



Manager
Tilling Timber Pty Ltd
31-45 Orchard Street
KILSYTH VIC 3137

Dear Sir/Madam

ENVIRONMENTAL PROTECTION ACT 1986: LICENCE GRANTED

Premises

Tilling Timber Pty Ltd
Lot 301 on Plan 63655, 10 Cartwright Drive, FORRESTDALE WA 6058
Licence Number: L8615/2011/1

A licence under the *Environmental Protection act 1986* (the Act) has been granted for the above premises. The Department of Environment and Conservation will advertise the issuing of this licence in the public notices section of *The West Australian* newspaper.

The licence includes attached conditions. Under Section 58(1) of the Act, it is an offence to contravene a condition of a licence. This offence carries a penalty of up to \$125,000 and a daily penalty of up to \$25,000

In accordance with section 102(1)(c) of the Act, you have 21 days to appeal the conditions of the licence. Under section 102(3)(a) of the Act, any other person may also appeal the conditions of the licence. To lodge an appeal, contact the Office of the Appeals Convenor on 6467 5190 or by email at admin@appealsconvenor.wa.gov.au.

Where a licence is issued for more than one year it requires payment of an annual fee and will cease to have effect if the fee is unpaid. It is the occupier's responsibility to lodge a fee application and pay the annual fee in sufficient time to avoid incurring a late payment fee and for processing to be completed before the licence anniversary date.

If you have any queries regarding the above information, please contact Jessica French on 9333 7524.

Yours sincerely

Officer delegated under Section 20
of the *Environmental Protection Act 1986*

Monday, 19 March 2012

enc: *Environmental Protection Act 1986* Works Approval L8615/2011/1

DIRECTOR GENERAL AND ENVIRONMENTAL SERVICES DIVISIONS: The Atrium, 168 St Georges Terrace, Perth, Western Australia 6000
Phone: (08) 6467 5000 Fax: (08) 6467 5562

PARKS AND CONSERVATION SERVICES DIVISIONS: Executive: Corner of Australia II Drive and Hackett Drive, Crawley, Western Australia 6009
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www.dec.wa.gov.au
wa.gov.au



Licence

Environmental Protection Act 1986, Part V

Licensee: Tilling Timber Pty Ltd

Licence: L8615/2011/1

Registered Office: 31-45 Orchard St
Kilsyth
VIC 3137


ACN: 004 621 121

Premises Address: Lot 301 on Plan 63655, 10 Cartwright Drive
Forrestdale
WA 6058

Licence Period: 5 years

Commencement Date: Monday 19/3/2012

Expiry Date: Saturday 18/3/2017



Officer delegated under Section 20
of the *Environmental Protection Act 1986*

Issue Date: Monday 19/3/2012



Contents

Licence	i
Contents	ii
Introduction	ii
Licence Conditions	1
1 General	1
2 Emissions	3
3 Monitoring	3
4 Improvements	3
5 Information	3
Schedule 2: Reporting & Notification Forms	6

Introduction

This Introduction is not part of the Licence conditions.

Premises Description and Licence Summary

Tilling Timber Pty Ltd (Tilling Timber) currently operates a timber import, wholesale and distribution business from its premises at Lot 301 Cartwright Drive, Forrestdale, WA. Tilling Timber proposes to include timber treatment in its scope of activities undertaken on-site.

Timber is being treated to Australian Standards AS1604.1-2010 - Hazard Level 2, being a 2mm envelope treatment.

The key issue for the premises is containment. It is anticipated that there will be no discharges or emissions from the premises if the activities are managed in accordance with the sites Environmental Management Plan.

This site is within the:

- Surface water management area of the Canning River;
- Proclaimed groundwater area under the Rights in Water Irrigation Act 1914;
- Medium to low risk area for acid sulfate soil; and
- Waugal Wiskers Aboriginal mythological site and artefacts are located 430 m south-west.

This Licence is for the operation of a new facility established under works approval W4959/2011/1.

This Licence is issued under the *Environmental Protection Act 1986* as the following categories from the Environmental Protection Regulations 1987 cause this Premises to be a prescribed premises for the purposes of the Act:

Categories Log		
Category number	Description of category	Premises assessment capacity
29	Timber preserving: premises on which timber is preserved for commercial purposes by the use of chemicals.	40 000m ³ per year

The licences and works approvals issued for the Premises since 07/07/2011 are:

Instrument Log		
Instrument	Issued	Description



W4959/2011/1	7 July 2011	Works Approval
L8615/2011/1	19 March 2012	Licence

Severance

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

END OF INTRODUCTION



Licence Conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the Act apply unless the contrary intention appears.

1.1.2 In the Licence, unless the contrary intention appears:

“the Act” means the *Environmental Protection Act 1986*;

“annual” means the period from 1 April until 31 March in the following year;

“Code of Practice for the Storage and handling of dangerous goods” means the Storage and handling of dangerous goods, Code of Practice, Dept of Mines and Petroleum, Government of Western Australia;

“contact address” for the purpose of correspondence and advice means:

Team Leader, Swan Region
Department of Environment and Conservation
Locked Bag 104
BENTLEY WA 6983

Telephone: (08) 9333 7510
Facsimile: (08) 9333 7550

“dangerous goods” has the meaning defined in the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007;

“Director” means Director, Environmental Regulation Division of the Department of Environment and Conservation for and on behalf of the Chief Executive Officer as delegated under Section 20 of the *Environmental Protection Act 1986*;

“environmentally hazardous material” means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm;

“fugitive emissions” means all emissions not arising from point sources;

“Licence” means this Licence numbered **L8615/2011/1** and issued under the *Environmental Protection Act 1986*;

“Licensee” means the person or organisation named as Licensee on page i of the Licence;

“placard quantity” has the meaning defined in the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007;

“Premises” is as defined by Condition 1:2.3 of the Licence;



“waste” has the meaning defined in the Environmental Protection Act 1986;

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

1.2 General conditions

1.2.1 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:

- (a) pollution;
- (b) unreasonable emission;
- (c) discharge of waste in circumstances likely to cause pollution; or
- (d) being contrary to any written law.

1.2.2 The Licensee shall provide to the Director prior written notice of any works it intends to undertake on the Premises that may:

- (a) cause any emission;
- (b) alter the volume, nature, location or source of any emission;
- (c) alter the method of detecting, monitoring or measuring any emission; or
- (d) involve the installation, alteration or replacement of any emission causing process equipment or industrial plant.

1.2.3 The Premises is the area defined in Table 1.2.1 and depicted visually in the Premises Map in Schedule 1.

Table 1.2.1: Premises location & description

Location	Premises definition	All or part	Record of cadastral definition
Cartwright Drive, Forrestdale	Lot 301 on Plan 63655	All	Plan 63655

1.2.4 The Licensee shall maintain all pollution control and monitoring equipment to the manufacturer's specification and any internal management system.

1.2.5 The Licensee, except where storage is prescribed in section 1.3, shall only store more than 250 kg or 250 litres of any substance that is classed as dangerous goods below placard quantities or environmentally hazardous materials not classified as dangerous goods if:

- (a) they are stored in accordance with the Code of Practice for the Storage and handling of dangerous goods; and
- (b) if secondary containment is required by 1.2.5(a) it is constructed and maintained to:
 - (i) contain not less than 110% of the volume of the largest storage vessel or inter-connected system; and
 - (ii) contain at least 25% of the total volume of vessels stored in the compound; and
 - (iii) have a low permeability (10^{-9} m/s or less).

1.2.6 The Licensee shall immediately recover, or remove and dispose of spills or leaks of environmentally hazardous materials outside its storage vessel.

1.2.7 The Licensee shall direct stormwater away from the timber treatment and storage area into dedicated stormwater drains.



- 1.2.8 The Licensee shall ensure stormwater drains on the premises are kept clear of waste to allow for their effective use.

1.3 Premises operation

DRIPPING AREA

- 1.3.1 The Licensee shall allow sufficient dripping time of treated timber to prevent spills and drips on the factory floor.

2 Emissions

2.1 General

- 2.1.1 The Licensee shall record and investigate the exceedance of any limit, and/or target in this section.

2.2-2.5 Emissions to air, surface waters, land and groundwater

There are no specified conditions relating to emissions to air, surface water, land or groundwater in these sections.

2.6 Fugitive emissions

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

2.7 Odour

- 2.7.1 The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.

3 Monitoring

There are no specified conditions relating to monitoring in this section.

4 Improvements

There are no specified improvement conditions in this section.

5 Information

5.1 Records

- 5.1.1 All information and records required by the Licence shall:
(a) be legible;



- (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- (c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- (d) for those following records, be retained until the expiry of the Licence or any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or groundwater.

5.1.2 The Licensee shall ensure that:

- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
- (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.

5.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous year.

5.1.4 The Licence shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

5.2 Reporting

5.2.1 The Licensee shall submit to the Director at the Contact Address an annual environmental report within 28 calendar days after of the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.

Table 5.2.1: Annual environmental report		
Condition or Table (if relevant)	Parameter	Format or Form ¹
5.1.3	Compliance	AACR
5.1.4	Summary of complaints	None specified

Note 1: Forms are in Schedule 2

5.3 Notification

5.3.1 Parameters listed in Table 5.3.1 shall be notified to the Director at the Contact Address and in accordance with the notification requirements of the table.

Table 5.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement ¹	Format or form ²
-	Any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution	Part A: As soon as practicable but no later than 5PM of the next usual working day. Part B: As soon as practicable	N1
2.1.1	Breach of limit		

Note 1: No notification requirement in the Licence shall negate the requirement to comply with s72 of the Act.

Note 2: Forms are in Schedule 2



Schedule 1: Maps

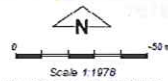
Premises Map

The Premises is shown in the map below. The pink line defines the Premises boundary but it is also listed in 1.2.3. The definition in the map should prevail if any discrepancy exists.]



LEGEND

- Local Government Authorities
- Road Centrelines
- Perth Metropolitan Area
- Central 20km Orthometric - Legend 2007
- Swan River Trust Act.
- Swan River Trust Management Area



Geocentric Datum Australia 1994
Note: the data in this map have not been projected. This may result in geometric distortion or measurement inaccuracies.

Prepared by: jcs/edf
Prepared for:
Date: 23/09/2011 10:01:18 AM

Information derived from this map should be confirmed with the data institutions acknowledged by the agency acronym in the legend.



Schedule 2: Reporting & Notification Forms

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

The original monitoring reports must also be submitted.

Licence: L8615/2011/1 Licensee: Tilling Timber Pty Ltd
Form: AACR Period : yyyy
Name: Annual Audit Compliance Report

Annual Audit Compliance Report

Section A: Statement of compliance with Licence conditions

Were all conditions of licence complied with within the reporting period?		
Yes	<input type="checkbox"/>	Initial Sections A & B, then proceed to Section C
No	<input type="checkbox"/>	Initial Section A, then proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this annual audit compliance report (AACR).

Initial:



Section B: Details of non-compliance with Licence condition

a) Licence condition not complied with?	
b) Date(s) and time(s) the non compliance occurred, if applicable?	
c) Was this non compliance reported to DEC?	
<input type="checkbox"/> Yes, and <input type="checkbox"/> Reported to DEC verbally Date <input type="checkbox"/> Reported to DEC in writing Date	<input type="checkbox"/> No
d) Has DEC taken, or finalised any action in relation to the non compliance?	
e) Summary of particulars of non compliance, and what was the environmental impact?	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram)	
g) Cause of non compliance	
h) Action taken or that will be taken to mitigate any adverse effects of the non compliance	
i) Action taken or that will be taken to prevent recurrence of the non compliance	

Please use a separate page for each Licence condition that was not complied with. Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



Section C: Signature and certification

This AACR may only be signed by a person(s) with legal authority to sign it as defined below. Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the Licence holder is		The AACR must be signed and certified:
an individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual Licence holder, or by a person approved in writing by the Chief Executive Officer (CEO) of DEC to sign on the Licensee's behalf.
a corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the Licensee in accordance with the Corporations Act 2001; or by two directors of the Licensee; or by a director and a company secretary of the Licensee, or if the Licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the Licensee; or by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DEC.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the Licensee; or by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DEC.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the CEO of the Licensee; or by affixing the seal of the local government.

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

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

Signature:

Signature:

Name: (printed)

Name: (printed)

Position:

Position:

Date:

Date:

Seal (if signing under seal)



Licence: **L8615/2011/1**
Form: **N1**

Licensee: **Tilling Timber Pty Ltd**
Date of breach: **dd/mm/yyyy**

Notification of detection of the breach of a limit or any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution.

These pages outline the information that the operator must provide.
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	L8615/2011/1
Name of operator	Tilling Timber Pty Ltd
Location of Premises	Lot 301 Cartwright Drive, Forrestdale
Time and date of the detection	

Notification requirements for the breach of a limit	
To be notified as soon as practicable and no later than 5PM of the next working day	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

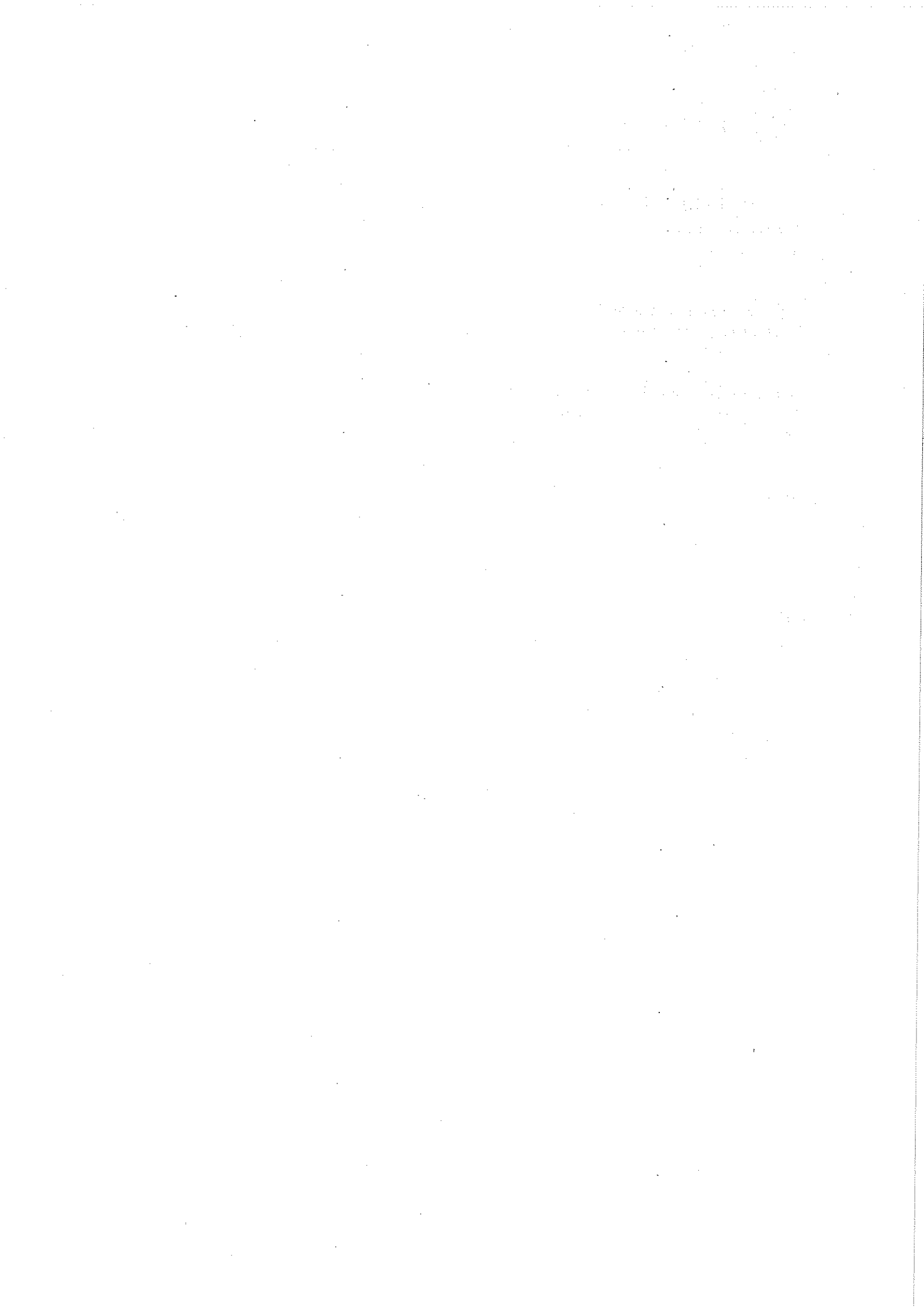
Notification requirements for any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution	
To be notified as soon as practicable and no later than 5PM of the next working day	
Date and time of event	
Reference or description of the location of the event	
Description of where any release into the environment took place.	
Substances potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident	



Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the installation in the preceding 24 months.	

Name*	
Post	
Signature on behalf of Tilling Timber Pty Ltd	
Date	





LICENCE NUMBER: L8615/2011/1
LICENCE FILE NUMBER: 2011/010257-1
APPLICATION DATE: 2 November 2011
EXPIRY DATE: 28 February 2017

PREMISES DETAILS

LICENSEE

Tilling Timber Pty Ltd
31-45 Orchard St
KILSYTH VIC 3137
ACN: 004 621 121

PREMISES

Tilling Timber (WA)
Lot 301 on Plan 63655, 10 Cartwright Drive
FORRESTDALE WA 6112

PRESCRIBED PREMISES SUMMARY

Table 1: Prescribed premises summary

Category number*	Category Description*	Category Production or Design Capacity*	Premises Production or Design Capacity#	Premises Fee Component**
29	Timber preserving: premises on which timber is preserved for commercial purposes by use of chemicals.	Not applicable	40 000 m ³ per year	5,000 - 50,000 tonnes per year

* From Schedule 1 of the Environmental Protection Regulations 1987

From application

** From Schedule 4 of the Environmental Protection Regulations 1987

This Environmental Assessment Report (EAR) has been drafted for the purposes of detailing information on the management and mitigation of emissions and discharges from the prescribed premises. The objective of the EAR is to provide a risk assessment of emissions and discharges, and information on the management of other activities occurring onsite which are not related to the control of emissions and discharges from the prescribed premises activity. This does not restrict the Department of Environment and Conservation (DEC) to assessing only those emissions and discharges generated from the activities that cause the premises to become prescribed premises.

Basis of Assessment

Tilling Timber has been assessed as a "prescribed premises" under category number 29, within Schedule 1 of the *Environmental Protection Regulations 1987*.

The proposal is to treat timber with a preservative known as Tanalith Ti, a waterborne solution of Imidacloprid (IM30) at approximately 4.0% v/v with the addition of a pigment pack at approximately 0.6% v/v. The treated timber will be identified by its blue colour and marked as H2F in-line with industry practice for treated timber.

It is proposed that the maximum production of preservative treated timber is 40,000m³ per annum.



This volume will be reached over time with initial volumes being as low as 5,000m³ per annum. The warehouse area required to operate the equipment, accommodate the flow of timber in and out of the work area and of that required to store the timber prior to being relocated to the wrapping station is approximately 250 m².

1.0 BACKGROUND

1.1 GENERAL COMPANY DESCRIPTION

Tilling Timber Pty Ltd (Tilling Timber) currently operates a timber import, wholesale and distribution business from its premises at Lot 301 Cartwright Dr, Forestdale, WA. Tilling Timber proposes to include timber treatment in its scope of activities undertaken on-site.

In 2002, European House Borer was discovered in a property at Mahogany Creek, east of Perth and subsequently in pine plantations in adjacent areas and further afield in plantations on the Perth region coastal plain. European House Borer is a destructive pest that targets softwood and is on the Federal Department of Agriculture noxious pests list. The Western Australian Department of Agriculture has set up zones around Metropolitan Perth to limit the movement of untreated softwood. The Department of Agriculture has also advertised and educated local communities and industries of the dangers of not containing this pest. This has increased the demand for suitably treated timber products from the house building market of WA.

Timber is being treated to Australian Standards AS1604.1-2010 - Hazard Level 2, being a 2mm envelope treatment.

Tilling Timber has prepared an Environmental Management Program as part of its application for Works Approval. The plant and warehouse design have been addressed to ensure there are no adverse environmental impacts from normal and/or abnormal operating conditions. A maintenance schedule has been developed to ensure plant is in good working order and emergency response procedures are included in the company's staff training to ensure staff is aware of standard procedures in the event of an emergency or incident.

1.2 LOCATION OF PREMISES

The premises is located at 10 (Lot 301) Cartwright Drive FORRESTDALE WA 6112, as depicted in **Attachment 1**. This site is within the:

- Surface water management area of the Canning River;
- Proclaimed groundwater area under the Rights in Water Irrigation Act 1914;
- Medium to low risk area for acid sulfate soil; and
- Waugal Wiskers Aboriginal mythological site and artefacts are located 430 m south-west.

Additionally, the closest sensitive premises is a residential dwelling 350 m north-east, a commercial property is located 30 metres from the premises and the Southern River is located approximately 620 metres to the east. The geology of the area is described as sandy dunes with intervening sandy and clayey swamp flats: chief soils are leached sands, alluvial and shoreline and eolian deposits.

1.3 PROCESS AND PROPOSAL DESCRIPTION

The proposal is to operate a timber treatment plant, which consists of a 30 000 litre inner dipping tank and an outer containment bund tank with a displaced volume of 33 000 litres which represents 110% of the volume of the working solution. Inner tank size is 30,000 however, allowing for timber displacement plus only requiring the timber to be submerged, the working solution volume is only 18,000ltrs therefore the bund capacity is 180% of working solution. Volumes in the working tank are set via PLC controlled dosing system including max level sensors.



Also included is pack lifting equipment, splash shields and controls to prevent liquid spillage when the frame is rotated to enhance solution penetration into the packets. Additionally, there will be bund containment for the IBC's of chemical concentrate and pigment pack.

The largest timber packet to be treated is approximately 5.7m³ with pack lengths ranging from 0.9m to 6.0m.

An automated dosing system will deliver Tanalith Ti concentrate and pigment from IBC/drums to ensure correct solution strengths and levels are maintained at all times. The dosing system platform holds two IBC's, has a self contained bund of 110%. The dosing platform and the tipping tank are with 600mm of one another. There is tubing running from the dosing platform to the tipping tank (see attaché photo). Tubing is fixed to a steel pipe, it is set to the rear of the dosing platform and is well away from traffic in the area.

Tilling also carry 2 addition IBC's which are stored on a dedicated 2xIBC bund.

The timber packs will be delivered to the dipping plant by fork truck. The timber packs are placed onto the dipping frame which is lowered into the working solution until the timber packs are completely submerged. The timber is held submerged for approximately 5 minutes to allow for the appropriate level of chemical penetration, then raised, moved back to its original position and held until it is drip free before being placed in a designated undercover storage area adjacent to the dipping plant. The timber is to be held in this area until the surface is dry when it can then be moved to an undercover area for plastic wrapping prior to dispatch.



The timber dipping plant is proposed to be a 'zero discharge' process. From the time the preservation chemicals are delivered to site and consumed in the dipping process. Timber is delivered to the dipping plant free of sawdust and other loose material. Timber is not



removed from the dipping plant until it is drip free. Timber is then not to be released from designated undercover storage area until the chemical fixation has occurred.

The proponent proposes to use several waste minimisation techniques to reduce the potential waste being generated.

Physical Measures

Physical discharge prevention measures include:

- sealed concrete slab removes the possibility of soil and groundwater contamination. Includes sealant to concrete joints in warehouse floor slab;
- separate bund for IBC's /drums;
- drip tray/splash shield collection to return any working solution to the dip bath;
- roofed warehouse eliminates the potential for contaminated storm water discharge;
- The area has been completely sealed, slab joints where cut and corked, so that in the unlikely event of a spill any liquid would not be able to leech through the slab or slab joints to the subsoil. There is a work procedure in place in the unlikely event of a spill, spill kits are located within the work area; and
- treated timber is wrapped in plastic prior to dispatch. Wrapped treated timber may be stored outside the warehouse from time to time.

Work Practices

Work practices that aim to prevent discharges to the environment include:

- periodic planned preventative maintenance on all equipment;
- manage the transfer of chemical from IBC's to dip bath by auto dosing equipment to maintain consistent level/work solution strength; and
- present clean timber to the plant to minimise contaminated waste.

Liquid Waste

During normal operation, it is expected that there will be no liquid waste produced from this process.

Solid Waste

Treatment procedures are of most benefit if the timber being treated is in its final shape and form for end use prior to treatment. Consequently all timber treated at the plant will have been re-sawn or docked to length prior to being treated. The only possible source of waste is sawdust, splinters and shavings adhering to this timber. As most timber arriving on site is in its final form, it is considered waste from these sources will be very low. This type of waste will accumulate in the bottom of the dipping tank and will be removed from the premises in sealed containers to an appropriately licensed facility when tank cleaning and maintenance is undertaken. Sawdust used to absorb minor spills will also be disposed of in a similar manner.

Used chemical containers will be cleaned and rinsed within the bunding platform. All liquid will be pumped into the working tank as part of the working solution. Tilling Timber has a contract with the chemical supplier that obligates the supplier to take possession of the empty chemical containers.

Vapours

The active ingredients in Imidacloprid and pigment pack are non volatile therefore there will be no generation of chemical vapour within the plant.



1.4 REGULATORY CONTEXT

1.4.1 Part V Environmental Protection Act 1986, Environmental Management

The proposal has been assessed under Category 29; Timber preserving within Schedule 1 of the Environmental Regulations 1987.

Other activities which are not prescribed occurring onsite include warehousing, sawing, docking and plastic wrapping of timber. Possible emissions and discharges from these activities are adequately regulated under the general provisions of the *Environmental Protection Act 1986* and the Environmental Protection Regulations 1987.

A works approval for the construction of the premises was issued by DEC on 7 July 2011 (W4959/2011/1). A compliance document was submitted by Tilling Timber on 24 October 2011.

1.4.2 Other Decision Making Authorities' Legislation which applies

- The Department of Mines and Petroleum is responsible for Dangerous Goods legislation. The active ingredient in the timber preserving agent, Imidacloprid has a Hazchem code 2Z, Dangerous Goods class 9 for transport and packing group III.
- The Department of Agriculture has set up zones around the Perth metropolitan area to limit the movement of untreated softwood in an attempt to eliminate the European House Borer.
- Department of Commerce WorkSafe are responsible for occupational health and safety.

1.4.3 Rights in Water Irrigation Act 1914

The property is located within a Proclaimed Groundwater Area under the *Rights in Water Irrigation Act 1914*. A Groundwater licence may be required for the abstraction of groundwater.

1.4.3 Local Government Authority

The City of Armadale is the Local Government Authority responsible for town planning issues.

2.0 STAKEHOLDER AND COMMUNITY CONSULTATION

SUBMISSIONS RECEIVED DURING 21 DAY PUBLIC COMMENT PERIOD

The Application for licence details for this facility was advertised in the West Australian newspaper on 12 December 2011 as a means of advising stakeholders and to seek public comments. No submissions were received.

3.0 EMISSIONS AND DISCHARGES RISK ASSESSMENT

DEC considers that conditions should focus on regulating emissions and discharges of significance. Where appropriate, emissions and discharges which are not significant should be managed and regulated by other legislative tools or management mechanisms.

The following section assesses the environmental risk of potential emissions from Tilling Timber. In order to determine the site's appropriate environmental regulation, an emissions and discharges risk assessment was conducted of Tilling Timber using the environmental risk matrix outlined in Appendix A. The results of this are summarised in Table 2.



Table 2: Risk assessment and regulatory response summary table.

Risk factor	Significance of emissions	Socio-Political Context of Each Regulated Emission	Risk Assessment	DEC Regulation (EP Act - Part V)	EAR Reference	Other management (legislation, tools, agencies)
Dust emissions	Operations: 2. Dust emissions from the sawing and storage of timber are expected to be low as timber will be sawn and stored in a fully enclosed warehouse and most timber arriving on-site will be in its final form.	Low. Dust has the potential to become a nuisance if it is not managed appropriately at the premises. Distance to sensitive premises (residential dwelling) is 350 m. EPA recommended buffer is 300-500m	D – Standard dust conditions on licence.	LIC – condition visible dust from escaping the premises boundary		Environmental Protection (Unauthorised Discharges) Regulations 2004
Odour emissions	Operations: 1. Imidacloprid has a weak characteristic odour not expected to be an issue of concern. Blue Pigment Pack has a slight acrylic odour and not expected to be an issue of concern.	Low. Odour is not expected to be an issue of concern due to the weak characteristics of the chemicals used.	E – General provisions of the <i>Environmental Protection Act 1986</i> in regards to unreasonable emissions	LIC– odour condition		Odour Methodology Guidelines, DEP, March 2002
Noise emissions	Operations: 2. Plant and low capacity hydraulic motors will be situated with the fully enclosed warehouse and are not expected to create nuisance levels of noise	Low. Noise is not expected to be an issue of concern and the Noise Regulations will be sufficient in regulating noise.	D – compliance with Environmental Protection (Noise) Regulations 1997	LIC– no conditions		Environmental Protection (Noise) Regulations 1997,
Solid / liquid wastes	Operations: 2. Empty drums will be rinsed in the bunded area and liquid will be pumped into the process tank. The chemical supplier has ownership of the drums and will organise disposal. Waste in the form of shavings, splinters and sawdust that accumulates at the bottom of the process tank will be removed as required. This material will be stored in sealed containers and removed by a licensed controlled waste carrier and disposed in an approved landfill. Spent spill kit materials will be treated in the same manner. Plastic wrapped treated wood may be stored outside the warehouse from time to time. Tanalith Ti is considered a pesticide and is listed as a material that must not be discharged into the environment under Schedule 1 of the Environmental Protection (Unauthorised Discharges) Regulations 2004.	Low. Solid/liquid wastes may become an issue of concern if not managed appropriately. Spills, sludges and empty chemical containers may cause site contamination if allowed to enter the environment. Unwrapped treated wood may leach pesticides into the environment if stored outside the warehouse.	D – Condition the removal of spent chemicals and empty chemical containers	LIC – condition storage of spent chemicals and empty chemical containers.		Environmental Protection (Controlled Waste) Regulations 2004, Environmental Protection (Unauthorised Discharges) Regulations 2004



Risk factor	Significance of emissions	Socio-Political Context of Each Regulated Emission	Risk Assessment	DEC Regulation (EP Act - Part V)	EAR Reference	Other management (legislation, tools, agencies)
Hydrocarbon/ chemical storage	Operations: 2. All chemicals will be stored within a bund. The 30 000 litre dipping tank will have an outer containment bund designed to hold 33 000 litres which represents 110% of the capacity of the vessel and 180% of the volume of solution. The IBC's and drums of Imidacloprid and pigment pack will be contained in a separate bund. All environmentally hazardous materials will be stored in accordance with AS 1940.	Low. Hydrocarbon/ chemical storage may become an issue of concern if contents of tanks spill. Secondary containment is required to be maintained to ensure chemicals do not enter the environment in case of a spill.	D – Condition the secondary containment of environmentally hazardous substances	LIC – condition storage and containment/bunding of environmentally hazardous substances.		Dangerous Goods storage licence and relevant legislation (DMP)

4.0 GENERAL SUMMARY AND COMMENTS

Tilling Timber is considered a low risk timber preserving premises. A 5 year licence will be issued to Tilling Timber Proprietary Limited.

The EPA recommended buffer for a timber preserving premises is 300 – 500 metres depending on size. This timber preserving premises is relatively small with one 30 000 litre process tank and an annual production capacity of 20 000m³. The closest sensitive receptor is a residential property approximately 350 metres from the premises.

It is anticipated that activities at this premises will not create any noise, dust or odour issues. Noise can be regulated under the Environmental Protection (Noise) Regulations 1997 however not anticipated to be an issue of significance as plant will be situated within an enclosed warehouse. Dust will be regulated with standard dust licence conditions, however dust is not anticipated to be an emission of significance as all activities will be undertaken in an enclosed warehouse. Odour will be minimal due to the weak characteristics of the chemicals used, therefore the general provisions of the *Environmental Protection Act 1986* are sufficient for unreasonable emissions of odour.

The activities undertaken on-site will be conducted within an enclosed warehouse with hardstand concrete flooring. Treated timber will be wrapped in plastic and may be stored outside of the warehouse from time to time. Tanalith Ti is considered a pesticide. Pesticides are listed in Schedule 1 of the Environmental Protection (Unauthorised Discharges) Regulations 2004 as a material that must not be discharged into the environment.

All chemicals will be sufficiently contained. The 30 000 litre treatment tank will have an outer containment bund of 33 000 litre capacity which meets the requirements under the Dangerous Goods legislation. The IBCs and other chemical containers will be stored in a separate bund.



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APPENDIX A: EMISSIONS AND DISCHARGES RISK ASSESSMENT MATRIX

Table 3: Measures of Significance of Emissions

Emissions as a percentage of the relevant emission or ambient standard		Worst Case Operating Conditions (95 th Percentile)			
		>100%	50 – 100%	20 – 50%	<20%*
Normal Operating Conditions (50 th Percentil	>100%	5	N/A	N/A	N/A
	50 – 100%	4	3	N/A	N/A
	20 – 50%	4	3	2	N/A
	<20%*	3	3	2	1

*For reliable technology, this figure could increase to 30%

Table 4: Socio-Political Context of Each Regulated Emission

		Relative proximity of the interested party with regards to the emission				
		Immediately Adjacent	Adjacent	Nearby	Distant	Isolated
Level of Community Interest or Concern*	5	High	High	Medium High	Medium	Low
	4	High	High	Medium High	Medium	Low
	3	Medium High	Medium High	Medium	Low	No
	2	Low	Low	Low	Low	No
	1	No	No	No	No	No

Note: These examples are not exclusive and professional judgement is needed to evaluate each specific case

*This is determined by DEC using the DEC "Officer's Guide to Emissions and Discharges Risk Assessment" May 2006.

Table 5: Emissions Risk Reduction Matrix

		Significance of Emissions				
		5	4	3	2	1
Socio-Political Context	High	A	A	B	C	D
	Medium High	A	A	B	C	D
	Medium	A	B	B	D	E
	Low	A	B	C	D	E
	No	B	C	D	E	E

PRIORITY MATRIX ACTION DESCRIPTORS

A = Do not allow (fix)

B = licence condition (setting limits + EMPs - short timeframes)(setting targets optional)

C = licence condition (setting targets + EMPs - longer timeframes)

D= EIPs, other management mechanisms/licence conditions (monitoring/reporting)/other regulatory tools

E = No regulation, other management mechanisms

Note: The above matrix is taken from the DEC Officer's Guide to Emissions and Discharges Risk Assessment May 2006.

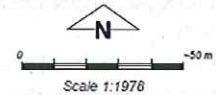


ATTACHMENT 1: PLAN OF PREMISES



LEGEND

- Local Government Authorities
- Road Centrelines
- Swan River Trust Act, Swan River Trust Management Area
- Perth Metropolitan Area Central 20cm Orthomosaic - Landgate 2007



Geocentric Datum Australia 1994
Note: the data in this map have not been projected. This may result in geometric distortion or measurement inaccuracies.

Prepared by: jessicaf
Prepared for:
Date: 29/05/2011 10:01:19 AM

Information derived from this map should be confirmed with the data custodian acknowledged by the agency acronym in the legend.



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