



# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee:**           **Origin Energy Resources Limited**

**Licence:**           **L8385/2009/3**

**Registered office:**   Australia Square  
 264 George Street  
 Sydney NSW 2000

**ACN:**                 007 845 338

**Premises address:**   Beharra Springs Gas Processing Plant  
 Lot 11945 on Plan 218173 and Lot 12453 on Plan 221090  
 DONGARA WA 6525 as depicted in Schedule 1

**Issue date:**           Thursday, 03 September 2015

**Commencement date:** Tuesday, 08 September 2015

**Expiry date:**         Monday, 07 September 2020

**Prescribed premises category**

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved Premises production or design capacity
10	Oil and gas production from wells: premises, whether on land or offshore, on which crude oil, natural gas or condensate is extracted from below the surface of the land or the seabed, as the case requires, and is treated or separated to produce stabilised crude oil, purified natural gas or liquefied hydrocarbon gases.	5,000 tonnes or more per year	218,000 tonnes per year

**Conditions**

This Licence is subject to the conditions set out in the attached pages.

Date signed: 3 September 2015

.....  
 Jonathan Bailes  
 Manager Licensing (Process Industries)  
 Officer delegated under section 20  
 of the *Environmental Protection Act 1986*



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## Introduction

This Introduction is not part of the Licence conditions.

### DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

### Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.

Licence holders are also reminded of the requirements of section 53 of the Act which places 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.



**Licence fees**

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

**Ministerial conditions**

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

**Premises description and Licence summary**

Beharra Springs is a gas processing plant (the Plant) located off Mount Adams Road, situated approximately 20 kilometers south of Dongara and approximately 350 kilometers north of Perth. The Plant is surrounded by unallocated crown land managed by the Department of Planning.

Natural gas is sourced from six wells at Beharra, two of which are high pressure wells and four are low pressure wells. The low pressure well gases are compressed by two gas compressors within the plant, where they comingle with the gas from the high pressure wells prior to entering the gas processing facility where condensate and water is removed. Hydrogen sulfide and carbon dioxide removal units purify the gas. A fenced ground flare contained in a gravel lined pit is provided to periodically flare the gas from the two compressors whenever the compressors shut down and vent the gas. A vertical flare stack is also present which continuously burns a small quantity of permeate gas. Two evaporation ponds are present west of the plant. Condensate separated out in the low temperature separator is transferred to the low-pressure condensate flash separator, which is then directed to the bunded condensate storage tank. Water and emulsion from the low-pressure condensate flash separator enters the first evaporation pond via a small Alternating Plate Interceptor (API). The condensate and emulsion settles out and is accumulated in a contained area for regular collection via skimmers. The second evaporation pond is an overflow pond used when the water level in the primary evaporation pond reaches a certain height.

This Licence is the successor to licence L8385/2009/2.

The licences and works approvals issued for the Premises since 08/08/1991 are:

Instrument log		
Instrument	Issued	Description
W684/1991/1	08/08/1991	Works Approval
W1235/1991/1	22/05/1995	Works Approval
L6791/1991/5	01/10/2000	Licence re-issue
L6791/1991/6	17/09/2001	Licence re-issue
L6791/1991/7	17/09/2002	Licence re-issue
L6791/1991/8	17/09/2003	Licence re-issue
L6791/1991/9	06/09/2005	Licence re-issue
L6791/1991/10	04/09/2007	Licence re-issue
L8385/2009/1	08/09/2009	Licence re-issue
L8385/2009/2	08/09/2012	Licence re-issue
L8385/2009/3	08/09/2015	Licence re-issue and conversion to new format

**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 *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

**'Act'** means the *Environmental Protection Act 1986*;

**'annual period'** means the inclusive period from 1 January until 31 December in the same year;

**'AS/NZS 5667.1'** means the Australian Standard AS/NZS 5667.1 Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples;

**'AS/NZS 5667.11'** means the Australian Standard AS/NZS 5667.11 Water Quality – Sampling – Guidance on sampling of groundwaters;

**'CEO'** means Chief Executive Officer of the Department of Environment Regulation;

**'CEO'** for the purpose of correspondence means:

Chief Executive Officer  
Department Administering the Environmental Protection Act 1986  
Locked Bag 33  
CLOISTERS SQUARE WA 6850  
Email: info@der.wa.gov.au

**'Licence'** means this Licence numbered L8385/2009/3 and issued under the Act;

**'Licensee'** means the person or organisation named as Licensee on page 1 of the Licence;

**'NATA'** means the National Association of Testing Authorities, Australia;

**'NATA accredited'** means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

**'Premises'** means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

**'quarterly'** means the 4 inclusive periods from 1 January to 31 March; 1 April to 30 June; 1 July to 30 September; and 1 October to 31 December;

**'Schedule 1'** means Schedule 1 of this Licence unless otherwise stated; and

**'Schedule 2'** means Schedule 2 of this Licence unless otherwise stated.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.



- 1.1.5 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 General conditions**

- 1.2.1 The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.
- 1.2.2 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.
- 1.2.3 The Licensee shall:
- (a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and
  - (b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.

Note1: *The Environmental Protection (Unauthorised Discharges) Regulations 2004* make it an offence to discharge certain materials into the environment.

**1.3 Premises operation**

- 1.3.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit, in this section.
- 1.3.2 The Licensee shall ensure that produced water is only stored within vessels or compounds provided with the infrastructure detailed in Table 1.3.1.

<b>Table 1.3.1: Containment infrastructure</b>		
<b>Vessel or compound and location on Map of emissions points and storage locations</b>	<b>Material</b>	<b>Requirements</b>
Evaporation ponds (E1 and E2)	Produced water	Lined to achieve a permeability of less than 10 <sup>-9</sup> m/s or equivalent

- 1.3.3 The Licensee shall manage evaporation ponds such that:
- (a) overtopping of the ponds does not occur;
  - (b) a freeboard at or greater than 300mm is maintained; and
  - (c) the integrity of the containment infrastructure is maintained.

**2 Emissions**

**2.1 Point source emissions to air**

- 2.1.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this Licence.

<b>Table 2.1.1: Point source emission to air</b>			
<b>Emission point reference</b>	<b>Emission Point</b>	<b>Emission point height (m)</b>	<b>Source, including any abatement</b>
A1	Gas Flare	-	Flare system for gaseous waste



### 3 Monitoring

#### 3.1 General monitoring

3.1.1 The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer’s specifications.

3.1.2 The licensee shall ensure that:

- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
- (b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and
- (c) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured.

3.1.3 The Licensee shall ensure that :

- (a) monthly monitoring is undertaken at least 15 days apart;
- (b) quarterly monitoring is undertaken at least 45 days apart; and
- (c) annual monitoring is undertaken at least 9 months apart.

#### 3.2 Monitoring of point source emissions to air

3.2.1 The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.

Table 3.2.1: Point source emission to air					
Emission point reference	Parameter	Units	Frequency	Method	
A1	Total volume of gas flared	m <sup>3</sup>	Annually	None specified	
	Nitrogen dioxide (NO <sub>2</sub> )	g/min			
	Sulfur dioxide (SO <sub>2</sub> )				
	Carbon monoxide (CO)				
	Hydrogen sulphide (H <sub>2</sub> S)				

#### 3.3 Process monitoring

3.3.1 The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.

Table 3.3.1: Process monitoring					
Monitoring point reference	Process description	Parameter	Units	Frequency	Method
-	Beharra Springs Gas Processing Plant	Consumption of chemical treatment agents.	m <sup>3</sup>	Monthly	None specified
E1 and E2	Discharge of produced water to evaporation ponds.	Volume of produced water.	m <sup>3</sup>	Monthly	

#### 3.4 Ambient environmental quality monitoring

3.4.1 The Licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table.





Table 3.4.1: Monitoring of ambient groundwater quality				
Monitoring point reference and location on Map of monitoring locations	Parameter	Units	Averaging period	Frequency
GW1, GW2, GW3, GW4, GW5, GW6 GW7, GW8 and GW9	Standing water level	m(AHD)	Spot sample	Quarterly
	pH	-		
	Total dissolved solids	mg/l		
	Total recoverable hydrocarbons			

## 4 Information

### 4.1 Records

4.1.1 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 4.1.1(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 and any subsequent licence:
  - (i) off-site environmental effects; or
  - (ii) matters which affect the condition of the land or waters.

4.1.2 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.

4.1.3 The Licensee shall complete an Annual Audit Compliance Report (AACR) 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 annual period.

4.1.4 The Licensee 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.

### 4.2 Reporting

4.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 31 calendar days after the end of the annual period. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

Table 4.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form <sup>1</sup>
-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken.	None specified
Table 3.3.1	Monthly consumption of chemical treatment agents added.	None specified
	Produced water disposal volumes	
Table 3.2.1	Summary of point source to air monitoring	AACR
Table 3.4.1	Summary of ambient groundwater monitoring	
5.1.3	Compliance	None specified
5.1.4	Complaints summary	

Note 1: Forms are in Schedule 2



### 4.3 Notification

4.3.1 The Licensee shall ensure that the parameters listed in Table 4.3.1 are notified to the CEO in accordance with the notification requirements of the table.

<b>Table 4.3.1: Notification requirements</b>			
<b>Condition or table (if relevant)</b>	<b>Parameter</b>	<b>Notification requirement<sup>1</sup></b>	<b>Format or form</b>
-	Toxicity data for new treatment chemicals used in the chemical injection system.	Within 3 weeks of the introduction of the new chemical.	None specified

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act





# Schedule 1: Maps

## Premises map

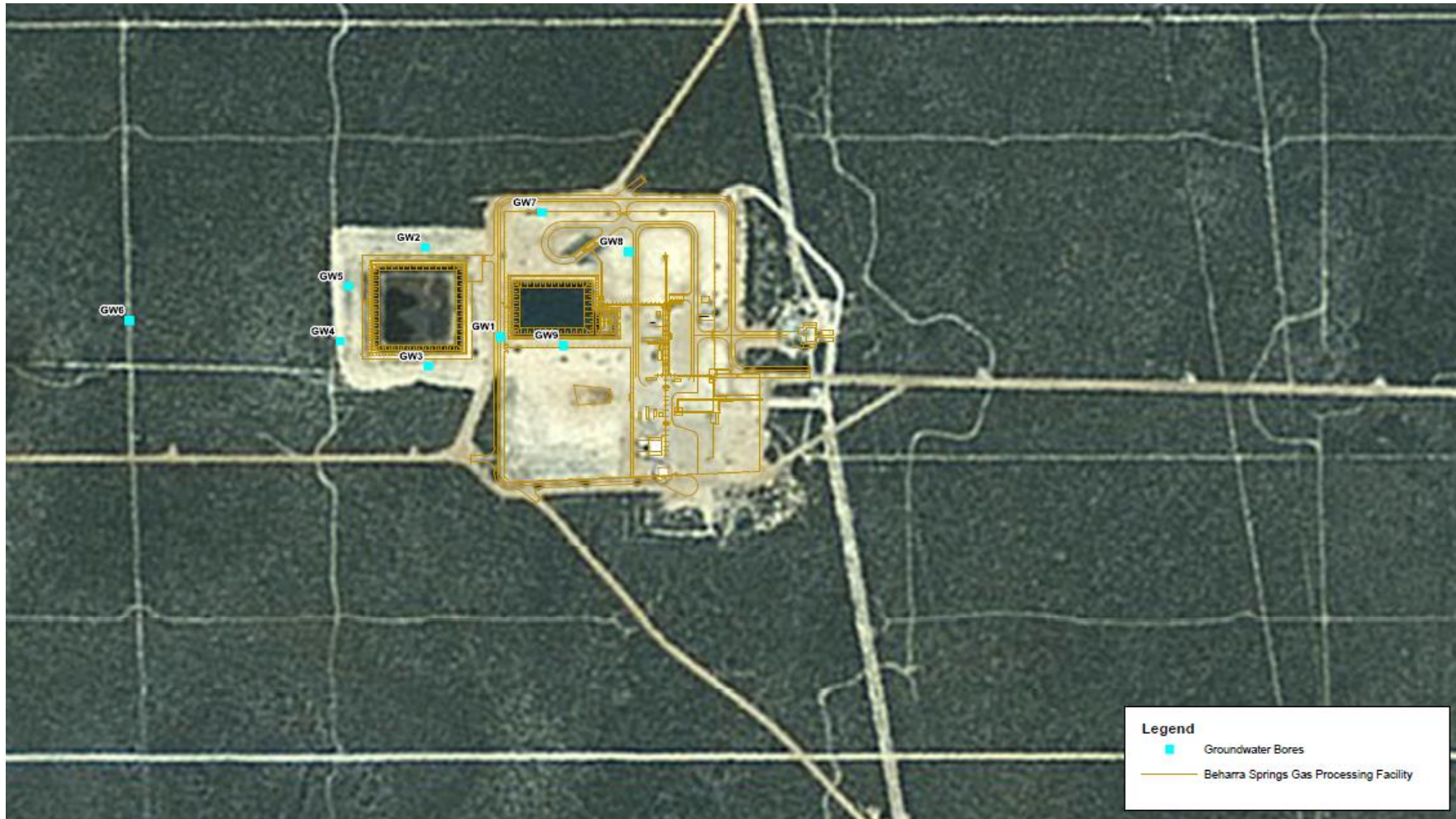
The Premises is shown in the map below. The pink line depicts the Premises boundary.





### Map of monitoring locations

The locations of the monitoring points defined in Tables 3.4.1 are shown below.

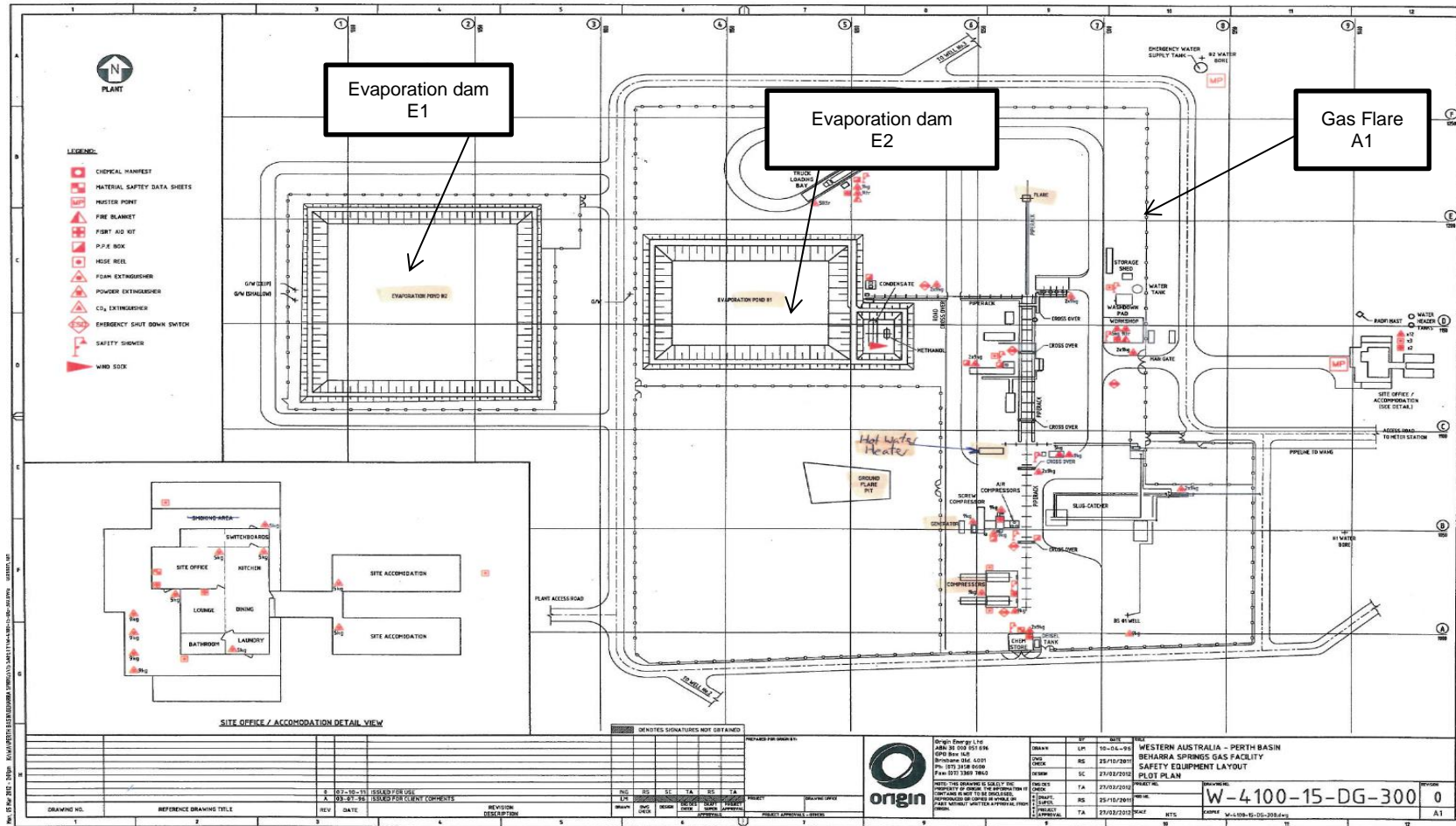






### Map of emission points and storage locations

The location of the emission point defined in Table 2.1.1 is shown below.  
The locations of the storage areas defined in Table 1.3.1 are shown below.





## 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.

### ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

#### SECTION A LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Trading as:	ABN:
Reporting period: _____ to _____	

#### STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes  Please proceed to Section C

No  Please 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.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____	<input type="checkbox"/> No
<input type="checkbox"/> Reported to DER in writing Date _____	
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the 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:	

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



## SECTION C

### SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out 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 Annual Audit Compliance Report 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 of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<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 Chief Executive Officer of the Department of Environment Regulation.
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 <i>Corporations Act 2001</i> ; 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 Chief Executive Officer of the Department of Environment Regulation.
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 Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer 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 annual audit compliance report 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)



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:        Origin Energy Resources Limited**

**Licence:            L8385/2009/3**

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**Registered office:**        Australia Square  
264 George Street  
Sydney NSW 2000

**ACN:**                        007 845 338

**Premises address:**        Beharra Springs Gas Processing Plant  
Lot 11945 on Plan 218173 and Lot 12453 on Plan 221090  
DONGARA WA 6525

**Issue date:**                Thursday, 03 September 2015

**Commencement date:**     Tuesday, 08 September 2015

**Expiry date:**                Monday, 07 September 2020

### **Decision**

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue a licence. DER considers that in reaching this decision it has taken into account all relevant considerations and legal requirements and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by:

Clint Joseph  
Licensing Officer

Decision Document authorised by:

Jonathan Bailes  
Delegated Officer





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### 1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the Environmental Protection Act 1986. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



## 2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	10	218,000 tonnes per year
Application verified	Date: 18/06/2015	
Application fee paid	Date: 04/08/2015	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i> )?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	



### **3 Executive summary of proposal and assessment**

Origin Energy Resources Limited (Origin) was issued an environmental licence (L8385/2009) to allow operation of the Beharra Springs Gas Facility(Premises).

The Beharra Oil Production Facility collects reservoir fluids from a hydrocarbon column located in the Upper Permian Beekeeper Formation. The collected reservoir fluids are processed by the Gas Production Plant. The processed gas (Sales Gas) exiting the Gas Production Plant is then piped via the Sales Gas Pipeline to the Parmelia Pipeline for transmission to Origin customers.

This Licence is the successor to licence L8385/2009/2 and continues to allow the operation of the Premises. As part of this re-issue, DER has not re-assessed the acceptability or impacts of emissions and discharges from the Premises or re-visited any existing emission control levels.



## 4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>General conditions</b>	L1.2.1, L1.2.2 and L1.2.3	<p>Operation</p> <p><u>Emission Description</u>  <i>Emission:</i> Stormwater contaminated with hydrocarbons.  <i>Impact:</i> Contamination of surrounding land and surface water drainage systems.  <i>Controls:</i> The proponent directs potentially contaminated stormwater to the lined evaporation ponds.</p> <p><u>Risk Assessment</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Possible  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            Condition 1.2.3 has been added to the licence to require the operator to operate and maintain a surface water management system that treats contaminated stormwater prior to discharge.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p>	<p>General provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><i>Environmental Protection Regulations 1987</i>.</p>



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L = Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
		<p>All conditions from the previous licence which relate to general conditions of monitoring have been converted into the new format licence.</p> <p>Conditions 2 and 9(c) on the previous licence are carried over as licence conditions 1.2.1 and 1.2.2 in the new format licence.</p>	
<b>Premises operation</b>	L1.3.2, L1.3.3 and 1.3.4	<p>All conditions from the previous licence which relate to premises operation of the evaporation ponds have been converted into the new format licence.</p> <p>Conditions 1(ii) and 12 on the previous licence are carried over as licence conditions 1.3.2, 1.3.3 and 1.3.4 in the new format licence. Conditions 1(iii) and 13 have been removed as offsite removal and disposal of waste is not regulated under this licence.</p>	
<b>Point source emissions to air including monitoring</b>	L2.1.1 and L3.2.1	<p>All conditions from the previous licence which relate to point source emissions to air including monitoring have been converted into the new format licence.</p> <p>Conditions 1(i) and 4 of the previous licence are carried over as licence conditions 2.1.1 and 3.2.1 in the new format licence.</p>	
<b>Monitoring general</b>	L3.1.1, 3.1.2 and 3.1.3	<p>All conditions from the previous Licence which relate to monitoring have been converted into the new format licence.</p> <p>Conditions 7 and 8 on the previous licence are carried over as 3.1.2.</p>	General provisions of the <i>Environmental Protection Act 1986</i> .



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>Process monitoring</b>	L3.3.1	All conditions from the previous Licence which relate to process monitoring have been converted into the new format licence.  Conditions 10(a) and 11 on the previous licence are carried over as condition 3.3.1. Condition 3.1.1 ensures all equipment used in monitoring is calibrated and condition 3.1.3 ensures sufficient time is provided between sampling events.	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004.</i>  <i>Environmental Protection Regulations 1987.</i>
<b>Ambient quality monitoring</b>	L3.4.1	All conditions from the previous Licence which relate to ambient quality monitoring have been converted into the new format licence.  Condition 6 on the previous licence is carried over as condition 3.4.1.	
<b>Information</b>	L4.2.1 and L4.3.1	All conditions from the previous Licence which relate to information have been converted into the new format licence.  Conditions 3(i) – (vi) and 10(b) on the previous licence are carried over as conditions 4.2.1 and 4.3.1.	N/A
<b>Licence Duration</b>	N/A	The site is considered low risk. DER has issued a five year licence as there are no issues associated with the Premises.	N/A



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
17/08/2015	Application advertised in West Australian.	No comments received	N/A
25/08/2015	Draft sent to proponent.	No comments received	N/A





## 6. Emissions and discharges risk assessment framework

*Note: This matrix is taken from the DER Corporate Policy Statement No. 07 – Operational Risk Management*

**Table 1: Emissions Risk Matrix**

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High