



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Ecolab Pty Ltd T/A Nalco Australia

Licence: L5230/1993/12

Registered office: 2 Richardson Street
KWINANA WA 6167

ACN: 000449990

Premises address: Ecolab Pty Ltd
Lot 1 on Diagram 58692 Richardson Street
Kwinana Beach WA 6167

Issue date: Thursday, 31 July 2014

Commencement date: Wednesday, 6 August 2014

Expiry date: Saturday 5 August 2017

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by:

Nanette Schapel
Licensing Officer

Decision Document authorised by:

Cristina Angel
A/Manager Licensing



Contents

Decision Document	1
Contents	2
1 Purpose of this Document	2
2 Administrative summary	3
3 Executive summary of proposal	4
4 Decision table	5
5 Advertisement and consultation table	6
6. Emissions and discharges risk assessment framework	7
7. Appendix A	7

1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.4, 1.2.1, 1.2.2, 5.1.1, 5.1.2 and 5.3.1.

Licence conditions: 1.1.1-1.1.4, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions as a result of this application is justified in Section 4 of this document.

Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.



2

Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/>	
	New Licence <input checked="" type="checkbox"/>	
	Licence amendment <input type="checkbox"/>	
	Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	31	10,000 tonnes or more per annum
Application verified	Date: 17/06/2014	
Application fee paid	Date: 20/06/2014	
Works Approval has been complied with	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Compliance Certificate received	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Commercial-in-confidence claim	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.		



3 Executive summary of proposal and assessment

Ecolab Pty Ltd T/A Nalco Australia (previously licensed as Nalco Australia Pty Ltd) manufactures water treatment chemicals, primarily latex polymers and starch polymers, with a throughput of 700 tonnes per month. . The polymers remove impurities from the customer's effluent streams. The process involves the manufacture of polymers by dissolving the active product in water. The final product is in liquid form and delivered to the customers in 4,000 litre containers.

Both the latex and starch polymers produce a residual product layer on the inside of the plant mixing vessels, causing the vessel to be frequently washed. This wash water is Nalco's major waste stream, which is treated and currently transported off site. The site has been operational since 1978.

This Licence is the successor to licence L5230/1993/11 and continues to authorise the manufacture and storage of chemicals on site. As part of this re-issue, DER has not re-assessed the acceptability or impacts of emissions and discharges from the Premises or re-visited any existing emission control levels. No changes to the conditions on the previous licence have been made with the exception of the following:

- Name change from Nalco Australia Pty Ltd to Ecolab Pty Ltd T/A Nalco Australia;
- Update of new address of occupier to 2 Richardson Street, Kwinana Beach WA 6167
- Condition 4(a) monitoring bores defined in Attachment 2;
- Update to Attachment 2 map showing Premises Boundary, location of monitoring bores and soil sampling sites;
- Update of Annual Audit Compliance Report, changing the Department of Environmental Conservation to Department of Environment Regulation.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration		N/A	DER has issued a 3-year licence based on the DER Licensed Premises risk Appraisal Matrix which has assessed the site as a moderate risk. This outcome is based on the Licensee's management systems on site, distance to nearby surface water bodies or groundwater, distance to nearby residential or commercial premises and the potential for the site to impact on the surrounding environment.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
07/07/2014	Application advertised in West Australian (or other relevant newspaper)	No comments received	N/A
25/07/2014	Proponent sent a copy of draft instrument	N Comments received	N/A



6. Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High