Government of Western Australia
Department of Water and Environmental Regulation

Licence

Licence number	L2963/2025/1
Licence holder	Dodd & Dodd Group Pty Ltd
ACN	009 238 671
Registered business address	Central Park Level 43 152-158 St Georges Terrace PERTH WA 6000
Application number	APP-0029271
Duration	01/07/2025 to 30/06/2045
Date of issue	26/06/2025
Premises details	C.D. Dodd – Onslow Lot 550 Onslow Road TALANDJI WA 6710 Legal description - Part of Lot 550 on Deposited Plan 414367 Reserve 53324 Certificate of Title Volume LR3169 Folio 963 As defined by the Premises Map in Schedule 1

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	**Assessed design capacity**
Category 47: Scrap Metal Recovery	No more than 20,000 tonnes per annual period
Category 61A: Solid Waste facility	

This licence is granted to the licence holder, subject to the attached conditions, on 26 June 2025, by:

Adam Harbeck
Digitally signed by Adam Harbeck
Date: 2025.06.26 12:28:05 +08'00'

MANAGER, WASTE INDUSTRIES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Licence history

Date	Reference number	Summary of changes
26/06/2025	L2963/2025/1	APP-0029271. Licence granted.

Interpretation

In this licence:

(a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;

(b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;

(c) where tables are used in a condition, each row in a table constitutes a separate condition;

(d) any reference to an Australian or other standard, guideline, or code of practice in this licence:

  (i) if dated, refers to that particular version; and

  (ii) if not dated, refers to the latest version and therefore may be subject to change over time;

(e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and

(f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

Licence conditions

The licence holder must ensure that the following conditions are complied with:

Infrastructure and equipment

1. The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

Table 1: Infrastructure and equipment requirements

	Site infrastructure and equipment	Operational requirement	Infrastructure location
1.	Ground liner (UV resistant, reinforced PVC or LLDPE)	a) Integrity of the liner must be maintained	As depicted in Schedule 1, Figure 3
2.	Portable and collapsible bunds	a) Integrity of the bunds must be maintained. b) Bunds must be sized around containment infrastructure so as to be able to contain more than 125% of the volume of the largest container stored within the bunded area. c) Liquid contaminated with spills or leaks of environmentally hazardous material contained within bunds must not be discharged to the environment.	As depicted in Schedule 1, Figure 3
3.	Pipe cutting station	a) Must be located within a bunded area on top of the ground liner.	As depicted in Schedule 1, Figure 2
4.	Flexible end pipe opening station	a) Hydraulic press and bandsaw must be located within a bunded area.	As depicted in Schedule 1, Figure 2
5.	Chemical cleaning (HEFU) stations for tubulars	a) Must be located in a bunded area on top of the ground liner. b) Chemicals required for use in decontamination activities must be stored within a bunded area. c) All wastewater generated from decontamination activities must be stored within a bunded area. d) Wastewater must only be reused where it has been successfully filtered to less than 1 micron.	As depicted in Schedule 1, Figure 2

	Site infrastructure and equipment	Operational requirement	Infrastructure location
6.	AHDF station	a) Must be located in a bunded area on top of the ground liner. b) Must be installed with cover and curtains capable of preventing spray drift. c) All wastewater generated from decontamination activities must be contained within a bunded area. d) Chemicals required for use in decontamination activities must be stored within a bunded area. e) Wastewater must only be reused where it has been successfully filtered to less than 1 micron.	As depicted in Schedule 1, Figure 2
7.	Washdown area	a) All wastewater generated from washdown activities must be contained within the washdown area.	As depicted in Schedule 1, Figure 2
8.	Wastewater treatment infrastructure (AHDF Station and mobile filtration skids)	a) Must be located in a bunded area on top of the ground liner, b) All pipework and filters must be maintained in good working order.	As depicted in Schedule 1, Figure 2
9.	Waste items storage areas (contaminated)	a) Storage areas must be located on top of the ground liner. b) Contaminated items must be stored in bunded areas. c) Only the ends of long items such as pipes and flowlines are required to be stored over bunded areas. d) Open ends of rigid and flexible pipes and spool pieces must be plugged or covered prior to being moved outside of the bunded area.	As depicted in Schedule 1, Figure 2
10.	Waste items storage areas (decontaminated)	a) Wastes must only be stored in this area when the decontamination clearance levels listed in Table 6 have been achieved for identified contaminants and a clearance certificate has been provided. b) Structures must be cut into segments in situ prior to moving for scrapping.	As depicted in Schedule 1, Figure 2
11.	NORM and mercury waste storage area	a) Must be located in a bunded area on top of the ground liner. b) Integrity of storage vessels and containers within the storage area must be maintained.	As depicted in Schedule 1, Figure 2

	Site infrastructure and equipment	Operational requirement	Infrastructure location
12.	Scrap metal processing area	a) Used for processing uncontaminated or decontaminated scrap metal only. b) Equipment used for cutting and resizing scrap metal is to be maintained in good condition and working order.	As depicted in Schedule 1, Figure 2
13.	Fuel tank and fuelling station	a) Must be self-bunded and capable of containing all leaks and spills. b) Must be maintained in good working order.	As depicted in Schedule 1, Figure 2
14.	Chemical storage containers	a) Must be located in a bunded area on top of the ground liner. b) Integrity of storage vessels and containers must be maintained.	As depicted in Schedule 1, Figure 2
15.	Transition stations	a) Must be established in proximity to work areas where there is a potential risk of site contamination. b) Appropriate cleaning and decontamination solutions and equipment must be available at all times to ensure effective decontamination of footwear prior to personnel exiting potentially contaminated areas.	Permanently located at site facilities (4, 5, and 6), the AHDF (23) and pipe cutting station (22) as depicted in Schedule 1, Figure 2.

Waste acceptance and processing

Waste acceptance

2. The licence holder must only accept onto the premises waste of a waste type, which does not exceed the corresponding rate at which waste is received, and which meets the corresponding acceptance specification set out in Table 2.

Table 2: Types of waste authorised to be accepted onto the premises

	Waste type	Rate at which waste is received	Acceptance specification
1.	Decommissioned infrastructure	20,000 tonnes per annual period	a) On arrival at the premises, wastes must be assessed for contamination in accordance with Condition 4. b) Once assessed for contamination, wastes must be stored in a bunded area prior to processing.

	Waste type	Rate at which waste is received	Acceptance specification
2.	Scrap metal (ferrous and non-ferrous)		a) Scrap metal, including but not limited to: i. Machinery ii. Drill rods iii. Light gauge (mixed) scrap iv. Heavy gauge steel v. Non-ferrous metals vi. Depolluted car bodies. b) Non-conforming waste and hazardous waste must not be accepted, including but not limited to: Liquefied Petroleum Gas cylinders, acetylene cylinders (or any other compressed gas cylinders), and chemical, hazardous, flammable, radioactive or explosive substances.

3. Where the licence holder identifies that waste does not meet the waste acceptance criteria set out in condition 2, the licence holder must:

(a) record the details of the:

(i) waste (type and description)

(ii) source of the waste load;

(iii) name of the waste carrier;

(iv) registration number of the delivery vehicle; and

(v) date the waste load was rejected;

and

(b) reject the waste and have it removed from the premises by the waste supplier's delivery vehicle;

or

where the waste supplier cannot remove the waste in the delivery vehicle, it is stored in a clearly marked and sealed container and removed to an appropriately authorised facility within seven (7) calendar days of receipt.

4. The licence holder must inspect and survey each item of decommissioned infrastructure accepted at the premises in accordance with Table 3.

5. In the event that a criterion in Table 3 exceeds the corresponding trigger level specified for that criterion, the licence holder must consider that item of decommissioned infrastructure as contaminated.

Table 3: Contamination inspection/survey criteria and trigger levels

	Criteria	Equipment	Trigger levels
1.	NORM surface contamination	Contamination Meter	≥0.2 Bq/cm^2

	Criteria	Equipment	Trigger levels
2.	NORM surface gamma dose rate	Gamma survey meter	Above twice reference background (µSv/h)
3.	Workplace exposure standards for elemental mercury (vapour) 8-hour exposure	Mercury vapour monitor	>12.5 µg/m^3
4.	Surface mercury contamination	Portable XRF monitor	≥ MDL (≥ 90 ppm) ≥2µg/cm^2
5.	Workplace exposure standards for hydrogen sulphide (H_2S) 8-hour exposure	H_2S Gas Monitor	≥5 ppm
6.	Workplace exposure standards for VOC and BTEX (benzene)	Photoionisation detector	≥0.5 ppm VOC ≥0.5 ppm benzene

6. The licence holder must undertake container floor surveys after the unloading of contaminated decommissioned infrastructure in accordance with Table 4.

7. In the event that a criterion in Table 4 exceeds the corresponding trigger level specified for that criterion, the licence holder must undertake the corresponding management action listed for that criterion, until the clearance criteria is met for that criterion.

Table 4: Container floor contamination survey

	Criteria	Equipment	Trigger levels	Management action	Clearance criteria
1.	NORM surface contamination	Contamination meter	≥0.2 Bq/cm^2	a) Floor must be vacuumed with a HEPA filter vacuum. b) If contamination remains after this action, floor must also be washed down and wastewater from this process captured for treatment through the wastewater treatment infrastructure.	<0.2 Bq/cm^2 above background
2.	Mercury vapour (elemental)	Mercury vapour monitor	≥0.012 mg/m^2	a) Floor must be vacuumed with a HEPA filter vacuum. b) If contamination remains after this action, affected surface must be sprayed with MeDex and resulting mercury salt removed using the HEPA filter vacuum when dry.	<0.012 mg/m^3

	Criteria	Equipment	Trigger levels	Management action	Clearance criteria
3.	Mercury in scale and surface bound mercury	Portable XRF surface measurement	≥90 ppm	a) Floor must be vacuumed with a HEPA filter vacuum. b) If contamination remains after this action, affected surface must be sprayed with MeDex and resulting mercury salt removed using the HEPA filter vacuum when dry.	< MDL (<90 ppm) <2 µg/cm^2

Waste processing

8. The licence holder must ensure that the waste types specified in Table 5 are only subjected to the corresponding process(es), subject to the corresponding process limits and/or specifications.

Table 5: Waste processing

	Waste type	Process(es)	Process limits and/or specifications
1.	Decommissioned infrastructure (Contaminated)	Pipe cutting	a) Pipe cutting must occur within the pipe cutting station. b) Cut pipe ends must be stored in an enclosed container in a manner that does not cause discharge to the environment.
2.	Decommissioned infrastructure (Contaminated)	Pipe end opening	a) Pipe end opening must be conducted within the flexible end pipe opening station. b) Opened pipe ends must be plugged or covered before moving to a storage area.
3.	Decommissioned infrastructure (Contaminated)	Decontamination activities	a) Wastes contaminated with NORMs, mercury, H_2S and/or BTEX must be decontaminated within the HEFU stations or the AHDF station, apart from structures which are too large and heavy to move, such as wellheads, Christmas trees and manifolds. b) Structures which are too large and heavy to move may be decontaminated in-situ within the premises yard, using temporary bunds, IBCs, pumps, cleaning connectors and lances, in a manner that prevents contaminated material from being discharged into the environment. c) All contaminated items and IBCs for water, chemicals, and wastewater from the cleaning of large structures in-situ, must be stored within bunded areas. d) Wastes contaminated with marine growth only may be decontaminated in the concrete washdown area.

	Waste type	Process(es)	Process limits and/or specifications
4.	Decommissioned infrastructure and scrap metal (Not contaminated/decontaminated)	Scrap metal processing and storage prior to removal from site	a) Scrap metal processing must only occur within the designated scrap metal processing area. b) The total amount of scrap stored on the premises must not exceed 5,000 tonnes at any one time. c) Stockpiles of scrap metal must not exceed 5 m in height or 20 m in width.
5.	Waste NORM and mercury solids removed from decommissioned infrastructure (Contaminated)	Storage prior to removal from the site	a) Must be stored in lined, sealed UN-rated drums in a lockable steel container, and located within a bunded area pending removal off-site to an appropriately licensed facility.
6.	Wastewater generated from decontamination activities	Wastewater treatment and storage/use of treated wastewater	a) Wastewater generated from the decontamination process must be collected in enclosed leak-proof containers for on-site treatment or disposal off-site to a suitably licensed facility. b) Must only be treated within wastewater treatment infrastructure. c) Solid particulates must be removed using settling drum and filters. d) Wastewater must only be reused where it has been filtered to less than 1 micron. e) Treated wastewater must only be reused for decontamination processes. f) Where wastewater cannot be filtered to less than 1 micron, it must be removed off-site for disposal to a licensed facility. g) The licence holder must store treated wastewater in impermeable, leak free Intermediate Bulk Containers (IBCs) or equivalent containment vessels within a bunded area of the premises prior to disposal off site. h) Must be tested for disposal in accordance with Condition 11.

9. The licence holder must inspect and survey each item of contaminated decommissioned infrastructure after it has undergone decontamination activities in accordance with Table 6.

10. The licence holder must only consider an item of contaminated decommissioned infrastructure decontaminated in the event that a criterion in Table 6 is below the corresponding clearance level specified for that criterion.

Table 6: Decontamination acceptance criteria and testing methods

	Criteria	Equipment	Clearance levels
1.	NORM Surface Contamination	Contamination Meter	<0.2 Bq/cm^2 above BG

	Criteria	Equipment	Clearance levels
2.	NORM Surface Gamma Dose Rate	Gamma Survey Meter	<2 x BG (µSv/h)
3.	Mercury Vapour (Elemental)	Mercury Vapour Monitor	<0.012 mg/m^3
4.	Elemental Mercury (Liquid)	Visual	None
5.	Mercury in Scale and Surface Bound Mercury	pXRF Surface Measurement	<MDL (<90 ppm) <2 µg/cm^2
6.	Hydrogen Sulphide (H_2S)	H_2S Gas Monitor – Microclip X3 4- Gas Detector	<5 ppm
7.	Benzene (BTEX)	PID Gas Monitor – UltraRAE 3000+	<0.5 ppm

11. The licence holder must not remove treated wastewater from the premises to an appropriate licensed facility for disposal unless the disposal contaminant criteria outlined in Table 7 have been demonstrated for that container of wastewater.

Table 7: Wastewater disposal contaminant criteria

	Contaminant	Disposal criteria	Method
1.	Oil in water	<30 ppm	ASTM D95
2.	Mercury	<0.1 µg/L	USEPA Method 7473
3.	NORM- Gross alpha/beta	<0.5 Bq/L	USEPA Method 900.0/302
4.	NORM-Ra226 or RA228	<1.1 Bq/L	USEPA Method 900.0/302

Emissions and discharges

12. The licence holder must immediately recover, or remove and dispose of, spills of environmentally hazardous materials including potentially contaminated wastewater, fuel, oil, or other hydrocarbons, whether inside or outside an engineered containment system.

13. The licence holder must ensure that all material used for the recovery, removal, and/or disposal of environmentally hazardous materials is stored in an impermeable container prior to disposal at an appropriately authorised facility.

14. The licence holder must take all reasonable and practicable measures to prevent stormwater run-off becoming contaminated by the activities and operations undertaken at the premises.

Fire and emergency management

15. The licence holder must implement a Fire and Emergency Management Plan prepared by a suitably qualified fire management consultant by 30 September 2025.

16. The Fire and Emergency Management Plan required by condition 15 must be submitted to the CEO by 30 September 2025.

17. The Fire and Emergency Management Plan required by condition 15, must include, but is not limited to:

(a) an assessment of the fire safety risk, including identification of areas where a fire might occur and factors that might cause a fire;

(b) how fires will be prevented, detected, responded to, supressed, contained and controlled;

(c) the firefighting equipment and fire response capabilities and responsibilities; and

(d) a plan showing the location and layout of firefighting equipment and systems at the premises.

18. The licence holder must notify the CEO of the following as soon as practicable, but no later than 7 days after the event of:

(a) any fire on the premises; and/or

(b) any accident, malfunction, or emergency which results or could result in the discharge of firefighting wash-water or other wastes from the premises.

19. The licence holder must ensure that:

(a) any unauthorised fire on the premises is extinguished as soon as possible;

(b) all accumulated and recoverable fire wash-water and other waste that may result from firefighting on the premises is collected and removed within 24-hours of a fire event; and

(c) any firefighting wash-water is removed without delay by a carrier licensed under the *Environmental Protection (Controlled Waste) Regulations 2004*.

Monitoring

20. The licence holder must record the total amount of waste accepted onto the premises, for each waste type listed in Table 8 in the corresponding unit, and for each corresponding time period, as set out in Table 8.

Table 8: Waste accepted onto the premises

	Waste type	Unit	Time period
1.	Decommissioned infrastructure	Tonnes	Each load arriving at the premises
2.	Scrap metal		

21. The licence holder must record the total amount of waste removed from the premises, for each waste type listed in Table 9, in the corresponding unit, and for each corresponding time period set out in Table 9.

Table 9: Waste removed from the premises

	Waste type	Unit	Time period
1.	Scrap metal	Tonnes	Each load leaving the premises
2.	Contaminated waste		
3.	Wastewater	m^3	

22. Prior to removal from site for disposal, the licence holder must classify the contaminated filters from wastewater infrastructure using the *Landfill Waste Classification and Waste Definitions 1996* to determine the correct class of landfill this waste can be disposed to.

Records and reporting

Records

23. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions from the premises:

(a) the name and contact details of the complainant, (if provided);

(b) the time and date of the complaint;

(c) the complete details of the complaint and any other concerns or other issues raised; and

(d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.

24. The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:

(a) the calculation of fees payable in respect of this licence;

(b) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence;

(c) monitoring programmes undertaken in accordance with conditions 20 and 21 of this licence; and

(d) complaints received under condition 23 of this licence.

25. The books specified under condition 24 must:

(a) be legible;

(b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;

(c) be retained by the licence holder for the duration of the licence; and

(d) be available to be produced to an inspector or the CEO as required.

Reporting

26. The licence holder must:

(a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and

(b) prepare and submit to the CEO an Annual Audit Compliance Report in the approved form by 31 August each year.

27. The licence holder must:

(a) prepare an Environmental Report that provides information in accordance with Table 10 for the preceding two annual periods, and

(b) submit that Environmental Report to the CEO by 31 August and biennially thereafter.

Table 10: Environmental reporting requirements

Condition	Requirement
N/A	A summary of any failure or malfunction of any pollution control equipment or any incidents that occurred during each annual period and any related action taken.
6,7	A summary of the results of container floor surveys undertaken and any management actions taken.
4, 8 (Table 5, Row 6), 11, 20, 21	A summary of input and output monitoring for each annual period that includes the following information: a) The total volume of waste types accepted, including the proportion of decommissioned infrastructure which was classified as contaminated on acceptance to the premises. b) The total volume of waste types rejected. c) The total volume of outputs of each waste type removed from the premises. d) The total volume of waste types remaining at the premises, including the proportion of treated wastewater which was retained on the premises for reuse in cleaning/decontamination activities.
9,10	A summary of decontaminated infrastructure testing results.
11	A summary of treated wastewater sampling results, disposal volumes and disposal facilities this waste has been transported to.
12, 13	Overview of spill cleanup and remediation activities, including but not limited to: • Volumes of materials spilled; • Volumes of material recovered; • Details and results of any soil testing undertaken; and • Disposal details (facilities and transport companies)
18, 19	Summary of all fire events within the premises, including details of cleanup and remediation actions.
23	Complaints summary.

Definitions

In this licence, the terms in Table 11 have the meanings defined.

Table 11: Definitions

Term	Definition
ACN	Australian Company Number
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates are available on the Department's website).
AHDF	means Automatic High Pressure Decontamination Facility
annual period	a 12-month period commencing from 1 July until 30 June of the immediately following year.
ASTM D95	ASTM D95 Standard Test Method for Water in Petroleum Products and Bituminous Materials by Distillation
biennially	means every two years.
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer of the department. "submit to / notify the CEO" (or similar), means either: Director General Department administering the *Environmental Protection Act 1986* Locked Bag 10 Joondalup DC WA 6919 or: info@dwer.wa.gov.au
Christmas tree	means an assembly of valves, pipes, spools and fittings used to control the flow of oil from a well.
department; DWER	means the department established under section 35 of the *Public Sector Management Act 1994* (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.
discharge	has the same meaning given to that term under the EP Act.
emission	has the same meaning given to that term under the EP Act.
EP Act	*Environmental Protection Act 1986* (WA)
EP Regulations	*Environmental Protection Regulations 1987* (WA)
HEFU	means High Energy Flushing Unit

Term	Definition
Decommissioned infrastructure	means containers, equipment, and structures that have been retired from operational use, including but not limited to tanks, pipelines, processing units, wellheads, skids, and associated components from onshore industrial, mining, or hydrocarbon facilities. It includes both onshore and offshore infrastructure that has been dismantled, retrieved, or otherwise removed as part of a formal decommissioning process.
licence	refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.
licence holder	refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.
LLDPE	means Linear Low-Density Polyethylene
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map (Figure 1) in Schedule 1 to this licence.
prescribed premises	has the same meaning given to that term under the EP Act.
PVC	means Polyvinyl chloride
Suitably qualified fire management consultant	means a person who: (a) has a minimum of five years of experience working in a supervisory area of fire control system design, installation and commissioning; and (b) is employed by an independent third party external to the licence holder's business; (c) or is otherwise approved in writing by the CEO to act in this capacity.
USEPA Method 7473	USEPA Method 7473: Mercury in Solids and Solutions by Thermal Decomposition, Amalgamation, and Atomic Absorption Spectrophotometry
USEPA Method 900.0/302	USEPA Method 900.0/302: Gross Alpha and Gross Beta Radioactivity in Drinking Water
waste	has the same meaning given to that term under the EP Act.

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown in the map below (Figure 1).

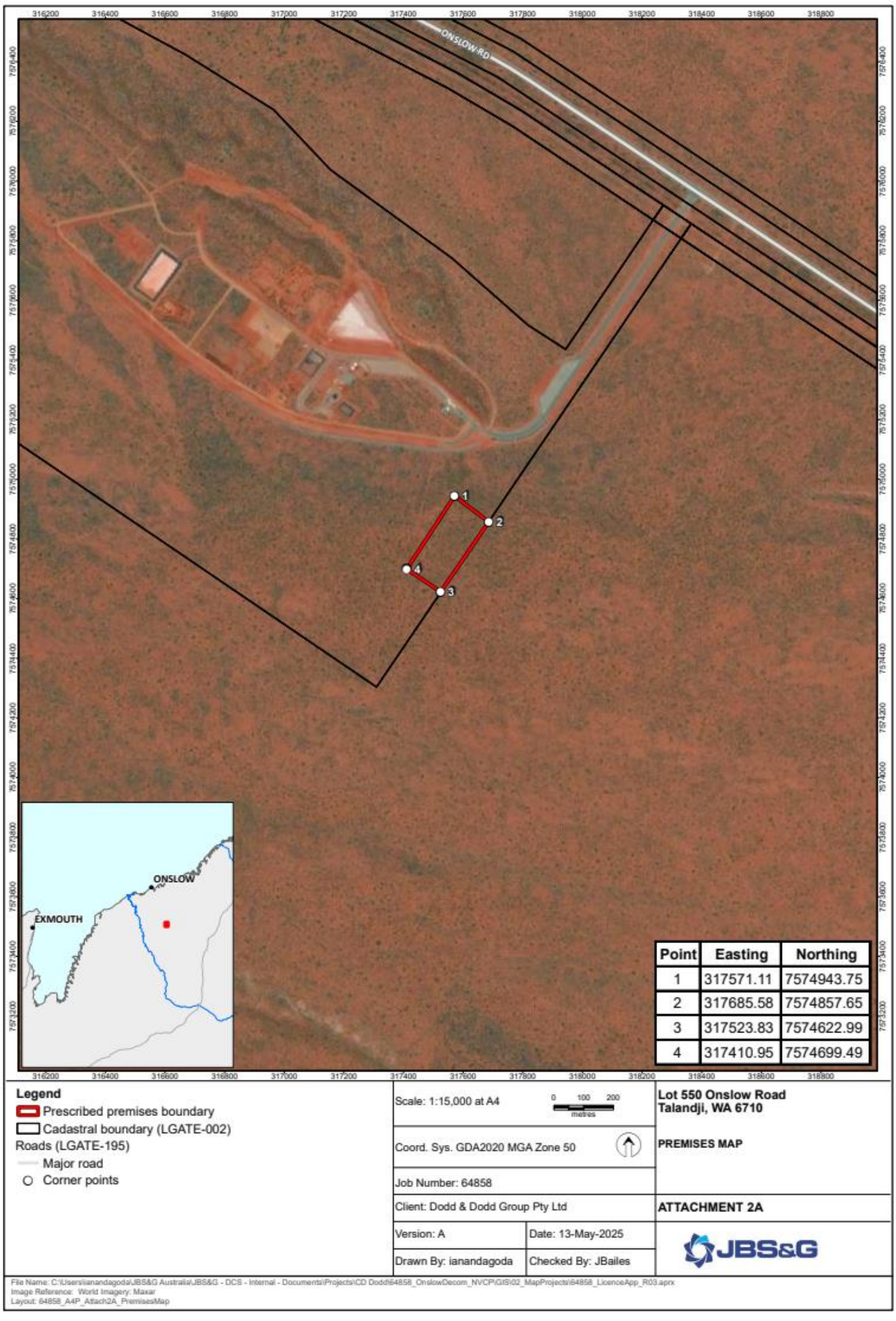
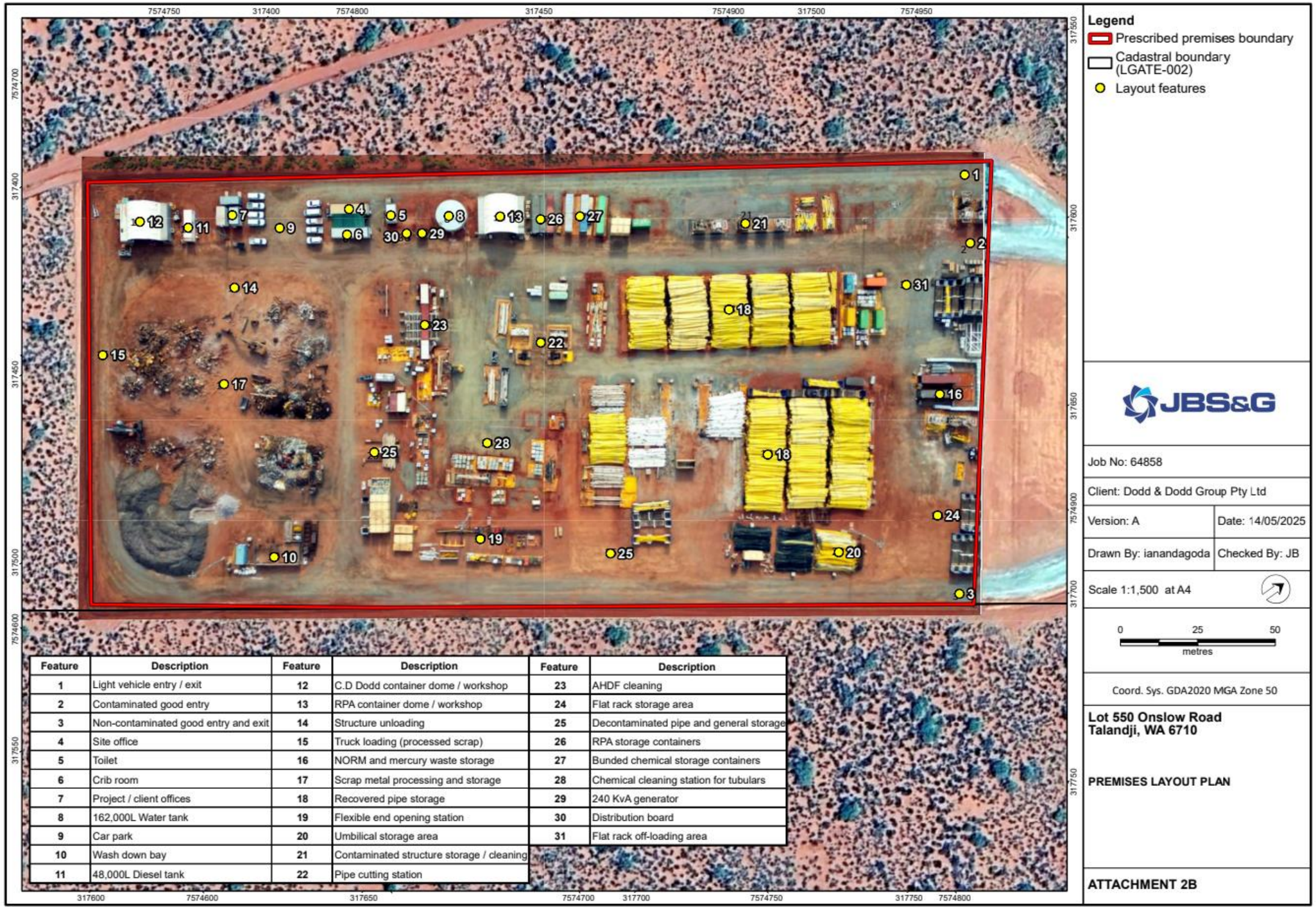


Figure 1: Map of the boundary of the prescribed premises



Feature	Description	Feature	Description	Feature	Description
1	Light vehicle entry / exit	12	C.D Dodd container dome / workshop	23	AHDF cleaning
2	Contaminated good entry	13	RPA container dome / workshop	24	Flat rack storage area
3	Non-contaminated good entry and exit	14	Structure unloading	25	Decontaminated pipe and general storage
4	Site office	15	Truck loading (processed scrap)	26	RPA storage containers
5	Toilet	16	NORM and mercury waste storage	27	Bunded chemical storage containers
6	Crib room	17	Scrap metal processing and storage	28	Chemical cleaning station for tubulars
7	Project / client offices	18	Recovered pipe storage	29	240 KvA generator
8	162,000L Water tank	19	Flexible end opening station	30	Distribution board
9	Car park	20	Umbilical storage area	31	Flat rack off-loading area
10	Wash down bay	21	Contaminated structure storage / cleaning		
11	48,000L Diesel tank	22	Pipe cutting station		

Figure 2: Premises layout plan

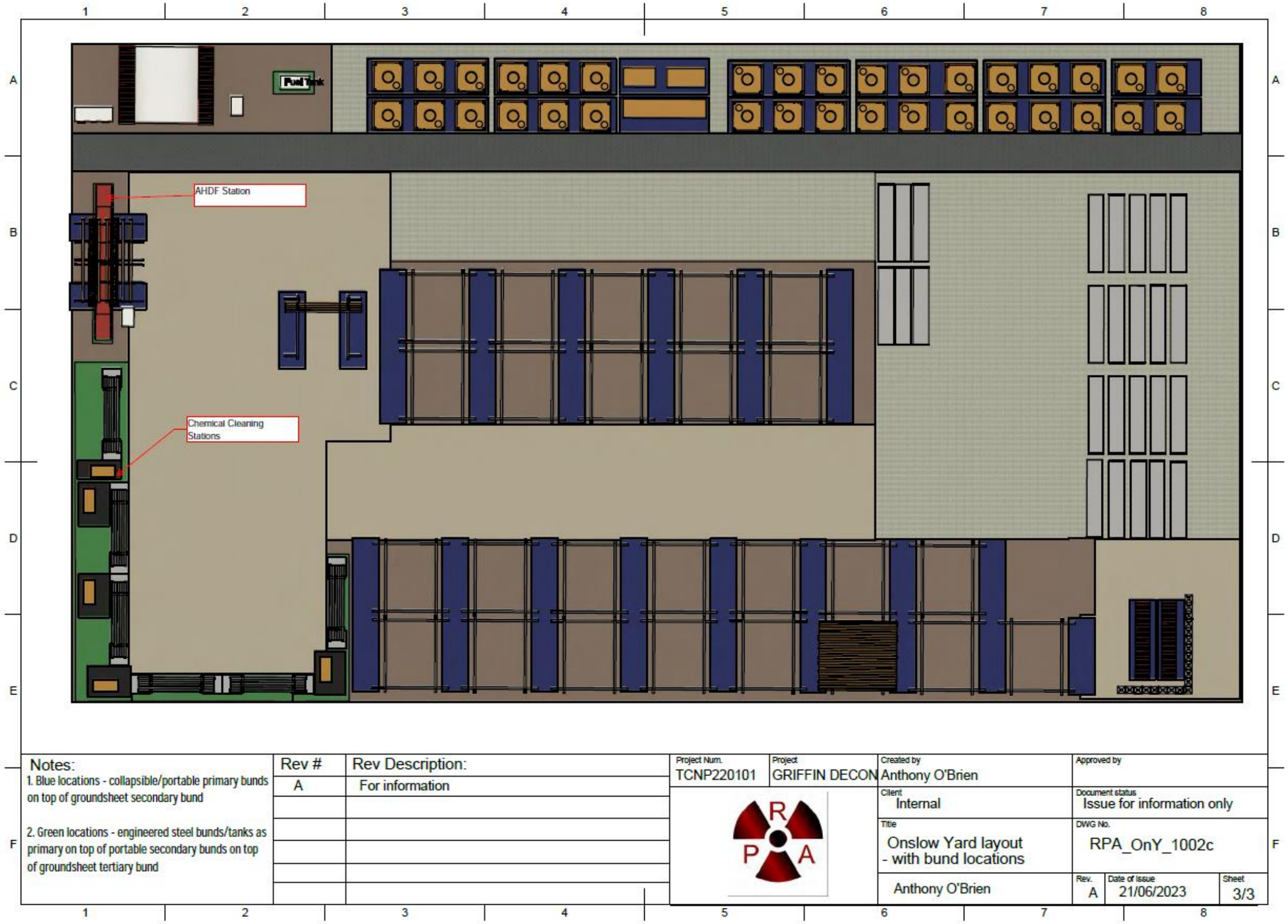


Figure 3: Location of bunds and ground liner (tertiary bund)