

Decision Report

Application for Works Approval

Part V Division 3 of the Environmental Protection Act 1986

Works Approval Number W6609/2021/1 Applicant Coogee Chlor Alkali Pty Ltd ACN ACN 008 747 500 File number DER2021/000563 **Premises** Coogee Chlor Alkali Kemerton Plant Marriott Road **KEMERTON, WA 6233** Legal description Being part of Lot 1 on Diagram 73196 and part of Lot 254 on Plan 416516 As defined by the premises maps attached to the issued works approval Date of report 11 February 2022 Decision Works approval granted

Clarrie Green 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 construction and operation of the premises. As a result of this assessment, works approval W6609/2021/1 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 24 September 2021, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to chemical manufacturing at the premises. The premises is approximately 15 km north-east pf Bunbury within the Kemerton Industrial Park.

The premises relates to the category 31 and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W6609/2021/1. 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 W6609.

Clearing permit CPS9439/1 of 2.097 ha was granted via a separate application on 23 December 2021 and commenced on 16 January 2022.

As part of the works, some groundwater monitoring and abstraction bores are to be decommissioned. The applicant has made a separate application to the department to manage this as well as changes to the groundwater abstraction licence.

2.2.1 Chlorine production and transfer

The proposed works will expand the Coogee Chlor Alkali Kemerton Plant (L6036/1988/13) to increase chlorine production capacity of the facility from 55 tonnes per day (tpd) Cl₂ to 115tpd Cl₂. During current operations liquid chlorine is stored prior to vaporisation and transfer to the Tronox pigment plant, adjacent to the Premises, for the manufacture of titanium dioxide. In the proposed expansion, chlorine liquefication will not occur and gaseous product will be transferred directly to Tronox, on demand as required.

Chlorine is produced via the electrolysis of purified sodium chloride brine solution in ion exchange membrane electrolysis cells. Other products produced by this process include sodium hydroxide and sodium hypochlorite (see Figure 1) as well as hydrogen and hydrochloric acid.

There will be no storage of chlorine involved in the new processing plant as after the product is cooled, dried, and compressed it will flow directly to Tronox via a high-pressure chlorine gas export pipeline.

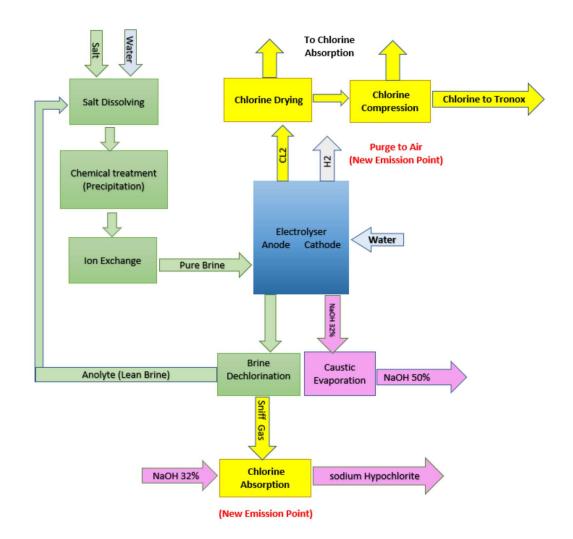


Figure 1: Process flow diagram

Commissioning

Commissioning will occur to verify that the emissions profile is within proposed estimates due to the introduction of two new emission point sources, the hydrogen stack, and the hypochlorite system. Isokinetic stack testing will be undertaken in order to validate process flows and waste concentrations of Cl_2 and H_2 . Testing of the audible alarms system and emergency shutdown controls will also be undertaken. Commissioning is proposed to occur for a duration of 2.5 months.

2.2.2 Waste storage

An effluent sump will temporarily store brine sludge and process wastewater from the sulphate removal system, for pH adjustment prior to transfer to Tronox's effluent ponds.

2.3 Part IV of the EP Act

Ministerial Statement 1144 (preceded by 066) outlines the requirement for no more than 100 tonnes of chlorine to be stored at the Kemerton facility at any time. The proposed expansion will not impact on this; therefore, the proposal has not been referred to the EPA for assessment.

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 operation 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.

Emission	Sources	Potential pathways	Proposed controls					
Construction								
Dust	Vehicle movements Earthworks during excavation	Air / windborne pathway	Excavation works of short duration will be completed and concreted shortly after. No material stockpile. Wet down unsealed areas where necessary to prevent generation of fugitive emissions. Dust mitigation on fence line					
Hydrocarbon spills and leaks	Vehicle and equipment movements Earthworks during excavation	Seepage to soil and groundwater	Vehicle Inspections Pre-start Checklists Construction HSE Management Plan Spill kits Spill Management Training					
Noise	Machinery and vehicle operations	Air / windborne pathway	Majority of fabrication works to be completed offsite. Selection and maintenance of construction plant and equipment to minimise noise levels. Scheduling of construction works to avoid noise emissions at sensitive times.					
Sediment, packing and sealing material	Decommissioning of Groundwater Recovery and Monitoring Bores	Seepage to soil and groundwater	Decommissioning in accordance with "Minimum construction requirements for Water Bores in Australia" Hydrologist Supervision					

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Leachate	Storage of process water and brine sludge in effluent	Seepage to soil and groundwater	Wastewater and brine sludge is collected in acidic effluent sump T-9101 and adjust pH for transfer to Tronox's effluent ponds.
	sump T-9101		Purpose built, tertiary containment sump fitted with a level control system.
			Transfers are a batch process.
Effluent air	Hypochlorite system	Air /	Cl ₂ absorption tower.
(Cl ₂ , N and O ₂) Maximum 5 ppm Cl ₂ emitted, for	via FANS K- 6101 A/B	windborne pathway	2 x Cl₂ in process detectors with interlocks to shutdown plant. Interlocks triggered at Cl₂ ≥ 50ppm. Subject maintenance and inspection program. Safety critical control under Safety Report.
60 mins average			New vent stack to atmosphere, estimated height = 15 metres.
			In process caustic flow transmitter in hypo- reactor and hypo-scrubber to monitor caustic flow rate is within approved range. Interlock for plant shutdown.
			QC monitoring program to validate [OH-] on 12 hour shift basis at hypo-reactor and hypo- scrubber locations.
			Regular inspection and maintenance regime.
H ₂ gas	H ₂ stack	Air / windborne	Continuous temperature control monitoring and alarms.
		pathway	Inject N ₂ for dilution.
			New vent stack to atmosphere, estimated height = 14 metres.
			Critical control set points managed by DCS system.
			Regular inspection and maintenance regime.
Noise	Process operations	Air / windborne	Equipment within building / selection of low noise generating equipment
		pathway	Boundary noise assessment during commissioning to confirm noise levels do not exceed current requirements.

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 2 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
Closest residential receptors	1.7 km east-south-east of the Premises boundary2.3 km south-east of the Premises boundary
Neighboring industries	Adjacent. Stack located ~100m from nearest industrial receptor
Environmental receptors	Distance from prescribed activity
Bunbury Groundwater Area	within the Premises boundary
Ecological Communities (Threatened Ecological Communities and Priority Ecological Communities)	within and immediately to the north-east, east and south of the Premises boundary
Banksia Dominated Woodlands of the Swan Coastal Plain IBRA Region	
Threatened / Priority Flora Pultenaea skinneri (Skinner's pea) Drakaea micrantha (dwarf hammer orchid)	Located beyond the Premises boundary within 1 – 2km
Threatened / Priority Fauna Phascogale tapoatafa wambenger (South- western brush-tailed phascogale) Isoodon fusciventer (Quenda/southwestern brown bandicoot)	Located within 2km of the Premises boundary
Calyptorhynchus banksii naso (Forest red-tailed black cockatoo)	
Acid Sulfate Soils Risk Map, Swan Coastal Plain - Moderate to low risk	Premises mapped within area
Contaminated Sites - Reported Sites (Contaminated - remediation required)	Premises mapped within area - Site ID 12634

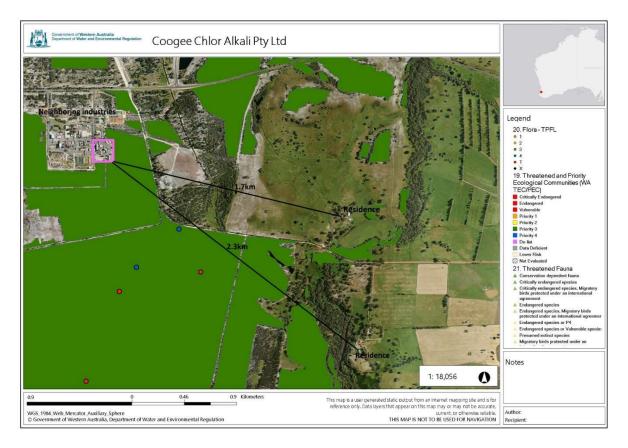


Figure 2: Distance to sensitive receptors

3.2 Air emissions screening

The applicant provided emission rates for chlorine as per the Draft Air Emissions Guideline (DWER 2019) for the Hypochlorite stack emission point as well as for combined emissions at the site.

These emissions were screened as per the Draft Guideline: Air Emissions against the relevant ambient air quality guideline value (AGV) and the results for 1-hour max were both insignificant, less than 10% of the AGV. Combined emissions were calculated using the lowest stack height.

3.3 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 W6609/2021/1 that accompanies this decision report authorises construction, environmental commissioning, 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. 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 amendment application.

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

Risk events			Risk rating ¹			Justification for		
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	additional regulatory controls
Construction								
Excavation	Dust	Air / windborne pathway causing impacts to health and amenity	Residences 1.7 km ESE and 2.3 km SE Threatened flora (within 2km of the Premises boundary) Threatened fauna (within 1- 2km of the Premises boundary) TEC (within and immediately to the north-east, east and south of the Premises boundary)	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	No conditions for the management of dust during construction.	General provisions of the Environmental Protection Act 1986 Environmental Protection (Unauthorised Discharges) Regulations 2004
	Hydrocarbon spills	Discharge to land and infiltration to groundwater	Groundwater (Bunbury Groundwater Area)	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Y	No conditions for the management of hydrocarbon spills.	General provisions of the Environmental Protection Act 1986 Environmental Protection (Unauthorised Discharges)

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Risk events			Risk rating ¹	Annelisant		Justification for		
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	additional regulatory controls
								Regulations 2004
Equipment including vehicle movements (reversing beepers).	Noise	Air / windborne pathway causing impacts to health and amenity	Residences 1.7 km ESE and 2.3 km SE Industrial neighbours	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	No conditions for the management of noise during construction	General provisions of the Environmental Protection Act 1986 Environmental Protection (Noise) Regulations 1997
Commissioning	I	I	1	I				
Commissioning of chlor alkali plant emission points:	Effluent air (Cl ₂ , N and O ₂) leaving the chlorine scrubber C- 6102	(Cl2, N and O2) leaving the chlorine scrubber C- 6102Air / windborne pathway causing impacts to health and amenityH2 gas vented to atmosphere from the electrolysis area hydrogenAir / windborne pathway causing impacts to health and amenity	Residences 1.7 km ESE and 2.3 km SE Industrial neighbours	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Consistent with commitments made by the applicant.	
Hypochlorite production unit vent stack Electrolysis area hydrogen gas vent	H ₂ gas vented to atmosphere from the electrolysis area hydrogen gas vent			Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Consistent with commitments made by the applicant.	N/A
Operation (including time-limited-	Operation (including time-limited-operations operations)							
Emissions from the hypochlorite production	Effluent air (Cl ₂ , N and	Air / windborne pathway causing	Residences 1.7 km ESE and	Refer to Section 3.1	C = Slight	N	Consistent with commitments made	Risk rating determined by

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Risk events			Risk rating ¹			Justification for		
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	additional regulatory controls
unit vent stack	O ₂) leaving the chlorine scrubber C- 6102	impacts to health and amenity	2.3 km SE Industrial neighbours		L = Unlikely Low Risk		by the applicant with the addition of emissions monitoring and limits to ensure low risk is maintained Applicant also required to operate interlocks to cease operation in the event that air emissions exceed the commissioning limit.	low emission rate, the requirement of continued monitoring of Cl ₂ will be imposed on the works approval as well as an emission limit for Cl ₂ . Interlocks required to ensure stack emissions do not exceed acceptable emission rates.
Emissions from the electrolysis area hydrogen gas vent	H ₂ gas vented to atmosphere from the electrolysis area hydrogen gas vent	Air / windborne pathway causing impacts to health and amenity	Residences 1.7 km ESE and 2.3 km SE Industrial neighbours	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Consistent with commitments made by the applicant.	N/A
Emissions from effluent sump T-9101	Effluent spills (process water and brine sludge)	Discharge/seepage to land and infiltration to groundwater	Groundwater (Bunbury Groundwater Area	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Consistent with commitments made by the applicant with the addition of controls aimed at the prevention of overtopping and failure of containment as well as indicators of fault conditions.	As the proposed controls are critical for maintaining an acceptable level of risk, they will be imposed on the works approval.

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IR-T13 Decision report template (short) v3.0 (May 2021)

Risk events			Risk rating ¹			Justification for		
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	additional regulatory controls
Plant processing area	Hydrogen and chlorine / hydrogen and air explosion	Explosion impacting nearby vegetation, industrial receptors and potential wildfires	Residences 1.7 km ESE and 2.3 km SE Industrial neighbours Threatened flora (within 2km of the Premises boundary) Threatened fauna (within 1- 2km of the Premises boundary) TEC (within and immediately to the north-east, east and south of the Premises boundary)	Critical control set points managed by DCS system- auto shut-down systems Continuous monitoring of cell voltage and temperature Nitrogen purge Chlorine absorption system and hydrogen vent stack Trained personnel and firefighting equipment Emergency response plan Regular inspection and maintenance regime	C = Major L = Rare Medium Risk	Y	Consistent with commitments made by the applicant.	N/A
Chlorine export systems	Loss of containment of chlorine	Air / windborne pathway causing impacts to health and amenity	Industrial neighbours Threatened fauna (within 1- 2km of the Premises boundary)	Critical control set points managed by DCS system- auto shut-down systems Automatic	C = Moderate L = Unlikely Medium Risk	Y	Consistent with commitments made by the applicant.	N/A

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IR-T13 Decision report template (short) v3.0 (May 2021)

Risk events			Risk rating ¹			Justification for			
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of works approval	additional regulatory controls	
				isolation of export system					
				Chlorine absorption system					
				Trained personnel and firefighting equipment					
				Emergency response plan					
				Regular inspection and maintenance regime					

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 20 August 2021	None received	N/A
Local Government Authority advised of proposal on 4 November 2021	None received	N/A
Department of Mines, Industry Regulation and Safety (DMIRS) advised of proposal 4 November 2021	DMIRS replied on 5 November 2021 advising that the applicant has been in contact with DMIRS regarding an update of the current safety report. No issues have been identified by DMIRS at this stage.	N/A
DevelopmentWA advised of proposal on 4 November 2021	None received	N/A
Applicant was provided with draft documents on 28 January 2022	Refer to Appendix 1	Refer to Appendix 1

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) 2019, *Guideline: Air Emissions*, Perth, Western Australia.
- 3. DWER 2020, Guideline: Environmental Siting, Perth, Western Australia.
- 4. DWER 2020, Guideline: Risk Assessments, 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	The Applicant provided further information relating to infrastructure listed in Table 1.	Noted and amended.
Condition 8 Table 4 and condition Table 5	The Applicant requested that N be replaced with N ₂ .	Noted and amended.
Condition 8 Table 4	The Applicant requested the removal of requirements for the continuous monitoring of O_2 and N_2 advising that they believe the efficiency of the Hypochlorite production unit can be assessed through Cl ₂ monitoring and the continuous monitoring of N_2 and O_2 is financially inviable.	The Delegated Officer has removed the requirement for N_2 and O_2 noting that further information regarding Cl_2 monitoring and monitoring frequencies provided by the Applicant.
Condition 8 Table 4 and condition 18 Table 6	The Applicant requested to replace AS 4323.1 – 1995 with AS 4323.1 – 2021.	Amendments made to the specified tables. The Delegated Officer notes that AS 4323.1 – 1995 is not applicable and is amended with USEPA Method 26 or USEPA SW-846 Test Method 0050 in Table 4 for Cl ₂ monitoring and USEPA Method 3A.
		The Delegated Officer has removed the requirement for a specified method of monitoring for Cl ₂ in Table 6 due to further information provided regarding the type of monitors operated. Conditions of the works approval require monitoring equipment to meet the manufacturer's design specifications.
Condition 18 Table 6	The Applicant requested the removal of requirements for the continuous monitoring of H_2 .	Noted and amended. The Delegated Officer considers that the requirement to monitor H_2 is not required to determine emissions of concern, and removal is reasonable.
Definitions – Engineer	The Applicant requested the option of certification through either means a person holding current certification Institution of Engineers Australia or (IEAust) or Institute of Chemical Engineers (IChemE).	Noted and amended.
Schedule 1 Figure 2	The Applicant requested to replace Figure 2 with revised map and provided an additional map with export pipeline displayed.	Noted and amended.

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Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY					
Application type					
Works approval	\boxtimes				
		Relevant works approval number:		Non e	
		Has the works approval been complied with?		Yes 🗆 No 🗆	
Licence		Has time limited operations under the works approval demonstrated acceptable operations?] No 🗆 N/A	
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?] No 🗆	
		Date Report received:			
Renewal		Current licence number:			
Amendment to works approval		Current works approval number:			
		Current licence number:			
Amendment to licence		Relevant works approval number:		N/A	
Registration		Current works approval number:		Non e	
Date application received		24 September 2021			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Coogee Chlor Alkali Pty Limited			
Premises name		Coogee Chlor Alkali Kemerton Plant			
Premises location		Part of Lot 1 on Diagram 73196 and part of Lot 254 on Plan 416516			
Local Government Authority		Shire of Harvey			
Application documents					
HPCM file reference number:		DER2018/001042-6~36			
Key application documents (additional to application form):		Attachment 1A: Proof of occupier status Attachment 1B: ASIC company extract Attachment 1C: Authorisation to act as representative of the occupier Attachment 2A - C: Premises maps			

		Attachment 3A: Environmental Commissioning Plan Attachment 3B: Proposed activities Attachment 5: Stakeholder consultation Attachment 6A: Emissions and Discharges Attachment 7: Siting and Location Attachment 9: Proposed fee calculation Attachment 11: Project Brief			
Scope of application/assessment					
Summary of proposed activities or changes to existing operations.		Works approval Increase the capacity of the Kemerton Coogee Chlor-alkali facility through an expansion of the existing 55tpd chlorine plant.			
		The new plant will bring total premises capacity by 60tpd to 115tpd.			
Category number/s (activities that			me prescribed premises)		
Table 1: Prescribed premises cat	egoi	ries			
Prescribed premises category and description		posed production or sign capacity	Proposed changes to the production or design capacity (amendments only)		
31 - Chemical manufacturing: 90, Premises on which chemical products are manufactured by a chemical process. 100 Tonnes or more per year.		000 tonnes per year			
Legislative context and other app	orova	als			
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: 066 EPA Report No:		
Has the proposal been referred and/or assessed under the EPBC Act?		Yes □ No ⊠	Reference No:		
Has the applicant demonstrated occupancy (proof of occupier status)?		Yes ⊠ No □	Certificate of title ⊠ General lease □ Expiry: Mining lease / tenement □ Expiry: Other evidence □ Expiry:		

Has the applicant obtained all relevant planning approvals?	Yes □ No ⊠ N/A □	Approval: Expiry date: If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes 🛛 No 🗆	CPS No: 9439/1
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes 🗆 No 🛛	Application reference No: N/A Licence/permit No: N/A
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes ⊠ No □	Application reference No: Licence/permit No: GWL100789(6)
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes □ No ⊠	Name:BunburyGroundwaterAreaType:Proclaimed GroundwaterAreaHas Regulatory Services (Water)been consulted?YesNoN/ARegional office:
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes □ No ⊠	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes □ No □ N/A ⊠
Is the Premises subject to any other Acts or subsidiary regulations (e.g. Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx)	Yes ⊠ No □	Dangerous Goods Safety Act 2004 Dangerous Goods Safety (Major Hazard Facilities) Regulations 2007 • Dangerous Goods License DGS012178
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 ⊠ No □	Classification: contaminated – remediation required (C–RR) TRIM DEC12258 & 2013/2101 CSS Site ID 1324 Date of classification: 19/07/2011