



Licence

Environmental Protection Act 1986, Part V

Licensee: Timber Treaters Bridgetown (WA) Pty Ltd

Licence: L6437/1990/11

Registered office: 123 Albany Hwy
KOJONUP WA 6395

ACN: 123 878 697

Premises address: Timber Treaters Bridgetown
444 Hester Road
HESTER WA 6255
Being Lots 10, 11, 12, 13, 14, 15 and 26 on Plan 222567 and Lots 72 and 73 on Plan 216748 as depicted in Schedule 1.

Issue date: Thursday, 25 September 2014

Commencement date: Wednesday, 1 October 2014

Expiry date: Friday, 30 September 2016

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	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

Timber Treaters Bridgetown (Timber Treaters) is a timber preserving business located in Hester, near Bridgetown, in an area zoned 'Industrial'. Surrounding landuse is primarily residential, with housing separated from Timber Treaters by Hester Road on one side and a railway reserve on the other. Blackwood Timber Milling adjoins the eastern side of the property.

Raw pine logs are received and de-barked. They are then stored for up to nine months to reduce moisture content (or dried using a pressure vessel). The dried wood is treated with diluted copper chrome arsenate (CCA) solution in a pressure vessel. The vessel is then opened and the treated timber removed. It is stored on a concrete hardstand for a minimum of 24 hours to dry, with drips draining to a concrete sump. The contents of the concrete sump are used as makeup water for the treatment process.

Most of the premises slopes downwards to a dam, collecting uncontaminated stormwater. The dam has an overflow point, discharging into surface water on the neighbouring property. Emission limits are included in the licence in relation this discharge and monitoring is required for the dam and this discharge.

The main emissions from the premises are discharges to surface water from the dam as well as the generation of solid waste which is disposed of off-site. A full licence review of this premises is required, but is not possible at present. Therefore most of the conditions in this licence have been replicated from the previous licence with some changes to standard or optional standard conditions and the inclusion of improvement conditions to ensure that the premises complies with AS:2843 for Timber preservation plants and the Australian Environmental Guidelines for Copper Chrome Arsenate Timber Preservation Plants, ANZECC, 1996.

This Licence is the successor to licence L6437/1990/10 and includes changes to conditions to update the licence to refile format, and to include improvement conditions.

The licences and works approvals issued for the Premises since 22 September 2011 are:

Instrument log		
Instrument	Issued	Description
L6437/1990/10	22/09/2011	Licence reissue
L6437/1990/10	11/10/2011	Licence amendment to correct minor error from reissue
L6437/1990/11	25/09/2014	Licence reissued in REFIRE format (not reviewed)



Severance

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

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

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

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

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

'annual period' means the inclusive period from 1 January until 31 December 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*;

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

'CCA' means copper chrome arsenate;

'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
PO Box 1693
BUNBURY WA 6231
Telephone: (08) 9725 4300
Facsimile: (08) 9725 4351
Email: grswanbunbury@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 section 2.3;

'Licence' means this Licence numbered L6437/1990/11 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;

'Process wastewater' means water from the treatment process, water draining from drip pads and stormwater falling within bunded areas;

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

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

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

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

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the 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.

1.3 Premises operation

- 1.3.1 The Licensee shall not dispose of CCA treated timber by burning.
- 1.3.2 The Licensee shall only dispose of non-CCA timber and/or wood waste by burning if:
- (a) it is dry and seasoned for two months before burning;
 - (b) it is burnt in a dedicated area at least 100 metres from any CCA treated timber;
 - (c) an adequate water supply and distribution system is provided to prevent fires from escaping beyond the burning area;
 - (d) it is burnt in a manner to minimise the generation of smoke;
 - (e) it is burnt when weather conditions favour the dispersion of smoke generated and/or to blow smoke away from adjacent residences;
 - (f) it is burnt in windrows or trenches;
 - (g) the volume of timber and wood waste burnt is restricted such that it is completely burnt during daylight hours;
 - (h) the fire is attended by the Licensee until it is extinguished; and
 - (i) the CEO is advised at least 24 hours prior to the burning commencing.
- 1.3.3 The Licensee shall at all times handle CCA solution in such a manner as to prevent its discharge to the environment.
- 1.3.4 Contaminated absorbent materials shall be stored in an airtight container and disposed of off-site as a controlled waste.
- 1.3.5 The Licensee shall process wastewater for chemical make-up.
- 1.3.6 The Licensee shall store on site any process wastewater, not reused in the process, in an impervious tank, prior to disposal off-site.
- 1.3.7 The Licensee shall keep a record of all controlled waste stockpiled on site including:
- (a) the nature, source and volume of the waste;
 - (b) when the material was produced;
 - (c) the method of treatment of containment; and
 - (d) the storage location.

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 2.2.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this Licence.

Table 2.3.1: Emission points to surface water

Emission point reference	Emission point reference on Map of emission points	Description	Source including abatement
W1	Dam outlet	Overflow point from dam to surface water	Stormwater runoff from the premises

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	Copper	≤1 mg/L	Spot sample
W1	Chromium (III)	≤0.5 mg/L	Spot sample
W1	Chromium (VI)	≤0.05 mg/L	Spot sample
W1	Arsenic	≤0.05 mg/L	Spot sample
W1	pH	6-9	Spot sample

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.

2.6.2 The Licensee shall ensure that no visible dust generated by the activities on the Premises crosses the boundary of the Premises.

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:
- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
 - (b) all wastewater sampling is conducted in accordance with AS/NZS 5667.10;
 - (c) all surface water sampling is conducted in accordance with AS/NZS 5667.4, AS/NZS 5667.6 or AS/NZS 5667.9 as relevant; and
 - (d) 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 quarterly monitoring is undertaken at least 45 days apart;

3.1.3 The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specification.

3.1.4 The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.

3.2 Monitoring of 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.

Emission point reference	Parameter	Units	Frequency
W1, Dam North, Dam South	pH	-	Quarterly and when discharging
	Copper, Chromium (III), Chromium (VI), Arsenic	mg/L	Quarterly and when discharging

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

Table 4.1.1: Improvement program		
Improvement reference	Improvement	Date of completion
IR1	The Licensee shall submit to the DER an audit of the operations of the premises against the Australian Environmental Guidelines For Copper Chrome Arsenate Timber Preservation Plants, Australian and New Zealand Environment and Conservation Council, The Timber Preservers Association of Australia, September 1996 and the AS/NZS 2843.2:2006 Australian and New Zealand Standard, Timber Preservation Plants.	1/06/15

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.

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 3.3.1	pH, copper, chromium (III), chromium (VI), arsenic	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified
-	Throughput of timber for the annual period	None specified

Note 1: Forms are in Schedule 2

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.

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	
3.1.5	Calibration report	As soon as practicable.	None specified

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

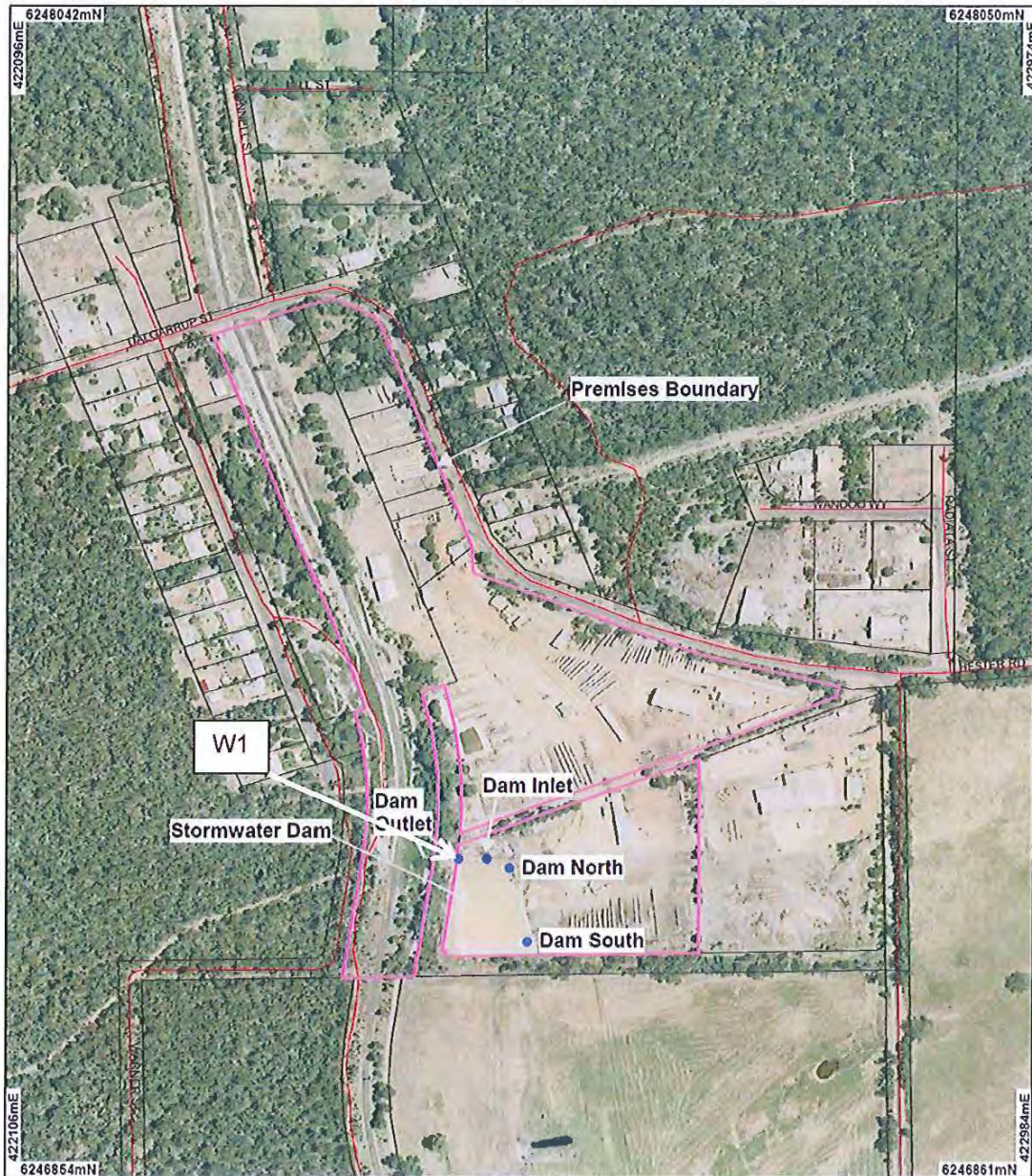


Schedule 1: Maps

Premises map

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

The location of emission points shown in Table 2.3.1 is shown in the map below.





Schedule 2: Reporting & notification forms

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

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A

LICENCE DETAILS

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

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

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

Yes Please proceed to Section C

No Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME:
(printed) _____

NAME:
(printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Licence: L6437/1990/11
Form: N1

Licensee: Timber Treaters Bridgetown
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 Timber Treathers Bridgetown	
Date	





Decision Document

Environmental Protection Act 1986, Part V

Proponent: Timber Treaters Bridgetown (WA) Pty Ltd

Licence: L8552/2011/11

Registered office: 123 Albany Hwy
KOJONUP WA 6395

ACN: 123 878 697

Premises address: Timber Treaters Bridgetown
444 Hester Road
HESTER WA 6255
Being Lots 10, 11, 12, 13, 14, 15 and 26 on Plan 222567 and Lots 72 and 73 on Plan 216748.

Issue date: Thursday, 25 September 2014

Commencement date: Wednesday, 1 October 2014

Expiry date: Friday, 30 September 2016

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 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: Bradley Cox
Licensing Officer

Decision Document authorised by: Neville Welsh
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 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: Timber preserving	50 000 tonnes per annual period
Application verified	Date: 01/07/2014	
Application fee paid	Date: 22/07/2014	
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

Timber Treaters Bridgetown (Timber Treaters) is a timber preserving business located in Hester, near Bridgetown, in an area zoned 'Industrial'. Surrounding landuse is primarily residential, with housing separated from Timber Treaters by Hester Road on one side and a railway reserve on the other. Blackwood Timber Milling adjoins the eastern side of the property.

Raw pine logs are received and de-barked. They are then stored for up to nine months to reduce moisture content (or dried using a pressure vessel). The dried wood is treated with diluted copper chrome arsenate (CCA) solution in a pressure vessel. The vessel is then opened and the treated timber removed. It is stored on a concrete hardstand for a minimum of 24 hours to dry, with drips draining to a concrete sump. The contents of the concrete sump are used as makeup water for the treatment process.

Most of the premises slopes downwards to a dam, collecting uncontaminated stormwater. The dam has an overflow point, discharging into surface water on the neighbouring property. Emission limits are included in the licence in relation this discharge and monitoring is required for the dam and this discharge.

The main emissions from the premises are discharges to surface water from the dam as well as the generation of solid waste which is disposed of off-site.

DER has converted the licence into REFIRE format for this reissue. During the conversion process, DER has not re-assessed the acceptability or impacts of emissions or discharges from the Premises or re-visited any existing emission control levels with the exception of inserting an improvement condition about auditing the premises against the relevant guidelines. A full licence review of this premises is required, but is not possible at present. Therefore most of the conditions in this licence have been replicated from the previous licence. Future improvement conditions could be included when the licence review is completed to ensure that the premises complies with AS:2843 for Timber preservation plants and the Australian Environmental Guidelines for Copper Chrome Arsenate Timber Preservation Plants, ANZECC, 1996.



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	L1.2.5 L1.3.1 – L1.3.7	OSC NSC	<p>Stormwater has not been reassessed as part of this reissue. The previous condition W1 about diversion of stormwaters has been removed from the new licence and replaced with OSC L1.2.5.</p> <p>NSC L1.3.1-1.3.7 have been included in the premises operation section of the licence to replace conditions in the previous licence (conditions A2, W4, S2). These conditions have not been re-assessed as part of this reissue. Conditions W2 and W3 are covered by SC 1.2.4. Condition S1 of the previous licence has not been included in the reissued licence as it is regulated under the <i>Environmental Protection (Controlled Waste) Regulations 2004</i>.</p>	<p>General provisions of the <i>Environmental Protection Act 1986</i></p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p> <p><i>Environmental Protection (Controlled Waste) Regulations 2004</i></p>
Emissions general	L2.1.1	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.	N/A
Point source emissions to air including	N/A	N/A	There are no point source emissions to air from the premises.	

	point required for emissions to surface water. The monitoring section includes this point plus Dam North and Dam South points as DER is of the view that this monitoring should continue even though it is not an emission point.	
N/A	There are no point source emissions to groundwater from the premises.	
N/A	There are no emissions to land from the premises.	
OSC	Fugitive emissions have not been reassessed as part of this reissue. OSCL2.6.1 and 2.6.2 have been included in the licence to replace condition A1 in the previous licence.	
N/A	Odour has not been reassessed as part of this reissue. As the previous licence did not impose controls on odour, no specified conditions have been included in this section.	
N/A	Noise has not been reassessed as part of this reissue. As the previous licence did not impose controls on noise, no specified conditions have been included in this section.	
OSC	General monitoring conditions have been included due to the requirement to monitor surface water.	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
Monitoring of inputs and outputs	N/A	N/A	Monitoring requirements have not been reassessed as part of this reissue. As the previous licence did not require monitoring of inputs and outputs, no specified conditions have been included in this section.	
Process monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this reissue. As the previous licence did not require process monitoring, no specified conditions have been included in this section.	
Ambient quality monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this reissue. As the previous licence did not require ambient quality monitoring, no specified conditions have been included in this section.	
Meteorological monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this reissue. As the previous licence did not require meteorological monitoring, no specified conditions have been included in this section.	
Improvements	L4.1	OSC	An improvement condition has been added to this licence about auditing the premises to ensure compliance with the relevant environmental guidelines.	N/A
Information	L5.1.1-5.1.4 L5.2.1 L5.3.1		SC 5.2.1 replaces conditions G1 and G2 of the previous licence.	
Licence Duration	N/A	N/A	This is a moderate priority premises. Site visits have identified that some improvements may need to be made to the premises and a full licence review is required in the future. It is recommended that the licence be extended for two years and that the licence review occurs within this time.	



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

