



## Application for a licence amendment

Division 3, Part V *Environmental Protection Act 1986*

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|--------------------------|--|
| <b>Licence number</b>    | L8669/2012/2   |
| <b>Licence holder</b>    | CSBP Limited   |
| <b>ACN</b>               | 008 668 371  |
| <b>File number</b>       | DER2014/000904-1   |
| <b>Premises</b>          | CSBP Albany Fertiliser Depot<br>198 Hanrahan Road<br>ALBANY WA 6330<br><br>Legal description –<br>Part of Lot 211 on Plan 416231<br>Certificate of Title Volume 2818 Folio 699 |
| <b>Date of report</b>    | 6 May 2024   |
| <b>Proposed decision</b> | Revised licence granted  |

# 1. Amendment description

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the existing licence issued for a prescribed premises as set out below. This notice of amendment is hereby given under section 59B(9) of the EP Act.

This amendment is made to reflect the works completed under works approval W6465/2020/1. In completing the assessment documented in this report, the department 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>.

## 1.1 Purpose and scope of assessment

CSBP Limited (CSBP/licence holder) is seeking to amend licence L8669/2012/2 to reflect the works completed under works approval W6465/2020/1 which relates to changes to surface water management, bore location and premises boundary necessitated by the southern boundary of the premises being procured by Main Roads Western Australia (Main Roads) to facilitate construction of the Albany Ring Road (ARR). No changes to existing operations have been requested in the application.

The amendment application was received on 27 February 2024 following an Environmental Compliance Report (ECR) (CSBP Albany, 2024) which demonstrated the works authorised under works approval W6465/2020/1 had been completed to specification of the works approval conditions.

## 2.1 Background

CSBP holds licence L8669/2012/2 for the CSBP Albany Fertiliser Depot (premises). The premises receives, stores, blends and dispatches granular fertiliser. The fertilisers are imported via the Albany Port or transferred by road from the company's manufacturing facility in Kwinana.

As authorised in the existing licence L8669, lined drains on the premises direct stormwater to a lined pond. Captured stormwater may contain fertiliser from operating areas. Therefore, water from the lined pond is processed through a treatment plant to remove some of the phosphorous and nitrogen prior to offsite discharge to the Munster Hill drain via a V-notch weir. Various processes and infrastructure at the premises are used to manage fertiliser unloading, blending and dispatch activities to minimise contamination of stormwater resulting from spills, airborne dispersal and tracking out of fertiliser product from storage and dispatch facilities.

# 3. Proposed amendment

Only changes to infrastructure and operation details completed under works approval W6465/2020/1 that may alter the risk profile of the premises will be assessed in this report. These changes, which are primarily associated with surface water management, include:

- Operation of the realigned southern unlined drain and unlined pond (SW8) which has been extended to the east to compensate for the encroachment of ARR construction to the south. This modification includes an increase in storage volume from 7 m to 7.4 m Australia Height Datum (AHD);
- Operation of new precast concrete channel, V-notch weir (discharge point SW4) and concrete discharge channel; and
- Operation of the new and relocated high density polyethylene (HDPE) treated water pipeline. The pipeline runs above ground due west of the plant over the lined drain and unlined drain and discharges into the new concrete discharge channel to the new V-notch weir associated with discharge point SW4. The pipeline has a bypass above the lined drain for maintenance to allow water from the wastewater treatment plant (WWTP) to be returned to the lined pond.

The works approval included the assessment and authorisation of re-lining existing stormwater pond SW11 with a 1.5 mm HDPE liner. However, the delegated officer notes that these works were not completed. According to the ECR, CSBP is investigating alternative water treatment options at the premises, and until this process is complete, the existing SW11 liner (0.76 mm thick polyvinyl chloride (PVC) covered with a 400 mm thick layer of sand and gravel) will remain operational.

In addition to the above changes to infrastructure, the southern boundary of the premises has changed to facilitate the new ARR construction. Therefore, an amendment to the premises boundary and cadastral description is required on the licence.

## 4. Risk assessment

The table below describes the risk events associated with the amendments consistent with the *Guidance Statement: Risk Assessments* (DER 2017). The table identifies whether the risk events are acceptable and tolerated, or unacceptable and not tolerated, and the appropriate treatment and degree of regulatory control, where required.

| Source/ Activities   | Risk Event   |   |  | Consequence rating <sup>1</sup>               | Likelihood rating <sup>1</sup>  | Risk <sup>1</sup>   | Reasoning  | Regulatory controls (refer to conditions of the granted instrument)  |
|--|--|---|--|---|---|---|--|--|
|  | Potential emissions  | Potential receptors, pathway and impact   | Licence holder controls  |   |   |   |  |  |
| <b>PROPOSED AMENDMENTS</b>   |  |   |  |   |   |   |  |  |
| Loss of containment of stormwater in reconfigured <b>southern unlined drain</b> and reconfigured <b>unlined pond SW8</b>               | Treated stormwater potentially containing nutrients, trace elements and metals | Discharge to land as a result of overtopping causing soil degradation. Seepage through soil causing groundwater quality degradation.                                    | <ul style="list-style-type: none"> <li>Operation of a new untreated stormwater concrete overflow mechanism on the northern unlined drain that allows the unlined pond (SW8) to overflow to the concrete channel and discharge to the V-notch weir discharge point (SW4).</li> <li>Increase in storage volume in pond SW8 from 7 m to 7.4 m AHD will reduce the frequency of untreated stormwater overflow events.</li> </ul> | <b>Minor</b><br>Low level on-site impacts     | <b>Possible</b><br>The risk event could occur at some time                      | <b>Medium</b><br>Acceptable, subject to regulatory controls | <p>The delegated officer considers that the relocation and realignment of the unlined drainage system, and the operation of the new surface water management infrastructure will not materially change the risk profile of the premises which has already undergone risk assessment. Therefore, existing conditions on the licence will remain in order to maintain an acceptable level of risk. No additional controls will be placed on the amended licence.</p> <p>As part of the amendment, the delegated officer will update the licence to the current form and style, which includes an infrastructure table specifying operational requirements.</p> | <p>Wastewater treatment pond operation and maintenance conditions, which are included on the existing licence, will be updated to the current format and included in an infrastructure table in the amended licence. Licence holder initiated control, being the operation of the new overflow mechanism, has been added to prevent uncontrolled spill from the unlined pond (SW8).</p> <p>Existing licence conditions requiring daily spot samples at the SW4 discharge point will be included on the amended licence.</p> <p>Existing groundwater monitoring conditions will be included in the amended licence.</p> <p><i>Updated maps have been included in the amended licence to reflect the realignment of the southern unlined drain and unlined pond SW8.</i></p> |
| Loss of containment of treated wastewater in the new <b>treated water pipeline</b>   | Treated wastewater potentially containing nutrients, trace elements and metals | Discharge to land as a result of leaks or rupture, causing soil degradation. Seepage through soil causing groundwater quality degradation.                              | Nil  | <b>Minor</b><br>Low level on-site impacts     | <b>Unlikely</b><br>The risk event will probably not occur in most circumstances | <b>Medium</b><br>Acceptable, subject to regulatory controls | <p>Existing conditions relating to treated wastewater and stormwater containment will be incorporated in the table.</p> <p>Existing surface water monitoring and groundwater monitoring requirements will be included on the new licence which are necessary in detecting any significant issues with the water management onsite.</p>   | <p>Conditions relating to the maintenance and operation of stormwater management infrastructure, which are included on the existing licence, will be updated to the current format and included in an infrastructure table in the amended licence.</p>   |
| Uncontrolled discharge of treated wastewater from the new relocated <b>concrete V-notch weir, and concrete discharge channel (SW4)</b> | Potentially contaminated treated wastewater                                    | Discharge of contaminated water (runoff from site and stormwater) to land causing erosion and soil degradation; and seepage through soil impacting groundwater quality. | The new V-notch weir is sized to receive full flow of treated water as well as additional emergency overflow.  | <b>Moderate</b><br>Low level off-site impacts | <b>Unlikely</b><br>The risk event will probably not occur in most circumstances | <b>Medium</b><br>Acceptable, subject to regulatory controls | <p>Existing licence conditions specifying emission limits, and the requirement for water volume and quality monitoring at SW4 will be included on the amended licence.</p> <p><i>Updated maps have been included in the amended licence to reflect the relocation of the V-notch weir and concrete channel and discharge point SW4.</i></p>  |  |

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

## 5. Decision

The delegated officer has determined that the operation of the reconfigured unlined southern drain and pond SW8, new relocated pre-cast concrete V-notch weir and discharge channel, and new water treatment plant pipeline will not alter the risk profile of the premises. This determination is based on the infrastructure being constructed in accordance with the conditions of works approval W6465/2020/1 and operated in accordance with existing conditions of licence L8669, as documented in the Environmental Compliance Report (ECR) (CSBP Albany, 2024) received by DWER on 14 February 2024. Therefore, the licence will be updated to the current DWER format to include an infrastructure and operational requirements table (see 5.1 Licence update), but no additional regulatory controls will be placed on the amended licence.

As necessitated by the encroaching construction of the Albany Ring Road (ARR), the new groundwater monitoring bores' locations have been updated in the licence. The boundary and cadastral description on the licence has also been amended to reflect the change to the southern boundary of the premises to accommodate the ARR construction. The delegated officer considers these changes to be administrative amendments as they do not negatively impact environmental receptors and so a risk assessment is not warranted. Updated maps of the premises boundary and groundwater monitoring bores have been included in the amended licence.

### 5.1 Licence update

As part of this amendment the delegated officer has updated the format and appearance of the licence, consistent with the current DWER template. This includes the introduction of an authorised infrastructure table that includes operational requirements, which the department is incorporating into all licences, for the purpose of clearly listing infrastructure that is authorised on the premises to assist with compliance inspections.

The controls listed in this new table is based on the department's understanding of existing infrastructure and operational practices currently in place for the purpose of ensuring there is an acceptable risk from emissions and discharges from ongoing operations at the premises. No additional assessment has been conducted as part of this update.

In amending the licence, the delegated officer has also:

- deleted redundant AACR form set out in Schedule 1 of the previous licence;
- revised condition numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

### 5.2 Licence holder comments on draft decision

The licence holder was provided with a draft of the revised licence and amendment report on 18 April 2024 and responded on 2 May 2024. The comments are summarised along with DWER's response as an attachment to this report.

## 6. Conclusion

Based on this assessment, it has been determined to amend the existing licence, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 6.1 Summary of amendments

The below table provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the revised works

approval as part of the amendment process.

| Condition no.                     | Proposed amendments   |
|-----------------------------------|---|
| Cover page                        | Legal description of premises updated.  |
| History                           | Updated to include current amendment.   |
| Conditions 1, 2, 3, 4, 5, 6 and 7 | Incorporated into the infrastructure table, now Condition 1, Table 1.   |
| Condition 5                       | Authorised discharge point added as stand-alone condition (Condition 2).  |
| Condition 8                       | Moved to the Records and Reporting section of the licence (now Condition 7).  |
| Condition 9, Table 2              | Now Condition 4 - column added to Table 4 (Surface water discharge monitoring) to specify units of measurement.                                 |
| Condition 10, Table 3             | Now Condition 5, Table 5 – Monitoring point reference C8, C12, C15 and C17 deleted. Monitoring reference points C8A, C12A, C17A and AW19 added. |
| Condition 11                      | Deleted. Redundant condition.   |
| Condition 13                      | Incorporated into the infrastructure table, now Condition 1, Table 1.   |
| Condition 17                      | Incorporated into the Annual Environmental Report condition (now Condition 10, Table 6)   |
| Schedule 1: Maps                  | Premises map updated to reflect change in boundary.   |
|                                   | Site layout map updated.  |
|                                   | Map of groundwater monitoring locations updated.  |

## References

1. CSBP Albany 2024, *Environmental Compliance Report (ECR) – Works Approval W6465/2020/1*, 12 February 2024.
2. Department of Environment Regulation (DER) 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia.

## Summary of licence holder's comments on risk assessment and draft conditions

| Document reference   | Licence holder comment   | DWER response  |
|--|--|--|
| Licence condition 1<br>Table 1, row 2, sludge beds   | <i>Context: The draft licence included a condition that the sludge beds are only to be used for temporary storage of sludge.</i><br>Licence holder advised that currently two of the sludge beds are being used for a wetland trial and Granular Activated Carbon filter bed, and that this does not diminish the ability to manage sludge from the water treatment plant. | Condition has been deleted as it was included in the draft in error when updating the licence format as part of the CEO initiated amendment. |
| Licence condition 1<br>Table 1, row 6, operational requirements column<br>Licence condition 4<br>Table 4, monitoring location (2nd column) | Reference error to site plan   | References updated.  |
| Licence Schedule 1:<br>Premises map  | Map does not accurately reflect prescribed premises boundary.  | Updated prescribed premises boundary map.  |