



Licence Number	L6728/1993/13
Licence Holder	Solenis Australia Pty Ltd
ACN	169 325 151
File Number:	2010/005557-2
Premises	Solenis Australia - Kwinana 9 Leath Road KWINANA BEACH WA 6167 Part of Lot 9501 on Plan 407767
Date of Report	17/03/2020
Status of Report	Final

Definitions and interpretation

Definitions

In this Amendment Report, the terms in Table 1 have the meanings defined.

Table 1: Definitions

Term	Definition
AACR	Annual Audit Compliance Report
ACN	Australian Company Number
Amended Licence	the amended Licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report.
Amendment Report	refers to this document
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer of the Department. “submit to / notify the CEO” (or similar), means either: Director General Department administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 Joondalup DC WA 6919 or: info@dwer.wa.gov.au
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Works Approval issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Amendment
Licence Holder	Solenis Australia Pty Ltd
Premises	refers to the premises to which this Amendment Report applies, as specified at the front of this Amendment Report.
Risk Event	as described in <i>Guidance Statement: Risk Assessment</i>

Licence Amendment

The amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend Licence L6728/1993/13 granted under the EP Act for the Solenis Australia Pty Ltd chemical manufacturing plant in Kwinana Beach.

Details of the amendment are set out in the form of an amended licence.

The Licence Holder applied to amend the Licence on 18 December 2019 (the Application) to change the throughput on the premises from 14,000 tonnes to 17,000 tonnes per year.

The following guidance statements have informed the decision made on this amendment:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Decision Making (June 2019)*
- *Guideline: Industry Regulation Guide to Licensing (June 2019)*

Background

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; and
- Odours from the chemicals involved in production.

These potential emissions are controlled by ensuring all liquid chemicals are mixed in enclosed vessels and stored in enclosed tanks. Any spills are immediately cleaned up and all dry materials processing occurs within an enclosed building.

Amendment description

Table 2 lists the documents submitted during the assessment process.

Table 2: Documents and information submitted during the assessment process

Document/information description	Date received
Licence amendment application (DWER records A1852984 and A1854710)	18 December 2019 and 23 December 2019

The amendment requested by the Licence Holder is as follows:

1. Increase the premises throughput from 14,000 tonnes to 17,000 tonnes per annual period.

Amendment history

Table 3 provides the licence history for L6728/1993/13.

Table 3: Recent Licence history

Instrument	Issued	Description
L6728/1993/12	12/07/2012	Licence Reissue
L6728/1993/13	13/07/2015	Licence Reissue and template update
L6728/1993/13	27/02/2019	Transfer from BASF Pty Ltd to Solenis Australia Pty Ltd
L6278/1993/13	17/3/2020	Amendment application to increase approved production throughput from 14,000 to 19,000 tonnes per year.

Risk assessment

The decision document for Licence L6728/1993/13 issued 13 July 2015 (Appendix 2), assessed the risk of impacts from premises.

The Licence Holder has advised increase to throughput will be achieved by incremental improvements and that no additional infrastructure is required and additional operating hours are not required.

There are no authorised point source emission points from the premises.

There have been no complaints relating to the facility in the time Solenis has been the occupier.

The Delegated Officer has determined the increase to the throughput does not change the emissions or risk profile for the premises and no further assessment or controls are required.

The most recent AACR reported a production of 17,107 tonnes, which marginally exceeds the proposed throughput. The Delegated Officer has determined that the assessed throughput should be 19,000 tonnes. This will allow the Licence Holder to increase production throughput as requested while maintaining some operational flexibility and ensuring marginal volumes processed over the requested 17,000 tonnes per year will not result in a non-compliance with approved throughput.

The Delegated Officer has determined that the current Licence controls are appropriate to manage the risk from the increase to throughput at the premises

Decision

The Licence has been amended to include:

1. changes to increase the assessed throughput for chemical manufacturing on the premises from 14,000 tonnes to 19,000 tonnes;
2. minor formatting changes;
3. update of premises description as a result of changed cadastral details;
4. removal of redundant conditions; and
5. updated premises boundary map and boundary co-ordinates.

In accordance with section 59 of the EP Act, the Delegated Officer has granted amendments to Licence L6728/1993/13. Details of the amendments are set out in the

form of an Amended Licence.

Licence Holder's comments

The draft Amendment Report and the draft Amended Licence were sent to the Licence Holder for comment on 11 February 2020 and the Licence Holder replied on 12 March 2020 that they were satisfied with the draft Amended Licence

Chris Malley
A/Manager, Process Industries
An officer delegated by the CEO under section 20 of the EP Act

Appendix 1: Key documents

	Document title	In text ref	Availability
1.	Licence L6728/1993/13	L6728/1993/13	accessed at www.dwer.wa.gov.au
2.	Decision Document for Licence L6728/1993/13	Decision Document	Appendix 2 to this document
3.	Application for amendment to licence L6728/1993/13	Application	DWER records (DWER records A1852984 and A1854710)
4.	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	N/A	accessed at www.dwer.wa.gov.au
5.	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.		
6.	DER, May 2016. <i>Guidance Statement: Publication of Annual Audit Compliance Reports</i> . Department of Environment Regulation, Perth.		
7.	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.		
8.	DWER, June 2019. <i>Guideline: Decision Making</i> . Department of Water and Environmental Regulation, Perth.		
9.	DWER, June 2019. <i>Guideline: Industry Regulation Guide to Licensing</i> . Department of Water and Environmental Regulation, Perth.		