



Licence

Environmental Protection Act 1986, Part V

Licensee: THE DOBBIE DICO METER COMPANY (W.A.)
PTY LIMITED

Licence: L8396/2009/3

Registered office: 430 Victoria Road
MALAGA WA 6090

ACN: 008 671 332

Premises address: Dobbie
430 Victoria Road
MALAGA WA 6090
Being Lot 307 on Plan 3107 as depicted in Schedule 1.

Issue date: Friday, 25 September 2015

Commencement date: Wednesday, 30 September 2015

Expiry date: Saturday, 29 September 2035

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 |
|-----------------|--|--|---|
| 45 | Metal Melting or Casting: premises on which metal or scrap metal is melted in furnaces or cast | 100 tonnes or more per year | 750 tonnes per annual period |

Conditions

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

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Lauren Trott

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 Dobbie Dico Meter Company (W.A.) Pty Limited is located within the City of Swan, around 21 kilometres (km) north east of the Perth Central Business District. It is situated in the Malaga Industrial Area. Directly surrounding the premises are other industrial premises with residential areas to North, East and South at about 1km from the premises.

The activities at the premises include melting and pouring of molten Carbon or Mild steel 250 grade into synthetic resin moulds. Scrap metal is accepted from local scrap metal yards with stringent specifications on the types of materials that can be received and removal of non-conforming wastes. Scrap metal loads are inspected to ensure conformance with site specifications and entire loads are rejected and returned to the supplier if any evidence of cross-contamination is identified. The conforming scrap metal is then melted in a small electric induction furnace. Molten it is poured into resin moulds that are manufactured on site and the moulds stay in place until the cast has hardened and sufficiently cooled. It is then transported with overhead cranes to an area where the mould is removed from the cast. Some products are then blasted in the steel grit chamber before final finishing occurs with fretting. The product is then ready for the customer and is either stored or delivered to the customer. The product range includes fittings and valves for civil waterworks and specialty castings for the rail and resource sector.

The primary environmental issues associated with the facility relate to air quality and include dust, and fumes during pouring/cooling. Dust emissions are managed through the use of a number of extraction systems that feed into bag houses. The production area is within a large shed, which has several door openings. Fumes from the pouring and cooling process are not extracted and disperse within the shed or escape through the open doors. Dust from the abrasive blasting, fretting and mechanical mould removal is extracted to bag filters. An extraction hood is also available for the furnace but is not utilised at all times due to the scrap specifications which do not cause dust emissions from the melting process. Fumes from the furnace or the cooling area are not treated, but are only released inside the building and are normally not actively extracted. The storage of chemical products used in the manufacture of moulds is outside near the stormwater drains, therefore there are risks to groundwater via these stormwater drains in the event of spills or leaks.

This Licence is the successor to licence L8396/2009/2 and includes a conversion to the latest licence template.

The licences and works approvals issued for the Premises:

| Instrument log | | |
|----------------|------------|------------------|
| Instrument | Issued | Description |
| L8396/2009/1 | 29/04/2010 | New licence |
| L8396/2009/2 | 24/09/2010 | Licence re-issue |
| L8396/2009/3 | 25/09/2015 | Licence re-issue |

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 July until 30 June in the following year;

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

'CEO' for the purpose of correspondence means:

Chief Executive Officer

Department Administering the *Environmental Protection Act 1986*

Locked Bag 33

CLOISTERS SQUARE WA 6850

Email: info@der.wa.gov.au

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

'hardstand' means a surface with a permeability of 10^{-9} metres/second or less;

'Licence' means this Licence numbered L8396/2009/3 and issued under the Act;

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

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

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

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

'usual working day' means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the 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 version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline 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.

2 Emissions

2.1 Point source emissions to air

- 2.1.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.1.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this Licence.

| Table 2.1.1: Emission points to air | | | |
|--|---|-------------------------|--|
| Emission point reference | Emission point reference on Map of emission points | Emission Point | Source, including any abatement |
| A1 | 1 | Baghouse filter exhaust | Shot blast chamber and fretting area emissions via baghouse filter |
| A2 | 2 | Baghouse filter exhaust | Steel grit recycling cyclone via baghouse filter |
| A3 | 3 | Baghouse filter exhaust | Fumes and dust from electric induction furnace via baghouse filter |

3 Improvements

3.1 Improvement program

- 3.1.1 The Licensee shall complete the improvements in Table 3.1.1 by the date of completion in Table 3.1.1.

| Table 3.1.1: Improvement program | | |
|---|---|---------------------------|
| Improvement reference | Improvement | Date of completion |
| IR1 | The Licensee shall submit to the CEO a report on all existing chemical storage areas identifying whether these are capable of ensuring that any spills from the tanks, drums or Intermediate Bulk Containers are captured without causing a discharge to any of the soakwells within the premises (secondary bunding sufficient). The report will include a list of actions for each non-compliant tank/drum or Intermediate Bulk Containers required to reduce the risk of a discharge to any onsite soakwell including timeframes for implementation. | 01/12/15 |



4 Information

4.1 Records

- 4.1.1 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 4.1.1(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.
- 4.1.2 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.
- 4.1.3 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.
- 4.1.4 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.

4.2 Reporting

- 4.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 28 calendar days after the end of the annual period. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

| Table 4.2.1: 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 |
| 4.1.3 | Compliance | Annual Audit Compliance Report (AACR) |
| 4.1.4 | Complaints summary | None specified |

Note 1: Forms are in Schedule 2



Schedule 1: Maps

Premises map with emission points marked

The Premises is shown in the map below. The pink line depicts the Premises boundary. The locations of the emission points as defined in Table 2.1.1 are shown on the map.





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

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)





Decision Document

Environmental Protection Act 1986, Part V

**Licensee: THE DOBBIE DICO METER COMPANY (W.A.)
PTY LIMITED**

Licence: L8396/2009/3

Registered office: 430 Victoria Road
MALAGA WA 6090

ACN: 008 671 332

Premises address: The Dobbie Dico Meter Company (WA) Pty Ltd
430 Victoria Road
MALAGA WA 6090
Being Lot 307 on Plan 3107 as depicted in Schedule 1.

Issue date: 25 September 2015

Commencement date: Wednesday, 30 September 2015

Expiry date: Saturday, 29 September 2035

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by:

Peter Knol
Senior Licensing Officer

Decision Document authorised by:

Lauren Trott
Delegated Officer



Contents

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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 checked="" type="checkbox"/> | |
| | Licence amendment <input type="checkbox"/> | |
| | Works Approval amendment <input type="checkbox"/> | |
| Activities that cause the premises to become prescribed premises | Category number(s) | Assessed design capacity |
| | 45 Metal Melting or Casting | 750 tonnes per annual period |
| Application verified | Date: 01/07/2015 | |
| Application fee paid | Date: 09/07/2015 | |
| Works Approval has been complied with | Yes <input type="checkbox"/> | No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| Compliance Certificate received | Yes <input 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 | | |
| 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"/> |
| Is the proposal subject to Ministerial Conditions? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| | | |
| 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"/> |
| | | |
| 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 Dobbie Dico Meter Company (W.A.) Pty Limited is located within the City of Swan, around 21 kilometres (km) north east of the Perth Central Business District. It is situated in the Malaga Industrial Area. Directly surrounding the premises are other industrial premises with residential areas to North, East and South at about 1km from the premises.

The activities at the premises include melting and pouring of molten Carbon or Mild steel 250 grade into synthetic resin moulds. Scrap metal is accepted from local scrap metal yards with stringent specifications on the types of materials that can be received and removal of non-conforming wastes. Scrap metal loads are inspected to ensure conformance with site specifications and entire loads are rejected and returned to the supplier if any evidence of cross-contamination is identified. The conforming scrap metal is then melted in a small electric induction furnace. Molten it is poured into resin moulds that are manufactured on site and the moulds stay in place until the cast has hardened and sufficiently cooled. It is then transported with overhead cranes to an area where the mould is removed from the cast. Some products are then blasted in the steel grit chamber before final finishing occurs with fretting. The product is then ready for the customer and is either stored or delivered to the customer.

The product range includes fittings and valves for civil waterworks and specialty castings for the rail and resource sector.

The primary environmental issues associated with the facility relate to air quality and include dust, and fumes during pouring/cooling. Dust emissions are managed through the use of a number of extraction systems that feed into bag houses. The production area is within a large shed, which has several door openings. Fumes from the pouring and cooling process are not extracted and disperse within the shed or escape through the open doors. Dust from the abrasive blasting, fretting and mechanical mould removal is extracted to bag filters. An extraction hood is also available for the furnace but is not utilised at all times due to the scrap specifications which do not cause dust emissions from the melting process. Fumes from the furnace or the cooling area are not treated, but are only released inside the building and are normally not actively extracted. The storage of chemical products used in the manufacture of moulds is outside near the stormwater drains, therefore there are risks to groundwater via these stormwater drains in the event of spills or leaks.

This Licence is the successor to licence L8396/2009/2 and includes a conversion to the latest licence template.

The licences and works approvals issued for the Premises:

| Instrument log | | |
|-----------------------|---------------|--------------------|
| Instrument | Issued | Description |
| L8396/2009/1 | 29/04/2010 | New licence |
| L8396/2009/2 | 24/09/2010 | Licence re-issue |
| L8396/2009/3 | 25/09/2015 | Licence re-issue |



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 | - | <p>In the previous licence, some conditions were related to burning of scrap cable or motor windings and the acceptance of only clean scrap metal (defined as metal which is generally free from adherent paint, rubber and plastic material and comprises not more than 1.5 percent by weight of organic material). These conditions have been deemed not relevant to be included anymore. Due to the high quality standard and steel scrap specifications that is being used, all non conforming materials are returned to the scrap metal yard. There is no burning of any products occurring on site (other than melting of scrap metal). The furnace is an induction furnace and as such the previous condition regarding the use of gas, diesel or low sulphur fuel is also no longer required. (Conditions A1 to A3 of previous licence).</p> <p>Condition 1.2.1 covers previous licence condition A4.</p> <p>Condition A5 is covered by Section 49 of the <i>Environmental Protection Act 1986</i> and besides this all activities occur inside the building with the grounds surrounding the building covered with bitumen. Condition A6 of the previous licence relates to housekeeping. This condition is not included in this licence as it is a management condition. The removal of these two conditions have been risk assessed below.</p> | <p>Application supporting documentation</p> <p><u>General Provisions of the Environmental Protection Act 1986</u></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>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Fugitive dust from the premises. <i>Impact:</i> Reduced local air quality, dust on neighbouring property causing a nuisance or reduced amenity. <i>Controls:</i> The site is fully hard stand and most activities occur within the buildings.</p> <p><u>Risk Assessment normal operation:</u> <i>Consequence:</i> Insignificant. <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Section 49 of the <i>Environmental Protection Act 1986</i> is sufficiently covering this aspect.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Residual Risk Rating:</i> Low</p> <p>Conditions W1(a) and W1(b) have not been copied across to the new licence conditions. Based upon visual observations during the site visit, the storage of chemicals needs reassessment and as such this has been assessed under the improvement condition section.</p> | |
| Premises operation | - | No specific conditions are required to be included in this licence for the premises operation. | |
| Emissions general | - | As no limits will be set for emissions, no general conditions will be required. | N/A |



| DECISION TABLE | | | |
|--|--|---|---|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Point source emissions to air including monitoring | L1.2.1 L2.1 | <p>Normal Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Dust particles from fretting, abrasive blasting and mould removal. <u>Two of these bag filters are located outside against the building in the middle of the premises and one on the other side of the same building but closer to a neighboring industrial premises. One of the bag filters, for the unmoulding process, is located within the building. When bag filters operate normally there should not be any visible emissions from these bag filters.</u></p> <p><i>Impact:</i> Reduced local air quality, dust on neighbouring property causing a nuisance or reduced amenity.</p> <p><i>Controls:</i> All potential sources for dust emissions have dust extraction systems with bag filters. <u>There is a maintenance procedure for the bag filters, with regular inspections of the bag filter.</u></p> <p><u>Risk Assessment normal operation:</u> <i>Consequence:</i> Insignificant. <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The bag filters are the most appropriate pollution control equipment for the dust emissions. Condition 1.2.1 requires the equipment including emissions control measures to be maintained on a regular basis. If Licensee complies with this, then dust emissions from point sources are not expected to be an issue. Thus no further conditions would be required for control of dust emissions from the premises.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely</p> | <p>Ambient Air Assessment Criteria, National Environmental Protection Measure</p> <p>Application supporting documentation</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><i>Residual Risk Rating:</i> Low</p> <p><u>Emission Description</u> <i>Emission:</i> When a bag is breaking/tearing within the bag filter, increased dust is emitted from the bag filters. This can become visible. <i>Impact:</i> Reduced local air quality, dust on neighbouring property causing a nuisance or reduced amenity. <i>Controls:</i> Regular maintenance and inspections normally will pick up bag wear and these bags can then be replaced. Also the main bag filter does have a pressure differential monitor and staff can check this gauge to see if the bag filter is operating properly. Furthermore the location of the main bag filter and the bag filter for the recycling of the grit, is such that staff regularly walk past and any bag breakage could easily be picked up like that.</p> <p><u>Risk Assessment abnormal operation</u> <i>Consequence:</i> Minor. <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Due to the location and the height of the exhausts from the bagfilters, any bag breakage will most likely result in a very localised increase of dust from the exhaust, which would be visible to staff in the area. The company has a maintenance contract and is able to repair the broken bag at short notice. Condition 1.2.1 will cover this kind of event sufficiently in this case.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Residual Risk Rating:</i> Moderate</p> | |



| DECISION TABLE | | | |
|---|---|---|---|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Point source emissions to surface water including monitoring | - | There are no point source emissions to surface water from the premises. | |
| Point source emissions to groundwater including monitoring | - | There are no point source emissions to groundwater from the premises | |
| Emissions to land including monitoring | - | There are no emissions to land from the premises. | |
| Fugitive emissions | - | There were no fugitive dust conditions on the previous licence and fugitive emissions have not been reassessed as part of this licence renewal. There are no conditions relating to fugitive emissions on this licence. | |
| Odour | - | There were no odour conditions on the previous licence and odour has not been reassessed as part of this licence renewal. There are no conditions relating to odour on this licence. | |
| Noise | - | There were no noise conditions on the previous licence and noise has not been reassessed as part of this licence renewal. There are no conditions relating to noise on this licence. The licensee is required to comply with the <i>Environmental Protection (Noise) Regulations 1997</i> . | <i>Environmental Protection (Noise) Regulations 1997.</i> |
| Monitoring general | - | There are no monitoring requirements included in the licence conditions as there are no limits included in the licence. The risk of unacceptable emissions to air is very low. | |
| Monitoring of inputs and outputs | - | There are no monitoring conditions for inputs and outputs proposed. | |
| Process monitoring | - | There are no process monitoring conditions proposed. | |



| DECISION TABLE | | | |
|----------------------------------|--|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Ambient quality monitoring | - | There are no ambient quality monitoring conditions proposed. | |
| Meteorological monitoring | - | There are no Meteorological monitoring conditions proposed. | |
| Improvements | | <p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Stormwater contaminated with hydrocarbons or other chemicals entering the environment through onsite soakwells. The chemical storage has been altered which may cause spillage to not enter the bunds and spill to the soakwells. Also regular forklift movement around the chemical storage can easily cause accidental spillage. <i>Impact:</i> Contamination of the land, perhaps creating a contaminated site. <i>Controls:</i> Chemicals are kept within bunds and a spill kit is available near the chemical storage.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> As a possible discharge into the soakwells would lead to contamination of their own property and possibly causing a breach of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>, DER believes that a review of the chemical storage would be required and changes made to reduce this risk. Thus DER will include an improvement condition for this.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor</p> | |



| DECISION TABLE | | | |
|---|---|---|----------------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <i>Likelihood: Unlikely Risk Rating: Moderate</i> | |
| Information | - | - | |
| Licence Duration | | The premises is of low/medium risk and as such the licence can be issued for 20 years. | |



5 Advertisement and consultation table

| Date | Event | Comments received/Notes | How comments were taken into consideration |
|------------|---|-------------------------|--|
| 20/07/2015 | Application advertised in West Australian (or other relevant newspaper) | No comments received | N/A |



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 |