



## Application for Works Approval

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Works Approval Number</b>	W6703/2022/1
<b>Applicant</b>	Enviroclean (Victoria) Pty Ltd
<b>ACN</b>	144 794 347
<b>File number</b>	DER2022/000299
<b>Premises</b>	Warthog Workshop Washers Unit 8 51 Prindiville Drive WANGARA WA 6065  Legal description Lot 8 on Plan 75890 Certificate of Title Volume 2931 Folio 567 As defined by the premises map attached to the issued works approval
<b>Date of report</b>	06/09/2022
<b>Decision</b>	Works approval granted

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## 1. Decision summary

Enviroclean (Victoria) Pty Ltd (applicant) submitted an application for a works approval under Division 3 Part V of the *Environmental Protection Act 1986* (EP Act) to establish a facility for the recycling of degreaser under Category 39 (Chemical or oil recycling) in Schedule 1 of the *Environmental Protection Regulations 1987*. This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6703/2022/1 has been granted.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (department) has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Application summary and overview of premises

On 10 June 2022, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act). The application is to establish Warthog Workshop Washers, a facility for recycling of degreaser (narrow -cut kerosene) on Prindiville Drive in an industrial area of Wangara (premises) approximately 450m from nearest residence.

The applicant has been operating a solvent distilling operation in Bibra Lake since 2017 (L9047/2017/1) and is relocating to the new premises in Wangara. The applicant manufactures, leases and sells workshop part washers to mechanical workshops. The washers are periodically serviced and used solvent containing mineral oils is transported to the recycling facility where the applicant will use a sealed still to distil the solvent thereby producing clean solvent and waste oil. Clean solvent is returned to parts washing machines and waste oil is disposed of to a licenced facility for recycling or destruction.

The premises relates to the category 39, chemical or oil recycling and assessed production capacity of 15 tonnes per annum under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6703/2022/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in works approval W6703/2022/1.

## 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

## 3.1 Source-pathways and receptors

### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

**Table 1: Proposed applicant controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Noise	Works construction of bunds and installation of equipment	Airborne/Wind	Works only involve movement of mobile equipment and installation of bunds Works will be conducted inside a building Separation distance sufficient.
<b>Operation</b>			
Odour	Stored solvent and distillation.	Airborne/Wind	Still is sealed vacuum still. Transfer of liquids by vacuum IBCs sealed when not in use.
Leaks and spills of solvent	Stored IBCs Still	Direct discharge to land or stormwater infrastructure	Bunding to be installed both to contain the stored solvent and still and to bund the entire workshop. Bund to comply with AS1940.1917 Additional banded pallet for IBCs

### 3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

**Table 2: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Residential Premises	450 metres from boundary of premises
Environmental receptors	Distance from prescribed activity
Underlying groundwater (non-potable purposes)	Approx. 36 m

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Works approval W6703/2022/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises i.e. solvent recycling. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

**Table 3: Risk assessment of potential emissions and discharges from the premises during construction, and operation**

Risk events					Risk rating <sup>1</sup> C = consequence L = likelihood	Applicant controls sufficient?	Conditions <sup>2</sup> of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
<b>Construction</b>								
Installation of still and bunds for IBCs	Dust	Air/windborne pathway causing impacts to health and amenity	Residences 460 m north	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	N/A	Short duration and minor works within an existing building to install new equipment. Site located within industrial area. No construction phase noise or dust impacts expected therefore no controls specified in the works approval
	Noise			Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	N/A	
<b>Operation (including time-limited-operations operations)</b>								
Distilling narrow cut kerosene for parts washing machines	Odour	Air/windborne pathway causing impacts to amenity	Residential premises 460 m north and surrounding businesses	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Condition 1	Activity is small scale with equipment (containers and still) located in a building. Site located in an industrial area. Offsite odour impacts not expected if applicant implements proposed controls.
	Spills of hydrocarbon solvent	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Local stormwater infrastructure	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 6	Potential for impacts to soil and groundwater, however activity is small scale, located within industrial area and applicant has proposed acceptable design controls for bunding and containment.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

Consultation method	Comments received	Department response
Application advertised on the department's website on 15/07/2022	None received	NA
City of Wanneroo – referral as direct interest stakeholder	City of Wanneroo advised on 02/08/2022 that proposal did not require planning approval and had no comments / objections.	NA
Applicant provided with draft decision for comment	Applicant responded with no comments and waived the 21 day period.	NA

## 5. Works approval controls

Based on the assess risk outcomes, the delegated officer determined that the applicant's proposed controls were adequate and acceptable to manage the risk of unacceptable impacts from emissions and discharges. The works approval will specify conditions consistent with the applicant's proposed controls as specified in the works approval. This includes design controls to ensure the required bunding and containment outcomes and also time limited operation requirements to authorise the assessed volume of degreaser and ensure that waste materials are stored appropriately.

## 6. Decision

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements. The delegated officer's decision took into account the following:

- Size and scale of the proposed activity, including that it will be located within a building with sealed equipment;
- Location within an industrial area and approx. 460m from the nearest residential receptor;
- The main risk of impacts is associated with potential soil or groundwater impacts through seal. Conditions on a works approval and future licence consistent with the applicant's proposed controls can adequately manage the risk of potential impacts.

The works approval will require the applicant to submit a compliance report at the completion of construction and authorise up to 180 calendar days of time limited operations while the applicant applies for a licence. Subject to compliance reporting and the licence application, the delegated officer expects the conditions of a future licence to be consistent with time limited operational conditions on the works approval.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY		
<b>Application type</b>		
Works approval	<input checked="" type="checkbox"/>	
Date application received	9 June 2022	
<b>Applicant and Premises details</b>		
Applicant name/s (full legal name/s)	Enviroclean (Victoria) Pty Ltd	
Premises name	Warthog workshop washers	
Premises location	Unit 8 51 Prindiville Drive Wangara	
Local Government Authority	City of Wanneroo	
<b>Application documents</b>		
HPCM file reference number:	DWERDT616170	
Key application documents (additional to application form):	Response to written planning advice Supporting documentation Description of works	
<b>Scope of application/assessment</b>		
Summary of proposed activities or changes to existing operations.	Installation of solvent distilling equipment and IBC containers with portable bunds.	
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>		
<b>Table 1: Prescribed premises categories</b>		
Prescribed premises category and description	Proposed production or design capacity	Proposed changes to the production or design capacity (amendments only)
Category 39: Chemical or oil recycling	15 tonnes per annum	NA
<b>Legislative context and other approvals</b>		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No:
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	General lease <input checked="" type="checkbox"/> Expiry:



Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Approval:
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i> )	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<i>Dangerous Goods Safety Act 2004</i> <i>Environmental Protection (Controlled Waste) Regulations 2004.</i>
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A Date of classification: N/A