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	L2963/2025/1
Applicant	Dodd & Dodd Group Pty Ltd
ACN	009 238 671
Application number	APP-0029271
Premises	C.D. Dodd - Onslow Lot 550 Onslow Road TALANDJI WA 6710 Legal description - Part of Lot 550 on Deposited Plan 414367 Reserve 53324 As defined by the Premises Map in Schedule 1 of the issued licence
Date of report	26 June 2025
Decision	Licence granted

Adam Harbeck

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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 to public health from emissions and discharges during the operation of the premises. As a result of this assessment, Licence L2963/2025/1 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 22 May 2025, Dodd & Dodd Group Pty Ltd (the applicant) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application sought a licence for the continued operation of a facility established for the decontamination of decommissioned offshore infrastructure, and scrap metal processing and salvaging at Lot 550 Onslow Road, Talandji (the premises). The premises is located adjacent to the Pilbara Regional Waste Management Facility (PRWMF) and proposed future industrial lots, approximately 36 km south of the town of Onslow.

The premises were constructed under Works Approval W6828/2023/1, issued by the department on 30 November 2023. Works Approval W6828/2023/1 permits time limited operation of the premises until 30 June 2025, with the following activities being undertaken:

- Acceptance of decommissioned offshore oil and gas infrastructure (i.e. skids, heat exchangers, subsea tree production systems, chains and anchors, and rigid pipe sections and flexible flowlines).
- Assessment of offshore infrastructure for potential contamination. Items accepted at the premises can be contaminated by:
    - naturally occurring radioactive materials (NORM) through amalgamation of radium and diffusion into scale
    - mercury residues resulting from contamination of process equipment, adsorption and chemisorption to steel surfaces, primarily through amalgamation and diffusion into scale
    - hydrogen sulphide (H_2S) residues trapped within sludge, scale, or sour service system by-products
    - benzene, toluene, ethylbenzene and xylene (BTEX) compounds which may be present in tank residues, pipeline debris or adsorbed onto oily sludge, and
    - marine growth (biological fouling) which may potentially contain heavy metals, hydrocarbons and pathogenic organisms

  Potentially contaminated items are supplied with a unique identification number associated with a Radio-Frequency Identification (RFID) tag and tracked through a Recovered Material Tracking Register (RMTR). The register includes the results of contamination screening which has been undertaken offshore, at storage locations, and upon acceptance at the facility, and the results of testing undertaken for decontamination clearance and certification.

- Decontamination of items at chemical cleaning (HEFU) stations and the Automatic High Pressure Decontamination Facility (AHDF) Station as per the following processes:
    - Mercury contaminated items are decontaminated using chemicals and high-pressure washing or high energy flushing to dissolve and remove residues and scale. Elemental and compound mercury is converted into an insoluble compound and contained within the cleaning solution in a stabilised form, preventing it from redepositing.
    - NORM contamination is removed from items through high-pressure water jetting to remove contaminated scale. Chemical cleaning is typically not required as the NORM is deposited in the form of barite scales, which are chemically insoluble and amenable to high pressure water jetting. However, some softer barite scales are amenable to chemical cleaning, which may be used where high-pressure water jetting is not practicable.
- Treatment of wastewater containing stabilised mercury and dislodged scale from cleaning and decontamination activities via the onsite wastewater treatment units, where the contaminants are captured via filtration.
- The reuse of treated wastewater (where it has been filtered down to less than one micron) in cleaning/decontaminating processes.
- The cleaning of items solely contaminated by marine growth in the dedicated wash-down area.
- The storage of decontaminated and uncontaminated items (including those only affected by marine growth) in a designated area prior to being cut into smaller segments in-situ and moved for scrapping.
- The resizing of scrap metal items through oxy cutting and shearing during daylight hours only.

Scrapped and decontaminated items are transported to C.D. Dodd's Karratha facility for further processing and material recovery.

During time-limited operations, the works approval holder identified additional activities not authorised under the works approval which were required to allow decontamination processes to be undertaken effectively. These additional activities have been requested to be authorised within the licence and include:

- Pipe Cutting Station: Decommissioned subsea rigid pipes are segmented on the seabed to facilitate their retrieval by boat. The process used for segmenting the pipes crimps their ends which makes it difficult to insert cleaning equipment and testing probes into the pipes when they arrive at the premises. Therefore, a cutting station is required to be established to cut off the crimped pipe ends. The pipe ends cut off for this process are treated as potentially contaminated and stored in enclosed half-height steel containers prior to decontamination or off-site disposal.
- Pipe End Opening Station: This station is required as an alternative to the Pipe Cutting Station and uses a hydraulic press to reshape and reopen the end of the pipe. This avoids cut-off ends which need to be treated as contaminated items. However, a bandsaw will also be available if pipes cannot be reopened sufficiently and need to be cut.
- Large Structure Decontamination: Some structures received at the premises are too large and heavy to move to the appropriate stations for processing. These structures include wellheads, 'Christmas trees' (configurations of valves, pipe spools and fittings designed to regulate the flow of oil from a well), and manifolds. These items are

proposed to be decontaminated in-situ using temporary bunds, IBCs, pumps, cleaning connectors and lances to recirculate chemicals and water in a closed loop and prevent spills. An example of the set-up which is used is depicted in Figure 1.

- Wastewater: Clarification is requested in the licence that treated wastewater can be used for all decontamination activities and is not limited to use in the AHDF or cleaning stations only. Where wastewater cannot be filtered to less than 1 micron, it is removed off-site for disposal to an appropriately licensed facility. Wastewater is tested prior to removal from the premises to ensure that contaminant criteria are met.

The applicant also requests the flexibility to be able to accept uncontaminated scrap metal from other sources in addition to decommissioned offshore infrastructure for processing (resizing) through a variety of methods, including (but not limited to) oxy-cutting, plasma cutting and shearing. The types of scrap metals proposed to be accepted include:

- Machinery
- drill rods
- light gauge (mixed) scrap
- heavy gauge steel
- non-ferrous metals
- depolluted car bodies

Occasional night-time work is proposed for scrap metal processing to allow for hot works to be undertaken during cooler temperatures or to meet operational requirements. There are permanent light towers at the premises to enable work to be undertaken safely at night.

The premises relates to the categories and assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L2963/2025/1. 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 L2963/2025/1.

2.3 Compliance with Works Approval W6828/2023/1

On 27 March 2024, Dodd & Dodd Group Pty Ltd submitted an Environmental Compliance Report (ECR) for the premises in accordance with Condition 3 of W6828/2023/1, for the following infrastructure and equipment:

- Ground liner
- Portable and collapsable bunds
- Washdown area
- Waste items storage areas (contaminated)
- Waste items storage areas (decontaminated)
- NORM and mercury waste storage area
- Scrap metal processing area
- Fuel tank and refueling station

On 12 June 2024, Dodd & Dodd Group Pty Ltd, submitted a second ECR for the following infrastructure/equipment:

- Chemical cleaning station
- Wastewater treatment infrastructure

The above-mentioned ECRs noted some departures from the works approval requirements which were reviewed and accepted by the department on 31 July 2024. The departures were minor in nature and posed no increased risk to public health, public amenity or to the environment. Table 1 below outlines the changes that were made to the original design and construction requirements specified in Condition 1, Table 1, of W6828/2023/1.

Table 1: Departures from Condition 1 in Works Approval W6828/2023/1 (ECRs 1 and 2)

No.[1]	Infrastructure/ equipment listed in Condition 1	Departure
1	Ground liner	W6828/2023/1 requires these items of infrastructure/operational areas to be constructed over compacted in-situ soils, whereas they were constructed over a uniform layer of 100 mm thick road base. The department considers that the use of road base instead of compacted in situ soils does not change the outcome of the risk assessment.
6	Wastewater treatment infrastructure	
7	Waste items storage areas (contaminated)	
8	Waste items storage areas (decontaminated)	
3	Chemical cleaning stations	W6828/2023/1 requires the ground underlying these items of infrastructure to be 150 mm of clean compacted road base. These items are underlain by a uniform layer of 100 mm thick compacted road base. Compacted in-situ soil was proposed for the original design of the facility and in the original works approval application for the premises. Dodd & Dodd Group Pty Ltd requested the change to 150 mm road base from compacted in-situ soils in comments back to the department on their draft works approval for the premises. The department accepted this change as it did not alter the outcome of the risk assessment. The change from 150 mm to 100 mm thick road base still represents an improvement to the original compacted in-situ soils which was assessed by the department as being suitable. Therefore, this deviation does not increase the overall risk profile of the premises.
4	Automatic High Pressure Decontamination Facility (AHDF)	
5	Washdown area	
10	Scrap metal processing area	
11	Fuel tank and fueling station	
3	Chemical cleaning stations	W6828/2023/1 requires the chemical cleaning stations to be located within a bunded steel container on top of portable secondary bunds which are a minimum of 100 mm high. However, the chemical cleaning stations were constructed in rigid high-density polyethylene containers on top of 100 mm high portable secondary bunds. The cleaning stations were placed in polyethylene containers over steel as they offer more resistance to corrosion from the use of water and chemicals in the process. The department considers that the change still achieves the same environmental outcome.

No.[1]	Infrastructure/ equipment listed in Condition 1	Departure
6	Wastewater treatment infrastructure	W6828/2023/1 requires this item of infrastructure to be located within a bunded container on top of portable secondary bunds, a minimum of 300 mm high. However, the wastewater treatment infrastructure was located in 100 mm high collapsable bunds. The department considers the 100 mm height sufficient to contain leaks and spills, noting that the bunds are sized around the infrastructure to contain greater than 125% of the volume of the largest container stored.
7	Waste items storage areas (contaminated)	W6828/2023/1 requires storage racks to be located within portable secondary bunds which are a minimum of 300 mm high. The storage racks were constructed within collapsable bunds, 100 mm high. The 300 mm bunds were deemed too high for the pipe racks, leading to the possibility of the bunds being damaged. The 100 mm height was accepted by the department given that the bunds were sized around the containment infrastructure to contain more than 125% of the volume of the largest container stored.

Note 1:" No." refers to the row number of the infrastructure item in Condition1, Table 1 of Works Approval W6828/2023/1

On 10 February 2025, Dodd & Dodd Group Pty Ltd submitted a third ECR for the final remaining piece of infrastructure, the Automatic High Pressure Decontamination Facility (AHDF). The ECR noted some departures from the works approval requirements which have been reviewed and considered to be acceptable by DWER. Table 2 below outlines the changes that were made to the original design and construction requirements specified in Condition 1, Table 1, of W6828/2023/1.

Table 2: Departures from Condition 1 in Works Approval W6828/2023/1 (ECR 3)

No.[1]	Infrastructure / equipment listed in Condition 1	Departure
4	AHDF	W6828/2023/1 requires this item of infrastructure to be located within portable secondary bunds a minimum of 300 mm high. However, the AHDF has been located within a 100 mm high collapsable bund. The applicant has stated that the requirement for the AHDF to be in 300 mm high portable bunds was specified in error in the works approval application. The 100 mm height has been stated as being sufficient to contain leaks and spills noting that bunds are sized around containment infrastructure to be able to contain more than 125% of the volume of the largest container stored within the bunded area. The AHDF provides the primary containment bunding. The department considers the 100 mm height sufficient to contain leaks and spills, noting that the bunds are sized around the infrastructure to contain greater than 125% of the volume of the largest container stored.
		W6828/2023/1 requires the spray curtain to be constructed using 3 mm thick and 150 mm wide UV stabilised polyester strips. The installed curtains are 3.2 mm thick and 300 mm wide strips. The department considers that the increase in spray curtain width would not impact on their effectiveness.

Note 1:" No." refers to the row number of the infrastructure item in Condition1, Table 1 of Works Approval W6828/2023/1

Given the above, the department has determined that the requirements of Conditions 1, 2, and 3 of W6828/2023/1 have been met.

2.4 Environmental Incidents

The applicant notified the department of a discharge of waste to the environment under Section 72 of the EP Act on 30 October 2024. This was due to mercury contamination being identified on the premises in the compacted road base.

A site investigation was undertaken by the applicant and Radiation Professionals Australia (RPA) who undertake the decontamination activities on the premises. The investigation has now been closed out. However, the applicant has put in place the following corrective actions to prevent this issue from reoccurring:

- Using covers and foam plugs over the open ends of pipes and spool pieces to avoid mercury contaminated scale from spilling out of the pipes during transport around the premises.
- Transition stations placed at exits to key storage and operational areas for the cleaning of workers boots to prevent contaminants from being transferred from boots to other areas of the premises.

The corrective actions above have been included as applicant controls within the licence amendment application.

2.5 Other Approvals

2.5.1 Development Approval

Development Approval for the premises was granted by the Shire of Ashburton on 28 June 2023, reference no. 23-15.

2.5.2 Radiological Council

The premises are registered under the *Radiation Safety Act 1975* to store and handle objects with surface contamination of radioactive substances. Registration (No. RS 82/2024 39085) for the premises is held by Radiation Professionals Australia.

2.5.3 Dangerous Goods Licence

The applicant holds a Dangerous Goods Site Licence (Licence no. DGS023070), issued 13 December 2023, for the premises from the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) for the storage of 61 kL of sodium hydroxide solution and 18 kL of Environmentally Hazardous Substance, Liquid, N.O.S (MerCure mercury cleaning chemical). These chemicals are used for cleaning processes undertaken at the site.

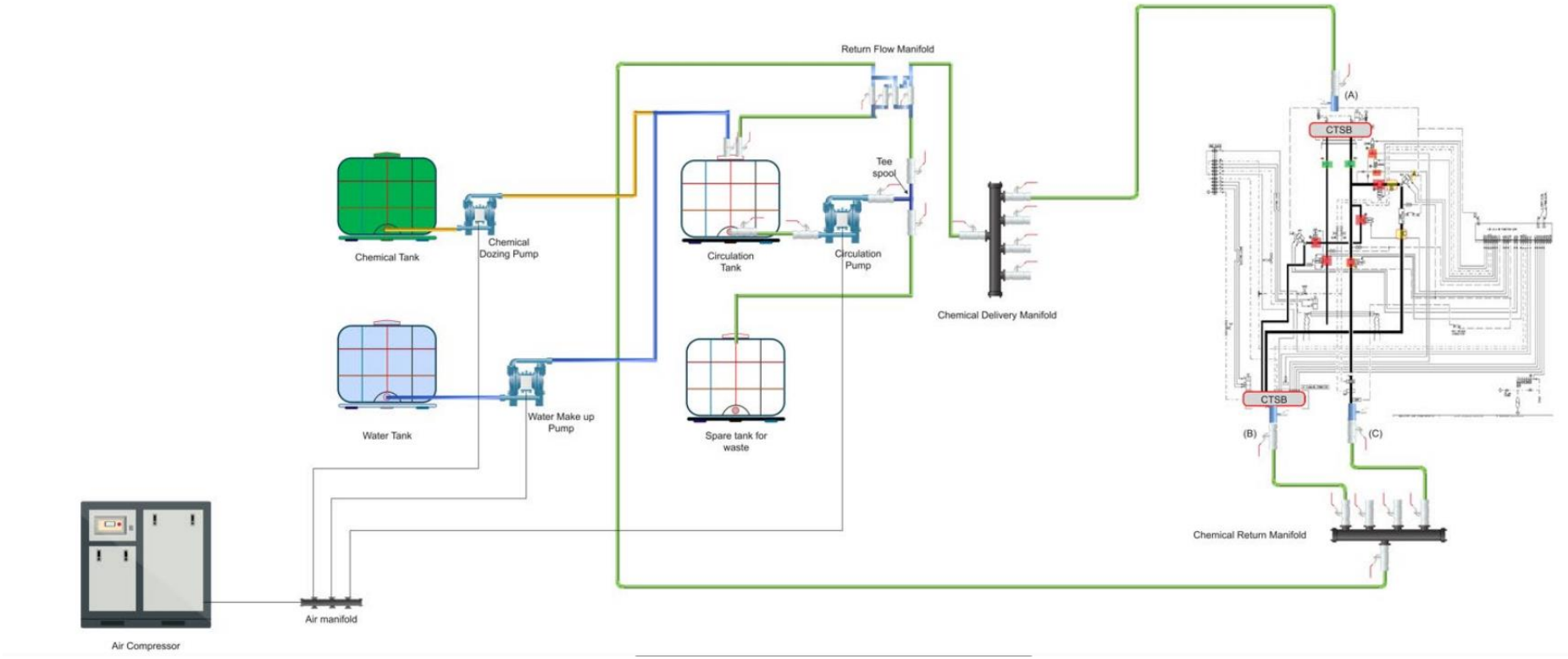

Figure 1: Example of in-situ cleaning of large structures

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 operation which have been considered in this decision report are detailed in Table 3 below. Table 3 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 3: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Contaminated stormwater Spills and leaks of contaminated material or chemicals	Acceptance, storage and handling of contaminated waste (NORM, BTEX, mercury etc.)	Overland runoff and or/seepage into soils	• Contaminated items are stored in bunded areas. • Bunding is regularly inspected to ensure integrity and capacity is maintained. • Rainwater contained in bunds is discharged only when no spills or leaks have occurred within the bunded area, with clean rainwater discharged to ground and contaminated water contained in IBCs for treatment on-site or removal off-site.
Dust containing mercury and other contaminants	Dispersal of contaminants via premises foot traffic and waste movements (surface soil contamination and fugitive dust lift off).	Air/windborne pathway	• Using covers and foam plugs over the open ends of pipes and spool pieces to avoid contaminated scale from spilling out of the pipes during transport around the premises. • Transition stations will be placed at exits to key storage and operational areas for the cleaning of workers boots to prevent contaminants from being transferred from boots to other areas of the premises.

Emission	Sources	Potential pathways	Proposed controls
Contaminated water sprays or mists	Decontamination of offshore structures	Air/windborne pathway	• Spray cover and curtains installed around AHDF Station. • Cowlings placed over ends of flexible and rigid piping during cleaning. • Wind direction and strength observed, and activities moderated according to conditions.
Mercury vapour			• Cleaning chemicals bind the mercury to prevent release of mercury vapour. • Mercury waste is stored in lined, sealed UN-rated drums in a lockable container. • Periodic mercury vapour monitoring around cleaning station and racks, and waste storage area.
Radon gas			• AHDF Station allows airflow to mitigate build-up of radon gas. • NORM waste stored in lined, sealed UN-rated drums in lockable containers. • Periodic external gamma surveys around storage containers. • Control limits and monitoring implemented through the Radiation Licence and Radiation Safety Management Plan.
Filtered industrial wash water containing contaminants or cleaning chemicals (IBCs, tanks and transfer hose)	Decontamination of offshore structures	Overland runoff and or/seepage into soils	• Wash water is filtered and reused for cleaning activities. • Excess water is stored in IBCs in bunded areas. • Bunding is regularly inspected to ensure integrity, and that capacity is maintained.
Contaminated stormwater			• Bunding is regularly inspected to ensure integrity and capacity is maintained. • Rainwater contained in bunds is tested prior to discharge; clean rainwater discharge to ground; contaminated water contained in IBCs for treatment on-site or removal off-site.
Direct discharge of liquid waste/wastewater			

Emission	Sources	Potential pathways	Proposed controls
Spills and leaks of environmentally hazardous materials (NORM, BTEX or mercury)	Storage of environmentally hazardous materials	Overland runoff and or/seepage into soils	• Drums are stored on portable bunds in a secure container with secondary bunding. • Regular inspection of drums for defects, leaks. • Personnel appropriately trained in handling drums. • Container floor contamination surveys carried out after each loadout.
Contaminated stormwater			• Bunding regularly inspected to ensure integrity and capacity is maintained. • Rainwater contained in bunds discharged only when no spills or leaks have occurred within the bunded area, with clean rainwater discharge to ground and contaminated water contained in IBCs for removal off-site.
Noise	Processing and storage of scrap metal	Air/windborne pathway	• Vehicles, equipment, and machinery regularly inspected and maintained, and operated effectively. • Operations will be undertaken at a significant distance to noise-sensitive receptors.
Contaminated stormwater		Overland runoff and or/seepage into soils	• Cleaned items certified as decontaminated prior to being processed. • Only clean, uncontaminated scrap metal accepted. • No more than 5,000 tonnes of scrap metal will be stored on site at any one time.
Smoke	Upset conditions (fire)	Air/windborne pathway	• No more than 5,000 tonnes of scrap metal will be stored on site at any one time.
Fire-fighting wash water		Overland runoff and or/seepage into soils	Nil provided

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 4 and Figure 22 below provides a summary of potential human and environmental receptors that may be impacted because of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental Siting* (DWER 2020)).

Table 4: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Pastoral stations and leases	Lands used for agricultural purposes (grazing) on Minderoo and Peedamulla station extend from ~3.2 km west and ~8 km north of the premises. Minderoo Station homestead is located ~20 km south-west of the premises. Peedamulla Station homestead and campground are located ~40km east north-east of the premises.
Proposed future industrial lot	Abutting the prescribed premises boundary to the west
Users of Conservation Park (existing and proposed)	Current: located approximately 32 km south-east. The proposed extension to the Cane River Conservation Park (CRCP) includes all lands surrounding the premises except easements associated with the Onslow Road and associated infrastructure. The boundary of the proposed extension to the CRCP is located between 150 and 1,500 m from the premises boundary
Environmental receptors	**Distance from prescribed activity**
Cane River Conservation Park (CRCP)	Current: located approximately 32 km south-east. Proposed extension: surrounding the premises, between approximately 150 m and 1,500 m from the PRWMF infrastructure. No management plan has been published for the existing or proposed extension to the CRCP. Consistent with section 56 of the CALM Act, the purpose of conservation parks is to conserve the natural environment, protect flora and fauna and preserve features of archaeological, historic or scientific interest while providing for suitable levels of public recreation.
Surface water bodies	A series of non-perennial lakes are situated to the west (down-gradient), south-west (up-gradient) and north-east (up-gradient) of the premises. The closest of these is located approximately 5.4 km west of the premises. Beyond these is a series of Saline Coastal Flats which extend towards the Indian Ocean. The Ashburton River is located approximately 20 km to the west of the premises, and the Cane River is located approximately 21 km to the north-east.
Indian Ocean	Approximately 40 km north-west (down-gradient) of the premises.

Groundwater: superficial and confined aquifers	The premises are located within the Carnarvon confined Birdrong aquifer and Carnarvon superficial aquifer. Talis (2018) reported that the superficial aquifer was not encountered during intrusive investigations at the premises. Depth to groundwater ranges across the premises from 5.4 metres below ground level (m BGL) (BH03 January 2018) to 20.9 m BGL (BH10 April 2019). Groundwater flows in a westerly/north-westerly direction beneath the premises to the Ashburton River and to the Indian Ocean. Groundwater-dependent ecosystems have not been investigated within the unallocated crown land surrounding the premises, proposed as an extension to the CRCP, for the purposes of the risk assessment they are assumed to be potentially present.
Users of groundwater resources	The premises are located within the RIWI Act proclaimed Pilbara Groundwater Area. The closest groundwater licences are a series of licences granted along the Onslow Road from ~7.7 km north-west (up-gradient) and ~1.8 km south-east (up-gradient) that are predominately granted to Main Roads Western Australia. Groundwater may also be used for stock water on nearby pastoral stations.

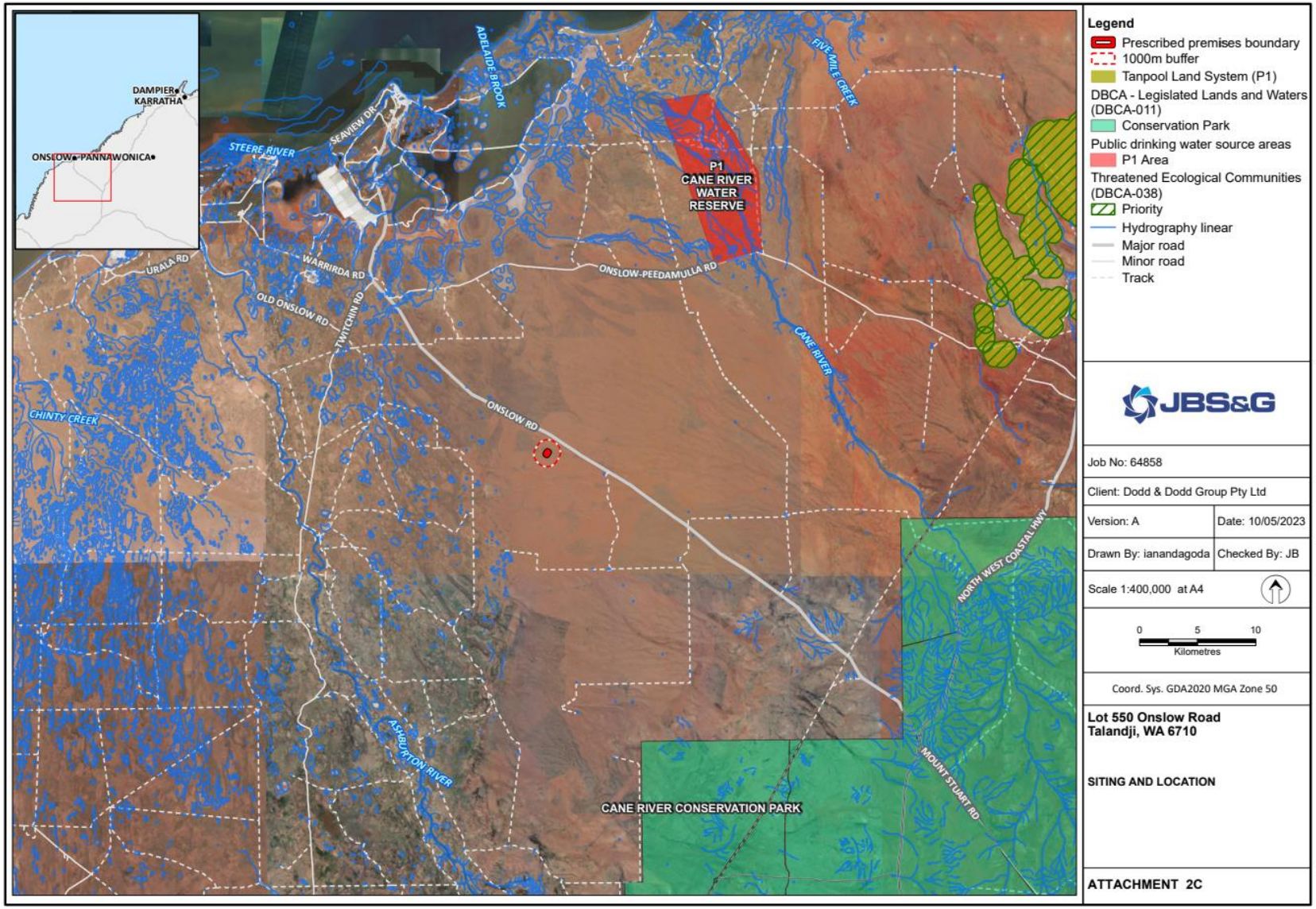

Figure 2: Distance to sensitive receptors

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and considers 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 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 5.

Licence L2963/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 5 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 5: Risk assessment of potential emissions and discharges from the premises during 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**				
Operation								
Acceptance, storage, and handling of contaminated wastes (NORM, mercury, BTEX etc.)	Contaminated stormwater	**Pathway:** overland runoff and or/seepage into soils **Impact:** Ecosystem disturbance or impact to surface water or groundwater quality	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 4, 5, 6, 7, 12, 13, 14	N/A
	Spills and leaks of contaminated material or chemicals	**Pathway:** Seepage through soils or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater quality	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 4, 5, 6, 7, 12, 13, 14	N/A
Dispersal of contaminants via premises foot traffic and waste movements (surface soil contamination and fugitive dust lift off).	Dust containing mercury and other contaminants	**Pathway:** Air/windborne pathway **Impact:** Human health	Users of the Cane River Conservation Park Future occupants of proposed industrial lots	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 8	N/A
Decontamination of wastes	Contaminated water sprays or mists	**Pathway:** Air/windborne pathway **Impact:** Human health	Users of the Cane River Conservation Park Future occupants of proposed industrial lots	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A
	Mercury vapour	**Pathway:** Air/windborne pathway **Impact:** Human health	Users of the Cane River Conservation Park Future occupants of proposed industrial lots	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	The applicant has a responsibility to comply with workplace exposure standards and current Occupational Health and Safety legislation to protect their workers from the risks of exposure to mercury vapour. Compliance with this legislation would also protect workers at adjacent industrial lots.
	Radon gas			Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A
	Filtered Industrial wash water or cleaning chemicals (IBCs, tanks and transfer hoses)	**Pathway:** seepage through soil or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A
	Contaminated stormwater			Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A

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**				
Decontamination of wastes	Direct discharge of liquid waste/wastewater	**Pathway:** seepage through soil or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A
Storage of environmentally hazardous materials	Spills and leaks of environmentally hazardous materials	**Pathway:** seepage through soil or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 8, 9, 10, 12, 13, 14	N/A
	Contaminated stormwater			Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 3, 8, 12, 13, 14	N/A
Processing and storage of scrap metal	Contaminated stormwater	**Pathway:** seepage through soil or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 8, 9, 10, 2, 13, 14	N/A
	Noise	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Users of the Cane River Conservation Park Future occupants of proposed industrial lots	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	Y	Condition 1	In relation to noise impacts from the premises to nearby future industrial lots, the applicant is required to comply with the *Environmental Protection (Noise) Regulations 1997.* There are no nearby noise sensitive receptors to be affected by the proposed night works.
Upset conditions (fire)	Smoke	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	Users of the Cane River Conservation Park Future occupants of proposed industrial lots	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	N	Conditions 2 **Conditions 8, 15, 16, 17**	The Delegated Officer considers it appropriate to specify a maximum stockpile size for scrap metal stored on the premises to ensure that it is stable, manageable, and easily accessible by firefighting vehicles in the event of a fire. A maximum height of 5 m and maximum width of 20 m has been specified within the licence as per the advice for external material stockpiles in *Guidance Note: GN04 Fire Prevention and Management in a Materials Recycling Facility* (DFES 2021) and *Guideline for stockpile management* (EPA South Australia 2010). The Delegated Officer also considers it appropriate for the licence holder to have a Fire and Emergency Management Plan in place to prevent and manage fires on the premises should they occur.

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**				
Upset conditions (fire)	Firefighting wash-water	**Pathway:** seepage through soil or overland runoff **Impact:** Ecosystem disturbance or impact to surface water or groundwater	Cane River Conservation Park Downgradient surface water bodies Beneficial users of groundwater	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Condition 1 **<u>Condition 19</u>**	The Delegated Officer considers it reasonable to stipulate controls for the management of firefighting wash-water on the premises within the licence in the unlikely event of a fire.

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. **<u>Bold and underlined text</u>** depicts additional regulatory controls imposed by the department.

4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 5 June 2025	None received	N/A
The Shire of Ashburton advised of proposal on 5 June 2025	None received	N/A
Dangerous Goods Safety Branch of the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) advised of proposal on 5 June 2025	None received	N/A
Radiological Council advised of proposal on 5 June 2025	None received	N/A
Applicant was provided with draft documents on 18 June 2025	The applicant provided comments on 23 June 2025. See Appendix 1	See Appendix 1

5. 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 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. Environmental Protection Authority (EPA) South Australia 2010, *Guideline for stockpile management (updated October 2020)*, Adelaide, South Australia
5. Department of Fire and Emergency Services 2021, *Guidance Note: GN04 Fire Prevention and Management in a Materials Recycling Facility*, Cockburn Central, Western Australia
6. Talis 2018, *Geotechnical Investigation DRAFT*, Peth, Western Australia

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
N/A	The applicant requested the commencement date of the licence to be 01/07/2025 to align with the start of the annual period as defined by the licence.	The Delegated Officer has agreed for the licence to commence on 01/07/2025.
Condition 1, Table 1, Row 1	Request that the specification is amended to "*(UV resistant, reinforced PVC or LLDPE)*." Note: it is assumed that PVS is a typo. LLDPE: Linear Low-Density Polyethylene. PVC: Polyvinyl chloride. Note: LLDPE typically has a higher UV resistance greater chemical resistance and durability.	The Delegated Officer has resolved to amend the condition as requested.
Condition 1, Table 1, Row 7	Request that requirement is changed to "*All wastewater generated from **washdown** activities must be contained within the washdown are*a." Wastewater from decontamination activities is managed through the wastewater treatment plants.	The Delegated Officer has resolved to amend the condition as requested.
Condition 2, Table 2, Row 1	Request that reference to '*Offshore*' is deleted. Whilst the current contracts for the premises are for offshore decommissioned infrastructure, items from the decommissioning of onshore assets may be accepted in the future. This would not change the activities carried out at the premises.	The Delegated Officer has resolved to amend the condition as requested as it does not change the risk assessment for the premises.
Condition 4	Request to change the condition to delete the reference to items '*known to have contained production liquids, gases or well service gas*' as this is overly restrictive, i.e., other potentially contaminating substances may have been involved.	The Delegated Officer has resolved to amend the condition as requested.
Conditions 5, 6, 8, 9, 10, 20 and 27	Request to delete reference to *"offshore".*	The Delegated Officer has resolved to amend the condition as requested.

Condition	Summary of applicant's comment	Department's response
Condition 5, Table 3, Row 4	Request change to trigger levels to the following to be consistent with Table 4 and 6: ≥ MDL (≥90 ppm) ≥ 2 µg/cm^2	The Delegated Officer has resolved to amend the condition as requested for consistency.
Condition 7, Table 4, Row 3	Request change to trigger level and clearance criteria to align with Tables 2,3, and 6. Request change to following to be consistent with Table 2 and 6: ≥ MDL (≥90 ppm) ≥ 2 µg/cm$_2$ Request change to following to be consistent with Table 3 and 6: < MDL (< 90 ppm) < 2 µg/cm$_2$	The Delegated Officer has resolved to amend the condition as requested for consistency.
Condition 11	The licence application requested removal of this condition as the facility authorised to accept the wastewater would define the criteria. If kept, the applicant requested to amend the wording to: "*The licence holder must not remove treated wastewater from the premises to an appropriate licensed facility for disposal unless the disposal contaminant criteria outlined in Table 7* ***or provided by the facility accepting the waste*** *have been demonstrated for that container of wastewater*."	The Delegated Officer considers it necessary for wastewater to be appropriately decontaminated prior to leaving the premises to ensure that potential contaminants, including mercury and NORM, are effectively managed at the source. As the licensed premises operates as a decontamination facility, the licence holder has both the capability and the responsibility to treat wastewater to a standard that meets defined environmental and health criteria. This approach ensures a consistent level of protection for the environment and public health, regardless of the receiving facility.

Condition	Summary of applicant's comment	Department's response
Table 11	Request deletion of definition for *"Offshore decommissioned infrastructure" and "production liquids, gases or well service gas"*.	Although the Delegated Officer has resolved to remove the word "offshore" from the term to also allow the acceptance of onshore decommissioned infrastructure, the Delegated Officer considers it necessary to define "decommissioned infrastructure" rather than deleting the definition completely. Therefore, the definition has been amended to reference "onshore" as well as "offshore" decommissioned infrastructure. The Delegated Officer considers it appropriate to remove the definition for "production liquids, gases or well service gas" as reference to this has been deleted from Condition 4.
Requested amendments to Decision Report		
N/A	The applicant has requested the removal of *"newly created industrial lots"*, abutting the prescribed premises boundary to the west, as a receptor. This is due to the industrial lots not having been created yet.	The Delegated Officer acknowledges that the industrial lots are proposed and have not been created yet. However, the Delegated Officer considers that as there are plans for future land releases, then this must be considered for transparency. The Delegated Officer has replaced "newly created industrial lots" with "proposed future industrial lots" to clarify that they have not been created yet.
N/A	The applicant has requested amending *"are generally contaminated by"* in dot point 2 in Section 2.2 of the Decision Report to *"can be contaminated by"* to clarify that not all items at the premises are contaminated by all contaminants (e.g. some items are only impacted with marine growth".	The Delegated Officer has resolved to amend the wording as requested.
N/A	The applicant has requested the removal of the dot point "The resizing of scrap metal items through oxy cutting and shearing during daylight hours only" from Section 2.2 of the Decision Report as the restriction to daylight hours has been removed from the licence.	The Delegated Officer acknowledges that the restriction to daylight hours has been removed from the licence. However, this particular dot point refers to activities which were permitted under the works approval (W6828/2023/1) and not to activities permitted under the licence.

Condition	Summary of applicant's comment	Department's response
N/A	The applicant requested an amendment to the information provided in Section 2.2 of the Decision Report in relation to removal of NORM contamination. Amendment requested from *"No chemicals are required as the NORM is in the form of barite particles which are insoluble"* to "*Chemical cleaning is typically not required as the NORM is deposited in the form of barite scales, which are chemically insoluble and amenable to high pressure water jetting. However, some softer barite scales are amenable to chemical cleaning, which may be used where high-pressure water jetting is not practicable.*"	The Delegated Officer has resolved to amend the wording as requested.
N/A	The applicant has requested correction of the date the first Environmental Compliance Report was submitted in Section 2.3 of the Decision Report.	Error corrected.
N/A	The applicant has requested correction to Section 2.5.3 of the Decision Report as "nickel oxide" was specified in error in the licence application. The 18 kL refers to 'environmentally hazardous substance liquid, n.o.s [not otherwise specified]' and not nickel oxide. The material is actually the MerCure mercury cleaning chemical.	Error corrected.