



Licence

Environmental Protection Act 1986, Part V

Proponent: Robowash Pty Ltd

Licence: L8944/2016/1

Registered office: 14 Sparks Road
HENDERSON WA 6166

ACN: 051 785 203

Premises address: Robowash
14 Sparks Road
HENDERSON WA 6166
Being Lot 560 on Diagram 73704

Issue date: Thursday 19 May 2016

Commencement date: Monday, 23 May 2016

Expiry date: Thursday, 22 May 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
61	Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated	100 tonnes or more per year	2,500 tonnes per annual period

Conditions

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

Date signed: 19 May 2016

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Stephen Checker

MANAGER LICENSING (WASTE INDUSTRIES)

Officer delegated under section 20

of the *Environmental Protection Act 1986*



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

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

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

Licence requirements

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

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

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

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

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

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



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

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

Ministerial conditions

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

Premises description and Licence summary

Robowash Pty Ltd (Robowash) operates a Robowash Wastewater Treatment System (RWTS) located in Henderson. The RWTS is designed to provide the treatment of water from Robowash parts washing machines from a variety of industrial sites. The company collects the oily water from the machines in their own trucks and transports the waste to the Premises for treatment prior to offsite discharge.

The RWTS is designed to treat the water generated from Robowash parts cleaning machines. The process consists of flocculation, oil/hydrocarbon removal, filtration and ozonation which meets the specifications for prescribed premises category 61 (liquid waste facility). The treated wastewater is then discharged to sewer under Water Corporation Trade Waste Permit 29551. The licensee has estimated a weekly throughput of 48,000 litres per week equating to a maximum of 2,500 tonnes of waste water per year. The premises will operate 2-3 days per week depending on market volumes.

Robowash currently operate another premises in Maddington which is subject to L7995/2004/3 for prescribed premises category 61; the Henderson premises will replace the Maddington facility.

The premises is predominately surrounded by other commercial and industrial premises and is located within an area zoned 'Special Use' under the City of Cockburn's *Town Planning Scheme No. 3*. The nearest residences are located over 1km to the north-east. The Environmental Protection Authority's Guidance Statement No. 3, *Separation Distances between Industrial and Sensitive Land Uses* (EPA's GS3), does not specify a recommended separation distance for category 61 premises and recommends that separation distance is considered on a case by case basis. EPA's GS3 identifies noise and odour as predominant emissions from these types of operations.

Approximately 200m to the south-east is unallocated crown land. Two unnamed lakes are located approximately 630m to the east and south-east of the Premises, with Lake Coogee located 830m to the north, and Mt Brown Lake located 2.4km south-east. Cockburn sound is located 1km to the west of the site. Bush Forever areas, as classified under the *State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region*, are located 180m south east, 780m north, and 1.5km north-east of the Premises. These areas are also classified as Environmentally Sensitive Areas under the *Environmental Protection Act 1986*.

The Department of Water's *Perth Groundwater Atlas* indicates that groundwater is found to an average depth of 11 meters below ground level with the thickness of the aquifer being approximately 31m. The *Perth Groundwater Atlas* has indicated that groundwater below the Premises is considered brackish (Total Dissolved Solids being 1000 – 1500 mg/L), has a low risk of iron staining and no known risk of Acid Sulfate Soils. Approximately 350m to the north-east is a drainage basin.



There are no direct discharges or emissions associated with this Premises. Given the proposed controls, there is a low risk of discharge of untreated wastewater to land. All liquid waste is stored within containers which are bunded and stored on sealed hardstand areas.

This Licence is for the operation of a new facility. Construction of works was undertaken prior to the submission of the works approval and licence applications. As works approvals cannot be granted retrospectively, only the licence application has been assessed and granted. The licences and works approvals issued for the Premises are:

Instrument log		
Instrument	Issued	Description
L8944/2016/1	19 May 2016	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 until 31 March in the following year;

'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

'hardstand' means a surface with a permeability of 10^{-9} metres/second or less;

'Licence' means this Licence numbered L8944/2016/1 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

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

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

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



1.2 Premises operation

1.2.1 The Licensee shall only accept waste on to the Premises if:

- (a) it is of a type listed in Table 1.2.1;
- (b) the quantity accepted is below any quantity limit listed in Table 1.2.1; and
- (c) it meets any specification listed in Table 1.2.1;

Table 1.2.1: Waste acceptance		
Waste type	Quantity Limit	Specification
Oily water	2,500 tonnes per annual period	Oily water from Robowash parts machines only.

1.2.2 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 1.2.2 and in accordance with any process limits described in that Table.

Table 1.2.2: Waste processing		
Waste type	Processes	Process limits
Oily water	Receipt, handling, storage and treatment prior to discharge to sewerage.	Oily water shall only be stored within a bunded hardstand area.
Recovered Sludge	Storage prior to removal offsite	Stored in a bunded tank prior to removal offsite.
Recovered Oil		

1.2.3 The Licensee shall immediately recover, or remove and dispose of spills of oily water, sludge or oil outside of the bunded containment infrastructure.

2 Monitoring

2.1 Monitoring of inputs and outputs

2.1.1 The Licensee shall undertake the monitoring in Table 2.1.1 according to the specifications in that table.

Table 2.1.1: Monitoring of inputs and outputs				
Input/Output	Parameter	Units	Averaging period	Frequency
Waste Inputs	Waste type as detailed in table 1.3.1	tonnes	Annual period	Each load arriving at Premises
Waste Outputs	Recovered Sludge, Recovered Oil, and any other waste types as defined in the Landfill Definitions.			Each load leaving or rejected from the Premises



3 Information

3.1 Records

- 3.1.1 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 3.1.1(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.
- 3.1.2 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.
- 3.1.3 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.

3.2 Reporting

- 3.2.1 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 3.2.1 in the format or form specified in that table.

Table 3.2.1: 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
2.1.1	Monitoring of inputs and outputs	None specified
3.1.2	Compliance	Annual Audit Compliance Report (AACR)
3.1.3	Complaints summary	None specified

Note 1: Forms are in Schedule 2



3.3 Notification

3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

Table 3.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
1.2.1	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. Part B: As soon as practicable	N1

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

Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the map below. The pink line 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 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)



Licence: L8944/2016/1
 Form: N1

Licensee: Robowash Pty Ltd
 Date of breach:

Notification of detection of the breach of a limit.

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 Robowash Pty Ltd	
Date	



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1 Purpose of this Document

This decision document explains how DER CEO delegated officer has assessed and determined the application and provides a record of the decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to the delegated officer'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
	61	2,500 tonnes per annual period
Application verified	Date: 05/01/2016	
Application fee paid	Date: 02/02/2016	
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	N/A	
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

Robowash Pty Ltd (Robowash) operates a Robowash Wastewater Treatment System (RWTS) located in Henderson. The RWTS is designed to provide the treatment of water from Robowash parts washing machines from a variety of industrial sites. The company collects the oily water from the machines in their own trucks and transports the waste to the Premises for treatment prior to offsite discharge.

The RWTS is designed to treat the water generated from Robowash parts cleaning machines. The process consists of flocculation, oil/hydrocarbon removal, filtration and ozonation which meets the specifications for prescribed premises category 61 (liquid waste facility). The treated wastewater is then discharged to sewer under Water Corporation Trade Waste Permit 29551. The licensee has estimated a weekly throughput of 48,000 litres per week equating to up to 2,500 tonnes of waste water per year. The premises will operate 2-3 days per week depending on market volumes.

Robowash currently operate another premises in Maddington which is subject to L7995/2004/3 for prescribed premises category 61; the Henderson premises will replace the Maddington facility.

The premises is predominately surrounded by other commercial and industrial premises and is located within an area zoned 'Special Use' under the City of Cockburn's *Town Planning Scheme No. 3*. The nearest residences are located over 1km to the north-east. The Environmental Protection Authority's Guidance Statement No. 3, *Separation Distances between Industrial and Sensitive Land Uses* (EPA's GS3), does not specify a recommended separation distance for category 61 premises and recommends that separation distance is considered on a case by case basis. EPA's GS3 identifies noise and odour as predominant emissions from these types of operations.

Approximately 200m to the south-east is unallocated crown land. Two unnamed lakes are located approximately 630m to the east and south-east of the Premises, with Lake Coogee located 830m to the north, and Mt Brown Lake located 2.4km south-east. Cockburn sound is located 1km to the west of the site. Bush Forever areas, as classified under the *State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region*, are located 180m south east, 780m north, and 1.5km north-east of the Premises. These areas are also classified as Environmentally Sensitive Areas under the *Environmental Protection Act 1986*.

The Department of Water's *Perth Groundwater Atlas* indicates that groundwater is found to an average depth of 11 meters below ground level with the thickness of the aquifer being approximately 31m. The *Perth Groundwater Atlas* has indicated that groundwater below the Premises is considered brackish (Total Dissolved Solids being 1000 – 1500 mg/L), has a low risk of iron staining and no known risk of Acid Sulfate Soils. Approximately 350m to the north-east is a drainage basin.

There are no direct discharges or emissions associated with this Premises. Given the proposed controls, there is a low risk of discharge of untreated wastewater to land. All liquid waste is stored within containers which are stored on a sealed and bunded hardstand.

This Licence is for the operation of a new facility. Construction of works was undertaken prior to the submission of the works approval and licence applications. As works approvals cannot be granted retrospectively, only the licence application has been assessed and granted.



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
Premises operation	L1.2.1 – L1.2.3	<p>Condition 1.2.1 and Table 1.2.1 limits the waste types and quantities that can be accepted at the premises to those that have been assessed under the licence application as suitable given the infrastructure and control measures at the premises.</p> <p>Condition 1.2.2 and Table 1.2.2 limit the waste processing that can occur to those assessed under the licence application as suitable given the infrastructure and control measures at the premises and relevant to the licence categories applied for by the proponent.</p> <p><u>Emission Description</u> <i>Emission:</i> Oily waste water discharged to land during a spill <i>Impact:</i> Migration to local surface water (Lakes located 630m from Premises) or groundwater impacting the ecology of the area. Bush Forever areas located nearby with the closest being located 180m south east. <i>Controls:</i> The wastewater treatment system consists of enclosed tanks, within bunded hardstands. The wastewater treatment system contains a number of alarms to alert the operator if there is an issue with the system that needs to be attended to. Any issues occurring with the system trigger the shutdown of the machine.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p>	Application supporting documentation



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Premises operation continued		<p><u>Regulatory Controls</u> Condition 1.2.3 requires the licensee to immediately recover or remove and dispose of spills of oily water, sludge or oil.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p>	
Fugitive emissions	N/A	<p>No fugitive (dust) emissions are expected from the operations.</p> <p>Any dust emissions will be subject to the provisions under s49 of the <i>Environmental Protection Act 1986</i>.</p>	Application supporting documentation
Odour	N/A	<p><u>Emission Description</u> <i>Emission:</i> Odour emanating from the liquid waste brought to and from the premises. <i>Impact:</i> Migration of odour to neighbouring light industry located on boundary of Premises. <i>Controls:</i> The wastewater treatment system consists of enclosed tanks, within the final product being pumped to sewer. The wastewater treatment system contains a number of alarms to alert the operator if there is an issue with the system that needs to be attended to. Any issues occurring with the system trigger the shutdown of the machine.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u></p>	Application supporting documentation



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>Odour conditions have not been included in the licence in accordance with Departmental reform as published on DER's website under 'Administrative changes implemented within the Department of Environment Regulation' www.der.wa.gov.au. Odour emissions can be sufficiently regulated under section 49 of the <i>Environmental Protection Act 1986</i></p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	
Noise	N/A	<p><u>Emission Description</u> <i>Emission:</i> Noise emanating from the treatment system in operation. Vehicle and Machinery movements around the premises. <i>Impact:</i> Migration of noise to neighbouring light industry located on boundary of Premises. <i>Controls:</i> The wastewater treatment system consists of enclosed tanks, located inside factory workshops.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Any noise emissions will be subject to the provisions of the <i>Environmental Protection (Noise) Regulations 1997</i>.</p>	Application supporting documentation



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low	
Monitoring of inputs and outputs	L2.1.1	Condition 2.1.1 and Table 2.1.1 requires monitoring of inputs and outputs to monitor compliance with condition 1.3.1	N/A
Information Information continued	L3.1.1 – L3.1.4, L3.2.1 and L3.3.1	<p>Condition 3.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years which assists DER in regulating the conditions of this licence.</p> <p>Condition 3.1.2 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR). This condition assists DER in regulating the occupier's compliance with licence conditions and allows an opportunity for DER to review the occupier's environmental performance.</p> <p>Condition 3.1.3 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. DER will review these complaints as reported in the Annual Environmental Report (AER) and can consider the requirement for reassessment of any regulatory controls to address the complaints.</p> <p>Condition 3.2.1 requires the licensee to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition 3.1.3. The AER is also required to provide the results for the monitoring of inputs/outputs, and a summary of malfunction of pollution control equipment or any environmental incidents. DER reviews all of the data provided in the AER to assess compliance with the licence conditions.</p>	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration		Development Approval DA16/0155 was conditionally approved by the City of Cockburn on 11 May 2016 for the premises. There is no expiry date on the approval and therefore the licence will be issued for a duration of 20 years in accordance with DER's Guidance Statement: Licence duration (November 2014).	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
08/02/2016	Application advertised in West Australian (or other relevant newspaper)	No comments received.	N/A
11/03/2016	Proponent sent a copy of 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