



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Solenis Australia Pty Ltd

Licence: L6728/1993/13

Registered office: 1612 – 1624 Centre Road
SPRINGVALE VIC 3171

ACN: 169 325 151

Premises address: Solenis Australia - Kwinana
9 Leath Road
KWINANA WA 66167
Being Lot 9500 on Plan 73740

Issue date: Monday, 13 July 2015

Commencement date: Thursday, 16 July 2015

Expiry date: Sunday, 15 July 2030

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by:

Peter Johns
Licensing Officer

Decision Document authorised by:

Chris Malley
A/Manager, Process Industries



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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.4, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.4, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions is justified in Section 4 of this document.

Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.



2 Administrative summary

Administrative details									
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>								
Activities that cause the premises to become prescribed premises	<table border="1"> <thead> <tr> <th>Category number(s)</th> <th>Assessed design capacity</th> </tr> </thead> <tbody> <tr> <td>31</td> <td>14 000 tonnes per annual period</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Category number(s)	Assessed design capacity	31	14 000 tonnes per annual period				
	Category number(s)	Assessed design capacity							
	31	14 000 tonnes per annual period							
Application verified	Date: 18 June 2015								
Application fee paid	Date: 1 July 2015								
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>								
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>								
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								
Commercial-in-confidence claim outcome									
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>								
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Ministerial statement No: EPA Report No:								
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>								
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>Environmental Protection (Kwinana) (Atmospheric Wastes) Policy 1999;</i> <i>Environmental Protection (Kwinana) (Atmospheric Wastes) Regulations 1992;</i> and <i>State Environmental (Cockburn Sound) Policy 2005.</i>									
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								



3 Executive summary of proposal and assessment

The Solenis Australia facility is located on part of Lot 9500 on Plan 73740 in Leath Road Kwinana Beach. The Part of the lot leased by Solenis Australia is approximately 59 000 m². The nearest residence is in Naval Base approximately 800 metres away.

Solenis Australia Kwinana principally manufactures flocculants, dispersants and anti scalants used in the mining industry, and concrete additives and accelerants. There are two manufacturing lines mixing and producing liquid products and a third which handles dry product with a bagging area.

Isothermal solution polymerisation is carried out in a reaction vessel at slightly elevated temperatures, from which products are pumped to a holding tank.

Powder products are produced when chilled monomer is mixed with a redox initiator under a nitrogen atmosphere forming a gel. The gel is dried and then ground and passed to a storage hopper for bagging.

Admixtures are produced when liquid raw materials are mixed in an indoor mixing vessel which directs to a tank farm from which products are loaded directly to road tankers or IBCs.

The potential environmental impacts from the site include:

- Emissions to air including oxides of nitrogen, particulate matter, acrylamide, acrylic acid and other VOCs.
- Odours from the chemicals involved in production.

As part of this Licence reissue, DER has amended the licence to update it into the new template. DER has not re-assessed the acceptability or impacts of emissions and discharges from the Premises or re-visited any existing emission control levels.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE				
Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.3-1.2.4	OSC	SC 1.2.3 replaces condition W3(a) and W3(b) of the previous licence SC 1.2.4 replaces condition W3(c) of the previous licence	Application supporting documentation
Premises operation	L1.3.1	NSC	NSC 1.3.1 replaces conditions A1, W1(a),W1(b) and W2 of the previous licence	N/A
Emissions general	L2.1.1	OSC	Descriptive limits have been set through condition 2.6.1 of the licence and therefore OSC regarding recording and investigation of exceedances of limits or targets has been included.	N/A
Point source emissions to air including monitoring	N/A	N/A	The previous licence did contain conditions relating to point source emissions to air. DER has not reassessed point source emissions to air as part of this reissue.	N/A
Point source emissions to surface water including monitoring	N/A	N/A	There are no point source emissions to surface water from the premises.	Applicant supporting documentation and DER inspection reports.



DECISION TABLE				
Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to groundwater including monitoring	N/A	N/A	There are no point source emissions to groundwater water from the premises.	Applicant supporting documentation
Emissions to land including monitoring	N/A	N/A	There are no emissions to land from the premises.	Applicant supporting documentation
Fugitive emissions	2.6.1	OSC	OSC 2.6.1 replaces condition A2(c) of the previous licence. SC 1.2.2 replaces conditions A2(a) and A2(b) of the previous licence.	N/A
Odour	N/A	N/A	Odour has not been reassessed as part of this amendment. As the previous licence did not impose controls on odour, no specified conditions have been included in this section. SC 1.2.1 prevents the licensee from causing an unreasonable emission.	General provisions of the <i>Environmental Protection Act 1986</i> .
Noise	N/A	N/A	Noise has not been reassessed as part of this amendment. As the previous licence did not impose controls on noise, no conditions have been included in this section. The <i>Environmental Protection (Noise) Regulations 1997</i> and SC 1.2.1 apply.	<i>Environmental Protection (Noise) Regulations 1997</i> General provisions of the <i>Environmental Protection Act 1986</i> .
Monitoring general	N/A	N/A	There is no requirement for general monitoring conditions.	N/A



DECISION TABLE				
Licence section	Condition number W = Works Approval L= Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Monitoring of inputs and outputs	N/A	N/A	Monitoring of inputs and output requirements have not been reassessed as part of this amendment. As the previous licence did not require monitoring of inputs and outputs no conditions have been included in this section.	N/A
Process monitoring	N/A	N/A	Process Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require process monitoring no conditions have been included in this section.	N/A
Ambient quality monitoring	N/A	N/A	Ambient Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require ambient quality monitoring no conditions have been included in this section.	N/A
Meteorological monitoring	N/A	N/A	Meteorological Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require meteorological monitoring no specified conditions have been included in this section.	N/A
Improvements	N/A	N/A	There are no improvement conditions in this licence.	
Information	L5.1.1-5.1.4 L5.2.1 L5.3.1	SC	SC5.1.3 and SC5.2.1 replace Condition G1 of the previous licence SC5.2.1 includes a throughput reporting requirement that was not part of the previous licence. Provision of this information in the annual report will inform DER on the various manufacturing processes on site, enabling further assessment of potential risks as required.	
Licence Duration	N/A	N/A	This licence has been classed as moderate risk and will be issued for 3 years.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
06/07/2015	Application advertised in West Australian (or other relevant newspaper)	No Comments Received.	Not Applicable



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High