



Application for Works Approval

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

Works Approval Number	W6870/2023/1
Applicant	Advanced Pet Care of Australia Pty Ltd
ACN	087 757 551
File number	DER2023/000347
Premises	<p>Advanced Pet Care 43 – 49 Dooley St, NAVAL BASE WA</p> <p>Legal description Lot 69 on Deposited Plan 417361 As defined by the premises map attached to the issued works approval</p>
Date of report	24 April 2025
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 operation of the premises. As a result of this assessment, works approval W6870/2023/1 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://www.wa.gov.au/service/building-utilities-and-essential-services/integrated-essential-services/dwer-regulatory-documents>.

2.2 Application summary

On 23 May 2023, Advanced Pet Care of Australia Pty Ltd (the applicant, APCA) submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act). The application is for construction works to establish a new pet food manufacturing facility within an existing building on Lot 69 on Deposited Plan 417361. The new facility will expand the applicant's existing pet food manufacturing facility located at 40 Lionel St, Naval Base (Lot 50 on Diagram 89697) and operated under licence L6765/1997/12. The expansion works will occur at 43-49 Dooley Street, Naval Base (the premises) directly adjacent to the existing manufacturing facility. The premises is approximately 5.5 km north-west of Kwinana.

The premises relates to Category 23: Animal feed manufacturing with an assessed production capacity of 20,000 tonnes per annum under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6870/2023/1. 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 W6870/2023/1.

The application included a request for an amendment to licence L6765/1997/12 to alter the premises boundary to include the new manufacturing facility. The applicant was advised that a separate licence amendment application is required which should be applied for when construction of the new facility is complete.

2.3 Background and application overview

The applicant currently operates a three tonne per hour pet food manufacturing facility which produces up to 22,000 tonne per annum (tpa) at 40 Lionel Street, Naval Base (existing facility). It consists of a bulk dry ingredient storage silo, primary milling, extrusion, packaging lines and a biofilter odour control unit. The location in Naval Base is within the Kwinana Industrial Area precinct and zoned 'general industry' with surrounding premises also zoned 'general industry'.

The proposed new facility is intended to become the main production line with a higher production capacity, improved energy efficiency and pollution controls. The existing facility will remain operational as a secondary production line for manufacturing of specialised recipes which will be manufactured in small batches (1.5 - 3 tonnes) as required.

The applicant states that the existing raw materials receival infrastructure within the existing facility will service the production needs of the existing and proposed new facility.

The new facility will have a production rate of 10 tonnes per hour and is proposed to operate Monday to Friday between 6am to 2pm with an annual two week plant closure. Based on the

operational profile the applicant expects the new facility will produce 20,000 tonnes per annum. The applicant expects the combined existing and new facilities will produce approximately 26,000 tonnes per annum based on the proposed operational timeframe.

3. Manufacturing process and infrastructure

The applicant proposes to establish a second production line primarily within existing buildings on the premises. It will comprise a new blending line in one existing building, an extrusion line and utilities plant room in another, a new building for blower, chiller and dehumidifiers and another building to enclose silos for wheat and milled feed storage. The pet food manufacturing process undertaken on the premises will comprise the following activities.

- **Batching and mixing** – Dry ingredients are weighed in a batch process according to the product recipe, these are transferred via enclosed conveyors and elevators to the mixer. The ingredients are then mixed to a homogenous blend.
- **Milling** – Dry ingredients are batched and ground to a homogenous dry mixture through blending line 2 prior to being transferred via an enclosed pneumatic conveyor system to extrusion line 2. Milled dry feed can be stored in storage silos outside the blending building pending transfer to the extrusion line.
- **Transfer** – The milled dry feed is transferred pneumatically to the extrusion line feed bin, then fed into a hopper where the material is weighed and fed into the preconditioner.
- **Pre-conditioning** - At the preconditioner, water, steam, oils & other additives are added to the dry feed as determined by the recipe to form a wet mixture. Liquids are delivered and stored in IBC's or drums and are connected via a hose to 12.5 kL holding tanks and the liquid is pumped to the pre-conditioner. Steam is supplied from a natural gas fired 2 MW boiler. The wet mixture is then fed into the extruder via an enclosed screw.
- **Extrusion** – Wet mixture is pushed through a die (metal plate with holes the size and shape of the kibble) under pressure and a knife slices the product to form kibble. The kibble is then pre-heated via a heat exchanger then pneumatically conveyed into a cyclone where the kibble drops to the bottom and is fed into a dryer and air is extracted from the top and directed to an Aerox non thermal oxidiser system (NTO) for odour treatment prior to discharge from the building.
- **Drying** - Kibble is fed into a gas fired dryer and dried to a moisture content of ~10% then enters the feed hopper bucket elevator where it passes through a sifter to remove any fines. There are two additional dryer discharge cyclones which extract and treat air from the dryer prior to being discharged through the NTO for odour treatment.
- **Coating and Cooling** - Kibble is then transferred to a storage bin and discharged into the coating drum where it is sprayed with palatants (tallow and digestes). Kibble is then transferred to the counterflow cooler for cooling to a suitable storage temperature. Air is extracted from the cooler and undergoes cyclonic filtration prior to being discharged through the NTO for odour treatment.
- **Storage and packing** - Kibble is then transferred to 24.5 m³ storage bins (10 in total) within the warehouse for storage until it is sent to the automated packing line. There is option to fill these storage bins with bulk bags from extrusion line 1 (existing facility) to allow flexible storage. From storage bins there is another sifter to further remove fines prior to being transferred to the packing line comprising a bagging machine (8-25 kg bags), palletiser and wrapper.

Blending line 2 will be established within a separate existing warehouse on the premises for milling and mixing activities. Two silos outside the building will be used for wheat storage and an additional three silos will be installed for milled feed storage within a building structure (to be constructed). The blending line will include a wheat elevator, hoppers, mixers, hammer mill, sieve and micro ingredient

addition. The blending line is equipped with enclosed transport systems and dust filters which treat air flows prior to discharge to atmosphere.

The production line (extrusion line 2) is equipped with multiple air extraction systems designed to direct air through either cyclones or dust filters and then to two Aerox non thermal oxidisers (NTO) for odour reduction before being discharged into the atmosphere through an exhaust stack. Fans facilitate the extraction at various key points within the production line. Additionally, air is extracted from hoppers, bucket elevators, and sifters, and passes through dust filters prior to entering the Aerox system. Air is additionally extracted from dryer feed and discharge cyclones as well as the cooler cyclones, undergoing cyclonic filtration before being discharged through the Aerox system.

The facility will include a slurry rework system. The system will allow any off-spec product produced during facility start up to be captured in containers and added back into the process via the pre-conditioner to reduce waste. Additionally, any dust/fines captured from dust filter cleaning mechanisms, cyclones and sifters will also be captured in containers and recycled into the process stream through this system.

All raw materials (excluding wheat) will be received at the receival warehouse at the existing facility or an existing warehouse (Storage Shed Dry Raw Food) on the premises. The raw materials are packaged and will be transported to the blending or extrusion line via a forklift and added to the relevant process.

4. Air quality and odour impact assessment

The applicant engaged EAQ Consulting to assess the impact on air quality and amenity associated with air emissions and odour emissions from the proposed new production facility combined with the existing facility. A resulting Emissions Impact Assessment was provided with the application (EAQ Consulting 2024). The assessment included dispersion modelling undertaken using the CALPUFF dispersion model to predict ground level concentrations (GLC) of ozone (O₃), nitrogen oxide (as NO₂) (NO_x), carbon monoxide (CO) and odour at discrete locations in proximity to the premises. The selected locations are from the middle of the premises to a distance of 380 m from the premises as per Table 1.

The assessment did not include particulates with the reasoning provided in the assessment that the process will include an appropriate dust capture system, comprising cyclones and filters, which are expected to achieve an efficiency of 97-99% dust removal. The department considers this exclusion to be appropriate.

Odour was modelled both with and without treatment via the proposed Aerox NTO system to demonstrate the effect of the proposed odour control system. An odour assessment was also included as per the DWER *Guideline: Odour emissions* which included an operational odour analysis (OOA) to determine the risk of odour impacts subject to the proposed controls.

The model predicted maximum GLC are displayed against relevant air quality guideline values in Table 1. Based on the predicted GLC and the odour analysis the assessment concluded that:

- NO_x and CO are well below the guideline values for ambient air;
- O₃ is not a risk factor from the proposed facility; and
- Odour emissions when treated are of a low risk from the existing and proposed facility and odour nuisance at the nearest industrial receptor is considered to be negligible subject to operation of the proposed Aerox odour control system.

Table 1: Model predicted maximum ground level concentrations

Receptor location and distance from centre of the premises	Pollutants and air guideline values							
	O ₃ 1-hr	O ₃ 4-hr	NO ₂ 1-hr	NO ₂ Annual	CO 1-hr	CO 8-hr	Odour 1-hr 99.5 th percentile	
							Untreated	Treated
	196	157	226	56	30,000	10,000	NA	
	µg/m ³						ou.m ³	
Gatehouse on Lionel Street (75 m)	16.9	15.6	117	10	21	13	8.4	2.1
Middle of Site (0 m)	17.1	16.8	215	13	31	17	8.3	2.1
Western Adjacent Boundary (65 m)	19.7	15.0	68	7	14	8	8.1	2.0
Eastern Adjacent Boundary (65 m)	14.8	14.1	127	15	26	15	7.3	1.8
Corner of Lionel and Henry Street (200 m)	25.2	18.5	54	3	20	10	10.8	2.7
Corner of Dooley and Henry Street (200 m)	16.5	13.2	46	3	17	12	7.4	1.8
Corner of Lionel Street and Lee Road (380 m)	13.9	9.6	39	1	13	8	4.5	1.1
Corner of Dooley Street and Lee Road (315 m)	15.4	12.4	31	1	10	8	5.2	1.3

DWER reviewed the applicant's modelling assessment for NO₂, O₃ and CO and found it is generally meets the requirements of DWER's *Air Quality Modelling Guidance Notes*. There are some limitations in the approach adopted were not considered to impact the assessment outcomes. Based on the modelling assumptions, the maximum predicted GLC for NO₂, O₃ and CO in isolation are below air quality guidelines and the assessment conclusions are considered reasonable. It was noted that cumulative concentrations as required by the *Air Quality Modelling Guidance Notes* were not assessed although the cumulative concentration risk is considered to be low based on a sensitivity analysis undertaken.

Odour dispersion modelling is not considered to be a reliable indicator of odour impact extent owing to inherently large uncertainties and should not be used as the only analysis tool. Consequently, the department does not accept odour modelling against criteria to inform conclusions about the potential odour nuisance from a facility. Comparative modelling as outlined in the *Guideline: Odour emissions* (DWER 2019) can however be used to show relative variation in predicted odour GLC. The predicted GLC are included here to demonstrate the difference between treated and untreated odours emitted from the new facility. The model predicts a reduction of approximately 75% at all locations. The odour footprint is expected to remain within the surrounding industrial area and is not

expected to extend to residential receptors.

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 decision report are detailed in Table 2 below. Table 2 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Construction/ establishment of new pet food manufacturing facility adjacent to existing facility	Air / windborne pathway	<ul style="list-style-type: none">Works are primarily occurring within existing buildings on the premises.
Noise		Air / windborne pathway	
Operation			
Fugitive dust	Transfers, preparation (blending & grinding), processing and storage of dry materials	Air/ windborne pathway	<ul style="list-style-type: none">All dry ingredients (grains and legumes) are delivered in sealed packaging to the warehouse at the existing facility or the existing Dry Raw Feed Storage Shed on the premises where they are stored pending transport to the relevant process area.Wheat will be delivered into an intake hopper fitted with PVC strip curtains via tipper trucks and conveyed into storage silos.The pet food manufacturing infrastructure will be established within two existing enclosed buildings.Wheat and milled feed will be stored within enclosed silos with dust filters and level sensors to prevent spillage.All conveyors, screws and bucket elevators for the transfer of raw materials and product will be fully enclosed.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> Air flows within the blending line will be treated via dust filters or cyclones prior to discharge. Dust filters will be fitted with pulse controllers for automatic cleaning and differential pressure gauges to measure pressure drop across the filters. Pressure gauges will be monitored and faulty filter media will be replaced or blockages cleared when low or high readings are observed. Collected material from dust filters will be collected for processing. The premises is bituminised. Spills of dry raw material and feed will be cleaned up and transferred to containers for disposal.
Liquid raw materials or stormwater contaminated with those raw materials (i.e oils, food additives)	Storage tanks, IBCs and drums	Direct discharge to land and infiltration or overflow	<ul style="list-style-type: none"> Site is bituminised Oils and palatants to be stored in bunded IBC's and oil drums within an existing building. Tallow and poultry oil is to be stored within bunded storage tanks within an existing building. All liquid ingredients are transferred via a sealed pipe system. All liquid storage tanks are equipped with continuous level monitoring with high level alarms connected to the control room. Spill kits are available for immediate clean-up of small spills if required.
Point source odour and particulates	Preparation (blending & grinding at blending line 2), and processing of raw materials via extrusion line 2 to produce kibble (mixing, extruding, drying, coating and cooling)	Air/ windborne pathway	<ul style="list-style-type: none"> All conveyors, screws and bucket elevators for the transfer of raw materials and product will be fully enclosed. Fans will facilitate air extraction at key points (top of bucket elevators, feed bins and sifters) within the manufacturing line and direct exhaust air to one of three membrane dust filters prior to NTO treatment (extrusion line 2). Dust filters are rated to achieve 96% removal of dust to 0.5 microns. Dust filters will be fitted with pulse controllers for automatic cleaning and differential pressure gauges to measure pressure drop across the filters. Pressure gauges will be monitored and faulty filter media will be replaced or blockages cleared when low or high readings are observed.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> Collected material from dust filters will be collected for processing. Air is extracted from the extruder, dryer and cooler into cyclones for separation prior to NTO treatment. All extruder outputs are transferred to a cyclone for air extraction prior to entering the dryer. Cyclones are rated to achieve 85% removal of dust down to 0.5 microns. The feed manufacturing process and dust extraction systems will be monitored by a PLC system to ensure faults/malfunctions are responded to promptly. Extracted air is treated by an Aerox NTO system.
Air emissions: NO _x , CO, O ₃	Operation of a boiler and gas fired dryer to supply steam to the feed manufacturing process.	Air/ windborne pathway	<ul style="list-style-type: none"> Emissions from the boiler will be discharged via a stack approximately 2 m above the roofline of the building it is housed in. Expected emissions are CO typically up to 50 ppm and NO_x less than 70ppm and no SO_x or particulate emissions are expected (Australia odour management company)
Noise emissions	Preparation (blending & grinding at blending line 2), and processing of raw materials via extrusion line 2 to produce kibble (mixing, extruding, drying, coating and cooling)	Air/ windborne pathway	<ul style="list-style-type: none"> Manufacturing will be undertaken within existing enclosed buildings on the premises. The hammer mill will have a 17 dB silencer. The premises is located within the Kwinana Industrial area surrounded by industrial premises.

5.1.2 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 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emissions and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Industrial premises	Directly adjacent to the premises
Urban residential	2 km north (sub division)
Environmental receptors	Distance from prescribed activity
Wetland	1 km east
Bush forever site	1 km north

5.2 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 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 4.

Works approval W6870/2023/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence (or amendment to licence L6765/1997/12 for the existing facility) 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. pet food manufacturing activities. 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 4: Risk assessment of potential emissions and discharges from the premises during construction, commissioning and operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Construction								
Installation of pet food manufacturing facility (primarily within existing buildings)	Dust	Air / windborne pathway causing impacts to health and amenity	Nearest residence 2 km	Refer to Section 5.1.1	C = Minor L = Rare Low Risk	Y	NA	Given the nature and scale of the construction works (package), with the works occurring within an existing industrial area primarily within buildings and there being a separation distance to residential receptors of 2 km, the delegated officer does not foresee off-site sensitive receptors being unreasonably impacted by noise and dust during construction works at the premises.
	Noise							
Operation (including time-limited-operations operations)								
Raw material intake, handling, storage and transfer	Fugitive Dust	Air / windborne pathway causing impacts to amenity	Nearest residence 2 km	Refer to Section 5.1.1	C = Minor L = Unlikely Medium Risk	Y	1 and 6	Given that dry raw materials will be packaged or stored in silos with baghouse filters and all conveyors, screws and bucket elevators for the transfer of raw materials and product will be fully enclosed, the delegated officer consider the applicant's proposed controls will sufficiently mitigate the risk of fugitive dust impacts therefore imposed the applicant's controls as construction and operational requirements in the works approval.
	Liquid raw materials (oils, palatants, additives) and stormwater contaminated with these	Direct discharge to land and infiltration causing contamination	Underlying soils and groundwater	Refer to Section 5.1.1	C = Slight L = Unlikely Low Risk	Y	1	Given that the site is bituminised and liquid raw materials will be stored inside bunded tanks, IBCs or drums inside an existing warehouse with a concrete floor the delegated officer has determined that there is a low risk of contamination resulting from liquid raw materials. The applicant's controls were therefore included as construction and operational requirements in the works approval to ensure an acceptable level of risk is maintained.

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	Reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Feed manufacturing including operation of the boiler	Dust/particulate matter	Air / windborne pathway causing impacts to amenity	Nearest residence 2 km	Refer to Section 5.1.1	C = Minor L = Unlikely Medium Risk	Y	1 and 6	Given the manufacturing activities occur within existing enclosed buildings, all conveyors, screws and bucket elevators for the transfer of raw materials and product will be fully enclosed, and an air extraction system with air filters and cyclones will be operated the delegated officer has determined that the applicant has provided sufficient controls for dust during feed manufacture.
	Point source emissions (odour and O ₃)			Refer to Section 5.1.1	C = Minor L = Unlikely Medium Risk	Y	1 and 6	Non-thermal oxidisers use ozone (O ₃) to treat volatile organic emissions which may be a source of odour. The applicant's air quality modelling outcomes (section 4) indicate the risk of air quality impacts due to O ₃ levels are low. The proposed Aerox NTO is predicted to reduce odour by approximately 75% and the odour footprint is expected to be within the surrounding industrial area. The delegated officer believes that ozone and odour will be adequately managed by the proposed applicant controls to prevent impacts to air quality therefore included construction and operational requirements in the works approval for the proposed odour treatment system.
	Point source emissions (NO _x , CO and particulate matter)			Refer to Section 5.1.1	C = Minor L = Rare Low Risk	Y	1 and 6	The delegated officer has determined that the risk of air quality impact at sensitive receptors from combustion gas emissions will be low based on the proposed combustion infrastructure and the applicant's air quality modelling outcomes detailed in section 4.
	Noise			Refer to Section 5.1.1	C = Minor L = Rare Low Risk	Y	1 and 6	The delegated officer has determined that the risk of noise impact at sensitive receptors from noise emissions will be low based on the distance to receptors, the inclusion of noise control at the hammer mill and activities occurring within enclosed buildings. The applicant is required to ensure operational noise emissions comply with the Environmental Protection (Noise) Regulations 1997 at nearby industrial premises and residential locations.

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.

Note 3: Conditions 2-7, and 19 to 23 are all department imposed conditions required for compliance reporting, authorising time limited operation and associated emissions, and general complaint and record keeping requirements

6. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 8 January 2024	None received	N/A
Local Government Authority advised of proposal on 4 January 2024	The City of Kwinana advised that DA11135 was granted for the premises in November 2024.	The delegated officer noted the advice.
Applicant was provided with draft documents on 10 March 2025	Applicant responded on 4 April 2025 Refer to Appendix 1	Refer to Appendix 1

7. Decision

Based on the assessment in this decision report, the delegated officer has determined that the proposal to construct and operate a pet food manufacturing facility at 43-49 Dooley Street in Naval Base does not pose an unacceptable risk of impacts to public health or the environment. This determination is based on the following:

- The premises being located within the Kwinana Industrial Area with a separation distance of 2 km to the nearest residential area.
- The manufacturing infrastructure being established within existing enclosed buildings with suitable dust controls including dust filters, cyclones and extraction fans, enclosed transfer systems and raw material and feed being packaged or stored in silos.
- Inclusion of a non-thermal oxidiser odour control system for treatment of air flows prior to discharge to atmosphere.

Conditions have been imposed on the works approval based on the controls described above as they are considered reasonable and appropriate to maintain an acceptable level of risk.

8. 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.
4. SHEQ Management 2023, Advanced Pet Care Expansion Project Works Approval Application and Supporting Document (including later supplementary information submitted), Perth Western Australia

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 1 Table 1	<p>The applicant requested the following modifications:</p> <ul style="list-style-type: none"> • Change words air dyers to dehumidifiers and exclude chiller from building as they will be outside (item 1) • Include 2 x screw feeders and clarified the intake hopper would have PVC strip curtains (item 2) • Remove cooler and heat exchanger, add screw feeders, specified number of elevators and conveyors and change surge hopper to a discharge hooper (item 3) • Clarification that silencers are fitted to hammer mill filter vent (item 3) • Addition of dehumidifier, fans, chain conveyor and vibro dischargers (item 5) • Correction to volume and quantity of tanks and addition of dosing pump and hot water systems (item 6) • Correction of extrusion bin volume, specified number of bucket elevators and conveyors, and added vibro discharger, vacuum system, hopper and gravimetric feeder (item 7) • Correction to stack height (item 9) • Correction to kibble feed bin volume (item 10) 	<p>The delegated officer considered the proposed changes do not alter the risk assessment and updated the infrastructure table accordingly.</p>
Condition 6 table 2	<p>The height of the main stack is adjusted from 24 metres to 22 metres.</p>	<p>The delegated officer considered the proposed change does not alter the risk assessment and updated accordingly.</p>
Decision Report	<p>Correction of applicant name.</p> <p>Confirm operation hours are 6 am to 2 pm</p> <p>Clarification provided relating to batching, mixing, transfer, coating and cooling stages.</p> <p>Clarification provided regarding dust control during wheat delivery.</p>	<p>The decision report was updated based on the clarifications and corrections provided.</p>