

Works Approval

Environmental Protection Act 1986, Part V

Proponent: Bunbury Powder Coating Pty Ltd

Works Approval: W5888/2015/1

Registered office: 22 South Western Highway

DONNYBROOK WA

ACN: 165 194 552

Premises address: 71 Craige Street, Davenport

BUNBURY 6230

Being Lot 100 on Plan 48861 as depicted in Schedule 1

Issue date: Thursday, 8 October 2015

Commencement date: Monday, 12 October 2015

Expiry date: Thursday, 11 October 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 |
|--------------------|---|---|---|
| 81 | Metal Coating: premises on which metal products (excluding vehicles) are sprayed painted, powder coated or enamelled. | 1 000 litres or more per year (powder or paint) | 30 tonnes per annual period |

Conditions

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

Date signed: 8 October 2015

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

Environmental Protection Act 1986 Works Approval: W5888/2015/1 File No: DER2015/001684



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 April until 31 March 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;

'commissioning' means the process of operation and testing that verifies the works and all relevant systems, plant, machinery and equipment have been installed and are performing in accordance with the design specification set out in the works approval application;

'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 W5888/2015/1 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:

Environmental Protection Act 1986 Works Approval: W5888/2015/1 File No: DER2015/001684



| Table 1.2.1: Construction Requirements ¹ | | | | |
|--|-------|-------------------|--|--|
| Document | Parts | Date of Document | | |
| E-Mail – Application 01 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| E-Mail – Application 02 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| E-Mail – Application 03 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| E-Mail – Application 04 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| E-Mail – Application 05 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| E-Mail – Application 06 – Bunbury Powder Coaters – Craige Street | All | 18 July 2015 | | |
| Works Approval Application Form | All | 28 July 2015 | | |
| E-Mail – Commissioning Plan – Bunbury Powder Coaters | All | 07 September 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.

- 1.2.2 The Works Approval Holder shall undertake commissioning in accordance with the commissioning plan 'Commissioning Plan Bunbury Powder Coaters'.
- 1.2.3 The Works Approval Holder shall commission the Bunbury Powder Coating Plant for a period not exceeding three months.

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; and
 - (b) be signed by person authorised to represent the Works Approval Holder and contain the printed name and position of that person within the company.
- 2.1.3 The Works Approval Holder shall submit a commissioning report for the Bunbury Powder Coating Plant, to the CEO within two months of the completion of commissioning.
- 2.1.4 The Works Approval Holder shall ensure the report includes;
 - (a) a summary of the environmental performance of the Bunbury Powder Coating Plant as installed, against the design specification set out in the works approval application;
 - (b) a review of performance against the works approval conditions; and
 - where they have not been met, measures proposed to meet the design specification and/or works approval conditions, together with timescales for implementing the proposed measures.

2.2 Notification

2.2.1 The Works Approval Holder shall ensure that the parameters listed in Table 2.2.1 are notified to the CEO and are in accordance with the notification requirements of the table.

| Table 2.2.1: Notification requirements | | | | | |
|--|-------------------------------|--------------------------|----------------|--|--|
| Condition or table (if relevant) | Parameter | Notification requirement | Format or form | | |
| 1.2.3 | Commencement of commissioning | 7 days prior to start | None | | |
| 1.2.3 | Completion of commissioning | 7 days after completion | specified | | |

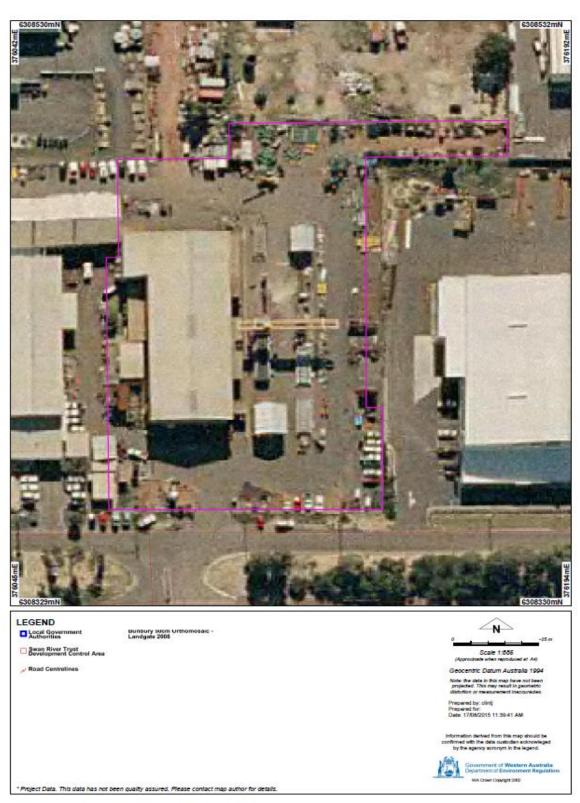
Environmental Protection Act 1986 Works Approval: W5888/2015/1 File No: DER2015/001684



Schedule 1: Maps

Premises map

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





Decision Document

Environmental Protection Act 1986, Part V

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DONNYBROOK WA

ACN: 165 194 552

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Being Lot 100 on Plan 48861

Issue date: Thursday, 8 October 2015

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Decision

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

Decision Document prepared by: Clint Joseph

Licensing Officer

Decision Document authorised by:

Jonathan Bailes

Delegated Officer



Contents

| Dec | cision Document | 1 |
|-----|--|------------------------------|
| Cor | ntents | 2 |
| 1 | Purpose of this Document | 2 |
| 2 | Administrativesummary | Error! Bookmark not defined. |
| 3 | Executive summary of proposal and assessment | 4 |
| 4 | Decision table | 5 |
| 5 | Advertisement and consultation table | 11 |
| 6 | Risk Assessment | 11 |

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 amendment Works Approval ame | | | |
| | Category number(s | capacity | | |
| Activities that cause the premises to become prescribed premises | 81 | 30 tonnes per annum | | |
| prescribed premises | | | | |
| | | | | |
| Application verified | Date: 14/08/2015 | | | |
| Application fee paid | Date: 17/08/2015 | | | |
| Works Approval has been complied with | Yes No | N/A⊠ | | |
| Compliance Certificate received | Yes No | N/A⊠ | | |
| Commercial-in-confidence claim | Yes□ No⊠ | | | |
| Commercial-in-confidence claim outcome | | | | |
| Is the proposal a Major Resource Project? | Yes□ No⊠ | | | |
| Was the proposal referred to the Environmental | | Referral decision No: | | |
| Protection Authority (EPA) under Part IV of the Environmental Protection Act 1986? | Yes□ No⊠ | Managed under Part V□ | | |
| Environmental retodicity to 1990: | | Assessed under Part IV | | |
| | | Ministerial statement No: | | |
| Is the proposal subject to Ministerial Conditions? | Yes□ No⊠ | EPA Report No: | | |
| Does the proposal involve a discharge of waste | Yes□ No⊠ | | | |
| into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)? | r consulted Yes 🗌 No 🖂 | | | |
| Is the Premises within an Environmental Protection Policy (EPP) Area Yes□ No⊠ | | | | |
| Is the Premises subject to any EPP requirements? Yes ☐ No⊠ | | | | |



3 Executive summary of proposal and assessment

Bunbury Powder Coating Pty Ltd has applied for a Works Approval to relocate their powder coating operation to Craigie Road in Davenport.

The works include relocating an existing and operational powder coating plant onto the new premises into an existing building. A new bunded area with sump for spill collection will be constructed. A new abrasive blasting shed and spray painting shed will also be constructed on the premises.

The process consists of the cleaning and preparation of aluminium and steel products to be powder coated. Powder coating is applied electrostatically as a dry powder and then cured under heat and is mainly used for the coating of metal and aluminium.

Removal of oil, dirt, lubrication greases, metal oxides, and welding scale etc. is essential prior to the powder coating process. This is done by a variety of chemical and mechanical methods. Chemical pre-treatments involve the use of phosphates or chromates. This pre-treatment occurs in multiple stages and consist of degreasing, etching, de-smutting, various rinses and the final phosphating or chromating of the substrate. This pre-treatment process also both cleans and improves bonding of the powder to the metal. Painted or rusted metal to be powder coated also needs to be sandblasted in order to remove the old paint and rust.

These processes will take place in spray booth and blasting sheds, both fitted with extraction systems. Dust and over spray discharges are managed through purpose built filtering systems.

The premises is located in an Industrial zoned area. The nearest residential area is over 500m away. No waterways have been identified in the immediate vicinity of the premises.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act1986*, 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 TAE | 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 | W1 | Construction There are no emissions anticipated during construction of the proposed premises. Operation Emission Description Emission: Contaminated stormwater from blasting and metal coating. Impact: Contamination of surrounding land and surface water drainage systems. Potential impacts on ecology of surface water from the addition of suspended solids and heavy metals. Controls: The proponent proposes to have all production within enclosed buildings. Risk Assessment Consequence: Insignificant Likelihood: Possible Risk Rating: Low Regulatory Controls The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Metal Coating) Regulations 2001 and the | Application supporting documentation General provisions of the Environmental Protection Act 1986. Environmental Protection (Metal Coating) Regulations 2001 Environmental Protection (Abrasive Blasting) Regulations 1998. | | |
| | | Environmental Protection (Abrasive Blasting) Regulations 1998. | | | |



| DECISION TAB | LE | | |
|---|--|---|---|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | Residual Risk Consequence Insignificant Likelihood: Unlikely Risk Rating: Low | |
| Premises operation | N/A | Construction and Operation The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Metal Coating) Regulations 2001 and the Environmental Protection (Abrasive Blasting) Regulations 1998. | General provisions of the Environmental Protection Act |
| Emissions general | N/A | Construction and Operation There are no emissions anticipated during construction or operation of the proposed premises that will require monitoring. No works approval conditions are proposed. The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Metal Coating) Regulations 2001 and the Environmental Protection (Abrasive Blasting) Regulations 1998. | Environmental Protection (Metal Coating) Regulations 2001. |
| Point source emissions to air including monitoring | N/A | Construction There are no point source emissions to air anticipated during construction of the proposed premises. Operation Emission Description Emission: Particulate matter (PM) from sandblasting and spraying during operation. Impact: Potential reduction in local air quality potentially below the ambient standard in the National Environmental Protection (Ambient Air Quality) Measure that allows for the adequate protection of human health and well-being. Potential nuisance/annoyance impacts on near-by residences (540m away) due to deposition of dust on property. Controls: The ventilation and extraction system has been designed to prevent paint overspray emissions in accordance with the Environmental Protection (Metal Coating) Regulations 2001, including AS/NZS 4114.1 - Spray painting booths. Abrasive blasting dust will be controlled through a cyclone dust extractor that creates a negative pressure | Environmental Protection (Abrasive Blasting) Regulations 1998 |



| DECISION TAB | LE | | |
|--|--|---|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | in the blasting chamber. Dust is sucked into the dust extractor and move through a number of filters. Powder coating overspray is controlled by a purpose built powder extractor. This extractor sucks the overspray from the powder coating booth into the extractor where the air also passes through filters. Extractors will be regularly maintained according to product specifications. The cyclone extractor will be checked once every 2 months or earlier if warning lights indicate the need for maintenance. The powder extractor is cleaned on a daily basis and pulsated every day to clean the filters. Filters will be sent away annually to be checked for any wear and tear and to be fixed if required. In the event of any systems failure production will be halted until the problem has been fixed. | |
| | | Risk Assessment Consequence: Minor Likelihood: Rare Risk Rating: Low | |
| | | Regulatory Controls The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Metal Coating) Regulations 2001 and the Environmental Protection (Abrasive Blasting) Regulations 1998. | |
| | | Residual Risk Consequence Insignificant Likelihood: Unlikely Risk Rating: Low | |
| Point source emissions to surface water including monitoring | N/A | Construction and Operation: N/A There will be no point source emissions to surface water during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. Licence conditions are therefore not able to be applied. | General provisions of the Environmental Protection Act 1986. |



| DECISION TABL | -E | | |
|--|--|---|---|
| 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 groundwater including monitoring | N/A | Construction and Operation: N/A There will be no point source emissions to groundwater during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. Licence conditions are therefore not able to be applied. | Environmental Protection (Metal Coating) Regulations 2001. |
| Emissions to land including monitoring | N/A | Construction No significant emissions to land are expected from construction of proposed works. Operation Emission Description Emission: Toxic and corrosive chemicals spilling from the dipping tank. Impact: Potential of toxic and corrosive chemicals spilling into the environment and potential harm to human health and well-being. Controls: The dipping tanks will be constructed within a bunded area to contain all spillages. The walls and floor will be impervious to acid attack. The proponent has approval from the Department of Consumer and Employment Protection (DOCEP). Regulatory Controls The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Metal Coating) Regulations 2001 and the Environmental Protection (Abrasive Blasting) Regulations 1998. Residual Risk Consequence Insignificant Likelihood: Unlikely Risk Rating: Low | Environmental Protection (Abrasive Blasting) Regulations 1998 Application supporting documentation |
| Fugitive emissions | N/A | Construction and Operation: N/A There will be no fugitive emissions during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. | Environmental Protection (Metal Coating) |



| DECISION TAI | BLE | | |
|----------------------------------|--|---|---|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Odour | N/A | Construction and Operation: N/A There will be no odour emissions during construction or operation of the premises. Material Safety Data Sheet (MSDS) indicate that the coating powder is odourless. No works approval conditions are proposed. The premises will operate under a registration. | Regulations 2001. Environmental Protection (Unauthorised |
| Noise | N/A | Construction and Operation: Emission Description Emission: Noise from compressors and sandblasting operations. Impact: Potential disturbance/harm to human health and well-being. Controls: Operations takes place within an industrial zone with nearest sensitive receptor 540m away. Compressors will be enclosed with noise reduction sides and noise dampening material. An electrical compressor will be situated within the main building further reducing any possible noise to the outside. Abrasive blasting takes place within an airtight booth. Residual Risk Consequence Insignificant Likelihood: Unlikely Risk Rating: Low Regulatory Controls The premises will operate under a registration. The operational premises will be subject to the Environmental Protection (Noise) Regulations 1997 (Noise Regulations) and General provisions of the Environmental Protection Act 1986. Residual Risk Consequence Insignificant Likelihood: Unlikely Risk Rating: Low | Discharges Regulations, 2004). Environmental Protection (Abrasive Blasting) Environmental Protection (Noise) Regulations 1997 (Noise Regulations) |



| DECISION TABL | .E | | |
|----------------------------------|--|--|---------------------------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Monitoring general | N/A | Construction and Operation: N/A There will be no general monitoring during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. | Application supporting documentation. |
| Monitoring of inputs and outputs | N/A | Construction and Operation: N/A There will be no monitoring of inputs and outputs during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. | |
| Process monitoring | N/A | Construction and Operation: N/A There are no specific impacts requiring process monitoring during construction or operation of proposed works. No works approval conditions are proposed. The premises will operate under a registration. | |
| Ambient quality monitoring | N/A | Construction and Operation: N/A There are no specific impacts requiring ambient quality monitoring during construction or operation of proposed works. No works approval conditions are proposed. The premises will operate under a registration. | |
| Meteorological monitoring | N/A | Construction and Operation: N/A There will be no meteorological monitoring during construction or operation of the premises. No works approval conditions are proposed. The premises will operate under a registration. | |
| Improvements | N/A | Construction and Operation: N/A There are no improvements required during construction or operation of proposed works. No specified conditions are included. | |
| Information | W2 | Conditions W4.1.1 – W4.1.4 requires the submission of compliance and commissioning documentation. Condition W4.2.1 requires notification to DER for the commencement and completion of the three month commissioning period specified in condition W1.2.2. | N/A |
| Works Approval Duration | N/A | The works approval will be issued for a period of three years. | N/A |



5 Advertisement and consultation table

| Date | Event | Comments received/Notes | How comments were taken into consideration |
|------------|---|-------------------------|--|
| 24/08/2015 | Application advertised in West Australian (or other relevant newspaper) | No comment received | N/A |
| 6/10/2015 | Proponent sent a copy of draft instrument | No comment 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 |