



Licence

Environmental Protection Act 1986, Part V

Licensee: PEAG Holdings Pty Ltd

Licence: L8171/2007/2

Registered office: 24 Hurrell Way
ROCKINGHAM WA 6168

ACN: 609 291 858

Premises address: R.M.D. Tankers
24 Hurrell Way
ROCKINGHAM WA 6168
Being Lot 1344 on Plan 211414 as depicted in Schedule 1.

Issue date: Thursday, 23 August 2012

Commencement date: Thursday, 30 August 2012

Expiry date: Tuesday, 29 August 2017

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
61	Liquid waste facility: premises on which liquid waste produced on others premises (other than sewage waste) is stored, reprocessed, treated or irrigated.	100 tonnes or more per year	1,800 kilolitres per annual period

Conditions

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

Date signed: 18 February 2016

.....
Caron Goodbourn
A/Manager Licensing (Waste Industries)
Officer delegated under section 20
of the *Environmental Protection Act 1986*



Contents

Licence	1
Contents	2
Introduction	2
Licence conditions	4
1 General	4
2 Monitoring	7
3 Information	7
Schedule 1: Maps	9
Schedule 2: Reporting & notification forms	11

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 works with the business owners, community, consultants, industry and other representatives 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.

Other Guidelines which you should be aware of include:



- *Western Australian Guidelines for Biosolids Management*, Department of Environment and Conservation, December 2012 (as amended from time to time).

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 RMD Tankers site at 24 Hurrell Way Rockingham was commissioned in 2007 for the acceptance of waste oily waters and low strength industrial wash waters defined as controlled wastes under the *Environmental Protection (Controlled Waste) Regulations 2004*. The site was constructed without a works approval and the matter dealt with consistent to DER’s Enforcement and Prosecutions Policy.

Oily waters are treated through physical processes that include a series of gravity fed interceptors and settling tanks. Separated hydrocarbon and treated waters are stored pending disposal or reuse at other facilities. Sludge and solids generated by the process are stored on a bunded hardstand pad pending mixing with sawdust and disposal at landfill. The facility is located in a light industrial zoned area and surrounded by other businesses such as mechanics, small factories and workshops.

There is a charcoal filter for the transfer of treated oil to holding tanks which is a potential source of odour. The liquid that has been through the treatment process (and had some contamination separated out) is transported and re-used at other facilities or disposed of at other licenced premises. This treated liquid does not currently undergo any testing to identify what it contains, and as such, presents an unknown risk to the environment should it be discharged. A major identified environmental risk associated with the operation is related to spills and the escape of treated and untreated wastewater from various areas within the operation, with the potential to contaminate surrounding soil and groundwater.

This Licence is the result of transferring the licence holder from Daromi Pty Ltd to PEAG Holdings Pty Ltd .

The licences issued for the Premises since 30/08/2007 are:

Instrument log		
Instrument	Issued	Description
L8171/2007/1	30/08/2007	New licence (nil condition)
L8171/2007/2	01/07/2007	Licence re-issue (conditions added)
L8171/2007/2	18/12/2014	DER initiated licence amendment
L8171/2007/2	18/02/2016	Licence transfer - Daromi Pty Ltd to PEAG Holdings Pty Ltd

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 September until 31 August in the following year;

'averaging period' means the time over which a limit or target 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:

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*.

"Discharge pit" means the designated area for discharging liquid waste into the waste treatment process as depicted in the map of the treatment process in Schedule 1;

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

'Licence' means this Licence numbered L8171/2007/2 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;

'process equipment' means any wastewater or sludge containment infrastructure or wastewater treatment vessel;

'quarterly' means the 4 inclusive periods from 1 December to (in the following year) 28 February, 1 March to 31 May, 1 June to 31 August, 1 September to 30 November;

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

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

'usual working day' means 0800 – 1700 hours, Monday to Friday 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;



'wastewater treatment vessels' means any vessel or tank containment infrastructure associated with the treatment of wastewater;

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.

1.2 Premises operation

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

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

- (a) it is of a type listed in Table 1.2.2; and
- (b) the quantity accepted is below any limit listed in Table 1.2.2; and
- (c) it meets any specification listed in Table 1.2.2

Table 1.2.2: Waste acceptance			
Waste	Waste Code	Quantity Limit	Specification¹
Oils and Emulsions		1,800 kilolitres per annual period (combined total allowable for all waste types)	Tankered into the premises and discharged only into the Discharge pit.
Waste oil and water, or hydrocarbons and water, mixtures or emulsions.	J120		
Industrial Wash Water			
Car and truck wash waters	L100		
Industrial wash water contaminated with a controlled waste.	L150		

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



1.2.3 The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the processes set out in Table 1.2.3 and in accordance with any process requirements described in that table.

Table 1.2.3: Waste processing		
Waste type	Process	Process requirements
Waste oil and water, or hydrocarbons and water, mixtures or emulsions; Car and truck wash waters; Industrial wash water contaminated with a controlled waste.	Receipt, storage and physical treatment.	<ul style="list-style-type: none"> • Only to be receipted, handled and stored within a bunded hardstand area to prevent ingress of uncontaminated surface water run-off; • Physical treatment by separation; • Storage of treated waste shall be in enclosed vessels pending removal from the Premises.
Oily sludge arising from the waste treatment process	Storage	<ul style="list-style-type: none"> • Storage on a hardstand and bunded area pending removal from the Premises; • Surface run-off and leachate is directed back to the waste treatment process

1.2.4 The Licensee shall ensure that waste material is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.2.4.

Table 1.2.4: Containment infrastructure		
Vessel or compound	Material	Requirements
Discharge pit	All incoming wastewater and sludge	The discharge pit shall consist of a hardstand area and be surrounded by a bund which ensures all sludge is contained and deposited liquid waste is directed to the start of the treatment process.
Dry waste sludge pit	Sludge and other solid contaminated material	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 uncontaminated surface run-off from entering and which directs contaminated liquid to the start of the treatment process.
All tanks, pits and vessels used in the treatment processes (oil recovery area, interceptor pits and tanks, settling tanks, flock tank, charcoal filters)	Wastewater	Impermeable receptacle or storage chamber
All tanks used for the storage of liquid that has been through the treatment processes	Treated wastewater	Impermeable receptacle or storage chamber

1.2.5 The Licensee shall manage the wastewater treatment vessels such that:

- (a) overtopping of the vessels does not occur; and
- (b) stormwater runoff is prevented from entering the vessels; and
- (c) there is no discernible seepage loss from the vessels.

1.2.6 The Licensee shall:

- (a) implement security measures at the site to prevent as far as is practical unauthorised access to the site; and
- (b) undertake regular inspections of all security measures and repair damage as soon as practicable; and
- (c) ensure the entrance gates are closed and locked when the site is closed or unmanned.



2 Monitoring

2.1 Monitoring of inputs and outputs

2.1.1 The Licensee shall undertake the monitoring in Table 2.1.1 according to the specifications in that table.

Input/Output	Parameter	Units	Frequency
All wastewaters and controlled liquid wastes received on to the Premises.	Volume (cumulative)	Litres or cubic metres per week	Quarterly
Water or liquid that has completed the treatment process and is removed from the Premises.	Volume (cumulative)	Litres or cubic metres per week	Quarterly
Oils and other hydrocarbons separated by the treatment process and removed from the Premises	Volume (cumulative)	Litres or cubic metres per week	Quarterly
Sludge and other contaminated solids that accumulate as part of the treatment process and are removed from the Premises.	Weight (cumulative)	Tonnes or kilograms per week	Quarterly

3 Information

3.1 Records

3.1.1 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 3.1.1(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.

3.1.2 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.

3.1.3 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.

3.2 Reporting

3.2.1 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 3.2.1 in the format or form specified in that table.



Table 3.2.1: 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 2.1.1	Monitoring of inputs and outputs	Tabular format
3.1.2	Compliance	Annual Audit Compliance Report (AACR)
3.1.3	Complaints summary	None specified

Note 1: Forms are in Schedule 2

- 3.2.2 The Licensee shall ensure that the Annual Environmental Report also contains:
- (a) any relevant process, production or operational data recorded under condition 2.1.1; and
 - (b) an assessment of the information contained within the report against previous monitoring results and Licence limits.
- 3.2.3 The Licensee shall submit the information in Table 3.2.3 to the CEO at the Contact Address according to the specifications in that table.

Table 3.2.3: Non-annual reporting requirements				
Condition or table (if relevant)	Parameter	Reporting period	Reporting date (after end of the reporting period)	Format or form
Table 2.1.1	Monitoring of inputs and outputs	Each quarter	Within 14 days	None specified

3.3 Notification

- 3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO at the Contact Address and in accordance with the notification requirements of the table.

Table 3.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
1.2.2	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

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

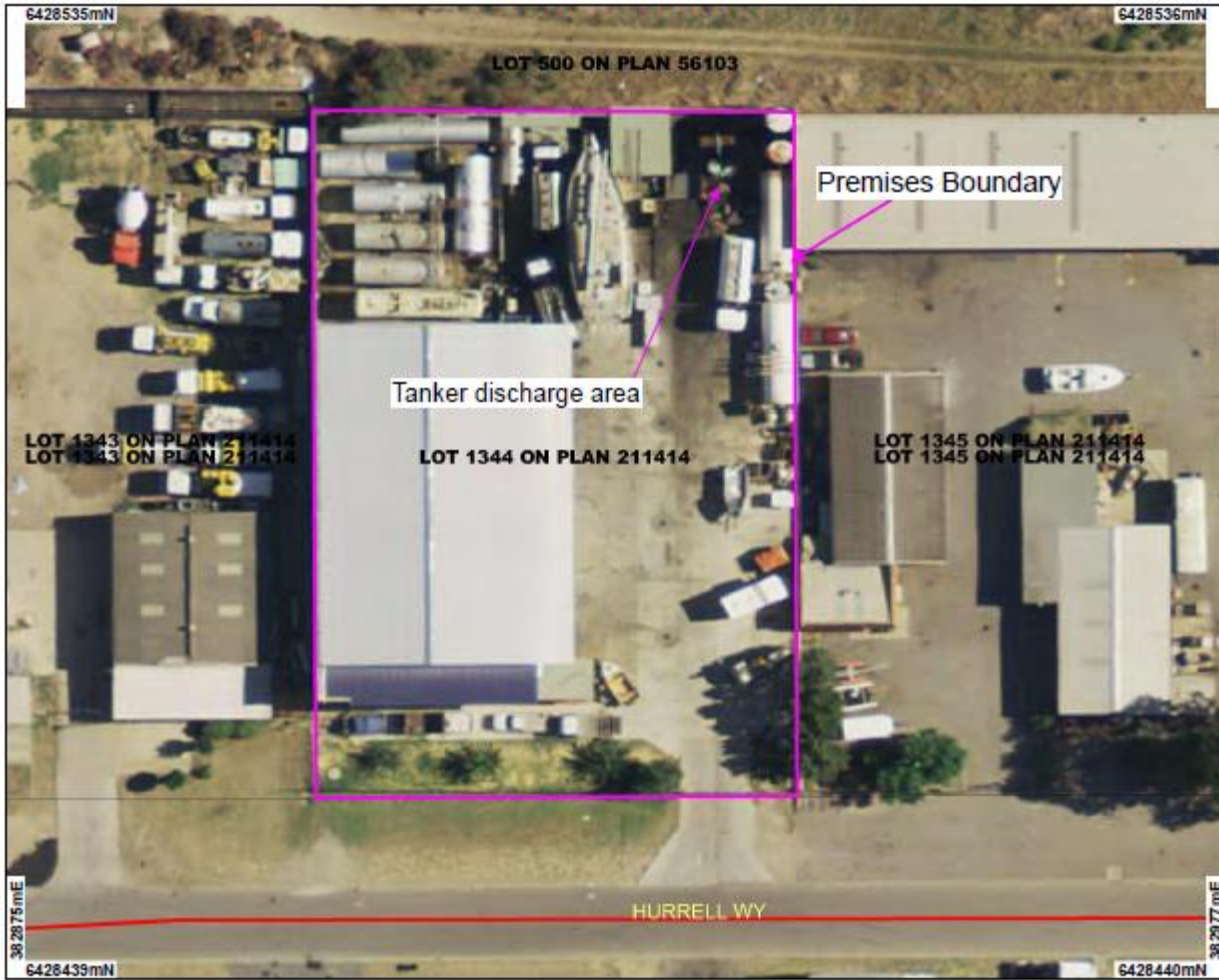


Schedule 1: Maps

Premises map

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

RMD Tankers



LEGEND

Road Centrelines	<input type="checkbox"/> Crown Reserve	<input type="checkbox"/> Public Roads
Perth Metropolitan Area	<input type="checkbox"/> State Forest / Timber Reserve	<input type="checkbox"/> Unallocated Crown Land
Central 15km Orthomosaic - Landgate 2012	<input type="checkbox"/> Marine Park	<input type="checkbox"/> Water
Cadastral	<input type="checkbox"/> Crown Lease	<input type="checkbox"/> Other Public Lands
<input type="checkbox"/> Freehold (cont)	<input type="checkbox"/> Lease / Reserve	
	<input type="checkbox"/> Lease on State Forest / Timber Reserve (cont)	

Scale 1:501
(Approximate when reproduced at A4)

Geocentric Datum Australia 1994

Note: the data in this map have not been projected. This may result in geometric distortion or measurement inaccuracies.

Prepared by: Iuliod
Prepared for:
Date: 14/10/2014 10:28:43 AM

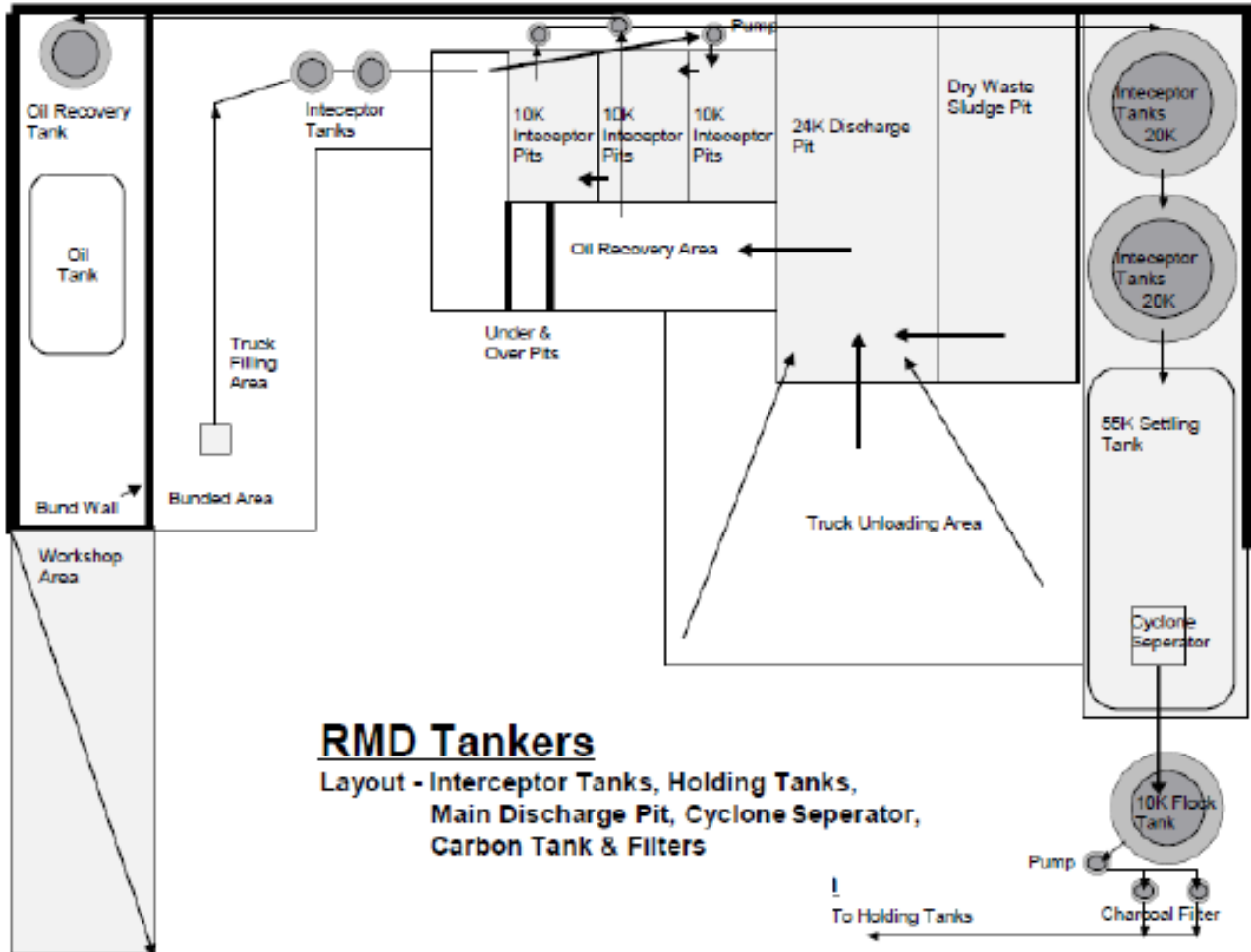
Information derived from this map should be confirmed with the data custodian acknowledged by the agency acronym in the legend.

Government of Western Australia
Department of Environment Regulation
WA Crown Copyright 2002



Conceptual map of the waste treatment process

The location of the discharge pit (described in Table 1.3.1) is indicated below:
(not to scale)





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)



Licence: L8171/2007/2
Form: N1

Licensee: PEAG Holdings 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	L8171/2007/2
Name of operator	PEAG Holdings Pty Ltd trading as RMD Tankers
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 PEAG Holdings Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: PEAG Holdings Pty Ltd

Licence: L8171/2007/2

Registered office: 24 Hurrell Way
ROCKINGHAM WA 6168

ACN: 609 291 858

Premises address: R.M.D. Tankers
24 Hurrell Way
ROCKINGHAM WA 6168
Being Lot 1344 on Plan 211414

Issue date: Thursday, 23 August 2012

Commencement date: Thursday, 30 August 2012

Expiry date: Tuesday, 29 August 2017

Date of transfer: Thursday, 18 February 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 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:

Dr Bhabesh Das
Senior Licensing Officer

Decision Document authorised by:

Caron Goodbourn
A/Manager Licensing (Waste Industries)



Contents

Decision Document	1
Contents	2
1 Purpose of this Document	2
2 Administrative summary	3
3 Executive summary of proposal and assessment	4
4 Decision table	5
5 Advertisement and consultation table	7
6 Risk Assessment	8

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 type="checkbox"/>	Works Approval amendment <input type="checkbox"/>
	Licence transfer <input checked="" type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	61	1800 kilolitres per annual period
Application verified	Date: 11/02/2016	
Application fee paid	Date: 11/02/2016	
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"/>
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

This partial decision document is the result of transferring licence occupier from Daromi Pty Ltd to PEAG Holdings Pty Ltd, trading as RMD Tankers, at 24 Hurrell Way Rockingham. The site is located in a light industry zoned area of the City of Rockingham, with various small businesses in adjoining units including; a rainwater tank supplier, garage door manufacturer, cabinetmaker, screen printer, welding services and others. The shoreline of Cockburn Sound is approximately 1.65km north west of the site and the nearest residential areas are approximately 1.3km north west, 620m south east, 715m south and 750m south west of the facility.

The recommended separation distance for chemical or oil recycling in Guidance for the Assessment of Environmental Factors (Environmental Protection Authority, June 2005) is 500 m – 1000 m depending on size. RMD Tankers is considered a comparatively small-scale operation, is appropriately located within a light industrial zoned area and has at least 600 m separation to the nearest sensitive receptor i.e. dwelling.

A review of information on the Perth Groundwater Atlas shows that the surface geology is characterised by Safety Bay Sands (Aeolian and beach lime sand) and brackish water quality. The depth to water table from natural surface contours is estimated to be 5m or 1m relative to Australian Height Datum (AHD). Estimates are stated to fluctuate between 0.5m and 3m due to seasonal variation.

Oily waters are treated through physical processes that include a series of gravity fed interceptors, settling tanks and a flocculation system. Separated hydrocarbons and treated waters are stored in bulk tanks pending disposal or reuse at other facilities. Sludge and solids generated by the process are stored on a bunded hardstand pad pending mixing with sawdust and disposal at landfill.

There is a charcoal filter for the transfer of treated oil to holding tanks which is a potential source of odour. Odour is neutralised by adding odour neutraliser. The liquid that has been through the treatment process (and had some contamination separated out) is transported and re-used at other facilities or disposed of at other licenced premises.

This partial decision document refers to the change of occupier, administrative changes and removal of redundant conditions from the licence.



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>Previous condition 1.2.1 replicates the provisions of the <i>Environmental Protection Act 1986</i>. Therefore, the condition is removed from the licence.</p> <p>Previous condition 1.2.2 is not a specified condition in terms of a maintenance schedule of the pollution control and monitoring equipment. Hence the condition is considered redundant and is removed from the licence.</p> <p>Previous conditions 1.2.3 and 1.2.4 relates to the storage of dangerous goods and is removed on the basis the storage of dangerous goods will need to be such that no unauthorised discharges occur (as regulated under the provisions of the UDR). Dangerous goods management is regulated by the Department of Mines and Petroleum, where applicable.</p> <p>Previous condition 1.2.5 relating to stormwater management is not enforceable as it is not sufficiently clear or certain in terms of stormwater infrastructure and management. Hence the condition is considered redundant and is removed from the licence</p>	<i>Environmental Protection (unauthorised Discharges) Regulations 2004</i>
		Previous condition 2.1.1, 2.2-2.5 are removed from the licence as there are no specified conditions relating to emissions	



		Previous conditions 2.6.1 and 2.6.2 related to dust. The activities on site do not generate any dust emissions. Dust can be adequately managed under section 49 of the <i>Environmental Protection Act 1986</i> . Hence the conditions are removed from the licence.	<i>Environmental Protection Act 1986</i>
General conditions		Previous condition 2.7.1 relating to odour has been removed. The charcoal filter for the transfer of treated oil to holding tank may cause odour emissions. Odour is neutralised by odour neutraliser if necessary. However odour can be adequately regulated through the general provisions of the Environmental Protection Act 1986. Condition 3.1.3 requires the implementation of a complaints management system which would include any odour complaints received.	
		Previous conditions 3.1 -3.9 do not have any specified conditions and are considered redundant . They are removed from the licence.	
		The previous improvement conditions 4.1 have been removed from the licence as the Licensee has complied with the conditions. DER received the compliance letter from RMD Tankers on 16/11/2015.	
Reporting	L3.2	Previous condition 5.3.1, Table 5.3.1 (now Table 3.3.1) The text in previous Table "Any failure or malfunction of any pollution control equipment or any incident, which caused, is causing or may cause pollution" has been removed from the licence as it replicates the provisions of the EP Act. Form N1 has been updated accordingly.	Environmental Protection Act 1986 (EP Act)
Licence duration	N/A	The licence period has not been changed as a result of this transfer and expires on 29 August 2017.	Application dated 8/2/2016



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
17/02/2016	Proponent sent a copy of draft instrument	Comments received all ok except a minor typo	Correction has been made



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