum density.	As depicted in Figure 2.
11.	Fuel tank and fueling station	Underlying ground must be 150 mm of clean compacted road base. Must be self-bunded and capable of containing all leaks and spills.	As depicted in Figure 2.

Compliance reporting

2. The works approval holder must within 30 calendar days of an item of infrastructure or equipment required by condition 1 being constructed and/or installed:

(a) undertake an audit of their compliance with the requirements of condition 1; and

(b) prepare and submit to the CEO an Environmental Compliance Report on that compliance.

3. The Environmental Compliance Report required by condition 2, must include as a minimum the following:

(a) certification by a suitably qualified civil or structural engineer that the items of infrastructure or component(s) thereof, as specified in condition 1, have been constructed in accordance with the relevant requirements specified in condition 1;

(b) as constructed plans and a detailed site plan for each item of infrastructure or component of infrastructure specified in condition 1; and

(c) be signed by a person authorised to represent the works approval holder and contains the printed name and position of that person.

Time limited operations phase

Commencement and duration

4. The works approval holder may only commence time limited operations for an item of infrastructure identified in condition 1 where the Environmental Compliance Report as required by condition 2 has been submitted by the works approval holder for that item of infrastructure.

5. The works approval holder may conduct time limited operations for an item of infrastructure specified in condition 6 (as applicable);

(a) Until 30 June 2025; or

(b) until such time as a licence for that item of infrastructure is granted in accordance with Part V of the *Environmental Protection Act 1986*, if one is granted before the end of the period specified in condition 5(a).

Time limited operations requirements and emission limits

6. During time limited operations, the works approval holder must ensure that the premises infrastructure and equipment listed in

7. Table 2 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in

8. Table 2.

Table 2: Infrastructure and equipment requirements during time limited operations

	Site infrastructure and equipment	Operational requirement	Location
1.	Ground liner	Integrity of liner must be maintained.	In the areas depicted by Figure 3.
2.	Portable and collapsible bunds	• Integrity of UV stable 900 gsm PVS or polypropylene used to construct bund to be maintained. • A minimum height of 300 mm must be maintained for portable bunds • A minimum height of 100 mm must be maintained for collapsible bunds • Bunds must be sized around containment infrastructure so as to be able to contain more than 125% of the volume of the largest container stored within the bunded area. • Liquid contaminated with spills or leaks of environmentally hazardous material contained within bunds must not be discharged to the environment.	In the areas depicted by Figure 3.
3.	Chemical cleaning (HEFU) stations	• All wastewater generated from decontamination activities must be contained within the station. • Chemicals required for use in decontamination activities must be stored within the bunded area. • Wastewater must only be reused within the station where it has been successfully filtered to less than 1 micron. • Wastewater must be taken to the AHDF for treatment and transported within impermeable vessels.	As depicted in Figure 2.
4.	AHDF station	• All wastewater generated from decontamination activities must be contained within the station. • Wastewater must only be reused within the station where it has been successfully filtered to less than 1 micron.	As depicted in Figure 2.
5.	Washdown area	All wastewater generated from decontamination activities must be contained within the washdown area.	As depicted in Figure 2.
6.	Wastewater treatment infrastructure	• All filters must be maintained in good working order. • Chemicals required for use in	As depicted in Figure 2.

	Site infrastructure and equipment	Operational requirement	Location
		decontamination activities must be stored within the bunded area.	
7.	Waste items storage areas (contaminated)	Waste items must be stored over portable bunded areas as depicted in Figure 5.	As depicted in Figure 2.
8.	Waste items storage areas (decontaminated)	Wastes must only be stored in this area when the decontamination clearance levels listed in Table 7 have been achieved for identified contaminants.	As depicted in Figure 2.
9.	NORM and mercury waste storage area	Integrity of storage vessels within the storage area must be maintained.	As depicted in Figure 2.
10.	Scrap metal processing area	Resizing of metal items must only occur during daylight hours.	As depicted in Figure 2.
11.	Fuel tank and fueling station	Must be maintained in good working order.	As depicted in Figure 2.

Waste acceptance

9. The works approval holder must only accept onto the premises waste of a waste type, which does not exceed the corresponding rate at which waste is received, and which meets the corresponding acceptance specification set out in Table 3.

Table 3: Types of waste authorised to be accepted onto the premises

Waste type	Rate at which waste is received	Acceptance specification
Offshore decommissioned infrastructure	20,000 tonnes per annual period	• On arrival at the premises, wastes must be assessed for contamination in accordance with Condition 10. • Once assessed for contamination, wastes must be stored in a bunded area prior to processing.

10. The works approval holder must inspect and survey each item of offshore decommissioned infrastructure known to have contained production liquids, gases or well service gas accepted at the premises in accordance with Table 4.

11. In the event that a criterion in Table 4 exceeds the corresponding trigger level specified for that criterion, the works approval holder must consider that item of offshore decommissioned infrastructure as contaminated.

Table 4: Contamination inspection / survey criteria and trigger levels for offshore decommissioned infrastructure

Criteria	Equipment	Trigger levels
NORM Surface Contamination	Contamination Meter	≥0.2 Bq/cm^2
NORM Surface Gamma Dose Rate	Gamma Survey Meter	Above twice reference background (µSv/h)

Mercury Vapour (Elemental)	Mercury Vapour Monitor	>12.5 µg/m^2
Mercury in Scale and Surface Bound Mercury	pXRF Surface Measurement	>1 ppm
Hydrogen Sulphide (H_2S)	H_2S Gas Monitor – Microclip X3 4-Gas Detector	>5 ppm
Benzene (BTEX)	PID Gas Monitor – UltraRAE 3000+	>0.5 ppm VOC >0.5 ppm benzene

12. The works approval holder must undertake container floor surveys after the unloading of contaminated offshore decommissioned infrastructure in accordance with Table 5.

13. In the event that a criterion in Table 5 exceeds the corresponding trigger level specified for that criterion, the works approval holder must undertake the corresponding management action listed for that criterion, until the clearance criteria is met for that criterion.

Table 5: Floor contamination survey

Criteria	Equipment	Trigger levels	Management action	Clearance criteria
NORM Surface Contamination	Contamination Meter	≥0.2 Bq/cm^2	• Floor must be vacuumed with a HEPA filter vacuum. • If contamination remains after this action, floor must also be washed down and wastewater from this process captured for treatment through the wastewater treatment infrastructure.	<0.2 Bq/cm^2 above BG
Mercury Vapour (Elemental)	Mercury Vapour Monitor	>12.5 µg/m^2	• Floor must be vacuumed with a HEPA filter vacuum. • If contamination remains after this action, affected surface must be sprayed with MeDex and resulting mercury salt removed using the HEPA filter vacuum when dry.	<0.012 mg/m^3
Mercury in Scale and Surface Bound Mercury	pXRF Surface Measurement	>1 ppm		<MDL (<90 ppm) <20 µg/cm^2

Waste processing

14. The works approval holder must ensure that the waste types specified in Table 6 are only subjected to the corresponding process(es), subject to the corresponding

process limits and/or specifications.

Table 6: Waste processing

Waste type	Process(es)	Process limits and/or specifications
Offshore decommissioned infrastructure (Contaminated)	Decontamination activities	• Wastes contaminated with NORMs, mercury, H_2S and/or BTEX must be decontaminated within the HEFU stations or the AHDF station. • Wastes contaminated with marine growth only may be decontaminated in the concrete washdown area. • All chemicals used for decontamination must be stored within the HEFU stations.
Offshore decommissioned infrastructure (Not contaminated / decontaminated)	Scrap metal processing	• Metal items to be resized using oxy cutting or shearing only. • Umbilicals and flowline pipes to be processed within the processing building. • Recovered plastic must be processed within the processing building.
	Storage prior to removal from site	• Stockpiles of scrap metal must not exceed 3 m in height or occupy an area of more than 100 m^2 at any one time. • Recovered plastic must be stored in impermeable containers.
Wastewater generated from decontamination activities	Wastewater treatment	• Must only be treated within wastewater treatment infrastructure. • Solid particulates must be removed using filters and settling tanks. • Wastewater must only be assessed for reuse within the HEFU stations or the AHDF station where it has been successfully filtered to less than 1 micron. • Where wastewater cannot be filtered to less than 1 micron, it must be tested for disposal in accordance with Condition 19.

15. The works approval holder must only reuse treated wastewater within the HEFU stations or the AHDF station for decontamination activities.

The works approval holder must inspect and survey each item of contaminated offshore decommissioned infrastructure after it has undergone decontamination activities in accordance with

16. Table 7.

The works approval holder must only consider an item of contaminated offshore decommissioned infrastructure decontaminated in the event that a criterion in

17. Table 7 is below the corresponding clearance level specified for that criterion.

Table 7: Decontamination acceptance criteria and testing methods

Criteria	Equipment	Clearance levels
NORM Surface Contamination	Contamination Meter	<0.2 Bq/cm^2 above BG
NORM Surface Gamma Dose Rate	Gamma Survey Meter	<2 x BG (µSv/h)
Mercury Vapour (Elemental)	Mercury Vapour Monitor	<0.012 mg/m^3
Elemental Mercury (Liquid)	Visual	None
Mercury in Scale and Surface Bound Mercury	pXRF Surface Measurement	<MDL (<90 ppm) <20 µg/cm^2
Hydrogen Sulphide (H_2S)	H_2S Gas Monitor – Microclip X3 4-Gas Detector	<5 ppm
Benzene (BTEX)	PID Gas Monitor – UltraRAE 3000+	<0.5 ppm

18. The works approval holder must store treated wastewater in impermeable, leak free Intermediate Bulk Containers (IBCs) or equivalent containment vessels within a bunded area of the premises prior to disposal off site.

19. The works approval holder must not remove treated wastewater from the premises to an appropriate licenced facility for disposal unless the disposal contaminant criteria outlined in Table 8 have been demonstrated for that container of wastewater.

Table 8: Wastewater disposal contaminant criteria

Contaminant	Disposal criteria	Method
Oil in water	<30 ppm	ASTM D95
Mercury	<0.1 µg/L	USEPA Method 7473
NORM – Gross alpha / beta	<0.5 Bq/L	USEPA Method 900.0/302
NORM – Ra226 or RA228	<1.1 Bq/L	USEPA Method 900.0/302

20. The works approval holder must immediately recover, or remove and dispose of, spills of environmentally hazardous materials including potentially contaminated wastewater, fuel, oil, or other hydrocarbons, whether inside or outside an engineered containment system.

21. The works approval holder must ensure that all material used for the recovery, removal, and/or disposal of environmentally hazardous materials is stored in an impermeable container prior to disposal at an appropriately authorised facility.

22. The works approval holder must take all reasonable and practicable measures to prevent stormwater run-off becoming contaminated by the activities and operations undertaken at the premises.

Monitoring

23. The works approval holder must record the total amount of waste accepted onto the premises, for each waste type listed in Table 9, in the corresponding unit, and for each corresponding time period, as set out in Table 9.

Table 9: Waste accepted onto the premises

Waste type	Unit	Time period
Offshore decommissioned infrastructure	Tonnes	Each load arriving at the premises

24. The works approval holder must record the total amount of waste removed from the premises, for each waste type listed in Table 10, in the corresponding unit, and for each corresponding time period set out in Table 10.

Table 10: Waste removed from the premises

Waste type	Unit	Time period
Scrap metal	Tonnes	Each load leaving the premises
Recovered plastic		
Contaminated filters from wastewater infrastructure		
Wastewater	m^3	

25. Prior to removal from site for disposal, the works approval holder must classify the contaminated filters from wastewater infrastructure using the *Landfill Waste Classification and Waste Definitions 1996* to determine the correct class of landfill this waste can be disposed of to.

Compliance reporting

26. The works approval holder must submit to the CEO a report on the time limited operations within 30 calendar days of the completion date of time limited operations or 30 calendar days before the expiration date of the works approval, whichever is the sooner.

27. The works approval holder must ensure the report required by condition 26 includes the following:

(a) a summary of the time limited operations, including timeframes and amount of offshore decommissioning infrastructure processed;

(b) an itemised summary of offshore decommissioned infrastructure accepted to the premises, including the proportion of offshore decommissioned infrastructure which was classified as contaminated on acceptance to the premises.

(c) a summary of wastes removed from the premises in accordance with condition 24, including the proportion of treated wastewater which was retained on the premises for reuse within the HEFU stations or the AHDF station;

(d) a summary of the environmental performance of all infrastructure as constructed or installed (as applicable);

(e) a review of performance and compliance against the conditions of the works approval; and

(f) where the manufacturer's design specifications and the conditions of this works approval have not been met, what measures will the works approval holder take to meet them, and what timeframes will be required to implement those measures.

Records and reporting (general)

28. The works approval holder must record the following information in relation to complaints received by the works approval 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 works approval holder to investigate or respond to any complaint.

29. The works approval holder must maintain accurate and auditable books including the following records, information, reports, and data required by this works approval:

(a) the works conducted in accordance with condition 1;

(b) any maintenance of infrastructure that is performed in the course of complying with condition 6; and

(c) complaints received under condition 28.

30. The books specified under condition 29 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 works approval holder for the duration of the works approval; and

(d) be available to be produced to an inspector or the CEO as required.

Definitions

In this works approval, the terms in Table 11 have the meanings defined.

Table 11: Definitions

Term	Definition
AHDF	Automated High-Pressure Decontamination Facility
ASTM D95	*ASTM D95 Standard Test Method for Water in Petroleum Products and Bituminous Materials by Distillation*
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department administering the *Environmental Protection Act 1986* Locked Bag 10 Joondalup DC WA 6919 info@dwer.wa.gov.au
Department	means the department established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V Division 3 of the EP Act.
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.
Environmental Compliance Report	means a report to satisfy the CEO that the conditioned infrastructure and/or equipment has been constructed and/or installed in accordance with the works approval.
EP Act	*Environmental Protection Act 1986* (WA).
EP Regulations	*Environmental Protection Regulations 1987* (WA).
HEFU	High energy flushing unit
HPWJ	High pressure water jet
Offshore decommissioned infrastructure	means containers and structures retrieved from decommissioned hydrocarbon fields including but not limited to skids, heat exchangers, subsea tree production systems, chains and anchors.
premises	the premises to which this works approval applies, as specified at the front of this works approval and as shown on the premises map (Figure 1) in Schedule 1 to this works approval.

Term	Definition
prescribed premises	has the same meaning given to that term under the EP Act.
production liquids, gases or well service gas	means products or wastes generated within offshore hydrocarbon fields containing mercury, NORMs, hydrogen sulphide, BTEX chemicals or any other potentially environmentally hazardous contaminants
suitably qualified civil or structural engineer	means a person who: a) holds a Bachelor of Engineering recognized by Engineers Australia; and b) has a minimum or 5 years of experience; and c) is employed by an independent third party external to the works approval holder's business; or is otherwise approved in writing by the CEO to act in this capacity.
time limited operations	refers to the operation of the infrastructure and equipment identified under this works approval that is authorised for that purpose, subject to the relevant conditions.
USEPA Method 7473	*USEPA Method 7473: Mercury in Solids and Solutions by Thermal Decomposition, Amalgamation, and Atomic Absorption Spectrophotometry*
USEPA Method 900.0/302	*USEPA Method 900.0/302: Gross Alpha and Gross Beta Radioactivity in Drinking Water*
waste	has the same meaning given to that term under the EP Act.
works approval	refers to this document, which evidences the grant of the works approval by the CEO under section 54 of the EP Act, subject to the conditions.
works approval holder	refers to the occupier of the premises being the person to whom this works approval has been granted, as specified at the front of this works approval.

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown by the red line in the map below

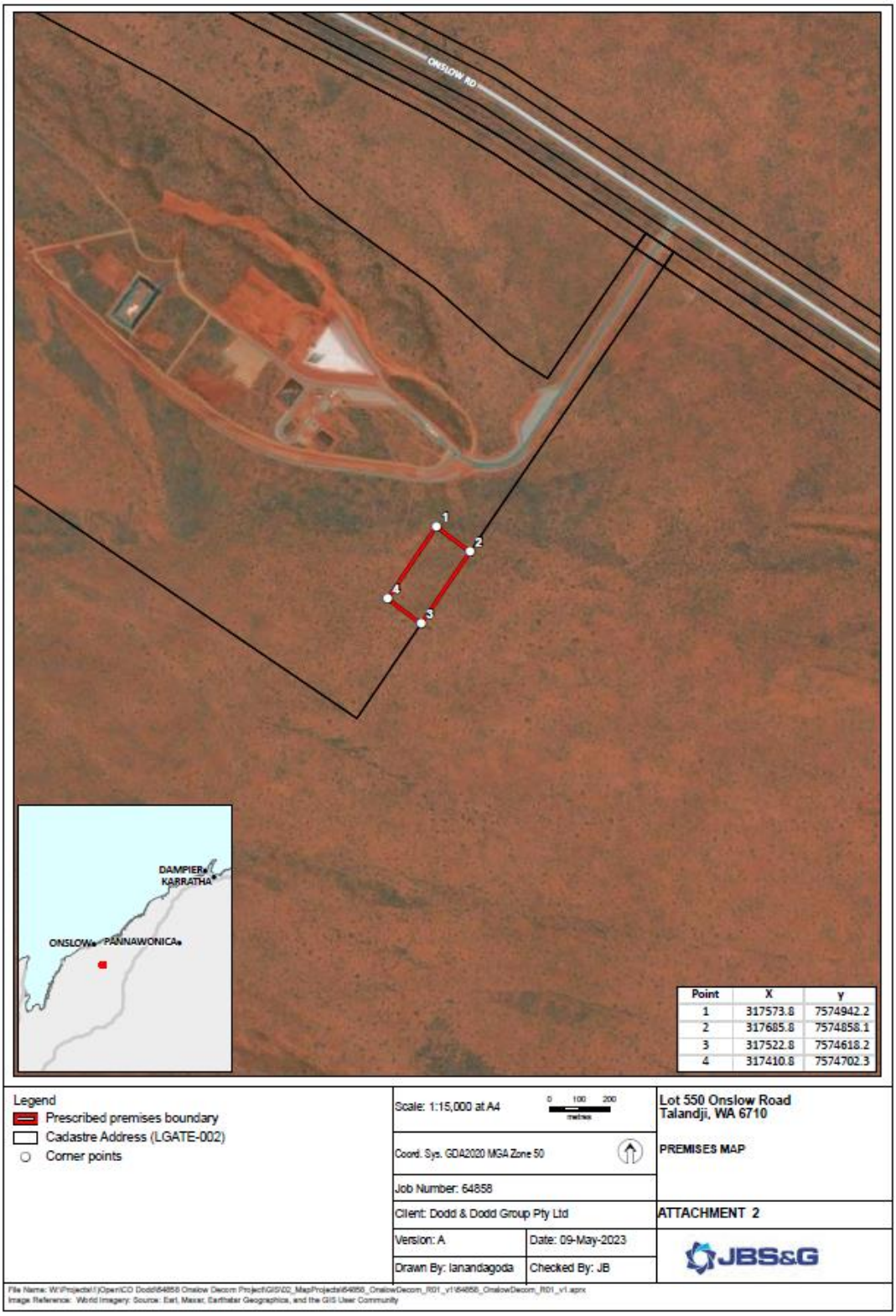

Figure 1: Map of the boundary of the prescribed premises

Premises layout

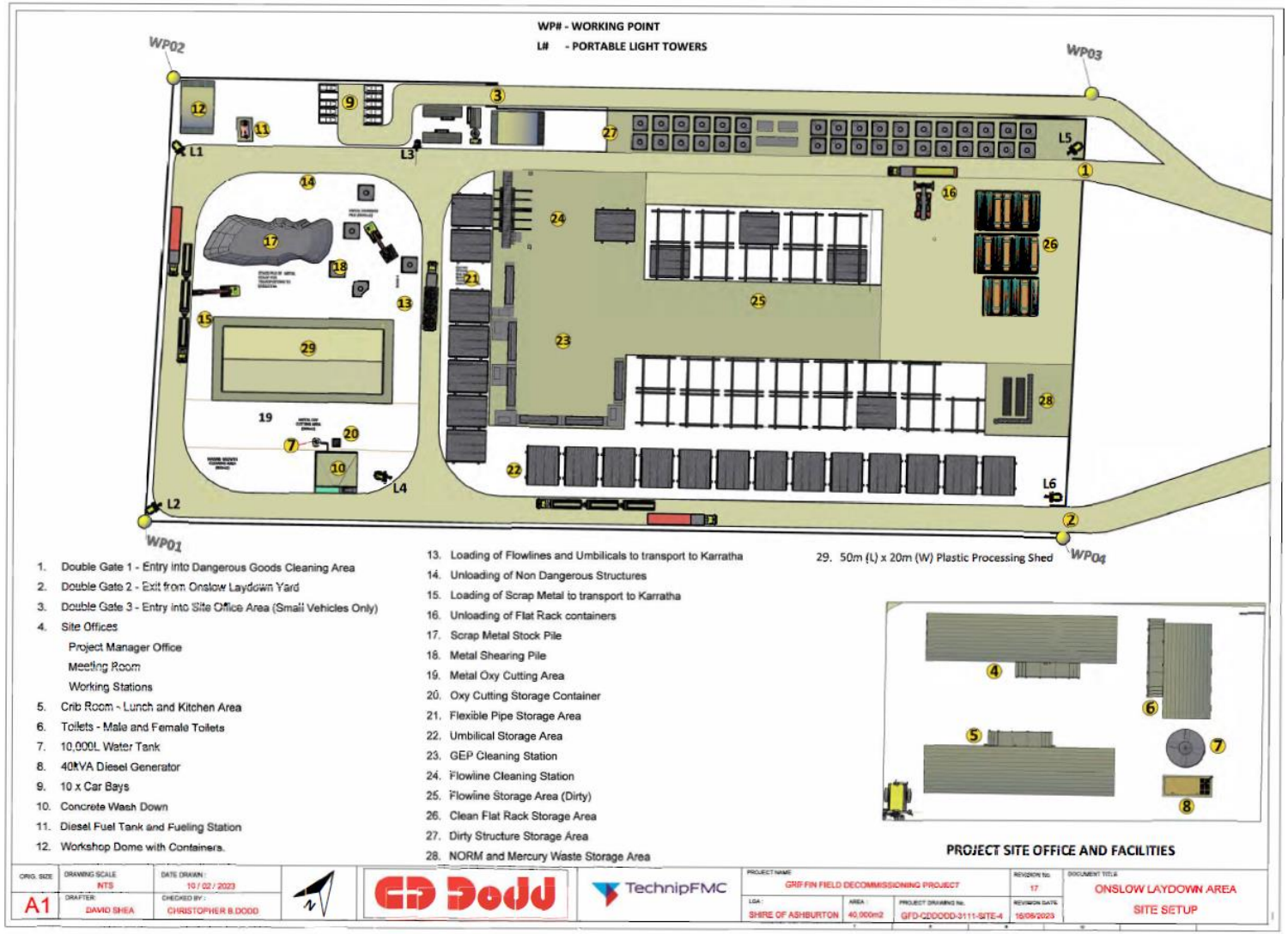

Figure 2: Premises layout

Location of bunding and construction specifications

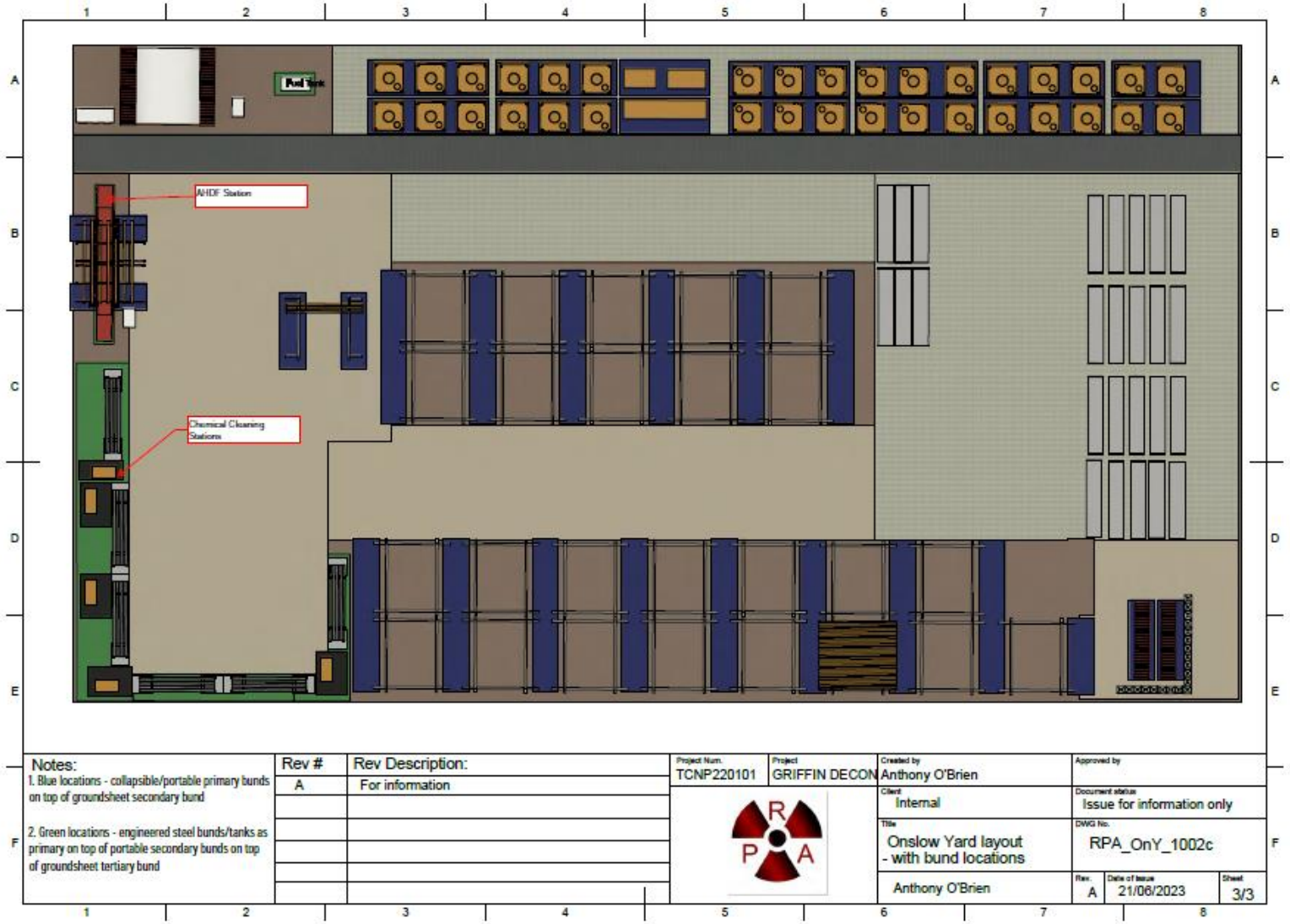

Figure 3: Location of bunding within operational areas of the premises

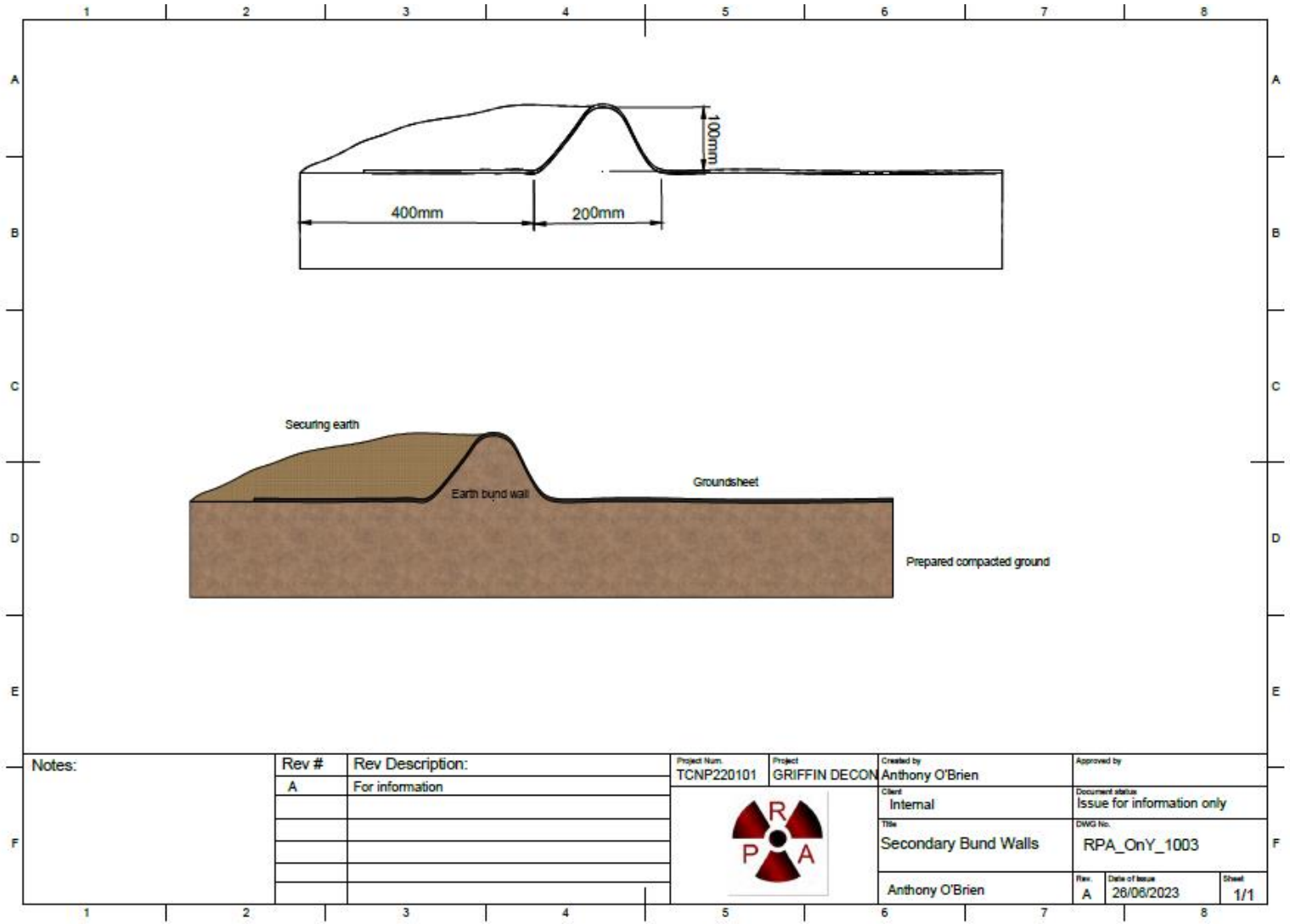

Figure 4: Ground liner installation

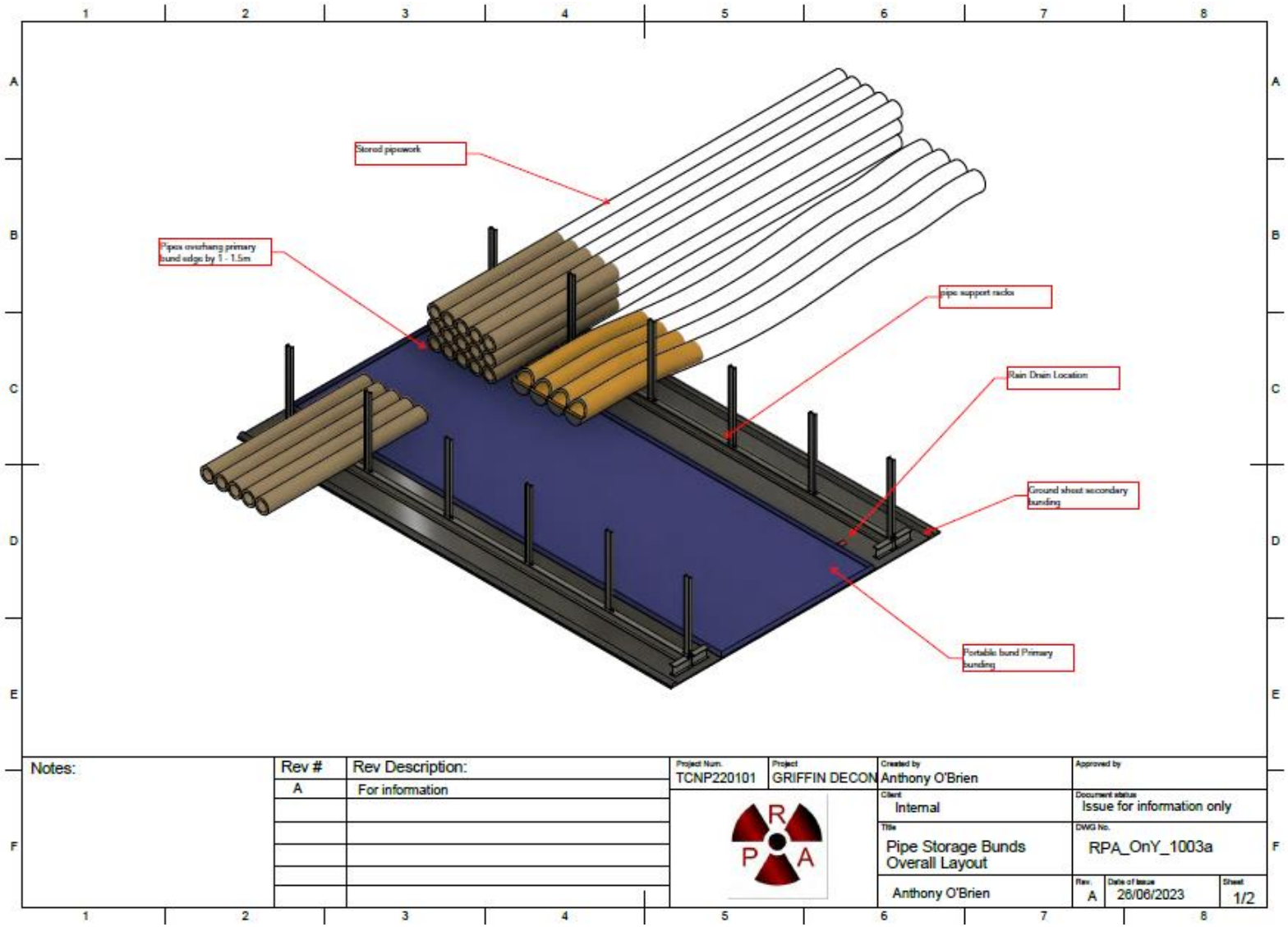

Figure 5: Pipe storage with portable bunding

Wash bay specifications

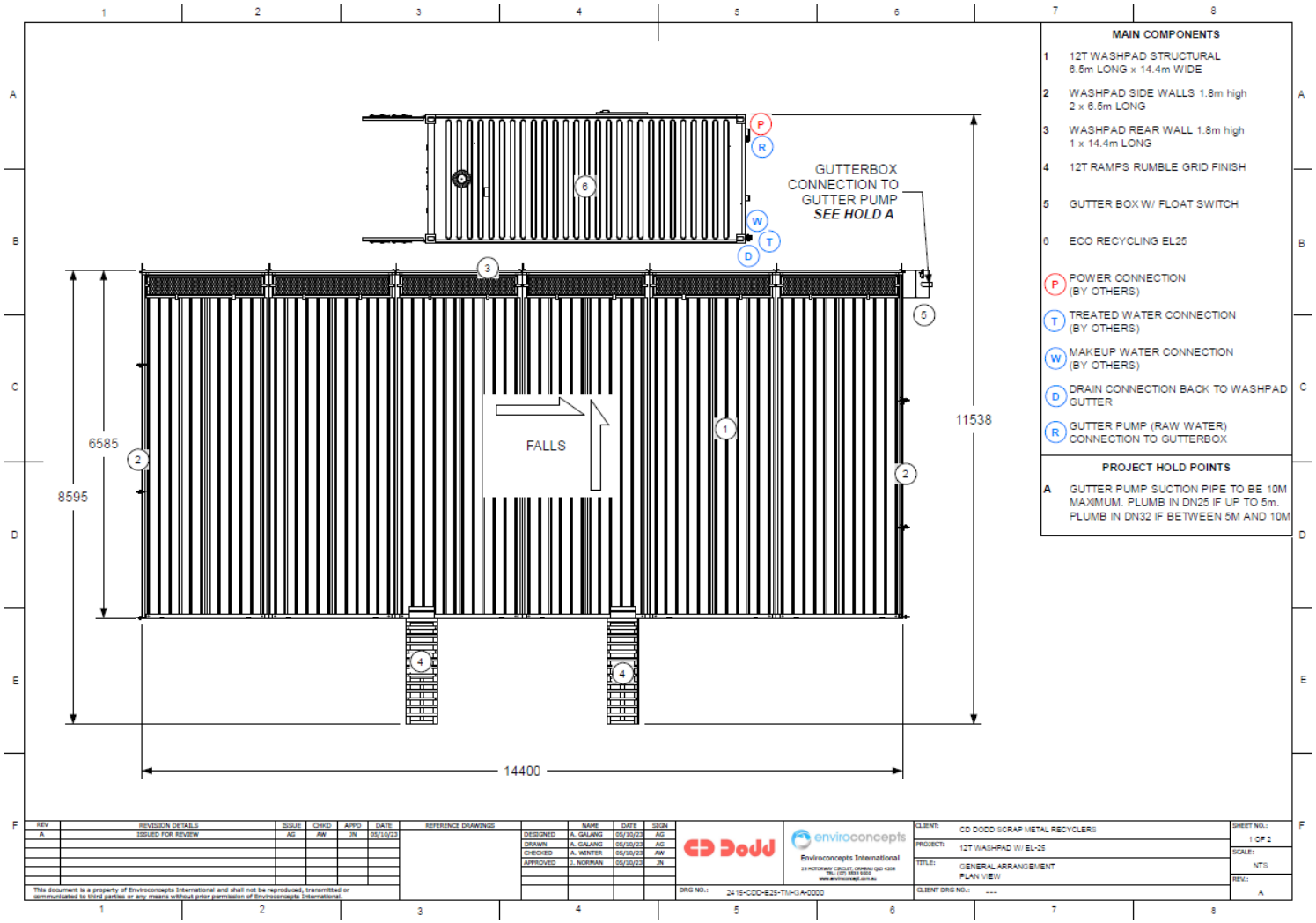

Figure 6: Wash bay construction specifications

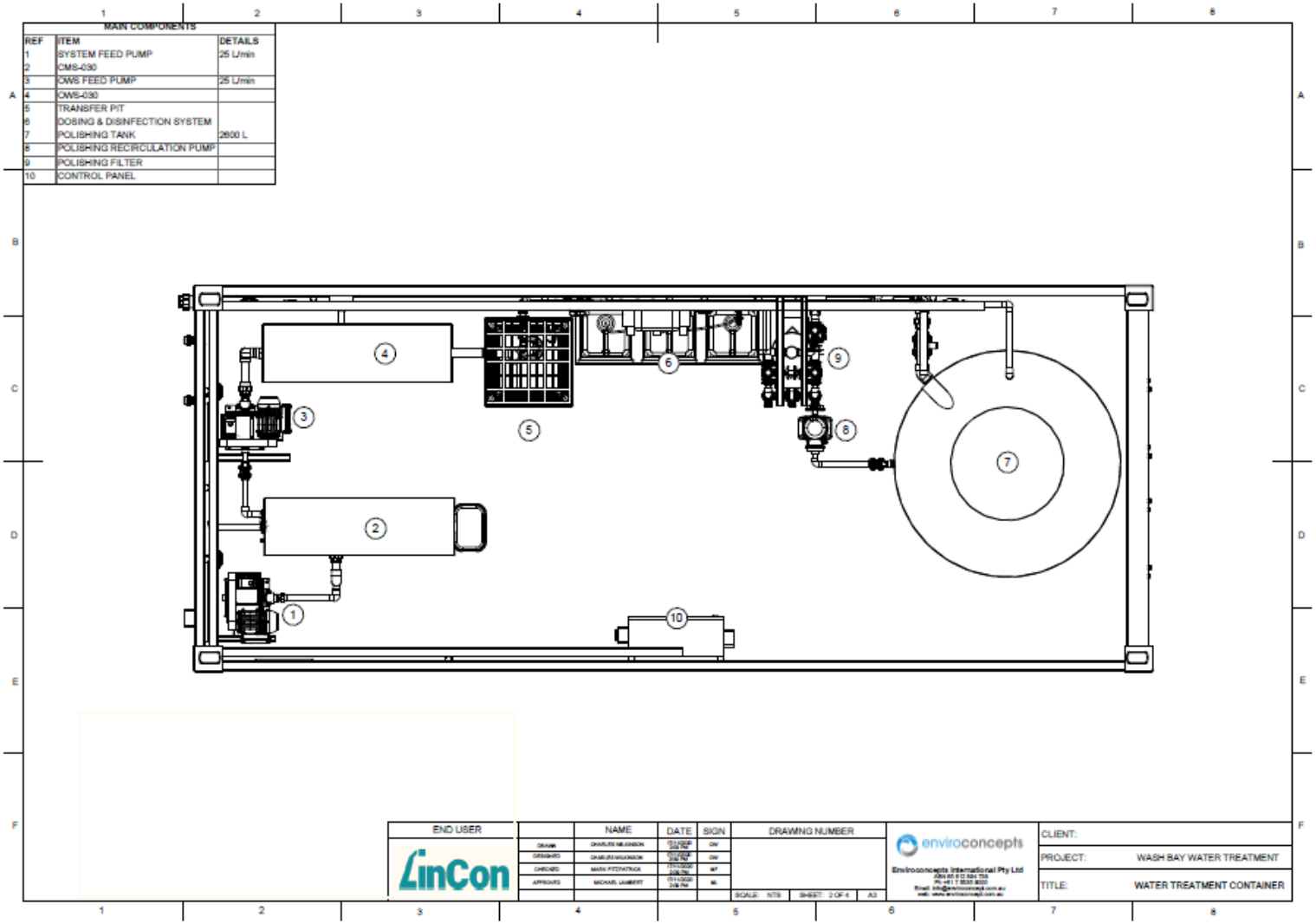

Figure 7: Wash bay water filtration unit

AHDF general layout

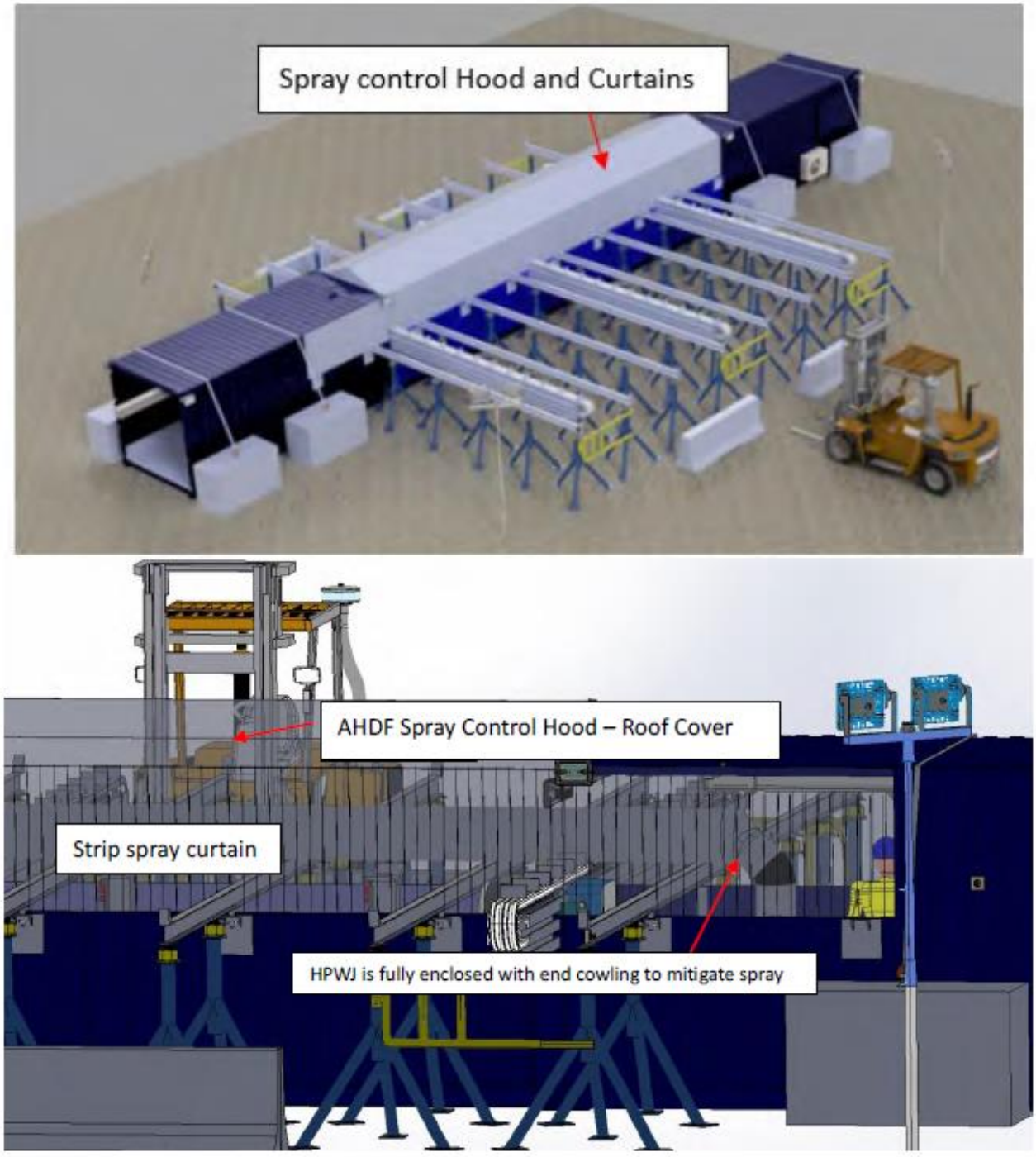

Figure 8: AHDF general layout

Schedule 2: Premises boundary

The corners of the premises boundary are the coordinates listed in Table 12.

Table 12: Premises boundary coordinates (GDA2020)

	Easting	Northing
1.	317573.8	7574942.2
2.	317685.8	7574858.1
3.	317522.8	7574618.2
4.	317410.8	7574702.3