



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Licence Holder:** Downer EDI Works Pty Ltd<sup>1</sup>

**Licence:** L8853/2014/1

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**Registered office:** Suite 13, 8 Welshpool Road  
EAST VICTORIA PARK  
WA 6101

**ACN:** 146 658 059

**Premises address:** Downer EDI Works Pty Ltd  
Lot 1046 Hoyle Road  
HOPE VALLEY WA 6165  
Being the area bound within coordinates:

**Point**

Number	Easting	Northing
1460	385811.089	6436,497.184
2818	385769.474	6436,403.672
2819	385837.609	6436,373.350
2894	385912.744	6436,393.718
2895	385772.214	6436,402.453
2901	385775.411	6436,401.030
2902	385777.443	6436,405.597
2903	385774.246	6436,407.020
2918	385936.844	6436,393.725
2919	385936.815	6436,497.219

**Issue date:** Thursday, 18 June 2015

**Commencement date:** Monday, 22 June 2015

**Expiry date:** Sunday, 21 January 2022

**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.

**Note:** The licence was transferred to Downer EDI Works Pty Ltd on 12 January 2017.

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Decision Document prepared by:

Richard Wilson



Licensing Officer

Decision Document authorised by:

Ed Schuller  
Senior Manager – Licensing (Process Industries)  
18 June 2015



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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.

### **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: 1.1.1-1.1.4, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.4, 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	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	35	350,000
	61A	120,000
Application verified	Date: 16 October 2014	
Application fee paid	Date: 21 October 2014	
Works Approval has been complied with	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Compliance Certificate received	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	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 checked="" type="checkbox"/> No <input type="checkbox"/>	
If Yes include details of which EPP(s) here. Kwinana Atmospheric Waste Policy Area B		
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
If Yes, include details here, eg Site is subject to SO <sub>2</sub> requirements of Kwinana EPP.		



### 3 Executive summary of proposal and assessment

Asphalt Surfaces Pty Ltd (Asphalt Surfaces) have constructed a Benninghoven “TBA 4000 U C” hot mix batch production type asphalt manufacturing plant in Hope Valley. The design capacity of the plant is 320 tonnes per hour, which under proposed operating hours is 350,000 tonnes per year. Actual throughput is expected to be around 150,000 tonnes per year. The site has been assessed at, and licence issued for, 350,000 tonnes per annual period to allow for future increase in production.

The plant is located at Lot 1046 Hoyle Rd (corner of Conway Road) Hope Valley, approximately 28km south of Perth. The land immediately surrounding the site has been cleared and is planned for industrial development. Lot 1046 is in the Latitude 32 Development Area 1 – Flinders Precinct. *The Hope Valley Wattleup Redevelopment Project Master Plan* (Landcorp 2008) provisions specify that for Development Area 1, no residential development will be approved in the Precinct. The area to the west is not included in the Precinct but is zoned General Industry under the Town of Kwinana Town Planning Scheme Number 2. Hence there is a high level of security against residential encroachment towards the proposed asphalt plant site. Notwithstanding that, the proponent is required to demonstrate that potential impacts on neighbouring industrial premises are minimal.

Potential impacts from asphalt plants are odour, gaseous emissions, dust and noise. The Environmental Protection Authority in Guidance Note No 3 recommends a 1,000m separation distance between asphalt plants and sensitive land uses. The nearest sensitive receptors are two residences that remain in the area zoned “general industrial” and are around 350 – 500m from the site. The next closest resident is 1.9km to the north-north-east in an area zoned “urban”.

#### Process

A process flow diagram for the facility is shown in Figure 1 below.

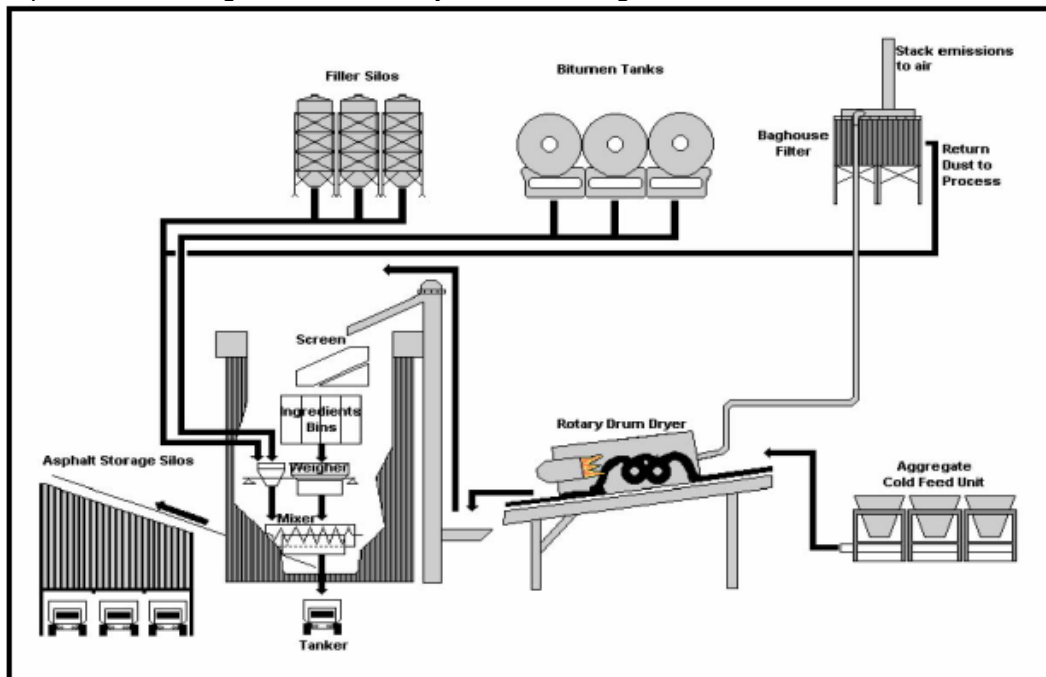


Figure 1: Process flow diagram for proposed asphalt plant.

Raw aggregate is stored in three sided, rooved storage bins. Fine filler is stored in a storage silo. Heated bitumen is stored in four heated tanks (150 °C to 160 °C) with 15m gas displacement vents (3 x 80,000L tanks and 1 x 15,000L tank).



A front end loader transfers aggregate from storage bins into cold feed bins. Aggregates are then fed into a gas fired counter flow rotary drum dryer for heating and drying. Drum temperatures for hot mix are 160-180°C. Exhaust air from the rotary drum dryer is directed to a coarse dust separator and then to a baghouse for the removal of fine dust.

The heated dry aggregates are conveyed from the drum dryer to the top of a mixing tower and separated into hot aggregate storage bins, dropped into a weigh hopper and then into a pug mill (mixer). Bitumen is pumped from a heated storage tank and injected into the pug mill mixer followed by filler. An extraction duct sucks steam, fumes and fine dust to the dryer drum. Other emissions from the mixing tower are also ducted to the baghouse. Filtered air from the baghouse is exhausted via a 32m stack.

All silos, mixers, conveyors and other transfer storage points within the tower are enclosed and operate under negative pressure to minimise dust and odour emissions. All potential waste products from the process (such as baghouse dust, unused asphalt, waste bitumen etc.) are recycled in the process.

Newly mixed asphalt is transferred to insulated and sealed overhead storage bins for storage for up to 48 hours before loading into trucks for transportation to the paving site.

Computerized controls and monitors provide responsive control over the process, and alarms and responses can be set for when set parameters, such as the temperature in the dryer drum are exceeded.

#### Warm Mix asphalt

The facility will also be able to produce “warm mix” asphalt which uses a lower drum dryer temperature of 130 °C (instead of 180 °C) and adds a water foam mix at end of the dryer. This requires less energy than traditional hot mix, reduces risk of excess fume and odour from over-heating in the drum, and reduces fume and odour during truck loading.

#### Reclaimed Asphalt Pavement (RAP)

RAP will be crushed and screened off site and will be stored onsite in accordance with the storage requirements outlined in Main Roads WA Specification 511: Materials for Bituminous Treatments.

The facility will be able to process RAP which will not be pre-heated or dried directly by the burner in this plant. RAP will be released cold from a dedicated hopper into the pug mill mixer with heated and dried aggregate and bitumen. RAP will not be processed if it contains coal tar.

#### Emissions

Potential emission points from a hot mix asphalt facility include dust from storage bins and transfer of raw materials; odour from the transfer and storage of bitumen; dust from the drum dryer; fuming (volatile organic compounds), gases, odour and dust from the pugmill and mixing tower and stack; and odour from asphalt storage tanks and transfer. The proposal documents included an assessment of the facility against the *Environmental Guidelines on Best Available Techniques (BAT) for the Production of Asphalt Paving Mixes*, European Asphalt Pavement Association, 2007. The assessment showed that the proposed plant meets the relevant minimum requirements. *BAT) for the Production of Asphalt Paving Mixes*, European Asphalt Pavement Association, 2007.

The premises is located within Area B of the Environmental Protection (Kwinana) (Atmospheric Wastes) Policy 1999. The site is not listed as a significant industrial source and therefore does not have a relevant determination for discharge of atmospheric wastes.



## 4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, DEC's Policy Statement - Limits and targets for prescribed premises (2006), 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	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.5	OSC	<p><b>Normal operation</b></p> <p><u>Emission Description</u>  <i>Emission:</i> Stormwater contaminated with environmentally hazardous materials including hydrocarbons, bitumen, reclaimed asphalt pavement (RAP) or rock aggregates.  <i>Impact:</i> Potential contamination of surrounding land and surface water drainage systems. Hydrocarbons or fine silt from the aggregate can smother flora and fauna, and pollute soil or water systems. Hydrocarbons have varying rates of degradation and may persist in the environment for many years. Groundwater is over 10m below ground level and there are no surface water bodies within 1km of the site.</p> <p><i>Controls:</i> The plant is entirely on a hardstand asphalted area that drains to containment pits. The pits are soak wells that have a sealed base and drain sideways. Only clean stormwater from the hardstand area is designed to drain to these soakwells. Bunded areas drain to a plate separator which separates clean water and hydrocarbons. The plate separator discharges clean water to the sewerage system.</p> <p>All bulk and drum storages to be within sealed, bunded areas constructed to 110% containment capacity.</p> <p>Areas underlying storage of liquid dangerous goods to be sealed and bunded to 110% of storage capacity and will be stored in compliance with licence condition</p>	Application supporting documentation



DECISION 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
			<p>1.2.3.</p> <p>All transfers of bulk hydrocarbons to be made within bunded areas. Contents of hoses/couplings to bulk hydrocarbons storage are drained to containers after filling/decoupling.</p> <p>All stormwater run-off from sealed areas to be retained on-site via stormwater soakwells across the site.</p> <p><u>Risk Assessment</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            The OSC L1.2.5 ensures stormwater is diverted so it is not contaminated by the activities on site and that potentially contaminated stormwater is treated as necessary.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p>	
<b>Premises Operation</b>	L1.3.1-L1.3.3		These conditions relate to point source emissions to air and as such have been assessed in the appropriate section below.	Application supporting documentation





DECISION 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 general	L2.1.1 L2.4.1 and L2.5.1	OSC	Condition 2.1.1 requires the licensee to investigate the exceedances of any descriptive or numerical limit set in section 2. Descriptive limits will be set in condition 2.2 of the licence and therefore OSC 2.1.1 regarding recording and investigation of exceedances of limits or targets has been included.  Conditions 2.4.1 and 2.5.1 set descriptive limits for dust and odour respectively.	N/A
Point source emissions to air including monitoring	L2.2.1-2.2.3 and L3.2.1-3.2.3	OSC	<b>Normal operation</b> <u>Emission Description</u> <i>Emission:</i> Combustion gases (NOx and CO), and particulates from the plant stack A1 (normal operation) <i>Impact:</i> Reduced local air quality and impacts on plants, soils, lakes and streams can occur from these emissions. NOx can damage the leaves of plants, decrease their ability to photosynthesise and decrease their growth. In addition to directly affecting plants, NOx when deposited on land and in estuaries, lakes and streams can acidify and over-fertilize sensitive ecosystems resulting in a range of harmful indirect effects on flora and fauna including changes in biodiversity, loss of habitat, reduced tree growth and algal blooms. NOx and particulate matter can also contribute to adverse human health effects on the respiratory system.  The nearest residence is 1.9 km north-north-east of the premises. The nearest bushforever sites are 1.6km North of the site and 2.5km south of the site.  <i>Controls:</i> The baghouse filter is designed to reduce particulate emissions to below 20mg/m <sup>3</sup> with the opacity meter alarm being set at 30mg/m <sup>3</sup> . Differential pressure sensors will be set to alarm if a differential pressure indicates a leak and production will cease until the cause of the alarm has been rectified. The stack height is 32m which will reduce the likelihood of emissions impacting receptors due to increased dispersion.	Ambient Air Assessment Criteria, National Environmental Protection Measure (Ambient Air Quality)  Application supporting documentation  Environmental Guidelines on Best Available Techniques (BAT) for the Production of Asphalt Paving Mixes, European Asphalt Pavement Association.



DECISION 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
			<p><u>Risk Assessment</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            The asphalt plant has been designed with emission abatement. Condition 1.2.2 requires the equipment, including emissions control measures, to be maintained on a regular basis. Limits based on the Environmental Guidelines on Best Available Techniques (BAT) for the Production of Asphalt Paving Mixes have been applied to section 2.2 of the Licence to ensure emissions remain acceptable. Condition 2.2.2 sets the target for particulate emissions from the stack at 30mg/Nm<sup>3</sup>. The plant manufacturer guarantees particulate emissions performance below 20mg/Nm<sup>3</sup> at 17%O<sub>2</sub>. Stack emissions will be verified by annual stack testing.</p> <p>Condition 3.2.1 requires annually Stack testing to measure particulate matter (PM), NOx, total VOCs and CO. This will allow the efficiency of the plant to be tracked over time to and ensure the emissions are acceptable.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Residual Risk Rating:</i> Moderate</p>	
<b>Point source emissions to surface water including monitoring</b>		N/A	There are no point source emissions to land from the Premises.	Application supporting documentation



DECISION 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 groundwater including monitoring		N/A	There are no point source emissions to groundwater from the Premises.	Application supporting documentation
Emissions to land including monitoring		N/A	There are no point source emissions to land from the Premises.	Application supporting documentation
Fugitive emissions	L2.4.1	OSC	<p><b>Normal operation</b>  <u>Emission Description</u>  <i>Emission:</i> Fugitive dust is generated from movement of vehicles, materials handling and lift off from stockpiles.  <i>Impact:</i> Dust emissions can be harmful to human health and the environment. Elevated total suspended particulates (TSP) impacts ambient environmental quality which can result in amenity impacts and can smother vegetation. Particulate matter that is less than 10 (PM<sub>10</sub>) or 2.5 (PM<sub>2.5</sub>) micrometres in diameter can be drawn deep into the lungs creating health impacts. The chemical and physical properties of the particles, the size of the particles and the duration of exposure are all factors which may affect human health. Potential staff on site and neighbouring businesses or nearby residents may be affected.</p> <p><i>Controls:</i>            All silos, mixers, conveyors and other transfer storage points within the tower operate under negative pressure to minimise dust and odour emissions.</p> <p>Raw aggregate is stored in three sided, rooved storage bunkers. These bunkers will be fitted with water sprays that will be operated on an as needs basis to control potential dust emissions.</p> <p>Fine filler is stored in a storage silos. These silos are fitted with filters and are</p>	Application supporting documentation



DECISION 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
			<p>fully insulated to prevent any dust emission.</p> <p>The site is entirely hardstand which will ensure there is limited dust emissions from traffic movement on site. There is also a street sweeper on site that will be used on an as needed basis to ensure there is no build-up of dust on trafficable areas.</p> <p><u>Risk Assessment</u>  <i>Consequence: Minor</i>  <i>Likelihood: Possible</i>  <i>Risk Rating: Moderate</i></p> <p><u>Regulatory Controls</u>            OSC 2.4.1 has been included in the Licence to ensure adequate management of fugitive dust emissions on site.</p> <p><u>Residual Risk</u>  <i>Consequence: Minor</i>  <i>Likelihood: Possible</i>  <i>Risk Rating: Moderate</i></p>	
<b>Odour</b>	L2.5.1	NSC	<p><b>Normal operation</b></p> <p><u>Emission Description</u>  <i>Emission:</i> In the process of mixing hot bitumen with hot aggregate, bitumen is partially volatilised and creates a characteristic odour due to VOCs. The mixing of RAP in the pug mill with super-heated virgin material may produce odour.  <i>Impacts:</i> Negative impacts on health, welfare, comfort or amenity of nearby residents or persons. The nearest residence is roughly 1.9km North-north-east of the premises.  <i>Controls:</i> All silos, mixers, conveyors and other transfer storage points within the tower operate under negative pressure to minimise dust and odour emissions.</p>	Application supporting documentation



DECISION 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
			<p>An extraction system in the pug mill directs vapours back through the drum dryer and baghouse and is emitted through the 32m stack.</p> <p>Newly mixed asphalt is transferred to insulated and sealed overhead storage bins for storage for up to 48 hours before loading into trucks for transportation to the paving site.</p> <p>Computerized controls and monitors provide responsive control over the process, and alarms and responses can be set for when set parameters are exceeded.</p> <p>Drum temperature for hot mix is set to 160°C - 180°C.</p> <p>Exhaust air from the rotary drum dryer is directed to a coarse dust separator and then to a baghouse for the removal of fine dust. The heated dry aggregates are conveyed from the drum dryer to the top of a mixing tower and separated into hot aggregate storage bins, dropped into a weigh hopper and then into a pug mill (mixer). Bitumen is pumped from a heated storage tank and injected into the pug mill mixer followed by filler. An extraction duct sucks steam, fumes and fine dust to the dryer drum from the pug mill. Other emissions from the mixing tower are also ducted to the baghouse. Filtered air from the baghouse is exhausted via a 32m stack.</p> <p>The Licensee has advised Ecosorb can be used as a temporary measure if odour becomes an issue from the bitumen tanks. Ecosorb is a natural substance that neutralises odourous gases and was trialed at the Licensee's Bibra Lake facility.</p> <p><u>Risk Assessment</u>  <i>Consequence: Minor</i>  <i>Likelihood: Unlikely</i>  <i>Risk Rating: Moderate</i></p>	



DECISION 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
			<p><u>Regulatory Controls</u> OSC 2.5.1 has been included in the Licence to ensure adequate management of odour emissions so as not to unreasonably interfere with the health, welfare, comfort or amenity of any person who is not on the Premises.</p> <p><u>Residual Risk</u> <i>Consequence: Minor</i> <i>Likelihood: Unlikely</i> <i>Risk Rating: Moderate</i></p>	
Noise	L2.6	N/A	<p><b>Normal operation</b> <u>Emission Description</u></p> <p><i>Emission:</i> Noise emissions from the operation of the plant, site vehicle movements such as movement of trucks and the front end loader <i>Impacts:</i> Nuisance noise impacts on neighbouring businesses and residences. Neighbouring businesses are located on adjacent properties and residences are approximately 1.9km away.</p> <p><i>Controls:</i> The site complies with the <i>Guidance for the Assessment of Environmental Factors – Separation distances between Industrial and Sensitive Land Uses.</i> (EPA 2005) recommended buffer of 1000m to any residence with the nearest residence being 1.9km from the premises.</p> <p>The site is low lying and within in the Latitude 32 Flinders Precinct.</p> <p>The plant is designed to have indicative sound levels of 68.0 dB(A) L<sub>eq</sub> and 72.3 dB(A) maximum which corresponds to 60.2 dB(A) at 100m (approximate site boundary) and 40.2 dB (A) at 1000m (conservative residences).</p>	<p>Application supporting documentation</p> <p><i>Environmental Protection (Noise) Regulations 1997</i></p> <p><i>Guidance for the Assessment of Environmental Factors – Separation distances between Industrial and Sensitive Land Uses.</i> (EPA 2005)</p>



DECISION 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
			<p>These levels comply with the L<sub>max</sub> criteria for commercial /industrial (80-90 dB(A)) and residential (55dB(A)) premises in the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations).</p> <p>The licensee has committed to conducting a noise assessment against the Noise Regulations once the plant has been commissioned to verify emission levels.</p> <p><u>Risk Assessment</u>  <i>Consequence: Minor</i>  <i>Likelihood: Rare</i>  <i>Risk Rating: Low</i></p> <p><u>Regulatory Controls</u>            The site is required to comply with the <i>Environmental Protection (Noise) Regulations 1997</i>.</p> <p><u>Residual Risk</u>  <i>Consequence: Minor</i>  <i>Likelihood: Rare</i>  <i>Risk Rating: Low</i></p> <p>There are no noise conditions required for this Premises. The site is expected to comply with the <i>Environmental Protection (Noise) Regulations 1997</i>.</p>	
<b>Monitoring general</b>	L3.1.1-3.1.2 L3.2.1-3.2.3	OSC	<p>General monitoring conditions have been included on the Licence to support the monitoring relating to point source emissions to air. OSCs L3.1.1 and L3.1.2 have been included to ensure monitoring is carried out at least 9 months apart and in accordance with appropriate standards.</p> <p>Condition 3.2.1 requires the licensee to conduct stack testing every 12 months to ensure the efficient operation of the baghouse filter under normal operations.</p>	Application supporting documentation



<b>DECISION TABLE</b>				
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>OSC or NSC</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
			Condition 3.2.2 ensures the stack test is undertaken at a location that is consistent with the relevant Australian Standard.  Condition 3.2.3 ensures that the stack test is undertaken by a NATA accredited professional.	
<b>Monitoring of inputs and outputs</b>	N/A	N/A	There are no monitoring of input and outputs required for this Premises.	
<b>Process monitoring</b>	N/A	N/A	There are no process monitoring conditions required for this Premises.	
<b>Ambient quality monitoring</b>	N/A	N/A	There are no ambient quality monitoring conditions required for this Premises.	
<b>Meteorological monitoring</b>	N/A	N/A	There are no meteorological quality monitoring conditions required for this Premises.	
<b>Improvements</b>	N/A	N/A	There are no improvements required for this Premises.	
<b>Information</b>	L5.2.1	OSC	Condition 5.21 requires the licensee to submit results from stack tests conducted annually.	
<b>Licence Duration</b>	N/A	N/A	This Licence will be issued for 5 years as the regulatory controls imposed by the licence ensure risks to the environment are adequately managed.	





## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
27/10/2015	Application advertised in West Australian	No comments received.	NA
17/06/2015	Proponent sent a copy of draft instrument	Minor comments received	Comments addressed in document



## 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