



Application for Licence Amendment

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

Licence Number	L6794/1992/9
Licence Holder	Visy Board Proprietary Limited
ACN	005 787 913
File Number	DEC6544/1
Premises	Visy Board O'Connor 49 Peel Road O'CONNOR WA 6163 Legal description – Lot 50 on Deposited Plan 78224 As defined by the Premises map attached to the Revised Licence
Date of Report	12 July 2023
Decision	Revised licence granted

Amine Fisher
A/Manager Process Industries

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

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1. Decision summary

Licence L6794/1992/9 is held by Visy Board Proprietary Limited (Licence Holder) for Visy board O'Connor (the premises), located at 49 Peel Road O'Connor.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the Premises. As a result of this assessment, Revised Licence L6794/1992/9 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment 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

On 11 November 2022, the Licence Holder submitted an application to the department to amend Licence L6794 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendment being sought is an increase in the assessed production capacity for cardboard manufacturing on the premises from 40,000 tonnes to 60,000 tonnes per annum.

The premises cardboard packaging manufacturing plant has achieved increased production exceeding 40,000 tonnes per annum since financial year 2018. The main discharge from the premises is ink-contaminated wastewater from cleaning of printing equipment in the plant and starch from the corrugator. The wastewater (and a portion of premises stormwater) undergoes preliminary treatment by a wastewater treatment plant (WWTP) (activated sludge) prior to being discharged to sewer under a trade agreement with Water Corporation.

The licence holder advised that the premises production increase has been achieved without compromising the capability of the WWTP. Efficiency gains through better management of chemicals use have reduced the wastewater production per tonne of product therefore there has not been a significant increase in the overall volume of wastewater produced. Additionally the WWTP has sufficient capacity for expected wastewater volumes associated with increased production up to 60,000 tonnes per annum.

Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed production capacity changes

Category	Current production capacity	Proposed production capacity	Description of proposed amendment
30 - Pulp paper or paperboard manufacturing	40,000 tonnes per annum	60,000 tonnes per annum	An increase in production capacity without additional works to reflect projected increase in production and efficiency gains by close management of chemicals reducing the trade waste production per tonne of product.

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 Amendment Report are detailed in Table 2 below. Table 2 also details the control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Contaminated wastewater (primarily with ink and starch)	Manufacture and printing of cardboard (primarily from cleaning equipment).	Direct discharge	<p>Preliminary treatment via a WWTP prior to discharge as trade waste to Water Corporation sewer.</p> <p>The WWTP has a 50,000 L collection tank capacity and treatment capacity of 7 kL/hr.</p> <p>The WWTP is contained within three separately bunded areas with total storage capacity of 31.4 m³.</p> <p>In the event of overflow from the tanks to the containment bunds, or malfunction of the WWTP, water will be removed by a licensed waste contractor for disposal to a licensed liquid waste facility.</p>
Solid waste (screenings and filter cake)	Pulp from belt press in WWTP.	Direct discharge	Collection in bins and transport off site to licenced landfill facility.
Odour	WWTP	Air/windborne pathway	<p>Chemical application to the effluent water is monitored daily and at regular intervals, and additional chemical dosing is conducted as required.</p> <p>The WWTP operator conducts daily checks at various intervals to check pH and dosing requirements and adjust if required.</p> <p>A tin tank lid covers the WWTP storage tank and assists in odour control.</p>
Noise	Operation of cardboard packing manufacturing plant	Air/windborne pathway	<p>Manufacturing plant is enclosed in sheds.</p> <p>Forklifts fitted with mufflers.</p>

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded 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.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Closest residential receptor	20 metres boundary to boundary across road to south
Environmental receptors	Distance from prescribed activity
Underlying groundwater (non-potable purposes)	2 metres below ground level

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and take into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder 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 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 Table 4.

The Revised Licence L6794/1992/9 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4. Risk assessment of potential emissions and discharges from the Premises operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Reasoning
Source/ Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Manufacture and printing of cardboard.	Contaminated wastewater (primarily with ink and starch)	Direct discharge to land causing contamination. Infiltration to groundwater causing contamination	Soil on the premises Groundwater	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	1 and 2	The delegated officer considered the capacity of the premises WWTP and expected wastewater production volumes and determined the WWTP is expected to have sufficient capacity for storage and pre-treatment of the expected volume of wastewater associated with the production increase. Treated wastewater will be disposed to sewer under permit or an offsite facility. The delegated officer considered the existing WWTP containment infrastructure is fit for purposes and included conditions to maintain the infrastructure in this manner in the licence
	Solid waste (filter cake)	Direct discharge to land causing contamination	Soil on the premises	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	2	The delegated officer determined existing management of wastewater treatment wastes is appropriate and specified storage requirements in line with the licence holder's management of the waste prior to offsite disposal.
	Odour	Air/windborne pathway causing impacts to health and amenity	Residence 20 metres away	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	1	There is not expected to be a change to the risk of odour impacts as a result of the amendment. The delegated officer considered the licence holder's controls relating to odour from the WWTP are

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Reasoning
Source/ Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								appropriate and applied these as operational conditions in the licence
	Noise			Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	NA	There is no change to the risk of noise emissions impacting on resident's health or amenity as a result of the amendment as the production increase is associated with efficiency improvements rather than additional infrastructure or activities. Noise emissions from the premises are required to comply with requirements of the <i>Environmental Protection (Noise) Regulations 1997</i> .

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

Note 2: Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal 2 May 2023	NA	NA
Water Corporation advised of proposal 2 May 2023	NA	NA
Licence Holder was provided with draft amendment on 14 June 2023 and responded on 10 July 2023.	The WWTP does not have a continuous pH monitoring or automatic chemical dosing system in place and discharges waste water in batches to sewer rather than continuously. pH is checked and chemical adjustments made prior to manually opening the valve to discharge to sewer. Request condition is revised to reflect this.	The Delegated Officer considers the method of monitoring and chemical dosing is appropriate given discharge occurs via batch rather than continuously and does not represent an additional risk to the environment therefore the condition has been updated to reflect this approach.

5. Decision

The Delegated Officer considers that the proposed increase in production is consistent with the capacity of the wastewater treatment plant and there is no there is no significant change in the risk profile of emissions and discharges from the premises. The proposed production increase is unlikely to result in a material increase to the overall risk profile of the premise.. In coming to this conclusion the Delegated Officer has considered the following points:

- the capacity of the wastewater treatment plant;
- the expected process wastewater volumes associated with the increased;
- the licence holder having alternate disposal options for wastewater in event of a breakdown or malfunction of the WWTP; and
- the licence holder having appropriate controls in place to mitigate the likelihood of containment loss and odour emissions from the WWTP.

The Delegated Officer has included the licence holder's containment and odour related controls as operational conditions in the amended licence.

6. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

6.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
Cover Page of Instrument	Amend production capacity from 40,000 tonnes per annum to 60,000 tonnes per annum
Condition 1	Operational requirements for the wastewater treatment plant have been included in new condition 1.
Condition 2	The waste management requirements (previously condition 1) have been expanded to include the licence holder's management of WWTP waste and specify that process wastewater is treated via the WWTP

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. Visy Board Pty Ltd 2022, *Application and additional information for licence amendment*. Perth Western Australia