



Licence

Environmental Protection Act 1986, Part V

Licensee: CSBP Limited

Licence: L8841/2014/1

Registered office: CSBP Limited
Wesfarmers House
40 The Esplanade
PERTH WA 6000

ACN: 008 668 371

Premises address: CSBP Limited
280 North West Coastal Highway
WEBBERTON WA 6530
Being Lot 103 on Plan 35689 and Lot 105 on Diagram 26864 as depicted in Schedule 1.

Issue date: Thursday, 27 November 2014

Commencement date: Monday, 01 December 2014

Expiry date: Saturday, 30 November 2019

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
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 into the environment.	500 tonnes or more per annual period	507 000 tonnes per annual period

Conditions

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

Date signed: 15 October 2015

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



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

CSBP and its subsidiaries and joint ventures form the chemicals and fertilisers business units of WesCEF, which is a division of Wesfarmers Limited. The Western Australian business primarily produces agricultural fertilisers, ammonia, ammonium nitrate, sodium cyanide and other industrial chemicals.

CSBP Geraldton Depot was commissioned in the late 1930s. Its primary purpose was to supply the growing need of local farmers for superphosphate and superphosphate based products. At this time the depot consisted of a sulphuric acid plant, superphosphate manufacture plant, and fertiliser storage and despatch facilities. Imported sulphur and phosphate rock were the principal raw materials utilised at the depot. Superphosphate production peaked at 100 000 tonnes per annum (tpa) in the mid 1970s. However, by 2002 the demand for superphosphate and its derivatives reduced to 25 000 tpa, in favour of nitrogen based fertilisers. Consequently, the Geraldton Depot's sulphuric acid and superphosphate manufacturing facilities were decommissioned in January 1999.

Currently at CSBP Geraldton Depot, the storage and dispatch facilities remain operational, with fertiliser being imported via the Geraldton Port, or transferred by road from the company's manufacturing facility in Kwinana, Western Australia. CSBP Geraldton Depot encompasses 33.6 hectares.

Current on-site activities include the receipt, storage and dispatch of granular fertilisers, the manufacture and dispatch of liquid fertiliser, and the receipt of industrial wash water (a controlled waste) from fertiliser import activities at the Geraldton Port. The wash water contains chromium. CSBP Geraldton Depot receives granular fertiliser and liquid products for the purpose of blending and/or mixing. The nominated rate of throughput of solid fertiliser is approximate 101 000 tonnes per annum and approximately 20 000 tonnes per annum of liquid fertiliser. The nominated throughput of liquid waste from the Geraldton Port is approximately 8 tonnes per annum.

CSBP Geraldton Depot was classified as "contaminated – remediation required" on 11 July 2008, based on the presence of lead levels in soils exceeding DER human health investigation levels for industrial land-use, and elevated metals and nutrients in groundwater beneath the site. A detailed site investigation (DSI) was submitted to DER in June 2012.

There are no naturally occurring surface water bodies such as rivers, lakes or wetlands on the site. The depth to groundwater is approximately 8 metres Below Ground Level (mBGL) to the Superficial Swan Aquifer, overlaying the Cattamarra Coal Measures North Aquifer. The groundwater flows in a west to south west direction towards the Indian Ocean.

Surrounding land use within 500m of the site includes residential, light industrial and general industrial areas. The nearest residential area is opposite the site (across the North-West Coastal Highway) and is approximately 400m from the despatch area. The site retains a large proportion of well-established native vegetation on the site to provide a buffer between the site activities and surrounding premises.



The Licensee has in place an Environmental Management System (EMS), which is consistent with the international standard ISO14001. The Licensee has an established environmental policy, with an incident management reporting system, legal register, risk assessment process, and monitoring and auditing programs that aim to manage the key environmental aspects associated with CSBP Geraldton Depot.

This Licence is the result of an amendment sought by the Licensee to update waste acceptance, stormwater management, and monitoring requirements.

The licences and works approvals issued for the Premises are:

Instrument log		
Instrument	Issued	Description
L8841/2014/1	01/12/2014	New application
L8841/2014/1	15/10/2015	Proponent amendment and update to current DER template

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 April until 31 March in the following year;

‘**AS/NZS 5667.1**’ means 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 5667.10**’ means the Australian Standard AS/NZS 5667.10 *Water Quality – Sampling – Guidance on sampling of waste waters*;

‘**AS/NZS 5667.11**’ means the Australian Standard AS/NZS 5667.11 *Water Quality – Sampling – Guidance on sampling of groundwaters*;

‘**averaging period**’ means the time over which a limit 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*;

‘freeboard’ means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point.

‘hardstand’ means an impermeable surface;

‘Licence’ means this Licence numbered L8841/2014/1 and issued under the Act;

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

‘NATA’ means the National Association of Testing Authorities, Australia;

‘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;

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

‘quarterly’ means the 4 inclusive periods from 1 April to 30 June, 1 July to 30 September, 1 October to 31 December and in the following year, 1 January to 31 March;

‘Schedule 1’ means Schedule 1 of this Licence unless otherwise stated;

‘Schedule 2’ means Schedule 2 of this Licence unless otherwise stated;

‘spot sample’ means a discrete sample representative at the time and place at which the sample is taken;

‘usual working day’ means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia; and

‘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.

- 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 version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.
- 1.1.5 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:
- (a) pollution;
 - (b) unreasonable emission;
 - (c) discharge of waste in circumstances likely to cause pollution; or
 - (d) being contrary to any written law.



1.2 General conditions

- 1.2.1 The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.
- 1.2.2 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.
- 1.2.3 The Licensee shall:
- (a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and
 - (b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.¹

Note1: *The Environmental Protection (Unauthorised Discharges) Regulations 2004* make it an offence to discharge certain materials into the environment.

1.3 Premises operation

- 1.3.1 The Licensee shall only accept waste onto the Premises if:
- (a) it is of a type listed in Table 1.3.1;
 - (b) the quantity accepted is below any quantity limit listed in Table 1.3.1; and
 - (c) it meets any specification listed in Table 1.3.1.

Table 1.3.1: Waste acceptance

Waste	Waste Code	Quantity Limit	Specification ¹
Industrial wash water contaminated with a controlled waste	L150	< 100 tonnes per annual period	Industrial wash water waste derived from CSBP activities at Geraldton Port

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

- 1.3.2 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 1.3.2 and in accordance with any process limits described in that table.

Table 1.3.2: Waste processing and containment infrastructure

Waste	Waste Code	Process ¹	Process limits ¹
Industrial wash water contaminated with a controlled waste.	L150	Receipt, handling, consolidation, and temporary storage prior to reuse in the liquid fertiliser process	Only to be receipted, consolidated, stored, and handled within a bunded hardstand area capable of preventing surface run-off from entering the environment

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

- 1.3.3 The Licensee shall ensure that stormwater not entering into one of the six unlined soaks on site is stored within vessels or compounds provided with the infrastructure detailed in Table 1.3.3.

Table 1.3.3 Stormwater containment infrastructure

Vessel or compound	Material	Requirements
Pond 1	Stormwater only	Concrete lined
Pond 2	Stormwater only	HDPE lined
Roof Tank	Stormwater only	Steel Tank
Concrete Tank	Stormwater only	Concrete Tank
Fibre Glass Tank	Stormwater only	Fibre Glass Tank



- 1.3.4 The Licensee shall manage all stormwater ponds so that:
- (a) overtopping of the ponds does not occur;
 - (b) a freeboard equal to, or greater than, 300mm is targeted;
 - (c) the integrity of the containment infrastructure is maintained; and
 - (d) vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments.

2 Emissions

2.1 Emissions to land

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

Table 2.1.1: Emissions to land			
Emission point reference and location on Map of emission points	Emission point	Description	Source including abatement
L1	Discharge from Pond 1 to infiltration area	Emergency overflow discharge of stormwater to infiltration area is only authorised when the stormwater storage capacity is exhausted	Stormwater from Pond 1
Soaks 1-6	Discharge of potentially contaminated stormwater to land via unlined soak	Discharge of stormwater to unlined soak	Stormwater from premises footprint

3 Monitoring

3.1 General monitoring

- 3.1.1 The licensee shall ensure that:
- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1 unless indicated otherwise in the relevant table;
 - (b) all wastewater sampling is conducted in accordance with AS/NZS 5667.10;
 - (c) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and
 - (d) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured unless indicated otherwise in the relevant table.
- 3.1.2 The Licensee shall ensure that:
- a) quarterly monitoring is undertaken at least 45 days apart; and
 - b) annual monitoring is undertaken at least 9 months apart.
- 3.1.3 The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.
- 3.1.4 The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.



3.2 Monitoring of emissions to land

3.2.1 The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.

Table 3.2.1: Monitoring of emissions to land				
Monitoring point reference	Parameter ³	Unit	Averaging Period	Frequency
Pond 1	pH ¹ Aluminium (Al) Ammoniacal Nitrogen (NH ₃ -N) ² Chromium (Cr) Copper (Cu) Lead (Pb) Magnesium (Mg)	-	Spot sample	Annual and within 48 hours of a discharge to the emergency overflow infiltration area
Soaks 1-6	Manganese (Mn) Potassium (K) Sulphur (S) Sulphate (SO ₄) Total Dissolved Solids (TDS) Total Nitrogen (TN) Total Recoverable Hydrocarbon Total Phosphorus (TP) ² Zinc (Zn)	mg/L		Monthly when flowing

Note 1: In-situ non-NATA accredited analysis permitted

Note 2: Alternative sample preservation and storage standard permitted

Note 3: All metals to be analysed as total metals

3.3 Monitoring of inputs and outputs

3.3.1 The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.

Table 3.3.1: Monitoring of inputs and outputs		
Input/Output	Units	Averaging period
Granular fertiliser	Tonnes	Annual
Liquid fertiliser	Tonnes	Annual

3.4 Ambient environmental quality monitoring

3.4.1 The Licensee shall undertake the monitoring in Table 3.4.1 and according to the specifications in that table.



Table 3.4.1: Monitoring of ambient groundwater quality

Monitoring point reference and location on Map of monitoring locations	Parameter ³	Units	Averaging period	Frequency
Monitoring bores: MB02 or MB02A MB06 MB07 MB08 MB10	Standing Water Level (SWL) ¹	m(AHD)	Spot sample	Quarterly when samples are available
	pH ¹	-		
	Aluminium (Al)	mg/L		
	Ammoniacal Nitrogen (NH ₃ -N) ²			
	Chromium (Cr)			
	Copper (Cu)			
	Iron (Fe)			
	Lead (Pb)			
	Potassium (K)			
	Sulphur (S)			
	Sulphate (SO ₄)			
	Total Nitrogen (TN)			
	Total Phosphorus (TP) ²			
Zinc (Zn)				

Note 1: In-situ non-NATA accredited analysis permitted

Note 2: Alternative sample preservation and storage standard permitted

Note 3: All metals to be analysed as dissolved metals

4 Improvements

4.1.1 The Licensee shall complete the improvements in Table 4.1.1 by the date of completion in Table 4.1.1.

4.1.2 The Licensee, for improvements not specifically requiring a written submission, shall write to the CEO stating whether and how the Licensee is compliant with the improvement within one week of the completion date specified in Table 4.1.1.

Table 4.1.1: Improvement program

Improvement reference	Improvement	Date of completion
IR1	The Licensee shall prepare and submit to the CEO an Environmental Improvement Plan (EIP). The EIP shall include but not be limited to an assessment of all on-site stormwater infrastructure (drainage network, ponds, soaks, storage tanks), and actions to contain all stormwater that may be contaminated	30/10/2015



5 Information

5.1 Records

- 5.1.1 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 5.1.1(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.
- 5.1.2 The Licensee shall ensure that:
- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
 - (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.
- 5.1.3 The Licensee shall complete an Annual Audit Compliance Report (AACR) 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.
- 5.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

5.2 Reporting

- 5.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 60 calendar days after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.

Table 5.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form ¹
-	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 1.3.1	Quantity of waste acceptance	None specified
Table 3.2.1	Monitoring of emissions to land	LR1
Table 3.3.1	Inputs and outputs	None specified
Table 3.4.1	Ambient groundwater monitoring	AGWQ1
5.1.3	Compliance	AACR
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

- 5.2.2 The Licensee shall ensure that the Annual Environmental Report also contains an assessment of the information contained within the report against previous monitoring results.



- 5.2.3 The Licensee shall submit the information in Table 5.2.2 to the CEO according to the specifications in that table.

Table 5.2.2: Non-annual reporting requirements				
Condition or table (if relevant)	Parameter	Reporting period	Reporting date (after end of the reporting period)	Format or form
-	Copies of original monitoring reports submitted to the Licensee by third parties	Not Applicable	Within 14 days of the CEOs request	As received by the Licensee from third parties

5.3 Notification

- 5.3.1 The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the CEO in accordance with the notification requirements of the table.

Table 5.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement ¹	Format or form
1.3.3	An overflow of Pond 1 to the infiltration area	As soon as practicable but no later than 5pm of the next usual working day	-

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act



Schedule 1: Maps

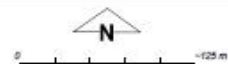
Premises map

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



LEGEND

Geraldton 10cm Orthomosaic -
Landgate 2006
Geraldton Townsite 10cm
Orthomosaic - Landgate
2007



Scale 1:4200
(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: natchiv
Prepared for:
Date: 17/11/2014 2:39:53 PM

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



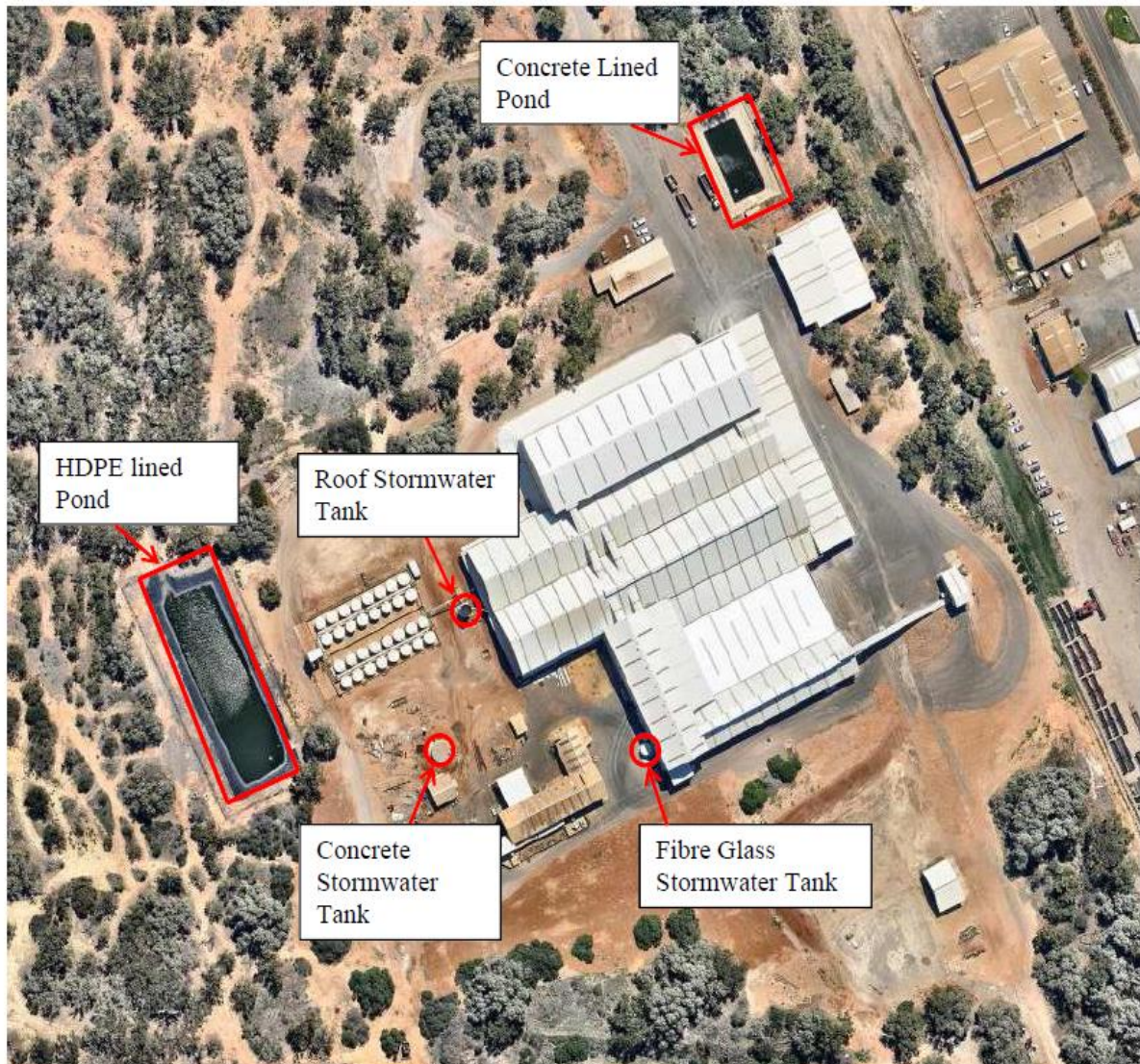
Government of Western Australia
Department of Environment Regulation
WA Crown Copyright 2002

* Project Data. This data has not been quality assured. Please contact map author for details.



Map of storage locations

The locations of the storage areas defined in Table 1.3.3 are shown below.





Map of emission points

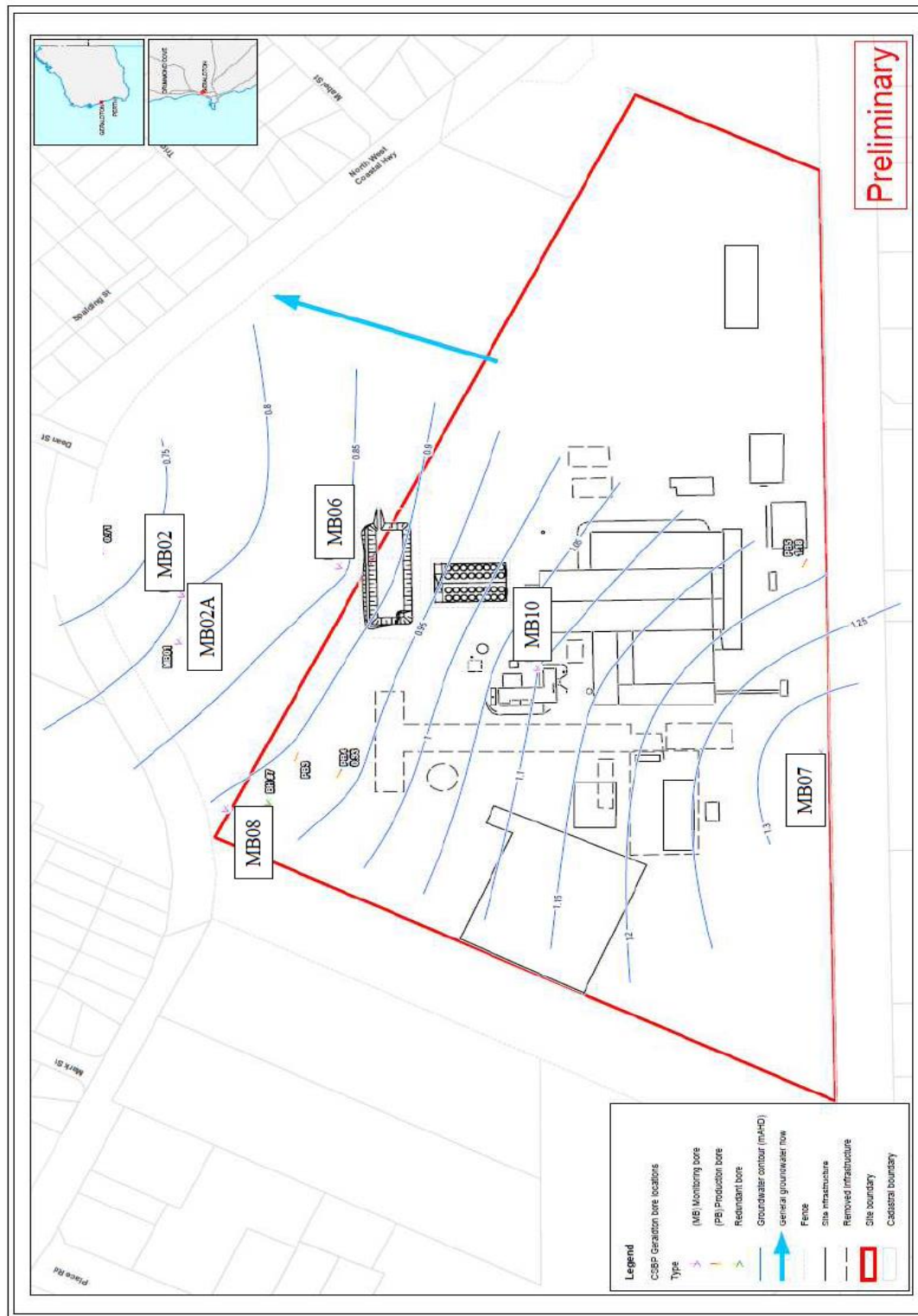
The locations of the emission points defined in Table 2.1.1 are shown below.





Map of monitoring locations

Location of ambient groundwater monitoring points defined in table 3.4.1.





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: Trading as:	ABN:
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 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?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the non compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):	
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:



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: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____

SEAL (if signing under seal)

SIGNATURE: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____

Licence: L8841/2014/1
Form: LR1
Name: Monitoring of emissions to land

Licensee: CSBP Limited
Period :

Monitoring point reference	Parameter	Result	Averaging Periods	Method	Sample date & times
Pond 1 Soaks 1-6	pH		Spot sample		
	Aluminium (Al)	mg/L			
	Ammoniacal Nitrogen (NH3-N)	mg/L			
	Chromium (Cr)	mg/L			
	Copper (Cu)	mg/L			
	Lead (Pb)	mg/L			
	Magnesium (Mg)	mg/L			
	Manganese (Mn)	mg/L			
	Potassium (K)	mg/L			
	Sulphur (S)	mg/L			
	Sulphate (SO ₄)	mg/L			
	Total Dissolved Solids (TDS)	mg/L			
	Total Nitrogen (TN)	mg/L			
	Total Recoverable Hydrocarbon	mg/L			
	Total Phosphorus (TP)	mg/L			
	Zinc (Zn)	mg/L			

Signed on behalf of CSBP Limited: Date:

Licence: L8841/2014/1
 Form: AGWQ1
 Name: Ambient groundwater quality monitoring

Licensee: CSBP Limited
 Period :

Monitoring point reference	Parameter	Result	Averaging Periods	Method	Sample date & times
Monitoring bores: MB02 or MB02A MB06 MB07 MB08 MB10	Standing Water Level (SWL)	m(AHD)	Spot sample		
	pH	-			
	Aluminium (Al)	mg/L			
	Ammoniacal Nitrogen (NH ₃ -N)	mg/L			
	Chromium (Cr)	mg/L			
	Copper (Cu)	mg/L			
	Iron (Fe)	mg/L			
	Lead (Pb)	mg/L			
	Potassium (K)	mg/L			
	Sulphur (S)	mg/L			
	Sulphate (SO ₄)	mg/L			
	Total Nitrogen (TN)	mg/L			
	Total Phosphorus (TP)	mg/L			
	Zinc (Zn)	mg/L			

Signed on behalf of CSBP Limited: Date:



Decision Document

Environmental Protection Act 1986, Part V

Proponent: CSBP Limited

Licence: L8841/2014/1

Registered office: CSBP Limited
Wesfarmers House
40 The Esplanade
PERTH WA 6000

ACN: 008 668 371

Premises address: CSBP Limited
280 North West Coastal Highway
WEBBERTON WA 6530
Being Lot 103 on Plan 35689 and Lot 105 on Diagram 26864

Issue date: Thursday, 27 November 2014

Commencement date: Monday, 01 December 2014

Expiry date: Saturday, 30 November 2019

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



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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the Environmental Protection Act 1986. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s) 33	Assessed design capacity 507 000 tonnes per annual period
Application verified	Date: 03/09/2014	
Application fee paid	Date: 30/09/2014	
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 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

CSBP and its subsidiaries and joint ventures form the chemicals and fertilisers business units of WesCEF, which is a division of Wesfarmers Limited.

Current on-site activities include the receipt, storage and dispatch of granular fertilisers, the manufacture and dispatch of liquid fertiliser, and the receipt of industrial wash water (a controlled waste) from fertiliser import activities at the Geraldton Port. The wash water contains chromium. CSBP Geraldton Depot receives granular fertiliser and liquid products for the purpose of blending and/or mixing. The nominated rate of throughput of solid fertiliser is approximate 101 000 tonnes per annum and approximately 20 000 tonnes per annum of liquid fertiliser. The nominated throughput of liquid waste from the Geraldton Port is approximately 8 tonnes per annum.

CSBP Geraldton Depot was classified as “contaminated – remediation required” on 11 July 2008, based on the presence of lead levels in soils exceeding DER human health investigation levels for industrial land-use, and elevated metals and nutrients in groundwater beneath the site. A detailed site investigation (DSI) was submitted to DER in June 2012.

There are no naturally occurring surface water bodies such as rivers, lakes or wetlands on the site. The depth to groundwater is approximately 8 metres Below Ground Level (mBGL) to the Superficial Swan Aquifer, overlaying the Cattamarra Coal Measures North Aquifer. The groundwater flows in a west to south west direction towards the Indian Ocean.

Surrounding land use within 500m of the site includes residential, light industrial and general industrial areas. The nearest residential area is opposite the site (across the North-West Coastal Highway) and is approximately 400m from the despatch area. The site retains a large proportion of well-established native vegetation on the site to provide a buffer between the site activities and surrounding premises. The Licensee has in place an Environmental Management System (EMS), which is consistent with the international standard ISO14001. The Licensee has an established environmental policy, with an incident management reporting system, legal register, risk assessment process, and monitoring and auditing programs that aim to manage the key environmental aspects associated with CSBP Geraldton Depot.

This Licence is the result of an amendment sought by the Licensee to update waste acceptance, stormwater management, and monitoring requirements.



4 Decision table

All applications are assessed under the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, DER's Corporate Policy Statement No.7 – Operational Risk Management and the risk matrix attached to this Decision Document in Section 6. Where other references have been used in making the decision they are detailed in the decision table.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Premises operation	L1.3.1 and L1.3.2	Tables 1.3.1 and 1.3.2 have been updated to clarify the type and specifications of waste accepted at the facility.	Application supporting documentation
Emissions to land including monitoring	L2.2.1 and L3.2.1	<p>Emission Description Emission: Contaminated and potentially contaminated stormwater discharged to infiltration area through an emergency overflow from storage Pond 1. Direct discharges to land via unlined soaks 1-6. Impact: Potential contamination of land and groundwater. Controls: Water is pumped from Pond 1 to Pond 2 to prevent the use of the overflow to the infiltration area. Management of potentially contaminated stormwater is currently being investigated through the site's improvement programme.</p> <p>Risk Assessment Consequence: Insignificant Likelihood: Likely Risk Rating: Moderate</p> <p>Regulatory Controls Condition 1.3.3 has been updated to reflect that potentially contaminated stormwater can enter the unlined soaks. Improvement condition 4.1.1 IR1 remains on the licence requiring the Licensee to prepare Environmental Improvement Plan (EIP) for stormwater management.</p> <p>Monitoring requirements have been updated to reflect the fact that monthly samples of the water discharging to soaks cannot be taken if there is no</p>	<p>General provisions of the <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>flow (i.e. no rainfall) and if flow occurs less than 15 days apart in 2 adjacent months. The suite of parameters to be tested has also been reviewed. Based on the reported data, some tested parameters are consistently below the limit of reporting. DER therefore deems it appropriate to amend condition L3.2.1 and is satisfied that the changes will not have a negative impact on the environment.</p> <p>Residual Risk Consequence: Insignificant Likelihood: Likely Risk Rating: Moderate</p>	
Fugitive emissions	N/A	<p>Emission Description Emission: Fertiliser dust which is deposited into a below-ground hopper area that is covered by a structure with a roof and two closed sides. The product is then transported into the shed via a conveyor. Dust is generated whilst the product is deposited into the below-ground hopper. This area is close to the site boundary (less than 20m) and borders onto a light industrial area. Dust is also likely to be generated from the conveyors, rock bin and superbin areas. The nearest residential area is 400m away from the despatch area.</p> <p>Impact: Potential contamination of land and groundwater, and nuisance impacts to off-site receptors.</p> <p>Controls: Road sweepers to clear dust. Well-established native vegetation acting as a buffer. CSBP incorporates a Dust Management Plan (DMP) to identify and mitigate any generated dust</p> <p>Risk Assessment Consequence: Insignificant Likelihood: Possible Risk Rating: Moderate</p>	<p>General provisions of the <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><u>Regulatory Controls</u> DER is satisfied that appropriate controls are in place to prevent and minimise fugitive emissions and therefore deems it appropriate to remove condition L2.6.1 relating to fugitive dust emissions from the operating licence. Provisions of the <i>Environmental Protection Act 1986</i> are sufficient to regulate this impact.</p> <p><u>Residual Risk</u> Consequence: Insignificant Likelihood: Possible Risk Rating: Low</p>	
Ambient quality monitoring	L3.4.1	<p><u>Emission Description</u> Emission: Contaminated groundwater. Impact: Potential contamination of stock and/or bore water source. Controls: Water is pumped from Pond 1 to Pond 2 to prevent the use of the overflow to the infiltration area. Road sweepers are used to clear dust which can pollute rainwater. Ambient groundwater monitoring programme.</p> <p><u>Risk Assessment</u> Consequence: Insignificant Likelihood: Likely Risk Rating: Moderate</p> <p><u>Regulatory Controls</u> Based on the reported data, some tested parameters for groundwater are consistently below the limit of reporting. DER therefore deems it appropriate to amend condition 3.4.1 and is satisfied that the removal of certain parameters and a decrease in the frequency of monitoring to quarterly will not have a negative impact on the environment. Monitoring location MB01 has also been removed as it does not exist. MB02 is actually a nested</p>	General provisions of the <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>installation with a deep and shallow bore (MB02 and MB02A). Sampling occurs from the most relevant bore depending on groundwater level at the time of sampling.</p> <p>Residual Risk Consequence: Insignificant Likelihood: Likely Risk Rating: Moderate</p>	
Improvements	L4.1.1	Condition L4.1.1 has been amended by removing IR2, IR3 and IR4 which have been completed within the required timeframes.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
21/09/2015	Proponent sent copy of draft amended licence	Signed 21 day waiver form received	N/A

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