



# Decision Document

## *Environmental Protection Act 1986, Part V*

---

**Proponent:** **Aerospace NDI Pty Ltd**

**Licence:** **L8465/2010/2**

---

**Registered office:** 41-43 Parkin Street  
ROCKINGHAM WA 6168

**ACN:** 073 197 387

**Premises address:** Aerospace NDI Pty Ltd  
Lot 839 on Plan 57538  
68 May Holman Drive  
BASSENDEAN WA 6054  
Being Lot 839 on Plan 57538

**Issue date:** Friday, 06 November 2015

**Commencement date:** Thursday, 12 November 2015

**Expiry date:** Wednesday, 11 November 2020

### **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:

Gargi Joshi  
Licensing Officer

Decision Document authorised by:

Lauren Trott  
Delegated Officer



## Contents

Decision Document	1
Contents	2
1 Purpose of this Document	2
2 Administrative summary	3
3 Executive summary of proposal and assessment	4
4 Decision table	5
5 Advertisement and consultation table	12
6 Risk Assessment	13

### 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.



## 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	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	48	100 tonnes per annual period
Application verified	Date: 4 August 2015	
Application fee paid	Date: 19 August 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"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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"/>
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>



### **3 Executive summary of proposal and assessment**

Aerospace NDI Pty Ltd (ANDI) undertakes maintenance of aircrafts and aircraft components. These maintenance activities occasionally require components to be cadmium plated for which a small parts cadmium plating line is present on site. The premises is located within the Town of Bassendean in an area zoned as general industrial.

The process of cadmium plating involves several cleaning steps, stripping of old plating or paint, electroplating steps and rinsing between and after each operation. The bath uses cadmium anodes in a cyanide/water (not heated) solution. Approximately 1000 litres of waste (maximum) is produced in a calendar year. Waste is collected by a controlled waste carrier for disposal offsite.

The Premises is considered a low risk premises. The licence is recommended to be re-issued for a period of 5 years.



## 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			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	1.2.1- 1.2.3	<p>Requirements specified through conditions 1.2.2, 1.2.4 and 1.2.5 of previous licence (L8465/2010/1) have been retained through conditions 1.2.1- 1.2.3 respectively.</p> <p>Previous licence (L8465/2010/1) condition 1.2.3 regarding storage of environmentally hazardous materials has not been retained. See Risk assessment below.</p> <p><u>Emission Description (Normal operation):</u>  <i>Emission:</i> Spills, leaks of chemicals during normal operation or storage and handling. Electroplating process uses a number of chemicals including sodium cyanide, surfactants, sulphuric acid, hydrochloric acid, nickel chloride, nickel sulphate, dichromate, caustic and nitric acid.  <i>Impact:</i> Improper storage/ handling of chemicals may result in emissions to land leading to stormwater contamination. The Premises is located in an industrial area. There are no surface water bodies nearby. Any spills may have a localised limited impact  <i>Control:</i> Storage of chemicals is undertaken in designated banded storage areas. Chemicals are stored in Intermediate Bulk Containers (IBCs). There are four separate banded areas for the cadmium plating line and chemical storage, as follows: <ul style="list-style-type: none"> <li>• chemical storage bund – Capacity 1390 litres (Maximum container size 180 litres);</li> <li>• cleaning cycle bund – Capacity 800 litres (Maximum container size 180 litres);</li> <li>• cadmium plate solution bund – Capacity 1200 litres (Solution tank is 750 litres); and</li> <li>• passivate bund - Capacity 850 litres (Maximum container size 180 litres).</li> </ul> </p>	L8465/2010/1



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>Process waste is stored in an IBC which is enclosed by a polyethylene bund able to contain 1350 litres in case of an accidental spill. Waste is disposed offsite using a controlled waste carrier. A liquid spill kit is located adjacent to the bunded area.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.2.2 requires the licensee to recover or remove and dispose of spills of environmentally hazardous materials outside containment. Condition 1.2.3 requires the licensee to implement all practical measures to prevent stormwater contamination and treat contaminated stormwater prior to discharge. Condition 1.2.1 requires the Licensee to ensure pollution control equipment is maintained.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	
<b>Premises operation</b>	-	<p>Previous licence (L8465/2010/1) did not have any conditions for premises operation. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new premises specific conditions are considered necessary.</p>	-



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>Emissions general</b>	-	Condition 2.1.1 on previous licence (L8465/2010/1) required investigation of exceedance of descriptive limits set regarding visible fumes and odour emissions from the premises. These descriptive limits have not been retained in this licence. See risk assessment for fugitive emissions section of this document.	L8465/2010/1
<b>Point source emissions to air including monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for point source emissions to air. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Point source emissions to surface water including monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for point source emissions to surface water. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Point source emissions to groundwater including monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for point source emissions to groundwater. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Emissions to land including monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for emissions to land. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Fugitive emissions	-	<p><u>Emission Description (Normal operation):</u> <i>Emission:</i> Fugitive emissions from process tanks during pre-treatment and electroplating stage. There is potential for fugitive emissions of acid mists, particulate and volatile organic compounds. <i>Impact:</i> The premises is located in an industrial area. Emissions of visible fumes may cause localised impact and local concern or complaints. Review of complaints database has not identified any complaints relevant to operation of this premises. <i>Control:</i> An exhaust system is used to manage fugitive emissions from electroplating tanks. The metal finishing operation is only a small component of the business and is not the primary activity on site.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Fugitive emissions from the premises can be managed under general provisions of the <i>Environmental Protection Act 1986</i>. Condition 2.6.1 from previous licence (L8465/2010/1) has not been retained.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	<i>Environmental Protection Act 1986</i>





DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Odour		<p><u>Emission Description (Normal operation):</u> <i>Emission:</i> Some odour emissions associated with chemicals used in process, volatile organics and acid mists may be expected though these are not considered to be key emissions for electroplating type activities. <i>Impact:</i> The premises is located in an industrial area. Odour emissions may cause localised impact and local concern or complaints. Review of complaints database has not identified any complaints relevant to operation of this premises. <i>Control:</i> An exhaust system is used to provide ventilation during operation of electroplating tanks. The metal finishing operation is only a small component of the business and is not the primary activity on site.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Odour emissions from the premises can be managed under general provisions of the <i>Environmental Protection Act 1986</i>. Condition 2.7.1 from previous licence (L8465/2010/1) has not been retained.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	-



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>Noise</b>	-	Previous licence (L8465/2010/1) did not have any conditions for emissions to land. Potential noise emissions can be managed under <i>Environmental Protection (Noise) Regulations 1997</i> .	<i>Environmental Protection (Noise) Regulations 1997</i>
<b>Monitoring general</b>	-	Previous licence (L8465/2010/1) did not have any monitoring conditions. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Monitoring of inputs and outputs</b>	-	Previous licence (L8465/2010/1) did not have any conditions for monitoring of inputs and outputs. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Process monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for process monitoring. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Ambient quality monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for ambient quality monitoring. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Meteorological monitoring</b>	-	Previous licence (L8465/2010/1) did not have any conditions for meteorological monitoring. DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-
<b>Improvements</b>	-	DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No (significant) changes have occurred. No new conditions are considered necessary.	-



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>Information</b>	L2.1.1- L2.1.4 L2.2.1	Recordkeeping requirements are specified in condition 2.1.1 and 2.1.2. Condition 2.1.3 requires the licensee to submit an Annual Audit Compliance Report. Condition 2.1.4 requires the licensee to implement a complaints management system. Condition 2.2.1 requires the licensee to submit an Annual Environmental Report. These conditions retain the requirements specified through section 5 of previous licence (L8465/2010/1).	-
<b>Licence Duration</b>	-	The premises is considered low risk. In accordance with DER's current practice, the licence is recommended to be granted for a period of 5 years.	DER Guidance Statement: <i>Licence duration Part V Environmental Protection Act 1986, May 2015.</i>



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
31/08/2015	Application advertised in West Australian (or other relevant newspaper)	No comments received.	Not applicable.
5/11/2015	Proponent sent a copy of draft instrument	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