



Application for Licence

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

Licence Number	L9347/2022/1
Applicant	Gulf Chrome Pty Ltd
ACN	117 663 993
File number	DER2022/000473
Premises	Auschrome Engineering 18 Denninup Way MALAGA WA 6090 Legal description Lot 138 on Plan 16697 As defined by the premises maps attached to the issued licence
Date of report	24 October 2023
Decision	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

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the Auschrome Engineering premises. As a result of this assessment, licence L9347/2022/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision 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 [DWER Regulatory documents | Western Australian Government \(www.wa.gov.au\)](https://www.wa.gov.au/government/publications/regulatory-documents).

2.2 Application summary and overview of the premises

On 1 August 2022, Gulf Chrome Pty Ltd (the applicant) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application is to seek a licence relating to chrome plating at the Auschrome Engineering premises, located at 18 Denninup Way, Malaga. The premises is in the Malaga industrial area approximately 11.5 km north northeast of the Perth CBD.

The process undertaken on the premises involves chrome plating of manufactured parts by immersing them in a tank containing chromic and sulfuric acid, and passing a current through the items. Power rectifiers are used to convert AC to DC current for the plating process. Plated items are washed in a second rinse tank and allowed to drip dry over the tank.

There will be no discharge of liquid waste as part of normal operations at the premises. The tank system is designed for reuse of wash water which will be collected and returned to the chrome tank. All chemicals remain in the tank and are deposited on plating works. The chrome plating tank will have its contents tested for chemical strength and when no longer suitable for use, acid and sludge from the tank will be collected and removed by a licensed controlled waste contractor.

The premises relates to Category 48: Metal finishing and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L9347/2022/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L9347/2022/1.

2.3 Works approval compliance

The applicant was granted works approval W6263/2019/1 for the installation and time limited operations of the chrome plating infrastructure on the premises. The works approval holder submitted a completion of works notice (Environmental Compliance Report (ECR)) following completion of construction of the infrastructure on 27 May 2022. The Department requested further information on 20 December 2022 and 15 May 2023.

On 5 July 2023 the applicant submitted additional details of the construction of the premises infrastructure. A review of the compliance documentation submitted found that the infrastructure has been built generally in accordance with the requirements of condition 1 of the works approval which included specific infrastructure controls to ensure tanks and bunding have adequate protection from corrosive substances.

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.

The risk associated with emissions and discharges from the operation of the premises infrastructure has previously been assessed following the department's regulatory risk framework for works approval W6263/2019/1. A copy of this assessment is attached in Appendix 1 (refer to section 8). Taking into account the licence application and the applicant's compliance documentation for the works approval, the delegated officer did not identify any changes to the previously assessed risk profile that required further detailed assessment.

The premises is located within a P3 public drinking water source area (PDWSA) proclaimed under the *Metropolitan Water Supply, Sewerage and Drainage Act 1909*, and lies within the Gngarara Underground Water Pollution Control Area. The PDWSA protects the quality of drinking water used by Water Corporation for domestic supply in the Perth metropolitan area.

To ensure sufficiently low level of risk of impact to the PDWSA from the activities on the premises the plating tanks have been constructed in accordance with *Australian Standard 1692 – 2006 (AS1692) Steel tanks for flammable and combustible liquids* and lined with a coating resistant to corrosive substances. The tanks are located within bunding which also has a coating resistant to corrosive substances.

4. Consultation

Table 1 provides a summary of the consultation undertaken by the department.

Table 1: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 1 August 2023	None received	NA
Local Government Authority advised of proposal on 1 August 2023	NA	NA
Applicant was provided with draft documents on 28 September 2023	Applicant advised 23 October 2023 that they had no comments.	N/A

5. Decision

The delegated officer has determined the application to operate a chrome electroplating facility at the premises does not pose an unacceptable risk of impacts to public health or the environment. This determination is based on the following:

- the proposed small scale of the facility (200 tpa);
- the chrome plating infrastructure was previously assessed for the grant of works approval

W6263/2019/1 and the risk of impact to receptors was not deemed to be unacceptable subject to the applied works approval infrastructure conditions; and

- the applicant has installed the chrome plating infrastructure on the premises in accordance with the conditions of works approval W6263/2019/1.

Licence L9347/2022/1 contains conditions based on operational requirements of the constructed premises infrastructure, as outlined in Condition 1 and 7 of works approval W6263/2019/1. These operational requirements were determined in accordance with the *Guidance Statement: Setting conditions* (DER 2015) to address the risk of emission impacts associated with the ongoing operation of the chrome plating infrastructure including air emissions, odour and liquid discharges from spills or leaks.

General conditions required for compliance reporting, complaint investigation, and record keeping will also be included in the licence. The delegated officer has had regard to the Environmental Compliance Report submitted by the applicant on 5 July 2023, and notes that compliance with works approval W6263/2019/1 has been demonstrated.

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements. The delegated officer has taken into account the *Guidance Statement: Licence duration* and granted the licence for 20 years.

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. Auschrome 2022 *Application for licence* Perth Western Australia
5. Auschrome 2022 *Completion of works notice* Perth Western Australia
6. Auschrome 2023 *Environmental Compliance Report*, Perth Western Australia

Appendix 1 Decision Report for W6263/2019/1



Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Works Approval

Division 3, Part V *Environmental Protection Act 1986*

Licence Number	W6263/2019/1
Applicant	Gulf Chrome Pty Ltd
ACN	117 663 993
File Number	DER2019/000354
Premises	Auschrome Engineering 18 Denninup Way MALAGA WA 6090 Legal description - Lot 138 on Plan 16697
Date of Report	29 April 2020
Status of Report	Final

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7. Definitions of terms and acronyms

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

Table 2: Definitions

Term	Definition
ACN	Australian Company Number
AS1692	means AS1692-2006 <i>Steel tanks for flammable and combustible liquids</i> Standards Australia (Reconfirmed 2016)
A3780	means AS3780-2008 <i>Storage and handling of corrosive substances</i> Standards Australia
Category/ Categories/ Cat.	Categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CS Act	<i>Contaminated Sites Act 2003</i> (WA)
Decision Report	refers to this document.
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</i> (WA)
EP Regulations	<i>Environmental Protection Regulations 1987</i> (WA)
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997</i> (WA)
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report
Primary Activities	as defined in Schedule 2 of the Works Approval

8. Purpose and scope of assessment

Gulf Chrome Pty Ltd (the Applicant) lodged an application for a works approval on 17 June 2019 (the Application) to construct a metal finishing facility (Category 48). The proposed site is in Malaga, an industrial area approximately 10 km north east of Perth CBD.

The scope of assessment includes the risk of emissions during the construction and operational phases. The assessment will also consider a time limited operations phase that allows the Applicant to commence prescribed activities at the completion of works and subject to determined works approval conditions, while a licence application is determined. This Decision Report documents the Delegated Officer's assessment and determination of the Application consistent with DWER's Regulatory Framework.

8.1 Application details

The Application comprised of an application form and supporting documentation. Those documents that form the Application and the Departmental Guidance Statements that have informed assessment of the Application are set out in Appendix 1.

9. Background

The Applicant operates an existing licensed (L8352/2009/2) chrome plating facility in Maddington and proposes to relocate its current operation to Malaga.

Table 3 lists the prescribed premises categories that have been applied for.

Table 3: Prescribed Premises Categories in the Existing Licence

Classification of Premises	Description	Approved Premises production or design capacity or throughput
Category 48	Metal finishing: premises on which metals are chemically cleaned or metals, plastics or metal or plastic products are plated, electroplated, anodized, coloured or otherwise coated or finished.	200 tonnes per annum

10. Overview of Premises

10.1 Operational aspects

The Applicant proposes to construct a hard chrome plating facility mainly for the hydraulic components of machinery at their existing premises in Malaga. The process generally involves:

- pre-treatment- solvent degreasing and/or alkali cleaning;
- acid etching – prepares items for plating using approximately 10% solution of sulfuric acid in a tank;
- rinsing – items are rinsed in a water tank after etching;
- chrome plating – items are dipped into a tank containing chromic acid and sulfuric acid (prepared by adding 250 g/L Cr_2O_3 and 2.5 g/L H_2SO_4) and passing a current through the items to be plated; and
- post chrome plating rinse – items are dipped into the rinse tank again and then lifted above it and rinsed with a fine mist of water dripping into the rinse tank.

Power rectifiers are used to convert AC to DC current for the plating process.

10.2 Infrastructure

Infrastructure as it relates to Category 48 activities, is detailed in Table 4 and with reference to the Site Plan shown in Figure 1.

Table 4: Auschrome Malaga facility Category 48 infrastructure

	Infrastructure	Site Plan Reference
	Prescribed Activity Category 48	
1.	4 x plating tanks of volumes (23 kL, 28 kL, 10 kL and 6.6 kL).	Figure 1
2.	Concrete in floor secondary containment for plating tanks with sloped floor.	NA
3.	2 x stripping/emergency spill tanks (7.8 kL and 5 kL)	Figure 1
4.	2 x transportable emergency tanks stored on site each capable of storing the volume of the largest tanks.	NA
5.	5 x plating rectifiers	NA

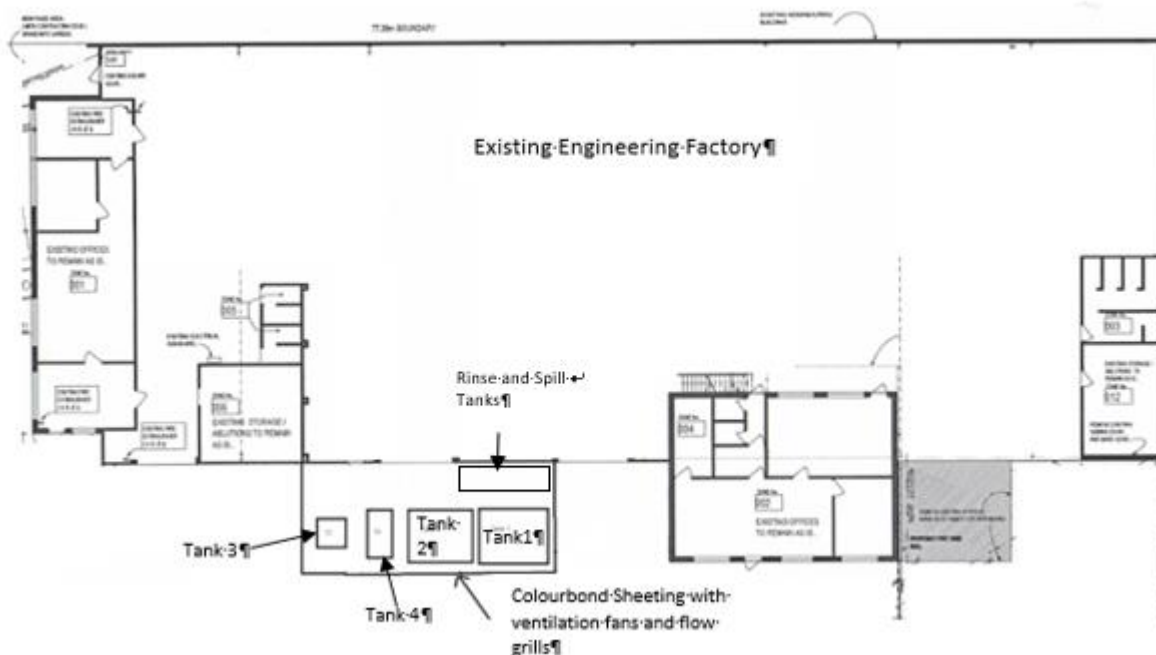


Figure 1: Layout of Auschrome Malaga Facility

11. Legislative context

Table 5 summarises approvals relevant to the assessment.

Table 5: Relevant approvals and tenure

Legislation	Number	Subsidiary	Approval
<i>Dangerous Goods Safety Act 2004</i>	Not specified	Gulf Chrome	Storage of Dangerous Goods (e.g. corrosive liquids) will be subject to Dangerous Goods licensing

Legislation	Number	Subsidiary	Approval
			requirements administered by DMIRS

11.1 Contaminated sites

The site has not been reported as a contaminated site under the CS Act.

11.2 Other relevant approvals

11.2.1 Planning approvals

The Applicant applied for planning approval with the City of Swan (DA-577/2019) on 9 September 2019. The City of Swan resolved to grant planning approval 8 April 2020. Conditions on the planning approval will include a requirement to obtain a works approval from DWER and preventing contaminated stormwater entering on-site and off-site drains.

11.3 Part V of the EP Act

11.3.1 Applicable regulations, standards and guidelines

The overarching legislative framework of this assessment is the EP Act and EP Regulations.

The guidance statements which inform this assessment are

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guideline: Industry Regulation Guide to Licensing (June 2019)*
- *Guideline: Decision Making (June 2019)*
- *Guidance Statement: Risk Assessments (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

11.3.2 Clearing

The proposed construction is on a developed industrial lot and will not include any clearing of native vegetation. A works approval will not authorise any clearing of native vegetation within the premises.

12. Consultation

The application for a works approval was publicly advertised on 19 July 2019 and no submissions were received.

13. Location and siting

13.1 Siting context

13.2 Residential and sensitive Premises

The distances to residential and sensitive receptors are detailed in Table 6.

Table 6: Receptors and distance from activity boundary

Sensitive Land Uses	Distance from Prescribed Activity
Residential Premises	700 metres north in Illawarra Crescent in Ballajura
Stormwater sump	80 metres south
Adjacent businesses	There is a copper pipe manufacturer and wholesaler on the northern boundary, a sand a firewood yard on the southern boundary and an engineering premises opposite on Denninup Way. An uncleared portion of an electrical substation premises is on the eastern boundary.

13.3 Specified ecosystems

Specified ecosystems are areas of high conservation value and special significance that may be impacted as a result of activities at or Emissions and Discharges from the Premises. The distances to specified ecosystems are shown in Table 7. Table 7 also identifies the distances to other relevant ecosystem values which do not fit the definition of a specified ecosystem.

The table has also been modified to align with the *Guidance Statement: Environmental Siting*.

Table 7: Environmental values

Specified ecosystems	Distance from the Premises
Geomorphic Wetlands	The premises is partially within an unnamed multi-use sumpland affected by changes to drainage patterns from urban development.
Other relevant ecosystem values	Distance from the Premises
Greengrowth commitment Quenda and Bassendean Complex	An example of Bassendean Complex is located across the eastern boundary which is also classed as possible quenda habitat.

13.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 8.

Table 8: Groundwater and water sources

Groundwater and water sources	Distance from Premises	Environmental value
Public drinking water source areas	Premises is within a Priority 3 PDWSA and 240 metres from a well head protection zone	Confined aquifers used as public drinking water source
Groundwater	Depth to ground water approximately 5.8 m (Perth Groundwater Atlas)	Superficial aquifer on a wider scale may be used for irrigation or potable water

14. Risk assessment

14.1 Determination of emission, pathway and receptor

In undertaking its risk assessment, DWER will identify all potential emissions pathways and potential receptors to establish whether there is a Risk Event which requires detailed risk assessment.

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. Where there is no actual or likely pathway and/or no receptor, the emission will be screened out and will not be considered as a Risk Event. In addition, where an emission has an actual or likely pathway and a receptor which may be adversely impacted, but that emission is regulated through other mechanisms such as Part IV of the EP Act, that emission will not be risk assessed further and will be screened out through Table 9 and Table 10.

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 9 and Table 10 below.

Table 9: Identification of emissions, pathway and receptors during construction

Risk Events					Continue to detailed risk assessment	Reasoning
Sources/Activities	Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts		
Construction of new buildings, and installation of tanks	Noise	Residential premises located 700 m north of the Premises.	Air / wind dispersion	Amenity impacts	No	Construction will only occur during the day, will not involve use of earth moving equipment and the separation distance to sensitive receptors is sufficient to prevent adverse impacts. Other considerations addressed by the Noise Regulations.
	Dust			Amenity impacts	No	Minor building and installation of tanks mean only slight amount of dust caused which will not impact sensitive receptors 700 metres away.

Table 10: Identification of emissions, pathway and receptors during operation

Risk Event				Applicant controls	Risk (from Section 14.2)	Reasoning	Regulatory controls
Source/ Activities	Potential emissions	Potential receptors	Potential pathway & receptor (impact)				
Chrome Plating	Emissions of acid and chrome vapours, fumes or aerosols to air	Residential premises located 700 m north of the Premises.	Air / wind dispersion Health and amenity effects	Tanks completely enclosed and fume suppressant used in solution	Slight consequences Rare Low Risk	Small dipping tanks operated inside a building with fume suppressant on chrome plating tanks mean risk to receptors is very low	Licence Conditions (refer to Section 15.3)
	Leaks and spills of chemicals	Soils in the local area; Groundwater located ~5.8m below ground level	Direct discharge and seepage causing contamination of soils and groundwater; Adverse impacts to the health and survival of vegetation dependent upon groundwater	Primary and secondary containment compliant with Australian Standard	Minor consequence Rare Low Risk	The Applicant's controls include the acid tanks will comply with AS1692 and AS3780 including secondary containment. The general provisions of the EP Act, the Unauthorised Discharge Regulation and the Dangerous Goods Safety Act 2004 apply to chemical storage on the Premises.	Works Approval and Licence Conditions (refer to Sections 15.1 to 15.3)
	Odour	Residential premises located 700 m north of the Premises.	Air / wind dispersion Amenity	Fume suppressant on Chrome plating tanks	Slight consequences Rare Low Risk	Applicant controls include conducting chrome plating activities inside an enclosed building and use of vapour suppressants are sufficient to ensure there are no adverse impacts on potential receptors.	NA
	Noise		Air / wind dispersion Amenity	Activities enclosed within building	Slight consequences Rare Low Risk	Noise not likely to be significant for an industrial area. 700 metres to sensitive receptors. Other considerations addressed by the Noise Regulations.	Noise Regulations

14.2 Consequence and likelihood of risk events

A risk rating will be determined for risk events in accordance with the risk rating matrix set out in Table 10 below.

Table 11: Risk rating matrix

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High

DWER will undertake an assessment of the consequence and likelihood of the Risk Event in accordance with Table 11 below.

Table 12: Risk criteria table

Likelihood		Consequence		
The following criteria has been used to determine the likelihood of the Risk Event occurring.		The following criteria has been used to determine the consequences of a Risk Event occurring:		
		Environment	Public health* and amenity (such as air and water quality, noise, and odour)	
Almost Certain	The risk event is expected to occur in most circumstances	Severe	<ul style="list-style-type: none"> onsite impacts: catastrophic offsite impacts local scale: high level or above offsite impacts wider scale: mid-level or above Mid to long-term or permanent impact to an area of high conservation value or special significance[^] Specific Consequence Criteria (for environment) are significantly exceeded 	<ul style="list-style-type: none"> Loss of life Adverse health effects: high level or ongoing medical treatment Specific Consequence Criteria (for public health) are significantly exceeded Local scale impacts: permanent loss of amenity
Likely	The risk event will probably occur in most circumstances	Major	<ul style="list-style-type: none"> onsite impacts: high level offsite impacts local scale: mid-level offsite impacts wider scale: low level Short-term impact to an area of high conservation value or special significance[^] Specific Consequence Criteria (for environment) are exceeded 	<ul style="list-style-type: none"> Adverse health effects: mid-level or frequent medical treatment Specific Consequence Criteria (for public health) are exceeded Local scale impacts: high level impact to amenity
Possible	The risk event could occur at some time	Moderate	<ul style="list-style-type: none"> onsite impacts: mid-level offsite impacts local scale: low level offsite impacts wider scale: minimal Specific Consequence Criteria (for environment) are at risk of not being met 	<ul style="list-style-type: none"> Adverse health effects: low level or occasional medical treatment Specific Consequence Criteria (for public health) are at risk of not being met Local scale impacts: mid-level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	<ul style="list-style-type: none"> onsite impacts: low level offsite impacts local scale: minimal offsite impacts wider scale: not detectable Specific Consequence Criteria (for environment) likely to be met 	<ul style="list-style-type: none"> Specific Consequence Criteria (for public health) are likely to be met Local scale impacts: low level impact to amenity
Rare	The risk event may only occur in exceptional circumstances	Slight	<ul style="list-style-type: none"> onsite impact: minimal Specific Consequence Criteria (for environment) met 	<ul style="list-style-type: none"> Local scale: minimal to amenity Specific Consequence Criteria (for public health) met

[^] Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting*.

* In applying public health criteria, DWER may have regard to the Department of Health's *Health Risk Assessment (Scoping) Guidelines*.

“onsite” means within the Prescribed Premises boundary.

14.3 Acceptability and treatment of Risk Event

DWER determines the acceptability and treatment of Risk Events in accordance with the Risk treatment Table 13 below:

Table 13: Risk treatment table

Rating of Risk Event	Acceptability	Treatment
Extreme	Unacceptable.	Risk Event will not be tolerated. DWER may refuse application.
High	May be acceptable. Subject to multiple regulatory controls.	Risk Event may be tolerated and may be subject to multiple regulatory controls. This may include both outcome-based and management conditions.
Medium	Acceptable, generally subject to regulatory controls.	Risk Event is tolerable and is likely to be subject to some regulatory controls. A preference for outcome-based conditions where practical and appropriate will be applied.
Low	Acceptable, generally not controlled.	Risk Event is acceptable and will generally not be subject to regulatory controls.

15. Regulatory controls

A summary of regulatory controls determined to be appropriate for the Risk Event is set out in Table 14. The risks are set out in the assessment in Section 14 and the controls are detailed in this section. DWER will determine controls having regard to the adequacy of controls proposed by the Applicant. The conditions of the Works Approval will be set to give effect to the determined regulatory controls.

Table 14: Summary of regulatory controls to be applied

		Controls (references are to sections below, setting out details of controls)	
		10.1.1 Infrastructure and equipment	10.1.4 Specified action
Risk Items	Vapour emissions from acid tanks		●
	Discharge to the environment through leaks and spills	●	

15.1 Works Approval controls

The Delegated Officer has considered the design and infrastructure measures submitted by the Applicant are sufficient to minimise the potential of an adverse environmental impact from the prescribed activity. Secondary containment infrastructure requirements are adapted from Applicant controls and Australian Standard AS 3780: which provides a nationally recognised standard for containing corrosive substances.

Following the completion of the works authorised by the Works Approval, the Applicant is required to submit an Environmental Compliance Report confirming that construction is in accordance with the Works Approval conditions.

15.2 Operating controls during time limited operation

Following the submission of the Environmental Compliance Report described in Section 15.1 the Delegated Officer has considered the potential risk from emissions and discharges during operation to be low. The issued Works Approval will therefore permit the Applicant to operate as a Category 48 premises for a Time Limited Operations phase of 180 days, subject to conditions. This period of operations under the Works Approval will allow the Applicant to submit an application for licence and for DWER to assess it, noting DWER's target timeframe of 60 working days to assess a licence application.

Conditions included in the Works Approval to allow the Applicant to operate as a Category 48 premises for the Time Limited Operations are listed in Table 15.

Table 15: Infrastructure and operational controls for Time Limited Operations

Infrastructure/ Equipment	Operational Requirements
Plating, spill and stripping tanks	<ul style="list-style-type: none"> Tanks and tank pits are maintained to prevent leaks Immediately recover and dispose of spills of process chemicals and solutions. Use a non Perfluorooctane Sulphonate fume suppressant in plating tanks at

	all times when chrome plating is being taking place.
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15.3 Licence controls

Following submission of the Compliance Report, the Applicant is required to submit an application for a licence.

Conditions listed in Table 15 will be transferred into the licence, subject to assessment of the Compliance Report, a licence application and any new information that becomes available to inform the risk assessment. General conditions suitable for Category 48 prescribed activities during ongoing operation of the Premises will be included on the licence, as listed below:

15.3.1 Complaints Management

The Licence Holder to implement a complaints management system that shall record the following information (if known or provided) about any complaints concerning any environmental impact of the activities undertaken at the Premises:

- i) date and time of complaint;
- ii) date and time of alleged incident; and,
- iii) actions taken (if required) to address the incident/activity resulting in the complaint.

15.3.2 Annual reporting

The annual reporting conditions on the Existing Licence will be amended to include:

- i) submission of an Annual Audit Compliance Report; and
- ii) submission of Annual Environment Report.

16. Applicant's comments

The Applicant was provided with the draft Decision Report and draft issued Works Approval on 17 October 2019 and replied on the same day advising they were satisfied with the conditions.

17. Conclusion

This assessment of the risks of activities on the Premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this Decision Report (summarised in Appendix 1).

Based on this assessment, it has been determined that the Issued Works Approval will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Chris Malley

A/Manager, Process Industries

Delegated Officer

under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key documents

	Document title	Availability
1.	Works Approval Application Gulf Chrome T/A Auschrome	DWER records A1797912
2.	Applicant email <i>Malaga facility layout plan</i> 30 August 2019	DWER records A1818940
3.	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at www.dwer.wa.gov.au
4.	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
5.	DWER 2019 <i>Guideline: Guide to Licensing</i> Department of Water and Environment Regulation, Perth	
6.	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
7.	DWER, June 2019. <i>Guideline: Decision Making</i> . Department of Water and Environment Regulation, Perth.	