



# Works Approval

## *Environmental Protection Act 1986, Part V*

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**Works Approval Holder:** Giacci Bros Pty Ltd

**Works Approval Number:** W5871/2015/1

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**Registered office:** Level 27, 45 Clarence Street,  
SYDNEY NSW 2000

**ACN:** 008 708 361

**Premises address:** Qube Bulk  
Mandurah Road  
EAST ROCKINGHAM WA 6169  
Being Lot 803 on Plan 55354 as depicted in Schedule 1

**Issue date:** Thursday, 19 November 2015

**Commencement date:** Monday, 23 November 2015

**Expiry date:** Thursday, 22 November 2018

The following category/s from the *Environmental Protection Regulations 1987* cause this Premises to be a prescribed premises for the purposes of the *Environmental Protection Act 1986*:

Category number	Category description	Category production or design capacity	Approved premises production or design capacity
33	Chemical blending or mixing: premises on which chemical products are mixed, blended, or packaged in a manner that causes or is likely to cause a discharge of waste to the environment	500 tonnes or more per year	110,000 tonnes per annual period

### Conditions

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

Date signed: 20 November 2015

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Jonathan Bailes  
Manager Licensing (Process Industries)  
Officer delegated under section 20  
of the *Environmental Protection Act 1986*

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# Works Approval Conditions

## 1 General

### 1.1 Interpretation

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

1.1.2 In the Works Approval, unless the contrary intention appears:

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

**'Annual period'** means the inclusive period from 1 January until 31 December;

**'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](mailto:info@der.wa.gov.au);

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

**'Schedule 1'** means Schedule 1 of [this](#) Works Approval unless otherwise stated;

**'Works Approval'** means this Works Approval numbered W5871/2015/1 and issued under the Act;

**'Works Approval Holder'** means the person or organisation named as the Works Approval Holder on page 1 of the Works Approval;

1.1.3 Any reference to an Australian or other standard in the Works Approval means the relevant parts of the standard in force from time to time during the term of this Works Approval.

1.1.4 Any reference to a guideline or code of practice in the Works Approval 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 Works Approval.

### 1.2 General conditions

1.2.1 The Works Approval Holder shall construct the works in accordance with the documentation detailed in Table 1.2.1:



**Table 1.2.1: Construction Requirements<sup>1</sup>**

Document	Parts	Date of Document
Works Approval Application Form	All	01 August 2015
SHEMS Plan - Works Approval Information and Environmental Assessment – Rockingham Depot	All, including Drawings and Attachments	Received by email 15 August 2015
SHEMS Plan - Stormwater Management Plan CBH/Qube Joint Project (SHEMS-QB-11-PL-0001 – Version 2.0)	All including Drawings and Appendices	11 November 2015

Note 1: Where the details and commitments of the documents listed in condition 1.2.1 are inconsistent with any other condition of this works approval, the conditions of this works approval shall prevail.

## 2 Information

### 2.1 Reporting

2.1.1 The Works Approval Holder shall submit a compliance document to the CEO, following the construction of the works and prior to commissioning of the same.

2.1.2 The compliance document shall:

- (a) certify that the works were constructed in accordance with the conditions of the works approval;
- (b) be signed by a person authorised to represent the Works Approval Holder and contain the printed name and position of that person within the company.



## Schedule 1: Maps

### Premises map

The Premises is shown in the map below. The pink line depicts the Premises boundary.





***Environmental Protection Act 1986, Part V***

**Works Approval: W5871/2015/1**

**Expiry date:** Thursday, 22 November 2018

Decision Document authorised by: Jonathan Bailes  
Delegated Officer



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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 checked="" type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	33	110,000 tonnes per year
Application verified	Date: 29/06/2015	
Application fee paid	Date: 25/08/2015	
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 checked="" 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"/>	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 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

Qube Bulk in arrangement with Co-operative Bulk Handling Limited (CBH) has agreed to provide storage and handling services for the client (CBH) from Qube's owned and operated storage facilities located at Rockingham (Mandurah Rd East Rockingham WA).

The Qube Bulk (Rockingham) site is located on flat land and surrounded by industrial and commercial use land. There are some common/reserve areas located to the south and east of the facility. The east and west of the property are unused land. There are no known wetlands, waterways or sensitive receptors in the immediate area (<1.5km).

The site comprises facilities that will be used for the storage, blending, and loading of trucks with products including:

- mono-ammonium phosphate (MAP) - stored in bulk (large volume)
- copper sulphate – stored in bags or as applicable (small volume)
- zinc sulphate– stored in bags or as applicable (small volume)
- flutriol – (small volume)
- urea – stored in bulk (large volume)

The total storage capacity at the site will be 20,000 tonnes.

The proposed activity is considered to be a category 33 activity under the *Environmental Protection Regulations 1987*; Chemical blending or mixing: premises on which chemical products are mixed, blended, or packaged in a manner that causes or is likely to cause a discharge of waste to the environment – 500 tonnes or more per year.

All unloading of bulk materials and blending activities will take place within an enclosed shed. The area will be cleaned prior to a truck entering the sheds; the trucks will reverse into the shed and rear tip. A dedicated front end loader will be located within the sheds to push up or transfer the product into stockpiles. The truck chassis and tailgate will be swept off after unloading to remove any product before the vehicle exits the sheds.

All blending will be done inside the sheds using specific blending equipment as shown in Appendix A. All transfer points on the blending system are enclosed to minimise dust generation.

All loading of product into trucks will be done on the sealed apron outside the shed door through a chute designed to minimise dust. Trucks will be cleaned (air-blown) to remove any product spillages and loads covered before being dispatched. Any product spilt on the sealed aprons will be immediately recovered.

Runoff from the roof of the facility will be collected and directed towards soak wells on site. Bio-retention basins will be installed to collect potentially contaminated stormwater from the shed apron.

The main emissions of concern from the proposed activity are fugitive emissions (dust and spills) of fertiliser products.

Qube has an Environmental Management System (EMS) and procedures in place that are certified to the ISO14001 *Environmental Management Systems* standard.





## 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
Fugitive emissions	N/A	<p><b>Construction and Operation</b></p> <p><i>Emission:</i> Fugitive dust emissions from:</p> <ul style="list-style-type: none"><li>• Shed construction;</li><li>• Unloading bulk materials in the shed by tipper truck;</li><li>• Stockpile management (pushing up stockpile in shed with front end loader);</li><li>• Blending activities (transfer of materials into hopper inside shed);</li><li>• Loading from storage onto trucks for bulk transport;</li><li>• Vehicle movements (material tracked out of sheds on wheels when vehicles exit);</li><li>• Split/damage to packaged blending materials resulting in a spill or leak from the package.</li></ul> <p><i>Impact:</i> Nuisance emissions to nearby receptors; and soil or water contamination due to deposition.</p> <p><i>Controls:</i></p> <ul style="list-style-type: none"><li>• Permanent water truck located on site for watering of unsealed surfaces during construction;</li><li>• Shed positioning and design considers prevailing wind direction;</li><li>• Sheds have one entry/exit door which will be open only during stockpile transfer operations;</li><li>• Sealed surfaces to be swept regularly to minimise tracking of material from the shed and windblown material from the apron surface;</li><li>• Hand sweeping, vacuum truck or sweeper will be used to clean up any spillage</li></ul>	<p>Application supporting documentation</p> <p><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
		<p>on the apron as appropriate;</p> <ul style="list-style-type: none"><li>• Suspend operations in high wind;</li><li>• Trucks will be loaded with the product on the apron of the shed through a chute designed to minimise dust;</li><li>• Trucks will be covered once loaded;</li><li>• Operational procedures in place that require trucks to be swept off if any spillage on chassis/tailgate area.</li><li>• Unloading will occur within the enclosed shed;</li><li>• Chemicals for blending are in packaged form and stored and handled inside the shed;</li><li>• Daily visual inspection of the shed and surrounding area;</li><li>• Spill reporting procedures in place;</li><li>• Spill response arrangements in place to control, contain and clean up any spills; and</li><li>• Shed floor to be regularly swept and kept clean.</li></ul> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Likely (rare for nuisance to residents due to separation distance). <i>Risk Rating:</i> Moderate (low for nuisance impacts)</p> <p><u>Regulatory Controls</u> No regulatory controls have been included on the works approval. DER will further assess the operation of the facility post-construction to determine if controls are required on the licence to address the moderate risk of dust deposition contaminating stormwater.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Likely (rare for nuisance to residents due to separation distance). <i>Risk Rating:</i> Moderate (low for nuisance impacts)</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><b>Operation</b></p> <p><i>Emission:</i> Stormwater contaminated with nutrients and metals. Potential for the discharge of product to the stormwater sump via spillage or stormwater run-off. <i>Impact:</i> Eutrophication of water in the stormwater sump on property and resultant contamination of ground. There are no waterways in the immediate area. <i>Controls:</i> Housekeeping measures and other controls that will be used to minimise fugitive dust deposition are detailed above. Runoff from the roof of the facility will be collected and directed towards soak wells on site. Bio-retention basins will be installed at the approximate midpoint of the site on the northern and southern boundaries. Runoff from the external apron areas where the fertilizer materials are handled will be directed to these basins. The basins will contain high phosphorous retention index soils and be planted with nutrient stripping vegetation to facilitate onsite water treatment. A stormwater management plan has been developed detailing how potentially contaminated water will be minimised and managed.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> No regulatory controls have been included on the works approval. DER will further assess the operation of the facility post-construction to determine if controls are required on the licence to address the moderate risk resulting from contaminated stormwater.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>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
Odour	N/A	<p><b>Operation</b></p> <p><i>Emission:</i> Some of the products generate an ammonia odour (MAP and urea) <i>Impact:</i> Nuisance for nearby residents (closest are approximately 1.5 km away). <i>Controls:</i> All products are stored and blended inside the shed. Separation distance.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The assessed risk is low. No specific regulatory controls are required. The premises will be subject to the general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	<i>Environmental Protection Act 1986</i>
Noise	N/A	<p><b>Construction and Operation</b></p> <p><i>Emission:</i> Construction noise; noise from truck movements to and from shed including reversing alarms and general 24/7 operation of the plant; front-end loader operations inside the shed and on the shed apron including reversing alarms; operation of blending plant inside the shed. <i>Impact:</i> Disturbance and nuisance to nearby residents (closest are approximately 1.5 km away). <i>Controls:</i> Separation distance. The site is in an industrial area with no nearby residential receptors; no specific controls are proposed.</p>	<i>Environmental Protection (Noise) Regulations 1997</i>  <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><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The assessed risk is low. No specific regulatory controls are required. The premises will be subject to the <i>Environmental Protection (Noise) Regulations 1997</i> and general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	
Information	W2.1.1 - W2.1.2	Conditions W2.1.1 – W2.1.2 require the submission of compliance documentation confirming the facility has been constructed in accordance with the submitted information which has been assessed.	N/A
Works Approval Duration	N/A	The works approval has been issued for a period of three years as the site is deemed a low risk.	N/A



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
31/08/2015	Application advertised in West Australian (or other relevant newspaper)	No comments received	N/A
02/09/2015	Application referred to interested parties listed	Comments received regarding risk of storing fertiliser product next to a site with diesel storage (risk of theft and creation of explosives)	The risk is not relevant to DER's assessment of emissions and discharges under Part V of the <i>Environmental Protection Act 1986</i>
10/11/2015	Proponent sent a copy of draft instrument	No comments received	N/A



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

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

### Blending equipment schematic

