

Decision Report

Application for works approval

Division 3 Part V of the Environmental Protection Act 1986

Works approval	W6505/2021/1
Applicant	Simon Robert James Doleman
DWER file number	DER2020/000564
Premises	SJD Engineering 3/28 Vale Street MALAGA WA 6090
	Legal land description – Lot 3 on Plan 29131
Date of Report	1 July 2021
Status of report	Final

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1. **Decision summary**

This report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W6505/2021/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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.

2.2 Application summary and overview of premises

On 9 November 2020, Simon Doleman (the applicant) submitted an application for a works approval under section 54 of the *Environmental Protection Act 1986* (EP Act) to construct and operate a chrome plating facility at an existing engineering workshop located within the Malaga industrial area.

The prescribed activity relates to category 48 (metal finishing) and assessed production capacity under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which is defined in works approval W6505/2021/1. The infrastructure and equipment relating to the prescribed activity and associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in below.

This assessment does not consider other activities being conducted within the existing engineering workshop located on the premises.

2.3 Overview of premises

2.3.1 Construction and operational aspects

The applicant operates an existing engineering workshop at the premises and is proposing to add a chrome plating facility that will remove hard industrial coatings, repair, and provide new chrome coatings for manufactured components for the mining, agriculture, and marine industries.

The process will involve chrome plating manufactured parts in a tank containing chromic acid and passing a current through the items to be plated. Items will be washed in a second tank and allowed to drip dry over the tank. A power rectifier will be used to convert AC to DC current for the plating process, and a tank of potassium sodium tartare tetrahydrate will be used as the reducing agent for effective chrome plating.

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 plating facility will be used as required with an expected maximum output of about 100 tonnes per annum, based on current purchasing of chrome plated manufactured goods from other businesses.

Infrastructure relating to category 48 (metal finishing) activities which will be constructed within the existing building on the premises is as follows:

- 1.8 kL steel chrome plating holding tank;
- 1.5 kL potassium sodium tartrate tetrahydrate holding tank;
- 2x 1 kL wash / spill emergency tanks;
- 2x 1 kL emergency transportable tanks;
- 1x sump pump, and
- Brick containment bund with chemical sealant, in which tanks will be located.

3. Environmental setting

The premises is located within a wellhead protection zone for a Water Corporation managed drinking water bore located within the superficial aquifer, about 150 m north of the premises. The premises is also within a Priority 3 public drinking water supply area (PDWSA) that is proclaimed under the *Metropolitan Water Supply, Sewerage and Drainage Act 1909.* The delegated officer notes that metal production and finishing facilities are considered an incompatible land use within public drinking water supply areas (DoW 2016).

DWER historic groundwater data from Reference Bore 61610210 located 1.3 km to the west indicates that maximum seasonal groundwater levels are 1 metre below ground level (mbgl). A perched seasonal wetland about 150 m to the northeast of the premises confirms that seasonal groundwater is close to the surface.

4. Consultation

The application was referred to relevant public authorities and advertised for public comment on the department's website during February and March 2021. No public submissions were received in the timeframe specified.

The applicant was provided a copy of the draft works approval and decision report on the 25 June 2021. The applicant waived the comment period and provided no comments on the 28 June 2021.

4.1 **Public authorities**

Water Corporation advised it objects to the proposed development in the current location, being within a PDWSA and a wellhead protection zone of an operational drinking water production bore.

The City of Swan advised the proposed works were exempt from requiring planning approval, as they will be conducted within an existing building that will not affect its external appearance.

5. 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.

5.1 Source-pathways and receptors

5.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises construction and operation which have been considered in this 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.

Emission	Sources	Potential pathways	Proposed controls
Construction			
Noise	Installation of tanks and brick bund (containment)	Air/windborne pathway	Construction will take place inside an existing building. Construction occurs within "day-time" hours (business operational hours area from 6:00am to 5:00pm Monday to Saturday).
Operation			
Spills and leaks of chemicals or wastewater	Chemicals from chroming operations including plating, washdown operations and cleaning of tanks	Runoff from hardstand areas, reaching shallow groundwater and nearby surface water features (P3 catchment)	Containment bund and all tanks will be located within an enclosed building with an existing concrete floor. Chrome plating and potassium sodium tartare tetrahydrate tanks to be constructed in accordance with <i>Australian Standard</i> <i>1692 – 2006 (AS1692) Steel tanks for</i> <i>flammable and combustible liquids</i> . Wash / emergency spill and transportable emergency tanks to be constructed in accordance with <i>Australian Standards</i> <i>AS3780-2008 (AS3780) the storage and</i> <i>handling of corrosive substances</i> . Four tanks to be located within a bund constructed in accordance with <i>AS3780,</i> including the walls and floor of the containment area. Bunded area is double bricked with an internal protective rubber coating/fusion bonded epoxy. The floor is 200mm thick reinforced concrete slab. Containment bund wall is 1 metre in height above the concrete surface level. The bunded area and floor are lined with chemically resistant hexavalent chromium and sealed with a water proofing sealant. Bunded area has a 110% volume (1.98 kL) of the largest tank (chromic acid tank). Spills within the containment area are pumped into the chrome tank. Two transportable emergency tanks located within the enclosed building within the premises for chromium solution spills. The chrome tank, optassium sodium tartrate

Table 1:	Proposed	applicant	controls

Emission	Sources	Potential pathways	Proposed controls
			tetrahydrate tank and two wash/emergency spill tanks are located within the bunded containment area The chrome plated materials are washed and drip dried over the wash/emergency spill tanks. All washdown water is recycled back into chrome plating tank. All acids and sludges not required in the process are removed from the premises by a licensed contractor. All chemical spills will be cleaned immediately using a neutralizing agent and a spill kit. All situations requiring removal of liquid chemicals will be placed inside transportable/emergency tank and be tested for strength and removed off site. Sump pump located within the containment
Air emissions Chromic acid fumes Odour	Chromic acid tank	Air/windborne pathway	Use of a non-perflourooctane sulphonate (PFOS) fume suppressant at a rate of 2L per 1,000L of chromic acid. 250ml of spray suppressant added to chromic acid tank every 10,000 ampere hours of operation. Tanks will be installed inside an existing building which is completely enclosed. Workshop ventilation to disperse fume emissions.

5.1.2 Receptors

In accordance with the *Guideline: Risk Assessments* (DWER 2020), the delegated officer has excluded employees, visitors and contractors of the applicants 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 provides a summary of potential human and environmental receptors that may be impacted because of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2021)).

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

Human receptors	Distance from the enclosed building of the prescribed activity
Closest residential receptor in Malaga	58 m east from the building of the premises activity which is located within residential suburb of Malaga.
Industrial receptors within Malaga Industrial area	Immediately adjacent to the north, west and south from the building of the premises activity
Closest public recreational area is Crown Reserve 45429	115 m northeast from the building of the premises activity

Environmental receptors	Distance from prescribed activity
Underlying groundwater (non-potable purposes)	Mirrabooka Groundwater Area, Sub area Ballajurra, Perth-Superficial Swan aquifer Historic maximum groundwater 1 metre below ground level (mbgl) (34 m Australian Height Datum (AHD))
Priority 3 (P3) Public drinking water supply area (PDWSA) Well head protection zone for Water Corporation Bore drinking water (610610303, Mirrabooka Production Bore M35-88)	Premises is within a P3 PDWSA proclaimed under <i>the Metropolitan Water Supply, Sewerage</i> <i>and Drainage Act 1909,</i> and lies within the Gnangara Underground Water Pollution Control Area. The premises is located in a well head protection zone. A drinking water bore managed by Water Corporation is located 150m north of the premises within the superficial aquifer. The PWDSA protects the quality of drinking water used by Water Corporation for domestic supply in the Perth metropolitan area. Water Quality Protection Note 25 (WQPN 25) (DoW 2016) lists that metal production / finishing industries are an incompatible land use within P3 areas.
Threatened Ecosystem Community (TECs)	Within buffer of Banksia woodlands Swan Coastal Plain (SCP) TEC

5.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and consider potential source-pathway and receptor linkages as identified in Section 5.1. 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 5.1), 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 W6505/2021/1 that accompanies this 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 ongoing operation of the Premises i.e. chrome plating activities. A risk assessment for the operational phase has been included in this 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 Event								Applicant		Conditions ²	
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	Consequence	Consequence Llikelihood	Llikelihood	Risk rating ¹	controls sufficient?	Justification for additional regulatory controls	of works approval/
Construction		I	I					1		1	
Construction and installation of 6 tanks and containment bund	Noise	Air/windborne pathway causing impacts to amenity	Industrial businesses adjacent north, west and south. Residences 58 m west and local park 115m northwest	Refer to Section 3.1 Table1	Slight: minimal impact at a local scale	Rare: will only occur in exceptional circumstances	Low	Ŷ	The Delegated Officer has considered that construction will occur during daylight hours only, will be for a minimum period and occur within an enclosed existing building within an existing industrial area. The Environmental Protection Act (Noise) Regulations 1997 are sufficient to regulate noise emissions.	No Conditions	
Operation -including time-limited operations										1	
	Emissions from chromic acid fumes and other vapors			Refer to Section 3.1 Table 1	Minor low-level impact to amenity at a local scale	Rare: will only occur in exceptional circumstances	Low	Y	The Delegated Officer considers the proposed applicant controls consisting of PFOS fume suppressants used when chrome plating is undertaken, 250ml of spray suppressant added to chromic acid every 10,000 ampere hours of operation, and the location of the facility within an enclosed building are sufficient to minimise the risk of vapors, fumes, and aerosols.	Condition 6	
	Air/windborne pathway causing impacts to health and amenity Industrial busine adjacent north, v south. Noise Air/windborne pathway causing impacts to health and amenity Industrial busine adjacent north, v south.	adjacent north, west and south. Residences 58 m west and local park 115m porthwest	Refer to Section 3.1 Table 1	Minor low-level impact to amenity at a local scale	Rare: will only occur in exceptional circumstances	Low	Y	The Delegated Officer considers the low storage volumes (1.8kL of chromic acid), small-scale operation (100 tonnes per year) and the applicant's controls that include the facility is within an enclosed building are sufficient to minimise the risk of noise.	Condition 6		
	Odour	local park 115m northwest		Refer to Section 3.1 Table 1	Minor low-level impact to amenity at a local scale	Rare: will only occur in exceptional circumstances	Low	Y	The Delegated Officer considers the low storage volumes (1.8kL of chromic acid), small-scale operation (100 tonnes per year) and the applicant's controls that include the use of PFOS fume suppressants used when chrome plating is undertaken, 250ml of spray suppressant added to chromic acid every 10,000 ampere hours of operation and location of the facility within an enclosed building are sufficient to minimise the risk of odour.	Condition 6	
Chrome plating operations	Leaks and spills of chemical liquids	Failure of containment structures resulting in leaks and spills generating overland runoff through carpark drainage potentially causing contamination to superficial groundwater and soils. Contamination of groundwater within a Priority 3 PWDSA / wellhead protection area and public drinking water bore	Mirrabooka Groundwater Area, Sub area Ballajurra, Perth-Superficial Swan aquifer Groundwater 1 mbgl Public drinking water bore located 150m north.	Refer to Section 3.1 Table 1	Major High level onsite impacts, mid level local scale offsite impacts,, drinking water quality ANZECC exceedances for environment/public health at risk of not being met (public drinking water source)	Rare: will only occur in exceptional circumstances	Medium acceptable subject to regulatory controls.	Ν	 The proposed category 48 metal finishing facility will process up to 100 tonnes per annum within a Priority 3 PDWSA, well head protection zone and is located 150m north of a public drinking water supply superficial bore. WQPN 25 states that the proposed use is not compatible within a Priority 3 PDWSA. Thus, the proposed works are located within a sensitive environment that does not comply with WQPN 25. The Delegated Officer considers that poor construction can led to containment failure once operational. Where the failure of containment infrastructure can result in leaks and spills of chemicals and acids, that could runoff from the facility into the carpark and stormwater system and infiltrate into soil and contaminate public drinking water resources. The applicants operational controls consist of a sump pump located within the containment bund; all four tanks are located in the containment bund; chrome plated material are dripped and washed over wash tanks; acid and waste are removed from premises when not required, by a licenced waste controller; spills are immediately neutralized, recovered and disposed of within and outside of the containment area with a spill kit located onsite; acid wastes and sludge are removed from the premises by a licenced contractor; wash down water is recycled back into the chrome tank to make a closed loop system. The Applicants constructions controls consist of: all tanks are built to AS1692-2006 and / or AS 3780-2008; floor of the containment bund is 200 mm of reinforced concrete; the containment bund will height is 1 metre; the containment bund is double bricked and lined with a rubber coating, the bricked containment bund and tanks requires further controls to sufficiently minimise the risk of containment bund and tanks requires further controls to sufficiently minimise the risk of containment bund and tanks requires further controls to sufficiently minimise the risk of containment bund and tanks requires forther containment bund shall be	Condition 1 Condition 1 Condition 2 Condition 3 Condition 6 Condition 7	

Risk Event				Concomucinos			Applicant		Conditions ²	
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	Consequence	Llikelihood	Risk rating ¹	controls sufficient?	Justification for additional regulatory controls	of works approval/
									 largest tank (1.8 kL chrome plating tank) plus 25% of the capacity of all stored containers within the bund containment area (this includes 1.8 kL chrome plating tank, 1.5kL potassium sodium tartrate tetrahydrate, two 1 kL wash/emergency spill tanks). A qualified engineer to certify that the bricked containment bund is built to hold 110% of the largest storage vessel plus 25% of the capacity of all stored container (total 3.305 kL) before the chrome plating facility is operated under time limited operations. A civil or structural engineer to certify the bricked containment bund is built to works approval W6505/2021/1 specifications at two stages in the construction. Certification at stage 1 on the completion of the double bricked bund to certify that the volume of the containment bund complies and that the internal protective rubber coating applied is fused with bonded epoxy. Certification at stage 2 on the completion of the bricked containment bund and installation of tanks. 	

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

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

6. Decision

The Delegated Officer has determined the proposal for a chrome electroplating facility at the premises does not pose an unacceptable risk of impacts to on- and off-site receptors. This determination is based on the following:

- the proposal constitutes adding a new metal finishing process at an existing engineering workshop;
- the proposed small scale of the facility (100 tpa); and
- the proposed engineering controls, with additional regulatory controls added, are considered sufficient for ensuring an acceptable level of risk is maintained.

To minimise the potential for environmental impacts the applicant has proposed the following engineering controls:

- holding tanks for chromic acid and potassium sodium tartrate to comprise mild steel manufactured to relevant Australian Standards (AS 1692) and an outside chemical resistant fibreglass coating;
- holding tanks will be located within an above ground sealed containment bund, constructed of concrete bricks and lined with a chemical resistant coating;
- the containment bund will be sufficiently sized to contain at least 110% of the largest holding tank (1.98 kL), in the event of a spill or leak; and
- all chrome plating activities will be conducted within the containment bund area.

In considering the sensitivity of the surrounding environment (i.e. PDWSA, wellhead protection zone), the Delegated Officer has determined to include the following additional regulatory controls, which will be imposed on the works approval as they are considered critical for maintaining an acceptable level of risk:

- increase in the capacity of the containment bund to include, in addition to 110% of the largest tank, at least 25% of the other four tanks within the bund (3.305 kL);
- specifying that the permeability of the containment bund must be at least 1×10^{-9} m/s;
- requiring the use of construction materials for the containment bund that are substantially immune to attack by any corrosive substance they may be required to contain; and
- construction of the containment bund must be certified as being constructed to specification and being fit-for-purpose, prior to the commencement of chrome plating activities.

The works approval also includes conditions for time limited operations where the applicant can commence operating the facility upon submission of an Environmental Compliance Report at the completion of works in accordance with the works approval. During the time limited operations phase (up to 6 months) the applicant will need to apply for a licence.

The Delegated Officer expects the time limited operations requirements on the works approval will form part of the conditions of a future licence, and subject to consideration of a licence application and an Environmental Compliance Report. A future licence will consider the requirement for annual integrity inspections to reduce the risk of spills and leaks of containment infrastructure.

7. Conclusion

Based on the assessment in this 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 (DWER) 2020, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
- 2. DWER 2020, Guidance Statement: Risk Assessments, Perth, Western Australia.
- 3. DER 2015, Guidance Statement: Setting Conditions, Perth, Western Australia.
- 4. Department of Water and Environment Regulation (DWER) 2019 Guideline: Guide to Licensing, Perth, Western Australia
- 5. Department of Water (DOW) 2016 Water Quality Protection Note No. 25, Land use compatibility table for public drinking water source areas Perth, Western Australia

Appendix 1: Application validation summary

VALIDATION CHECKLIST: WORKS APPROVAL APPLICATIONS

SECTION 1: APPLICATION SUMMARY						
Application type						
Works approval						
Date application received	9 November 2020					
Applicant and Premises details						
Applicant name/s (full legal name/s)	Simon Robert James Dolem	an				
Premises name	SJD Engineering					
Premises location	Unit 3 28 Vale Street, MALA	GA, WA 6090				
Local Government Authority	City of Swan					
Application documents						
HPCM file reference number:	DER2021/000564					
Key application documents (additional to application form):	SJD Engineering – Metal Fil Application Document Lease Details	nishing Facility Works Approval				
Scope of application/assessment						
Summary of proposed activities or changes to existing operations.	Works approval for Category 48: metal finishing for a throughput of 100 tonnes. The proposal is for the construction and commissioning of a chrome plating facility. Construction of an above ground bund using concrete bricks and lined with a chemical resistant coating. Four tanks will be placed within the new bunded area to store one tank of chromic acid for plating, one tank for potassium sodium tartrate tetrahydrate and four tanks for water / emergency tanks. A sump pump will be positioned within the bund area for spill management.					
Category number/s (activities that cause th	e premises to become prescril	bed premises)				
Table 1: Prescribed premises categories						
Prescribed premises category and descri	Proposed production or design capacity					
Category 48 - Metal finishing: premises o cleaned or metals, plastics or metal or pla electroplated, anodized, coloured or othe	n which metals are chemically astic products are plated, rwise coated or finished.	Actual throughput of 100 tonnes				
Legislative context and other approvals						
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes 🗆 No 🛛	Referral decision No: Managed under Part V □ Assessed under Part IV □				

Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes 🗆 No 🛛	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes 🗆 No 🛛	Reference No:
		Certificate of title □
Has the applicant demonstrated	Yes 🗵 No 🗆	General lease \boxtimes Expiry: June 2022, with two year option
		Mining lease / tenement Expiry:
		Other evidence Expiry:
Has the applicant obtained all relevant		Approval:
planning approvals?		Expiry date:
	Yes LINO LIN/A ⊠	The Applicant has applied for Planning Approval from the City of Swan.
Has the applicant applied for, or have an		CPS No: N/A
existing EP Act clearing permit in relation to this proposal?	Yes 🗆 No 🛛	No clearing is proposed.
Has the applicant applied for, or have an		Application reference No: N/A
existing CAWS Act clearing licence in relation to this proposal?	Yes 🗆 No 🛛	Licence/permit No: N/A
		No clearing is proposed.
Has the applicant applied for, or have an		Application reference No:
relation to this proposal?	Yes 🗆 No 🛛	Licence/permit No:
		Licence / permit not required.
		Name: N/A
Deep the proposal involve a discharge of		Туре:
waste into a designated area (as defined in section 57 of the EP Act)?	Yes 🗆 No 🗵	Has Regulatory Services (Water) been consulted?
		Yes 🗆 No 🗆 N/A 🗆
		Regional office:
		Name: Gnangara Underground Water Pollution Control Area
		Priority: P3
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes 🗵 No 🗆	Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)?
		Yes 🛛 No 🖾 N/A 🗆
		Consultation with Water Source Protection (Science and Planning) is recommended.

Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous</i> <i>Goods Safety Act 2004, Environmental</i> <i>Protection (Controlled Waste)</i> <i>Regulations 2004, State Agreement Act</i> <i>xxxx</i>)	the Premises subject to any other Acts r subsidiary regulations (e.g. <i>Dangerous</i> Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxx)		Chrome acid is class 8 corrosive liquid. Dangerous Goods Safety Act 2004 requires licensing at 10,000L. The Applicant proposes to have only 1,000L.	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes □	No ⊠		
Is the Premises subject to any EPP requirements?	Yes ⊏	No ⊠		
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes □	I No ⊠	Site is adjacent to Lot 100 Weir Rd (power substation) that has a remediated for restricted use classification	
			Site is opposite Lot 330 and 336 Winchester Place, Ballajurra, that has an incomplete report status.	
SECTION 2: RECEPTORS				
Within the town of Malaga		•		
Human receptors		Distance from activity / prescribed premises		
Residential Premises (closest)		0.66 km from the Premises activity		
Industrial Premises (closest)		0.10 km from the Premises activity		
Environmental receptors		Distance from activity / prescribed premises		
Crown reserve 45429 Reserve 10633		0.48 km from the Premises activity		
Local park		0.48 km from the P	remises activity	
Local park Underlying groundwater (non-potable purp	oses)	Mirrabooka Groundwate Superficial Swan aquife Historic maximum grour	remises activity er Area, Sub area Ballajurra, Perth- r ndwater 1mbgl (34 m AHD)	
Local park Underlying groundwater (non-potable purpo PDWSA/RAMSAR wetlands	oses)	0.48 km from the P Mirrabooka Groundwate Superficial Swan aquife Historic maximum grour Within Gnangara Under Within protection zone f	remises activity er Area, Sub area Ballajurra, Perth- r ndwater 1mbgl (34 m AHD) ground Water Pollution Control Area or PDWSA	