



Licence

Environmental Protection Act 1986, Part V

Licensee: Karratha Recycling Pty Ltd

Licence: L8861/2014/1

Registered office: Lakeside Corporate
Unit 16, 24 Parkland Road
OSBORNE PARK WA 6017

ACN: 163 991 106

Premises address: Karratha Recycling Liquid Waste Facility
Lot 111 and 112 Exploration Drive
GAP RIDGE WA 6714
As depicted in Schedule 1

Issue date: Thursday, 29 January 2015

Commencement date: Monday, 2 February 2015

Expiry date: Saturday, 1 February 2020

Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved premises production or design capacity
35	Asphalt manufacturing - premises on which hot or cold mix asphalt is produced using crushed or ground rock aggregates mixed with bituminous or asphaltic materials for use at a place or premises other than those premises.	Not Applicable	40,000 tonnes per annual period
61	Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	1,000 tonnes or more per year	20,000 tonnes per annual period
61A	Solid Waste Facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated or discharged onto land	1,000 or more tonnes per year	20,000 tonnes per annual period

Conditions

This licence is subject to the conditions set out in the attached pages.

.....
Jonathan Bailes

Officer delegated under section 20
of the *Environmental Protection Act 1986*



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the Licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your Licence. Non-compliance with your Licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

The Karratha Recycling Liquid Waste Facility is located within the City of Karratha at the Gap Ridge Industrial Estate approximately 12 kilometres (km) from Karratha and 9.2 km from Dampier.

The liquid waste facility was initially constructed under works approval W5538/2013/1 and consists of a three stage liquid waste stabilisation process to remediate septage waste and low level grease trap waste. The facility consists of two receiving (anaerobic) ponds, one facultative (aerobic) pond, and one evaporation pond. Planned Infrastructure on site includes a shed, adjoining office area, car park, weighbridge, drainage and recycled water storage. The facility is designed to cater for a maximum of 20,000 tonnes of liquid waste per year. Works Approval W5806/2014/1 was subsequently issued to enable an expansion of the liquid waste facility throughput capacity to 100,000 tonnes per annual period.

Works Approval W5579/2014/1 was issued to Karratha Asphalt Pty Ltd (Karratha Asphalt) to construct and operate an asphalt plant at this Premises. This work has been completed and a compliance certificate was submitted on 19 September 2014. Commissioning of the asphalt plant was subsequently completed as a requirement of the Works Approval.

2015 Amendment

Karratha Asphalt will operate the asphalt plant under the current licence issued to Karratha Recycling. Karratha Asphalt has signed a lease agreement with Karratha Recycling to operate the Asphalt Plant on Lot 112 Exploration Drive. Karratha Recycling and Karratha Asphalt both have common directors.

The Asphalt plant is an Almix 60UFG – skid mounted uniflow series that has a design production capacity of 100 tonnes per hour under ideal conditions. The asphalt plant will be fed by a front end loader from ground bunkers (sand and aggregates) into cold feed bins. Each cold feed bin has a variable speed feed belt drive allowing the required mix proportions to be set by the operator. The combined raw material feed is transported by conveyor belt to the dryer/mixer drum. The dryer/mixer combines the functions of a dryer and a continuous mixer in one efficient system. The aggregate and sand is dried in the inner drum; after mixing the addition of bitumen, filler and Reclaimed Asphalt Pavement (RAP) takes place after the recycle collar on the drum. When the mix is discharged from the mixer it is transported by a slat conveyor system to the hotmix storage silos.

The main potential emissions from the site are emissions to air in from the baghouse of the asphalt plant; the most significant of these are particulate matter (PM), oxides of nitrogen (NOx), volatile organic compounds (VOC) and carbon monoxide (CO).

Other discharges and emissions include discharges of wastewater to land (and potentially to groundwater) and fugitive emissions in the form of odour from the liquid waste facility. The closest residential receptor is located at Madigan Estate approximately 2.7km to the north east. Temporary accommodation is located 2.1km away also to the north east.



According to the City of Karratha zoning classifications the site is located within an area classified as 'noxious'. Given the remoteness of the site from sensitive receptors, odour emissions are considered low risk, however, odour emissions are managed by the ongoing operation, maintenance and de-sludging of the ponds.

The Licences and works approvals issued for the Premises since 20/2/2014 are:

Instrument log		
Instrument	Issued	Description
W5538/2013/1	20/02/2014	New Works Approval for a liquid waste facility
L8861/2014/1	22/01/2015	New Licence
W5579/2014/1	06/03/2015	Construction of asphalt plant
W5806/2014/1	19/03/2015	Expansion of the liquid waste facility
L8861/2014/1	30/07/2015	Licence amendment to include Works Approval W5579/2014/1 and operation of an asphalt plant.

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 1 January until 31 December in the same year;

'AS 4323.1' means the Australian Standard AS4323.1 *Stationary Source Emissions Method 1: Selection of sampling positions*;

'AS/NZS 5667.1' means the Australian Standard AS/NZS 5667.1 *Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples*;

'AS/NZS 5667.11' means the Australian Standard AS/NZS 5667.11 *Water Quality – Sampling – Guidance on sampling of groundwaters*;

'averaging period' means the time over which a limit is measured or a monitoring result is obtained;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means:

Manager Licensing (Waste Industries)

At the following address:

Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850
Telephone: (08) 9333 7510
Facsimile: (08) 9333 7550
Email: industry.regulation@der.wa.gov.au;

'controlled waste' has the definition in *Environmental Protection (Controlled Waste) Regulations 2004*;

'dangerous goods' has the meaning defined in the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*;

'effluent' means all liquid waste, treated or otherwise;

'freeboard' means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point;

'leachate' means liquid released by or water that has percolated through waste and which contains some of its constituents;

'Licence' means this Licence numbered L8861/2014/1 and issued under the Act;



'Licensee' means the person or organisation named as Licensee on page 1 of the Licence;

'mAHD' means meters above Australian Height Datum;

'NATA' means the National Association of Testing Authorities, Australia;

'NATA accredited' means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

'PM' means total particulate matter including both solid fragments of material and miniscule droplets of liquid;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

'Processed RAP' means RAP which has been crushed and/or screened to size for recycling into new asphalt;

'RAP' means Reclaimed Asphalt Pavement which consists of surplus plant mix or the material reclaimed from an asphalt wearing or intermediate course by cold planing;

'Schedule 1' means Schedule 1 of this Licence unless otherwise stated;

'Schedule 2' means Schedule 2 of this Licence unless otherwise stated;

'six monthly' means the 2 inclusive periods from 1 January to 30 June and 1 July to 31 December each year;

'spot sample' means a discrete sample representative at the time and place at which the sample is taken;

'stack test' means a discrete set of samples taken over a representative period at normal operating conditions;

'start-up' means the period when plant or equipment is brought from inactivity to normal operating conditions;

'STP dry' means standard temperature and pressure (0°Celsius and 101.325 kilopascals respectively), dry;

'USEPA' means United States (of America) Environmental Protection Agency;

'USEPA Method 2' means United States (of America) Environmental Protection Agency Method for Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pilot Tube);

'USEPA Method 5' means United States (of America) Environmental Protection Agency Method for Determination of Particulate Matter Emission From Stationary Sources;

'USEPA Method 6C' means United States (of America) Environmental Protection Agency Method for Determination of Sulfur Dioxide Emissions From Stationary Sources (Instrumental Analyzer Procedure);

'USEPA Method 7E' means United States (of America) Environmental Protection Agency Method for Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental analyser Procedure);

'USEPA Method 10' means United States (of America) Environmental Protection Agency Method for Determination of Carbon Monoxide Emissions From Stationary Sources (Instrumental Analyzer Procedure);



'USEPA Method 17' means United States (of America) Environmental Protection Agency Method for Determination of Particulate Matter Emission From Stationary Sources;

'USEPA Method 18' means the USEPA Method 18 - Measurement of Gaseous Organic Compound Emissions By Gas Chromatography;

'usual working day' means 0500 – 1700 hours, Monday to Saturday excluding public holidays in Western Australia;

'Waste Code' means the Waste Code assigned to a type of controlled waste for purposes of waste tracking and reporting as specified in the Department of Environment Regulation "Controlled Waste Category List" (July 2014), as amended from time to time;

'WQPN 26' means the Department of Water, *Water Quality Protection Notes 26 – Liners for containing pollutants, using synthetic liners*; and

'WQPN 27' means the Department of Water, *Water Quality Protection Notes 26 – Liners for containing pollutants, using engineered soils*.

- 1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.
- 1.1.4 Any reference to a guideline or code of practice in the Licence means the current version of the guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guidelines or code of practice made during the term of this Licence.
- 1.1.5 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

1.2 General conditions

- 1.2.1 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.
- 1.2.2 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.
- 1.2.3 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.¹

Note1: The *Environmental Protection (Unauthorised Discharges) Regulations 2004* make it an offence to discharge certain materials into the environment.



1.3 Premises operation

1.3.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit in this section.

1.3.2 The Licensee shall only allow waste to be accepted on to the Premises if:

- (a) it is of a type listed in Table 1.3.1; and
- (b) the quantity accepted is below any limit listed in Table 1.3.1; and
- (c) it meets any specification listed in Table 1.3.1

Table 1.3.1: Waste acceptance			
Waste type	Waste Code	Quantity limit	Specification¹
Sewage	N/A	20,000 tonnes per annual period	Liquid waste receipt in tankers. Discharged to primary treatment pond
Septage wastes (Sewage) – domestic wastes from apparatus for the treatment of sewage	K210		
Waste from grease traps	K110		
Processed RAP	N/A	20,000 tonnes per annual period	The Licensee shall ensure that Processed RAP does not contain any of the following materials: <ul style="list-style-type: none"> • granular pavement materials, clay, soil or organic matter; • bricks, concrete, glass or building materials; or • laterite asphalt, tar based products, geotextile fabrics, raised pavement markers or surface treatments such as high friction surfacings or green or red pavement markings.

Note 1: Additional requirements for the acceptance of controlled waste are set out in the *Environmental Protection (Controlled Waste) Regulations 2004*.

1.3.3 The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the processes set out in Table 1.3.2 and in accordance with any process requirements described in that table.

1.3.4 The Licensee shall ensure that waste material is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.3.

1.3.5 The Licensee shall manage all wastewater treatment, receiving, facultative and storage evaporation ponds such that:

- (a) overtopping of the ponds does not occur; and
- (b) a freeboard equal to, or greater than, 500mm is maintained;
- (c) the integrity of the containment infrastructure is maintained;
- (d) trapped overflows are maintained on the outlet of ponds to prevent carry-over of surface floating matter; and
- (e) vegetation is prevented from encroaching onto pond surfaces or inner pond embankments.

1.3.6 The licensee shall ensure that automatic safeguards are incorporated within the asphalt manufacturing process to prevent the ignition of bitumen within the drum.



1.3.7 The Licensee shall ensure that:

- (a) the baghouse is operational prior to start-up of the drier and operated continuously whilst the drier is operating;
- (b) the baghouse filters are regularly inspected; and
- (c) when detected, blocked, frayed or leaking, baghouse filters are immediately replaced.

1.3.8 The Licensee shall ensure that bulk materials are stored in a manner which minimises the generation of airborne dust.

Table 1.3.2: Waste processing		
Waste type	Process	Process limits
Sewage		Primary treatment (Pond 1 and 2): <ul style="list-style-type: none"> - Water depth to sludge shall be greater than 0.4 m or equivalent and sludge depth on ponds to be less than 1m or equivalent; - pH of wastewater to be maintained at 6.5 to 9; and - Scum/rags to have less than 5% coverage across pond surfaces.
Septage wastes (Sewage) – domestic wastes from apparatus for the treatment of sewage		
Waste from grease traps	Receipt in tankers; Physical, biological and chemical treatment	Secondary treatment (Pond 3 and 4): <ul style="list-style-type: none"> - Water depth to sludge shall be greater than 0.4 m or equivalent and sludge depth on ponds to be less than 1m or equivalent; - pH of wastewater to be maintained at 6.5 to 9; Treatment of waste shall be at or below the treatment capacity of 20,000 tonnes per annual period.
Sewage sludge resulting from onsite liquid waste treatment	Drying out of ponds; Storage prior to landfill disposal	300 m ³ at any one time prior to landfill disposal off-site.
Processed RAP	Asphalt manufacturing	500 tonnes at any time

Table 1.3.3: Containment infrastructure		
Vessel or compound	Material	Requirements
Receiving pit	Wastewater	Impermeable receptacle or storage chamber.
Pond 1 (receiving anaerobic pond)	Wastewater	Lined with a geosynthetic clay liner in accordance with WQPN 27.
Pond 2 (receiving anaerobic pond)	Wastewater	Lined with a geosynthetic clay liner in accordance with WQPN 27.
Pond 3 (facultative aerobic pond)	Treated wastewater	Lined with a geosynthetic clay liner in accordance with WQPN 26.
Pond 4 (evaporation pond)	Treated wastewater	Lined in accordance WQPN 27 with a synthetic membrane.
Sewage sludge compound	Sewage sludge	Temporary or permanent infrastructure to consist of a bunded hardstand or lined area (lined to achieve a permeability of less than 10 ⁻⁹ m/s or equivalent), capable of preventing surface run-off of leachate and sludge and which includes a leachate collection system



2 Emissions

2.1 General

2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit specified in any part of section 2 of this Licence.

2.2 Point source emissions to air

2.2.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emission points to air

Emission point reference	Emission Point	Emission point height (m)	Source, including any abatement
A1	Asphalt Plant Stack	6	Drum drier via baghouse

2.2.2 The Licensee shall not cause or allow point source emissions to air greater than the limits listed in Table 2.2.2.

Table 2.2.2: Point source emission limits to air

Emission point Reference	Parameter	Limit (including units) ^{1,2}	Averaging period
A1	PM	50 mg/m ³	Stack Test (Minimum 60 minute tests)

Note 1: All units are referenced to STP dry

Note 2: Concentration units are referenced to 17% O₂

3 Monitoring

3.1 General monitoring

3.1.1 The Licensee shall ensure that:

- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1 unless otherwise indicated in the relevant table;
- (b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and
- (c) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured unless indicated otherwise in the relevant table.

3.1.2 The Licensee shall ensure that:

- (a) six monthly monitoring is undertaken at least 5 months apart; and
- (b) annual monitoring is undertaken at least 9 months apart.

3.1.3 The Licensee shall record production or throughput data and any other process parameters relevant to any non-continuous monitoring undertaken.

3.1.4 The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.

3.1.5 The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the



attention of the CEO accompanied with a report comprising details of any modifications to the methods.

3.2 Monitoring of point source emissions to air

3.2.1 The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.

Table 3.2.1: Monitoring of point source emissions to air					
Emission point reference	Parameter	Units^{1,3}	Averaging period	Frequency²	Method
A1	Volumetric flow rate	m ³ /s	n/a	Annual	USEPA Method 2
	PM	mg/m ³ g/s	60 minute minimum		USEPA Method 5 or 17
	Sulfur dioxide		30 minute minimum		USEPA Method 6C
	Nitrogen oxides				USEPA Method 7E
	Carbon monoxide				USEPA Method 10
	Total Volatile Organic Compounds (TOC)				USEPA Method 18

Note 1: All concentration units are referenced to STP dry

Note 2: Monitoring shall be undertaken to reflect normal operating conditions and any limits or conditions on inputs or production.

Note 3: Concentration units are referenced to 17% O₂

3.2.2 The Licensee shall ensure that sampling required under condition 3.2.1 of the Licence is undertaken at sampling locations in accordance with the AS 4323.1.

3.2.3 The Licensee shall ensure that all non-continuous sampling and analysis undertaken pursuant to condition 3.2.1 is undertaken by a holder of NATA accreditation for the relevant methods of sampling and analysis.

3.3 Monitoring of inputs and outputs

3.3.1 The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.

Table 3.3.1: Monitoring of inputs and outputs					
Input/Output	Monitoring point reference	Parameter	Units	Averaging period	Frequency
Waste Inputs	None specified	Waste received	tonnes	N/A	Each load arriving at the Premises



3.4 Ambient environmental quality monitoring

3.4.1 The Licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table.

Table 3.4.1: Monitoring of ambient groundwater quality				
Monitoring point reference and location as shown on Map of monitoring locations and premises infrastructure in Schedule 1	Parameter	Units	Averaging period	Frequency
MB1 and MB2	pH ¹	pH units	Spot sample	Six monthly
	Electrical conductivity ¹	µS/cm		
	Standing Water Level (SWL)	m AHD		
	Total Phosphorus	mg/L		
	Total Nitrogen	mg/L		

Note 1: In-field non-NATA accredited analysis permitted.

4 Improvements

4.1 Improvement program

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

Table 4.1.1: Improvement program		
Improvement reference	Improvement	Date of completion
IR1	The Licensee shall ensure that the first annual monitoring specified in condition 3.2.1 (Table 3.2.1) is carried out by 30 September 2015 and a report provided to the CEO.	3 October 2015

5 Information

5.1 Records

5.1.1 All information and records required by the Licence shall:

- (a) be legible;
- (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- (c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or waters.

5.1.2 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.



- 5.1.3 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.
- 5.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

5.2 Reporting

- 5.2.1 The Licensee shall submit to the CEO an Annual Environmental Report by 31 March in each year 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.

Table 5.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form¹
-	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	Summary of any treatment capacity exceedances and any action taken.	None specified
1.3.5	Summary of any freeboard exceedances and any action taken.	None specified
Table 2.2.2	Limit exceedances	AACR
Table 3.2.1	Volumetric flow rate, particulate matter, sulfur dioxide, nitrogen oxides, volatile organic compounds, and carbon monoxide	None specified
Table 3.3.1	Total waste received	None specified
3.4.1	Monitoring of ambient groundwater quality	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

- 5.2.2 The Licensee shall ensure that the Annual Environmental Report also contains:
- (a) any relevant process, production or operational data recorded under condition 3.1.3; and
 - (b) an assessment of the information contained within the report against previous monitoring results and Licence limits.
- 5.2.3 The Licensee shall submit the information in Table 5.2.2 to the CEO at the Contact Address according to the specifications in that table.

Table 5.2.2: Non-annual reporting requirements				
Condition or table (if relevant)	Parameter	Reporting period	Reporting date (after end of the reporting period)	Format or form¹
-	Copies of original monitoring reports submitted to the Licensee by third parties	Not Applicable	Within 14 days of the CEO's request	As received by the Licensee from third parties

Note 1: Forms are in Schedule 2



5.3 Notification

5.3.1 The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the CEO and in accordance with the notification requirements of the table.

Table 5.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
-	Removal of sewage sludge from a treatment pond, wastewater treatment vessel, sewage sludge storage pond or Geobag	No less than 14 days in advance of works	None specified
1.3.1 and 2.1.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5pm of the next working day Part B: As soon as practicable	N1
3.1.5	Calibration report	As soon as practicable.	None specified

Note 1: No notification requirement in the Licence shall negate the requirement to comply with s72 of the Act.

Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

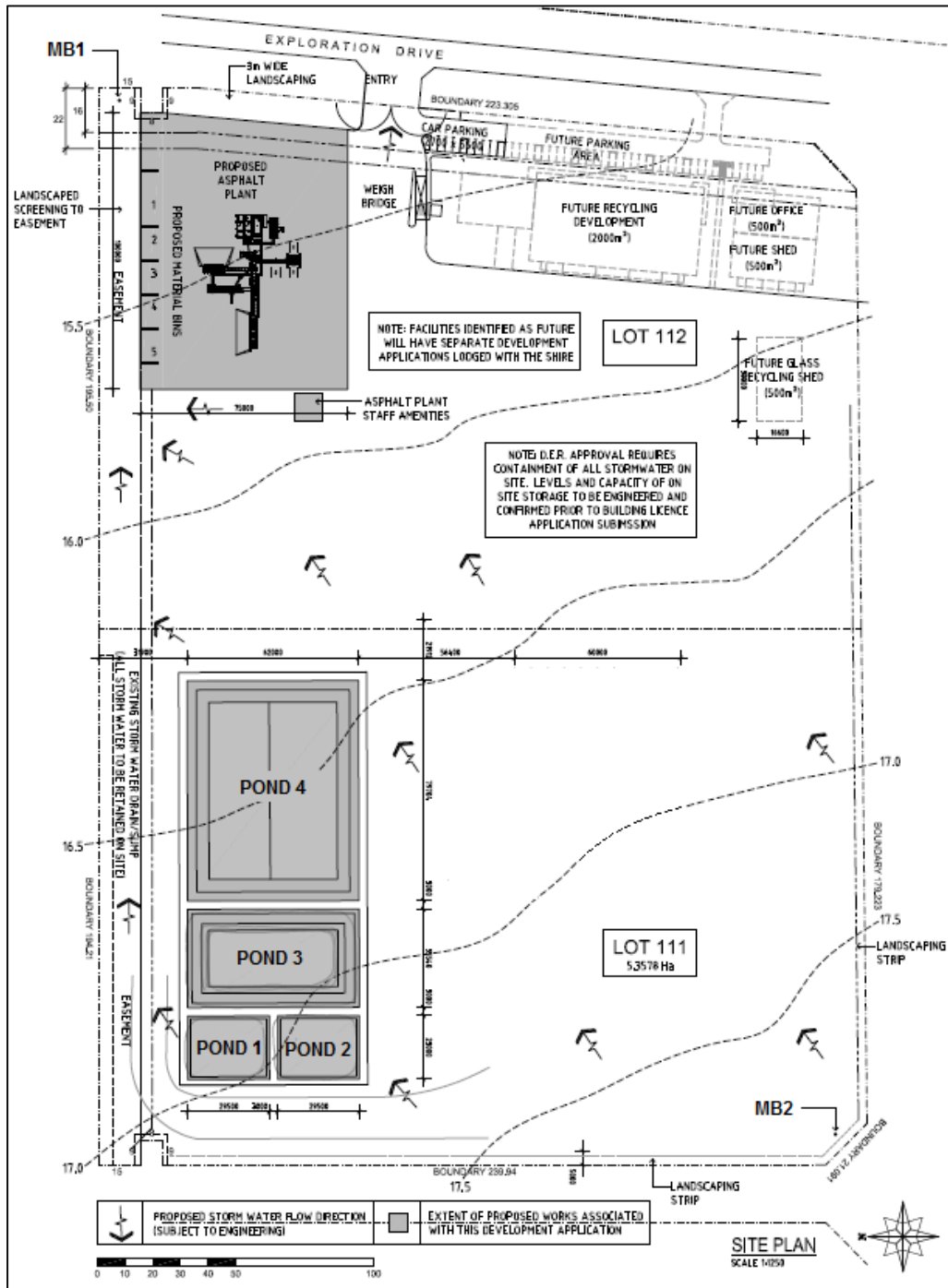
The Premises is shown in the maps below. The red line depicts the Premises boundary.





Map of monitoring locations and premises infrastructure

The locations of the monitoring points defined in Table 3.8.1 are shown below.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name:	ABN:
Trading as:	
Reporting period: _____ to _____	

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 C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) must 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.

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)



Licence: L8861/2014/1
 Form: N1

Licensee: Karratha Recycling Pty Ltd
 Date of breach:

Notification of detection of the breach of a limit

These pages outline the information that the operator must provide. Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit

Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of Karratha Recycling Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: **Karratha Recycling Pty Ltd**

Licence: **L8861/2014/1**

Registered office: Lakeside Corporate
Unit 16, 24 Parkland Road
OSBORNE PARK WA 6017

ACN: 163 991 106

Premises address: Karratha Recycling Liquid Waste Facility
Lot 111 and 112 Exploration Drive
GAP RIDGE WA 6714
As depicted in Schedule 1

Issue date: Thursday, 29 January 2015

Commencement date: Monday, 2 February 2015

Expiry date: Saturday, 1 February 2020

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue an amended Licence. DER considers that in reaching this decision, it has taken into account all relevant considerations and legal requirements and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by:

Chris Slavin
Licensing Officer

Decision Document authorised by:

Jonathan Bailes
Manager Licensing



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4 Decision table	5
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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	35	40,000 tonnes per annual period
	61	20,000 tonnes per annual period
	61A	20,000 tonnes per annual period
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Compliance Certificate received	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		



3 Executive summary of proposal and assessment

The Karratha Recycling Liquid Waste Facility is located within the City of Karratha at the Gap Ridge Industrial Estate approximately 12 kilometres (km) from Karratha and 9.2 km from Dampier.

This partial Decision Document relates to the licence amendment for the inclusion of categories 35 (Asphalt manufacturing) and 61A to the Karratha Recycling Liquid Waste Facility Licence L8861/2014/1. Only the emissions and discharges associated with the Asphalt plant have been assessed.

Works Approval W5579/2014/1 issued to Karratha Asphalt Pty Ltd (Karratha Asphalt) for the construction of the asphalt plant has been completed and a compliance certificate dated 19 September 2014 was submitted to DER. Karratha Asphalt will operate the asphalt plant under the current licence issued to Karratha Recycling. Karratha Asphalt has signed a lease agreement with Karratha Recycling to operate the Asphalt Plant on Lot 112 Exploration Drive. Karratha Recycling and Karratha Asphalt both have common directors.

The Asphalt plant is an Almix 60UFK – skid mounted uniflow series and has a design production capacity of 100 tonnes per hour under ideal conditions. The asphalt plant will be fed by a front end loader from ground bunkers (sand and aggregates) into cold feed bins. Each cold feed bin has a variable speed feed belt drive allowing the required mix proportions to be set by the operator. The combined raw material feed is transported by conveyor belt to the dryer/mixer drum. The dryer/mixer combines the functions of a dryer and a continuous mixer in one system. The aggregate and sand is dried in the inner drum and after mixing the addition of bitumen, filler and RAP takes place after the recycle collar on the drum. When the mix is discharged from the mixer it is transported by a slat conveyor system to the hotmix storage silos.

The main potential emissions from the site associated with the asphalt plant are emissions to air from the baghouse of the asphalt plant, the most significant of these are particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NO_x), Volatile Organic Compounds (VOCs), and sulfur dioxide (SO₂). Other potential emissions include discharges of wastewater to land (and potentially to groundwater) and fugitive emissions in the form of odour. A commissioning report was submitted on 27 March 2015; however, stack testing for air emissions needs to be undertaken again for verification purposes and an improvement condition has been included in the amended licence requiring this.

The closest sensitive receptor is an accommodation village located 2 km away. The town of Baynton West is 2.5 km away. According to the City of Karratha zoning classifications, the site is located within an area classified as 'noxious'.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.5 L1.3.2 L1.3.3	<p><u>Emission Description</u> <i>Emission:</i> Stormwater contaminated with Reclaimed Asphalt Pavement (RAP) stored onsite for asphalt manufacturing operations. <i>Impact:</i> Contamination of surrounding land and surface water drainage systems. Potential impacts on ecology of surface water from the addition of RAP constituents in the water. <i>Controls:</i> Karratha Recycling will ensure that RAP is maintained in a separate stockpile prior to use in asphalt manufacturing and a maximum 500 tonnes of RAP will be stored on site at any time.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.2.5 has been added to the Licence to ensure all stormwater is prevented from being contaminated by activities onsite and that contaminated or potentially contaminated stormwater is treated as necessary prior to being discharged from the Premises. Condition 1.3.2 imposes a specification for the RAP including the requirement to exclude materials that cannot be reprocessed. Condition 1.3.3 (Table 1.3.2) limits the amount of RAP that can be stored on site at any time to 500 tonnes.</p>	<p>General Provisions of the <i>Environmental Protection Act 1986</i>.</p> <p>Clause 511.09.01 Main Roads Specification 511 - Materials For Bituminous Treatments</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	
Premises Operation	L1.3.2	Condition 1.3.2 has been updated to include the acceptance of processed Reclaimed Asphalt Pavement (RAP) which is brought to site from Karratha Environmental Crushing's waste recycling facility, which screens and sorts the RAP.	General Provisions of the <i>Environmental Protection Act 1986</i> .
Emissions to air including monitoring	L1.3.7 L2.2.1 – L2.2.2 L3.2.1 – L3.2.3 L4.1.1	<p><u>Emission Description</u> <i>Emission:</i> Combustion gases (NO_x, SO₂, CO and PM) emitted from asphalt plant into the atmosphere. <i>Impact:</i> Reduced local air quality. The premises is located within the Gap Ridge industrial estate and is zoned 'noxious' by the City of Karratha's town planning scheme. The closest sensitive receptor is an accommodation village located 2 km away. The town of Baynton West is 2.5 km away. Point source air emissions during operations will result from combustion process in the dryer. Of these, PM is most significant. The asphalt plant is expected to operate 8 hours per day at a rate of 60 tonnes per hour, with an annual throughput up to 40 000 tonnes per year. It is a new plant and expected to meet appropriate emission standards. An initial emissions verification test conducted at the premises confirmed emissions were consistent with those assessed in the Works Approval. <i>Controls:</i> Exhaust air from the dryer/mixer is treated in a fabric filter (baghouse) to remove particulates. It is capable of removing 99.9% of particulate emissions from the process air stream. Air exhaust will then be discharged to the atmosphere via a 6m tall stack. Monitoring systems are in place to ensure effective baghouse operation. The manufacturer's specifications indicate that the stack velocity will be sufficient to ensure adequate dispersion of the emission (18m/s).</p>	<p>General Provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><i>Protection of the Environment Operations (Clean Air) Regulation 2010</i>.</p> <p>Environmental</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u></p> <p>Condition 1.3.7 has been added to the licence to ensure:</p> <ul style="list-style-type: none"> The baghouse is operational prior to start up and is operated whilst the dryer is operating. The Asphalt Plant's bag filter is fitted with interlocks to ensure the bag filter is started prior to the burner being activated. If the exhaust gases are not removed the burner will not operate; and The baghouse is regularly inspected and when detected, blocked, frayed or leaking baghouse filters are found they are immediately replaced. Karratha Recycling have outlined that visual inspections of the exhaust stack is carried out at all times. <p>Condition 2.2.1 has been added to the Licence to ensure that that the emissions only occur from the 6 m tall stack of the asphalt plant via the baghouse to significantly reduce particulate matter discharged into the atmosphere.</p> <p>Condition 2.2.2 - A stack emission limit for particulates has been set in line with the values specified for Group 4 installations under the New South Wales <i>Protection of the Environment Operations (Clean Air) Regulation 2010</i>. The NSW Regulations 2010 specify a particulate emission limit of 50 mg/m³ for new installations. As such, the limit of 50 mg/m³ for particulates has been added to this Licence. Improvement condition NSC 4.1.1 has been included to verify emission parameters due to concerns over the methodology used during the verification testing.</p>	<p>Guidelines on Best Available Techniques (BAT) for the Production of Asphalt Paving Mixes, European Asphalt Pavement Association.</p> <p>Continuous Emission Monitoring System (CEMS) Code for Stationary Source Air Emissions, Department of Environment & Conservation, Government of Western Australia</p> <p>Australian Standard AS4323.1 Stationary Source Emissions Method 1: Selection of sampling positions</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>Condition 3.2.1 has been added to the Licence to ensure the monitoring of stack exhaust velocity, PM, CO, NO_x, VOC and SO₂. These parameters are to be sampled in line with the relevant Australian Standards and USEPA Methods.</p> <p>Condition 3.2.2 has been added to the Licence to ensure sampling is undertaken at the sampling location in accordance with the AS 4323.1.</p> <p>Condition 3.2.3 has been added to the licence to ensure that all non-continuous sampling and analysis undertaken pursuant to condition 3.2.3 is undertaken by a holder of NATA accreditation for the relevant methods of sampling and analysis.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
Fugitive Emissions	L1.3.8	<p><u>Emission Description</u> <i>Emission:</i> Dust emissions during operations from raw material stockpiles handling of aggregates and vehicle movement. <i>Impact:</i> Reduced local air quality. The asphalt plant is expected to operate 8 hours per day at a rate of 60 tonnes per hour, with an annual throughput up to 40 000 tonnes per year. The closest sensitive receptor is an accommodation village located 2 km away. The town of Baynton West is 2.5 km away. <i>Controls:</i> Karratha Recycling have committed to take the following measures for controlling fugitive dust:</p> <ul style="list-style-type: none"> • Wind shields on cold feed bins to minimise dust emissions during loading of sand and aggregates into the cold feed bins; • Baghouse dust collection system and reuse of captured dust as filler material in the asphalt mix; • Filter, high level alarm and auto shutoff system on imported filler silo 	<p>General Provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<ul style="list-style-type: none"> All trucks transporting sand and aggregates to the plants to cover loads with tarpaulins; Asphalt sealing of site entrance and exit gate area and partial sealing of site exit road; and The use of a water cart or water sprinklers for suppression of fugitive dust emissions as required <p><u>Risk Assessment</u> Consequence: Minor Likelihood: Unlikely Risk Rating: Moderate</p> <p><u>Regulatory Controls</u> Condition 1.3.8 has been added to the licence to ensure that bulk materials are stored in a manner, which minimises the generation of airborne dust. The general provisions of the <i>Environmental Protection Act 1986</i> and <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> apply.</p> <p><u>Residual Risk</u> Consequence: Minor Likelihood: Unlikely Risk Rating: Moderate</p>	
Odour	L1.3.6	<p><u>Emission Description</u> <i>Emission:</i> In the process of mixing hot bitumen with hot aggregate, bitumen is partially volatilised and creates a characteristic odour due to VOCs. The mixing of reclaimed asphalt (RAP) in the pug mill with super-heated virgin material may produce odour. <i>Impacts:</i> Negative impacts on health, welfare, comfort or amenity of nearby residents or persons. The closest sensitive receptor is an accommodation village located 2 km away. The town of Baynton West is 2.5 km away.</p>	General Provisions of the <i>Environmental Protection Act 1986</i> .



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Controls:</i> Karratha Recycling have committed to take the following measures for controlling odour:</p> <ul style="list-style-type: none"> • Hot oil heating system for kettles are set on minimum practical operational temperatures for normal process requirements; • Over temperature alarms are installed on the drum dryer and auto shut off systems for the hot oil system; • Water bubblers are installed on bitumen kettle breather pipes; • Gaskets are installed on kettle hatches; • Hinged flaps are installed on kettle over flow outlet to prevent emissions; • Enclosed slat conveyor; • Enclosed hotmix storage silos; and • All trucks carrying hotmix asphalt are covered by tarpaulins. <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.3.6 has been added to the licence to ensure the Plant has automatic safeguards to prevent the ignition of bitumen within the drum and prevent potential odour being released. The general provisions of <i>the Environmental Protection Act 1986</i> apply. The previous generic odour condition has been removed as the risk of odour from the wastewater treatment plant was rated a low in the previous assessment.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Monitoring General	3.1.3	Condition 3.1.3 has been added on the licence to ensure the licensee records production or throughput data and any other process parameters relevant to any non-continuous monitoring.	
Improvements	4.1.1, 4.1.2	Works Approval W5579/2014/1 was issued to Karratha Asphalt. As a condition of the Works Approval, Karratha Asphalt was required to submit a stack test report, which formed part of the commissioning of the Asphalt Plant. The stack test was submitted to DER on 20 February 2015. However the stack test was not conducted as per condition 3.1.1 of the Works Approval in that the USEPA methods for the parameters were not adhered to. As a condition of the amended Licence, OSC 4.1.1 has been added to the Licence to ensure Karratha Recycling conducts another stack test by 30 August 2015. The additional stack test will be used to demonstrate that the results of the verification testing carried out are reliable.	Works Approval W5579/2014/1
Licence Duration	N/A	The first Licence was issued to Karratha Recycling for a Liquid Waste Facility on 29 January 2015 for a 5 year period. The duration of the licence has not been reviewed as part of this amendment.	

5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
25/06/2015	Proponent sent a copy of draft instrument	Comments received regarding: a. storage of the RAP; b. monitoring of stack velocity; and c. completion dates for Improvement Requirement IR1.	a. Maximum storage quantity of RAP included on the licence. b. Continuous monitoring and limit for stack velocity removed. c. Date for sampling completion amended to September 2015.



6. Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High