



Government of **Western Australia**
Department of **Environment Regulation**

Your ref L5982/1994/11
Our ref 2011/011415
Enquiries Jessica French
Phone 9333 7524
Fax 9333 7550
Email Jessica.french@der.wa.gov.au

Mr Michael Southwell
Director
Jetstar Enterprises Pty Ltd
PO Box 127
MUNDIJONG WA 6123

Dear Mr Southwell

ENVIRONMENTAL PROTECTION ACT 1986: LICENCE GRANTED

Premises:

Permapole
394 Robertson Road CARDUP WA 6122

Licence Number: L5982/1994/11

A licence under the *Environmental Protection Act 1986* (the Act) has been granted for the above premises. The Department of Environment Regulation will advertise the issuing of this licence in the public notices section of *The West Australian* newspaper.

The licence includes attached conditions. Under section 58(1) of the Act, it is an offence to contravene a condition of a licence. This offence carries a penalty of up to \$125,000 and a daily penalty of up to \$25,000.

In accordance with section 102(1)(c) of the Act, you have 21 days to appeal the conditions of the licence. Under section 102(3)(a) of the Act, any other person may also appeal the conditions of the licence. To lodge an appeal, contact the Office of the Appeals Convenor on 6467 5190 or by email at admin@appealsconvenor.wa.gov.au.

Where a licence is issued for more than one year it requires payment of an annual fee and will cease to have effect if the fee is unpaid. It is the occupier's responsibility to lodge a fee application and pay the annual fee in sufficient time to avoid incurring a late payment fee and for processing to be completed before the licence anniversary date.

If you have any queries regarding the above information, please contact Jessica French on 9333 7510.

Yours sincerely

Ed Schuller
Officer delegated under section 20
of the *Environmental Protection Act 1986*

Thursday, 25 September 2014

The Atrium, 168 St Georges Terrace, Perth WA 6000
Phone (08) 6467 5000 Fax (08) 6467 5562
Postal Address: Locked Bag 33, Cloisters Square, Perth WA 6850
www.der.wa.gov.au



Licence

Environmental Protection Act 1986, Part V

Licensee: Jetstar Enterprises Pty Ltd

Licence: L5982/1994/11

Registered office: Level 2, 35-37 Havelock Street
WEST PERTH WA 6005

ACN: 098 804 436

Premises address: Permapole
394 Robertson Road
CARDUP WA 6122
Being Part of Lot 60 on Diagram 59263 as depicted in Schedule 1.

Issue date: Thursday, 25 September 2014

Commencement date: Monday, 29 September 2014

Expiry date: Saturday, 28 September 2019

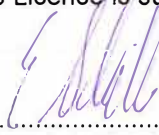
Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved Premises production or design capacity
29	Timber preserving: premises on which timber is preserved for commercial purposes by the use of chemicals.	Not applicable	15,000 tonnes per annual period

Conditions

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


.....
Officer delegated under section 20
of the *Environmental Protection Act 1986*



Contents

Licence	1
Contents	2
Introduction	2
Licence conditions	5
1 General	5
2 Emissions	8
3 Monitoring	9
4 Improvements	10
5 Information	11
Schedule 1: Maps	13
Schedule 2: Reporting & notification forms	14

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.

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

Jetstar Enterprises Pty Ltd is the licensee for the Permapole timber preservation plant located at 394 Robertson Rd Cardup.

The plant was established in 1978 by Bunnings. Jetstar Enterprises Pty Ltd purchased the business in 2003 and has been the licence holder since then.

Permapole receives raw pine logs from pine plantations. The raw pine logs are stored on a "log landing" area where they are kept damp via irrigation to ensure that the timber does not splinter during debarking. The run-off from the log landing is currently discharged from the premises via an open drainage line connected to a sediment basin. The run-off has been a source of contention for the premises as it is discoloured and has the potential to be odourous. The irrigation system is connected to a timer system which is set so that minimal run-off is produced. Furthermore a procedure for preventing water run-off will be developed by the end of November 2014 and a drainage intercept and water return for water re-use will be constructed by the end of January 2015.

The logs are then debarked by debarking machinery. It is then sent through another machine to smooth and round the logs and cut them to size. The saw dust and pine bark is sold off for various uses such as garden products and animal bedding.

The logs are then sent to a pressure cylinder for copper chrome arsenate (CCA) treatment. The CCA concentrate is stored in a double skinned tank which is licenced by the Department of Mines and Petroleum. The concentrate is diluted with recycled water from the sites dam and bore water as required. The diluted solution is pumped into the pressure cylinder containing the logs and CCA enters the cells of the wood. The process takes about 10 minutes. Once the treatment is complete, excess solution is pumped out of the cylinder and into a tank. The treated timber is stored on a concrete bunded hardstand, covered by a roof until it has cured and CCA fixation has occurred. The process is weather dependant, with a minimum fixation period of 7 days.

The cured timber is stored in the yard. During rainfall events, there is a potential for run-off to become contaminated with CCA, therefore the storage yard contains drainage lines to ensure that any potentially contaminated run-off enters the sites lined secondary containment pond. The level of the pond water is checked daily and when it appears to be reaching capacity, its contents are treated with lime and ferrous sulphate hepta which adjusts the pH and drops the metals out of the water column. The water quality is then tested by a NATA accredited laboratory and if it meets the discharge criteria set in the DER licence, it is discharged offsite into the councils open drainage line.



This Licence is the successor to licence L5982/1994/10 and includes changes to the conditions, so that the licence conforms to DER's new licensing format and it includes additional conditions in relation to the implementation of the sites Environmental Action Plan dated 4 August 2014.

The licences and works approvals issued for the Premises since 30 September 2003 are:

Instrument log		
Instrument	Issued	Description
L5982/1994/7	30/09/2003	Licence re-issue
L5982/1994/8	01/10/2004	Licence re-issue
L5982/1994/9	06/09/2005	Licence re-issue
L5982/1994/9	29/11/2007	Administrative amendment
L5982/1994/10	10/09/2009	Licence re-issue
L5982/1994/11	25/09/2014	Licence re-issue, review and conversion to REFIRE format

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 29 September until 28 September 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 5667.4' means the Australian Standard AS/NZS 5667.4 *Water Quality – Sampling – Guidance on sampling from lakes, natural and man-made*;

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

'AS/NZS 5667.12' means the Australian Standard AS/NZS 5667.12 *Water Quality – Sampling – Guidance on sampling of bottom sediments*;

'averaging period' means the time over which a limit or target is measured or a monitoring result is obtained;

'CCA' means mixtures containing copper chromium and arsenate compounds;

'CCA Treatment Area' means the area defined in Schedule 1;

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

'CEO' for the purpose of correspondence means;

Manager Licensing (Greater Swan)
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850
Telephone: (08) 9333 7510
Facsimile: (08) 9333 7550
Email: grswanbooragoon@der.wa.gov.au;

'code of practice for the storage and handling of dangerous goods' means the document titled "Storage and handling of dangerous goods: Code of Practice" published by the Department of Mines and Petroleum, as amended from time to time;

'controlled waste' has the definition in *Environmental Protection (Controlled Waste) Regulations 2004*;



'dangerous goods' has the meaning defined in the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*;

'environmentally hazardous material' means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm. Note: Environmentally hazardous materials include dangerous goods where they are stored in quantities below placard quantities. The storage of dangerous goods above placard quantities is regulated by the Department of Mines and Petroleum;

'fugitive emissions' means all emissions not arising from point sources identified in sections 2.6, 2.7 and 2.8;

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

'Licence' means this Licence numbered L5982/1994/11 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;

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

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

'spot sample' means a discrete sample representative at the time and place at which the sample is taken.

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.

1.2 General conditions

1.2.1 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.

1.2.2 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.

1.2.3 The Licensee, except where storage is prescribed in section 1.3, shall ensure that environmentally hazardous materials are stored in accordance with the code of practice for the storage and handling of dangerous goods.



1.2.4 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.

1.2.5 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.

1.2.6 The Licensee shall maintain permanent markers along the boundary of the Premises so it can be identified on the ground.

1.3 Premises operation

1.3.1 The Licensee shall ensure that waste material is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.1.

Table 1.3.1: Containment infrastructure		
Storage vessel or compound	Material	Requirements
Secondary Containment Pond	Contaminated and potentially contaminated stormwater from the CCA Treatment Area and Treated Log Stockpile Area	Synthetic lined and designed to capture a 1 in 10 ARI rainfall event.

1.3.2 The Licensee shall manage all containment ponds such that:

- (a) overtopping of the ponds does not occur; and
- (b) the integrity of the containment infrastructure is maintained;

1.3.3 The Licensee shall ensure that where wastes produced on the Premises are not taken off-site for lawful use or disposal, they are managed in accordance with the requirements in Table 1.3.2.

Table 1.3.2: Management of Waste		
Waste type	Process	Management requirements
CCA solutions	Chemical fixation hardstand areas including the trolley siding area, curing shed and covered holding shed	CCA solutions are directed back to the collection sump via the graded concrete floor.
Wastewater	Log Wetting area	Wastewater to be retained onsite after 31 January 2015.
Contaminated and potentially contaminated stormwater	Treated timber storage	Directed to Secondary Containment Pond



2 Emissions

2.1 General

- 2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit or target specified in any part of section 2 of this Licence.

2.2 Point source emissions to air

There are no specified conditions relating to point source emissions to air in this section.

2.3 Point source emissions to surface water

- 2.3.1 The Licensee shall ensure that where waste is emitted to surface water from the emission points in Table 2.3.1 and identified on the map of emission points in Schedule 1; it is done so in accordance with the conditions of this Licence.

Table 2.3.1: Emission points to surface water

Emission point reference and location on Map of emission points	Description	Source including abatement
W1	Portable pump for discharging water from the Secondary containment pond to the Shire's open drain to the west of the premises	Contaminated or potentially contaminated stormwater and runoff from the treated timber storage area which is chemically treated to meet the emission limit specified in table 2.3.2 prior to discharge

- 2.3.2 The Licensee shall not cause or allow point source emissions to surface water that do not meet the limits listed in Table 2.3.2.

Table 2.3.2: Point source emission limits to surface water

Emission point reference	Parameter	Limit (including units)	Averaging period
W1	pH	Between 6.5 - 8.5	Spot sample
	copper	<0.2 mg/L	
	arsenic	<0.013 mg/L	
	chromium	<0.01 mg/L	

2.4 Point source emissions to groundwater

There are no specified conditions relating to point source emissions to groundwater in this section.

2.5 Emissions to land

There are no specified conditions relating to emissions to land in this section.

2.6 Fugitive emissions

- 2.6.1 The Licensee shall use all reasonable and practical measures to prevent and where that is not practicable to minimise dust emissions from the Premises.



2.7 Odour

- 2.7.1 The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.

2.8 Noise

There are no specified conditions relating to noise in this section.

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;
 - (b) all surface water sampling is conducted in accordance with AS/NZS 5667.4;
 - (c) all wastewater sampling is conducted in accordance with AS/NZS 5667.10;
 - (d) all sediment sampling is conducted in accordance with AS/NZS 5667.12;
 - (e) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured.
- 3.1.2 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.

3.2 Monitoring of point source emissions to air

There are no specified conditions relating to monitoring of point source emissions to air in this section.

3.3 Monitoring of point source emissions to surface water

- 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 point source emissions to surface water				
Emission point reference	Monitoring site	Parameter	Units	Frequency
W1	Surface and At depth	Date of discharge	-	Prior to each discharge event
		Volume of water discharged	Litres or m ³	
		pH	-	
		Copper (total)	mg/L	
		Arsenic (dissolved)		
		Chromium (total)		
		Hexavalent chromium (dissolved)		
		Total dissolved solids		
		Total suspended solids		

3.4 Monitoring of point source emissions to groundwater

There are no specified conditions relating to monitoring of point source emissions to groundwater in this section.



3.5 Monitoring of emissions to land

There are no specified conditions relating to monitoring of emissions to land in this section.

3.6 Monitoring of inputs and outputs

There are no specified conditions relating to monitoring of inputs and outputs in this section.

3.7 Process monitoring

There are no specified conditions relating to process monitoring in this section.

3.8 Ambient environmental quality monitoring

There are no specified conditions relating to ambient environmental quality monitoring in this section.

3.9 Meteorological monitoring

There are no specified conditions relating to meteorological monitoring in this section.

4 Improvements

4.1 Improvement program

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 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 undertake the actions specified in the document "Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, 4 August 2014".	As specified in the document dated 4 August 2014
IR2	The Licensee shall install permanent markers along the boundary of the Premises so it can be identified on the ground.	1/01/2015



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 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 28 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
-	Receipts obtained for the removal of any controlled wastes from the premises	None specified
-	Copies of original monitoring reports submitted to the Licensee by third parties	As received by the Licensee from third parties
Table 3.3.1	Date of discharge, volume of water discharged, pH, copper (total), arsenic (dissolved), chromium (total) and hexavalent chromium (dissolved)	WR1
5.1.3	Compliance	Annual Audit Compliance Report (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 and Licence limits.

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 ²
2.1.1	Breach of any limit specified in the licence	Part A: As soon as practicable but no later than 5pm of the next usual working day.	N1
-	Any failure or malfunction of any pollution control equipment or any incident, which has caused, is causing or may cause pollution	Part B: As soon as practicable	

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

Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map and emission points

The Premises and location of emission points defined in table 2.3.1 are shown in the map below. The pink line depicts the Premises boundary.





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: L5982/1994/11	Licence File Number: 2011/011415
Company Name: Jetstar Enterprises Pty Ltd Trading as: Permapole	ACN: 098 804 436
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: L5982/1994/11
Form: WR1
Name: Monitoring of point source emissions to surface water

Licensee: Jetstar Enterprises Pty Ltd
Period :

Form WR1: Monitoring of point source emissions to surface water							
Emission point	Parameter	Limit	Surface result	At depth result	Averaging period	Method	Sample date & times
W1	Date of discharge						
W1	Volume of water discharged	-	L	L	Spot sample		
W1	pH	6.5-8.5			Spot sample		
W1	Copper (total)	<0.2 mg/L	mg/L	mg/L	Spot sample		
W1	arsenic (dissolved)	<0.013 mg/L	mg/L	mg/L	Spot sample		
W1	Chromium (total)	<0.01 mg/L	mg/L	mg/L	Spot sample		
W1	hexavalent chromium (dissolved)	-	mg/L	mg/L	Spot sample		
W1	Total dissolved solids	-	mg/L	mg/L	Spot sample		
W1	Total suspended solids	-	mg/L	mg/L	Spot sample		

Signed on behalf of Jetstar Enterprises Pty Ltd:

Date:



Licence: L5982/1994/11
Form: N1

Licensee: Jetstar Enterprises Pty Ltd
Date of breach:

Notification of detection of the breach of a limit or any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution.

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	
Name of operator	
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	

Notification requirements for any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution

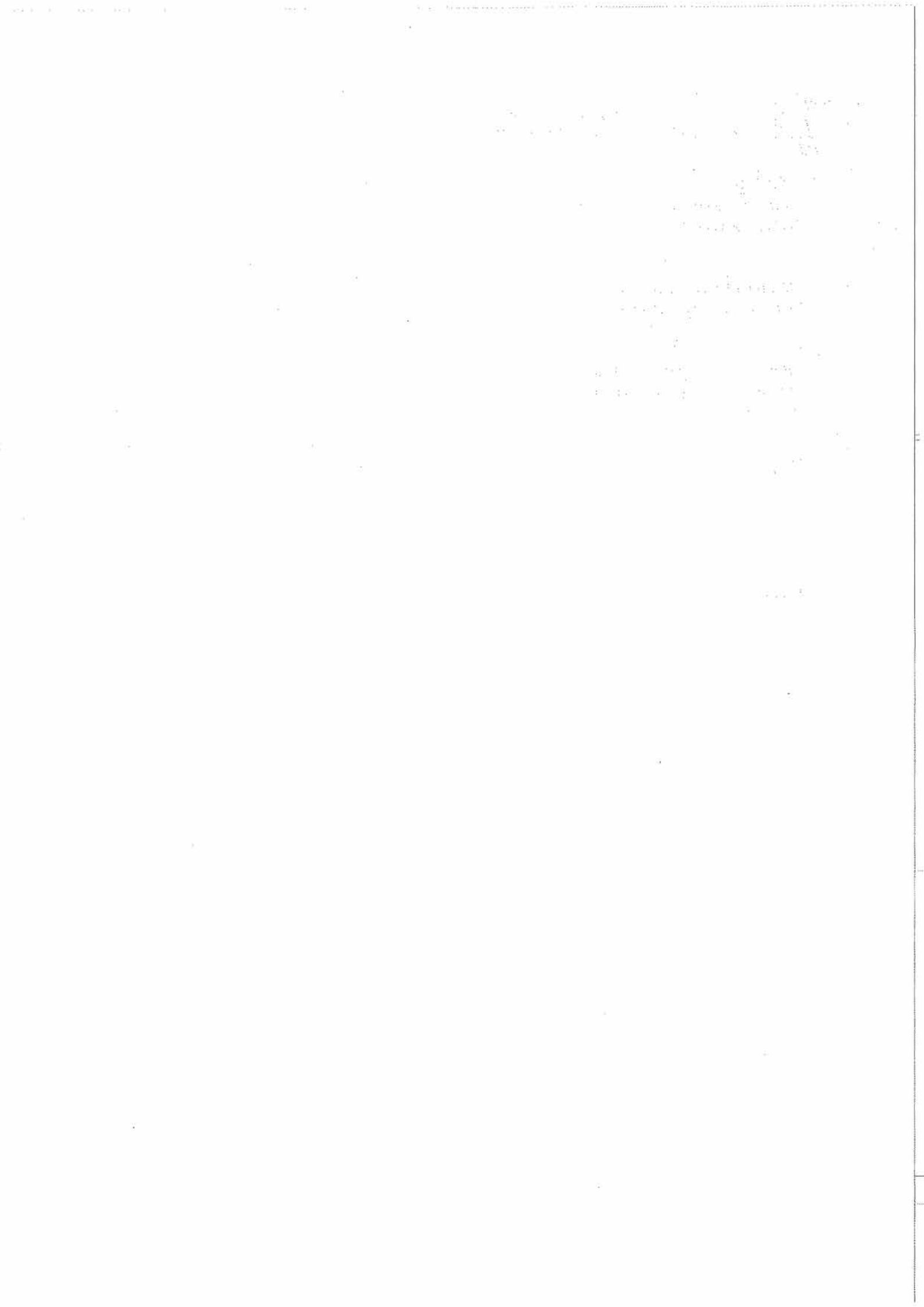
Date and time of event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident	



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 Jetstar Enterprises Pty Ltd	
Date	





Decision Document

Environmental Protection Act 1986, Part V

Licensee: Jetstar Enterprises Pty Ltd

Licence: L5982/1994/11

Registered office: Level 2, 35-37 Havelock Street
WEST PERTH WA 6005

ACN: 098 804 436

Premises address: Permapole
394 Robertson Road
CARDUP WA 6122
Being Part of Lot 60 on Diagram 59263 as depicted in Schedule 1.

Issue date: Thursday, 25 September 2014

Commencement date: Monday, 29 September 2014

Expiry date: Saturday, 28 September 2019

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by:

Jessica French
Licensing Officer

Decision Document authorised by:

Marko Pasalich
Manager Licensing



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	13
6 Risk Assessment	14
Appendix A	15

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.

Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.4, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.4, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions is justified in Section 4 of this document.

Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence (re-issue) <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)	Assessed design capacity
	29	15 000 tonnes per year
Application verified	Date: 15/7/2014	
Application fee paid	Date: 17/7/2014	
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 type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.		



3 Executive summary of proposal and assessment

Jetstar Enterprises Pty Ltd is the licensee for the Permapole timber preservation plant located at 394 Robertson Rd Cardup, within the Urban Development Zone of the Shire of Serpentine-Jarrahdale. South of the prescribed premises (but within the same lot) is a Bushforever site. The north-western portion of the premises is a multiple use geomorphic wetland and approximately 70 meters to the north (downstream) is a conservation category wetland due to the presence of a Threatened Ecological Community of *Corymbia calophylla*, which forms part of the railway reserve. The closest residential receptor is a house on a rural property is located 130m to the west of the premises. According to EPA Guidance Statement No. 3, the recommended separation distance between a timber preservation plant and a sensitive receptor is 300-500 metres, with the main impacts of concern being noise, dust and odour.

The plant was established in 1978 by Bunnings. Jetstar Enterprises Pty Ltd purchased the business in 2003 and has been the licence holder since then.

Permapole receives raw pine logs from pine plantations. The raw pine logs are stored on a "log wetting" area where they are kept damp via irrigation to ensure that the timber does not splinter during debarking. The run-off from the log wetting is discharged from the premises into the Shire's stormwater system via an open drainage line connected to a sediment basin. The run-off has been a source of contention for the premises as it is discoloured and has the potential to be odorous. The irrigation system is connected to a timer system which is set so that minimal run-off is produced. Furthermore a procedure for preventing water run-off will be developed by the end of November 2014 and a drainage intercept and water return for water re-use and preventing run-off will be constructed by the end of January 2015.

The logs are then debarked by debarking machinery. The saw dust and pine bark is sold off for various uses such as garden products and animal bedding.

The debarked logs are sent to a pressure cylinder for copper chrome arsenate (CCA) treatment. The CCA concentrate is stored in a 29 000 litre double skinned tank within a 32 000 litre concrete bund which is licenced by the Department of Mines and Petroleum. The concentrate is diluted with recycled water from the sites dam and bore water as required and stored in a separate tank. The diluted solution is pumped into the pressure cylinder containing the logs and CCA enters the cells of the wood. The process takes about 10 minutes. Once the treatment is complete, excess solution is pumped out of the cylinder and into a tank. Following treatment, the CCA-impregnated logs are transferred to a covered curing area for CCA fixation. During curing, CCA-solution drips from the logs onto the curing area's concrete apron and bund, which reports back to the blind sump of the storage tanks and treatment cylinders. The curing time is variable with a minimum fixation time of 7 days during ideal conditions or longer in winter.

The cured timber is stored in the yard. During rainfall events, there is a potential for run-off to become contaminated with CCA, therefore the storage yard contains drainage lines to ensure that any potentially contaminated run-off enters the sites lined secondary containment pond. The pond is lined with a synthetic material and it has a 2,000,000 litre holding capacity. The level of the pond water is checked daily and when it appears to be reaching the high water mark (which marks the 1 in 10 year ARI event), its contents are treated with lime and ferrous sulphate hepta which adjusts the pH and drops the metals out of the water column. The water quality is then tested by a NATA accredited laboratory and if it meets the discharge criteria set in the DER licence, its full contents are discharged offsite into the councils open drainage line.

This Licence is the successor to licence L5982/1994/10 and includes changes to the conditions, so that the licence conforms to DER's new licensing format and it includes additional conditions in relation to the implementation of the sites Environmental Action Plan dated 4 August 2014.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, DEC's Policy Statement - Limits and targets for prescribed premises (2006), 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	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.3, L1.2.5, L1.2.6, L4.1.2-IR4	OSC	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> The licensee undertook an environmental risk assessment of the premises and identified minor issues with the storage of chemicals – namely hydrocarbons and Copper Chrome Arsenate (CCA). <i>Impact:</i> Potential contamination of surrounding soil, groundwater and surface water in the case of an emergency situation such as a failure of a containment system. <i>Controls:</i> CCA concentrate is stored in a double-skinned tank that is licenced by the Department of Mines and Petroleum. All chemicals and hydrocarbons are stored within a concrete bunded hardstand that is designed to capture any spills. The freshly treated timber is stored on a concrete drip pad until it has cured. The drippings and any spills or rainfall that enters the hardstand and bunded areas is re-used in the timber treatment process. The Licensee will implement procedures for the inspection and maintenance of all containment systems as per the sites Environmental Action Plan.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> OSC 1.2.3 has been added to the licence to require the operator to undertake</p>	<p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Risk Assessment Report, Sustainability Pty Ltd, July 2014</p> <p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, Sustainability Pty Ltd, 4 August 2014</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations, 2004</i></p>



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
			<p>improvements to chemical storage areas that were identified in the sites Environmental Risk Assessment Report and Environmental Action Plan. OSC 1.2.5 has been included to ensure that potentially contaminated stormwater is diverted away from uncontaminated stormwater.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p>OSC 1.2.6 and improvement condition IR4 has been added to the licence to install boundary markers because the premises boundary has changed since the issue of the previous licence. The abnormal shape of the premises boundary makes it difficult to identify the southern boundary from the ground. A fence marks the north, west and eastern boundaries.</p>	
Premises operation	1.3.1-1.3.3	OSC	Site specific management of the operations is discussed in the point source emissions to surface water section of this document. Specific requirements in relation to the liner requirements of the secondary containment pond and the management of the volume of its contents are included in conditions 1.3.1 and 1.3.2. Condition 1.3.3 has been carried over from condition 5 of the previous licence L5982/1994/10, and contains a specific requirement for wastewater from the log wetting area to be retained on-site as this is not an authorised discharge for the premises.	<i>Environmental Protection Act 1986</i> Licence L5982/1994/10
Emissions general	L2.1.1	OSC	Limits will be set through section 2 of the licence. OSC regarding recording and investigation of exceedances of limits or targets has been included.	
Point source emissions to air including monitoring	N/A	N/A	There are no point source emissions to air from this premises that require regulation through this section. Standard conditions 1.2.1 and 1.2.2 applies to the extraction systems in the bark stripping and shaving area.	N/A



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to surface water including monitoring	L2.3.1, L2.3.2, L3.3.1	NSC	Operation DER's assessment and decision making are detailed in Appendix A.	Appendix A
Point source emissions to groundwater including monitoring	N/A	N/A	There are no point source emissions to groundwater from this premises therefore no specified conditions are required in this section of the licence.	N/A
Emissions to land including monitoring	N/A	N/A	There are no point source emissions to land from this premises therefore no specified conditions are required in this section of the licence.	N/A



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Fugitive emissions	L2.6.1	OSC	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Dust from bark stripping and log shaping. <i>Impact:</i> Potential nuisance for neighbouring premises. <i>Controls:</i> The dust sensitive premises is a house located within the Special Rural Zone of Cardup, approximately 130m to the west of the premises. Bark stripping and log shaping is undertaken in an enclosed shed. Pine shavings and bark are stored in three-sided bins. A dust extraction system is fitted to the shed. Fines are collected in a hopper. The hopper is emptied weekly.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The optional standard dust condition L2.6.1 has been included in the licence to ensure that the licensee undertakes all reasonable and practicable measures to prevent dust emissions from the premises.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	Permapole (Jetstar Enterprises Pty Ltd) Environmental Risk Assessment Report, Sustainability Pty Ltd, July 2014



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Odour	L2.7.1	OSC	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Odour generated from the tannin stained water at the log wetting. <i>Impact:</i> Potential nuisance for neighbouring premises. <i>Controls:</i> The irrigation system used to keep logs damp has a timing system that is set to ensure that excessive runoff is not produced. The licensee will develop and implement a procedure for preventing run-off by the end of November 2014. The drainage system will be redesigned and the run-off will be re-used on the premises by January 2015. Controlling the amount of wastewater produced will minimise odour production.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Possible <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The licensee has committed to undertaking upgrades to the premises, therefore the actions in the sites Environmental Action Plan have been included in the Improvements section of this licence. The optional standard odour condition has also been included in this licence to ensure that the premises does not emit unreasonable odour.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	<p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, Sustainability Pty Ltd, 4 August 2014</p> <p><i>Environmental Protection Act 1986</i></p>



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Noise	N/A	N/A	The <i>Environmental Protection (Noise) Regulations 1997</i> are sufficient in regulating noise emissions from this premises therefore no specified conditions were included in this section of the licence.	<i>Environmental Protection (Noise) Regulations 1997</i>
Monitoring general	L3.1.1, L3.1.2	OSC	Descriptive limits will be set through condition 2.6.2 of the licence and therefore OSC regarding recording and investigation of exceedances of limits or targets has been included.	Regulatory monitoring requirements for prescribed premises, Department of Environment, 2006 Australian Standard AS/NZS 5667.1 – Water Quality – Sampling – Guidance on the Design of sampling programs, sampling techniques and the preservation and handling of samples Australian Standard AS/NZS 5667.4 – Water Quality – Sampling part 4 – Guidance on sampling from lakes, natural and man-made
Monitoring of inputs and outputs	L3.3.1	NSC	Treated water from the containment pond is discharged into the environment. Monitoring of the quantity of water discharged off-site is required in condition 3.3.1 in the licence.	N/A
Process monitoring	N/A	N/A	There are no processes undertaken at the premises that require monitoring therefore no specified conditions are included in this section of the licence.	N/A



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Ambient quality monitoring	N/A	N/A	<p>The discharges to surface water require monitoring and the water quality must meet the discharge criteria, specified as limits in the licence, prior to being discharged from the premises. The discharge criteria ensures sufficient protection of the environmental and health values of the receiving environment therefore ambient surface water quality monitoring conditions are not required in this licence.</p> <p>There was a concern from the public that the organic build up from the log wetting area could affect groundwater. The site is located on ironstone, which is described as limonite gravel cemented in a quartz sand/ limonite/ silt matrix. The permeability of the ironstone is classified as variable with low shrink-swell potential and high bearing load capacity.</p> <p>The proponent will be undertaking an investigation of the groundwater in the area surrounding the lined pond as per the sites Environmental Action Plan. The reason behind this is because the integrity of the pond is unknown and it is unknown if seepage has occurred. Should groundwater contamination be identified as an issue of concern for this premises, the licence will require another review and groundwater monitoring would be required.</p>	<p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Risk Assessment Report, Sustainability Pty Ltd, July 2014</p> <p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, Sustainability Pty Ltd, 4 August 2014</p>
Meteorological monitoring	N/A	N/A	<p>This premises does not contain a meteorological monitoring station. Daily checks are undertaken of the pond and of on-line weather forecasts to ensure that the pond contains enough capacity to contain rainfall. Licence conditions relating to meteorological monitoring are not required in this licence.</p>	N/A



DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Improvements	L4.1.1, L4.1.2	NSC	<p>The licensee employed an Environmental Consultant to undertake an Environmental Risk Assessment for the premises. This report was reviewed and accepted by DER. A timeline was prepared in an Environmental Action Plan with appropriate timeframes to develop procedures and undertake improvements to various aspects of the premises such as chemical and hydrocarbon storage, site drainage and runoff management and general site matters. A condition has been included in the licence to ensure the licensee undertakes the actions specified in the Plan.</p> <p>The premises is located on a part Lot was an unusual shape so IR2 is included in the licence for the licensee to install permanent markers along the boundary of the premises so it can be identified on the ground. The existing fence on the north, west and eastern boundaries will be used as a marker, and alternative markers such as pegs will be used on the southern boundary.</p>	<p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Risk Assessment Report, Sustainability Pty Ltd, July 2014</p> <p>Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, Sustainability Pty Ltd, 4 August 2014</p>
Information	L5.3.1	OSC	The licence includes emission limits, therefore OSC 5.3.1 has been included in the licence, requiring the licensee to notify the CEO as soon as practicable in the case of a breach of a limit specified in the licence.	N/A
Licence Duration	N/A	N/A	<p>The premises currently has an overall priority rating of medium due to the recent public interest in the premises operations.</p> <p>There are no factors that restrict the duration of this licence. The licence will be issued for the standard 5 year period.</p>	N/A



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
04/08/2014	Application advertised in West Australian	Nil	N/A
30/07/2014	Application referred to interested parties listed: The Jarrahdale-Serpentine Ratepayers and Residents Association	Via telephone – potential build-up of odour and organics from the log wetting area from the re-use of run-off.	The Environmental Action Plan addresses improvements to the log wetting area and has been included as an improvement condition on the licence. Included the optional standard odour condition.
09/09/2014	Proponent sent a copy of draft instrument	17/9/2014 via email: 1.2.6 and 4.1.2 – boundary markers should only be required for southern portion of premises. 1.3.1 – The permeability of the pond is unknown so the permeability standard should be removed. 1.3.3 – prevention of run-off should come into effect after the agreed timeframe in the action plan. 2.3.2 and 3.3.1 – The limits for TDS and TSS are not justified, question about the suitability of the arsenic and copper discharge limit. 5.2.1 – Clarification of what is meant by “annual period”. DD – Southern portion of site is not Bushforever due to the change in premises boundary. Redescribe the curing/fixation process.	1.2.6 and 4.1.2 – clarified the requirement in the decision document. 1.3.1 – removed permeability standard as the action plan will ensure the pond is sufficiently constructed. 1.3.3 – reworded condition so that it comes into effect after 31/1/15. 2.3.2 and 3.3.1 – limits for TDS and TSS removed, however monitoring of those parameters will remain and will be compared to relevant guidelines by DER annually. 5.2.1 – clarified with proponent and reported to the Delegated Officer. DD – redescribed the location of the Bushforever site and the curing process.



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



Appendix A

Point source emissions to surface water including monitoring

Operations

Emission: During emergency situations, such as extreme rainfall (greater than 1 in 10 year ARI), stormwater and runoff potentially contaminated with copper, chrome, arsenic and sediment collected from the treated timber storage area, overtopping from the pond and entering the local drainage system.

Impact: Contamination of surrounding surface water drainage systems. The local drainage system includes a conservation category wetland and a multiple use geomorphic wetland. The water may be used for rural purposes which could include irrigation and livestock water. Potential impacts on ecology of surface water from the addition of sediment and heavy metals.

Controls: The licensee currently directs potentially contaminated stormwater to a synthetic lined pond of unknown condition. The condition of the pond requires integrity testing. The freeboard is inspected daily and maintained by staff to prevent overflow during extreme weather events (1 in 10 year storm). The contents of the pond are treated with lime and ferrous sulphate hepta which adjusts the pH and drops the metals out of the water column. The water quality is then tested by a NATA accredited laboratory and if it meets the discharge criteria set in the DER licence, it is discharged offsite into the councils open drainage line. The discharge occurs in wet periods when the pond is nearing capacity. The discharge occurs approximately 7 times a year which equates to approximately 14 megalitres of water.

The licensee reuses pond water in the timber treatment process, and has proposed to increase the pumping capacity to increase the re-use of water on-site.

Risk Assessment

Consequence: Minor

Likelihood: Unlikely

Risk Rating: Moderate

Regulatory Controls

OSC L2.3.1, L2.3.2 and L3.3.1 have been included in this licence requiring the licensee to undertake monitoring of the water quality to ensure it meets the discharge criteria, prior to being discharged from the premises. The previous licence contained a discharge criteria, however the discharge criteria has been re-assessed to ensure that the discharge does not cause a negative impact to the environment. DER has identified that the environmental values of the surrounding area that could potentially be impacted from the discharge relate to a conservation category wetland containing a threatened ecological community of *Corymbia calophylla* located 70 metres downstream, livestock health, human health and amenity, and by the time the discharge reaches the Cardup Brook (which is located approximately 1.8 km to the north), the ecology of freshwater systems.

The parameters of concern were identified as pH, copper, arsenic and chromium. Potential parameters of concern are total dissolved solids (TDS) and total suspended solids (TSS) as the runoff generated on the site has the potential to gather material from the unsealed storage areas. TDS is a measure of combined organic and inorganic substances. TSS is a measure of turbidity. Both parameters were previously not required to be monitored and have been included in condition 3.3.1 so it can be determined if these are issues for the premises.

Each parameter was compared against relevant guideline figures when determining the most appropriate discharge limit. The discharge criteria is based upon the Australian and New Zealand guidelines for fresh water quality (95% species protection) for arsenic and pH. Copper is based upon the ANZECC long term irrigation guidelines. The discharge criteria from the previous licence for total chromium was sufficient as it fell below relevant guideline criteria. Hexavalent chromium is a known



carcinogen and its levels are monitored, however no limit is imposed because the chemical treatment undertaken to meet the discharge criteria, also converts hexavalent chrome into the less toxic trivalent chrome. Previous monitoring results show that hexavalent chrome is not detected in the water column.

Parameter	Old limit	New limit
pH	6-9	6.5-8.5
Copper	0.5 mg/L	0.2 mg/L
Arsenic	0.05 mg/L	0.013 mg/L
Chromium	0.01 mg/L	0.01 mg/L

Residual Risk

Consequence: Insignificant

Likelihood: Unlikely

Residual Risk Rating: Low

The more stringent discharge criteria ensures better protection of the environmental values of the receiving environment.

Reference Documents

Australian and New Zealand guidelines for fresh and marine water quality, ANZECC, 2000.

Assessment levels for Soil, Sediment and Water, Department of Environment and Conservation, February 2010.

Emission: Discoloured and potentially odorous water from the log wetting area to the local drainage system.

Impact: Contamination of surrounding surface water drainage systems. Potential impacts on ecology of surface water from the addition of sediment and total organic carbon. Potential impacts to the local amenity such as nuisance odour and discoloured waterways.

Controls: The irrigation system of the log wetting is fitted with a timer that minimises the generation of runoff. The licensee will develop and implement a procedure for preventing run-off and pooling by the end of November 2014. The drainage system will be redesigned and the run-off will be re-used on the premises by January 2015, preventing further off-site discharges.

Risk Assessment

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

The discharge from the log wetting area was not an authorised discharge in the previous licence and will not be authorised in the new licence. Improvement conditions 4.1.1 and 4.1.2 have been included in the licence requiring the licensee to undertake the actions of the sites Environmental Action Plan, which has been accepted by DER. The improvements to the premises will ensure that all runoff from the log wetting is captured and re-used on-site, ceasing the off-site discharge.

Residual Risk

Consequence: Minor

Likelihood: Rare

Residual Risk Rating: Low



Reference Documents

Permapole (Jetstar Enterprises Pty Ltd) Environmental Risk Assessment Report, Sustainability Pty Ltd, July 2014

Permapole (Jetstar Enterprises Pty Ltd) Environmental Action Plan, Sustainability Pty Ltd, 4 August 2014