Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Licence

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

Licence Number	L2845/2025/1
Applicant	Aquila Holdings (WA) Pty Ltd
ACN	659 814 276
File number	APP-0027151
Premises	Vac West Industrial 41 Foskew Way NARNGULU WA 6532 Legal description Lot 130 on Deposited Plan 67361 Certificate of Title Volume 1681 Folio 264 As defined by the premises map attached to the issued licence
Date of report	3/04/2025
Decision	Licence granted

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A/MANAGER WASTE INDUSTRIES

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L2845/2025/1 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 (the department; DWER) 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 January 2025, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act). The application is to seek a licence relating to storing industrial wash water at the premises. The premises is located at 41 Foskew Way, Narngulu, approximately 3 km east of Geraldton.

The applicant provides sweeping and vacuum truck operations to exporters at the Mid West Ports Authority. The applicant was granted approval to construct and install infrastructure relating to storing wash water from vehicle wash down at Mid West Ports Authority under works approval W6921/2024/1. The works approval authorised the acceptance and storage of this wash water under time-limited operations. The applicant is now seeking a licence to continue operation as a Category 61 liquid waste facility.

Wash water is stored in two tanks, each with a capacity of 32,000L, before it is transported to a licensed liquid waste disposal facility. The wastewater is classified as L150 industrial wash waters contaminated with a controlled waste under the Environmental Protection (Controlled Waste) Regulations 2004 (Controlled Waste Regulations). The applicant holds a Controlled Waste carrier licence T00526. The carrier licence includes carrying L150 industrial wash waters contaminated with a controlled waste.

As part of this application, the applicant is seeking authorisation to add a third tank for storing wash water. The applicant intends on further increasing storage of liquid waste in the future, however this decision report only assesses emissions for three tanks.

The premises relates to the category and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L2845/2025/1. 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 licence L2845/2025/1.

3. Local government approval

The landowner, J & L Hirst Holdings Pty Ltd, was granted development approval from the City of Greater Geraldton on 13 May 2024 for an additional third wastewater storage tank. Conditions from the development approval relevant to this application are:

- As per the site plan the tanks must be at least 1m from the premises boundary.
- Condition 8 in the previous planning approval: All stormwater is to be disposed of onsite to the approval of the local government.

- Note v in the previous planning approval: On application for a building licence a detailed design of stormwater collection and disposal system of developed areas is to be supplied.

4. 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.

4.1 Source-pathways and receptors

4.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises 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

Source	Emission	Potential pathways	Proposed controls
Construction			
Vehicle and/or machinery movement on unsealed road during tank installation	Dust	Air / windborne pathway	• Reduce speed limit • Tank is prefabricated with minor works to install and connect
	Noise		• Premises is located in an industrial area • Tank is prefabricated with minor works to install and connect
Leaks and spills of wash water from existing two tanks during third tank installation	Waste and leachate	Overland runoff and subsurface seepage	None proposed.
Operation			
Vacuum truck/ vehicle movement and operation	Noise	Air / windborne pathway	• Premises is located in an industrial area
Vacuum truck/ vehicle movement on unsealed road	Dust	Air / windborne pathway	• Reduce speed limit

Source	Emission	Potential pathways	Proposed controls
Leaks and spills of wash water	Waste and leachate	Overland runoff and subsurface seepage	• The tanks are/will be installed upon a HDPE liner. • The tanks are constructed to Australian Standard AS4766:2066 and the walls strengthened to a rating of 1.2. • There is impermeable bunding set up on all sides of the tanks with a pump and pipework to divert water from leaks/overflow to the wash down pad and slipway. • The existing wash down pad is impermeable, bunded and drains to the slipway. • The existing slipway is impermeable, bunded and drains to a blind sump. • When the slipway overfills it flows back up and onto the wash down pad. The wash down pad and slipway have a combined capacity of approximately 32,500L (one tank's worth of volume). • There will be a spill tray at each connection to catch any drips during connection / disconnection. • The tanks will remain coupled to the manifold at all times during loading and unloading. The manifold has a check valve fitted. • The tanks have/will have 3-inch butterfly taps on the outlet, along with a backup double isolated camlock cap. • There will be a full spill kit available on the wash down pad. • Connection to the truck will be carried out upon the wash down pad, which runs into a secured slipway should there be a mishap.
Overflow of untreated wash water from storage tanks			• The tanks are pre-installed with level gauges for monitoring by the manufacturer.

4.1.2 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 and Figure 1 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**
Nearby residences	Nearest residences are approximately 1.26km northeast of the Premises boundary.
Suburb of Wandina	Approximately 3km west of the Premises.
Geraldton Junior and Senior Motorcross Club	Approximately 1.5km northwest of the Premises
Environmental receptors	**Distance from prescribed activity**
Surface water	Premises is within the RIWI Act Surface Water Area and Irrigation District - Greenough River and Tributaries Catchment Area.
Groundwater	Premises is within the RIWI Act Arrowsmith Groundwater Area. Depth to groundwater is ~10-20 mbgl. Groundwater salinity is 3000-7000mg/L TDS (Perth Groundwater Map).
Cultural receptors	**Distance from prescribed activity**
Aboriginal Sites and Heritage Places	**There are 2 within 2km:** • **Place ID:** 20854 **Name:** Geraldton Southern Transport Corridor Field Site 03 **Place status:** Historic **Place type:** Modified Tree Approximately 1.19km north of the premises • **Place ID:** 20852 **Name:** GSTC-ISO-01 to 04 **Place status:** Historic Approximately 1.35km north of the premises

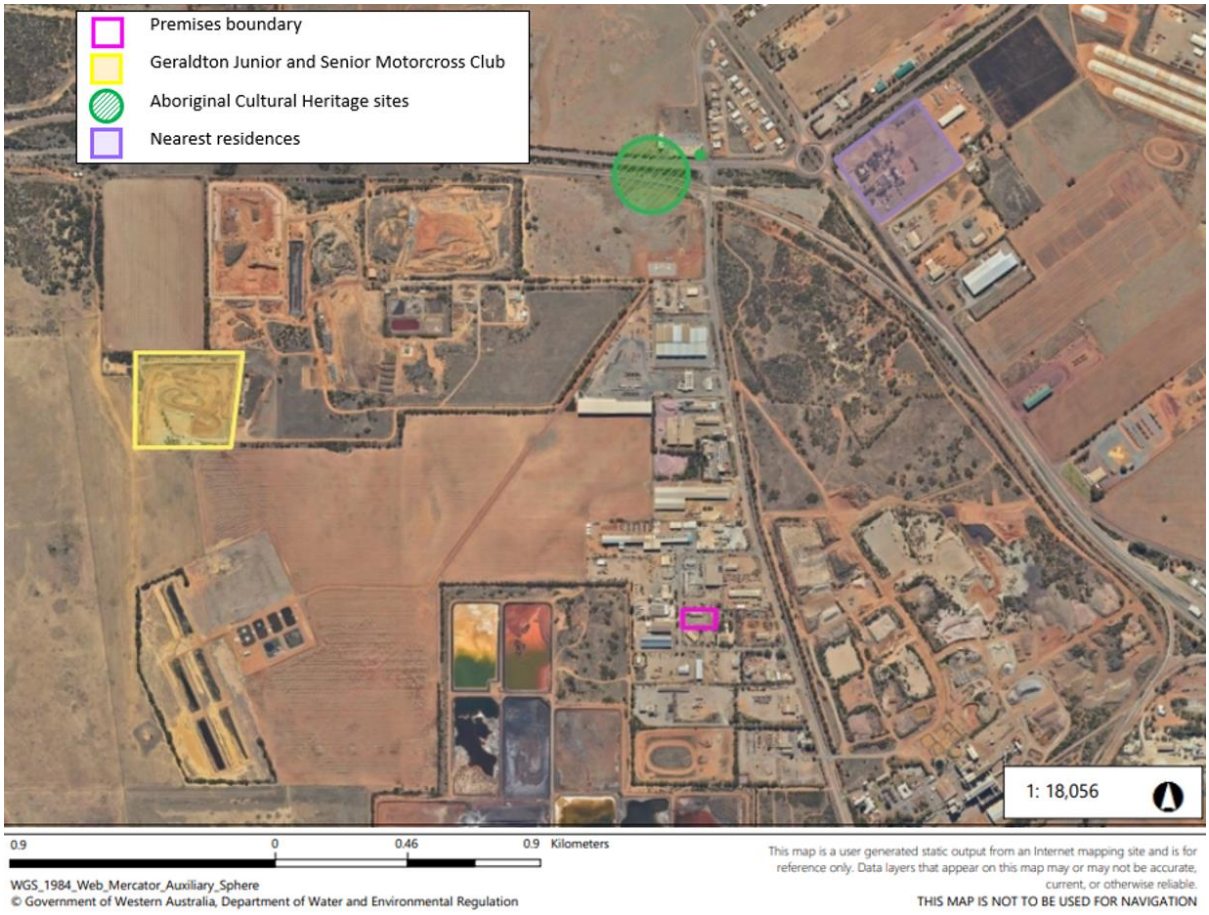

Figure 1: Distance to sensitive receptors

4.2 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 4.1. 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 4.1), 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 licence 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.

Licence L2845/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. storing industrial wash water.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

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

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Vehicle and/or machinery movement on unsealed road during tank installation	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Nearby residences	Refer to Section 4.1	C = Slight L = Unlikely **Low Risk**	Yes	N/A	Given the minor nature and scale of the construction works, with the works occurring within an existing industrial area sufficiently separated from residential areas, the Delegated Officer does not reasonably foresee offsite receptors being impacted by dust emissions associated with construction works relating to the tank installation.
	Noise	**Pathway:** Air/windborne pathway **Impact:** Amenity			C = Slight L = Unlikely **Low Risk**	Yes	N/A	Given the minor nature and scale of the construction works, with the works occurring within an existing industrial area sufficiently separated from residential areas, the Delegated Officer does not reasonably foresee offsite receptors being impacted by noise emissions associated with construction works relating to the tank installation.
Leaks and spills of wash water from existing two tanks during third tank installation	Waste and leachate	**Pathway:** Overland runoff and subsurface seepage **Impact:** Impacts to surface water and groundwater	Surface water Groundwater		C = Minor L = Unlikely **Medium Risk**	Yes	Condition 1, 10	The third tank will be standalone and there is a manifold to isolate flow from the other tanks during installation. Additionally, the third tank is proposed to be installed on the existing HDPE lined and bunded area, which drains to the slipway. The Delegated Officer considers these measures able to mitigate the risk of leaks and spills during the installation of the third tank. These controls will be added as construction conditions on the licence.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Operation								
Vacuum truck/ vehicle movement and operation	Noise	**Pathway:** Air/windborne pathway **Impact:** Amenity	Nearby residences	Refer to Section 4.1	C = Slight L = Unlikely **Low Risk**	Yes	N/A	Given the minor nature and scale of the operations occurring within an existing industrial area sufficiently separated from residential areas and during working hours, the Delegated Officer does not reasonably foresee offsite receptors being impacted by noise emissions associated with operations.
Vacuum truck/ vehicle movement on unsealed road	Dust	**Pathway:** Air/windborne pathway **Impact:** Health and amenity			C = Slight L = Unlikely **Low Risk**	Yes	N/A	Given the minor nature and scale of the operations occurring within an existing industrial area sufficiently separated from residential areas, the Delegated Officer does not reasonably foresee offsite receptors being impacted by dust emissions associated with operations.
Leaks and spills of wash water	Waste and leachate	**Pathway:** Overland runoff and subsurface seepage **Impact:** Impacts to surface water and groundwater	Surface water Groundwater		C = Minor L = Unlikely **Medium Risk**	Yes	Condition 1	The Delegated Officer considers the applicant's proposed controls will mitigate leaks and spills at the premises. These controls will be added as operational conditions on the licence.
Overflow of untreated wash water from storage tanks					C = Minor L = Unlikely **Medium Risk**	Yes	Condition 1	The Delegated Officer considers the applicant's proposed controls will mitigate overflows from a 32,000L tank. These controls will be added as operational conditions on the licence.

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.

5. 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 21 February 2025.	None received.	N/A.
Local Government Authority (City of Greater Geraldton) advised of proposal on 21 February 2025.	None received.	N/A.
Applicant was provided with draft documents on 20 March 2025.	The applicant responded on 24 March 2025 advising they had no comments and wished to waive the comment period.	N/A.

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

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, *Perth Groundwater Map*. Available at Perth Groundwater Map (Accessed: 22 January 2025).
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.