



Licence Number	L9057/2017/1	
Licence Holder	Enviroclean (WA) Pty Ltd	
ACN	099 515 849	
Registered business address	34 Berndale Way DUNCRAIG WA 6023	
File Number	DER2017/000715	
Duration	02/08/2017 to	01/08/2037
Date of issue	1 August 2017	
Prescribed Premises	Category 39	
Premises	Enviroclean (WA) Bibra Lake Unit 1, 34 Sphinx Way. BIBRA LAKE Legal description - Part of Lot 2012 on Deposited Plan 73091 Being Lot 6 on Strata Plan 70834	

This Licence is granted to the Licence Holder, subject to the following conditions, on 1 August 2017, by:

Date signed: 1 August 2017

Caron Goodbourn

A/Manager Licensing, Industry Regulation (Process Industries)

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

Explanatory notes

These explanatory notes do not form part of this Licence.

Defined terms

Definition of terms used in this Licence can be found at the end of this Licence. Terms which are defined have the first letter of each word capitalised throughout this Licence.

Department of Water and Environmental Regulation

The Department of Water and Environmental Regulation (DWER) is established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V, Division 3 of the *Environmental Protection Act 1986 (WA)* (EP Act). The Department also monitors and audits compliance with licences, takes enforcement action and develops and implements licensing and industry regulation policy.

Licence

Section 56 of the EP Act provides that an occupier of Prescribed Premises commits an offence if Emissions are caused or increased, or permitted to be caused or increased, or Waste, noise, odour or electromagnetic radiation is altered, or permitted to be altered, from Prescribed Premises, except in accordance with a works approval or licence.

Categories of Prescribed Premises are defined in Schedule 1 of the *Environment Protection Regulations 1987 (WA)* (EP Regulations).

This Licence does not authorise any activity which may be a breach of the requirements of another statutory authority including, but not limited to the following:

- conditions imposed by the Minister for Environment under Part IV of the EP Act;
- conditions imposed by DWER for the clearing of native vegetation under Part V, Division 2 of the EP Act;
- any requirements under the *Waste Avoidance and Resource Recovery Act 2007*;
- any requirements under the *Environmental Protection (Controlled Waste) Regulations 2004*; and
- any other requirements specified through State legislation.

It is the responsibility of the Licence Holder to ensure that any action or activity referred to in this Licence is permitted by, and is carried out in compliance with, other statutory requirements.

The Licence Holder must comply with the Licence. Contravening a Licence Condition is an offence under s.58 of the EP Act.

Responsibilities of a Licence Holder

Separate to the requirements of this Licence, general obligations of Licence Holders are set out in the EP Act and the regulations made under the EP Act. For example, the Licence Holder must comply with the following provisions of the EP Act:

- the duties of an occupier under section 61; and
- 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 (s.53).

Strict penalties apply for offences under the EP Act.

[Reporting of incidents](#)

The Licence Holder has a duty to report to DWER all discharges of waste that have caused or are likely to cause Pollution, Material Environmental Harm or Serious Environmental Harm, in accordance with s.72 of the EP Act.

[Offences and defences](#)

The EP Act and its regulations set out a number of offences, including:

- Offence of emitting an Unreasonable Emission from any Premises under s.49.
- Offence of causing Pollution under s.49.
- Offence of dumping Waste under s.49A.
- Offence of discharging Waste in circumstances likely to cause Pollution under s.50.
- Offence of causing Serious Environmental Harm (s.50A) or Material Environmental Harm (s.50B).
- Offence of causing Emissions which do not comply with prescribed standards (s.51).
- Offences relating to Emissions or Discharges under regulations prescribed under the EP Act, including materials discharged under the *Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)*.
- Offences relating to noise under the *Environmental Protection (Noise) Regulations 1997 (WA)*.

Section 53 of the EP Act provides that a Licence Holder commits an offence if Emissions are caused, or altered from a Prescribed Premises unless done in accordance with a Works Approval, Licence or the requirements of a Closure Notice or an Environmental Protection Notice.

Defences to certain offences may be available to a Licence Holder and these are set out in the EP Act. Section 74A(b)(iv) provides that it is a defence to an offence for causing Pollution, in respect of an Emission, or for causing Serious Environmental Harm or Material Environmental Harm, or for discharging or abandoning Waste in water to which the public has access, if the Licence Holder can prove that an Emission or Discharge occurred in accordance with a Licence.

This Licence specifies the Emissions and Discharges, and the limits and Conditions which must be satisfied in respect of Specified Emissions and Discharges, in order for the defence to offence provision to be available.

[Authorised Emissions and Discharges](#)

The Specified and General Emissions and Discharges from Primary Activities conducted on the Prescribed Premises are authorised to be conducted in accordance with the Conditions of this Licence.

Emissions and Discharges caused from other activities not related to the Primary Activities at the Premises have not been Conditioned in this Licence. Emissions and Discharges from other activities at the Premises are subject to the general provisions of the EP Act.

[Amendment of licence](#)

The Licence Holder can apply to amend the Conditions of this Licence under s.59 of the EP Act. An application form for this purpose is available from DWER.

The CEO may also amend the Conditions of this Licence at any time on the initiative of the CEO without an application being made.

Amendment Notices constitute written notice of the amendment in accordance with s.59B(9) of the EP Act.

Duration of Licence

The Licence will remain in force for the duration set out on the first page of this Licence or until it is surrendered, suspended or revoked in accordance with s.59A of the EP Act.

Suspension or revocation

The CEO may suspend or revoke this Licence in accordance with s.59A of the EP Act.

Fees

The Licence Holder must pay an annual licence fee. Late payment of annual licence fees may result in the licence ceasing to have effect. A licence that has ceased to have effect due to non-payment of annual licence fees continues to exist; however, it ceases to provide a defence to an offence under s.74A of the EP Act.

Late fees are a component of annual licence fees and should a Licence Holder fail to pay late fees within the time specified the licence will similarly cease to have effect.

Definitions and interpretation

Definitions

In this Licence, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
Books	has the same meaning given to that term under the EP Act.
ACN	Australian Company Number
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 33 Cloisters Square PERTH WA 6850 info-der@dwer.wa.gov.au
Compliance Report	means a report in a format approved by the CEO as presented by the Licence Holder or as specified by the CEO (guidelines and templates may be available on the Department's website).
Amendment Notice	means an amendment granted under s.59 of the EP Act in accordance with the procedure set out in s.59B of the EP Act.
Annual Period	means a 12 month period commencing from 1 July until 30 June.
Condition	means a condition to which this Licence is subject under s.62 of the EP Act.
Department	means the department established under s.35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
Department Request	means a request for Books or other sources of information to be produced, made by an Inspector or the CEO to the Licence Holder in writing and sent to the Licence Holder's address for notifications, as described at the front of this Licence, in relation to: <ul style="list-style-type: none"> (a) compliance with the EP Act or this Licence; (b) the Books or other sources of information maintained in accordance with this Licence; or (c) the Books or other sources of information relating to Emissions from the Premises.
Discharge	has the same meaning given to that term under the EP Act.

DWER	Department of Water and Environmental Regulation As of 1 July 2017, The Department of Environment Regulation (DER). The Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation.
Emission	has the same meaning given to that term under the EP Act.
Environmental Harm	has the same meaning given to that term under the EP Act.
EP Act	means the <i>Environmental Protection Act 1986</i> (WA).
EP Regulations	means the <i>Environmental Protection Regulations 1987</i> (WA).
IBC	means Intermediate Bulk Container
Implementation Agreement or Decision	has the same meaning given to that term under the EP Act.
Inspector	means an inspector appointed by the CEO in accordance with s.88 of the EP Act.
Licence	refers to this document, which evidences the grant of a Licence by the CEO under s.57 of the EP Act, subject to the Conditions.
Licence Holder	refers to the occupier of the premises being the person to whom this Licence has been granted, as specified at the front of this Licence.
Material Change	means a change to the activities carried out on the Premises as described by the Primary Activities set out in Schedule 2 and that may result in an increased risk to public health, amenity or the environment.
Material Environmental Harm	has the same meaning given to that term under the EP Act.
Pollution	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Licence applies, as specified at the front of this Licence and as shown on the map in Schedule 1 to this Licence.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Primary Activities	refers to the Prescribed Premises activities listed on the front of this Licence as described in Schedule 2, at the locations shown in Schedule 1.

Reportable Event	means an exceedance above the target limit specified in Column 4 of Table 6, in Schedule 3.
Serious Environmental Harm	has the same meaning given to that term under the EP Act.
Solvent	Narrow cut kerosene
Unreasonable Emission	has the same meaning given to that term under the EP Act.
Waste	has the same meaning given to that term under the EP Act.
Waste Solvent	A mixture of narrow cut kerosene, oil, water and a small amount of other contaminants recovered from parts washing machines

Interpretation

In this Licence:

- (a) the words 'including', 'includes' and 'include' will be read as if followed by the words 'without limitation';
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a Condition, each row in a table constitutes a separate Condition;
- (d) any reference to an Australian or other standard, guideline or code of practice in this Licence means the version of the standard, guideline or code of practice in force at the time of granting of this Licence and includes any amendments to the standard, guideline or code of practice which may occur from time to time during the course of the Licence; and
- (e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act.

Conditions

Specified Actions

1. The Licence Holder shall only accept waste on to the Premises if:
 - (a) it is of a type listed in Table 2
 - (b) the quantity accepted is below any quantity limit listed in Table 2 and;
 - (c) meets any specifications listed in Table 2

Table 2: Waste Acceptance Criteria

Waste acceptance			
Waste type	Quantity limit Kilolitres per annual period)	Description	Specification
Waste Solvent	100	Stored in 1 Kilolitre IBCs or smaller containers	None specified

2. The Licence Holder shall immediately remove and dispose of any liquid resulting from spills or leaks of chemicals including fuel, oil or other hydrocarbons, whether inside or outside the low permeability compound(s).
3. The Licence Holder shall ensure that not more than 60 Kilolitres in total of solvent and waste solvent is stored on the premises at any one time.

Emissions

4. The Licence Holder must not cause any Emissions from the Primary Activities on the Premises except for specified Emissions and general Emissions described in Column 1 of Table 3 subject to the exclusions, limitations or requirements specified in Column 2 of Table 3.

Table 3: Authorised Emissions table

Column 1	Column 2
Emission type	Exclusions/Limitations/Requirements
Specified Emissions	
Nil	Not Applicable
General Emissions (excluding Specified Emissions)	
Emissions which: <ul style="list-style-type: none"> • arise from the Primary Activities set out in Schedule 2; or • arise from a Material Change 	Emissions excluded from General Emissions are: <ul style="list-style-type: none"> • Unreasonable Emissions; or • Emissions that result in, or are likely to result in, Pollution, Material

Column 1	Column 2
Emission type	Exclusions/Limitations/Requirements
(except where Condition 8 applies).	<p>Environmental Harm or Serious Environmental Harm; or</p> <ul style="list-style-type: none"> • Discharges of Waste in circumstances likely to cause Pollution; or • Emissions that result, or are likely to result in, the Discharge or abandonment of Waste in water to which the public has access; or • Emissions or Discharges which do not comply with an Approved Policy; or • Emissions or Discharges which do not comply with a prescribed standard; or • Emissions or Discharges which do not comply with the conditions in an Implementation Agreement or Decision; or • Emissions or Discharges the subject of offences under regulations prescribed under the EP Act, including materials discharged under the Environmental Protection (<i>Unauthorised Discharges</i>) Regulations 2004.

Infrastructure and Equipment

5. The Licence Holder must ensure that the infrastructure and equipment specified in Column 1 of Table 4 is maintained in good working order and operated in accordance with the requirements specified in Column 2 of Table 4.

Table 4: Infrastructure and equipment controls table

Column 1	Column 2
Site infrastructure and equipment	Operational requirements
Steam distillation equipment	<ol style="list-style-type: none"> 1. The Licence Holder shall maintain and operate the steam distillation equipment so as not to cause unreasonable emissions of odour. 2. The licence holder shall ensure that if the distillation equipment emits odours

Column 1	Column 2
Site infrastructure and equipment	Operational requirements
	likely to cause an unreasonable emission distillation will immediately cease.
Solvent storage Bunding	The licence holder shall ensure that all solvent and liquid wastes are stored within the storage bund.
Building bund at entrances to the building	The licence holder to maintain the building bunds to prevent escape of liquids

Notification of Material Change

6. In accordance with Regulation 5M of the EP Regulations, the Licence Holder must notify the CEO of any Material Change no later than 14 days after that Material Change occurred and such notification (which the CEO will make publicly available) must:

- (a) be in writing;
- (b) include details of the changes, including duration, infrastructure details (if any); and
- (c) include a risk analysis of the changes, including proposed controls to mitigate risks.

Nothing in this Condition constitutes a defence to offences under the EP Act.

7. The Licence Holder must provide to the CEO any additional information the CEO may reasonably require to assess the Material Change under Condition 6 and in order for the CEO to determine if an amendment is required under the EP Act.
8. The Licence Holder must cease carrying out, or modify, a Material Change in the manner and at the time required by the CEO if:
- (a) the CEO forms the view, acting reasonably, that the Material Change has or may have an unacceptable impact on public health, amenity or the environment; and
 - (b) the CEO has provided written notice (which the CEO will make publicly available) to the Licence Holder specifying the grounds for the CEO's views.

Nothing in this Condition prevents the Licence Holder subsequently submitting an application for an amendment in relation to the Material Change.

Information

9. The Licence Holder must maintain accurate and auditable Books including the following records, information, reports and data required by this Licence:
- (a) the calculation of fees payable in respect of this Licence;
 - (b) a monthly summary of waste solvent received at the premises and clean solvent dispatched from the premises

- (c) complaints received under Condition 10 of this Licence; and
- (d) any Material Change.

In addition, the Books must:

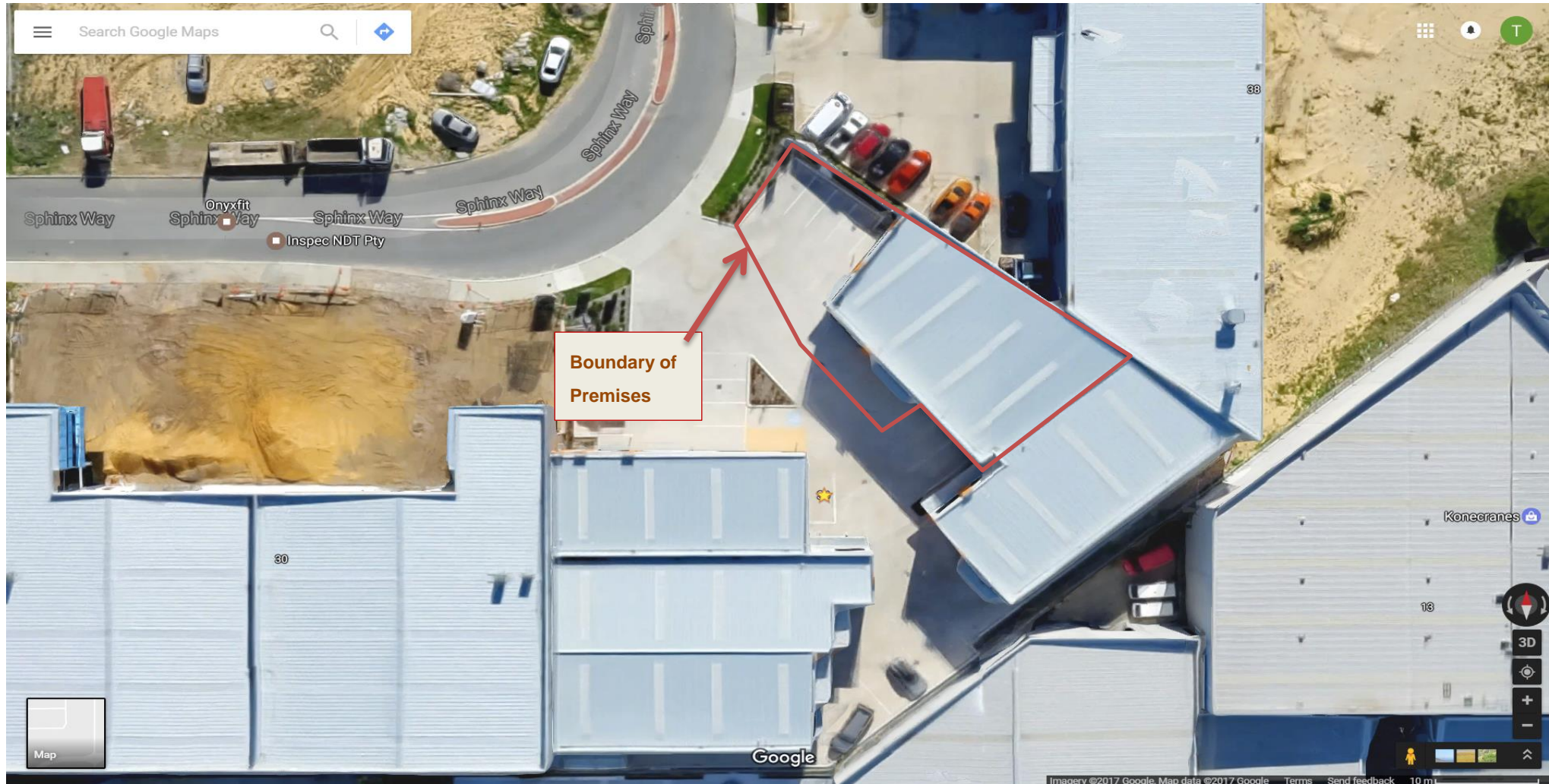
- (e) be legible;
- (f) if amended, be amended in such a way that the original and subsequent amendments remain legible and are capable of retrieval;
- (g) be retained for at least 3 years from the date the Books were made; and
- (h) be available to be produced to an Inspector or the CEO.

- 10.** The Licence Holder must record the number and details of any complaints received by the Licence Holder relating to its obligations under this Licence and its compliance with Part V of the EP Act at the Premises, and any action taken by the Licence Holder in response to the complaint. Details of complaints must include:
 - (a) an accurate record of the concerns or issues raised, for example a copy of any written complaint or a written note of any verbal complaints made;
 - (b) the name and contact details of the complainant, if provided by the complainant;
 - (c) the date of the complaint; and
 - (d) the details and dates of the actions taken by the Licence Holder in response to the complaints.
- 11.** The Licence Holder must submit to the CEO, no later than 28 July, a Compliance Report indicating the extent to which the Licence Holder has complied with the Conditions in this Licence for the preceding Annual Period.
- 12.** The License Holder must submit to the CEO no later than 28 July, an Annual Environmental Report. The Annual Environmental Report must include:
 - (a) the monthly summary required by Condition 9 (b); and;
 - (b) a summary of complaints data recorded in accordance with Condition 10
- 13.** The Licence Holder must comply with a Department Request, within 14 days from the date of the Department Request or such other period as agreed to by the Inspector or the CEO.

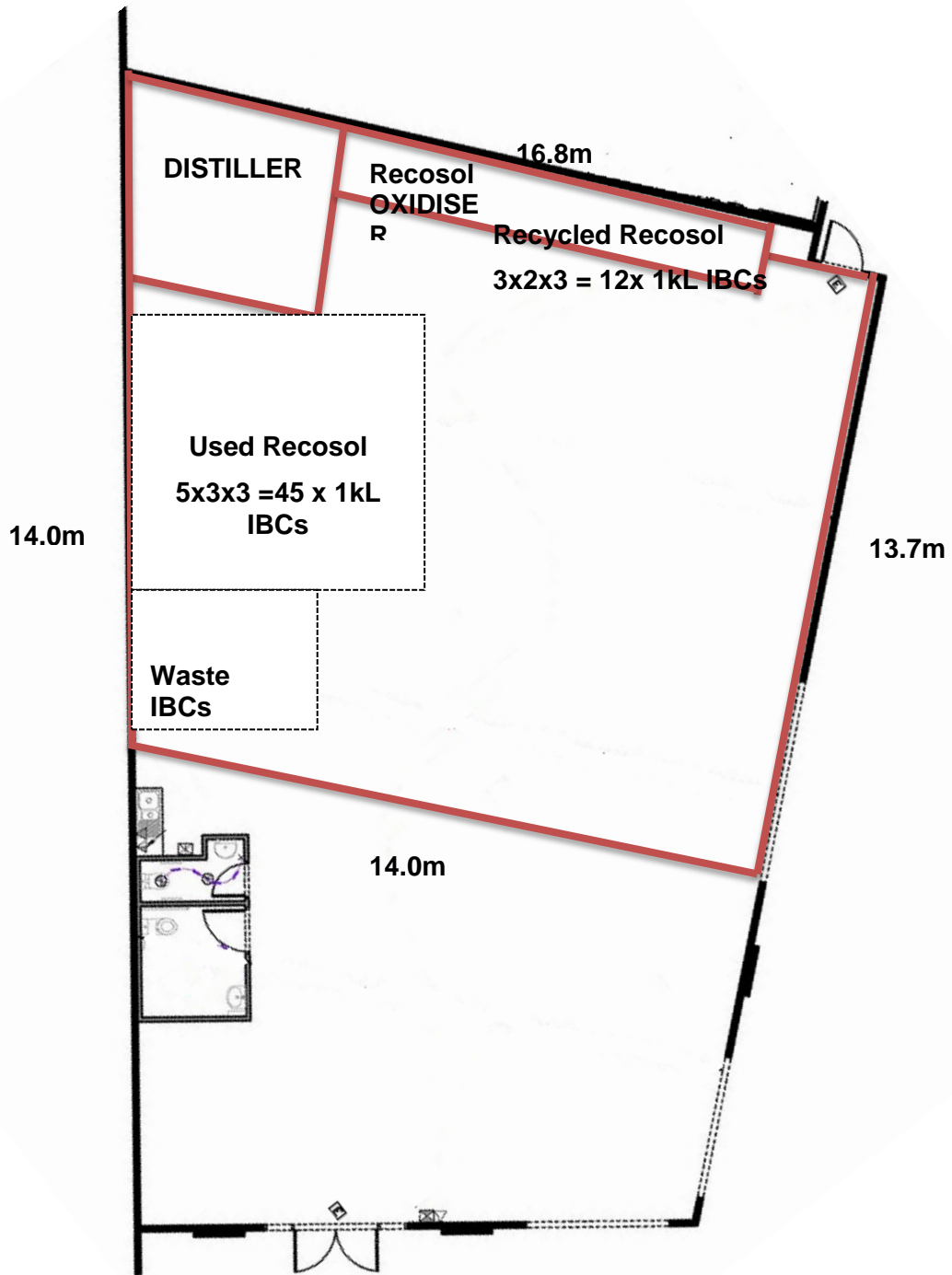
Schedule 1: Maps

Premises map


The Premises are shown in the map below.



Site Plan



ENVIROCLEAN LAYOUT:

 5 cm high bunding

Bund Volume ~ $0.1 \times 14 \times 15 \sim 21\text{m}^3$

Schedule 2: Primary Activities

At the time of assessment, Emissions and Discharges from the following Primary Activities were considered in the determination of the risk and related Conditions for the Premises.

The Primary Activities are listed in Table 5:

Table 5: Primary Activities

Primary Activity	Premises production or design capacity
Category 39 – Chemical or oil recycling: premises on which waste liquid hydrocarbons or chemicals are refined, purified, reformed, separated or processed.	100 Kilolitres per annual period

Infrastructure and equipment

The Primary Activity infrastructure and equipment situated on the Premises is listed in Table 6.

Table 6: Infrastructure and equipment

Infrastructure and equipment	Plan reference
Distillation Unit	Site Plan Schedule 1
Bunds constructed around chemical storage and process area in accordance with section 4.4.3 of <i>AS1940-2004 The storage and handling of flammable and combustible liquids</i> .	Site Plan Schedule 1
Trafficable bund installed across shed entrance to contain spillages within the shed	Site Plan Schedule 1

Site layout

The Primary Activity infrastructure and equipment is set out on the Premises in accordance with the site layout specified on the Premises map in Schedule 1.



Application for Licence

Division 3, Part V *Environmental Protection Act 1986*

Licence Number	W6053/2017/1, L9057/2017/1
Applicant	Enviroclean (WA) Pty Ltd
ACN	099 515 849
File Number	DER2017/000715
Premises	Enviroclean (WA) Bibra Lake Unit 1, 34 Sphinx Way. BIBRA LAKE Legal description - Part of Lot 2012 on Deposited Plan 73091 Being Lot 6 on Strata Plan 70834
Date of Report	1 August 2017
Status of Report	Final

Table of Contents

1. Definitions of terms and acronyms	1
2. Purpose and scope of assessment	2
3. Background	2
4. Overview of Premises	3
4.1 Operational aspects	3
4.2 Infrastructure	3
4.3 Contaminated sites	3
4.4 Other relevant approvals	3
4.4.1 Planning approvals	4
4.5 Part V of the EP Act	4
4.5.1 Applicable regulations, standards and guidelines	4
5. Consultation	4
6. Location and siting	4
6.1 Siting context	4
6.2 Residential and sensitive Premises	4
6.3 Specified ecosystems	4
6.4 Groundwater and water sources	5
6.5 Soil type	5
7. Risk assessment	6
7.1 Determination of emission, pathway and receptor	6
7.2 Consequence and likelihood of risk events	10
7.3 Acceptability and treatment of Risk Event	11
7.4 Risk Assessment – Leaks or spills of hazardous materials	11
7.4.1 Description of leaks or spills of hazardous materials (operation)	11
7.4.2 Description of potential adverse impact from the emission	11
7.4.3 Criteria for assessment	11
7.4.4 Applicant/ controls	11
7.4.5 Key findings	12
7.4.6 Consequence	12
7.4.7 Likelihood of Impact from Leaks and spills of Hazardous Materials	12
7.4.8 Overall rating of leaks and spills of hazardous materials	12
7.5 Risk Assessment - Odour (Operation)	13
7.5.1 Description of Odour	13
7.5.2 Identification and general characterisation of emission	13
7.5.3 Description of potential adverse impacts form the emission	13
7.5.4 Criteria for assessment	13

7.5.5	Applicant controls	13
7.5.6	Key findings.....	13
7.5.7	Consequence	14
7.5.8	Likelihood of consequence	14
7.5.9	Overall rating.....	14
7.6	Summary of acceptability and treatment of Risk Events	14
8.	Regulatory controls	15
8.1	Works Approval controls.....	15
8.1.1	Spill infrastructure and equipment	15
8.1.2	Odour control infrastructure and Equipment	16
8.2	Licence controls	16
8.2.1	Specified actions	16
9.	Determination of Works Approval and Licence conditions	16
10.	Applicant's comments.....	18
11.	Works Approval compliance.....	18
12.	Conclusion	18

Appendix 1: Key documents

Appendix 2: Summary of applicant's comments on risk assessment and draft conditions

Attachment 1: Issued Works Approval W6053/2017/1

Table 1: Definitions	1
Table 2: Prescribed Premises Categories in the Existing Licence	3
Table 3: Enviroclean (WA) Bibra Lake facility Category 39 infrastructure	3
Table 4: Receptors and distance from activity boundary	4
Table 5: Environmental values	5
Table 6: Groundwater and water sources.....	5
Table 7. Identification of emissions, pathway and receptors <i>during construction</i>	6
Table 8: Identification of emissions, pathway and receptors <i>during operation</i>	7
Table 9: Risk rating matrix	10
Table 10: Risk criteria table.....	10
Table 11: Risk treatment table	11
Table 12: Applicant's proposed controls for leaks or spills of hazardous materials.....	12
Table 13: Applicant controls for odour emissions	13
Table 14: Risk rating of emissions.....	14
Table 15: Summary of regulatory controls to be applied in works approval and licence	15
Table 16: Summary of conditions to be applied.....	17

1. Definitions of terms and acronyms

In this Decision Report, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
AACR	Annual Audit Compliance Report
ACN	Australian Company Number
AER	Annual Environment Report
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CS Act	<i>Contaminated Sites Act 2003 (WA)</i>
DWER	Department of Water and Environmental Regulation As of 1 July 2017, The Department of Environment Regulation (DER). The Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation.
Decision Report	refers to this document.
Delegated Officer	an officer under section 20 of the EP Act.
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
m ³	cubic metres
NEPM	National Environmental Protection Measure
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	has the same meaning given to that term under the EP Act.
OEPA	Office of the Environment Protection Authority
PM	Particulate Matter
PM ₁₀	used to describe particulate matter that is smaller than 10 microns (µm) in diameter
Prescribed Premises	has the same meaning given to that term under the EP Act.

Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report
Review	this Licence review
Licence	the Licence issued under Part V, Division 3 of the EP Act following the submission of the works approval compliance certificate.
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>
Solvent	Narrow cut kerosene
UDR	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i>
µg/m ³	micrograms per cubic metre
µg/L	micrograms per litre
Waste Solvent	A mixture of narrow cut kerosene, oil, water and a small amount of other contaminants recovered from parts washing machines

2. Purpose and scope of assessment

This assessment has been conducted as a result of an application for a works approval and licence by Enviroclean (WA) PTY LTD (the Applicant) to construct a Solvent Recycling Facility (SRF) at Unit 1/34 Sphinx Way, Bibra Lake. The application relates to the installation of chemical storage areas and distilling equipment within an existing building. The site has not been previously been a prescribed premises under the EP Act.

The applicant submitted a concurrent Works Approval and Licence application.

The application included supporting information relating to the proposed activities:

- Works associated with setting up the facility including constructing impervious bunded storage areas for solvent and installing distilling equipment (also within a bund) within an existing shed;
- Commissioning activities and the risk of emissions from commissioning activities; to determine specific regulatory controls for a licence.

3. Background

The Applicant operates a similar facility in Howson Way, Bibra Lake. The Applicant intends to move current operations to the new Premises in Sphinx Way.

The SRF is to clean waste solvent collected from parts washing machines that the Applicant leases to workshops and factories. The waste solvent is collected from the client premises and replaced with clean solvent.

The Applicant applied for a concurrent works approval and licence for a facility with a design capacity to recycle up to 75 KI per annum. The Delegated Officer has determined that *Category 39: Chemical or oil recycling* applies to the proposed activities at the site.

A description of the prescribed premises category which applies to this application, as defined in Schedule 1 of the Environmental Protections Regulations 1987, is presented in Table 3 lists the prescribed premises categories that have been applied for.

Table 2: Prescribed Premises Categories in the Existing Licence

Classification of Premises	Description	Approved Premises production or design capacity or throughput
Category 39	Chemical or oil recycling: premises on which waste liquid hydrocarbons or chemicals are refined, purified, reformed, separated or processed.	100 000 litres per annual period.

4. Overview of Premises

4.1 Operational aspects

The facility treats waste solvent to make it suitable for re-use.

Light oil and accumulated solids are separated from the waste solvent by decantation.

The remaining waste solvent is separated from heavy oil and grease by steam distillation at atmospheric pressure. This process achieves evaporation at lower temperatures.

The heating surface is kept clean by sacrificial brass scrapers to prevent carbonisation and reduce the potential for odour emissions.

4.2 Infrastructure

The kerosene recovery facility infrastructure, as it relates to Category 39 activities, is detailed in Table 3 and with reference to the Site Plan (attached in the Works Approval and draft Licence).

Table 4 lists infrastructure associated with each prescribed premises category.

Table 3: Enviroclean (WA) Bibra Lake facility Category 39 infrastructure

	Infrastructure	Site Plan Reference
	Prescribed Activity Category 39	
Kerosene recovered from part washing machines is stored and distilled on site and then loaded onto trucks for redistribution to the workshops with part washing machines.		
1	Existing enclosed factory unit	Site Layout on Issued works Approval Schedule 1
2	Existing Concrete Hardstand inside the factory unit	
3	Distillation Unit located within factory unit	
4	Bund(s) to contain distillation unit and solvent storage area	
5	Bund at entrance to the factory unit	
6	Chemical storage area located...	

4.3 Contaminated sites

The Premises is not registered as a contaminated site under the *Contaminated Sites Act 2003*.

4.4 Other relevant approvals

4.4.1 Planning approvals

An approval to commence development was received from the City of Cockburn on 29 June 2017 (REF No: 6022734 - DA17/0367).

4.5 Part V of the EP Act

4.5.1 Applicable regulations, standards and guidelines

The overarching legislative framework of this assessment is the EP Act and EP Regulations. DWER guidance statements which inform this assessment are:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Publication of Annual Audit Compliance Reports (May 2016)*
- *Guidance Statement: Decision Making (November 2016)*
- *Guidance Statement: Risk Assessments (November 2016)*
- *Guidance Statement: Environmental Siting (November 2016)*

5. Consultation

The application was advertised in the West Australian on Monday 29 May 2017 no submissions were received by the closure date. The City of Cockburn was also invited to comment in a letter dated 29 May 2017.

6. Location and siting

6.1 Siting context

The proposed site is a factory unit within an area zoned for industrial use. The immediate surrounding premises are also factory units with various types of occupancy.

6.2 Residential and sensitive Premises

The distances to residential and sensitive receptors are detailed in Table 4.

Table 4: Receptors and distance from activity boundary

Sensitive Land Uses	Distance from Prescribed Activity
Residential Premises	650 Metres North in Phoenix Road, Bibra Lake
Adventure World Recreation Park No.5)	450 metres North East

6.3 Specified ecosystems

Specified ecosystems are areas of high conservation value and special significance that may be impacted as a result of activities at or Emissions and Discharges from the Premises. The distances to specified ecosystems are shown in Table 5. Table 5 also identifies the distances to other relevant ecosystem values which do not fit the definition of a specified ecosystem.

The table has also been modified to align with the *Guidance Statement: Environmental Siting*.

Table 5: Environmental values

Specified ecosystems	Distance from the Premises
Geomorphic Wetlands	A multiple use wetland (South Lake) is located 450 metres to the south west.
Parks and Wildlife Managed Lands and Waters	Beeliar Regional park to 220 metres to the south also classified as a Bush Forever site.
State Environment Policy Cockburn Sound Policy Boundary 2005	Premises is inside the State Environment Policy Cockburn Sound Policy Boundary 2005
Threatened Ecological Communities and Priority Ecological Communities	Priority protection for mammals and protected migratory birds are located within the Beeliar Regional park 220m south.

6.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 6.

Table 6: Groundwater and water sources

Groundwater and water sources	Distance from Premises	Environmental value
The nearest surface water body is South Lake in the Beeliar Regional Park.	540 metres	Recreation and conservation. No pathway for contamination from the premises.
Groundwater is marginally saline (500 to 1000 mg/L TDS)	The depth to water table is 30.5 metres.	Water is suitable for use for parks and garden irrigation with little iron stain risk.

6.5 Soil type

The DWER GIS layer describes the soil as undulating dune type with aeolianite at depth. Consists chiefly of brown sands and siliceous sands. The DOW Groundwater Atlas describes the surface geology as Tamala Limestone consisting of calcarenite and leached quartz sand.

7. Risk assessment

7.1 Determination of emission, pathway and receptor

In undertaking its risk assessment, DWER will identify all potential emissions pathways and potential receptors to establish whether there is a Risk Event which requires detailed risk assessment.

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. Where there is no actual or likely pathway and/or no receptor, the emission will be screened out and will not be considered as a Risk Event. In addition, where an emission has an actual or likely pathway and a receptor which may be adversely impacted, but that emission is regulated through other mechanisms such as Part IV of the EP Act, that emission will not be risk assessed further and will be screened out through Table 8.

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 7 and Table 8 below.

Table 7. Identification of emissions, pathway and receptors *during construction*

Risk Events					Continue to detailed risk assessment	Reasoning
Sources/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts		
Construction, mobilisation and positioning of infrastructure	Delivery and installation of equipment and building materials	Noise	<p>The nearest residential property is 540 metres away.</p> <p>Recreational areas (Beeliar Regional Park and Adventure World Recreational Park) are located 220m and 450m away</p> <p>Factory units are located immediately adjacent the premises.</p>	Air / wind dispersion	Amenity impacts	<p>No</p> <p>The Delegated Officer considers that the separation distance between the source and potential receptors is sufficient and the activity will occur in an industrial area.</p> <p>Adequately addressed by <i>Environmental Protection (Noise) Regulations 1997</i></p>

Table 8: Identification of emissions, pathway and receptors *during operation*

Risk Events					Continue to detailed risk assessment	Reasoning
Sources/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts		
Receipt, storage and handling of solvent and waste solvent	Transfer of solvents to and from tanker vehicle inside the building and Storage of solvent and waste solvent within existing shed	Odour	The nearest residential property is 650 metres away. Recreational areas(Beelieer Regional Park and Adventure World Recreational Park) are located 220m and 450m away Factory units are located immediately adjacent the premises.	Air / wind dispersion	Amenity impacts	Yes See 7.5
		Smoke and fume emissions in the event of a solvent fire.	The nearest residential property is 650 metres away. Recreational areas(Beelieer Regional Park and Adventure World Recreational Park) are located 220m and 450m away Factory units are located immediately adjacent the premises.	Air / wind dispersion	Health impacts from exposure to particulate matter in smoke such as eye, throat and chest irritation and increased risk of asthma attack	No The risk of fire is small due to surrounding industrial area and absence of combustible materials nearby(bush) and the size of any potential fire is limited by a restricting the storage of combustible liquids to 60 000 litres. The safe storage of combustible liquids is addressed under other legislation including the <i>Dangerous Goods Safety Act 2004</i> and associated regulations.

Risk Events					Continue to detailed risk assessment	Reasoning	
Sources/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts			
		<p>Spills of liquid solvent and waste solvent</p> <p>The nearest residential property is 650 metres away.</p> <p>Factory units are located immediately adjacent the premises.</p>	<p>Council stormwater drainage possibly connected to waterways and land</p> <p>Depth to groundwater is approximately 30.5 metres</p>	<p>Direct discharge to land.</p> <p>Discharge to land via stormwater</p>	<p>Contamination of land and water. Potential human exposure causing possible health effects such as skin and eye irritation in nearby factory units</p>	Yes	See 7.4
Distillation	Evaporation and condensation of solvent in hot water still- located within enclosed shed	Odour	<p>The nearest residential property is 650 metres away.</p> <p>Recreational areas(Beelieer Regional Park and Adventure World Recreational Park) are located 220m and 450m away</p> <p>Factory units are located immediately adjacent the premises.</p>	Air / wind dispersion	Reduction in amenity	Yes	See 7.5

Risk Events					Continue to detailed risk assessment	Reasoning
Sources/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts		
<p>Solid and liquid waste</p> <p>Liquid oily waste from still- located within bunded area inside enclosed shed</p> <p>Solid residue containing hydrocarbons and metals from still located in enclosed shed</p>	<p>Spills of liquid oily waste or other hazardous materials</p>	<p>Depth to groundwater is approximately 30.5 metres</p> <p>Council stormwater drainage connected to aquatic ecosystems and land.</p> <p>Localised contamination</p>	<p>Direct discharge to land.</p> <p>Discharge to land via stormwater</p>	<p>Contamination of land affecting current and future activities on site or requiring clean up to meet prescribed standards.</p>	<p>Yes</p>	<p>See 7.4</p>

7.2 Consequence and likelihood of risk events

A risk rating will be determined for risk events in accordance with the risk rating matrix set out in Table 9 below.

Table 9: Risk rating matrix

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High

DWER will undertake an assessment of the consequence and likelihood of the Risk Event in accordance with Table 10 below.

Table 10: Risk criteria table

Likelihood		Consequence		
The following criteria has been used to determine the likelihood of the Risk Event occurring.		The following criteria has been used to determine the consequences of a Risk Event occurring:		
			Environment	Public health* and amenity (such as air and water quality, noise, and odour)
Almost Certain	The risk event is expected to occur in most circumstances	Severe	<ul style="list-style-type: none"> onsite impacts: catastrophic offsite impacts local scale: high level or above offsite impacts wider scale: mid-level or above Mid to long-term or permanent impact to an area of high conservation value or special significance[^] Specific Consequence Criteria (for environment) are significantly exceeded 	<ul style="list-style-type: none"> Loss of life Adverse health effects: high level or ongoing medical treatment Specific Consequence Criteria (for public health) are significantly exceeded Local scale impacts: permanent loss of amenity
Likely	The risk event will probably occur in most circumstances	Major	<ul style="list-style-type: none"> onsite impacts: high level offsite impacts local scale: mid-level offsite impacts wider scale: low level Short-term impact to an area of high conservation value or special significance[^] Specific Consequence Criteria (for environment) are exceeded 	<ul style="list-style-type: none"> Adverse health effects: mid-level or frequent medical treatment Specific Consequence Criteria (for public health) are exceeded Local scale impacts: high level impact to amenity
Possible	The risk event could occur at some time	Moderate	<ul style="list-style-type: none"> onsite impacts: mid-level offsite impacts local scale: low level offsite impacts wider scale: minimal Specific Consequence Criteria (for environment) are at risk of not being met 	<ul style="list-style-type: none"> Adverse health effects: low level or occasional medical treatment Specific Consequence Criteria (for public health) are at risk of not being met Local scale impacts: mid-level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	<ul style="list-style-type: none"> onsite impacts: low level offsite impacts local scale: minimal offsite impacts wider scale: not detectable Specific Consequence Criteria (for environment) likely to be met 	<ul style="list-style-type: none"> Specific Consequence Criteria (for public health) are likely to be met Local scale impacts: low level impact to amenity
Rare	The risk event may only occur in exceptional circumstances	Slight	<ul style="list-style-type: none"> onsite impact: minimal Specific Consequence Criteria (for environment) met 	<ul style="list-style-type: none"> Local scale: minimal to amenity Specific Consequence Criteria (for public health) met

[^] Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting*.

* In applying public health criteria, DWER may have regard to the Department of Health's *Health Risk Assessment (Scoping) Guidelines*.

"onsite" means within the Prescribed Premises boundary.

7.3 Acceptability and treatment of Risk Event

DWER will determine the acceptability and treatment of Risk Events in accordance with the Risk treatment Table 11 below:

Table 11: Risk treatment table

Rating of Risk Event	Acceptability	Treatment
Extreme	Unacceptable.	Risk Event will not be tolerated. DWER may refuse application.
High	May be acceptable. Subject to multiple regulatory controls.	Risk Event may be tolerated and may be subject to multiple regulatory controls. This may include both outcome-based and management conditions.
Medium	Acceptable, generally subject to regulatory controls.	Risk Event is tolerable and is likely to be subject to some regulatory controls. A preference for outcome-based conditions where practical and appropriate will be applied.
Low	Acceptable, generally not controlled.	Risk Event is acceptable and will generally not be subject to regulatory controls.

7.4 Risk Assessment – Leaks or spills of hazardous materials

7.4.1 Description of leaks or spills of hazardous materials (operation)

Kerosene will be stored in 1 kL IBCs Located within a bunded area within an enclosed shed. There is potential for leaks or spills from these containers with the potential for stormwater to become contaminated.

7.4.2 Description of potential adverse impact from the emission

The Material Safety Data Sheet (MSDS) describes narrow cut kerosene as toxic and that it may cause irreversible health effects if ingested and it is also eco-toxic in the aquatic environment with a risk of bio-accumulation. Kerosene rapidly degrades in soil.

7.4.3 Criteria for assessment

General provisions of the EP Act make it an offence to cause or allow pollution. Narrow cut kerosene and other hydrocarbons shall not be discharged to the environment as specified by the UDR.

7.4.4 Applicant/ controls

This assessment has reviewed the controls set out in Table 12 below.

Table 12: Applicant’s proposed controls for leaks or spills of hazardous materials

Site infrastructure	Description	Operation details	Reference to issued licence plan (Schedule 1 of Licence)
Controls for Leaks and Spills			
Storage and transfer of solvents within existing shed	Storage in sealed IBCs Maximum 60 000 litres of solvent and waste solvent to be stored on the premises	Clean up spills IBC’s stored in secondary containment area	Schedule 1 Site Plan of licence
	Transfer via hoses and diaphragm pump system	Cease transfer if leak develops Transfer to occur within bunded area Clean up spills	
	A bund will be constructed around the distillation unit and associated IBCs. A bund will be constructed across the entrance to the shed	Bunds to be maintained.	

7.4.5 Key findings

The Delegated Officer has reviewed the information regarding the spills of hazardous liquids impacts from the premises and has found:

1. Applicant infrastructure and management controls are suitable to minimise the risk of spills occurring outside of a containment area.
2. The consequences of such a spill will be minor.

7.4.6 Consequence

If leaks and spills of hazardous materials occur, then the Delegated Officer has determined that the impact of contaminated land and water will be low level on-site effects with minimal impact on a local scale. Therefore, the Delegated Officer considers the consequence of leaks and spills to be **minor**.

7.4.7 Likelihood of Impact from Leaks and spills of Hazardous Materials

The Delegated Officer has determined that the likelihood of adverse impact from leaks and spills of hazardous materials occurring will probably not occur in most circumstances. Therefore, the Delegated Officer considers the likelihood of adverse effects from leaks and spills of hazardous materials to be **unlikely**.

7.4.8 Overall rating of leaks and spills of hazardous materials

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix (Table 9) and determined that the overall rating for the risk of leaks and spills from hazardous materials is **medium**.

7.5 Risk Assessment - Odour (Operation)

7.5.1 Description of Odour

Kerosene has a characteristic petroleum like odour which some people find offensive. The odour is likely to be stronger when the kerosene is heated.

7.5.2 Identification and general characterisation of emission

The clean solvent (narrow cut kerosene) has a characteristic odour which some people find offensive. Contaminants in the waste solvent may cause additional nuisance odours. The odour is likely to be stronger when the waste solvent is heated.

7.5.3 Description of potential adverse impacts form the emission

The odour could adversely affect the convenience, comfort or amenity at nearby businesses and residences.

7.5.4 Criteria for assessment

There are no set threshold or concentration criteria for odour assessment. The general provisions of the EP Act make it an offence to cause or allow unreasonable emissions which include emissions of odour that unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person. This standard is applicable to persons in nearby factory units and businesses as well as sensitive receptors.

7.5.5 Applicant controls

The Applicant's controls to reduce and manage odour emissions are set out in Table 13:

Table 13: Applicant controls for odour emissions

Control	Description
Siting	Located within the Bibra Lake industrial area immediately adjacent to other factory units. The nearest dwellings are 650 metres or more away.
Infrastructure	All storage and handling of kerosene is to be conducted inside an enclosed building. Transfer of potentially odorous material is accomplished by diaphragm pump. The distillation unit will be sealed.
Management	Not more than 60 000 litres of solvent and waste solvent to be held on the premises On-site spill kits available for the immediate clean up and removal of spills

7.5.6 Key findings

The Delegated Officer has reviewed the information regarding the odour impacts from the premises and has found:

1. Kerosene is only mildly odorous when stored at ambient temperatures
2. Steam distillation ensures that the kerosene is handled at temperatures not likely to cause emissions of strong odour.

3. Applicant infrastructure and management controls are suitable to minimise the risk of odour emissions and may be conditioned as regulatory controls in the licence subject to the risk assessment outcomes.

7.5.7 Consequence

The Delegated Officer has had regard to the scale, operational controls and proximity of receptors and has determined that the impact of will be low level offsite impacts at a local scale. Therefore, the Delegated Officer considers the consequence to be **minor**.

7.5.8 Likelihood of consequence

Based upon the equipment used and the nature and scale of the potentially odorous activities the Delegated Officer has determined that the likelihood of odour impacts off-site will probably not occur in most circumstances. Therefore, the Delegated Officer considers the consequence to be **unlikely**.

7.5.9 Overall rating

The Delegated Officer has compared the consequence and likelihood ratings described above for the Risk Criteria and determined that the overall rating for the risk of offsite odour impacts on sensitive receptors during operation is **medium**

7.6 Summary of acceptability and treatment of Risk Events

A summary of the risk assessment and the acceptability or unacceptability of the risk events set out above, with the appropriate treatment and control, are set out in Table 14 below. Controls are described further in section 11.

Table 14: Risk rating of emissions

	Emission		Pathway and Receptor (Impact)	Applicant controls	Risk Rating	Acceptability with treatment (conditions on instrument)
	Type	Source				
1.	Hazardous materials leaks and spills	Storage of up to 60 000 litres of solvent and waste solvent. Transfer of solvent and waste solvent in IBCs to and from the distillation unit Distillation of Solvent	Discharge directly to land or directed stormwater to land causing soil or water contamination	Infrastructure including concrete hardstand, bunding of shed and secondary containment.	Minor consequence Unlikely Medium Risk	Acceptable subject to Applicant controls - conditioned
2.	Odour	Storage of up to 60 000 litres of solvent and waste solvent. Transfer of solvent and waste solvent in IBCs to and	Air / wind to sensitive receptors casing amenity impacts	Infrastructure (sealed containers, tanks and pipework). Temperature control.	Minor consequence Unlikely	Acceptable subject to Applicant controls - conditioned

	Emission		Pathway and Receptor (Impact)	Applicant controls	Risk Rating	Acceptability with treatment (conditions on instrument)
	Type	Source				
		from the distillation unit Distillation of Solvent			Medium Risk	

8. Regulatory controls

A summary of regulatory controls determined to be appropriate for the Risk Event is set out in Table 15. The risks are set out in the assessment in section 7 and the controls are detailed in this section. DWER will determine controls having regard to the adequacy of controls proposed by the Applicant. The conditions of the works approval and licence will be set to give effect to the determined regulatory controls.

Controls will form the basis of conditions in the works approval set out in Attachment 1.

Table 15: Summary of regulatory controls to be applied in works approval and licence

		9.1 Specified Infrastructure and Equipment (construction)	Specified Action (Operation)
Risk Items (see risk analysis in section 7)	1.Spills of hazardous liquids	•	•
	2.Odours	•	•

8.1 Works Approval controls

8.1.1 Spill infrastructure and equipment

The following environmental controls, infrastructure and equipment should be installed and maintained onsite for spill management:

Infrastructure	Requirements (Design and Construction)
Bund or bunds to contain spills and leaks from IBCs and distillation equipment on site.	Constructed in accordance with section 4.4.3 of <i>AS1940-2004 The storage and handling of flammable and combustible liquids.</i>

Infrastructure	Requirements (Design and Construction)
Existing shed	Shed is enclosed with impervious concrete floor Bund to be constructed at entrance to prevent spills leaving the shed All storage and processing to occur in shed

8.1.2 Odour control infrastructure and Equipment

The following environmental controls, infrastructure and equipment should be installed and maintained onsite for odour management:

Infrastructure	Requirements
Diaphragm system for transfer of liquids to and from the distillation unit.	Seals to be maintained. Hoses and fittings checked and replaced when required.
Temperature controls on distillation unit.	Temperature controls to prevent overheating of kerosene and consequent release of vapour.
Existing shed	Shed is enclosed and all storage and handling of solvents to take place inside the shed

8.2 Licence controls

8.2.1 Specified actions

The following actions should be undertaken for the management of emissions of odour (fugitive) emissions in the licence.

- Ensure that all seals and temperature control are maintained on the distillation unit.
- Ensure that, if during the distillation of solvents, vapours are emitted by the distillation unit, the following actions are taken:
 - cease the heating of solvent,
 - cease the loading of solvent into the distillation unit

Until the cause of the vapour emission has been rectified.

9. Determination of Works Approval and Licence conditions

The conditions in the issued Works Approval and Licence in Attachment 1 have been determined in accordance with DWER's *Guidance Statement: Setting Conditions*.

DWER's Guidance Statement: Licence Duration has been applied and the issued works approval expires in 3 years from date of issue. The Licence, when issued expires in 20 years from date of issue

Table 16 provides a summary of the conditions to be applied to this works approval and licence.

Table 16: Summary of conditions to be applied

Condition Ref	Grounds
Works approval Controls	
Environmental Compliance Condition 1	Environmental compliance is a valid, risk-based condition to ensure appropriate linkage between the licence and the EP Act.
Notification of Material Change 2	This condition is valid, risk-based and enables flexibility in operations.
Infrastructure and Equipment 3 and 4	These conditions are valid, risk-based and contain appropriate controls (see section 8).
Emissions 5	This condition is valid, risk-based and consistent with the EP Act.
Information 6, 7, 8 and 9	These conditions are valid and are necessary administration and reporting requirements to ensure compliance.
Licence Controls	
Specified Actions Conditions 1, 2 and 3	These conditions are valid, risk-based and contain appropriate controls (see section 8).
Emissions- Condition 4	This condition is valid, risk-based and consistent with the EP Act.
Infrastructure and Equipment – Condition 5	This condition is valid, risk-based and contains appropriate controls (see section 8).
Notification of Material Change – conditions 6, 7 and 8	These conditions are valid, risk-based and enable flexibility in operations.
Information – Conditions 9, 10, 11, 12 and 13	These conditions are valid and are necessary administration and reporting requirements to ensure compliance.

DWER notes that it may review the appropriateness and adequacy of controls at any time and that, following a review, DWER may initiate amendments to the licence and works approval under the EP Act.

10. Applicant's comments

The Applicant was provided with the draft Decision Report and draft Works Approval and licence on 22 June 2017. The Applicant provided comments which are summarised, along with DWER's response, in Appendix 2.

11. Works Approval compliance

The applicant submitted a compliance report confirming construction in accordance with the Works Approval 28 July 2017 and a DWER officer inspected the facility on 1 August 2017 and confirmed the construction of the bunding and installation of the still.

12. Conclusion

This assessment of the risks of activities on the Premises has been undertaken with due This assessment of the risks of activities on the premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this decision report (summarised in Appendix 1).

The Licence will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Caron Goodbourn
A/MANAGER LICENSING (PROCESS INDUSTRIES)
LICENSING AND APPROVALS
Delegated Officer
under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key documents

	Document title	In text ref	Availability
1.	Enviroclean (WA) Pty Ltd application for works approval and licence	application	DWER records (A1431827)
2.	Works Approval W6053/2017/1	Issued Works Approval	accessed at www.dwer.wa.gov.au
3.	Licence L9057/2017/1	Licence	
4.	July 2015. <i>Guidance Statement: Regulatory principles.</i> Department of Environment Regulation, Perth.	DER 2015a	
5.	October 2015. <i>Guidance Statement: Setting conditions.</i> Department of Environment Regulation, Perth.	DER 2015b	accessed at www.dwer.wa.gov.au
6.	August 2016. <i>Guidance Statement: Licence duration.</i> Department of Environment Regulation, Perth.	DER 2016a	
7.	November 2016. <i>Guidance Statement: Risk Assessments.</i> Department of Environment Regulation, Perth.	DER 2016b	
8.	November 2016. <i>Guidance Statement: Decision Making.</i> Department of Environment Regulation, Perth.	DER 2016c	
9.	Guidance Statement: Publication of Annual Audit Compliance Reports, May 2016		

Appendix 2: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder comment	DWER response
Draft Decision Document, Works Approval and Licence	The applicant expressed concerned that the use of multiple terms like solvent, kerosene and degreaser created ambiguity throughout the document but particularly with regard to what quantities of solvent and waste solvent that are permitted to be stored.	The documents have been changed so that the terms "solvent" and "waste solvent" have been included in the list of definitions in each document and this terminology is now used throughout.
Draft Decision Document, Works Approval and Licence	The maximum quantity of solvent it inconsistently stated in the documents.	Clarifying information supplied by the applicant specifies a maximum storage of 15kL of solvent and 45kL of waste solvent. The documents have been changed to clearly show that there is a 60kL maximum storage of the total of solvent and waste solvent.