

WESTERN AUSTRALIA

DEPARTMENT OF ENVIRONMENT REGULATION

Environmental Protection Act 1986

LICENCE

LICENCE NUMBER: L4498/1986/15

FILE NUMBER: DER2013/000737

NAME AND ADDRESS OF OCCUPIER:

Hexion Australia Pty Ltd
210 Moore Road
DARDANUP WEST WA 6236
A.C.N 009 111 264

NAME AND LOCATION OF PREMISES:

Hexion Australia Pty Ltd
Lot 7 on Diagram 64331, Moore Road
DARDANUP WEST WA 6236
(as depicted in Attachment 1)

Environmental Protection Regulations 1987

CLASSIFICATION(S) OF PREMISES:

Category 31: Chemical manufacturing

COMMENCEMENT DATE OF LICENCE:

Friday, 25 September 2015

EXPIRY DATE OF LICENCE:

Saturday, 24 September 2016

CONDITIONS OF LICENCE:

As described and attached:

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CONTROLLED WASTE CONTROL CONDITION(S) 1

SOLID WASTE CONTROL CONDITION(S) 3

ATTACHMENT(S) 2

Date signed: 24 September 2015

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

Date of Issue: Thursday, 24 September 2015

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PREAMBLE

Applicability

This licence is issued to Hexion Australia Pty Ltd located at Lot 7 on Diagram 64331, Moore Road, Dardanup West as depicted in Attachment 1. This is a prescribed premises within Schedule 1 of the *Environmental Protection Regulations 1987* as outlined in Table 1.

Table 1: Categories under which Hexion Australia Pty Ltd is prescribed.

Category number	Category name	Description
31	Chemical manufacturing	Premises (other than Premises within category 32) on which chemical products are manufactured by a chemical process.

The nominal rated throughput covered by this licence is in accordance with the following:

- Urea-formaldehyde resin produced 46,200 tonnes per annum
- Hydroxamated polyacrylamide 4,400 tonnes per annum
- Formaldehyde production 10,000 tonnes per annum
- Other chemical production 1,000 tonnes per annum

CONDITIONS OF LICENCE

DEFINITIONS

In these conditions of licence, unless inconsistent with the text or subject matter:

“Air Emission Stack” means the stack attached to the formaldehyde plant as depicted in Attachment 1;

“AS” means Australian Standard;

“AS1657” means the relevant part and most recent version of Australian Standard 1657: Fixed platforms, stairways and ladders- Design, Construction and Installation;

“AS1940” means the relevant part and most recent version of Australian Standard 1940: Storage and handling of flammable and combustible liquids;

“AS3780” means the relevant part and most recent version of Australian Standard 3780: storage and handling of corrosive substances;

“AS4323” means the relevant part and most recent version of Australian Standard 4323: Stationary source emissions - selection of sampling positions;

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

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

“licensed controlled waste contractor” means a contractor licensed under the *Environmental Protection (Controlled Waste) Regulations 2004*;

“CEO” means Chief Executive Officer of the Department of Environment Regulation;

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“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

“licensee” means Hexion Australia Pty Ltd;

“m AHD” means metres Australian Height Datum;

“mgL⁻¹” mean milligrams per litre;

“NATA” means 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 Lot 7 on Diagram 64331, Moore Road, Dardanup West, as depicted in Attachment 1;

“quarterly” means the 4 inclusive periods from 1 March to 31 May, 1 June to 30 August, 1 September to 30 November and 1 December to 28 February in the following year;

“USEPA” means United States (of America) Environmental Protection Agency; and

“US EPA Method 18” means the promulgated Test Method 18 - Measurement of gaseous organic compound emissions by gas chromatography.

REPORTING CONDITIONS

REPORTING OF INCIDENTS

- 1 The licensee shall maintain a permanent record of any measurement which indicates that any limit specified in these conditions of licence has been exceeded.
- 2 The recorded information required by condition 1 shall include:
 - (i) the date, time, and probable reason for the incident;
 - (ii) an estimate of the period over which the incident was or is likely to be in effect;
 - (iii) the potential or known environmental consequences of the incident, and the extent of these;
 - (iv) corrective action taken or planned to mitigate any adverse environmental consequences; and
 - (v) corrective action taken or planned to prevent reoccurrence of the incident.
- 3 This record required by condition 1 shall be retained on site and be made available to the CEO upon request.

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REPORTING REQUIREMENTS

- 4 The licensee shall provide to the CEO a copy of the Annual Environmental Report. This report shall contain data collected from **1 July to 30 June each year** and shall be provided prior to **30 September each year**. Two copies of the report (one electronic) shall be forwarded to the Department of Environment Regulation and shall contain:
- (i) a brief background on the approval of the project and an overview of the project and its processes, a current plan of the premises and a table showing quantities of raw materials used and the quality and quantity of wastes produced;
 - (ii) the monitoring data and other collected data required by any condition of this licence for the described period;
 - (iii) a discussion of the results of any monitoring programmes against background data, guidelines and / or limits set in the licence (data should be provided in tables and significant results should be presented in a graphical format);
 - (iv) a summary of incident and exceedance reports and discussion of any significant responses taken to minimise the likelihood of reoccurrence; and
 - (v) a discussion of the operation of the project, compliance with conditions and its environmental performance to date.
- 5 The licensee shall by **30 September** in each year, provide to the CEO an Annual Audit Compliance Report in the form in Attachment 2 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the premises, during the period beginning **1 July** the previous year and ending on **30 June** in that year.

AIR POLLUTION CONTROL CONDITIONS

VOLATILE / SOLVENT STORAGE AND HANDLING

- 6 The licensee shall prevent the uncontrolled discharge of vapours generated from all storage and materials handling operations into the environment through the use of tank breathers.
- 7 The licensee shall transfer all volatile organic compounds (solvents) in a closed pumping system.

AUTHORISED DISCHARGE POINTS

- 8 The licensee shall direct exhaust gases from the HX PAM emulsion plant through a scrubber system before being discharged to the environment through a chimney stack at least 10 metres above ground level.
- 9 The licensee shall direct exhaust gases from the formaldehyde plant through absorber towers before being discharged to the environment through a chimney stack at least 21 metres above ground level.

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STACKSAMPLINGPORTS, PLATFORMS AND ACCESSWAYS

- 10 The licensee shall maintain emission sampling ports on the Air Emission Stack in accordance with AS4323.
- 11 The licensee shall incorporate and maintain platforms and access ways on the Air Emission Stack subject to emissions monitoring requirements in accordance with AS1657.

STACK MONITORING AND EMISSION LIMIT

- 12 The licensee shall undertake the monitoring in Table 4 according to the specifications in that table.

Table 4: Stack Monitoring Sites

Source	Frequency	Analyte	Method
Air Emission Stack	Annual	Formaldehyde	US EPA Method 18

- 13 The licensee shall submit the collected gas to a laboratory with current NATA accreditation for the analyte specified, and have the samples analysed in accordance with the current US EPA Method.
- 14 The licensee shall provide the following information together with the results of each set of source tests:
 - (i) plant production feed rate relevant to the emissions at the time of the test;
 - (ii) in stack moisture content;
 - (iii) in stack volume flow rate;
 - (iv) in stack temperature;
 - (v) analytes, according to the Table 4, with mass emission expressed in grams per minute;
 - (vi) a statement of compliance with the test method;
 - (vii) any other information relevant to the test results; and
 - (viii) an assessment of the likelihood of the highest short term or annual average ground level concentrations of these emissions causing acute or chronic adverse health effects for the maximally exposed individual.

WATER POLLUTION CONTROL CONDITIONS

WASTEWATER MANAGEMENT

- 15 The licensee shall direct all wastewater from the process and contaminated stormwater into the wastewater treatment plant and process waste basin as depicted in Attachment 1.
- 16 The licensee shall reuse water from the wastewater treatment plant and process waste basin as plant process water or remove the contaminated water from site by a licensed controlled waste contractor.

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STORMWATER MANAGEMENT

- 17 The licensee shall direct uncontaminated stormwater from the site to the stormwater basin (Attachment 1).

LIQUID CHEMICAL STORAGE

- 18 The licensee shall store and handle flammable, combustible liquids, such as hydrocarbons, and corrosives where the total volume of each substance stored on the premises exceeds 250 litres, in accordance with AS1940 or AS3780 as appropriate.
- 19 The licensee shall immediately recover, or remove and dispose of, any liquid resulting from spills or leaks of chemicals including fuel, oil or other hydrocarbons, whether inside or outside the low permeability compound(s).

WATER MONITORING PROGRAMME AND REPORTING

- 20 The licensee shall:
- (i) maintain the monitoring facilities at the locations depicted in Attachment 1 and described in Table 5, and;
 - (ii) implement the monitoring programme specified in Table 5.

Table 5: Water Monitoring Programme

Monitoring locations	Sampling Frequency ¹	Parameters to be measured	Reporting Unit
Monitoring Bores MW1, MW2, MW3, MW4, MW5, MW6	Quarterly	pH total dissolved solids depth to water total hydrocarbons	No unit mgL ⁻¹ m AHD mgL ⁻¹

Note 1: Monitoring shall be undertaken at least 45 days apart.

- 21 The licensee shall collect all water samples in accordance AS/NZS 5667.1 and AS/NZS 5667.11.
- 22 The licensee shall ensure all water samples are submitted to a laboratory with current NATA accreditation for the parameters being measured.

CONTROLLED WASTE CONTROL CONDITIONS

WASTE MANAGEMENT

- 23 The licensee shall ensure that all waste generated on site is either reused in the process or made available for off-site disposal by a licensed controlled waste contractor.

SOLID WASTE CONTROL CONDITIONS

DISPOSAL OF WASTE PRODUCTS

- 24 The licensee shall ensure that all solid waste generated on site is either reused in the process or made available for off-site disposal to a licensed facility.

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- 25 The licensee shall ensure that waste sludge derived from the production, formulation or use of resins, glues or adhesives is contained within sealed compounds.
- 26 The licensee shall ensure that the waste referred to in condition 26 is disposed of off-site to a licensed facility.

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

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ATTACHMENT 1 – PLAN OF PREMISES
Lot 7 on Diagram 64331



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ATTACHMENT 2 – ANNUAL AUDIT COMPLIANCE REPORT

SECTION A

LICENCE DETAILS

Licence Number: L4498/1986/15	Licence File Number: DER2013/000737
Company Name: Trading as:	ACN:
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of 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

INITIAL: _____

WESTERN AUSTRALIA

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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 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 annual audit compliance report

INITIAL: _____

WESTERN AUSTRALIA

DEPARTMENT OF ENVIRONMENT REGULATION

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SECTION C - SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report may only be signed by a person(s) with legal authority to sign it. The ways in which the Annual Audit Compliance Report 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 Annual Audit Compliance Report 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"/>	by affixing the common seal of the licensee in accordance with the Corporations Act 2001; 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"/>	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: Hexion Australia Pty Ltd

Licence: L4498/1986/15

Registered office: 210 Moore Road
DARDANUP WA 6236

ACN: 009 111 264

Premises address: Hexion Australia Pty Ltd
210 Moore Road
DARDANUP WEST WA 6236
Being Lot 7 on Diagram 64331

Issue date: Thursday, 24 September 2015

Commencement date: Friday, 25 September 2015

Expiry date: Saturday, 24 September 2016

Decision

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

Decision Document prepared by: Terrel MacGregor
Licensing Officer

Decision Document authorised by: Jonathan Bailes
Delegated Officer



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1 Purpose of this Document

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



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	31	106,590 tonnes per annual period
Application verified	Date: 17/08/2015	
Application fee paid	Date: 20/08/2015	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> A wetland located next to the premises (intersecting the premises boundary) and nearby wetlands are subject to the provisions of the <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> (Swan Coastal Plain Lakes EPP).		
Is the Premises subject to any EPP requirements? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> The Swan Coastal Plain Lakes EPP requires that wetlands' integrity, functions and environmental values are maintained.		



3 Executive summary of proposal and assessment

Hexion Australia Pty Ltd (Hexion) manufactures a range of chemicals for use in the timber industry and the alumina industry. The products manufactured consist primarily of liquid urea-formaldehyde (UF) resin, liquid melamine-urea-formaldehyde (MUF) resin, formaldehyde (FA) and hydroxamated polyacrylamide (HX-PAM) emulsion. Hexion also toll manufactures small amounts of chemicals for other customers. The activities undertaken on the premises include the following:

- formaldehyde (FA) manufacture;
- urea formaldehyde(UF) resin manufacture; and
- hydroxamated polyacrylamide (HX-PAM) emulsion manufacture.

Raw Materials

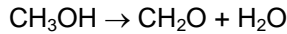
Methanol – CH₃OH

Formaldehyde – CH₂O

Urea – CO(NH)₂

FA Production

Formed from the catalytic oxidation and dehydrogenation of methanol.



The catalyst is silver. The off gases are used as a supplementary fuel.

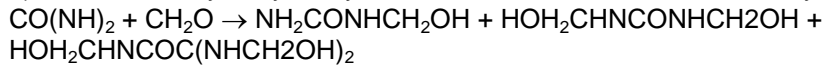
The process generates the following emissions:

Air Emissions	Water Emissions	Land Emissions
Hydrogen	-	-
Oxides of Carbon		
Formaldehyde		
Methanol		

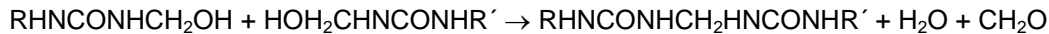
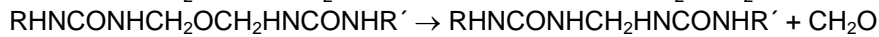
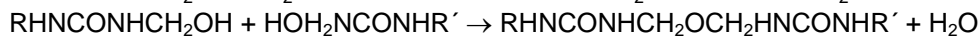
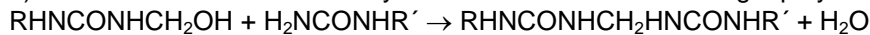
Liquid UF Resin Production

Synthesised from condensation of urea and formaldehyde in a basic aqueous solution in a 2 stage process:

1) urea is hydroxymethylolated to form mono-, di-, and trimethylolurea



2) condensation of the methylolureas to low molecular weight polymers



The process generates the following:

Air Emissions	Water Emissions	Land Emissions
Formaldehyde	-	-

The processing site is located in Dardanup West, approximately 185 kilometres (km) south of Perth and 9 km south east of Bunbury. The site is zoned Noxious and Hazardous Industry under the Shire of Dardanup Town Planning Scheme Number 3. General industry surrounds the premises, with residential premises approximately 1,300 km south.

A resource enhancement wetland intersects the premises boundary in the south eastern corner. A number of multiple use wetlands are within 400 meters (m) of the premises boundary. The Preston River is 1.3 km west of the site. Groundwater flows in a northwest direction.

The synthetic resin produced is pumped via a pipeline, or trucked, to the adjacent Laminex (TLG) plant for use in particle board. Other products are trucked off site in tankers, isotainers or intermediate bulk containers (IBC's). End products from the Hexion site include panel board



resins, paper overlay (treater) resins, wood specialty adhesives, industrial resins and pesticide treatment.

Air emissions generated from processes on site include carbon monoxide, formaldehyde and methanol. Wastewater generated from the production process is directed into the process water pit and tanks. The wastewater is treated in a wastewater treatment system and reused in the plant processes. Stormwater from the large dam is treated and reused as a substitute raw water source.

This licence is the successor to licence L4498/1986/14 and continues to authorise chemical manufacturing. The licence incorporates the change in company name from Momentive Specialty Chemicals Pty Ltd to Hexion Australia Pty Ltd.

As a part of this re-issue DER has not reassessed the acceptability or impacts of emissions and discharges from the premises or revisited any existing emission control levels with the exception of fugitive dust emissions.



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
Fugitive emissions	N/A	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Dust from site operations. <i>Impact:</i> Reduced local air quality and nuisance for neighbouring properties. Closest residential dwelling is approximately 1,300 m south of the premises boundary. <i>Controls:</i> The majority of the site is sealed with bitumen. Construction of the urea silo and melamine handling system minimises dust generation.</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> No regulatory controls required. The fugitive dust management condition has been removed from the licence. The general provisions of the <i>Environmental Protection Act 1986</i> apply.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Residual Risk Rating:</i> Low</p>	General provisions of the <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
Licence Duration	N/A	An inspection of the premises in 2013 identified issues with the separation of contaminated and uncontaminated stormwater and insufficient freeboard in the basins. As a result of concerns with wastewater and stormwater management on site, DER considers it appropriate to issue a short term licence. This will allow time to reassess the stormwater management onsite and identify the any further requirements specific to the premises operation.	N/A



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
31/08/2015	Application advertised in West Australian (or other relevant newspaper)	No comments received	N/A
21/09/2015	Proponent sent a copy of draft instrument	Minor administrative changes, location of bores and sampling frequency in Table 5	Changes made as per comments

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