Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Works Approval

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

Works Approval Number	W3191/2026/1
Applicant	Electricity Networks Corporation
File number	APP-0032723
Premises	Western Power – South Metro Depot 114 Ayres Road Forrestdale WA 6112 Legal description - Part of Lot 100 on Deposited Plan 416786 Certificate of Title Volume 2981 and Folio 454 As defined by the coordinates in Schedule 2 of the works approval
Date of report	08 April 2026
Decision	Works approval granted

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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 construction and time limited operation of the premises. As a result of this assessment, works approval W3191/2026/1 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 https://dwer.wa.gov.au/regulatory-documents.

2.2 Application summary and overview of premises

On 28 November 2025, the applicant, Electricity Networks Corporation (trading as Western Power) submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application relates to construction works for a liquid waste facility at the premises. The premises is approximately 6 km northwest of Armadale town centre and 22 km southeast of Perth city centre.

Electricity Networks Corporation proposes to install a bulk oil storage container and construct an underground oil–water separator (spillceptor) to manage stormwater runoff, which will be located adjacent to the proposed storage container (refer to Figure 1). The bulk oil storage unit is currently in use at the Western Power Kewdale Depot and will be relocated to the South Metro (Forrestdale) Depot. The container is a self-bunded, double-skin tank comprising three equally sized chambers (refer to Figure 2).

Electricity Networks Corporation intends to store up to 235 tonnes of waste oil per year within the bulk oil storage container. This configuration enables the separation and storage of new oil delivered from suppliers, in-service oil recovered from power transformers, and waste oil generated from maintenance activities awaiting disposal.

Waste oil consists of contaminated oil previously used in switchgear, tap changer oil, and used transformer oil. All waste oil stored within the tank will be removed by an authorised and licensed hazardous waste management contractor.

The premises relates to the category and assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W3191/2026/1. 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 works approval W3191/2026/1.

Figure 1: Premises location

Figure 2: Proposed oil storage container

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 construction and time limited operations which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Installation of bulk oil storage tank Installation and connection of a below ground oil water separator Vehicle movements	Air / windborne pathway	The premises floor is sealed with concrete
Noise		Air / windborne pathway	None proposed.
Time limited operations			
Noise	Storage of waste oil on in the self-bunded, double skin tank	Air / windborne pathway	None proposed.
Hydrocarbon and hazardous vapours (including PCB vapours)		Air / windborne pathway	Waste oil will be stored within a self-bunded double-skin storage tank. Systematically identify assets containing PCBs and replace equipment when leaks are detected. Adequate spill-response equipment, including spill kits, will be available and positioned in close proximity to storage areas, transmission substations, and substations with a capacity greater than 1,000 L. Use of an oil–water separator (spillceptor)Where appropriate, spill response equipment will be stored in maintenance and service vehicles to allow for quick response to spills.

Emission	Sources	Potential pathways	Proposed controls
Odour (from hydrocarbon)		Air / windborne pathway	Waste oil will be stored within a self-bunded double-skin storage tank.
Fire		Air / windborne pathway	Waste oil will be stored within a self-bunded, double-skin storage tank designed in accordance with fire protection and containment principles consistent with AS 1940 requirements.
Oil spills / leaks		Overland runoff Seepage to groundwater	A spring-loaded foot valve safety device and a remote pull-cord wire in the storage container will function as an emergency stop device for use in the event of a leak during the oil transfer process. Adequate spill-response equipment, including spill kits, will be available and positioned in close proximity to storage areas, transmission substations, and substations with a capacity greater than 1,000 L. Where appropriate, spill response equipment will be stored in maintenance and service vehicles to allow for quick response to spills. Use of an oil–water separator (spillceptor)
Contaminated stormwater runoff		Overland runoff Seepage to groundwater	A below-ground oil–water separator, with a maximum working capacity of 32,400 L, will be installed and connected to the existing stormwater network
Fire water		Overland runoff Seepage to groundwater	None proposed.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 2 and Figure 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Residential Premises	Approximately 250 m south-west of the premises boundary Approximately 450 m south-east of the premises boundary
Industrial premises	Approximately 210 m south of the premises boundary
Environmental receptors	**Distance from prescribed activity**
Priority Ecological Communities	Priority 3 ecological community located approximately 125 m northeast of the premises boundary
Threatened Ecological Communities	Critically Endangered - Herb rich shrublands in clay pans - located approximately 220 m northeast of the premises boundary
Threatened and Priority flora	Located approximately 390 m southwest of the premises boundary Located approximately 660 m southwest of the premises boundary
Wetlands	Ramsar Sites - Forrestdale & Thomsons Lakes - Approximately 1.9 km southwest of the premises boundary Important wetland – Forrestdale lake- Approximately 1.9 km southwest of the premises boundary Important wetland – Gibbs Road Swamp System - Approximately 2.5 km west of the premises boundary Geomorphic wetlands – Multiple use – located within the proposed lot Geomorphic wetlands – Conservation – located within the proposed lot Geomorphic wetlands – Resource Enhancement – located immediately adjacent to the proposed lot
DBCA legislated Lands and Waters	Jandakot regional park - approximately 110 m northeast of the premises boundary Nature Reserve - approximately 670 m southeast of the premises boundary
Bush forever area	Approximately 110 m northeast of the premises boundary
Surface waterlines	WUNGONG BROOK – approximately 2.1 km east of the premises boundary
Right in Water and Irrigation Act groundwater area	Perth Groundwater Area – premises located within the Perth Groundwater area
Groundwater	Depth to groundwater at the site is approximately 3 mBGL.

Figure 3: Distance to sensitive receptors

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3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant 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 applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Works approval W3191/2026/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the operation of the premises. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 3: Risk assessment of potential emissions and discharges from the premises during construction and operation

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Installation of bulk oil tank Installation and connection of a below ground oil water separator Vehicle movements.	Dust	Air / windborne pathway causing impacts to health and amenity	Residential Premises ~ 250 m south-west of the premises boundary Industrial premises ~ 210 m south of the premises boundary	Refer to Section 3.1	C = Slight L = Rare **Low Risk**	Y	Condition 20	The Delegated Officer considers that dust emissions can be adequately regulated by section 49 of the EP Act during construction.
	Noise			Refer to Section 3.1	C = Slight L = Unlikely **Low Risk**	Y	Condition 20	The Delegated Officer considers noise emissions can be effectively regulated by the *Environmental Protection (Noise) Regulations 1997*.
Operation (including time-limited-operations operations)								
Storage of waste oil on in the self-bunded, double skin tank	Noise	Air / windborne pathway causing impacts to health and amenity	Residential Premises ~ 250 m south-west of the premises boundary Industrial premises ~ 210 m south of the premises boundary	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	Conditions 1, 2, 3, 6, 7, 15 and 20	The provisions of the *Environmental Protection (Noise) Regulations 1997* apply
	Hydrocarbon vapours, hazardous vapours (including PCB vapours)	Air / windborne pathway causing impacts to health and amenity	Residential Premises ~ 250 m south-west of the premises boundary Industrial premises ~ 210 m south of the	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 6, 7, 15 and 20	The Delegated Officer considers that the waste oil will be stored in a self-bunded, double-skin storage tank designed in accordance with AS 1940 fire protection and containment principles. The

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
			premises boundary Priority 3 –ecological community ~ 125 m northeast of the premises boundary TECs ~ 220 m northeast of the premises boundary Threatened and Priority flora ~ 390 m south west of the premises boundary DBCA legislated Lands and Waters ~ 110 m north east of the premises boundary Bush forever area ~ 110 m north east of the premises boundary					Delegated Officer also reviewed the additional controls proposed by the applicant and determines that, collectively, these measures minimise the risk of hydrocarbon vapours and other hazardous vapours (including PCB vapours) being released from the waste oil storage, and are adequate to ensure the applicant can effectively manage these risks.
	Odour (from hydrocarbon)	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 6, 7, 15 and 20	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating odour emissions during time limited operations.
	Fire	Air / windborne pathway causing impacts to health and amenity		Refer to Section 3.1	C = Major L = Rare **Medium Risk**	Y	Conditions 1, 2, 3, 6, 7, 8, 13, 14, 15 and 20	The Delegated Officer has identified the potential impacts associated with air emissions generated during a waste oil fire and has noted that a fire prevention and management plan can assist to mitigate the risks of fire. The licence holder will be required to prepare and implement a Fire and Emergency Management plan (condition 15) that is

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
								consistent with AS3745.
	Oil spills / leaks	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Ramsar and wetlands Premises located within RIWI Perth Groundwater area Wungong Brook ~ 2.1 km east of the premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 6, 7, 8, 9, 10, 12, 15, 16, 17 and 20	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating oil spills/leaks emissions during time limited operations.
	Contaminated stormwater runoff			Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 1, 2, 3, 6, 7, 9, 10, 11, 12 15 and 20	The Delegated Officer notes that no information has been provided regarding the treatment performance or level of hydrocarbon removal achieved by the spillceptor. Due to this uncertainty, the Delegated Officer has determined that it is necessary to regulate total recoverable hydrocarbons in the treated water, and to specify monitoring locations and parameters for stormwater monitoring. This will enable verification that stormwater has been treated to an appropriate standard before it is discharged into the existing stormwater network during the time-limited operations.
	Fire water			Refer to Section 3.1	C = Major L = Rare	Y	Conditions 1, 2, 3, 6, 7, 13, 14,15	Condition 15 of the works approval requires the implementation of a Fire and

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of works approval	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
					Medium Risk		and 20	Emergency Management Plan to ensure that firewater generated during emergency events does not enter stormwater systems or cause off-site contamination..

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

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 3 February 2026	None received	N/A
Local Government Authority (City of Armadale) advised of proposal on 9 February 2026	The City of Armadale responded on 09/02/2026 confirming that the application includes appropriate engineering controls for the storage of bulk oil, including spill management measures and the installation of a below-ground oil–water separator to manage stormwater runoff. The City advised that these measures provide sufficient controls for oil storage and the management of potential spills, and therefore no further requirements are imposed by the City.	Noted.
Applicant was provided with draft documents on 5 March 2026	On 8 April 2026, the applicant advised that they have no comments on the draft package W3191/2026/1.	Noted.

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

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.