



Application for licence

Division 3, Part V *Environmental Protection Act 1986*

Licence number	L9454/2024/1
Applicant	Environex International Pty Ltd
ACN	159887117
DWER file number	L9454/2024/1 DER2024/000498
Premises	Environex Pty Ltd 18 Halifax Drive BUNBURY WA 6230 Legal description – Lot 37 on Deposited Plan 13497 As defined by the premises map attached to the Revised licence
Date of report	25/11/2025
Status of report	FINAL

1. Purpose and scope of assessment

Environex International Pty Ltd (the applicant) is seeking to license current operations at its existing premises at 18 Halifax Drive Bunbury. An application to licence the premises was submitted under Division 3 Part V of the *Environmental Protection Act 1986* (EP Act) on 9 September 2024.

This report sets out the delegated officer's assessment of potential risk events arising from emissions and discharges that will be generated during operations at the premises.

In completing the assessment documented in this 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. Application details

Overview of existing premises

The applicant operates an established chemical blending and mixing facility located within the Davenport Light Industrial precinct, approximately 6 kilometres southwest of the City of Bunbury CBD.

The site occupies a 0.63-hectare (1.57-acre) parcel and includes 1,700 square metres of flooring area. The chemical mixing facility comprises designated zones for storage, production, decant and loading, with both liquid and powder blending and mixing conducted in an enclosed shed as well as in an open yard. The premises reports an annual production or design capacity exceeding 500 tonnes but remaining below 5000 tonnes.

Table 1 describes the prescribed premises category that the application is subject to, as defined in Schedule 1 of the Environmental Protection Regulations 1987.

Table 1: Prescribed premises category

Classification of premises	Assessed design capacity (as per application)
Category 33: Chemical blending or mixing: premises on which chemicals or chemical products are mixed, blended or packaged in a manner that causes or is likely to cause a discharge of waste into the environment.	Not more than 5000 tonnes per year.

Background

The premises was previously operated by KLEN International (15 years). Current operations involve the following chemical storage, blending, mixing and waste management activities:

- mixing and storage of powdered and liquid, inert materials and Dangerous Goods class chemicals for liquid cleaning formulations for the food industry;
- mixing and storage of dairy industry cleaning formulations and bulk decanting of acids, alkalis and sodium hypochlorite;
- a wastewater treatment system comprises of holding, settling and pH balance tanks before release to the trade waste sewer
- individual bunded hardstands, and bunded operational areas hold chemicals and wastewater on the site
- stormwater management and disposal system

Facility description

Stormwater management

A single stormwater drain runs 111 metres along the main driveway, comprising eight sequential holding pits (each 0.5 kL) with surface grates, connected by 300 mm pipes for a total capacity of 12.4 kL. The stormwater drain has an outlet to an un-lined stormwater basin;

the outlet is a locked manually operated gate valve kept in the locked position.

A hot-mix bitumen driveway extends through the premises serving as the primary route for vehicles and hazardous chemical loading/unloading. Hardstands along its length—some bunded, some not—store Integrated Bulk Containers (IBC) and bulk tanks containing dangerous goods that pose environmental risks. While some sections have bunding for spill containment, most of the driveway and drainage system remains uncontained, enabling potential chemical ingress through grates, particularly during spills, rain, or operational errors.

Stormwater is pH tested during rain events; compliant water is released into the soak, while non-compliant water (pH outside 6–10) is pumped using a mobile electric pump, to High Density Polyethylene (HDPE) IBCs for storage. This IBC wastewater is then drained via a manual outlet to the main settling/holding tank, which is linked via piping to the pH monitoring and correction system. Probes read water levels in an adjustment tank and dose either sodium hydroxide or sulfuric acid to correct the pH before transferring to a release tank and pump transfer to the Wastewater Treatment System, prior to trade waste discharge.

All stormwater falling on the bitumised driveway part of the site would flow into the central open grate stormwater drain including any spillages of chemical. Chemicals can enter the stormwater system under these conditions and may migrate offsite, risking contamination of nearby land and water.

Corrosive Liquids Tank Farm and Integrated Blending and Package-Filling Facility

The tank farm contains storage of a range of concentrated Class 8 (corrosive) liquids in bulk HDPE tanks - sodium hydroxide solution, hydrochloric acid, nitric acid, sodium hypochlorite solution and sulphuric acid. These materials are unloaded via a tanker and pumped to the storage tanks. A proportion of some of these products are decanted directly into smaller containers (1 kl IBCs, and 205 and 20 litre drums) for direct resale; a proportion of some products are diluted with water and stored in purpose-built blending tanks prior to transfer into smaller vessels for commercial sale. The "Approved Code of Practice" Australian Standard "AS3780-2008 - the storage and handling of corrosive substances" has been applied to this facility as a means of achieving compliance to the Dangerous Goods Safety Act 2004.

Products Blending and Packaging Facility

This facility is comprised of:

- dedicated mixing, blending and handling facilities
- covered partially bunded area for drummed and packaged product storage
- separate packaged flammable goods storeroom
- flammable liquid mixing and storage area

The operational area enables the blending of a range of solvents, adhesive and cleaning products to be carried out - raw materials are contained within 200L drums and final products are transferred into smaller consumer-sized containers for supply to customers. Flammable products are not stored in the mixing building, and the mixing vessels, decanting areas and filling area are connected to a fume-capture system that discharges directly to atmosphere via a 4m stack.

This is a manually operated batch-process facility. It is designed; constructed, operated and licensed; to the requirements of the DG Act and the associated Dangerous Goods (Storage and Handling of Non-explosive s) Regulations 2007.

Wastewater treatment and management

The wastewater treatment system (WWTS) receives liquids from the semi-enclosed shed operational area, contaminated stormwater, and wastewater from the external bunded storage, decant and handling areas. Wastewater generated on site may contain a range of contaminants, including residual corrosive chemicals such as sodium hydroxide, hydrochloric acid, nitric acid, sodium hypochlorite, and sulfuric acid, as well as solvents and cleaning products used during blending and packaging processes. The operational areas involve activities such as chemical mixing, blending, decanting, packaging, and equipment cleaning, all of which can result in the presence of both acidic and alkaline substances, dissolved solids, trace organics, and potentially low concentrations of flammable liquids. The WWTS collects, stores, and treats wastewater from the site before licensed disposal to the trade waste sewer and comprises:

- in ground bulk wastewater holding/settling tank (concrete)
- above ground auxiliary bulk liquid waste storage (HDPE)
- chemical reagent storage, dosing equipment and pH balancing tank (HDPE)
- above ground blending and settling tank (HDPE); and
- above ground discharge tank (to trade waste sewer) (HDPE)

Wastewater from the shed operational areas is captured via internal drains, which feed into the in-ground holding/silt tank located to the rear of the shed, adjacent to the WWTS. Wastewater from the in-ground holding/settling tank is then pumped to the WWTS.

The WWTS consists of in-line tanks; an in-ground holding/settling tank, an above ground primary settling tank, an agitating pH balancing, and a discharge tank to the sewer. The WWTS is positioned on bare soil at the rear of the premises. The pH balancing tank has a pH monitoring and correction system. Probes read water levels in the adjustment tank and dose either sodium hydroxide or sulfuric acid to correct the pH to meet Water Corporation trade waste permit parameters (pH 6-10).

An external partially bunded hardstand area holding miscellaneous 1000L IBC's at the rear of the premises contains liquids awaiting, re-use, or treatment. The IBC liquids are manually tested for pH prior to filling and subsequent transfer to the wastewater treatment system in-ground concrete holding/settling tank.

Acidic and alkaline wastewater from mixing and decanting operational areas is pH tested with a handheld probe, prior to being pumped via a manually operated electric pump to the IBCs. The IBC solutions are then manually drained via a valve on the IBC, to the in-ground holding/settling tank. The settling tank is de-sludged periodically by a licensed company for disposal at an approved treatment plant.

Current controls and containment measures need improvement to prevent chemicals from reaching the environment and affecting sensitive receptors. Improvements are necessary for internal and external storage, as well as for chemical mixing, loading, and transfer areas.

Key Findings

Overall bunding or containment of chemical storage, mixing or transfer areas is inadequate to contain spills or exclude stormwater contamination.

The perimeter bunding in the internal shed work area does not fully contain spills within the shed boundary or direct materials to the internal waste drain and WWTS.

The current bunding for external miscellaneous IBC storage cannot contain spills within the hardstand area. The bunded area's capacity needs to be increased.

The tank farm's liquid chemical storage concrete hardstands show signs of concrete degradation, with a fixed outlet leading to the external bitumen area.

The concrete hardstands used for acid and caustic IBC and drum storage are deteriorating, with a fixed outlet leading to the external bitumen area.

The closed stormwater drainage system collects run-off from chemical storage areas but is not linked to the WWTS and can discharge potentially contaminated water to the on-site unlined stormwater basin, posing a chemical discharge risk to the environment.

The WWTS sits on bare ground, allowing spills and leaks to discharge directly into the soil.

The driveway area represents a critical interface between hazardous material management and environmental receptors within the facility. The uncontained nature of the driveway and the direct exposure of stormwater drainage highlight the need for improved primary and secondary containment.

3. Location

Siting context

The premises is in a light industry zone in Bunbury and consists of a large operational shed with liquid and powder storage, chemical mixing areas, external storage and handling zones, a bitumised transport accessway, and open ground. The rear boundary adjoins a crown reserve and public open space.

Surface water

A permanent surface water feature, Eedles Creek - a 5m-wide open channel drain - runs parallel to the rear boundary in the POS, encircling the light industrial zone and connecting to wetlands, damp lands, and the urban stormwater system.

Receptors

In accordance with the Guideline: Risk assessments (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the licence holder 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 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 (Guideline: Environmental siting (DWER 2020)).

Separation distances

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

Human receptors	Distance from prescribed activity
Residential areas	644 metres west of boundary
Adjacent light industrial premises	2 shared boundaries
Environmental receptors	Distance from activity / prescribed premises
Surface water feature – channel (Eedles Creek) Geomorphic Wetlands, Swan Coastal Plain	3m from boundary
Basin (Dampland), Geomorphic wetland, Swan Coastal Plain	610m from rear boundary
Environmentally Sensitive Area - Vegetation	100m from boundary
Threatened Ecological Community – Banksia Woodlands, Tuart Woodlands	Reserve adjacent to boundary

Threatened Fauna	Reserve adjacent to boundary
Regional Park - Kalgulup	100m to rear of boundary
Groundwater	< 4m seasonally – expression to rear of boundary

4. Risk assessment

Determination of emission, pathway and receptor

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

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.

Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account identified potential source-pathway and receptor linkages. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls, 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 licence 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 the table below.

Risk assessment table

The table below describes the risk events associated with the proposal consistent with the *Guideline: Risk Assessments* (DWER 2020). The table identifies whether the risk events are acceptable and tolerated, or unacceptable and not tolerated, and the appropriate treatment and degree of regulatory control, where required.

Risk Event				Risk rating 1 C = consequence L = likelihood	Reasoning	Regulatory controls
Source/ Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls (from application)			
Internal and external chemical mixing areas. Internal and external chemical storage/holding areas. Sodium Metabisulphite (40w/w%), hypochlorite (12.5w/w%), citric acid (50w/w%), ferric sulphate (40w/w%), caustic alkali, nitric acid Ammonium. Dangerous Goods listed substances: -class 5.1 oxidising -class 8 corrosive -class 3 flammable liquids -hypochlorite solution.	Chemical spillage from liquid and powder transfer, loading or decant process.	There is a risk of adverse impacts on key receptors, including: - surface water feature of Eedles Creek (Geomorphic wetlands of the Swan coastal plain) 3m from rear boundary. - groundwater, <4m bgl seasonally - geomorphic wetland of the Swan Coastal Plain, 3m from rear boundary. - basin (Dampland, Geomorphic wetland of the Swan Coastal Plain) 610m from rear boundary. - residential premises (zoned residential) approximately, 650m WSW rear of boundary - 1 active groundwater licence (draw point), 360m NNW of rear boundary. Pathways: potential seepage or uncontrolled runoff to the stormwater system. Leaks and spills from IBC storage. Leaks and spills from WWTS. Overtopping of containment bunding. Overtopping of unlined stormwater basin and open grate stormwater drainage sumps. Run-off outside of bunded areas to soils and infiltration to groundwater. Uncontained failure of transfer pipelines in external mixing/blending areas causing contamination of soil or entry into stormwater. Tank farm bunding manual outlet valve discharge to stormwater drainage. Impacts: may include chemical contamination, alteration of water quality—such as changes in pH or introduction of oxidising and corrosive substances—and potential harm to aquatic life or downstream users.	Minimal bunding to external storage, loading, transfer and mixing areas, bund water directed to the trade waste sewer. Bunded waste water is drained to a below ground sump, then pumped to an above ground settling tank, then to a pH balancing tank before discharge to the trade waste sewer.	C = Minor – low level impact to amenity and minimal impact to environment at a local scale L = Likely Not likely to occur in some circumstances Low Risk	External storage, loading, transfer, and mixing areas are surrounded by perimeter bunding. Chemicals for site mixing are stored separately in bunded zones based on their use and DG classification. Internal storage, mixing, and blending areas in the main shed lack adequate bunding. More bunding, serving as a primary containment measure, is needed to contain spills and prevent escape. Additionally, secondary containment should be considered to manage any accidental releases that may breach primary barriers. Additional containment measures should be implemented on site to control emissions and discharges from prescribed activities. External IBC storage depots adjacent to the warehouse are currently enclosed by a 50mm concrete roll bund. Both internal and external bunding require enhancements to ensure effective containment of potential spills that may occur during loading, handling, and mixing activities. To achieve an acceptable risk rating, it is necessary to undertake repairs and modifications to specific concrete hardstands, bunds, and the drainage infrastructure. In addition, uncontained spills should occur such as from a tank rupture or during loading or handling—there is a risk that wastewater could enter the stormwater system and subsequently be discharged into the environment through the onsite surface water feature. Provided that the integrity of this infrastructure is enhanced and maintained the ongoing risk of groundwater contamination resulting from operations is considered acceptable.	- Extent of bunding to be expanded to include all areas used for chemical storage, transfer, and mixing, ensuring that no hazardous liquids can escape uncontained during normal operations or foreseeable incidents. - <i>Condition 4, 5, 6.</i> - Repair or replace cracked, degraded, or otherwise compromised concrete bunding. - <i>Condition 2, Table 1.</i> Condition applicant controls for flammable and combustible liquids managed in accordance with AS 1940:2017 - <i>Condition 5.</i>
	Hazardous solutions when mixed: - Sodium Hypochlorite and Acids - Caustic Alkali and Aluminum or Zinc - Oxidising agent and Organic Materials - Ammonia and Hypochlorite	There is a risk of adverse impacts to key receptors, including: - native vegetation: threatened ecological communities (Banksia woodlands of Swan Coastal Plain), ESA and Kalgulup Regional Park ecological linkage located between 0 -100m W of rear boundary - surface water feature of Eedles Creek (Geomorphic wetlands of the Swan coastal plain) 3m from rear boundary - groundwater, <4m bgl seasonally - geomorphic wetland of the Swan Coastal Plain, 3m from rear boundary - basin (Dampland, Geomorphic wetland of the Swan Coastal Plain) 610m from rear boundary - Robertson Wastewater Treatment Plant boundary 40m W of rear boundary - active groundwater licence (draw point) 360m NNW of rear boundary - soil: potential contamination that may compromise land quality and ecosystem health Pathways: leaks and spills from IBC storage. Overtopping of containment bunding. Overtopping from unlined stormwater basin and open grate stormwater drainage sumps. Run-off outside of bunded areas to soils and infiltration to groundwater. Impacts: may include chemical contamination, alteration of water quality—such as changes in pH or introduction of oxidising and corrosive substances—and potential harm to aquatic life or downstream users. Potential for runaway fire and/or tank rupture exceeding bunding containment. Impacts on soil, groundwater, surface water, human	Dedicated partially bunded internal and external storage areas. Dangerous Goods Licence for the storage of corrosive and alkali material. External dedicated flammable goods storage.	C = Major – mid-level or frequent medical treatment L = Unlikely - the risk event will probably not occur in most circumstances Medium Risk		

Risk Event				Risk rating 1 C = consequence L = likelihood	Reasoning	Regulatory controls
Source/ Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls (from application)			
		health from: - Release of chlorine gas - Explosive hydrogen gas - Possible cause of fire/explosion - Forms explosive hydrazine - Potential for runaway fire and/or tank rupture.				
	Odour and vented gases, from product loading, transfer and decanting.	Possible interference with the amenity of workers and public at adjacent premises.	Liquids transfer and decanting, using closed coupling piping and connectors. Dedicated mixing/blending areas within the shed, with flumed hood and air extraction fans venting externally via a 4m unfiltered stack. Dedicated mixing/blending area located externally bulk load hopper and enclosed mixing/blending mechanism.	C = Slight – minimal impacts to amenity at a local scale L = Unlikely – probably not occur in most circumstances Low Risk	All products are low odour and low or nil VOC, with minimal exposure to air. Mixing takes place within closed vessels and transfers via enclosed piping and pumps. The delegated officer has considered the separation distance to receptors, licence holder controls and zoning of the premises and nearby residents (industrial development and rural residential respectively). There have been no substantiated complaints received by the department in relation to odour from the premises. Given the above, the delegated officer does not reasonably foresee offsite impacts from odour from activities on nearby residential receptors.	None specified
	Spills and leaks from bunded and unbunded transfer, loading, storage and decant areas containing: alkaline, acidic, and/or DG class chemical solutions:	There is a risk of adverse impacts to key receptors, including: - Native vegetation, including threatened ecological communities (Banksia woodlands of Swan Coastal Plain), ESA and Kalgulup Regional Park ecological linkage located between 0 -100m W of rear boundary and unlined stormwater basin. - On-site unlined stormwater basin and off-site surface water and/or groundwater(<4m seasonally) - Surface water feature of Eedles Creek, Geomorphic wetlands of the Swan coastal plain: 3m from rear boundary. - Basin (Dampland), Geomorphic wetland of the Swan Coastal Plain: 610m from rear boundary. - Robertson Wastewater treatment plant boundary 40m W of rear boundary. - active groundwater licence (draw point) 360m NNW of rear boundary. Pathway: Leaks and spills from IBC storage entering stormwater drainage. Leaks and spills from WWTS. Overtopping of containment bunding. Overtopping of unlined stormwater basin. Run-off outside of bunded areas to soils and infiltration to groundwater. Uncontained failure of transfer pipelines in external mixing/blending areas causing contamination of soil or entry to stormwater. Tank farm bunding manual outlet valve discharge to stormwater drainage. Impacts: may include chemical contamination, alteration of water quality—such as changes in pH or introduction of oxidising and corrosive substances—and potential harm to aquatic life or downstream users.	Routine inspections of drainage channels and collection sump. When stormwater drainage sumps are observed to contain water, pH testing is conducted. pH value <pH9 or >pH7, released to unlined stormwater basin. When pH >pH9 or <pH7 wastewater is transferred to IBC by mobile manually operated electric pump. When bunded tank areas are observed to contain water from rain and/or leaks/spills, pH testing is conducted. pH value <pH9 or >pH7, released to stormwater drainage via manually operated ball valve at ground level. When pH >pH9 or <pH7 wastewater is transferred to IBC by mobile manually operated electric pump. Scheduled maintenance and inspection maintaining tanks to AS 1940:2017	C = Moderate – low level impacts to the environment on a local scale L = Likely The risk event will probably occur in most circumstances Medium	Wastewater drainage lines serve to connect drainage grates, sumps, and associated piping systems. Contaminating materials stored within bunded areas do not possess secondary containment measures. Spills or leakage may escape the bunded zones due to overtopping, improper handling of spills, deteriorated bunding, or use of manual gate valves. Hazardous materials from bunded areas may be discharged into the open grate stormwater drainage system and reach the unlined stormwater basin, posing an environmental risk. Improving both primary and secondary containment is necessary to mitigate this risk. The wastewater disposal system includes a silt sump in the production area that drains to a 2000L below-ground holding tank. When triggered by an automatic float switch, a pump transfers wastewater to a 2500kL poly balancing tank, then to a pH correction tank, a solids arrestor, and finally into an industrial waste trap managed by the Water Corporation Because the system is manual, routine checks are essential for early issue detection and response. Therefore, these operational controls are included as licence conditions. Improvement conditions have been incorporated into the licence to mandate the construction of secondary containment measures. Improvement conditions address the storage of hazardous materials and dangerous goods at the tank farm on the premises. The potential for environmental impact due to insufficient infrastructure, storage vessels, or bunding containment is a risk that should be assessed and appropriately controlled.	Regular inspections of the wastewater treatment system infrastructure are to be conducted, with detailed records maintained to ensure early identification of any integrity issues. - <i>Condition 1, Table 1, 3.a/b</i> An improvement condition has been established requiring the construction of secondary containment around the central effluent sumps to enhance environmental protection. - <i>Condition 2, Table 2.5</i> Wastewater testing and discharge reports are to be submitted in accordance with regulatory requirements, supporting ongoing compliance. - <i>Condition 3, 4, 6, 13.</i> Environmental compliance reporting must include confirmation that all mandated improvement conditions have been implemented and maintained. - <i>Condition 3, 4, 13.</i>

Risk Event				Risk rating 1 C = consequence L = likelihood	Reasoning	Regulatory controls
Source/ Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls (from application)			
Waste water discharges	Contaminated or potentially contaminated stormwater. Stormwater with the potential to come into contact with chemicals or wastewater material.	There is a risk of adverse impacts to key receptors, including: - On site unlined stormwater basin and off-site surface water and/or groundwater(<4m seasonally) - Native vegetation, including threatened ecological communities (Banksia woodlands of Swan Coastal Plain), ESA and Kalgulup Regional Park ecological linkage, located between 0 -100m W of rear boundary - Residential premises (zoned residential) approximately 650m WSW rear of boundary. - Surface water feature of Eedles Creek, Geomorphic wetlands of the Swan coastal plain: 3m from rear boundary. - Basin (Dampland), Geomorphic wetland of the Swan Coastal Plain: 610m from rear boundary. - Robertson Wastewater Treatment Plant boundary 40m W of rear boundary. - 1 active groundwater licence (draw point) 360m NNW of rear boundary. Pathway: - Seepage/infiltration causing contamination of shallow groundwater - Surface flow and/or spills to unlined stormwater basin at rear of property - Overtopping of unlined stormwater basin - Spills and release of wastewater beyond bunded hardstands Impact: may include chemical contamination, alteration of water quality—such as changes in pH or introduction of oxidising and corrosive substances—and potential harm to aquatic life or downstream users.	- Stop valve on stormwater drainage system outlet at unlined stormwater basin - Bunding to hardstands - Manual gate valves to tank storage hardstands - Internal shed floor in mixing and blending areas is graded to open drainage down the side of the shed, which flows to the main in ground holding/silt tank	C = Moderate – low level impacts to the environment on a local scale L = Likely The risk event will probably occur in most circumstances Medium	The delegated officer understands that potentially contaminated stormwater and runoff from the chemical storage and decant area has been directed to the on-site unlined stormwater basin and to IBCs. The existing premises drainage and stormwater system requires further measures to contain discharges and mitigate the risk of adverse impacts to surrounding land and surface water ecosystems. Other management mechanisms will be required to be incorporated in the licence to ensure the storage facility is operated as constructed to maintain an acceptable level of risk. The Licensing Officer has determined that the storage infrastructure does not meet appropriate construction standards and lacks sufficient secondary containment measures to address potential discharges from the facility. The licence must include management mechanisms to ensure the storage facility operates as designed and maintains acceptable risk levels. Improvement conditions apply to the tank farm and storage of hazardous or dangerous materials on site. The licence now requires the Licensee to prevent contamination and treat any stormwater before discharge when necessary. The delegated officer has considered the separation distance to receptors and licence holder controls and determined that the risk of potentially contaminated stormwater and runoff from the storage, loading and decant of chemicals impacting on nearby receptors is medium.	Require additional primary and secondary containment controls: - Bunding is required for all internal and external operational zones to prevent accidental releases from impacting the surrounding environment. - <i>Condition 2, Table 2.3, 2.4, 2.5, 2.6</i> - The stormwater discharge outlet leading to the unlined stormwater basin must be securely sealed to eliminate pathways for untreated water to enter local ecosystems - <i>Condition 2, Table 2.1</i> - The unlined stormwater basin may be lined with appropriate impermeable materials to prevent seepage into underlying soil and migration of potentially hazardous substances. - The facility's on-site open grate stormwater drainage system must be connected to the Wastewater Treatment System (WWTS) and in-ground silt tank or sump, to ensure that all stormwater is properly collected, treated, and managed before any potential discharge. - <i>Condition 2, Table 2.1</i> - Existing bunding in all operational areas—both internal and external—to be repaired and upgraded as necessary to maintain their functional integrity and compliance. - <i>Condition 2, Table 2.</i> - Operational freeboard requirement of 500 mm must be maintained on the evaporation pond - <i>Condition 1, Table 1.4.c</i>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Guideline: Risk Assessments (DWER 2020).

5. Decision

The delegated officer has determined the proposal to operate the premises with an assessed production capacity of 5000 tonnes may pose risks to groundwater and surface water from the chemical contamination of stormwater through spills and containment failure. These risks, as well as those associated with other aspects of the proposal such as finished goods storage, are considered acceptable provided that appropriate regulatory controls are imposed and maintained.

The use of improvement conditions is justified in which the Delegated Officer has determined it is appropriate to use a licence to authorise improvements. The objective is to require the licence holder to demonstrate that improvement undertakings required under the licence have been completed in accordance with the relevant conditions.

The delegated officer is satisfied with the above controls and monitoring requirements lower the overall risk profile of the premises and are critical for maintaining an acceptable level of risk of impacts during operations; as such they will be imposed on the licence as infrastructure design and operational controls.

6. Conclusion

Based on this assessment, it has been determined an issued licence will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

In accordance with the *Guidance Statement: Licence duration* (DER 2016), the duration of the licence will be 20 years.

7. Consultation

Table 3 provides a summary of the consultation undertaken by the department.

Table 3: Consultation

Consultation method	Comments received	Department response
Notification of a received licence application L9454/2024/1 was advertised for public comment on the Department's website and West Australian newspaper, on 4 November 2024.	No comments were received.	-
Licence applicant was provided with draft documents on 10 October 2025.	No comments were received from the applicant.	Grant licence
Notification of granted final instrument and decision report sent to the City of Bunbury at the time of issue.	-	-

8. References

1. Department of Water and Environmental Regulation (DWER) 2022, August, **Application form: Works approval, licence, renewal, amendment, or registration (Version 16)**. Perth, Western Australia: Author, [DWER Licences and Works Approvals - Prescribed Premises](#)
2. Department of Water and Environmental Regulation (2024), Public Notices, *Chemical blending or mixing: Environex International Pty Ltd (Environex International Bunbury), DAVENPORT (L9454/2024/1)* [Publicly advertised application for licence](#)
3. Department of Energy, Mines, Industry Regulation and Safety. (2023). *Dangerous goods site licence DGS021709 [Licence]*, [DEMIRS - Dangerous Goods Licence](#), Perth, Western Australia: Author.
4. Email: Ellis, T. (28 February 2025). Response to Department Request For Information. Department of Water and Environmental Regulation. [Internal email correspondence].
5. Email: Ellis, T. (04 April 2025). Clarification of proposed improvements. Department of Water and Environmental Regulation. [Internal email correspondence].
6. Standards Australia (2017), AS 1940:2017 – *Storage and Handling of Flammable and Combustible Liquids*, Sydney, Australia Standards Australia. [AS 1940:2017 - Storage and Handling of Flammable and Combustible Liquids](#)
7. Standards Australia (2023), AS 3780:2023 – *Storage and Handling of Corrosive Substances*, Sydney, Australia: Standards Australia, [AS 3780:2023 - Storage and Handling of Corrosive Substances](#)
8. Water Corporation. (n.d.). Trade waste sewer licence. Perth, Western Australia: Water Corporation. Retrieved from <https://www.watercorporation.com.au/Help-and-advice/Trade-waste>
9. Water Corporation [Acceptance-criteria.pdf](#)

Figure 1: Environex site layout plan (Environex Bunbury 10/2024)

