



# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee:** **GS & M Engineering Pty Ltd**

**Licence:** **L5324/1988/8**

**Registered office:** Centrepoint Tower  
 Level 3,  
 123 Colin Street  
 WEST PERTH WA 6005

**ACN:** 104 461 378

**Premises address:** Law Castings  
 12 Williams Road  
 KELMSCOTT WA 6111  
 Being Lot 108 on Plan Diagram 56240 Williams Road and Part Lot 122  
 on Diagram 59774 Brant Road, as depicted in Schedule 1.

**Issue date:** Friday, 30 October 2015

**Commencement date:** Saturday, 31 October 2015

**Expiry date:** Friday, 30 October 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
45	Metal melting or casting: premises on which metal or scrap metal is melted in furnaces or cast.	100 tonnes or more per year	500 tonnes per annual period

**Conditions**

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

Date signed: 30 October 2015

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**Lauren Trott**

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**

GS & M Engineering Pty Ltd is licensed under Category 45: Metal melting or casting within Schedule 1 of the *Environmental Protection Regulations 1987*. The premises, Law Castings, is located within the City of Armadale, around 23 kilometres (km) south east of the Perth Central Business District. Under Town Planning Scheme 4 it is zoned general industry. The closest residential areas are located approximately 300 metres (m) from the facility.

Law Castings manufacture and supply castings to a number of industries including the agricultural, mining, oil and gas, shipbuilding and automotive and rail industries.

The activities at the premises include melting and pouring of molten ferrous metals into sand cast moulds. An electric induction furnace is used to melt the metals. Castings are grinded and welded. The product range includes castings and impellers, specialising in the manufacture of impellers in a range of stainless alloys.

The primary environmental issues associated with the facility relate to air quality and include dust and fumes. There are two buildings. The main building has the induction furnace, the moulding and curing area, which has ceiling fans for the removal of any potential fumes from the casting process. The other building is used for fettling (smoothing the casts) and has a dust extraction system which uses cloth and water to prevent dust from leaving the premises.

Law Castings is a small company, currently only casting one or two days a week. There have been no recent complaints regarding negative impacts from this company on neighboring premises or residents.

This is the licence reissue, which includes the use of the current licence template.

The licences and works approvals issued for the Premises since 28/09/2000 are:

<b>Instrument log</b>		
<b>Instrument</b>	<b>Issued</b>	<b>Description</b>
L5324/1988/1	28/09/2000	New application
L5324/1988/2	25/09/2001	Licence re-issue
L5324/1988/3	25/09/2002	Licence re-issue
L5324/1988/4	17/11/2003	Licence re-issue
L5324/1988/5	05/10/2004	Licence re-issue
L5324/1988/6	17/10/2005	Licence re-issue
L5324/1988/7	21/10/2010	Licence re-issue
L5324/1988/8	22/10/2015	Licence re-issue, including conversion to new template



## 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 July until 30 June in the following year;

**'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](mailto:info@der.wa.gov.au)

**'clean scrap'** means metal which is generally free from adherent paint, rubber and plastic material and comprise not more than 1.5 per cent by weight of organic material;

**'Licence'** means this Licence numbered L5324/1988/8 and issued under the Act;

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

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

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

**'usual working day'** means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.



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

**1.3 Premises operation**

- 1.3.1 The Licensee shall ensure that all activities identified in Table 1.3.1 are undertaken in accordance with the process limits described in that Table.

<b>Table 1.3.1: Processing of materials</b>		
<b>Material</b>	<b>Process</b>	<b>Process limits</b>
Iron, steel, zinc and stainless steel	Flame cutting	All rubber lining and surface treatments are removed from scrap metal prior to flame cutting.
	Metal melting and casting	Only clean scrap metal shall be melted.

**2 Information**

**2.1 Records**

- 2.1.1 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 2.1.1(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.
- 2.1.2 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.

2.1.3 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 annual period.

2.1.4 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.

## 2.2 Reporting

2.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 60 calendar days after the end of the annual period. The report shall contain the information listed in Table 2.2.1 in the format or form specified in that table.

<b>Condition or table (if relevant)</b>	<b>Parameter</b>	<b>Format or form<sup>1</sup></b>
-	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
2.1.3	Compliance	Annual Audit Compliance Report (AACR)
2.1.4	Complaints summary	None specified

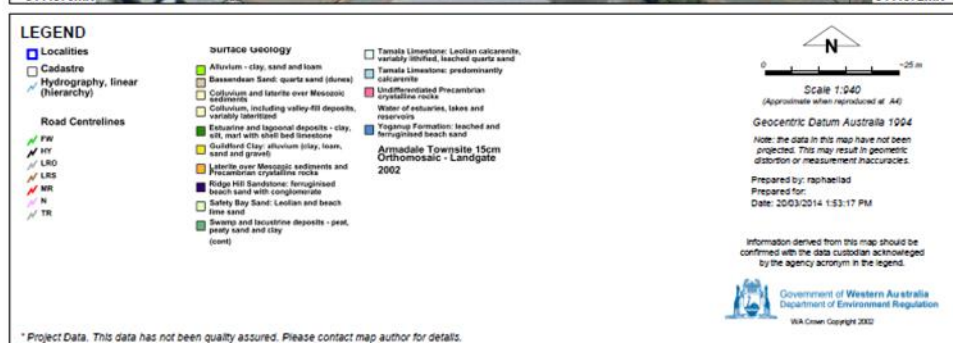
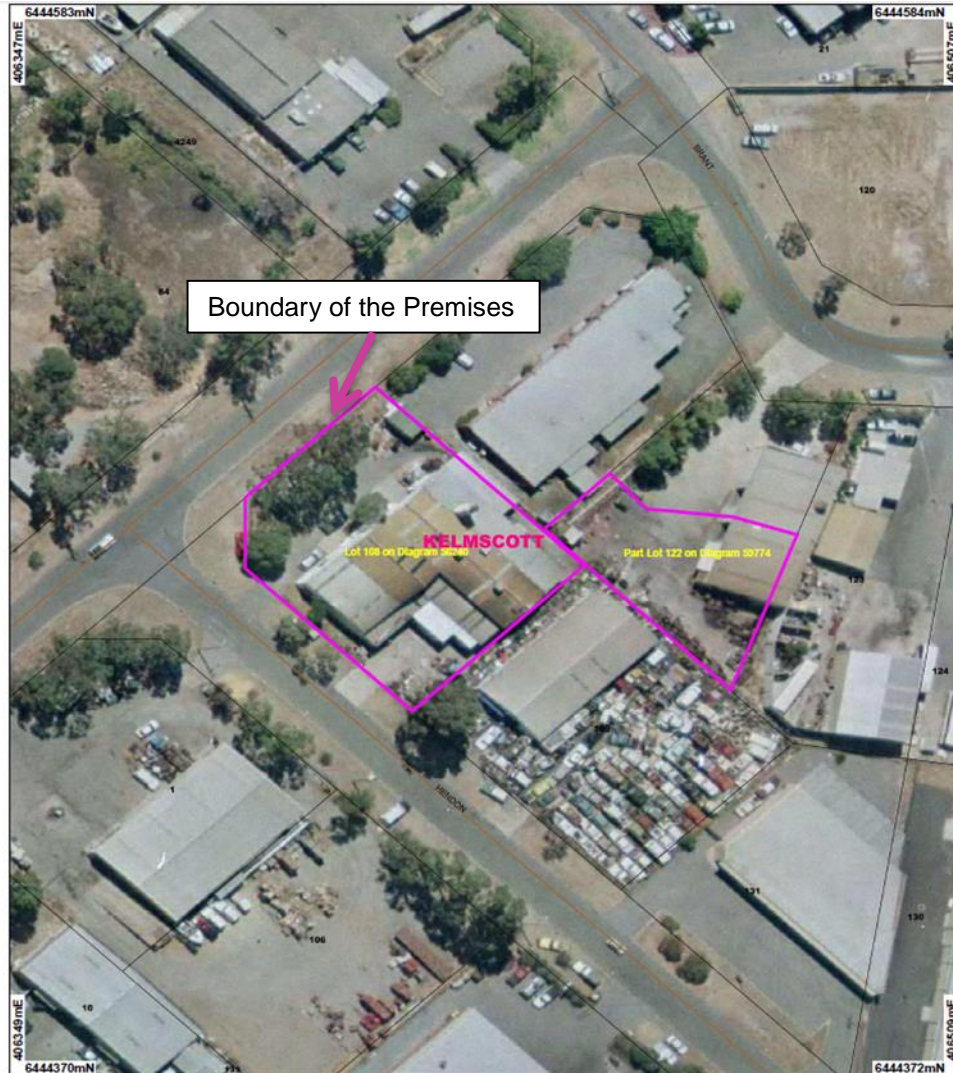
Note 1: Forms are in Schedule 2



# Schedule 1: Maps

## Premises map

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





## 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:	ABN:
Trading as:	
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 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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**Licensee:** GS & M Engineering Pty Ltd

**Licence:** L5324/1988/8

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**Registered office:** Centrepoint Tower  
Level 3,  
123 Colin Street  
WEST PERTH WA 6005

**ACN:** 104 461 378

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12 Williams Road  
KELMSCOTT WA 6111  
Being Lot 108 on Plan Diagram 56240 Williams Road and Part Lot 122 on  
Diagram 59774 Brant Road

**Issue date:** Friday, 30 October 2015

**Commencement date:** Saturday, 31 October 2015

**Expiry date:** Friday, 30 October 2020

### **Decision**

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by:

Peter Knol  
Senior Licensing Officer

Decision Document authorised by:

Lauren Trott  
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>
	45 – Metal melting or casting	500 tonnes per annual period
Application verified	Date: 02/09/2015	
Application fee paid	Date: 21/09/2015	
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"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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"/>
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**

GS & M Engineering Pty Ltd is licensed under Category 45: Metal melting or casting within Schedule 1 of the *Environmental Protection Regulations 1987*. The premises, Law Castings, is located within the City of Armadale, around 23 kilometres (km) south east of the Perth Central Business District. Under Town Planning Scheme 4 it is zoned general industry. The closest residential areas are located approximately 300 metres (m) from the facility.

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The primary environmental issues associated with the facility relate to air quality and include dust and fumes. There are two buildings. The main building has the induction furnace, the moulding and curing area, which has ceiling fans for the removal of any potential fumes from the casting process. The other building is used for fettling (smoothing the casts) and has an dust extraction system which uses cloth and water to prevent dust from leaving the premises.

Law Castings is a small company, currently only casting one or two days a week. There have been no recent complaints regarding negative impacts from this company on neighboring premises or residents.

This Decision Document has been prepared for the purpose of a licence reissue, which includes the use of the current licence template.



## 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	<p>The previous licence conditions did not include stormwater management conditions. A site visit was conducted on 24 September 2015 and it was observed that most work occurs inside buildings that have hardstand areas.</p> <p><u>Emission Description</u>  <i>Emission:</i> Potentially contaminated stormwater discharged from the premises.  <i>Impact:</i> Contamination of soil with chemicals and used resin.  <i>Controls:</i> The activities occur within the buildings, except for the storage of used resin, which is stored outside. A small chemicals storage shed is bunded.</p> <p><u>Risk Assessment</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            No regulatory controls are proposed in this licence, as this is covered by the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Residual Risk Rating:</i> Moderate</p>	<p>L5324/1988/7</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</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>
<b>Premises operation</b>	L1.3.1 L1.1.5	<p>Previous licence had conditions regarding the scrap metal and fuel that is used on site. Conditions A1, A2(a) and A4 are now covered by condition L1.3.1</p> <p>Conditions A2(b), A2(c) and A2(d) have not been retained as the intent is satisfied by condition 1.1.5 and the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p>Condition A3 is no longer relevant as there is only an electric induction furnace on site, therefore this condition has not been retained in the new licence.</p> <p>Condition S1 stated that solid waste had to be disposed of off-site in accordance with the requirements of the Director. This condition has been removed as removal of solid waste is sufficiently regulated and the licence does not authorise the disposal of waste on-site.</p>	<p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p> <p><i>General provisions of the Act.</i></p>
<b>Emissions general</b>	-	No conditions proposed for emissions general in this licence.	N/A
<b>Point source emissions to air including monitoring</b>	-	No conditions proposed for point source emissions to air in this licence.	N/A
<b>Point source emissions to surface water including monitoring</b>	-	No conditions proposed for point source emissions to surface water in this licence.	N/A
<b>Point source emissions to groundwater including monitoring</b>	-	No conditions proposed for point source emissions to groundwater in this licence.	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Emissions to land including monitoring	L1.2.2	<p>Previous licence condition W1 contained bunding requirements. This condition has not been included in this licence as the consequence of not containing chemicals within the bunding in case of a spill is covered by condition 1.1.5, the general provisions of the Act and also by the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p> <p>Licence condition L1.2.2 satisfies the intend of previous condition W1(c).</p>	<p>General provisions of the Act</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p>
Fugitive emissions	-	<p>Condition A5 is covered by the general provisions of the Act and as such not retained in the new licence.</p> <p><u>Emission Description</u>  <i>Emission:</i> Fugitive dust from the premises.  <i>Impact:</i> Health/nuisance impact if dust levels are high. Residential properties are located approximately 300 metres from the premises, but there are several industrial premises in between.  <i>Controls:</i> The activities occur within the buildings. Used resin is regularly removed from the premises to a landfill.</p> <p><u>Risk Assessment</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            No regulatory controls are proposed in this licence, as this is covered by the general provisions of the Act.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor</p>	<p>General provisions of the Act</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>
		<i>Likelihood: Unlikely Residual Risk Rating: Moderate</i>	
<b>Odour</b>	-	No conditions proposed for odour in this licence	General provisions of the Act
<b>Noise</b>	-	No conditions proposed for noise in this licence	<i>Environmental Protection (Noise) Regulations 1997</i>
<b>Monitoring general</b>	-	No monitoring conditions proposed in this licence	N/A
<b>Monitoring of inputs and outputs</b>	-	No conditions proposed regarding monitoring of inputs and outputs in this licence.	N/A
<b>Process monitoring</b>	-	No process monitoring conditions proposed in this licence	N/A
<b>Ambient quality monitoring</b>	-	No ambient quality monitoring conditions proposed in this licence	N/A
<b>Meteorological monitoring</b>	-	No Meteorological monitoring conditions proposed in this licence	N/A
<b>Improvements</b>	-	No improvement conditions proposed in this licence	N/A
<b>Information</b>	L2	Licence conditions regarding recording complaints and reporting of an Annual Environmental Report and Annual Audit Compliance Report will be included in this licence.	
<b>Licence Duration</b>		The premises is a low risk operation to the department and in line with the Department's policy on licence duration this licence can be issued for 5 years.	



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
28/09/2015	Application advertised in West Australian (or other relevant newspaper)	No comments received	N/A
27/10/2015	Proponent sent a copy of draft instrument	28/10/2015 comment requesting administrative change	Change implimented



## 6 Risk Assessment

*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