



Licence

Environmental Protection Act 1986, Part V

Licensee: **Giacci Bros Pty Ltd**

Licence: **L8939/2015/1**

Registered office: Level 27, 45 Clarence Street
SYDNEY NSW 2000

ACN: 008 708 361

Premises address: Qube Bulk
Mandurah Road
EAST ROCKINGHAM WA 6169
Being Lot 803 on Plan 55354 as depicted in Schedule 1

Issue date: Thursday, 17 March 2016

Commencement date: Monday, 21 March 2016

Expiry date: Thursday, 20 March 2036

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
33	Chemical blending or mixing: premises on which chemicals or chemical products are mixed, blended or packaged in a manner that causes or is likely to cause a discharge of waste into the environment	500 tonnes or more per year	110,000 tonnes per annual period

Conditions

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

Date signed: 18 March 2016

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



Contents

Introduction	2
Licence conditions	4
1 General	4
2 Emissions	5
3 Monitoring	6
4 Improvements	6
5 Information	7
Schedule 1: Maps	9
Schedule 2: Reporting & notification forms	11

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

Qube Bulk in arrangement with Co-operative Bulk Handling Limited (CBH) has agreed to provide storage and handling services for CBH from Qube's owned and operated storage facilities located at Rockingham (Mandurah Rd East Rockingham WA).

The Qube Bulk (Rockingham) site is located on flat land and surrounded by industrial and commercial use land. There are some common/reserve areas located to the south and east of the facility. The east and west of the property are unused land. There are no known wetlands, waterways or sensitive receptors in the immediate area (<1.5km). Groundwater is estimated to be four metres below ground level with seasonal fluctuations between 0.5m and 3.0m.

The site comprises facilities used for the storage, blending, and loading of trucks with products including:

- mono-ammonium phosphate (MAP) - stored in bulk (large volume)
- copper sulphate – stored in bags or as applicable (small volume)
- zinc sulphate– stored in bags or as applicable (small volume)
- flutriol – (small volume)
- urea – stored in bulk (large volume)

The total storage capacity at the site is 20,000 tonnes.

All unloading of bulk materials and blending activities takes place within an enclosed shed. The area is cleaned prior to a truck entering the sheds; the trucks reverse into the shed and rear tip. A dedicated front end loader is located within the sheds to push up or transfer the product into stockpiles. The truck chassis and tailgate is swept off after unloading to remove any product before the vehicle exits the sheds.

All blending is done in the sheds using specific blending equipment. All transfer points on the blending system are enclosed to minimise dust generation (see Appendix A).

All loading of product into trucks is done on the sealed apron outside the shed door through a chute designed to minimise dust. Trucks are cleaned (air-blown) to remove any product spillages and loads covered before being dispatched. Any product spilt on the sealed aprons is immediately recovered.

Runoff from the roof of the facility is collected and directed towards soak wells on site. Bio-retention basins have been installed to collect potentially contaminated stormwater from the shed apron.

The main emissions of concern from the proposed activity are fugitive emissions (dust and spills) of fertiliser products.

The Licensee has an Environmental Management System (EMS) and procedures in place that are certified to the ISO14001 Environmental Management Systems standard.



This Licence is for the operation of the new facility established under Works Approval W5871/2015/1

The licences and works approvals issued for the Premises are:

Instrument log		
Instrument	Issued	Description
W5871/2015/1	20/11/2015	Works Approval
L8939/2015/1	DRAFT	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 1 April to 31 March in the following 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 5667.10' means the Australian Standard AS/NZS 5667.10 *Water Quality – Sampling – Guidance on sampling of waste waters*;

'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:

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

'controlled waste' has the definition in *Environmental Protection(Controlled Waste) Regulations 2004*;



‘Licence’ means this Licence numbered L8939/2015/1 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;

‘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; and

‘spot sample’ means a discrete sample representative at the time and place at which the sample is taken.

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 immediately recover, or remove and dispose of spills of fertiliser raw materials or products outside of the storage sheds.

1.2.2 The Licensee shall implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises.

2 Emissions

2.1 Emissions to land

2.1.1 The Licensee shall ensure that where waste is emitted to land from the emission points in Table 2.1.1 it is done so in accordance with the conditions of this Licence.

Table 2.1.1: Emission points to land

Emission point reference and location on map of emission points to land	Description	Source including abatement
S1	Soak well	Stormwater



3 Monitoring

3.1 General monitoring

3.1.1 The licensee shall ensure that:

- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
- (b) all wastewater samples are collected in accordance with AS/NZS 5667.10; and
- (c) all samples are submitted to a laboratory with current NATA accreditation for the parameters to be measured.

3.1.2 The Licensee shall ensure that monthly monitoring is undertaken at least 15 days apart.

3.2 Monitoring of emissions to land

3.2.1 The Licensee shall undertake the monitoring in Table 3.5.1 according to the specifications in that table.

Table 3.2.1: Monitoring of emissions to land			
Emission point reference	Parameter	Units	Frequency
S1 - Within the premises drainage channel at a location as close as possible to the emission point	Chemical Oxygen Demand	mg/L	Monthly when flowing
	Total Phosphorus		
	Total Nitrogen		
	Nitrate-nitrogen		
	Ammonia nitrogen		
	Copper		
	Cobalt		
	Zinc		
	Total Dissolved Solids		
	Sulfur		
	Sulfate		
	Magnesium		
	Manganese		
pH ¹	-		

Note 1: In-situ non-NATA accredited analysis permitted

3.3 Monitoring of inputs and outputs

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: Monitoring of inputs and outputs		
Input/Output	Units	Averaging period
Raw materials received	Tonnes	Monthly
Product dispatched		

4 Improvements

4.1 Improvement program

4.1.1 The Licensee shall complete the improvements in Table 4.1.1 by the date of completion in Table 4.1.1.

4.1.2 The Licensee, for improvements not specifically requiring a written submission, shall write to the CEO stating whether and how the Licensee is compliant with the improvement within one week of the completion date specified in Table 4.1.1.



Table 4.1.1: Improvement program		
Improvement reference	Improvement	Date of completion
IR1	<p>The Licensee shall install at least one dedicated groundwater monitoring well down hydraulic gradient of the soak well and bio-retention basins in the direction of groundwater flow.</p> <p>Well installation and construction (including preparation of well construction logs) shall be in accordance with the National Environment Protection (Assessment of Site Contamination) Measure 1999 – Schedule B2, Section 8.2.</p> <p>The licensee shall prepare and submit to DER a report outlining the installation of the dedicated groundwater monitoring wells. The report shall include, but not be limited to, well construction logs, well location and GPS coordinates, site plan depicting well location, and results of any baseline monitoring undertaken.</p>	01/08/2016

5 Information

5.1 Records

- 5.1.1 All information and records required by the Licence shall:
- (a) be legible;
 - (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
 - (c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
 - (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or waters.
- 5.1.2 The Licensee shall ensure that:
- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
 - (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.
- 5.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.
- 5.1.4 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.

5.2 Reporting

- 5.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 28 calendar days after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.



Table 5.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or 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	Monitoring of emissions to land	None specified
Table 3.6.1	Monitoring of inputs and outputs	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

5.2.2 The Licensee shall ensure that the Annual Environmental Report also contains an assessment of the information contained within the report against previous monitoring results.

5.2.3 The Licensee shall submit the information in Table 5.2.2 to the CEO according to the specifications in that table.

Table 5.2.2: Non-annual reporting requirements				
Condition or table (if relevant)	Parameter	Reporting period	Reporting date (after end of the reporting period)	Format or form¹
-	Copies of original monitoring reports submitted to the Licensee by third parties	Not Applicable	Within 14 days of the CEOs request	As received by the Licensee from third parties

Note 1: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the map below. The red 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 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"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
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

Proponent: Giacci Bros Pty Ltd

Licence: L8939/2015/1

Registered office: Level 27, 45 Clarence Street
SYDNEY NSW 2000

ACN: 008 708 361

Premises address: Qube Bulk
Mandurah Road
EAST ROCKINGHAM WA 6169
Being Lot 803 on Plan 55354

Issue date: Thursday, 17 March 2016

Commencement date: Monday, 21 March 2016

Expiry date: Thursday, 20 March 2036

Decision

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

Decision Document prepared by: Clint Joseph
Licensing Officer

Decision Document authorised by: Jonathan Bailes
Delegated Officer



Contents

1	Purpose of this Document	2
2	Administrative summary	3
3	Executive summary of proposal and assessment	4
4	Decision table	5
5	Advertisement and consultation table	10
6	Risk Assessment	11

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
	33	110,000 tonnes per year
Application verified	Date: 22/12/2015	
Application fee paid	Date: 06/01/2016	
Works Approval has been complied with	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
Compliance Certificate received	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input 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"/>	Referral decision No: Managed under Part V <input type="checkbox"/>
		Assessed under Part IV <input 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"/>	Ministerial statement No: EPA Report No:
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

Qube Bulk in arrangement with Co-operative Bulk Handling Limited (CBH) has agreed to provide storage and handling services for CBH from Qube's owned and operated storage facilities located at Rockingham (Mandurah Rd East Rockingham WA).

The Qube Bulk (Rockingham) site is located on flat land and surrounded by industrial and commercial use land. There are some common/reserve areas located to the south and east of the facility. The east and west of the property are unused land. There are no known wetlands, waterways or sensitive receptors in the immediate area (<1.5km). Groundwater is estimated to be four metres below ground level with seasonal fluctuations between 0.5m and 3.0m.

The site comprises facilities used for the storage, blending, and loading of trucks with products including:

- mono-ammonium phosphate (MAP) - stored in bulk (large volume)
- copper sulphate – stored in bags or as applicable (small volume)
- zinc sulphate– stored in bags or as applicable (small volume)
- flutriol – (small volume)
- urea – stored in bulk (large volume)

The total storage capacity at the site is 20,000 tonnes.

All unloading of bulk materials and blending activities takes place within an enclosed shed. The area is cleaned prior to a truck entering the sheds; the trucks reverse into the shed and rear tip. A dedicated front end loader is located within the sheds to push up or transfer the product into stockpiles. The truck chassis and tailgate is swept off after unloading to remove any product before the vehicle exits the sheds.

All blending is done in the sheds using specific blending equipment. All transfer points on the blending system are enclosed to minimise dust generation (see Appendix A).

All loading of product into trucks is done on the sealed apron outside the shed door through a chute designed to minimise dust. Trucks are cleaned (air-blown) to remove any product spillages and loads covered before being dispatched. Any product spilt on the sealed aprons is immediately recovered.

Runoff from the roof of the facility is collected and directed towards soak wells on site. Bio-retention basins have been installed to collect potentially contaminated stormwater from the shed apron.

The main emissions of concern from the proposed activity are fugitive emissions (dust and spills) of fertiliser products.

The Licensee has an Environmental Management System (EMS) and procedures in place that are certified to the ISO14001 Environmental Management Systems standard.

This Licence is for the operation of the new facility established under Works Approval W5871/2015/1



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
Emissions to Land including monitoring and Fugitive emissions	L1.2.1 - L1.2.2 L2.1.1 L3.1.1 – L3.3.1 L4.1.1 – L4.1.2	<p>Operation</p> <p><i>Emission:</i> Fugitive dust emissions from:</p> <ul style="list-style-type: none"> • Unloading bulk materials in the shed by tipper truck; • Stockpile management (pushing up stockpile in shed with front end loader); • Blending activities (transfer of materials into hopper inside shed); • Loading from storage onto trucks for bulk transport; • Vehicle movements (material tracked out of sheds on wheels when vehicles exit); • Split/damage to packaged blending materials resulting in a spill or leak from the package. <p><i>Impact:</i> Nuisance emissions to nearby receptors; and soil or water contamination due to deposition.</p> <p><i>Controls:</i></p> <ul style="list-style-type: none"> • Shed positioning and design considers prevailing wind direction; • Sheds have one entry/exit door which will be open only during stockpile transfer operations; • Sealed surfaces to be regularly swept to minimise tracking of material from the shed and windblown material from the apron surface; • Hand sweeping, vacuum truck or sweeper will be used to clean up any spillage on the apron as appropriate; • Suspend operations in high wind; • Trucks will be loaded with the product on the apron of the shed through a chute designed to minimise dust; 	<p>Application supporting documentation</p> <p><i>Environmental Protection Act 1986</i></p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<ul style="list-style-type: none"> Trucks will be covered once loaded; Operational procedures in place that require trucks to be swept off if any spillage on chassis/tailgate area; Unloading will occur within the enclosed shed; Chemicals for blending are in packaged form and stored and handled inside the shed; Daily visual inspection of the shed and surrounding area; Spill reporting procedures in place; Spill response arrangements in place to control, contain and clean up any spills; and Shed floor to be regularly swept and kept clean. <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Likely (rare for nuisance to residents due to separation distance). <i>Risk Rating:</i> Moderate (low for nuisance impacts)</p> <p><u>Regulatory Controls</u> No regulatory controls have been included in the licence for the fugitive dust aspect causing a nuisance impact off-site. Controls are required to address the moderate risk of dust deposition contaminating stormwater (see assessment below).</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Likely (rare for nuisance to residents due to separation distance). <i>Risk Rating:</i> Moderate (low for nuisance impacts)</p> <p>Operation <i>Emission:</i> Stormwater contaminated with nutrients and metals. Potential for the discharge of product to the stormwater sump via spillage or stormwater run-off. <i>Impact:</i> Eutrophication of water in the stormwater sump on property and resultant contamination</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>of ground and groundwater. There are no waterways in the immediate area. Groundwater is estimated to be four metres below ground level with seasonal fluctuations between 0.5m and 3.0m.</p> <p><i>Controls:</i> Housekeeping measures and other controls that will be used to minimise fugitive dust deposition are detailed above. Runoff from the roof of the facility will be collected and directed towards a soak well on site. Bio-retention basins have been installed at the approximate midpoint of the site on the northern and southern boundaries. Runoff from the external apron areas where the fertilizer materials are handled is directed to these basins. The basins contain high phosphorous retention index soils and are planted with nutrient stripping vegetation to facilitate onsite water treatment. A stormwater management plan has been developed detailing how potentially contaminated water will be minimised and managed.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> The following conditions have been applied to the licence:</p> <ul style="list-style-type: none"> • Condition 1.2.1 - the requirement to clean up spills outside of the sheds. • Condition 1.2.2 – requirement to implement all practical measures to prevent stormwater run-off becoming contaminated. • Condition 2.1.1 – authorises the discharge of stormwater to land from the soak well. • Conditions L3.1.1 to 3.2.1 – requirement to carry out monthly monitoring of the quality of water discharged to the stormwater retention basis. The suite of parameters to be tested is based on the materials and products held on site. • Condition 3.3.1 – requirement to monitor the total monthly quantity of raw materials received and products despatched to allow the water quality monitoring results to be compared to throughput data. 	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<ul style="list-style-type: none"> Conditions 4.1.1 and 4.1.2 require the Licensee to install at least one dedicated groundwater monitoring well down hydraulic gradient of the soak well and bio-retention basins in the direction of groundwater flow. The bore will be used to monitor shallow groundwater quality and check for any impact from the bio-retention basins and soak well. Once completed, groundwater monitoring requirements may be added to the licence. <p><u>Residual Risk</u> Consequence: Moderate Likelihood: Possible Risk Rating: Moderate</p>	
Odour	N/A	<p>Operation Emission: Some of the products generate an ammonia odour (MAP and urea). Impact: Nuisance for nearby residents (closest are approximately 1.5 km away). Controls: All products are stored and blended inside the shed. Separation distance.</p> <p><u>Risk Assessment</u> Consequence: Insignificant Likelihood: Rare Risk Rating: Low</p> <p><u>Regulatory Controls</u> The assessed risk is low. No specific regulatory controls are required. The premises will be subject to the general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><u>Residual Risk</u> Consequence: Insignificant Likelihood: Rare Risk Rating: Low</p>	<i>Environmental Protection Act 1986</i>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Noise	N/A	<p>Operation <i>Emission:</i> Noise from truck movements to and from shed including reversing alarms and general 24/7 operation of the plant; front-end loader operations inside the shed and on the shed apron including reversing alarms; operation of blending plant inside the shed. <i>Impact:</i> Disturbance and nuisance to nearby residents (closest are approximately 3 km away). <i>Controls:</i> Separation distance. The site is in an industrial area with no nearby residential receptors; no specific controls are proposed.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> The assessed risk is low. No specific regulatory controls are required. The premises will be subject to the <i>Environmental Protection (Noise) Regulations 1997</i> and general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	<p><i>Environmental Protection (Noise) Regulations 1997</i></p> <p><i>Environmental Protection Act 1986.</i></p>
Information	L5.1.1 – L5.2.3	Conditions for information records and reporting have been included in the licence.	N/A
Licence Duration	N/A	The licence has been issued for a period of twenty years.	DER Guidance Statement: Licence Duration



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
11/01/2016	Application advertised in West Australian (or other relevant newspaper).	No comments received.	N/A
11/01/2016	Application referred to the City of Rockingham for comment.	No comments received.	N/A
11/02/2016	Application referred to Mr Noel Castle Managing Director of Castle Equipment Hire Pty Ltd for comment.	No comments received.	N/A
15/03/2016	Proponent sent a copy of the draft instrument.	No comments received.	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

Appendix A

Blending equipment schematic

