



Licence

Environmental Protection Act 1986, Part V

Licensee: Australian Comfort Group Pty Ltd

Licence: L8902/2015/1

Registered office: 48 Alexandra Place
MURARRIE QLD 4172

ACN: 098 742 584

Premises address: Dunlop Foams
Lot 1 on Diagram 46983 Cooper Road
COCKBURN CENTRAL WA 6164
as depicted in Schedule1.

Issue date: Friday, 17 July 2015

Commencement date: Monday, 20 July 2015

Expiry date: Sunday, 19 July 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
51	Foam products manufacturing: premises on which resin is used to prepare or manufacture plastic foam or plastic foam products using MDI (diphenylmethane di-isocyanate) or TDI (toluene-2, 4-di-isocyanate)	1 tonne or more per year	2,200 tonnes per annual period

Conditions

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

.....
 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

Australian Comfort Group Pty Ltd operate Dunlop Foams in Cockburn Central, a suburb south of Perth. It is located in an area zoned industrial with surrounding areas zoned for mixed business, light industrial and the closest residential properties approximately 300m south east of the premises.

Dunlop Foams manufacture flexible polyurethane slabstock foam (FPSF) which is a soft sponge-like material produced by expanding certain polyurethane plastics. It is used in a variety of domestic applications such as furniture, bedding and vehicle upholstery as a cushioning material. Toluene-2, 4-di-iso-cyanate (TDI) is the only isocyanate currently used in Australia for the production of FPSF. The majority of the TDI used in the process reacts with the polyurethane and water, and the reaction products (except for carbon dioxide) are locked into the polyurethane structure. The blowing agent used is methylene chloride which is an air emission of interest along with TDI. Vapours are collected and ducted to a scrubber prior to being emitted to air.

The manufacture of FPSF is a batch process therefore any emissions to air via the scrubber are relatively short-term over the course of 15 mins to an hour. Emissions are also dependent on the type of foam being produced. Production of low-density foam typically produces higher emissions of methylene chloride when compared to high-density foam which typically produces no methylene chloride emissions. The manufacture of FPSF requires storage and handling of several hazardous chemicals. The manufacture of FPSF does not involve the creation of wastewater or excessive noise with the primary issue being the control of emissions to air.

This Licence is a new licence for the Dunlop Foams premises and it is the successor to licence L6874/1989/12. The licences and works approvals issued for the Premises since 21/05/2009 are:

Instrument log		
Instrument	Issued	Description
L6874/1989/11	21/05/2009	Licence reissue
L6874/1989/12	16/05/2014	Licence reissue and conversion to new format
L8902/2015/1	17/07/2015	New 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 *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 30 May until 29 May in the following year;

'AS 4323.1' means the Australian Standard AS4323.1 *Stationary Source Emissions Method 1: Selection of sampling positions*;

'averaging period' means the time over which a limit is measured or a monitoring result is obtained;

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

'CEO' for the purpose of correspondence means;

Manager - Licensing (Process Industries)

At the following address:

Department of Environment Regulation

Locked Bag 33

CLOISTERS SQUARE WA 6850

Telephone: (08) 9333 7510

Facsimile: (08) 9333 7550

Email: industry.regulation@der.wa.gov.au;

'code of practice for the storage and handling of dangerous goods' means the document titled "Storage and handling of dangerous goods: Code of Practice" published by the Department of Mines and Petroleum, as amended from time to time;

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

'DF01-TS-0822' means the stack emissions testing method *Monitoring TDI and Methylene Chloride Vapours in Exhaust Stacks Using Instrumental Gas Analysers*, Dunlop Foams, dated 3 August 2011, Reference DF01-TS-0822;

'Licence' means this Licence numbered L8902/2015/1 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;



'normal operating conditions' means any operation of a particular process (including abatement equipment) excluding start-up, shut-down and upset conditions, in relation to stack sampling or monitoring;

'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;

'Schedule 2' means Schedule 2 of this Licence unless otherwise stated;

'stack test' means a discrete set of samples taken over a representative period at normal operating conditions;

'STP dry' means standard temperature and pressure (0°Celsius and 101.325 kilopascals respectively), dry;

'TDI' means toluene-2, 4-di-isocyanate and toluene-2,6-di-isocyanate;

'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 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.¹

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



2 Emissions

2.1 General

2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit specified in any part of section 2 of this Licence.

2.2 Point source emissions to air

2.2.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emission points to air			
Emission point reference and location on Premises emissions and monitoring map	Emission Point	Emission point height (m)	Source, including any abatement
A1	TDI scrubber stack	19.5m	Foam pouring, conveying and continuous foam line areas via vapour scrubbing unit

2.2.2 The Licensee shall not cause or allow point source emissions to air greater than the limits listed in Table 2.2.2.

Table 2.2.2: Point source emission limits to air			
Emission point Reference	Parameter	Limit (including units)¹	Averaging period
A1	TDI	0.3 g/min	Stack test (averaging period should extend for the duration of batch process)
	Methylene chloride	3,000 g/min	Stack test (averaging period should extend for the duration of batch process)

Note 1: All units are referenced to STP dry

3 Monitoring

3.1 General monitoring

3.1.1 The Licensee shall record production or throughput data and any other process parameters relevant to any non-continuous monitoring undertaken.

3.1.2 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 and the requirements of the Licence.

3.1.3 The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.

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: Monitoring of point source emissions to air					
Emission point reference	Parameter	Units¹	Averaging period	Frequency^{2,3}	Method
A1	Volumetric flow rate	m ³ /s	n/a	Bi-annual	DF01-TS-0822
	TDI	g/s	Batch ⁴		
	Methylene chloride	g/s	Batch ⁴		

Note 1: All units are referenced to STP dry

Note 2: Monitoring shall be undertaken to reflect normal operating conditions and any limits or conditions on inputs or production.

Note 3: monitoring is to be undertaken twice a year on different batches.

Note 4: Averaging period should extend for the duration of batch process.

3.2.2 The Licensee shall ensure that sampling required under Condition 3.2.1 of the Licence is undertaken at sampling locations in accordance with the AS 4323.1.

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 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 56 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 form¹
-	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 3.2.1	Volumetric flow rate, TDI, methylene chloride	None specified
Condition 4.1.3	Compliance	Annual Audit Compliance Report (AACR)
Condition 4.1.4	Complaints summary	None specified
Condition 3.1.2	Calibration report	None specified

Note 1: Forms are in Schedule 2

- 4.2.2 The Licensee shall ensure that the Annual Environmental Report also contains:
- (a) any relevant process, production or operational data recorded under Condition 3.1.1; and
 - (b) an assessment of the information contained within the report against previous monitoring results and Licence limits.

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.

Table 4.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement	Format or form¹
Condition 2.1.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5pm of the next usual working day.	N1
Condition 3.1.3	Calibration report	As soon as practicable.	None specified

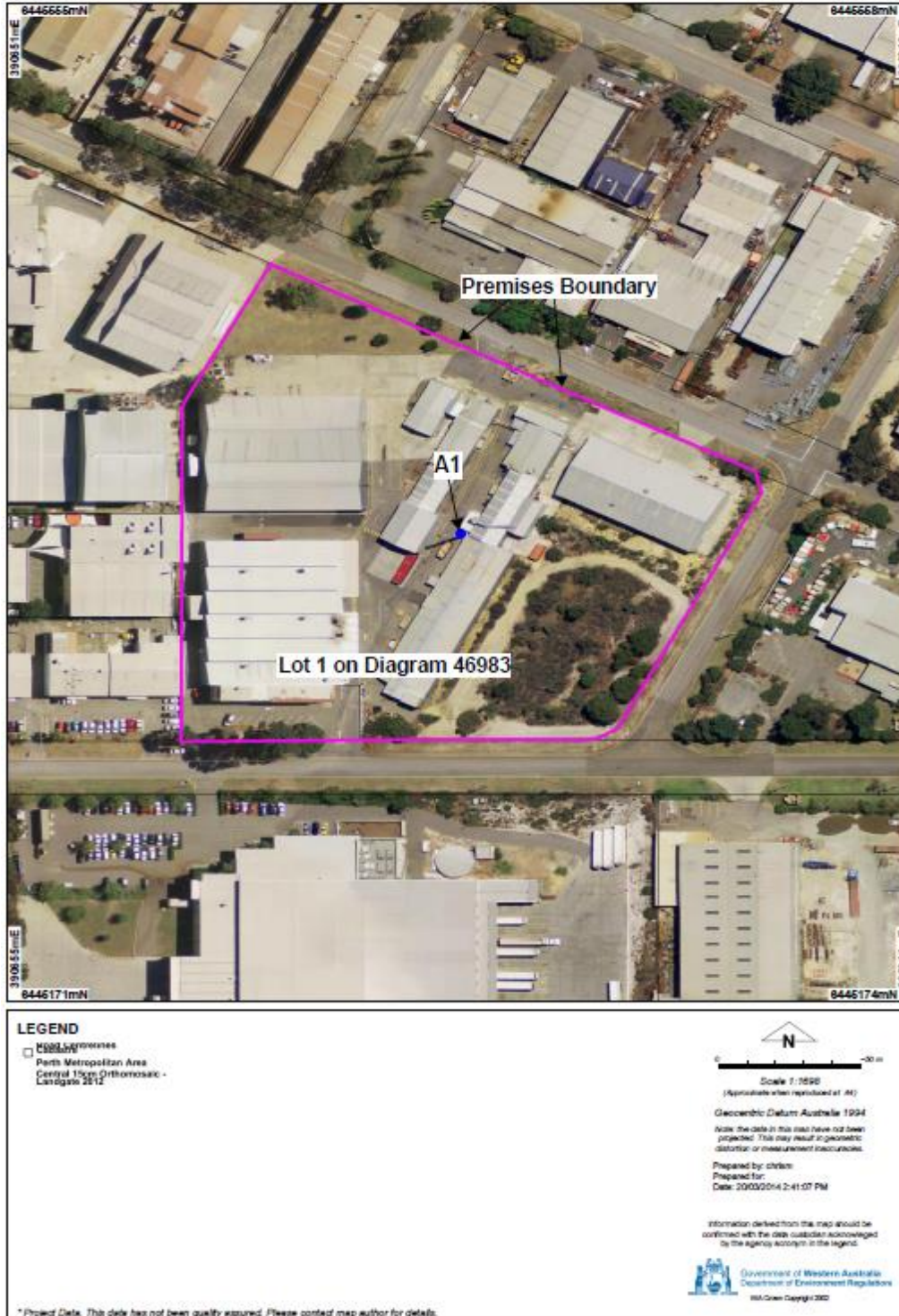
Note 1: Forms are in Schedule 2



Schedule 1: Maps

Premises, emissions and monitoring map

The Premises, emissions point and monitoring point 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: 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 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)



Licence: L8902/2015/1
Form: N1

Licensee: Australian Comfort Group Pty Ltd
Date of breach:

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	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit	
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	

Part B

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 previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of Australian Comfort Group Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Australian Comfort Group Pty Ltd

Licence: L8902/2015/1

Registered office: 48 Alexandra Place
MURARRIE QLD 4172

ACN: 098 742 584

Premises address: Dunlop Foams
Lot 1 on Diagram 46983 Cooper Road
COCKBURN CENTRAL WA 6164

Issue date: Friday, 17 July 2015

Commencement date: Monday, 20 July 2015

Expiry date: Sunday, 19 July 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.

Decision Document prepared by: Nanette Schapel
Licensing Officer

Decision Document authorised by: Lauren Trott
Manager Licensing



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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	Category number(s)	Assessed design capacity
	50	2,200 tonnes per annual period
Application verified	Date: 08/07/2015	
Application fee paid	Date: 09/07/2015	
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

Australian Comfort Group Pty Ltd operate Dunlop Foams in Cockburn Central, a suburb south of Perth. It is located in an area zoned industrial with surrounding areas zoned for mixed business, light industrial and the closest residential properties are approximately 300m south east of the premises.

Dunlop Foams manufacture flexible polyurethane slabstock foam (FPSF) which is a soft sponge-like material produced by expanding certain polyurethane plastics. It is used in a variety of domestic applications such as furniture, bedding and vehicle upholstery as a cushioning material. Toluene-2, 4-di-iso-cyanate (TDI) is the only isocyanate currently used in Australia for the production of FPSF. The majority of the TDI used in the process reacts with the polyurethane and water, and the reaction products (except for carbon dioxide) are locked into the polyurethane structure. The blowing agent used is methylene chloride which is an air emission of interest along with TDI. Vapours are collected and ducted to a scrubber prior to being emitted to air. Following a recent site inspection (June 2015), it was noted that methylene chloride is likely to be discontinued in the production process in the near future.

The manufacture of FPSF is a batch process therefore any emissions to air via the scrubber are relatively short-term over the course of 15 minutes to an hour. Emissions are also dependent on the type of foam being produced. Production of low-density foam typically produces higher emissions of methylene chloride when compared to high-density foam which typically produces no methylene chloride emissions. The manufacture of FPSF requires storage and handling of several hazardous chemicals. The manufacture of FPSF does not involve the creation of wastewater or excessive noise with the primary emission being the control of emissions to air.

This Licence is a new licence and the successor to licence L6874/1989/12 which expired on 30 June 2015. DER has not re-assessed the acceptability or impacts of emissions and discharges from the Premises or re-visited any existing emission control levels in the issuing of this licence.



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.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.1	Previous condition L1.2.1 has been moved to Section 1.1 Interpretation. General conditions have not been reassessed as part of this new Licence process. Conditions L1.2.2 to L1.2.4 in previous licence are now Conditions L1.2.1 to L1.2.3.	Reg 3 of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>
Emissions general	L2.1.1	Descriptive limits will be set through condition L2.2.2 of the licence, see below for risk assessment. Condition L2.1.1 has been amended to remove the words 'and/or target' as there are no targets in the licence conditions.	N/A
Point source emissions to air including monitoring	L1.2.1, L2.1.1 L2.2.2 L3.2.1	Point source emissions to air have not been reassessed as part of this new licence process. Condition L1.2.1 duplicates previous condition L1.2.2 and requires the Operator to maintain all pollution control equipment according to manufacturer's specifications. Conditions regulating emissions are the same as the previous Licence where L2.2.1 requires all point source emissions to air to be discharged through the TDI scrubber stack. Condition 2.2.2 sets limits for TDI and MeCl emitted through the TDI scrubber stack and Condition 3.2.1 requires monitoring of emissions from the TDI scrubber stack in accordance with method DF01-TS-0822.	N/A
Point source emissions to surface water including monitoring	N/A	There are no point source emissions to surface water from the premises that require regulation through this section. Condition L1.1.5 applies.	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to groundwater including monitoring	N/A	There are no point source emissions to groundwater.	
Emissions to land including monitoring	N/A	There are no point source emissions to land from the premises.	
Fugitive emissions	N/A	Fugitive emissions have not been reassessed as part of this licence process. As the previous licence did not impose conditions, no specified conditions have been included for fugitive emissions.	
Odour	N/A	Odour emissions have not been reassessed as part of this licence process. As the previous licence did not impose conditions, no specified conditions have been included for odour emissions.	
Noise	N/A	Noise has not been reassessed as part of this licence process. As the previous licence did not impose controls on noise, no specified conditions have been included. The <i>Environmental Protection (Noise) Regulations 1997</i> and Condition L1.1.5 apply.	<i>Environmental Protection (Noise) Regulations 1997</i>
Monitoring general	L3.1.1 L3.1.2 L3.1.3	As noted under Point source emissions to air including monitoring, Condition 3.1.1 requires the Operator to record production data, Condition 3.1.2 requires all monitoring equipment to be calibrated in accordance with the manufacturer's specifications and Condition 3.1.3 requires that, where calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, it is brought to the attention of the CEO along with a report detailing modifications to the methods used.	
Monitoring of inputs and outputs	N/A	Monitoring of inputs and outputs is not required and no specified conditions have been included on the Licence	
Process monitoring	N/A	As the previous licence did not require process monitoring no specified conditions have been included in this section.	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Ambient quality monitoring	N/A	As the previous licence did not require ambient quality monitoring no specified conditions have been included in this section.	
Meteorological monitoring	N/A	As the previous licence did not require meteorological monitoring no specified conditions have been included in this section.	
Improvements	N/A	There are no improvement conditions required for this Licence	
Information	L4.1.3 L4.1.4 L4.2.1	Condition L4.1.3 replaces previous condition L5.1.3 and requires the Licensee to provide an Annual Audit Compliance Report, Condition L4.1.4 replaces previous condition L5.1.4 and requires a complaints management system to be implemented and all complaints recorded, Condition L4.2.1 replaces previous condition L5.2.1 and requires an Annual environmental Report to be submitted.	N/A
Licence Duration	N/A	A risk assessment for overall operations at the Premises have been assessed as low priority and it is recommended that the duration for this licence be issued for a period of 5 years.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
13/07/2015	Application advertised in West Australian	No comments received	N/A
14/07/2015	Proponent sent a copy of draft instrument	No changes required	N/A



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