



Application for Works Approval

Part V Division 3 of the *Environmental Protection Act 1986*

Works Approval Number W6438/2020/1

Applicant Boutique Biofertilisers Pty Ltd

ACN 162 847 181

File Number DER2020/000323

Premises Crossman Natural Fertiliser Project
9902 Albany Highway
CROSSMAN WA 6390
Being part of Lot 9 on Plan 4850

As defined by the GPS coordinates provided in, and Premises maps attached to the issued Works Approval

Date of Report 13/11/2020

Decision Works approval granted

Stephen Checker
MANAGER WASTE INDUSTRIES
REGULATORY SERVICES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

This Decision Report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the Premises. As a result of this assessment, Works Approval W6438/2020/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Decision Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary and overview of Premises

On 30 July 2020, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake works relating to the construction and time limited operation of a processing plant for the receipt and processing of solid organic waste materials to produce pelletised fertiliser products at the Premises. The Premises is approximately 15 km north-east of Boddington, and 130 km south-east of Perth.

The Premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in Works Approval W6438/2020/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guidance Statement: Risk Assessments* (DER 2017) are outlined in Works Approval W6438/2020/1.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guidance Statement: Risk Assessments* (DER 2017).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this Decision Report are detailed in Table 1 below. Table 1 also details the proposed control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
<i>Dust</i>	<i>Excavation works, movement of materials and machinery</i>	<i>Air/windborne pathway</i>	<i>Application of Magnesium Chloride dust suppressant;</i>
<i>Noise</i>	<i>Excavation works, movement of materials and machinery</i>	<i>Air/windborne pathway</i>	<i>Limited hours of construction activity; Plant and equipment used in construction will be modern and well maintained to reduce noise emissions</i>
Commissioning			
<i>Dust</i>	<i>Movement of materials and machinery</i>	<i>Air/windborne pathway</i>	<i>Use of enclosed delivery vehicles; Production of non-dusting dry product; Application of Magnesium Chloride dust suppressant to roads; Enclosed plant design; Fine misting/ fogging water sprays with added surfactant to suppress dust; Low speed production process to minimise dust generation; Silo for the storage of the fly-ash will be equipped with a modern reverse pulse bag filter</i>
<i>Noise</i>	<i>Movement of materials and machinery</i>	<i>Air/windborne pathway</i>	<i>Enclosed plant design; Acoustic enclosure of generators; Selection of low-noise equipment;</i>

Emission	Sources	Potential pathways	Proposed controls
Operation			
<i>Dust</i>	<i>Machinery movements, Receipt, and processing of fertilizer feedstock</i>	<i>Air/windborne pathway</i>	<i>Use of enclosed delivery vehicles;</i> <i>Production of non-dusting dry product;</i> <i>Application of Magnesium Chloride dust suppressant to roads;</i> <i>Enclosed plant design;</i> <i>Fine misting/ fogging water sprays with added surfactant to suppress dust;</i> <i>Low speed production process to minimise dust generation;</i> <i>Silo for the storage of the fly-ash will be equipped with a modern reverse pulse bag filter</i>
<i>Noise</i>	<i>Movement of materials and machinery, and processing of fertilizer feedstock</i>	<i>Air/windborne pathway</i>	<i>Siting and separation from sensitive receptors;</i> <i>Enclosed plant design;</i> <i>Acoustic enclosure of generators;</i> <i>Selection of low-noise equipment;</i> <i>3m high earthen bund constructed on the eastern and western boundary of the utilities pad;</i> <i>Storage of materials in sealed bins or hoppers</i>
<i>Odour</i>	<i>Machinery movements, Receipt, and processing of fertilizer feedstock</i>	<i>Air/windborne pathway</i>	<i>Low-speed mixing to minimise odour generation;</i> <i>Incorporation of anhydrous fly ash to product;</i> <i>Storage of materials in sealed bins or hoppers;</i> <i>Plant equipped with a dedicated odour control system;</i>
<i>Sediment and nutrient laden stormwater</i>	<i>Contaminated runoff from within Premises Boundary</i>	<i>Overland runoff</i>	<i>Unlined drainage ponds for general drainage control and a single HDPE lined storm-water catchment pond to retain any storm-water that could potentially have contacted manures;</i> <i>Bunded concrete apron surrounding enclosed process buildings to contain drainage. All storm-water within the bunded apron will be captured in a lined pond and either re-used in the process or directed for controlled irrigation on the surrounding pasture.</i>

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the applicant from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 and Figure 1 **Error! Reference source not found.** below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guidance Statement: Environmental Siting* (DER 2016)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Receptor number	Human receptors	Distance from prescribed activity
H1	Rural residence, 9721 Albany Highway, Crossman	Approximately 500 m north-east of the Premises Boundary
H2	Armoyn nature-based campground, 9721 Albany Highway, Crossman	Approximately 500 m north-east of the Premises Boundary
H3	Rural residence, 9902 Albany Highway, Crossman	Approximately 874 m south of Premises Boundary
H4	Rural residence, South Crossman Road, Crossman	Approximately 1 km south-west of Premises Boundary
H5	Rural residence, 9629 Albany Highway, Crossman	Approximately 1.1 km north-east of the Premises Boundary
H6	Rural residence, South Crossman Road, Crossman	Approximately 2 km north-west of Premises Boundary
	Environmental receptors	Distance from prescribed activity
E1	Crossman River	Approximately 150 m north-east of Premises boundary

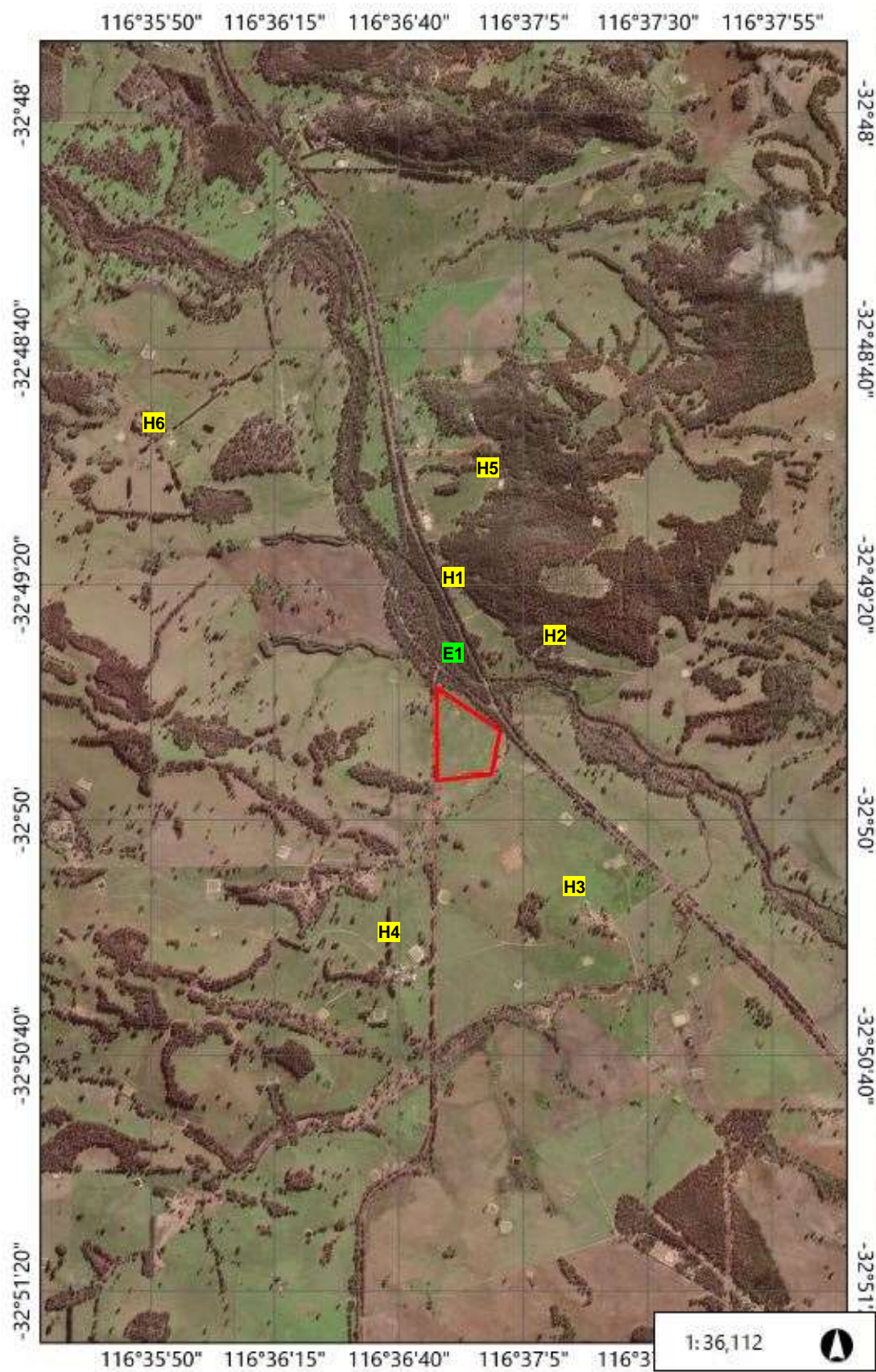


Figure 1: Sensitive human and environmental receptors

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3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Works Approval W6438/2020/1 that accompanies this Decision Report authorises construction and time-limited operations. The conditions in the issued Works Approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the Premises i.e. receipt and processing of waste to produce pelletised fertiliser products. A risk assessment for the operational phase has been included in this Decision Report, however licence conditions will not be finalised until the department assesses the licence application.

Table 3: Risk assessment of potential emissions and discharges from the Premises during construction, commissioning, and operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction								
Excavation works, movement of materials and machinery	Dust	Air/windborne pathway causing impacts to health and amenity	Rural residences and nature-based campground less than 1 km away from Premises Boundary	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 4 and 9	N/A – applicant's proposed controls deemed adequate and adopted in conditions
	Noise			Refer to Section 3.1	C = Minor L = Possible Medium Risk	Y	Conditions 5 and 9	
Commissioning								
Movement of materials and machinery	Dust	Air/windborne pathway causing impacts to health and amenity	Rural residences and nature-based campground less than 1 km away from Premises Boundary	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 4 and 9	N/A – applicant's proposed controls deemed adequate and adopted in conditions
	Noise			Refer to Section 3.1	C = Minor L = Possible Medium Risk		Conditions 5 and 9	

Risk Event					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation <i>(including time-limited-operations operations)</i>								
Machinery movements, Receipt, and processing of fertilizer feedstock	Dust	Air/windborne pathway causing impacts to health and amenity	Rural residences and nature-based campground less than 1 km away from Premises Boundary	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	Conditions 1, 2 and 13	N/A – applicant's proposed controls deemed adequate and adopted in conditions
	Noise	Air/windborne pathway causing impacts to health and amenity	Rural residences and nature-based campground less than 1 km away from Premises Boundary	Refer to Section 3.1	C = Minor L = Possible Medium Risk	Y	Condition 1, 2 and 13	
	Odour	Air/windborne pathway causing impacts to health and amenity	Rural residences and nature-based campground less than 1 km away from Premises Boundary	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition1, 2 and 13	

Risk Event					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	<i>Sediment and nutrient laden stormwater</i>	<i>Overland runoff potentially causing ecosystem disturbance or impacting surface water quality</i>	<i>Crossman river, 150 m north-east of Premises t</i>	<i>Refer to Section 3.1</i>	<i>C = Moderate L = Possible Medium Risk</i>	Y	Conditions 1, 2 and 13	<i>N/A – applicant's proposed controls deemed adequate and adopted in conditions</i>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
<i>Application advertised on the department's website (23/09/2020)</i>	<i>None received</i>	<i>Not applicable</i>
<i>Local Government Authority advised of proposal (23/09/2020)</i>	<i>No response received</i>	<i>Not applicable</i>
<i>Peel-Harvey Catchment Council advised of proposal (23/09/2020)</i>	<i>No response received</i>	<i>Not applicable</i>
<i>Crossman Community and Business Alliance advised of proposal (23/09/2020)</i>	<i>No response received</i>	<i>Not applicable</i>
<i>Applicant was provided with draft documents on (20/10/2020)</i>	<i>Statement of agreement with draft works approval and request that this now proceeds"</i>	<i>Noted</i>

5. Conclusion

Based on the assessment in this Decision Report, the Delegated Officer has determined that a works approval including provisions for the commencement of time limited operations will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.

Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
Application type					
Works approval	<input checked="" type="checkbox"/>				
Licence	<input type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>
		Has the works approval been complied with?		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Has time limited operations under the works approval demonstrated acceptable operations?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Date Report received:			
Renewal	<input type="checkbox"/>	Current licence number:			
Amendment to works approval	<input type="checkbox"/>	Current works approval number:			
Amendment to licence	<input type="checkbox"/>	Current licence number:			
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received		30/07/2020			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Boutique Biofertilisers Pty Ltd (BBPL)			
Premises name		Crossman Natural Fertilizer Project			
Premises location		9902 Albany highway, CROSSMAN			
Local Government Authority		Shire of Boddington			
Application documents					
HPCM file reference number:		DER2020/000323			
Key application documents (additional to application form):		Supporting documentation including: <ul style="list-style-type: none"> • Environmental Noise Survey • Plant Configuration and Production Facility • Plant Site Layout • Fertiliser Plan • Fertiliser Plant – Odour Control Facility • Fuel Storage Facility • Draft Odour Management Plan • Dust Suppression Considerations and Methods 			

Scope of application/assessment		
Summary of proposed activities or changes to existing operations.	<i>Works approval</i> Construction and time-limited operation of pelletised fertiliser plant – reinstatement of previously issued works approval	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Proposed production or design capacity	Proposed changes to the production or design capacity
Category 61A: Solid waste facility	1, 000 tonnes or more per year	N/A
Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	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"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input checked="" type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date: If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.

Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office: Swan Avon / Mid-West Gascoyne / Kwinana Peel / North West / South West / Goldfields / South Coast
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A / possibly contaminated – investigation required (PC–IR) / not contaminated – unrestricted use (NC–UU) / contaminated – restricted use (C–RU) / remediated for restricted use (RRU) / contaminated – remediation required (C–RR) / decontaminated (Decon) Date of classification: N/A