

LICENCE NUMBER: L8669/2012/2

FILE NUMBER DER2014/000904

LICENSEE

CSBP Limited Wesfarmers House 40 The Esplanade PERTH WA 6000

ACN: 008 668 371

PREMISES

CSBP Limited Albany Fertiliser Distribution Facility Lot 2 on Plan 230541, 198 Hanrahan Rd ALBANY WA 6330 (As depicted in Attachment 1)

PRESCRIBED PREMISES CATEGORY

Schedule 1 of the Environmental Protection Regulations 1987

CATEGORY NUMBER	CATEGORY DESCRIPTION	CATEGORY PRODUCTION OR DESIGN CAPACITY	PREMISES PRODUCTION OR DESIGN CAPACITY
33	Chemical blending or mixing: premises on which chemicals or 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	416 000 tonnes

CONDITIONS OF LICENCE

Subject to the conditions of licence set out in the attached pages.

Date signed: 11 December 2015

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



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DEFINITIONS

In these conditions of licence, unless inconsistent with the text or subject matter:

"annually" means a 12 calendar month period, commencing on the 1st July;

"AS/NZS" means the most recent version (unless otherwise stated) of the specified Australian and New Zealand Standard as jointly published by Standards Australia International Ltd, Sydney and Standards New Zealand, Wellington;

"AS/NZS 5667.1" means the most recent version of 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 most recent version of the Australian Standard AS/NZS 5667.11 Water Quality – Sampling – Guidance on sampling of groundwaters;

"contaminated stormwater" means stormwater which has the potential to contain fertiliser products and other chemical contaminates;

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

'CEO' for the purposes 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;

"DER" means the Department of Environment Regulation;

"extreme rainfall event" means the rainfall quantity from a one in ten year rainfall event of 72 hours duration, as defined by 'Australian Rainfall and Runoff: A Guide to Flood Estimation' (Institution of Engineers, 1987);

"g/yr" means grams per year;

"incident responses" means those relating to Section 72 of the Environmental Protection Act 1986;

"kg/yr" means kilograms per year;

"mg/L" means milligrams per litre;

"NATA" means the Australian National Association of Testing Authorities;



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'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; and

"stormwater" means water as a result of rainfall that has not come into contact with fertiliser products and chemical contaminants.

CONDITIONS

STORMWATER MANAGEMENT

- 1. The licensee shall direct stormwater run-off, such as water from roofs and site drainage so that it does not enter fertiliser, raw material or product storage areas.
- 2. The licensee shall ensure that potentially contaminated stormwater and wastewater from operations is captured within the lined drainage system and directed to the lined pond.

WASTEWATER TREATMENT POND MAINTENANCE

- 3. The licensee shall manage the lined treatment pond in a manner such that:
 - a) stormwater runoff resulting from site drainage shall be prevented from entering the pond or causing the erosion of outer pond embankments;
 - b) vegetation (emergent or otherwise) is prevented from encroaching onto inner pond embankments; and
 - c) a minimum 400 mm vertical internal freeboard is maintained at all times, except as a result of an extreme rainfall event.

TREATED WASTEWATER DISCHARGE

4. The licensee shall ensure that no wastewater is discharged to the environment, except treated wastewater from the wastewater treatment plant via the overflow channel (SW4) to the Munster Hill Drain, as depicted on Attachment 2.

TREATED WASTEWATER DISCHARGE LIMITS

5. The Licensee shall not cause or allow point source emissions to surface water that do not meet the limits listed in Table 1 below.



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Table 1: Discharge limits for treated wastewater discharged to Munster Hill Drain

Emission	Parameter	Limit
point		
	рН	Not less than 4.5 or greater than 10.5
	Total suspended	-
	solids	
	Total phosphorus	Concentration not greater than 3mg/L
	Total nitrogen	-
SW4	Sulphate	-
(V-notch weir)	Cadmium	Concentration not greater than 0.025 mg/L
	Mercury	Concentration not greater than 0.0005mg/L
	Lead	Concentration not greater than 0.01mg/L
	Fluoride	-
	Copper	0.025mg/L
	Zinc	0.025mg/L

- 6. The licensee shall conduct an investigation into any exceedance of any limit in Table 1 of condition 5 of this licence, and within 14 days of becoming aware of that exceedance provide a report in writing to the CEO that includes, but is not limited to:
 - a) the date/s and time/s that the discharge occurred during the exceedance reporting period;
 - b) volume/s discharged during the exceedance reporting period;
 - c) reason for the discharge events;
 - d) sampling information for the period of the limit exceedance, including:
 - i) the date and time the last sampling was undertaken;
 - ii) the position of the person who undertook the sampling; and
 - iii) a copy of the laboratory sampling results that are the basis for the limit exceedance;
 - e) the nature and extent of the discharge over that period and potential or known environmental consequences;
 - f) the corrective actions taken to mitigate any environmental impacts; and
 - g) the corrective actions taken to prevent a recurrence of the limit exceedance.

MONITORING CONDITIONS

7. The licensee shall undertake the monitoring in Table 2 according to the specifications in that table.



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Table 2: Sampling and monitoring program

Column 1	Column 2	Column 3	Column 4	
Sample Location	Parameters to be measured	Sampling frequency	Method	
<u>SW4</u> (V-notch weir)	Cumulative water flows (in m ³) from the disc Munster Hill Drain of all discharges.	charge pond to Continuous (when flowing)	-	
		anganese (Mn) kel (Ni) d (Pb) ercury (Hg) c (Zn) minum (Al) cium (Ca) ² coalt (Co) tassium (K) agnesium (Mg) ² olybdenum (Mo)	AS/NZS 5667	
Groundwater Monitoring Bores C2, C4, C6, C8, C12, C15, C17 (as shown in Attachment 1)	(TDS) 19) mang	ssium (K) sesium (Mg) yanese (Mn) odenum (Mo) I (Ni) (Pb) ur (S) ate (SO ₄) n) dium (V) Zn) de (CI). September, Uecember. monitoring bore is dry) September, December. wonitoring bore is dry)	AS/NZS 5667	

Note 1: In-situ non-NATA accredited analysis permitted Note 2: Alternative sample preservation and storage permitted

- 8. The licensee shall ensure that all water samples are collected, handled and preserved in accordance with AS/NZS 5667.1 and AS/NZS 5667.11 unless otherwise indicated in the relevant table.
- 9. The licensee shall ensure that all laboratory samples collected in accordance with condition 7 are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured unless otherwise indicated in the relevant table.



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SLUDGE AND LEACHATE MANAGEMENT

10. The licensee shall:

c)

- a) advise the CEO in writing no less than 72 hours prior to taking a treatment pond offline for maintenance works;
- b) advise the CEO in writing no less than 14 days prior to the removal of sludge from a treatment pond; and
 - where sludge is temporarily stored on-site; direct sludge to a hard-stand area which:
 - i) is adequately bunded to contain surface runoff of leachate or sludge; and
 - ii) returns sludge leachate from the storage area back to the lined pond.

REPORTING CONDITIONS

ANNUAL ENVIRONMENTAL REPORT

- 14. The licensee shall submit to the CEO, by **31 August in each year**, an Annual Environmental Report containing data collected over the previous year (**1 July to 30 June**). The report shall contain but not be limited to:
 - a) monitoring data and other collected data required by any condition of this licence (data should be provided in tables and in graphical format);
 - i) calculation of annual loads of Total Nitrogen and Total Phosphorus discharged to Munster Hill Drain.
 - b) an explanation of the monitoring data and other collected data required by any condition of this licence including:
 - i) a comparison with previous ten (10) years of monitoring data; and
 - ii) any limits set in this licence;
 - c) the number and type of complaints received, including nature of complaint (cross referenced with prevailing wind directions) and action taken;
 - the number of spills or discharges of environmental hazardous materials which occurred otherwise than in accordance with the conditions of this licence and the actions taken to address these spills or discharges and future preventative measures;
 - e) any issues raised from DER inspections or incident responses during the reporting period together with details as to how these have been addressed and or rectified, or if the required work has yet to be completed, how and when the work will be completed and or rectified;
 - f) any changes to site boundaries, location of monitoring sites, extraction bores and surface drainage channels; and
 - g) copies of any original laboratory reports for the reporting period to be made available upon request.



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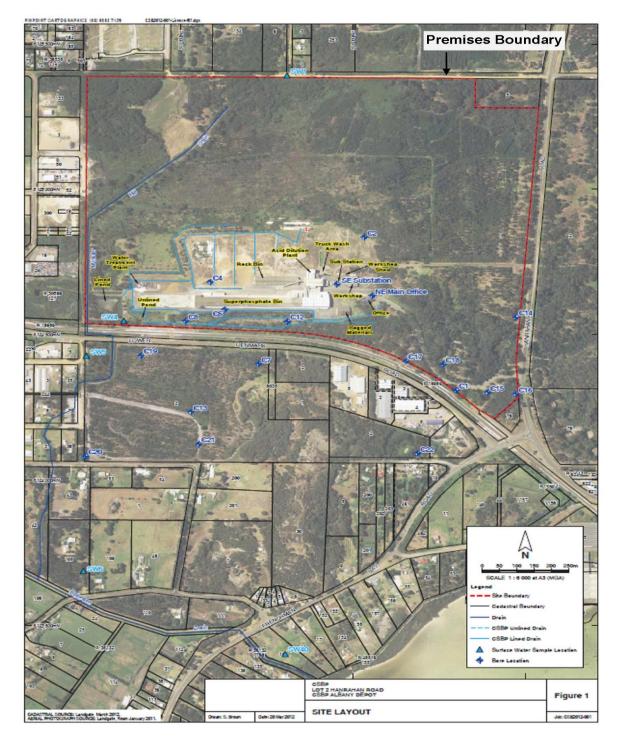
ANNUAL AUDIT COMPLIANCE REPORT

15. The licensee shall by **31 August in each year**, provide to the CEO, an Annual Audit Compliance Report in the form in Attachment 3 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the premises for the reporting period 1 July the previous year and ending on 30 June in that year.



LICENCE NUMBER: L8669/2012/2 **ATTACHMENT 1: PLAN OF PREMISES**

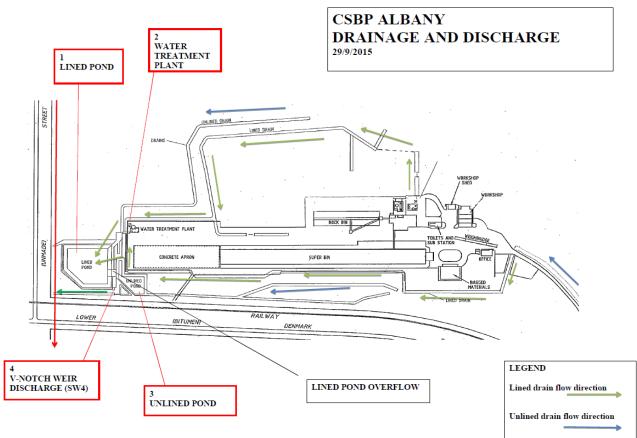
FILE NUMBER DER2014/000904



ISSUE DATE COMMENCEMENT DATE: **EXPIRY DATE:** AMENDMENT DATE



LICENCE NUMBER: L8669/2012/2 FILE NUMBER DER2014/000904 ATTACHMENT 2: MUNSTER HILL DRAIN DISCHARGE POINT LOCATION



Munster Hill Drain

ISSUE DATE COMMENCEMENT DATE: EXPIRY DATE: AMENDMENT DATE



LICENCE NUMBER: L8669/2012/2 FILE NUMBER DER2014/000904 ATTACHMENT 3 - 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 D 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:



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SECTION B

DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
Yes Reported to DER verbally Date Reported to DER in writing Date	□ No
d) Has DER taken, or finalised any action in relation to the non con	npliance?:
e) Summary of particulars of the non compliance, and what was the	e environmental impact:
f) If relevant, the precise location where the non compliance occurr	ed (attach map or diagram):



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g) Cause of non compliance:

h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:

i) Action taken or that will be taken to prevent recurrence of the non compliance:

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



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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:
	by the individual licence holder, or
An individual	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	by the principal executive officer of the licensee; or
unincorporated company	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.
	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
A corporation	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 cutherity	by the principal executive officer of the licensee; or
A public authority (other than a local government)	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	by the chief executive officer of the licensee; or
a local government	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.



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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)	

ISSUE DATE COMMENCEMENT DATE: EXPIRY DATE: AMENDMENT DATE



Decision Document

Environmental Protection Act 1986, Part V

Proponent:	CSBP Limited
Licence:	L8669/2012/2
Registered office:	CSBP Limited Wesfarmers House 40 The Esplanade PERTH WA 6000
ACN:	008 668 371
Premises address:	CSBP Limited Albany Fertiliser Distribution Facility Lot 2 on Plan 230541, 198 Hanrahan Rd ALBANY WA 6330
Issue date:	Thursday, 13 December 2012
Commencement da	te: Thursday, 13 December 2012
Expiry date:	Monday, 12 December 2016

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.

Decision Document prepared by:

Clint Joseph Licensing Officer

Decision Document authorised by:

Jonathan Bailes Delegated Officer



Contents

- 1 Purpose of this Document
- 2 Administrative summary
- 3 Executive summary of proposal
- 4 Decision table
- 5 Advertisement and consultation table

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 New Licence Licence amendmen Works Approval am				
Activities that cause the premises to become prescribed premises	Category number(s)Assessed design capacity33416 000 tonnes per an period				
Application verified Application fee paid	Date: 02/10/2015 Date: 21/10/2015				
Works Approval has been complied with	Yes No	N/A			
Compliance Certificate received	Yes No	N/A			
Commercial-in-confidence claim					
Commercial-in-confidence claim outcome					
Is the proposal a Major Resource Project?	Yes No				
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes No	Referral decision No: Managed under Part V			
Is the proposal subject to Ministerial Conditions?	Yes No	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 No⊠ Department of Wate	er consulted Yes 🗌 No 🖂			
Is the Premises within an Environmental Protection Policy (EPP) Area Yes \square No \boxtimes					
Is the Premises subject to any EPP requirements? Yes No					

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3 Executive summary of proposal

CSPB Albany is located at 198 Hanrahan Road Albany, Western Australia. The premises is shown on Lot 2 on Plan 230541 and is bounded by Hanrahan Road to the east and by the railway reserve adjacent to Lower Denmark Road to the south. The premises are located within the City of Albany, Western Australia, which is the local government authority. The premises are approximately 2km from Albany centre and 1.5km from Princess Royal Harbour.

Surrounding land uses within a 500m radius of the operational areas of the site include the City of Albany landfill and light industrial areas. There is some low-density residential properties present approximately 650m north and 550m south of the operational areas.

Current activities on the premises include the receipt, crushing and screening, blending, storage and despatch of bulk granular fertilisers. Fertiliser is imported via the Albany Port or transferred directly by road from CSBP's manufacturing facility in Kwinana, Western Australia.

Trucks that arrive at the site for the despatch of fertilisers are required to be free of grain before loading. Brooms/brush and a rubbish shed are provided along the entrance driveway for drivers to dry clean their truck before loading to remove residual grain. Trucks are directed to the despatch area where they are loaded under an awning by a system of shuttle and product conveyors. Rumble strips are present at the exits to the super shed and rock shed to assist in removal of the product from vehicle tyres to minimise tracking of products outside.

The CSBP Albany site is designed to direct stormwater away from fertiliser, raw material and products storage areas. All hardstand areas within the main plant area have concrete drains or pipes (concrete or PVC) that are connected to open lined drains. The open lined drains traverse the north and south sides of the operations then converge west of the site and drain into the lined pond. Water from the lined pond is automatically pumped to the Waste Water Treatment Plant (WWTP) for treatment.

There are no naturally occurring surface water bodies on the premises. However, the Munster Hill open stormwater drain enters the CSBP premises on the northern border and runs in a SW direction to the western border, from where it continues south approximately 1km to flow into the Robinson Road Drain. From the confluence of Munster Hill Drain with the Robinson Road Drain water flows for approximately a further 850 metres south into Princess Royal Harbour. The CSBP Albany facility primarily discharges treated wastewater into the Munster Hill Drain. There is also discharge via groundwater from the site and untreated wastewater on occasions when high rainfall events result in overflow from the lined and unlined storage ponds.

This Licence is the result of an amendment sought by DER to extend the licence expiry date by 12 months, as the licence previously would have expired on the 12 December 2015. DER is currently reassessing the discharge of stormwater (treated and untreated) to the Munster Hill Drain and will review the regulatory controls once this is complete and before any reissue of the licence in December 2016.

In amending this licence, DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No significant changes have occurred and, therefore, DER has only amended conditions relating to emissions and discharges to take account of administrative changes implemented within DER.



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
Dust Management	N/A	There is a potential for dust emissions to occur through truck movements and product storage, handling and loading. Dust can impact the amenity of nearby receptors, and more significantly for this site, can contribute to the nutrient loading of stormwater generated on site. The risk of dust impacting the amenity of receptors has previously been assessed as low, and the risk profile has not changed since that assessment. Management controls are implemented through the site environmental management plan with significant emphasis on dust minimisation and housekeeping. The controls are well integrated into the site operations. In accordance with administrative changes implemented within DER, the generic dust management conditions (1 and 2) have been removed along with specific conditions relating to actions implemented through the site management plan (conditions 3 and 7). The general provisions of the <i>Environmental Protection Act 1986</i> and secondary legislation are sufficient to regulate the risk.	Environmental Protection Act 1986 Environmental Protection (Unauthorised Discharges) Regulations 2004
Hydrocarbon/ Chemical Storage		Conditions 4 and 5 of the previous licence version have been removed as they were not sufficiently clear or certain. Storage of hydrocarbons and chemicals (excluding fertiliser products) in relatively low quantities is a secondary activity and therefore not subject to conditions in a licence.	Guidance Statement - Licensing and works approvals process

Environmental Protection Act 1986 Decision document: L8669/2012/2 File Number: DER2014/000904

Amendment date: Friday, 11 December 2015

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DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Waste Management		Condition 6 of the previous licence version has been removed as it relates to the offsite disposal of waste and not a direct emission or discharge from the premises.	Environmental Protection Act 1986
Wastewater Treatment Pond Maintenance	L3	Condition 3 has been updated to remove the requirement for the licensee to manage the lined treatment pond in a manner such that there is no discernible seepage loss from the pond. The condition is not clear as the term discernible is not an objectively measured amount. The pond is lined with a synthetic liner designed and managed to minimise seepage through it. The removal of this condition does not alter the risk posed by seepage of nutrient-rich water from the pond.	N/A
Treated Wastewater Discharge Limits	L5	Condition 4(b) has been deleted as it was a duplication of Condition 5. Condition 5 has been updated to include limits only. Targets have been removed in accordance with administrative changes implemented within DER. Parameters that previously had a target but no limit have not been assigned a limit. DER is currently re-assessing the discharge of stormwater (treated and untreated) to the Munster Hill Drain and will review the regulatory controls once this is complete and before any reissue of the licence in December 2016. The licensee continues to monitor the parameters without limits and reports the data to DER. The previous licence targets are contained in the site management plan; any exceedance of a target will continue to trigger an internal investigation and review.	N/A
Monitoring Conditions	L7 and L9	Conditions 7 and 9 have been updated to remove the reference to analytical standards that are no longer relevant. The method of flow monitoring has been removed to allow pump run hours to be used in case of flowmeter failure. The use of in-field monitoring techniques for pH measurement has been permitted to allow deviation from the NATA standard in condition 9. Alternative sample storage requirements has been permitted for some parameters to allow for deviations from the Australian Standards referenced in condition 8 due to the composite sampling techniques used, in-house sample storage protocol, and transportation times to the laboratory in Perth.	N/A

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DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Environmental Improvement Plan	N/A	Conditions 18 and 19 relating to environmental improvement plans has been removed as all appropriate reports have been submitted to DER for assessment. The Environmental Improvement Plan is maintained by the site and continues to be implemented.	N/A
Licence Duration	N/A	The expiry date of the licence has been extended for one year. DER is currently re- assessing the discharge of stormwater (treated and untreated) to the Munster Hill Drain and will review the regulatory controls once this is complete and before any reissue of the licence in December 2016	N/A

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5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration	
03/12/2015	Proponent sent a copy of the draft amended licence	Comments received 08/12/2015	Appropriate comments incorporated in licence.	

6 Risk Assessment Matrix

Note: This matrix is taken from the Corporate Policy Statement No.7 - 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	