



Licence Number	L7998/2003/3
Licence Holder	Holista CollTech Limited
ACN	094 515 992
Registered business address	Suite 12, Level 1, 11 Ventnor Avenue WEST PERTH WA 6005
Date of amendment	16 March 2017
Prescribed Premises	Category 16: Rendering operations
Premises	Holista Colltech Rendering Facility Boys Home Road PALMER WA 6225 Part of Lot 3001 on Plan 51101

Amendment

The Chief Executive Officer (CEO) of the Department of Environment Regulation (DER) has amended the above licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act and follows.

Date signed: 15 March 2017

Caron Goodbourn

A/Manager Licensing (Process Industries)

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

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

The following DER Guidance Statements have informed the decision made on this amendment

- *Guidance Statement: Regulatory Principles* (July 2015)
- *Guidance Statement: Setting Conditions* (October 2015)
- *Guidance Statement: Decision Making* (November 2016)
- *Guidance Statement: Risk Assessment* (November 2016)
- *Guidance Statement: Environmental Siting* (November 2016)

Amendment Description

On 14 December 2016 Holista CollTech Limited (Licence Holder) submitted an application to DER for an amendment to the Holista CollTech Rendering Facility licence (L7998/2003/3). The licence amendment application relates to the proposed installation of two additional 50,000L above ground wastewater storage tanks and their associated liquid transfer and distribution systems. The Applicant proposes to install the wastewater storage tanks adjacent to two existing 48,000L wastewater storage tanks.

This amendment notice includes conditions authorising the establishment and operation of the tanks and removes conditions of the licence which do not meet the requirements of DER's Guidance Statement: Setting Conditions.

Background

The Application states that the Licence Holder currently produces an average of 30m³ of wastewater per month which is stored in two 48,000L tanks (E1 and E2). Stored wastewater is diluted with freshwater and discharged to the Collie A Power Station water treatment plant for reuse or disposal via the Power Station's marine outfall wastewater disposal pipeline.

Wastewater from the premises is required to meet quality criteria set by the Power Station Operator before being approved for discharge. Due to this requirement, wastewater is only able to be discharged to the Power Station on a batch by batch basis following completion of sampling, analysis and obtaining written approval from the Power Station Operator for the discharge. This process typically takes from five to seven days to complete. Production can potentially be halted if the existing wastewater storage tanks are full and the Licence Holder is awaiting approval to discharge the water to the Power Station.

The Licence Holder has recently increased production at the premises (within the premises design capacity) resulting in the volume of wastewater being generated also increasing. The Licence Holder intends to maintain increased production levels and anticipates wastewater generation to increase to up to 250m³ per month as a result.

Installation of two additional 50,000L wastewater storage tanks will double the wastewater storage volume on site and enable more frequent sampling and analysis of wastewater batches. This will allow the Licence Holder to store and discharge larger volumes of wastewater to the power station and prevent production delays due to lack of wastewater storage.

Proposed Works

The Application indicates that the following works will be undertaken:

- 1) *Installation of two 50,000L above ground vertical storage tanks constructed from leak-proof Linear low-density polyethylene (LLDPE). The tanks will be 4.8m diameter by 3.35m maximum height.*
- 2) *Establishment of a compacted earthen tank foundation constructed from clean sand. The foundation will be approximately 75-100mm thick and extend to at least 300mm beyond the base of the tanks.*
- 3) *Installation of above ground pipework for transfer of water to and from the tanks.*

Other approvals

The Licence Holder has provided the following information relating to other approvals as outlined in Table 1.

Table 1: Relevant approvals

Legislation	Number	Approval
Planning and Development Act 2005	A5443 P084/16 (28 September 2016)	Shire of Collie development approval for two 50,000L wastewater storage tanks.

Location, environmental siting and potential receptors

The premises is located within the Coolangatta Industrial Estate east of the town of Collie. Other land uses in the surrounding area include farming, State Forest, coal mining and power generation. Table 2 below lists the relevant sensitive land uses in the vicinity of the prescribed premises which may be receptors relevant to the proposed amendment.

Table 2: Receptors and distance from prescribed premises

Residential and sensitive premises	Distance from Prescribed Premises
Rural residential premises	Approximately 3.3km north east of the premises boundary
Neighbouring industrial premises – Collie A Power Station	Approximately 550m south east of the premises boundary
Neighbouring industrial premises – Bluewaters Power Station	Approximately 550m south east of the premises boundary
Aboriginal site of significance (Collie River Wagul)	Premises is located within the buffer zone for the Poison Gully Creek site (ID 25023)

Table 3 below lists the relevant environmental receptors in the vicinity of the prescribed premises which may be receptors relevant to the proposed amendment.

Table 3: Environmental receptors and distance from prescribed premises

Environmental receptors	Distance from Prescribed Premises
Collie River East Branch	<p>The Collie River East branch (and tributaries) is located to the north of the premises and flows in a north westerly direction to the main Collie River.</p> <ul style="list-style-type: none"> - 1200m north - 600m north east <p>The watercourse has been affected by mining activity and farming over many years and is generally in poor ecological condition, primarily due to salinity resulting from land clearing. Treated coal mine dewater is currently discharged into the River upstream of the premises (DOW 2009).</p>
Collie River East Branch tributaries and associated Wetland/swamp area (undefined)	Approximately 500m west of the premises boundary.

Risk assessment

Emissions associated with operation of the rendering facility were subject to risk assessment through the Licence assessment for the premises. This amendment notice only considers emissions associated with construction and operation of the two new wastewater storage tanks.

The Delegated Officer considers that there is no risk of emissions associated with installation of two additional wastewater storage tanks due to the lack of nearby sensitive receptors, proximity of the premises to two coal fired power stations and an open cut coal mine, and site works for the proposal being limited to establishing a tank foundation, placing tanks, and installing pipework and power supply

Table 4 below describes the Risk Events which may arise from the amendment application consistent with the *Guidance Statement: Risk Assessments*. The table identifies whether emissions present a material risk to human health or the environment, requiring regulatory controls.

Table 4: Risk assessment for proposed amendments during operation

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	
Source/Activities	Potential Emissions	Potential Receptors	Potential Pathway	Potential Adverse Impacts					
Cat 16: Rendering operations	Operation of two 50,000L wastewater storage tanks	Odour – generated from storage of wastewater containing high nutrient levels	Closest rural residential premises is located 3.3km north east of the premises boundary	Air/ wind dispersion	Amenity impact	Slight	Rare	Low	The Delegated Officer considers that the separation distance between the source and potential receptors is sufficient and wastewater storage tanks are fully enclosed therefore there is low risk of odour causing an amenity impact on sensitive receptors during operation.
		Noise – generated from operation of wastewater pumping infrastructure				Slight	Rare	Low	The Delegated Officer considers that the separation distance between the source and potential receptors is sufficient and noise emissions from adjacent power generation and mining operations far exceed those from the premises therefore there is low risk of noise causing an amenity impact on sensitive receptors during operation. The EP Noise Regulations apply to noise
		Contaminated wastewater - due to loss of containment	Collie River East branch 600m north east of the premises boundary	Discharge directly to land/groundwater Overland flow or sub-surface flow to watercourse/wetland	Land contamination with elevated salt and nutrients. Reduction in	Slight	Unlikely	Low	Wastewater from the premises has elevated levels of salt and nutrients and COD. Due to Collie Power Station's acceptance requirements for wastewater discharge from the premises, the Licence Holder is

			Collie River East branch tributary and associated wetland area 500m west of the premises boundary		wetland ecosystem health and water quality due to elevated nutrients and salinity in wastewater			<p>required to dilute wastewater with freshwater at an approximately 1:1 ratio. The level of contaminants in wastewater stored on the premises is therefore significantly lower than for raw wastewater.</p> <p>The new wastewater storage tanks will be constructed from a single moulded piece to reduce the risk of weakness in the structure. The tanks will be installed with audio and visual high level alarms as well as real time level monitoring during filling and discharging to ensure potential loss of containment is able to be quickly detected and rectified.</p> <p>The maximum wastewater storage volume on the premises with the addition of two 50,000L wastewater storage tanks is 196kL.</p> <p>The Delegated Officer considers that there is a low risk of impacts on wetland ecosystem health and water quality due to the low strength and volume of wastewater stored on the premises, the distance to the receptor and its already impacted state.</p>
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Decision

Having considered the proposed amendment to the licence, the Delegated Officer has determined that the installation and operation of two additional wastewater storage tanks and their associated liquid transfer and distribution systems will not alter the risk of the premises or the type and quantity of waste emitted.

Conditions have been included in the Amendment Notice to authorise the installation of the wastewater storage tanks as specified by the Licence Holder (conditions 1.2.1 and 1.2.2). Licence Holder operational controls for the wastewater storage tanks have also been conditioned (conditions 1.2.3 and 1.2.4) to ensure the risk of loss of containment of wastewater remains low.

The Delegated Officer has also reviewed the conditions of licence L7998/2003/3 and has determined that several conditions are inconsistent with the Guidance Statement: Setting Conditions. As a result the Delegated Officer has determined to remove licence conditions 1.2.1 – 1.2.5, 1.3, 2, 3.2-3.5, 3.7-3.9, 4, and 5.1.2 from L7998/2003/3. Definitions in conditions 1.1.2 have also been updated.

Amendment History

Table 5 provides the amendment history for L7998/2003/3.

Table 5: Amendment history

Instrument	Issued	Amendment
L7998/2003/3	16 March 2017	Amendment Notice 1

Licence Holder's Comments

The Licence Holder was provided with the draft Amendment Notice on 15 February 2017. The Licence Holder provided additional information for the Amendment Notice on 15 March 2017 but did not provide any specific comment on the content of the Amendment Notice.

Amendment

1. The Definitions in section 1.1.2 of the licence are amended by deletion of the text shown in strikethrough below and insertion of the red text shown in underline below.

“Annual Audit Compliance Report” means a report in a format approved by the CEO as presented by the Licence Holder or as specified by the CEO from time to time and published on the Department’s website;

‘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;~~

“CEO” for the purposes of notification means:

Chief Executive Officer
Department Div. 3 Pt. V EP Act
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

“Department” means the department established under s.35 of the Public Sector Management Act 1994 and designated as responsible for the administration of Division 3 Part V of the Environmental Protection Act 1986;

2. The licence is amended by the deletion of the following Conditions 1.2.1 – 1.2.5, 1.3, 2, 3.2-3.5, 3.7-3.9, 4, and 5.1.2:

~~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~~

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

~~2 Emissions~~

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

~~3.2-3.4 Monitoring of point source emissions to air, surface water and groundwater~~

~~There are no specified conditions relating to monitoring of point source emissions to air, surface water or 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.~~

~~3.7 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 improvement conditions in this section.~~

- 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.

3. Schedule 1 of the licence is amended by inclusion of the map Storage Locations, below:

Storage Locations



4. The licence is amended by removal of the Annual Audit Compliance Report template in Schedule 2
5. The licence is amended by the insertion of the red text shown in underline below:

1.2.1 The Licensee must construct the infrastructure in Column 1 of Table 1.2.1 at the Location specified in Column 2 in accordance with the Requirements set out in Column 3.

Table 1.2.1: Infrastructure Requirements Table

<u>Column 1</u>	<u>Column 2</u>	<u>Column 3</u>
<u>Infrastructure</u>	<u>Location</u>	<u>Requirements (design and construction)</u>
<u>Wastewater storage tanks E3 and E4</u>	<u>Adjacent to existing wastewater storage tanks E1 and E2 (refer to Schedule 1: Maps, Storage Locations)</u>	<ol style="list-style-type: none"> 1. <u>Two 50,000L above ground, vertical, sealed tanks.</u> 2. <u>Manufactured as a single moulded piece from, leak-proof Linear low-density polyethylene (LLDPE) in accordance with AS4766.</u> 3. <u>UV stabilised</u> 4. <u>Fitted with an audio and visual high level alarm set at 90% of the tank's capacity</u> 5. <u>Fitted with a low level alarm</u> 6. <u>Fitted with a level gauge suitable for real time monitoring</u> 7. <u>Fitted with an automatic shut off triggered when the tank water level reaches 90% of the tank's capacity</u> 8. <u>Fitted with ball valves for inflow and outflow</u> 9. <u>Fitted with a man hole in the tank roof for maintenance purposes.</u>

1.2.2 The Licensee shall submit a compliance document to the CEO, following the construction of the works. The compliance document shall:

- (a) certify that the works were constructed in accordance with condition 1.2.1;
- (b) provide evidence that the works have been constructed in accordance with conditions 1.2.1; and
- (c) be signed by a person authorised to represent the Licensee and contain the printed name and position of that person within the company.

1.2.3 The Licensee must ensure that the infrastructure and equipment specified in column 1 of Table 1.2.2 are maintained and operated in accordance with the requirements specified in column 2 of Table 1.2.2.

1.2.4 The Licensee must ensure that the equipment and infrastructure specified in column 1 of Table 1.2.2 are maintained in good working order

Table 1.2.2: Operational infrastructure

<u>Column 1</u>	<u>Column 2</u>
<u>Site infrastructure</u>	<u>Operation details</u>
<u>Wastewater storage tanks (E1 – E4)</u>	1. <u>All potentially contaminated storm water and wastewater is directed into</u>

	<p><u>wastewater storage tanks.</u></p> <ol style="list-style-type: none">2. <u>Discharges to and from the wastewater storage tanks are only undertaken when the premises is manned.</u>3. <u>Wastewater storage tanks must be fitted with a high level alarm and automatic shut off.</u>4. <u>When in use, tanks and associated pumping and transfer infrastructure on the premises are to be inspected on a minimum weekly basis for signs of leaks, wear or damage. A record of inspections shall be kept.</u>
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Appendix 1: Key Documents

	Document Title	In text ref	Availability
1	Licence L7998/2003/3 – Holista CollTech	L7998/2003/3	accessed at http://www.der.wa.gov.au
2	Application for Amendment L7998/200/3 – Holista CollTech	Holista CollTech 2016	DER records (A1342999)
3	Response to DER queries for Application for Amendment L7998/200/3 – Holista CollTech	Holista CollTech 2017	DER records (A1394097)
4	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	DER 2015a	accessed at http://www.der.wa.gov.au
5	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	DER 2015b	
6	DER, November 2016, <i>Guidance Statement: Environmental Siting</i> . Department of Environment Regulation, Perth.	DER 2016a	
7	DER, November 2016. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	DER 2016b	
8	DER, November 2016. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	DER 2016c	
9	DOW, August 2009. Upper Collie Water Allocation Plan, Department of Water, Perth	DOW 2009	accessed at http://www.water.wa.gov.au