



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

Your ref: L8295/2008/3
Our ref: DEC9875
Enquiries: Richard Wilson
Phone: 9333 7545
Fax: 9333 7550
Email: richard.wilson@der.wa.gov.au

The Manager
Chemicals Australia Operations Pty Ltd
Level 10, 1 Nicholson Street
EAST MELBOURNE Vic 3002

Dear Mr L'Huillier

ENVIRONMENTAL PROTECTION ACT 1986 - TRANSFER OF LICENCE L8295/2008/3

Premises:

Sodium Hypochlorite Plant Project Zephyr
Part Lot 2 on Diagram 72910, 52 Sheffield Road, WELSHPOOL WA 6106

Licence Number: L8295/2008/3

Thank you for your application to transfer your licence from Orica Australia Pty Ltd to Chemicals Australia Operations Pty Ltd.

Please find enclosed your transferred *Environmental Protection Act 1986* licence and conditions.

If you have any questions or objections relating to the licence conditions, please do not hesitate to contact Richard Wilson on 9333 7545 for clarification or discussion.

Yours sincerely

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

26 March 2015

enc: Licence
copy to: Local Government Authority: City of Canning



Licence

Environmental Protection Act 1986, Part V

Licensee: Chemicals Australia Operations Pty Ltd

Licence: L8295/2008/3

Registered office: Level 3
1 Nicholson Street
EAST MELBOURNE VIC 3002

ACN: 600 546 512

Premises address: Zephyr Hypochlorite Plant
52 Sheffield Road
WELSHPOOL WA 6105
Being part of Lot 2 on Diagram 72910 as depicted in Schedule 1.

Issue date: Monday, 22 December 2014

Commencement date: Wednesday, 24 December 2014

Expiry date: Monday, 23 December 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
31	Chemical manufacturing: Premises (other than premises within category 32) on which chemical products are manufactured by a chemical process.	100 tonnes or more per year	50,000 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*



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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 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

Orica Australia Pty Ltd (Orica) commissioned the Orica Zephyr Hypochlorite Plant in 2008 to produce Sodium Hypochlorite for the Western Australian market. The Premises is located within an industrial area in Welshpool with other industrial premises surrounding the Premises. It is located approximately 11km to the South-East of Perth CBD. The nearest residents are located just over 1km to the South-East.

Sodium Hypochlorite (Hypo) is manufactured in the Powell plant through the reaction of Chlorine liquid and dilute caustic soda within a dedicated reactor. An eight head chlorine manifold can be utilised in full or part to determine the quantity of Hypo required to be made, including the reaction rate. The system is designed with a number of safety controls to minimise the potential for a release of chlorine to the environment.

This includes:

- manufacturing the hypo with caustic in excess and
- the use of an extraction system in the manufacturing building and storage yard to draw away any potential accidentally released chlorine gas which is then directed to the caustic soda scrubber to absorb any released chlorine gas.

Hypo is manufactured all year round with a peak season through the warmer months of October to May.

This Licence is the successor to licence L8295/2008/2, which was converted to REFIRE format in December 2014 and transferred to Chemicals Australia Operations in March 2015.

The licences and works approvals issued for the Premises are:

Instrument log		
Instrument	Issued	Description
W4420/2008/1	19/06/2008	Works Approval to construct the Premises
L8295/2008/1	24/12/2008	First licence issued for the Premises
L8295/2008/2	15/12/2011	Licence re-issue
L8295/2008/3	12/12/2014	Licence re-issue and conversion to REFIRE format
L8295/2008/3	26/03/2015	Licence transferred to Chemicals Australia Operations Pty Ltd

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'AHD' means the Australian height datum;

'annual period' means the inclusive period from 1 January until and including 31 December of each year;

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

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

'CEO' for the purpose of correspondence means;

Manager Licensing (Process Industries)
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850
Telephone: (08) 9333 7510
Facsimile: (08) 9333 7550
Email: industry.regulation@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;

'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 2.2, 2.3, 2.4 and 2.5;

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

'Licence' means this Licence numbered L8295/2008/3 and issued under the Act;

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



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

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

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

'usual working day' means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.

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

1.3 Premises operation

There are no specified conditions relating to Premises operation in this section.



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

- 2.2.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 [and identified on the map of emission points in Schedule 1] it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emission points to air			
Emission point reference and location on Map of emission points	Emission Point	Emission Point Height	Source, including any abatement
A1	Powell Sentry Scrubber stack	12.5m	Chlorine process vapours and emergency vent vapours via a scrubber.

- 2.2.2 The Licensee shall target point source emissions to air at or below the levels specified in Table 2.2.2.

Table 2.2.2: Point source emission target to air				
Emission point Reference	Parameter	Target (including units) ¹	Frequency	Averaging period
A1	Chlorine	3ppm	Continuous	N/A

Note 1: measured at stack conditions

- 2.2.3 The Licensee shall take the specified management action in the case of an event in Table 2.2.3

Table 2.2.3: Management actions			
Emission point reference	Event/ action reference	Event	Management action
A1	EA1	The continuous chlorine sensor on emission point A1 registers chlorine levels above the target as specified in condition 2.2.2.	The Licensee shall immediately isolate the chlorine gas feed to the reactor vessel. Investigate the exceedance and resolve the issue as soon as it is safe to do so.

- 2.2.4 Following the cessation of emissions/operation under Condition 2.2.2 or 2.2.3, the Licensee shall not restart operation of the process until:
- the problem that caused the exemption event has been rectified; or
 - the Licensee records the actions taken to maintain compliance with the Licence until the problem causing the exemption event has been rectified.

2.3 Point source emissions to surface water

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



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

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

2.7 Odour

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

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 all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.

3.1.2 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 point source emissions to air

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 point source emissions to air

Emission point reference	Parameter	Units ¹	Frequency	Method
A1	Chlorine	ppm	Continuous	Electrochemical Sensor (Dräger Polytron 7000)

Note 1: measured at stack conditions

3.2.2 The Licensee shall immediately isolate the chlorine gas feed to the reactor vessel upon any failure of the monitoring equipment as required by condition 3.2.1.

3.3 Monitoring of point source emissions to surface water

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

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

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

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
Table 2.2.2 – 2.2.3	Target exceedances, results of any investigation into the cause of the target exceedance and what management action was taken.	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

5.3 Notification

There are no specific notification requirements in this section.



Schedule 1: Maps

Premises map and Map of emission Point





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A

LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name:	ABN:
Trading as:	
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialised 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: _____

SIGNATURE: _____

NAME:
(printed) _____

NAME:
(printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Chemicals Australia Operations Pty Ltd

Licence: L8295/2008/3

Registered office: Level 3
1 Nicholson Street
EAST MELBOURNE VIC 3002

ACN: 600 546 512

Premises address: Zephyr Hypochlorite Plant
52 Sheffield Road
WELSHPOOL WA 6105
Being part of Lot 2 on Diagram 72910

Issue date: Monday, 22 December 2014

Commencement date: Wednesday, 24 December 2014

Expiry date: Monday, 23 December 2019

Decision

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

Decision Document prepared by: Richard Wilson
Licensing Officer

Decision Document authorised by: Jonathan Bailes
Manager Licensing



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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.

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 <input type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/> Licence Transfer <input checked="" type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	31 Chemical Manufacturing	50,000 tonnes per annual period
Application verified	Date: NA	
Application fee paid	Date: NA	
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"/> 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

Orica Australia Pty Ltd (Orica) commissioned the Orica Zephyr Hypochlorite Plant in 2008 to produce Sodium Hypochlorite for the Western Australian market. The Premises is located within an industrial area in Welshpool with other industrial premises surrounding the Premises. It is located approximately 11km to the South-East of Perth CBD.

The nearest residents are located just over 1km to the South-East. Sodium Hypochlorite (Hypo) is manufactured in the Powell Sodium Hypochlorite Batch System plant through the reaction of chlorine liquid and dilute caustic soda (sodium hydroxide) within a dedicated reactor. An eight head chlorine manifold can be utilised in full or part to determine the quantity of Hypo required to be made, including the reaction rate. The system is designed with a number of safety controls to minimise the potential for a release of chlorine to the environment. This includes:

- manufacturing the hypo with caustic in excess; and
- the use of an air extraction system in the manufacturing area to draw away any potential chlorine gas which is then directed to a caustic soda scrubber and treated to absorb chlorine gas from the air stream.

Hypo is manufactured all year round with a peak season through the warmer months of October to May.

The premises holds a dangerous goods licence and is a Major Hazards Facility.

This partial decision document is for the transfer of the licence from Orica Australia Pty Ltd to Chemicals Australia Operations Pty Ltd.

N/A	The licence has been transferred to Chemicals Australia Operations Pty Ltd from Orica Australia Pty Ltd. Documents confirming that the occupier has changed have been submitted to DER.	ASIC Current & Historical Company Extract dated 22/02/2015. ASX Announcement regarding the sale of Orica's Chemicals business dated 02/03/2015.
NSC	The Licence was previously issued with an improvement condition requiring the Licensee to submit an assessment of the risk to the environment from emissions to air to DER by 15 February 2015. The assessment was submitted to DER on 12 February 2015. Therefore the improvement program has been completed. No changes to the Licence are required as a result of the assessment. Conditions 4.1.1, 4.1.2 and Table 4.1.1 have been removed from the Licence.	Emission Point A1: Assessment of Suitability of Monitoring Equipment (Document Number WEL-01-001) dated 11/02/2015



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
N/A	No consultation required – licence transfer	N/A	N/A



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High