



Application for licence renewal

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

Licence Number	L5982/1994/12
Applicant	Jetstar Enterprises Pty Ltd
ACN	098 804 436
File number	2011/011415-2
Premises	Permapole – Mundijong 394 Robertson Road CARDUP WA 6122 Legal description – Part of Lot 60 on Diagram 59263 as depicted in Schedule 1 of the licence.
Date of report	25/07/2024
Decision	Licence granted

1. Decision summary

The delegated officer has determined to grant licence L5982/1994/12, which includes a review of the licence as part of the replacement process, to ensure the risks to human health and the environment from the treating of timber, as previously assessed by the department, have not materially changed.

Administrative amendments have been made which include an extension of the expiry date of the licence and an update to the current format. The delegated officer has determined to make material changes to the previous licence in accordance with *Guideline: Risk Assessments* (DWER 2020). New conditions that have been included on the licence are detailed in section 6.

This report documents changes made to the previous licence as part of the replacement process, pursuant to sections 62 and 62(A) of the *Environmental Protection Act 1986* (EP Act).

2. Purpose and scope of assessment

On 23 August 2023, Jetstar Enterprises Pty Ltd (licence holder) submitted an application for a licence renewal to the department under section 57 of the EP Act. This application was to replace the licence for Permapole – Mundijong (the premises), which was due to expire on 28 September 2023. Due to time constraints, the application was unable to be assessed by the department; therefore, the licence expiry date was subsequently extended by 12 months, to 28 September 2024, to allow for an assessment of the application and for additional information to be provided. Further information was provided by the licence holder on 15 February 2024.

The premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987*, which are defined in licence L5982/1994/12.

A review of the risks to human health and the environment from the treating of timber on the premises is detailed in section 6 of this report.

In replacing the licence, the department has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://www.wa.gov.au/service/building-utilities-and-essential-services/integrated-essential-services/dwer-regulatory-documents>.

3. Premises overview

The licence holder operates a timber treating facility near Mundijong, approximately 34 km SE of Perth. The facility was established in 1978 with the licence holder purchasing the business in 2003.

Raw pine logs are received onsite and stored within the timber landing area where they are kept damp via irrigation sprinklers to ensure the timber does not splinter during debarking.

The logs are then debarked by debarking machinery within the timber processing shed. Debarked timber is sent through another machine to smooth and round the logs and cut them to size. Saw dust and pine bark are stored onsite prior to being sold for offsite use such as animal bedding or as a garden product.

The logs are then treated with a copper chrome arsenate (CCA) solution inside an enclosed steel pressure cylinder. CCA concentrate (which is stored in a double skinned tank) is diluted with recycled water from the onsite pond and/or bore water as required and pumped into the pressure cylinder containing the logs. The process for the CCA solution to enter the logs takes approximately 10 minutes. Once the treatment is complete, excess solution is pumped out of the cylinder and into another tank.

The treated timber is then stacked in the curing shed, a concrete bunded hardstand covered

by a roof, to allow for the timber to cure and CCA fixation to occur. Any liquid that drains from the timber is directed to a central drainage pit that directs it back to the treatment plant area.

The cured timber is then stored on the premises within the treated stock area. This area contains drainage lines to direct any potentially contaminated runoff to the onsite pond. Water from the onsite pond is transferred to the treatment plant where it is reused in the treatment process. No wastewater is discharged offsite.

4. Part V of the EP Act

4.1 Compliance

Within the last 5 years there have been two complaints and two compliance activities recorded in the department's Incidents and Complaints Management System (ICMS) related to the premises.

Two complaints were received in November 2023 (ICMS 72376 and ICMS 72377) regarding dust and noise from the general direction of premises. Both complaints were related to the same source and were investigated together with officers from the department's noise branch attending the premises immediately south of Permapole. The investigation found that the majority of the dust was being generated due to the movement of vehicles and machinery across unsealed ground within the Permapole premises. The licence holder was issued with a letter of warning for the potential breach of existing licence condition 2.6.1 on 6 December 2023. One of the complainants made further contact with the department to state that they while they agree some dust is coming from Permapole, dust is also coming from the premises immediately south. This was noted on the department's ICMS.

Following an inspection in August 2020, two compliance activities (ICMS 58443 and 58639) were recorded in the department's system. These related to the production quantity for category 29 being omitted from the 2018-2019 annual audit compliance report, and wastewater runoff from the wetting of untreated logs being discharged to the environment. These were noted in the inspection report and a licence amendment, following a licence review, recommended for the discharge of the wastewater.

4.2 Annual Environmental Reports

The licence holder has reported in the last four annual environmental reports (AER) that:

- there were no failures or malfunctions of any pollution control equipment.
- no controlled waste material was removed.
- there was no discharge of potentially contaminated water and therefore, no monitoring was required.
- no complaints were received.

The licence holder reported that between 10,621 m³ and 12,260 m³ of timber was treated during each reporting period.

5. Consultation

Table 1 provides a summary of the consultation undertaken by the department.

Table 1: Consultation

Consultation method	Comments received
Application advertised on the department's website (7 March 2024)	No comments received.

Consultation method	Comments received
Local Government Authority advised of proposal (7 March 2024)	<p>Comments were received from the Shire of Serpentine-Jarrahdale on 27 March 2024. Comments included:</p> <p><i>Development approvals for the premises are as follows:</i></p> <ul style="list-style-type: none"> • <i>Impregnation plant and debarker for pine logs; small mill; kilns, planing machine and store (approved 1997).</i> • <i>Construction and installation of softwood sawmill and hammermill with waste storage bin (approved 1980).</i> • <i>New building for a sawmill and storage shed (approved 1983).</i> • <i>Construction shed for a treatment plant (approved 1985).</i> <p><i>The application indicates there is no monitoring point for leakage from the premises. Leakage might be occurring through the ground to groundwater as well as via surface water flows. Given the increasing density of urban development in the locality it is considered that monitoring should be occurring. There are increasing concerns in relation to the intensity of rainfall events and that the existing on site stormwater retention system may not be able to accommodate this. If the current system was to be overwhelmed, potentially toxic water will overland flow into sensitive receivers and impact on vulnerable communities. The Shire considers that the stormwater and wastewater management system onsite requires review.</i></p>
Licence holder was provided with draft documents on 10 July 2024.	Comments were received on 12 July 2024. The licence holder clarified some requested information including onsite procedures and infrastructure details. Information provided by the licence holder has been incorporated into the decision report and licence.

6. 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.

Table 2 describes the risk events associated with the operation of the premises, consistent with the *Guideline: Risk Assessments*. In accordance with this guideline, the delegated officer has excluded the employees, visitors, and contractors of the licence holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Where the licence holder has proposed mitigation measures/controls, these have been considered when determining the final risk rating. Where the delegated officer considers the licence holder'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 licence holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in the below table.

Licence L5982/1994/12 that accompanies this decision report authorises emissions associated with the operation of the premises. The conditions in the licence has been determined in accordance with *Guidance Statement: Setting Conditions* (DWER 2015).

Table 2: Risk assessment of potential emissions and discharges from the premises during operation

Risk events				Risk rating ¹ C = consequence L = likelihood	Reasoning	Regulatory controls
Sources / activities	Potential emissions	Receptors, pathway and impact	Licence holder controls			
Delivery and transfer of timber within the premises	Fugitive dust from vehicle and equipment movements	Air/windborne pathway causing impacts to health and amenity. Three residential premises (zoned rural residential) approximately 200 m W of the premises boundary. An additional 20 residential premises are approximately 200 – 650 m NW to SW of the premises boundary. Wind direction is mostly from E (ranging N to SE) at 9am throughout the year; mostly W and SW at 3pm in summer and NW to SW at 3pm in winter. Native vegetation, including threatened ecological communities (<i>Banksia</i> woodlands of Swan Coastal Plain), Green Growth commitments, Bushforever and Perth regional ecological linkage located immediately adjacent and within 250 m of the premises boundary.	<ul style="list-style-type: none"> Operating hours are from 6am to 6pm. GWL60205 is held to take up to 10,750 kL of groundwater for domestic use, irrigation of up to 0.5 ha of lawns and gardens, and timber processing. During dry and windy periods a water truck and sprinklers are used on gravel surfaces to limit dust. In the process of asphaltting internal gravel roads to limit dust and reduce reliance on water. Roads around the debarking shed, maintenance shed, and roads to the timber landing area, timber treatment, untreated and treated timber areas have been asphalted. Main asphalted driveway is swept fortnightly. 	C = Minor – low level impact to amenity and minimal impact to environment at a local scale L = Rare – may only occur in exceptional circumstances Low Risk	Dust emissions can have adverse impacts on human health and the environment (vegetation, soil and water quality) as well as amenity and social surroundings. Both fine and coarse dust particles can cause acute health effects (e.g. eye or breathing irritation) and also deposit on surfaces leading to soiling (DWER, 2021 and DoH, 2022). A letter of warning was issued in December 2023 for the potential breach of existing licence condition 2.6.1 due to dust being generated from the movement of vehicles and machinery on unsealed ground (see section 4.1). The licence holder has since commenced, and partially completed, asphaltting internal gravel roads to reduce dust emissions. Considering the above, the delegated officer does not reasonably foresee offsite impacts from fugitive dust from vehicle and equipment movement onsite and has assessed the risk as low. As licence holder controls have been considered in the risk assessment, they will be included on the licence as operational controls. Based on rainfall data for the area (Bureau of Meteorology) the delegated officer considers that fortnightly sweeping only needs to occur from October to April inclusive. Existing licence condition 2.6.1 will be removed from the licence as the condition is not clear or risk based. Substantive offences of the EP Act provide enforceable prohibitions for dust emissions that result in pollution or environmental harm.	Licence holder controls will be conditioned.
	Noise			C = Slight – Minimal impacts to amenity at a local scale L = Rare – may only occur in exceptional circumstances Low Risk	The delegated officer has considered the separation distance to receptors, licence holder controls and zoning of the premises and nearby residents (industrial development and rural residential respectively). There have been no substantiated complaints received by the department in relation to noise from the premises in at least the last 5 years. Given the above, the delegated officer does not reasonably foresee offsite impacts from noise from the delivery and transfer of timber on the premises impacting on nearby residential receptors. The Environmental Protection (Noise) Regulations 1997 (EP Noise Regulations) apply to noise emissions.	N/A
Debarking of timber, including wetting of timber in preparation of debarking	Fugitive dust	Air/windborne pathway causing impacts to health and amenity. Four residential premises (zoned rural residential) approximately 560 m W of the timber processing (debarking and cutting) shed and 630 m W of the timber landing area. An additional 9 residential premises are approximately 650 – 870 m NW to SW of the timber processing shed.	<ul style="list-style-type: none"> Operating hours are from 6am to 6pm. Untreated timber is kept moist in the timber landing area using sprinklers. Debarking of timber is carried out inside an enclosed shed. Dust extraction system directs sawdust to overhead bins. Bark stays in waste bin. Mulch stockpiled for daily pickup. 	C = Slight – minimal impacts to amenity at a local scale L = Rare – may only occur in exceptional circumstances Low Risk	The delegated officer considers that the separation distance between the source and potential receptors is sufficient. Considering this and licence holder controls, the delegated officer does not foresee offsite impacts of fugitive dust and noise from the wetting or debarking of timber and has assessed the risk as low. The EP Noise Regulations apply to noise emissions.	Licence holder controls (infrastructure) will be conditioned.
	Noise					
	Odour generated from tannin stained water and runoff containing sediments from wetting of timber in the timber landing area	Runoff containing tannin and sediments potentially impacting on nearby residential premises and native vegetation, including threatened ecological communities (<i>Banksia</i> woodlands of Swan Coastal Plain), Green Growth commitments, Bushforever and Perth regional ecological linkage located immediately adjacent and within 250 m of the premises boundary. Four residential premises (zoned rural residential) approximately 630 m W of the timber landing area and 200 m W of premises boundary. Approximately 11 licences to take water (groundwater) within 500 m of the premises boundary (mostly for private rural use).	<ul style="list-style-type: none"> Timber landing area has a compacted gravel base. Untreated timber is kept moist in the timber landing area using an irrigation system. Irrigation system (only used during the summer months) has a timing system to ensure that excessive wastewater is not produced. Irrigation system is managed during the summer months such that no run-off is generated. Any run-off is captured in the onsite pond. 	C = Minor – low level impact to amenity and minimal impact to the environment at a local scale L = Rare – may only occur in exceptional circumstances Low Risk	Complaints have been received by the department, prior to the reissue of the licence in 2014, of odour impacting nearby residents and residents concerned for the quality of water in their nearby groundwater bores. The quality of the wastewater was unknown. It was unclear whether runoff or potentially contaminated stormwater from other areas of the premises has the potential to enter the drainage line and be discharged from the premises. As a result, a condition to retain runoff (wastewater) from the log wetting area onsite was included on the licence issued in 2014 (based on licence holder commitments); however, following an inspection in August 2020, the department understood that this discharge may still be occurring. The department has not received any further complaints regarding the discharge of this runoff. The licence holder has clarified that they manage the irrigation system in the summer to ensure minimal run-off is generated, and any run-off that is generated from this area is retained onsite. Given the above, the delegated officer considers the risk of odour and runoff from the log wetting area impacting on nearby residents and native vegetation (including threatened ecological communities) to be a low risk. As the licence holder controls have been considered in the risk assessment,	Licence holder controls will be conditioned. <u>Existing licence condition</u> • Wastewater from the log wetting area to be retained onsite.

Risk events				Risk rating ¹	Reasoning	Regulatory controls
Sources / activities	Potential emissions	Receptors, pathway and impact	Licence holder controls	C = consequence L = likelihood		
					they will be included on the licence as operational controls.	
Storage of saw dust, bark and mulch from untreated timber	Fugitive dust	Air/windborne pathway causing impacts to health and amenity. Four residential premises (zoned rural residential) approximately 680 m W of the sawdust storage area. An additional 8 residential premises are approximately 780 – 940 m NW to SW of the sawdust storage area. Wind direction is mostly from E (ranging N to SE) at 9am throughout the year; mostly W and SW at 3pm in summer and NW to SW at 3pm in winter.	<ul style="list-style-type: none"> Sawdust is stored in overhead bins within the timber processing shed and removed when necessary. Bark is stored in waste bins and removed when necessary. Mulch is stored on a gravel hardstand in three sided concrete bays with open side facing SE for daily pickup or removed as required. No stockpiles are kept damp during windy conditions. 	C = Slight – minimal impacts to amenity L = Possible – could occur at some time Low Risk	The delegated officer considers that the distance between the source and potential receptors, taking into account licence holder controls, is sufficient and does not reasonably foresee impacts to amenity of the closest residential receptors from fugitive dust from the storage of saw dust, bark and mulch onsite. Substantive offences of the EP Act provide enforceable prohibitions for dust emissions that result in pollution or environmental harm.	Licence holder controls (infrastructure) conditioned.
Treatment and curing of timber (treatment plant and curing shed)	Odour	Air/windborne pathway causing impacts to health and amenity. Three residential premises (zoned rural residential) approximately 500 m W of the treatment plant and curing shed. An additional 9 residential premises are approximately 600 – 830 m NW to WSW of the treatment plant and curing shed.	<ul style="list-style-type: none"> No licence holder control specified. 	C = Slight – minimal impacts to amenity at a local scale L = Unlikely – probably not occur in most circumstances Low Risk	The delegated officer has considered the separation distance to receptors and zoning of the premises and nearby residents (industrial development and rural residential respectively). There have been no substantiated complaints received by the department in relation to noise or odour from the premises in at least the last 5 years. Given the above, the delegated officer does not reasonably foresee offsite impacts from noise or odour from the curing of timber on the premises impacting on nearby residential receptors. The EP Noise Regulations apply to noise emissions.	N/A
	Noise					
	Wastewater/runoff or potentially contaminated stormwater containing chemicals due to spillage, leakage or containment failure	Surface water or groundwater contamination. Stormwater drainage (roadside) is located 430 m W of treatment plant and curing shed. Native vegetation, including threatened ecological communities (<i>Banksia</i> woodlands of Swan Coastal Plain), Green Growth commitments, Bushforever and Perth regional ecological linkage located approximately 340 m W of treatment plant and curing shed. Approximately 11 active licences to take water (groundwater) within 500 m of the premises boundary (mostly for private rural use).	<ul style="list-style-type: none"> Timber is treated in steel tanks that can be pressurised. Four steel tanks, 3 x 57,000 L water tanks, 1 x 57,000 L working tank and 1 x 21,000 L concentrate tank are located on a concrete bunded area. Treatment tanks are located within a shed that is open two sides. Treatment fluid is made up of recycled wastewater from the pond and additional chemicals as required. A vacuum is applied to the timber at the end of the treatment process to remove any excess fluid (chemicals). Timber is stacked in a curing shed that has a bunded concrete slab with central drainage pit for a few days to allow timber to cure. Any wastewater collected is directed back to the treatment plant. Timber is stored in the curing shed for a minimum of 7 days during winter months and a minimum of 3 days during summer months. Maintenance occurs on a periodic basis. Diesel tank is located within a concrete bunded area to capture any leaks or spills. Dangerous goods licence DGS009321 for the storage of corrosive liquid and diesel fuel. 	C = Moderate – low level impacts to the environment on a local scale L = Unlikely – probably not occur in most circumstances Medium Risk	The delegated officer has considered the separation distance to receptors and licence holder controls and determined that the risk of wastewater containing chemicals impacting on nearby receptors is medium. As licence holder controls have been considered in the risk assessment, they will be included on the licence as operational controls. The licence holder has not specified what months they consider to be winter or summer. The delegated officer has considered temperature ¹ , relative humidity ¹ , rainfall ¹ , daily solar exposure ¹ and pan evaporation data ² and considers winter months to mean May to August inclusive and summer months to mean September to April inclusive. ¹ Data sourced from Bureau of Meteorology website – site number 009172 Jandakot Aero. ² Data sourced from Department of Primary Industries and Regional Development – Jarrahdale 1 (East) (JA001) and Jarrahdale 2 (South) (JA002)	<u>Existing licence conditions</u> <ul style="list-style-type: none"> CCA solutions are directed back to the collection sump via the graded concrete floor. Licence holder controls (infrastructure) will be conditioned.
Management of potentially contaminated stormwater from the storage of treated timber – treated timber area, HDPE lined	Runoff and seepage from treated timber area. Overtopping and/or seepage through liner of pond.	Runoff, potentially containing chemicals potentially impacting on surface water and infiltration to groundwater. Shire stormwater drain approximately 90 m W of premises boundary. Approximately 11 active licences to take water (groundwater) within 500 m of the premises boundary (mostly	<ul style="list-style-type: none"> A vacuum is applied to the timber at the end of the treatment process to remove any excess fluid (chemicals). Timber is then stacked in a curing shed for a minimum of 7 days during winter months and a minimum of 3 days during summer months to allow the timber to cure. Once cured, treated timber is stacked in the treated timber area (gravel hardstand) and any runoff drains to the HDPE lined pond. 	C = Moderate – low level offsite impacts at a local scale L = Unlikely – probably not occur in most circumstances Medium Risk	The delegated officer understands that potentially contaminated stormwater and runoff from the treated timber area is directed to the onsite HDPE lined pond, where wastewater is reused in the CCA treatment process and is no longer discharged offsite. The delegated officer has considered the separation distance to receptors and licence holder controls and determined that the risk of potentially contaminated stormwater and runoff from the storage of treated timber impacting on nearby receptors is medium. As the licence holder controls have been considered in the risk assessment,	<u>Existing licence conditions</u> <ul style="list-style-type: none"> Direct wastewater from the treated timber area to the onsite pond <u>Additional regulatory controls</u>

Risk events				Risk rating ¹ C = consequence L = likelihood	Reasoning	Regulatory controls
Sources / activities	Potential emissions	Receptors, pathway and impact	Licence holder controls			
pond and associated pump and pipework		for private rural use). Native vegetation, including threatened ecological communities (<i>Banksia</i> woodlands of Swan Coastal Plain), Green Growth commitments, Bushforever and Perth regional ecological linkage located immediately adjacent and within 250 m of the premises boundary	<ul style="list-style-type: none"> The pond is 1.8 m deep and has an approximate surface area of 1,083 m². A transfer pump is used to transfer the wastewater by a DN63HDPE pipe to the treatment plant where the wastewater is recycled and additional chemical added as required to start the treatment process. Maintenance / inspection occurs on a periodic basis to ensure that recycling of the wastewater occurs and the pond doesn't overflow. 		<p>they will be included on the licence as operational controls.</p> <p>Existing licence condition regarding the management of the pond to prevent overtopping will be replaced by a standard freeboard condition (and definition).</p> <p>The HDPE lined pond will be included in the infrastructure table on the licence which will require the licence holder to maintain the infrastructure, replacing the existing licence condition that stated for this to occur.</p> <p>Existing licence conditions regarding the discharge of wastewater from the pond offsite, including limits, will be removed from the licence as the wastewater is reused onsite.</p> <p>Additionally, a condition will be added to state that no discharge from the pond offsite may occur.</p>	<ul style="list-style-type: none"> Standard freeboard condition and definition added to licence. No discharge to the environment from the HDPE lined pond.
Storage of timber in the timber landing area, treated timber area and the untreated stock area.	Dust/particulates, toxic air emissions, contaminated fire water runoff, odour from smoke/air toxics in the event of a timber fire	<p>Air/windborne pathway causing impacts to health and amenity.</p> <p>Three residential premises (zoned rural residential) approximately 200 m W of the premises boundary. An additional 20 residential premises are approximately 200 – 650 m NW to SW of the premises boundary.</p> <p>Contamination of soil within the premises and infiltration to groundwater or runoff to surface water.</p> <p>Native vegetation, including threatened ecological communities (<i>Banksia</i> woodlands of Swan Coastal Plain), Green Growth commitments, Bushforever and Perth regional ecological linkage located immediately adjacent and within 250 m of the premises boundary.</p>	<ul style="list-style-type: none"> Untreated timber is stacked within a 42,000 m² area (untreated stock area) at a maximum height of 2.6 m. Treated timber is stacked within a 10,000 m² area (treated timber area) at a maximum height of 1.8 m. Treated timber storage areas are on gravel hardstand that drain to a HDPE lined pond. 	<p>C = Major – frequent medical treatment</p> <p>L = Rare – may only occur in exceptional circumstances</p> <p>Medium Risk</p>	<p>A bushfire in February 2022 partially destroyed a similar timber treating facility that is licensed by the department under the EP Act. CCA treated timber was burnt releasing ash and smoke particles into the air and leaving large rows of ash on the site.</p> <p>Following the events of this bushfire, the delegated officer has included a risk assessment of a fire event at the premises impacting on nearby receptors at the premises.</p> <p>In the event of a fire, the ash from burnt CCA treated timber can contain up to 10% (by weight) arsenic, chromium and copper. Ash particles can irritate the eyes, nose and throat (DoH 2023). Ingesting even small amounts of this ash can be harmful, potentially causing nausea, vomiting and diarrhoea. (DoH, Victoria 2012).</p> <p>Runoff from water used to suppress a fire within the treated timber area (where the wastewater is most likely to be contaminated with CCA chemicals) would be directed to the onsite HDPE lined pond (see row above for risk assessment of potentially contaminated stormwater within this area).</p> <p>There is also potential for direct contamination of soils following a fire event.</p> <p>The delegated officer has considered the above, and licence holder controls, and has determined that the risk of a fire event impacting on nearby receptors is medium. It is noted that the risk rating is based on a worst-case scenario consequence (long term health impacts) of an extremely rare risk event (ignition of timber).</p> <p>Conditions will be included on the licence relating to the prevention of fire, minimisation of the extent if a fire does occur, and the provision for effective response to a fire. This includes conditions relating to the size of individual stacks and separation distance between stacks.</p> <p>The licence holder has not provided information on the size of individual timber stacks; therefore, the delegated officer has determined (based on aerial data from July 2024) that the maximum untreated and treated timber stack area will be 100 m². The delegated officer considers 3 m between stacks to be an adequate distance to allow machinery and/or fire fighting vehicles to access each timber stack and, in the event of a fire, minimise the spread to other timber stacks. The height of individual stacks has been conditioned based on licence holder controls.</p> <p>Additional conditions relating to fire prevention equipment being readily available, ensuring the position of stacked timber does not hinder effective response in the case of a fire; and the rapid clean-up of fire water and contaminated soil.</p>	<p><u>Additional regulatory controls</u></p> <ul style="list-style-type: none"> Storage of untreated and treated timber for fire prevention purposes. Minimisation of the extent if a fire does occur. Provision for effective response to a fire.

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

7. Decision

Based on the assessment in this decision report, the delegated officer has determined that a renewed licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements. The delegated officer's reasoning and regulatory controls can be found in Table 2, with additional comments below.

Expiry date of the licence

The department's *Guidance Statement: Licence duration* (DWER 2016) allows for longer term licences of up to 20 years' duration. As per the guidance statement, in determining the licence duration, the department will consider the duration of other statutory approvals, the level of risk of harm to public health and the environment posed by the premises, matters relevant to the efficient operation of the licensing regime, and any other matters the department considers relevant. The delegated officer understands that the licence holder holds a lease for occupancy of the land, which expires on 22 June 2027. Due to the existing annual licence fee period, the expiry date of the licence has been determined to be 28 September 2026, prior to expiry of the lease. The licence holder may apply for a licence amendment to extend the expiry date of the licence following the arrangement of a new lease agreement or an extension of the existing lease.

7.1 Summary of amendments

Table 3 provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated in the revised licence as part of the replacement process.

Table 3: Summary of licence amendments

Existing licence condition	Licence amendment condition	Description
Front page	Front page	Duration of licence updated, with expiry date extended. Category 29 assessed production capacity wording updated to clarify "of timber preserved".
1.1.3	-	Reference to Australian or other standards This condition has been removed from the licence. Any reference to standards are specified within the conditions of the licence and defined within the definitions of the licence.
1.1.4	-	Reference to guideline or code of practice This condition has been removed from the licence. No guides or codes of practices are referenced within the licence.
1.2.1	-	Emissions not mentioned in licence This condition has been removed from the licence. Any discharges or emissions that are authorised are specified in the licence.
1.2.2	1, Table 1	Pollution control and monitoring equipment This condition has been removed from the licence. Condition 1 in the revised licence specifies infrastructure and equipment that must be maintained in good working order and operated in accordance with the corresponding operational requirements.
1.2.3 and 1.2.4	-	Environmentally hazardous materials This condition has been removed from the licence. The storage and handling of dangerous goods are subject to the requirements of the <i>Dangerous Goods Safety Act 2004</i> and associated codes of practice and standards, which are implemented by the Department of Energy, Mines, Industry Regulation and Safety. Spills can be managed under the general provisions of the EP Act and associated regulations.

Existing licence condition	Licence amendment condition	Description
1.2.5	-	Stormwater This condition has been removed from the licence. Condition 1 in the revised licence specifies infrastructure. Potentially contaminated stormwater can be managed under the general provisions of the EP Act and associated regulations.
1.2.6, 4.1.2 IR2	Front page, Schedule 1: Maps	Permanent boundary markers These conditions have been removed from the licence. The licence holder has supplied GPS coordinates for the SE and SW corner of the premises (for the southern boundary where there is no cadastral boundary). The premises boundary is shown in the map in schedule 1 of the revised licence.
1.3.1	1, Table 1	Containment of contaminated and potentially contaminated stormwater Onsite pond has been added to the infrastructure table with operational requirements specified in the revised licence.
1.3.2	1, Table 1	Management of the pond Infrastructure in Table 1 must be maintained. Freeboard condition has been added to replace the existing licence condition regarding ensuring overtopping does not occur (see Table 2).
1.3.3	1, Table 1	Management of wastewater Operational requirements for infrastructure at the premises is outlined in Table 1 of the licence, with conditions explained in Table 2.
2.1.1	-	Recording exceedances This condition has been removed from the licence as there are no limits or targets specified in the licence.
2.2, 2.4, 2.5, 2.8, 3.2, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9	-	Descriptors stating "no specified conditions" have been removed from the licence.
2.3.1, 2.3.2, 3.1.1, 3.1.2, 3.3.1	-	Point source emissions to surface water, including limits and monitoring There is no discharge of contaminated or potentially contaminated wastewater from the premises authorised in the revised licence; therefore, these conditions have been removed. See Table 2 for further information.
2.6.1, 2.7.1	-	Fugitive dust emissions and odour emissions These conditions have been removed from the licence as they are generic and not specific.
4.1.1, 4.1.2 IR1	-	Improvement conditions relating to the Environmental Action Plan (2014). These conditions have been removed as they are not specific or risk based.
	1, Table 1	Existing infrastructure at the premises and existing licence holder controls and operational requirements have been added to the licence. Additional requirements are specified in Table 2, which include a standard freeboard condition (and definition) and management of timber stacks for fire prevention purposes and provision for effective response to fire.
5.1.1	4, 5	Information, books and records standard conditions.
5.1.2	-	Condition has been removed as it is not a standard condition in the updated licence format.
5.1.3	3	Updated AACR condition to most recent format.
5.1.4	2	Updated complaints condition to most recent format.
5.2.1, 5.2.2	6	Removed AER condition as there is no monitoring required within the licence. Condition 6 has been included in the licence to ensure the licence holder keeps records of any controlled waste removed from the premises.
5.3.1	-	Notification of breach of limits No limits are specified in the licence; therefore this condition has been removed.

Existing licence condition	Licence amendment condition	Description
Schedule 1: Maps	Schedule 1: Maps	Premises map has been updated with licence holder supplied GPS coordinates and to show the location of the main infrastructure.
Schedule 2, Form N1	-	Removed from the licence as they are not required.

References

1. Bureau of Meteorology website, *Monthly climate statistics – Jandakot Aero (site number 009172)*, available from www.bom.gov.au. Accessed in July 2024.
2. Department of Health (DoH), 2022. *Health effects of dust*. Government of Western Australia - Department of Health - Health WA website, available from: www.healthywa.wa.gov.au/Articles/F_I/Health-effects-of-dust. Accessed in May 2024.
3. Department of Health (DoH), 2023. *Cleaning-up ash from CCA treated timber*. Government of Western Australia - Department of Health - Health WA website, available from: https://www.healthywa.wa.gov.au/Articles/S_T/Stay-safe-around-copper-chrome-arsenate-treated-wood/Cleaning-up-ash-from-CCA-treated-timber. Accessed in June 2024.
4. Department of Health, State Government of Victoria, 2012. *Copper chrome arsenic (CCA) treated timber – Better Health Channel website*, available from: www.betterhealth.vic.gov.au/health/healthyliving/copper-chrome-arsenic-cca-treated-timber. Accessed in June 2024.
5. Department of Primary Industries and Regional Development Weather Stations website, *Jarrahdale 1 (East) (JA001) and Jarrahdale 2 (South) (JA002)*, available from <https://weather.agric.wa.gov.au>. Accessed July 2024.
6. Department of Water and Environmental Regulation (DWER), 2015. *Guidance Statement: Setting Conditions*. Perth, Australia.
7. DWER, 2016. *Guidance Statement: Licence duration*. Perth, Australia.
8. DWER, 2016. *Guideline: Environmental Siting*. Perth, Australia.
9. DWER, 2019. *Guideline: Industry Regulation Guide to Licensing*. Perth, Australia.
10. DWER, 2020. *Guideline: Risk Assessments*. Perth, Australia.
11. DWER, 2021. *Draft Guideline: Dust emissions*. Perth, Australia.
12. NSW Government, 2019. *Bush fire recovery information – Copper chrome arsenate (CCA) – burnt timber and ash*. Available at: https://www.tenterfield.nsw.gov.au/content/uploads/2020/03/IECU-Fact-Sheet-Bush-Fire-Recovery-CCA-Timber_Oct-19.pdf. Accessed June 2024.