



Government of Western Australia  
Department of Environment Regulation

Your ref L8770/2013/1  
Our ref 2013/003735-1  
Enquiries Luke Claessen  
Phone 08 9333 7487  
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Mr Rory McGuire  
Environex International Pty Ltd  
19 Motivation Drive  
Wangara WA 6065

Dear Mr McGuire

**ENVIRONMENTAL PROTECTION ACT 1986: LICENCE GRANTED**

**Premises**

**Environex International Pty Ltd  
Part of Lot 310 on Plan 28561, 19 Motivation Drive  
Wangara WA 6065  
Licence Number: L8770/2013/1**

A licence under the *Environmental Protection Act 1986* (the Act) has been granted for the above premises. The Department of Environment Regulation will advertise the issuing of this licence in the public notices section of *The West Australian* newspaper. The licence includes attached conditions. Under section 58(1) of the Act, it is an offence to contravene a condition of a licence. This offence carries a penalty of up to \$125,000 and a daily penalty of up to \$25,000.

In accordance with section 102(1)(c) of the Act, you have 21 days to appeal the conditions of the licence. Under section 102(3)(a) of the Act, any other person may also appeal the conditions of the licence. To lodge an appeal, contact the Office of the Appeals Convenor on 6467 5190 or by email at [admin@appealsconvenor.wa.gov.au](mailto:admin@appealsconvenor.wa.gov.au).

Where a licence is issued for more than one year it requires payment of an annual fee and will cease to have effect if the fee is unpaid. It is the occupier's responsibility to lodge a fee application and pay the annual fee in sufficient time to avoid incurring a late payment fee and for processing to be completed before the licence anniversary date.

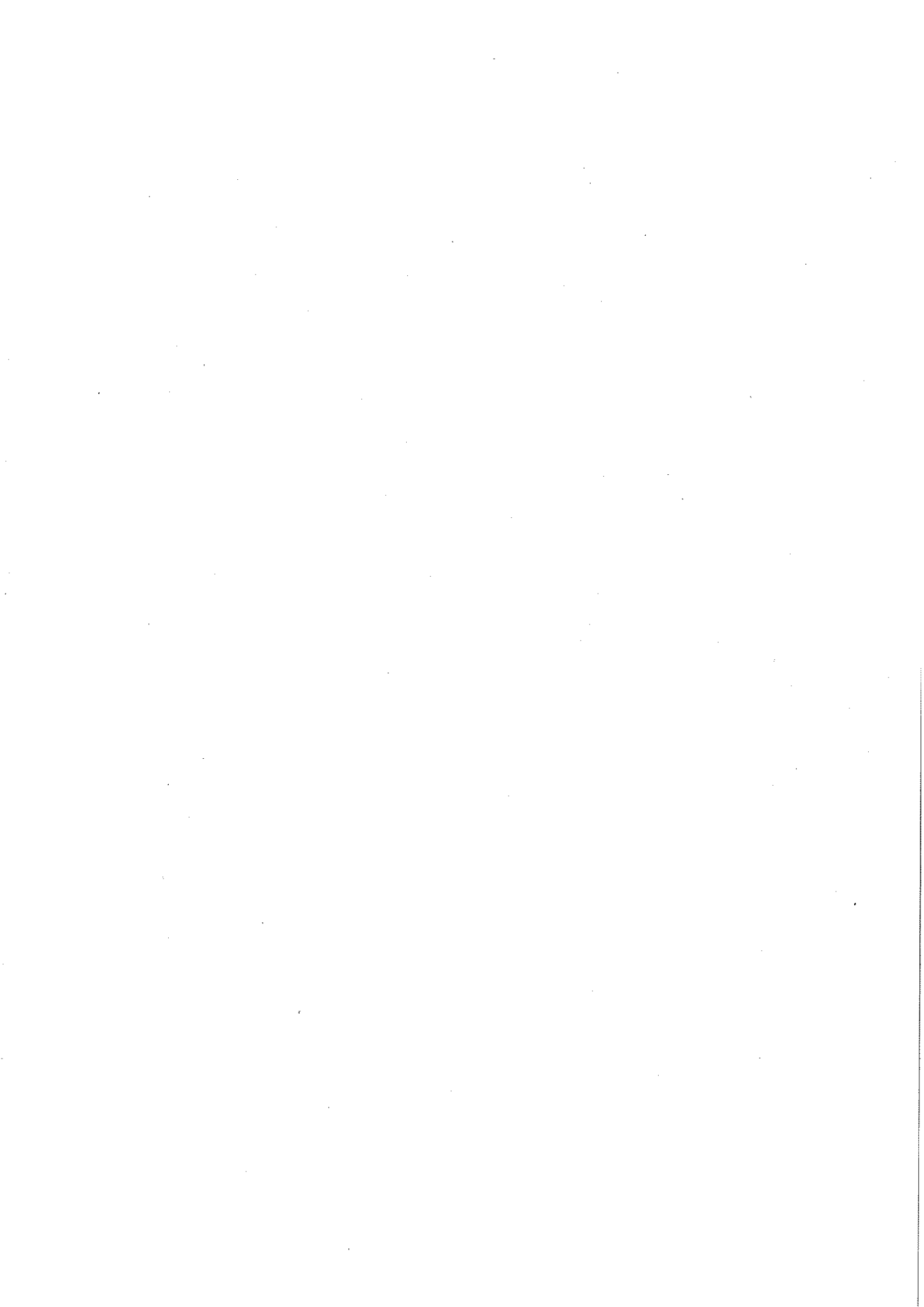
If you have any queries regarding the above information, please contact Luke Claessen on 9333 7487.

Yours sincerely

Mark Whiteley  
Officer delegated under section 20  
of the *Environmental Protection Act 1986*

5 September 2013

The Atrium, 168 St Georges Terrace, Perth WA 6000  
Phone (08) 6467 5000 Fax (08) 6467 5562  
Postal Address: Locked Bag 33, Cloisters Square, Perth WA 6850  
[www.der.wa.gov.au](http://www.der.wa.gov.au)





# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee: Environex International Pty Ltd**

**Licence: L8770/2013/1**

**Registered office:** 19 Motivation Drive  
Wangara WA 6065

**ACN:** 159 887 117

**Premises address:** Environex International Pty Ltd  
Part of Lot 310 on Plan 28561 Motivation Drive  
Wangara WA 6065

**Issue date:** Friday, 6 September 2013

**Commencement date:** Friday, 6 September 2013


**Expiry date:** Wednesday, 5 September 2018

**Prescribed Premises Category**  
Schedule 1 of the Environmental Protection Regulations 1987

Category number	Category description	Category production or design capacity	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 to the environment.	500 tonnes or more per year	10,000 tonnes per year

### Conditions of Licence

Subject to the conditions of licence set out in the attached pages.

  
.....  
Mark Whiteley  
Officer delegated under Section 20  
of the *Environmental Protection Act 1986*





## Contents

Licence	i
Contents	ii
Introduction	ii
Licence conditions	4
1 General	4
2 Emissions	5
3 Monitoring	6
4 Improvements	6
5 Information	7
Schedule 1: Maps	8
Schedule 2: Reporting & notification forms	10

## Introduction

This Introduction is not part of the Licence conditions.

### Who we are

The Department of Environment Regulation (DER) is a Government Department in the portfolio of the Minister for the Environment. Our purpose is to protect and conserve the State's environment on behalf of the people of Western Australia.

### Our industry licensing role

DER has responsibilities under Part V of the *Environmental Protection Act 1986* for the licensing of prescribed premises. We also monitor and audit compliance with works approvals and licence conditions, take enforcement action as appropriate and develop and implement licensing and industry regulation policy.

### Licence requirements

This licence is issued under Part V of the *Environmental Protection Act 1986*. Conditions contained with the licence relate to the prevention, reduction or control of emissions and discharges 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 *Environmental Protection Act 1986* and any other statutory instrument. These 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. Additional guidance on pollution prevention can be found in the Department of Water's Water Quality Protection Notices accessed through:  
<http://www.water.wa.gov.au/Managing+water/Water+quality/Water+quality+protection+guidelines/default.aspx>





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. Operating without a licence is an offence under the Act.

**Ministerial conditions**

If your Premises has been assessed under Part IV of the *Environmental Protection Act 1986* you may have had conditions imposed by the Minister for the Environment. You are required to comply with any conditions imposed by the Minister.

**Premises description and Licence summary**

Environex International Pty Ltd (Environex) is a new company that has been formed to take over a part of the operations formerly operated by Klen International (74) Pty Ltd (Klen) at the premises located 19 Motivation Drive, Wangara.

Environex is engaged in the manufacture of formulated cleaning and sanitation chemicals for the food and hospitality industries, as well as sealers for porous stone, bulk acid and alkali decants and the manufacture of aqueous ammonia. The new structure will see Klen continue with the manufacture of fire assay fluxes (and associated products) side of the operations, while Environex takes over the operations as described above. Klen will continue to operate at the Motivation Drive site until a purpose-built facility is completed at Neerabup - to which they will then relocate.

This new licence is for the operation of an existing facility that was operated by Klen under licence L5848/1991/11. The location is within the City of Wanneroo and is zoned 'General Industrial'. The premises has the Seacrest Homes building products business on the west (adjoining) and north west and north east corners, with a glazing/glass business as the rear (north) adjoining neighbour. The eastern border is shared with Affordable Living Homes offices.

The potential emissions from the site include; volatile organic compounds (VOCs - from adhesive blending operations), ammonia gas (from aqueous ammonia production/tank venting), contaminated stormwater discharges and liquid wastes from chemical processes. The management of liquid wastes and contaminated stormwater are via an on-site wastewater treatment plant and by licensed (by WaterCorp) discharge to sewer. Potential discharges to air are managed through an acidic scrubbing process (for the ammonia production) and direct discharge to atmosphere via stack for the VOCs. Environex store significant volumes of Dangerous Goods and environmental hazardous chemicals on site. These dangerous goods are subject to the *Dangerous Goods Safety Act 2004* and associated regulations and Environex have been granted a licence DG8021709 under this Act. The premises has an existing industrial waste permit issued by the Water Corporation for discharges of compliant site-generated effluents to sewer.

Instrument log		
Instrument	Issued	Description
L8770/2013/1	06/09/2013	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 Act apply unless the contrary intention appears.

1.1.2 In the Licence, unless the contrary intention appears:

“the Act” means the *Environmental Protection Act 1986*;

“annual” means the inclusive period from 1 January until 31 December in each year;

“Code of Practice for the Storage and handling of dangerous goods” means the Storage and handling of dangerous goods, Code of Practice, Department of Mines and Petroleum, Government of Western Australia;

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

“Director” means Director, Environmental Regulation Division of the Department of Environment Regulation for and on behalf of the Chief Executive Officer as delegated under Section 20 of the *Environmental Protection Act 1986*;

“Director” for the purpose of correspondence means;  
Regional Leader, Industry Regulation, Swan Region  
Department of Environment Regulation  
Locked Bag 33  
Cloisters Square WA 6850  
Telephone: (08) 9333 7510  
Facsimile: (08) 9333 7550

“environmentally hazardous material” means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm;

“fugitive emissions” means all emissions not arising from point sources identified in Sections 2.3;

“Licence” means this Licence numbered L8770/2013/1 and issued under the *Environmental Protection Act 1986*;

“Licensee” means the person or organisation named as Licensee on page i of the Licence;

“placard quantity” has the meaning defined in the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007;

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

“waste” has the meaning defined in the *Environmental Protection Act 1986*;



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

1.1.4 Any reference to a Guideline or Code of Practice in the Licence means the current version of the Guideline or Code of Practice

**1.2 General conditions**

1.2.1 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.

1.2.2 The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.

1.2.3 The Licensee, except where storage is prescribed in section 1.3, shall only store substances that are classed as dangerous goods below placard quantities or environmentally hazardous materials not classified as dangerous goods if they are stored in accordance with the Code of Practice for the Storage and handling of dangerous goods.

1.2.4 The Licensee shall immediately recover, or remove and dispose of spills or leaks of environmentally hazardous materials outside of an engineered containment system.

1.2.5 The Licensee shall:

- (a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and
- (b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.<sup>1</sup>

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

**1.3 Premises operation**

1.3.1 The Licensee shall cease operations of the aqueous ammonia plant if temperatures in the reaction tank exceed 40 degrees Celsius.

1.3.2 The Licensee shall only recommence operations after a shutdown in condition 1.3.1 when the reaction tank temperature can be consistently maintained below 40 degrees Celsius.

**2 Emissions**

**2.1 General**

2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit, and/or target in this section.

**2.2 Point source emissions to air**

There are no specified conditions relating to point source emissions to air in this section.

**2.3 Point source emissions to surface waters and groundwater**





There are no specified conditions relating to point source emissions to surface waters and groundwater in this section.

#### 2.4 Emissions to land

There are no specified conditions relating to emissions to land in this section.

#### 2.5 Fugitive emissions

2.5.1 The Licensee shall ensure that no visible dust generated by the activities of the Premises crosses the boundary of the Premises.

#### 2.6 Odour

2.6.1 The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.

### 3 Monitoring

#### 3.1 Monitoring of point source emissions to air

There are no specified conditions relating to monitoring of point source emissions to air in this section.

### 4 Improvements

#### 4.1 Improvement programme

4.1.1 The Licensee shall complete the improvements in Table 4.1.1 by the dates specified.

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

<b>Improvement reference</b>	<b>Improvement</b>	<b>Date of completion</b>
IR1	The Licensee shall submit to the Director a report that assesses the sources, compositions and quantities of emissions to air at the Premises and compares them against industry standards for preventing or abating pollution or environmental harm (where available). Where the design, operation and emission levels at the Premises do not conform to industry standards for preventing or abating pollution or environmental harm, the report shall contain an improvement timetable to achieve these industry standards.	30/11/2013
IR2	The Licensee shall submit to the Director a report on all existing tanks holding dangerous goods or environmentally hazardous materials, identifying whether they are compliant with the standards in Condition 1.2.3 for new tanks. The report will include a list of actions for each non-compliant tank required to meet these requirements.	30/11/2013
IR3	The Licensee shall submit to the Director a report detailing a program of improvements to bring those non-compliant tanks identified in the response to IR2. These improvements should ensure those tanks are brought up to the standards in Condition 1.2.3 based on the environmental risk from each tank.	30/11/2013





## 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 groundwater.

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 year.

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 Director at the Contact Address an annual environmental report within 28 calendar days after of 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.

Condition or table (if relevant)	Parameter	Format or form <sup>1</sup>
-	Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the year and any action taken	None specified
5.1.3	Compliance	AACR
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

### 5.3 Notification

5.3.1 The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the Director in accordance with the notification requirements of the table.

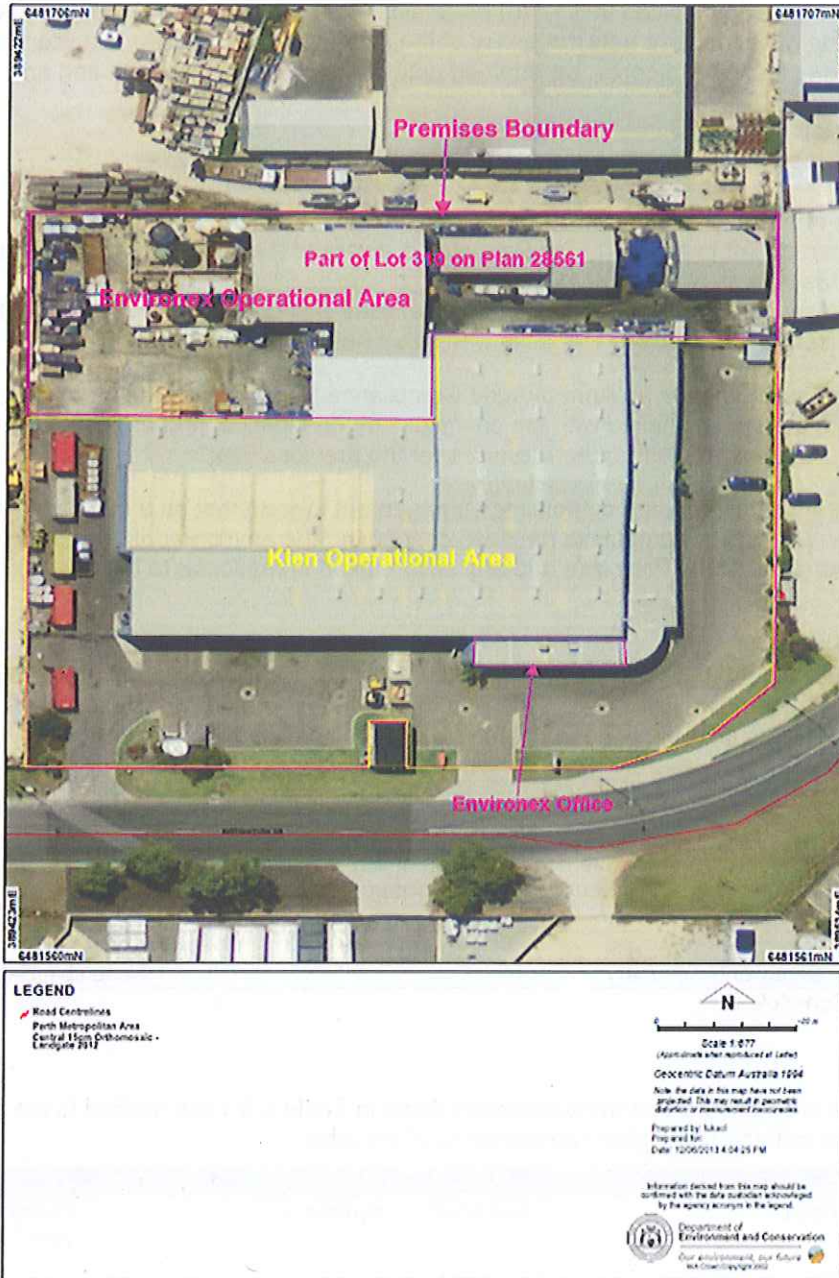
Condition or table (if relevant)	Parameter	Notification requirement <sup>1</sup>	Format or form <sup>2</sup>
-	Any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution	Part A: As soon as practicable, but no later than 5pm of the next usual working day.  Part B: As soon as practicable	N1



Schedule 1: Maps

**Attachment 1: Premises map**

The Premises is shown in the map below. The pink line depicts the Premises boundary but it is defined in Table 1.2.1 which should prevail if any discrepancy exists.









## 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.

Copies of the original monitoring reports must also be submitted.

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Licence: L8770/2013/1  
Licensee: Environex International Pty Ltd  
Form: AACR Period :  
Name: Annual audit compliance report

### Annual audit compliance report

#### Section A: Statement of compliance with Licence conditions

Were all conditions of licence complied with within the reporting period?	
Yes	<input type="checkbox"/> Initial Sections A & B, then proceed to Section C
No	<input type="checkbox"/> Initial Section A, then 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**

a) Licence condition not complied with?	
b) Date(s) b) Date(s) and time(s) the non compliance occurred, if applicable?	
c) Was this non compliance reported to DER?	
<input type="checkbox"/> Yes, and  <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	

Please use a separate page for each Licence condition that was not complied with. Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



**Section C: Signature and certification**

This AACR may only be signed by a person(s) with legal authority to sign it as defined 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 AACR 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 (CEO) of DER to sign on the Licensee's behalf.
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 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 CEO of DER.
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 CEO of DER.
a local government	<input type="checkbox"/>  <input type="checkbox"/>	by the CEO 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 AACR is correct and not false or misleading in a material particular.

Signature:

Name: (printed)

Position:

Date:

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Signature:

Name: (printed)

Position:

Date:

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Seal (if signing under seal)





Licence: L8770/2013/1  
Form: N1

Licensee: Environex International Pty Ltd  
Date of breach:

**Notification of detection of the breach of a limit or any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution.**

These pages outline the information that the operator must provide.  
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

**Part A**

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

<b>Notification requirements for the breach of a limit</b>	
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	

<b>Notification requirements for any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution</b>	
Date and time of event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken , or intended to be taken, to stop any emission	
Description of the failure or accident	



## 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 Environex International Pty Ltd	
Date	





# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:** Environex International Pty Ltd

**Licence:** L8770/2013/1

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**Registered office:** 19 Motivation Drive  
Wangara WA 6065

**ACN:** 159 887 117

**Premises address:** Environex International  
19 Motivation Drive  
Wangara WA 6065  
Being part of Lot 310 on Plan 628561

**Issue date:** Friday, 6 September 2013

**Commencement date:** Friday, 6 September 2013

**Expiry date:** Wednesday, 5 September 2018

### 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:

Luke Claessen  
Regional Environmental Officer

Decision Document Authorised By:

Marko Pasalich  
Regional Leader



## Contents

Decision Document	1
Contents	2
1 Purpose of this Document	2
2 Administrative Summary	3
3 Executive Summary of Proposal	4
4 Decision Table	7
5 Advertisement and Consultation Table	11
Appendix A	12

## 1 Purpose of this Document

This decision document explains how DER has assessed and determined the application for a works approval or licence, 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.

### Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

#### Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.3, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.3, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

#### Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions is justified in Section 4 of this document.

#### Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.





## 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	<table border="1"> <thead> <tr> <th>Category Number(s)</th> <th>Design Capacity</th> </tr> </thead> <tbody> <tr> <td>33</td> <td>10,000</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Category Number(s)	Design Capacity	33	10,000				
	Category Number(s)	Design Capacity							
	33	10,000							
Application Verified	Date:								
Application Fee Paid	Date:								
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 checked="" type="checkbox"/>								
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								
If Yes include details of which EPP(s) here.									
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								
If Yes, include details here, e.g. Site is subject to SO <sub>2</sub> requirements of Kwinana EPP.									



### 3 Executive Summary of Proposal

#### GENERAL COMPANY DESCRIPTION

Environex is engaged in the manufacture of formulated cleaning and sanitation chemicals for the food and hospitality industries, as well as sealers for porous stone, bulk acid and alkali decants and the manufacture of aqueous ammonia.

#### LOCATION OF PREMISES

19 Motivation Drive in Wangara is located within the City of Wanneroo and is zoned 'General Industrial'. The premises has the Seacrest Homes building products business on the west (adjoining) and north west and north east corners, with a glazing/glass business as the rear (north) adjoining neighbour. The eastern border is shared with Affordable Living Homes' offices.

#### PROCESS DESCRIPTIONS

##### Ammonia Blending System

This facility is used to convert anhydrous ammonia (a compressed gas) into ammonia solution. This facility is designed; and constructed, operated and licensed; in compliance to the requirements of the DG Act and the associated DG Regulations. Figure 1 shows the aqueous ammonia process diagram – process and storage areas are in a fully bunded area, however the bubbler unit and the anhydrous ammonia tank are not contained within the bund.

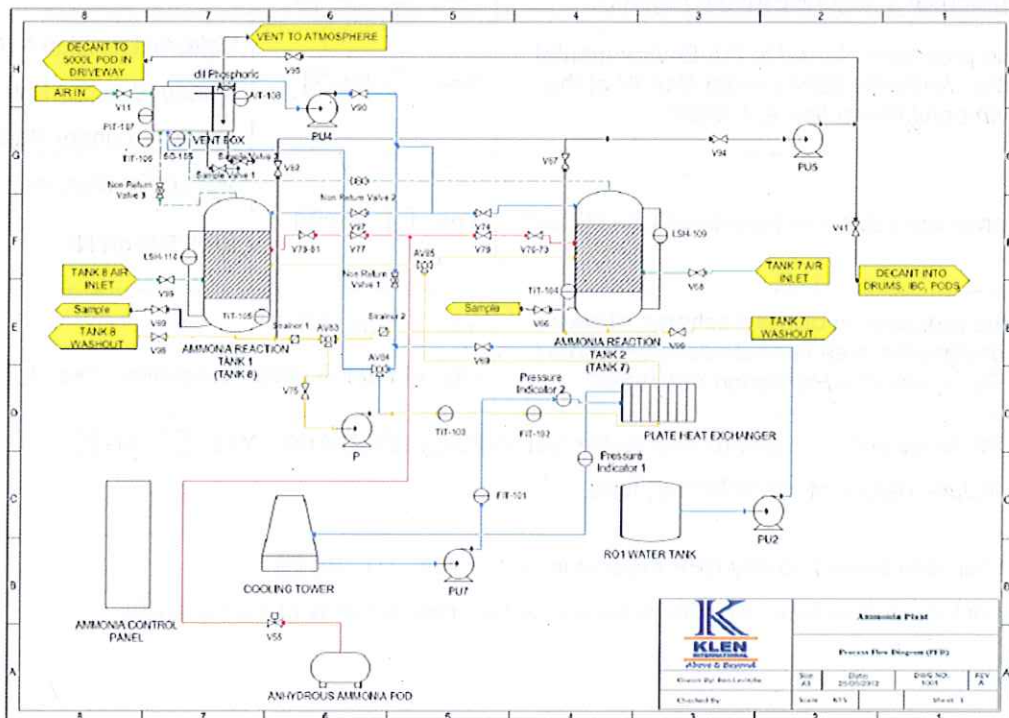


Figure 1: Process diagram for the manufacture of aqueous ammonia.





### **Corrosive Liquids Tank Farm and Integrated Blending and Package-Filling Facility**

Receipting and storage of a range of concentrated Class 8 (corrosive) liquids in bulk tanks – sodium hydroxide solution, hydrochloric acid, nitric acid, sodium hypochlorite solution and sulphuric acid. A proportion of some of these products is transferred directly into smaller containers (1 kL IBC's, and 205 and 20 litre drums) for direct resale; a proportion of some products is diluted with water and stored in purpose-built blending tanks prior to transfer into smaller containers.

The "Approved Code of Practice" Australian Standard "AS3780-2008 – the storage and handling of corrosive substances" has been applied to this facility as a means of achieving compliance to the DG Act. A dangerous goods licence (DGS021709) has been issued,

### **Adhesive Products Blending and Packaging Facility**

This facility comprises a dedicated compound housing Flammable Liquid storage and handling facilities, including:

- Flammable Liquid Mixing building,
- Separate packaged flammable goods storeroom,
- Covered bunded area for drummed product storage

This facility enables the blending of a range of solvents and adhesive products to be carried out – raw materials are contained within 200L drums and final products are transferred in to smaller consumer-sized containers for supply to customers. Flammable products are not stored in the mixing building and the mixing vessels, decanting areas and filling area are connected to a fume-capture system that discharges directly to atmosphere via a 16m stack.

This is a manually operated batch-process facility. It is designed; constructed, operated and licensed; in compliance to the requirements of the DG Act and the associated DG Regulations.

### **Wastewater Treatment Plant**

This facility comprises of a dedicated compound housing systems for the storage and treatment of liquid wastes collected from across the site. It consists of:

- A bulk Waste storage tank,
- An auxiliary bulk liquid waste storage tank,
- A Blending and a Settling tank
- A chemical reagent storage and dosing equipment

This is a manually operated batch-process facility with a schematic provided at **Figure 2**. The plant is designed, constructed, operated and licensed in compliance to the requirements of the DG Act and associated DG Regulations and in compliance with an Industrial Waste Permit issued by the Water Corporation.

This is a purpose-built facility where various liquid waste streams from across the site are collected, stored and subsequently treated prior to licensed disposal. The treatment process involves initial testing and subsequent blending of the acid and alkaline wastes to produce a



neutralised mix. The treated waste is then transferred to a settling tank, where it is tested to confirm it meets discharge criteria. The liquid component can then be discharged to sewer (in accordance with Industrial Waste Permit conditions) and the sludge is collected by a licensed waste transport company for subsequent disposal at a licensed commercially operated waste treatment plant.

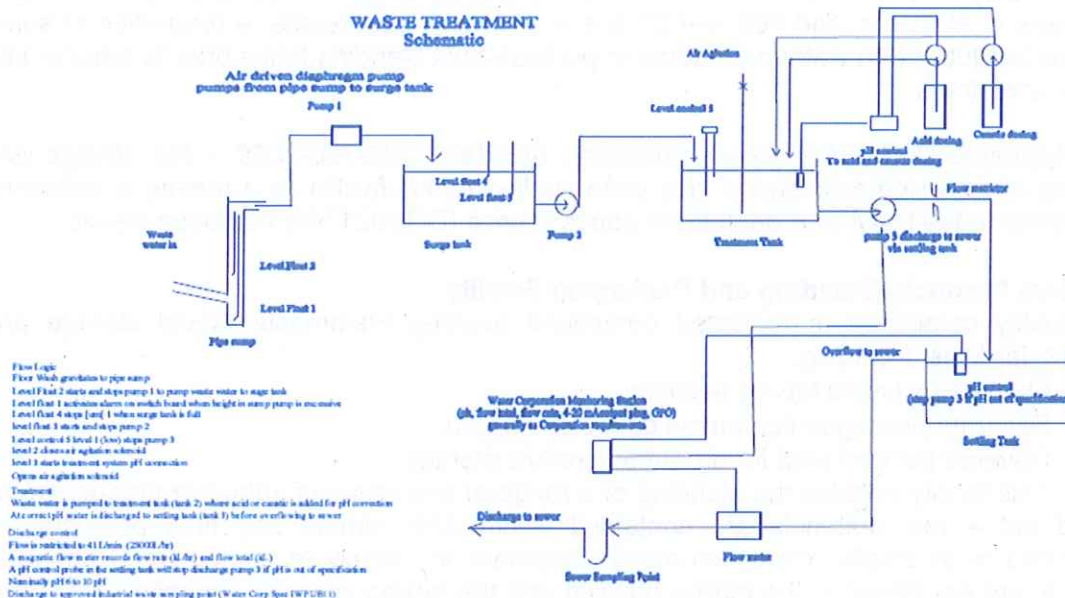


Figure 2: Waste water treatment plant schematic.





## 4 Decision Table

All applications are assessed under the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, DER's *Policy Statement - Limits and targets for prescribed premises* (2006) and the risk matrix attached to this decision document in Appendix A. Where other references have been used in making the decision they are detailed in the decision table.

DERISION TABLE				
Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
General Conditions	L1.2.5	OSC	<i>Emission Significance - 1</i> <i>Socio-political context - 3</i> /Nearby = Medium High <i>Risk Assessment - D - licence conditions</i>  Potentially contaminated stormwater is tested and re-directed into a treatment facility as required. OSC 1.2.5 has been added to the licence to ensure the Licensee implements practical measures to prevent stormwater run-off becoming contaminated and treat any potentially contaminated storm water prior to its discharge.	Environmental Protection (Unauthorised Discharges Regulations, 2004).  Application supporting documentation
	L 1.3.1-1.3.2	NSC	Ammonia gas discharge has previously occurred at the premises and NSC 1.3.1-1.3.2 has been added to ensure that the likelihood of uncontrolled discharges of ammonia to the environment is sufficiently managed.	
Emissions General	L 2.2	N/A	N/A	N/A



DERISION TABLE				
Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
Point source emissions to air including monitoring	L 2.2 L4.1 (IR1)	N/A	<p><i>Emission Significance - 1</i> <i>Socio-political context</i> – Medium High. <i>Risk Assessment - D</i> – other management mechanisms</p> <p>Adhesive Products Blending and Packaging Facility - Volatile Organic Compounds (VOC's). During filling of chemical tanks and vessels, air is displaced through tank vent points. This displaced air may contain VOC's however; calculations (based on xylene) provided by the proponent estimate the emission rates peaking at 6.81 µgm-3 of air discharged to atmosphere via an exhaust system to a 16m high stack. Based on this scenario and annual total (estimated) throughput, maximum output is estimated at 129kg (xylene) per year. Improvement condition (IR1) specifically addresses the need for further information/definition of air emissions content, quantity and management process in the context of impact to the environment. The requirement for specific licence conditions regarding air emissions will be assessed on receipt of these details.</p>	<p>Environmental Protection (Unauthorised Discharges Regulations, 2004).</p> <p>Application supporting documentation</p>
Point source emissions to surface water and groundwater including monitoring	L2.3	N/A	<p><i>Emission Significance - 1</i> <i>Socio-political context</i> – No concern or interest <i>Risk Assessment - E</i> – no regulation, other management mechanisms</p> <p>There will be no point source emissions to water during normal operations. No specified conditions relating to point source emissions to water or the monitoring of such emissions are required to be added to the licence.</p>	<p>Application supporting documentation</p>





**DERISION TABLE**

Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
Emissions to land including monitoring	L2.4	N/A	Emission Significance – 1 Socio-political context – No concern or interest Risk Assessment – E – no regulation, other management mechanisms  There will be no point source emissions to land during normal operations. No specified conditions relating to point source emissions to land or the monitoring of such emissions are required to be added to the licence.	Application supporting documentation
Fugitive Emissions	L2.5	SC	Emission Significance – 1 Socio-political context – No concern or interest Risk Assessment – E – no regulation, other management mechanisms  Fugitive emissions of ammonia or VOCs are possible if equipment failure or significant operator error occurs. Hazard assessments, treatment processes and management plans are in place to mitigate the possibility of uncontrolled emissions.	Application supporting documentation
Odour	L2.6.1	SC	Emission Significance – 1 Socio-political context – No concern or interest Risk Assessment – E – no regulation, other management mechanisms  Odours can be expected from VOCs or other chemicals being processed during normal operations, however these are not considered a significant risk with treatment processes and management plans in place. Standard conditions apply.	Application supporting documentation
Noise	N/A	N/A	N/A	N/A
Monitoring General	N/A	N/A	N/A	N/A



**DERISION TABLE**

Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
Monitoring of inputs and outputs	N/A	N/A	N/A	N/A
Process Monitoring	N/A	N/A	N/A	N/A
Ambient Quality Monitoring	N/A	N/A	N/A	N/A
Meteorological monitoring	N/A	N/A	N/A	N/A
Improvements	L4.1 IR1-IR3	NSC	Improvement condition IR1 relates to air emissions and has been included to address potential/actual emissions generated by licensed activities. Improvement conditions IR2 and IR3 relate to the tank farm and tank storage of hazardous materials and dangerous goods that are utilised on the premises. The potential for environmental harm that may be caused by sub-standard infrastructure/vessels is a risk that requires quantifying and adequate controls implemented.	Storage and handling of dangerous goods, Code of Practice, Department of Mines and Petroleum, Government of Western Australia
Information	L5.1.1-5.3.1	SC	Emission Significance – N/A Socio-political context –N/A Risk Assessment – N/A –Standard conditions for Information included in licence.	N/A





## 5 Advertisement and Consultation Table

Date	Event	Comments received/Notes	How comments were taken into consideration
22/07/2013	Application advertised in West Australian (or other relevant newspaper)	None	
01/08/2013	Application referred to interested parties listed	None	
26/08/2013	Proponent sent a copy of draft instrument	None	



## Appendix A EMISSIONS AND DISCHARGES RISK ASSESSMENT MATRIX

Note: These matrix are taken from the current DER Officer's Guide to Emissions and Discharges Risk Assessment May 2006.

**Table 3: Measures of Significance of Emissions**

Emissions as a percentage of the relevant emission or ambient standard		Worst Case Operating Conditions (95 <sup>th</sup> Percentile)			
		>100%	50 – 100%	20 – 50%	<20%*
Normal Operating Conditions (50 <sup>th</sup> Percentil	>100%	5	N/A	N/A	N/A
	50 – 100%	4	3	N/A	N/A
	20 – 50%	4	3	2	N/A
	<20%*	3	3	2	1

\*For reliable technology, this figure could increase to 30%

**Table 4: Socio-Political Context of Each Regulated Emission**

		Relative proximity of the interested party with regards to the emission				
		Immediately Adjacent	Adjacent	Nearby	Distant	Isolated
Level of Community Interest or Concern*	5	High	High	Medium High	Medium	Low
	4	High	High	Medium High	Medium	Low
	3	Medium High	Medium High	Medium	Low	No
	2	Low	Low	Low	Low	No
	1	No	No	No	No	No

Note: These examples are not exclusive and professional judgement is needed to evaluate each specific case

\*This is determined by DER using the DER "Officer's Guide to Emissions and Discharges Risk Assessment" May 2006.

**Table 5: Emissions Risk Reduction Matrix**

		Significance of Emissions				
		5	4	3	2	1
Socio-Political Context	High	A	A	B	C	D
	Medium High	A	A	B	C	D
	Medium	A	B	B	D	E
	Low	A	B	C	D	E
	No	B	C	D	E	E

**PRIORITY MATRIX ACTION DESCRIPTORS**

A = Do not allow (fix)

B = licence condition (setting limits + EMPs - short timeframes) (setting targets optional)

C = licence condition (setting targets + EMPs - longer timeframes)

D = EIPs, other management mechanisms/licence conditions (monitoring/reporting)/other regulatory tools

E = No regulation, other management mechanisms