

Works Approval

Environmental Protection Act 1986, Part V

Works Approval Holder: ResourceCo Pty Ltd

Works Approval Number: W5852/2015/1

Registered office:	C/O Hood and Sweeney Pty Ltd Level 3 11-16 South Terrace ADELAIDE SA 5000
ACN:	068 976 803
Premises address:	Welshpool Fully Integrated Resource Recovery Facility 78 Adams Drive WELSHPOOL WA 6106 Being Lot 801 on Plan 39925 as depicted in Schedule 1.
Issue date:	Thursday, 1 October 2015
Commencement date:	Monday, 5 October 2015
Expiry date:	Tuesday, 4 October 2016

The following category/s from the *Environmental Protection Regulations 1987* cause this Premises to be a prescribed premises for the purposes of the *Environmental Protection Act 1986*:

Category number	Category description	Category production or design capacity	Approved premises production or design capacity
57	Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	100 tyres or more per year	25,000 tyres stored at any one time with an annual throughput of 16,500 tonnes
61A	Solid waste facility: premises (other than premises within Category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	1,000 tonnes or more per year	220,000 tonnes per annual period

Conditions

This Works Approval is subject to the conditions set out in the attached pages.

Rebecca Kelly Manager Licensing (Waste Industries) Officer delegated under section 20 of the *Environmental Protection Act 1986* Date signed: 01 October 2015

Environmental Protection Act 1986 Works Approval:W5852/2015/1 File No: DER2015/000739



Works Approval Conditions

1 General

1.1 Interpretation

- 1.1.1 In the Works Approval, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.
- 1.1.2 In the Works Approval, unless the contrary intention appears:

'Act' means the Environmental Protection Act 1986;

'annual period' means the inclusive period from 1 April until 31 March in the following year;

'asbestos' means the asbestiform variety of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals and includes actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite and any mixture containing 2 or more of those;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer Department Administering the Environmental Protection Act 1986 Locked Bag 33 CLOISTERS SQUARE WA 6850 Telephone: (08) 9333 7510 Facsimile: (08) 9333 7550 Email: info@der.wa.gov.au;

'DER Asbestos Guidelines' means document titled "Guidelines for managing asbestos at construction and demolition waste recycling facilities", published by the Department of Environment and Conservation, as amended from time to time;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Works Approval;

'Schedule 1' means Schedule 1 of this Works Approval unless otherwise stated;

'Works Approval' means this Works Approval numbered W5852/2015/1 and issued under the *Act;*

'Works Approval Holder' means the person or organisation named as the Works Approval Holder on page 1 of the Works Approval;

- 1.1.3 Any reference to an Australian or other standard in the Works Approval means the relevant parts of the standard in force from time to time during the term of this Works Approval.
- 1.1.4 Any reference to a guideline or code of practice in the Works Approval means the current version of the guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guidelines or code of practice made during the term of this Works Approval.



1.2 General conditions

1.2.1 The Works Approval Holder shall construct the works in accordance with the documentation detailed in Table 1.2.1:

Table 1.2.1: Construction Requirements ¹		
Document	Parts	Date of
		Document
Works Approval Application Form	All	1 May 2015
ResourceCo Development Application & Environmental	All, including	1 May 2015
Management Plan for Welshpool Fully Integrated Dry	Drawings and	
Waste Resource Recovery Facility (RRF) located at Lot	Appendices	
801 Adams Drive (24) Tomlinson Rd, Welshpool WA		
6106		
Gemec Environmental Consultants, Addendum to the	All, including	29 May 2015
Environmental Management Plan, ResourceCo Pty Ltd,	Drawings and	
Welshpool Integrated Resource Recovery Facility	Appendices	
prepared for ResourceCo PO BOX 542 Enfield Plaza		
South Australia 5085, prepared by Gemec Environmental		
Consultants.		
Email from Richard Baldwin, Director Gemec	All, including	5 June 2015
Environmental Consultants, RE: ResourceCo Tomlinson	Drawings and	
Road Welshpool Facility	Appendices	40.1 004.5
Gemec Environmental Consultants, Addendum to the	All, including	10 June 2015
Environmental Management Plan, ResourceCo Pty Ltd,	Drawings and	
Welshpool Integrated Resource Recovery Facility	Appendices	
prepared for ResourceCo PO BOX 542 Enfield Plaza		
South Australia 5085, prepared by Gemec Environmental		
Consultants.	All including	11 June 2015
Email from Mike Haywood, FW: Noise emission DOKON H Series	All, including	
	Drawings and	
Harring Storar Acoustics (PasaurooCo Pty Ltd Walabaad	Appendices	July 2015
Herring Storer Acoustics 'ResourceCo Pty Ltd Welshpool Integrated Resource Recovery Facility, 24 Tomlinson	All, including Drawings and	July 2015
Road, Welshpool, Noise Emissions Assessment'.	Appendices	
Note 1: Where the details and commitments of the documents li		1 and in consistent with

Note 1: Where the details and commitments of the documents listed in condition 1.2.1 are inconsistent with any other condition of this works approval, the conditions of this works approval shall prevail.

2 **Premises Operation**

^{2.1.1} The Works Approval holder shall complete the requirements in Table 2.1.1 by the date of completion in Table 2.1.1.

Table 2.1.1 Pre	mises requirements	
Requirement reference	Requirement	Date of completion
IR1	The Works Approval holder shall prepare and submit to the CEO an Asbestos Management Plan (AMP). As a minimum the AMP shall include;	Within two months of the works approval being
	 Standard operational procedures (SOP's) for the pre- acceptance and acceptance of waste and how any asbestos detected on site will be managed; and Identification of each person's roles and responsibilities under the AMP; and Procedures for detailing incidents or emergencies associated with asbestos 	issued.



that are consistent with the DER Asbestos Guidelines

3 Information

3.1 Reporting

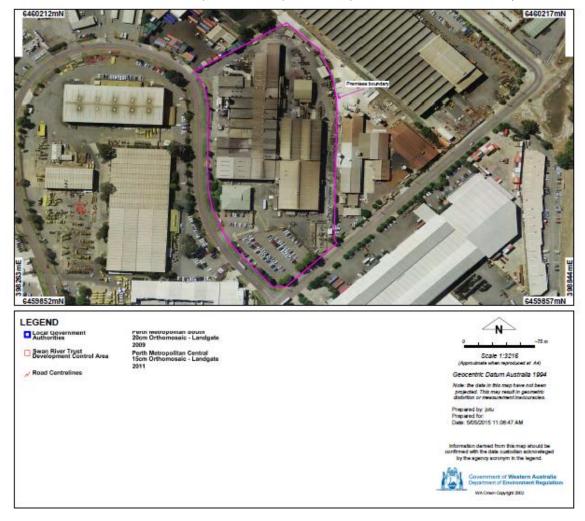
- 3.1.1 The Works Approval Holder shall submit a compliance document to the CEO, following the construction of the works and prior to commencing operations.
- 3.1.2 The compliance document shall:
 - (a) certify that the works were constructed in accordance with the conditions of the works approval;
 - (b) be signed by a person authorised to represent the Works Approval Holder and contain the printed name and position of that person within the company.



Schedule 1: Maps

Premises map

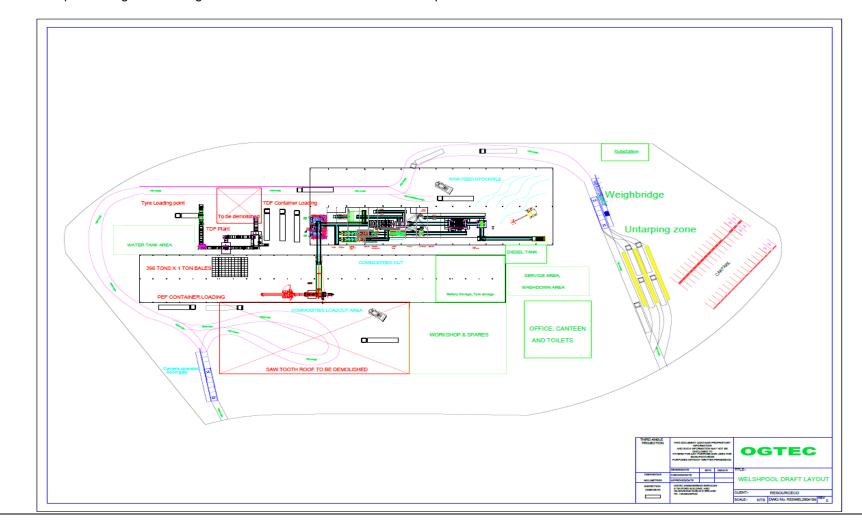
The Premises is shown in the map below. The pink line depicts the Premises boundary.





Premises overview

The Premises processing areas and general site overview is shown in the map below.



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Decision Document

Environmental Protection Act 1986, Part V

Proponent: ResourceCo Pty Ltd

Works Approval: W5852/2015/1

Registered office:	C/O Hood and Sweeney Pty Ltd Level 3 11-16 South Terrace ADELAIDE SA 5000
ACN:	068 976 803
Premises address:	Welshpool Fully Integrated Resource Recovery Facility 78 Adams Drive WELSHPOOL WA 6106 Being Lot 801 on Plan 39925.
Issue date:	Thursday, 1 October 2015
Commencement date:	Monday, 5 October 2015
Expiry date:	Tuesday, 4 October 2016

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue a works approval. DER considers that in reaching this decision, it has taken into account all relevant considerations and that the Works Approval and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by:	Josephine Tuohy Licensing Officer
	Lauren Fox Licensing Officer
Decision Document authorised by:	Rebecca Kelly Manager Licensing



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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.



2 Administrative summary

Administrative details			
Application type	Works Approval New Licence Licence amendment Works Approval amendm		
	Category number(s)	Assessed design capacity	
Activities that cause the premises to become prescribed premises	57	25,000 tyres stored at any one time with an annual throughput of 16,500 tonnes	
	61A	220,000 tonnes per annual period	
Application verified	Date: 10/06/2015		
Application fee paid	Date: 11/06/2015		
Works Approval has been complied with	Yes No N	/A 🖂	
Compliance Certificate received	Yes No N	/A⊠	
Commercial-in-confidence claim	Yes⊠ No⊡		
Commercial-in-confidence claim outcome	Accepted		
Is the proposal a Major Resource Project?	Yes No		
Was the proposal referred to the Environmental		erral decision No:	
Protection Authority (EPA) under Part IV of the Environmental Protection Act 1986?	Yes No Mai	naged under Part V	
	Ass	essed under Part IV	
		isterial statement No:	
Is the proposal subject to Ministerial Conditions?	Yes No EP/	A Report No:	
Does the proposal involve a discharge of waste	Yes No		
into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Department of Water cor	sulted Yes 🗌 No 🗌	
Is the Premises within an Environmental Protection	Policy (EPP) Area Yes] No	
Is the Premises subject to any EPP requirements?	Yes No		



3 Executive summary of proposal and assessment

Background

ResourceCo Pty Ltd (ResourceCo) has applied for a prescribed premises Category 61A (solid waste facility) Works Approval to construct a resource recovery facility. ResourceCo also plans to relocate their tyre recycling business, TyreCycle, from its current licensed site (L8694/2012/1) in O'Connor to this facility. This is planned for September 2017.

This Works Approval application includes Category 57 (used tyre storage – general) which has a design capacity of 16,500 tonnes per year, with a maximum number of 25,000 individual tyres (200 tonnes) stored at any one time. ResourceCo does not anticipate this number of tyres to be stored as a regular occurrence and will likely only occur in the event of breakdowns or maintenance requirements. The proposed facility has a design capacity of 220,000 tonnes per annum which includes total throughput for both 57 and 61A activities.

ResourceCo is ISO14001, ISO9001 and ISO18001 certified.

Location in environmental setting

The premises is located on Lot 801 on Plan 39925 (street number 78) Adams Drive, Welshpool, within the City of Canning and is zoned general industry. The premises has planning approval for the proposed operations which is valid for a period of 24 months. Any licence following the issue of this works approval will be aligned to also expire on this date with any licence renewals subject to further planning approval.

Groundwater onsite is located 3 metres below ground level. The nearest residents are located approximately 600 metres north west of the site. The closest surface water to site is the compensation basin that is a part of the Mills Street Main Drain system and is located approximately 30 metres north-west of the site at Lot 3689 on Plan 16576. The Mills Street Main Drain is an artificial drainage network that is a catchment for the Canning River located approximately 2.6 Kilometres south west of the site. The compensation basin is owned by the Department of Lands and managed by the City of Canning. There are no major water supply dams in the catchment. The premises is situated on the Swan Coastal Plain and is approximately 2.6 Kilometres north of the Canning River. The main land uses in the area are light industry, commercial and urban areas.

The Environmental Protection Authority's *Guidance Statement No. 3, Separation Distances between Industrial and Sensitive Land Uses* (EPA's No.3), recommends a separation distance of 500-1000 metres (depending on the facility size) for a premises that recycles used tyres, with the main emissions considered to be gas, noise, dust and odour. EPA's No. 3 also recommends the separation distance for a resource recovery plant to be assessed 'case by case', with the main emissions considered to be gas (not considered a significant risk for this site), noise and odour. The closest sensitive receptor (resident) is located approximately 600 metres north-west of the premises and meets the recommend buffer distance in the EPA's No. 3.

The site has 14,000m² of undercover workshops and sheds that will enable all screening and processing to be undertaken within the enclosed sheds/workshops. Baled plastic and end of use tyres will be stored outside.

Proposal

ResourceCo are proposing to accept, store and process solid waste materials including:

- Inert waste type 1
- Inert waste type 2 tyres and plastics
- Putrescible waste paper, cardboard and timber only
- Construction and demolition waste



- Clean fill soils
- Solid waste
- Hazardous wastes lead acid batteries and end of life gas bottles only

Waste materials will be deposited into designated areas depending on waste type classification. Waste will be received, sorted and processed in an enclosed building with concrete floors. Processed finished waste materials are to be regularly transported off-site for their intended re-use.

The sorting and processing will incorporate the use of a pre-sort and waste material inspection to assist in the acceptance of appropriate wastes entering the processing lines. Sizing equipment will be used to place waste on the conveying equipment and which is then transported through a series of screens, mechanical and pneumatic equipment, with hand picking. These processes allow the waste material to be sorted into separate waste types prior to local transport offsite or baling and wrapping for export.

Tyres will be graded prior to shredding in a primary and then secondary shredder and then loaded into containers using a bobcat with a specialised grab attachment. Tyres will be processed daily. The shredder has an anticipated production rate of 6 to 8 tonnes per hour. Conveyor belts and rubber will also be processed through the shredder. Used tyres/ conveyor belts/rubber will enter the shredder by direct loading from delivery trucks. In the event that maintenance works are required, the tyres/conveyor belts/rubber will be stored in a designated area outside area. The occupier has advised that tyres any stored tyres will be managed in a neat, tidy and efficient manner. Shredded tyres/conveyor belts/rubber will be stored directly into shipping containers for removal offsite.

Wet acid batteries will be processed monthly, all wet acid batteries will be wrapped and stored under cover of the main hardstand facility.

ResourceCo proposes to recover several different wastes streams including:

- Timber
- Paper, cardboard
- Ferrous & nonferrous metals
- Bricks, rubble and concrete
- Plastic baling and export for use as Processed Engineered Fuel (PEF)
- Glass
- Tyres, conveyor belts and rubber
- Soil

Wastes that cannot be sold will be taken to a suitably licensed disposal facility.

Works taking place

Construction activities will include installation of separating and processing production lines, triple interceptor for the stormwater drainage system, installation of a second weighbridge and replacing some damaged concrete floors.

The Works Approval will be issued to ResourceCo Pty Ltd for a period of one year, as the proponent has indicated that construction is only likely to only take a few months. After construction of the solid waste facility, ResourceCo will need to submit a compliance document to DER and apply for a Category 57 and 61A prescribed premises licence issued under Part V of 61A and 57 *Environmental Protection Act 1986*, before operations can commence.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, DEC's Policy Statement - Limits and targets for prescribed premises (2006), 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 TAE	BLE		
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	W1.2.1	 Construction The works approval will include a condition which specifies the requirement for the premises to be constructed in accordance with the supporting documentation. This condition has been included so that all works being undertaken have been considered and assessed as part of the works approval process. Operation See Appendix A 	Application supporting documentation <i>Environmental</i> <i>Protection</i> <i>(Unauthorised</i> <i>Discharge)</i> <i>Regulations</i> 2004
Premises operation	N/A	Construction IR1 of condition 2.1.1 has been included in the Works Approval to require the proponent to submit to the CEO an Asbestos Management Plan (AMP) in accordance with the ' <i>Guidelines for managing asbestos at construction and</i> <i>demolition waste recycling facility'</i> , Department of Environment and Conservation, December 2012. The AMP is required to demonstrate how potential asbestos contaminated waste is identified and managed at the site to reduce the risk of asbestos fines being released. Operation See Appendix B	'Guidelines for managing asbestos at construction and demolition waste recycling facilities' published by the Department of Environment and Conservation, as amended from time to time.



DECISION TABL	.E		
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to surface water including monitoring	N/A	Construction No point source emissions to surface water are expected during construction. No specified conditions relating to point source emissions to surface water have been included in the Works Approval. Operation Emission Description Emission Content of the store of the site (Lot 3689 on Plan 16576). Impact: Contamination of surrounding land, groundwater and surface water from leachate or environmentally hazardous materials. Controls: Leachate generating waste and environmentally hazardous materials will be stored and processed within an enclosed building. The stormwater system will be fitted with a triple interceptor to treat water. It will also be fitted with a sluice valve which can be closed (manually or automatically) in the event of spills or emergencies to prevent water from being discharged offsite. Risk Assessment Consequence: Moderate Likelihood: Unlikely Risk Rating: Moderate Regulatory Controls A condition will likely be included to require the sluice valve to be closed if stormwater is suspected to be contaminated. Licence conditions may also be included to require the potentially contaminated stormwater to be sampled prior to discharge. This is assist in reducing the risk of contamination to groundwater and surface water. The discharge of stormwater to the compensation basin may also be subject to regulation under the Environmental Protection (Unauthorised	Environmental Protection Act 1986 Environmental Protection (Unauthorised Discharge) Regulations 2004 Application supporting documentation



DECISION TAB			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to surface water including monitoring continued		Discharge) Regulations 2004. <u>Residual Risk</u> Consequence: Moderate Likelihood: Unlikely Risk Rating: Moderate	
Fugitive emissions	N/A	Construction There are only minor works to be carried out during the Works Approval stage and dust emissions are expected to be minimal. Dust emissions can be sufficiently regulated under section 49 of the <i>Environmental Protection Act 1986</i> therefore there are no specified conditions relating to fugitive emissions required on the Works Approval.	Environmental Protection Act 1986 Application supporting documentation
		OperationEmission DescriptionEmission: There is a potential for dust emissions to be generated from the operations on site including shredding tyres, unloading and loading of materials and screening of waste materials.Impact: Reduced local air quality, with potential nuisance to the nearby sensitive receptors located 600m north west of the premises.Controls: The proponent has committed to unloading and processing all waste within the existing sheds. Integrated waste stockpiling, sorting and conveying equipment will incorporate misting systems to reduce any dust emissions. The secondary shredders also have dust reduction with the use of filter cartridges.	
		Risk Assessment Consequence: Minor Likelihood: Possible Risk Rating: Moderate	



DECISION TAB	LE		
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Fugitive emissions continued		Regulatory Controls In accordance with DER's licensing process, fugitive emissions of dust can be sufficiently regulated under section 49 of the Environmental Protection Act 1986. No specific conditions for dust are recommended for inclusion on the licence however if dust emissions cause any offsite nuisance, conditions for the preparation and implementation of a dust management plan may be considered. Residual Risk Consequence: Minor Likelihood: Possible Risk Rating: Moderate	
Odour	N/A	Construction Odour emissions are not expected to occur during construction therefore no specified conditions relating to odour have been included in the Works Approval. Operation Emission Description Emission: There is a potential for odour emissions to be generated during site activities based on the waste types accepted and processed on site. Some putrescible waste will be accepted on site including wood, paper and cardboard. Impact: Unreasonable odour emissions affecting the wellbeing and amenity of residents at the nearest sensitive receptor located approximately 600m north west of the premises. Controls: All processing and storage of waste will be undertaken within the existing shed. ResourceCo is not intending to accept putrescible wastes except for paper and wood therefore odour emissions are likely to be minimal.	Environmental Protection Act 1986 Application supporting documentation



DECISION TAR	DECISION TABLE					
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents			
Odour continued		Risk Assessment Consequence: Minor Likelihood: Possible Risk Rating: Moderate Regulatory Controls In accordance with DER's licensing process, odour emissions can be sufficiently regulated under section 49 of the Environmental Protection Act 1986. No specific conditions for odour are recommended for inclusion on the licence.				
		Residual Risk Consequence: Minor Likelihood: Possible Risk Rating: Moderate				
Noise		Construction and Operation Emission Description Emission: There is a potential for noise to be generated on site during construction and operation. Impact: Unreasonable noise emissions affecting the health and wellbeing of people at the nearest sensitive receptor approximately 600m north west of the premises. Controls: No specific noise controls are proposed however the application states that the shredder is designed to comply with the relevant Australian Standards for noise emissions. The proponent has provided a copy of an acoustic consultant report ResourceCo Pty Ltd 'Welshpool Integrated Resource	Environmental Protection (Noise) Regulations 1997 Environmental Protection Act 1986 Application supporting documentation			
		Recovery Facility, 24 Tomlinson Road, Welshpool, Noise Emissions Assessment' prepared by Herring Storer Acoustics, July 2015, to demonstrate expected compliance with <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations).	ResourceCo Pty Ltd Welshpool Integrated			



DECISION TABL	DECISION TABLE					
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents			
Noise continued		The report is based on the sound power level sources of the equipment to be used on site and the noise levels expected at the closest sensitive receptors. Noise levels have not been considered to contain annoying characteristics such as impulsiveness or tonality. Herring Storer Acoustics has calculated the maximum expected noise levels (during 2200 – 0700 hours) at an industrial premises south of the site to be a value of 64 dB with an assigned level of 65 dB in the Noise Regulations. The report has calculated a level of 26 dB at the nearest residential property which has an assigned level of 43 dB. Based on the calculations in the report, premises operations are expected to comply with the assigned levels in the Noise Regulations. <u>Risk Assessment</u> Consequence: Moderate Likelihood: Possible Regulatory Controls The Environmental Protection Act 1986 and Environmental Protection (Noise) Regulations 1997 are considered sufficient to regulate noise emissions for construction and operations. <u>Residual Risk</u> Consequence: Moderate Likelihood: Possible Residual Risk Rating: Moderate	Resource Recovery Facility, 24 Tomlinson Road, Welshpool, Noise Emissions Assessment' by Herring Storer Acoustics July 2015			



DECISION TABL	Ε		
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Monitoring general	N/A	 Construction No specified conditions in relation to monitoring general are required on the Works Approval. Operation Conditions will be considered for the licence which will address calibration requirements for all monitoring equipment on site. 	Application supporting documentation
Monitoring of inputs and outputs	N/A	ConstructionThe proponent will not be accepting waste during the construction phase, therefore conditions relating to monitoring of inputs and outputs are not required on the Works Approval.OperationIt is likely that a condition will be included on the licence to monitor the waste inputs and outputs. This condition will allow DER to regulate the volume of wastes authorised for acceptance under the licence.	Application supporting documentation
Improvements	N/A	Construction Improvement conditions are not required under the works approval. Operation The requirement for improvement conditions on the licence will be assessed during the licence application process.	
Information	W3.1.1 – W3.1.2	Construction The Works Approval includes conditions requiring the occupier to submit a compliance document once construction works have been completed, and prior to any operations commencing, and that the compliance document shall contain	

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DECISION TABLE					
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents		
		certification that all works have been undertaken in accordance with the Work Approval and is required to be authorised by a representative of the occupier. These conditions allow DER to verify that all works have been constructed as authorised and assessed through the Works Approval process and have been constructed to reduce the impact of emissions and discharges from the premises.			
		Operation Conditions for the requirement of specific information, such as a complaints management system and submission of an Annual Environmental Report, will be considered as part of the licence application.			
Works Approval Duration	N/A	It is recommended that the Works Approval be issued for a period of one year as the construction will take approximately two to three months. A Licence application for the recycling facility has already been submitted to DER for assessment. The licence duration will be considered in line with the planning approval expiry date of 24 months which would bring the licence expiry date to 20 August 2017. Any licence renewals will require extended planning approval to be granted.	N/A		



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
15/06/2015	Application advertised in West Australian (or other relevant newspaper)	N/A	N/A
15/06/2015	Application referred to interested parties listed: City of Canning	No comments were received. DER has noted that planning approval was granted on 21 August 2015 for a period of 24 months and includes the stormwater to the compensation basin.	N/A
24/09/2015	Proponent sent a copy of draft instrument	Proponent happy with the documents	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
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Likelihood			Consequence	equence		
	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	



Appendix A

General Conditions

Operation

Emission Description

Emission: Stormwater contaminated from waste storage and processing on site.

Impact: Contamination of surrounding land, groundwater and surface water drainage systems. Potential impacts to groundwater (approximately 3 metres below ground level) are expected to be limited as the site is sealed with concrete/asphalt. Proposed discharge is to the compensation basin that is a part of the Mills Street Main Drain system located approximately 30 metres north-west of the site.

Controls:

• Hydrocarbon storage

ResourceCo is proposing to utilise the existing hydrocarbon storage facilities at the site. The existing storage consists of a 5,000 litre self bunded steel tank. The site will also be equipped with spills kits.

• Stormwater System:

The existing stormwater system is designed to collect stormwater from all roofs and sealed surface runoff and directs the water via the underground drainage system to the off-site stormwater compensation basin located at Lot 3689 on Plan 16576. The majority of the site is roofed and the site surfaces are sealed with concrete or bitumen. All processing and storage of leachate generating and environmentally hazardous wastes will be undertaken within the enclosed sheds.

Written approval has been provided from the City of Canning to confirm that it has no objection to the stormwater discharging to the compensation basin.

ResourceCo have commissioned a consultant (Waste Water Services) to design an interceptor trap to contain, sediment, oil, fats grease and litter at the point of discharge of the stormwater from the site. The interceptor trap will consist of three chambers each with a capacity of 20,000 litres. The interceptor trap will incorporate a sluice valve to isolate the stormwater drain from the compensation basin. In the event of a spill the sluice valve will be activated to prevent contaminated material from entering the environment. The material will then be pumped out and removed off-site to a suitably licensed facility.

• Fire wastewater

ResourceCo is proposing to accept, store and shred used tyres on site prior to removing off site for resale. A topographic survey was undertaken to determine the site gradients. The survey found that the site is generally flat and as such it was determined that in the event of a fire, expended fire wastewater would be directed into the stormwater drainage system. The Stormwater drainage system will have capacity of 60,000 litres. The fire wastewater will be retained on site within the interceptor trap as the sluice valve will be automatically activated when the fire suppression system is activated. If the event that the sluice valve does not activate, it can be manually activated. Any remaining fire wastewater will be retained on site by the premises boundary bunding.

Wash-down Bay

There is an existing wash-down bay on site that is bunded and roofed and incorporates an oily water treatment system prior to discharge to sewer. Mobile equipment including forklifts and vehicles will be cleaned in this area. The bund capacity is 3,500 litres. The occupier is required to obtain an industrial discharge permit from the Water Corporation before this wash bay can be used. This approval will be required prior to an operational licence being issued.



Risk Assessment Consequence: Moderate Likelihood: Possible Risk Rating: Moderate

Regulatory Controls

As with any industrial premises there is a potential for spills of cleaning agents, fuels and other chemicals to occur. A condition will be included on the licence to require any spills of environmentally hazardous materials to be cleaned if they occur outside of designated storage areas. This condition will assist in reducing the risk of storm water becoming contaminated.

A condition will be included on the licence to require the operator to operate and maintain a surface water management system that directs stormwater away from the storage and processing areas which also assists in reducing the risk of stormwater becoming contaminated.

A condition is likely to be included on the licence to require that in the event of a fire, the expended fire wastewater/foam is to be captured on site for disposal off-site at a suitably licensed facility. This condition will assist is reducing the likelihood of fire wastewaters entering the environment.

Residual Risk Consequence: Moderate Likelihood: Unlikely Risk Rating: Moderate



Appendix B

Premises Operation

Reference documents:

- Environmental Protection Act 1986
- Landfill Waste Classification and Waste Definitions 1996 (as amended)
- Department of Environment Conservation 'Guidelines for managing asbestos at construction and demolition waste recycling facilities', December 2012
- Application supporting documentation

Construction

There are no specified conditions relating to premises operations required in this section.

Operation

Emission Description - Waste acceptance

Emission: Potential discharges to land from hazardous liquid and solid waste including leachate. *Impact:* Contamination of surrounding land, groundwater and surface water from environmentally hazardous materials through inadequate receival, handling and storage procedures.

Controls: The proponent has committed to having a security guard present 24 hours a day 7 days a week. The site will have a gatehouse and weighbridge at the main entrance. All waste will be assessed prior to acceptance on site. Cyclone mesh fencing with lockable gates will be positioned along the perimeter of the premises. Air borne litter is expected to be minimal as all waste storage and processing will be undertaken within the sheds. Litter will be monitored and undertaken by staff on a regular basis. Screening and processing of waste will be undertaken inside an enclosed shed.

Risk Assessment

Consequence: Minor *Likelihood*: Possible *Risk Rating:* Moderate

Regulatory Controls

Conditions will be included on the licence to limit the types and quantities of waste for acceptance at the premises, to wastes that have been assessed by DER and can be adequately managed under the occupier's infrastructure and process controls. Any additional wastes not included on the licence will not be authorised or considered in DER's assessment of premises controls and a condition will be included to remove non-confirming waste from the premises to mitigate the potential leachate risk of runoff from stockpiling non-confirming waste.

Conditions will be included on the licence to require adequate security measures are implemented at the site to prevent illegal entry.

Conditions may also be included to require the management of windblown waste to prevent litter and management of pests and vermin to prevent nuisance issues.

<u>Residual Risk</u> Consequence: Minor *Likelihood:* Unlikely *Residual Risk Rating:* Moderate



Emission Description - Asbestos

Emission: Asbestos fibres released into the atmosphere as a result of handling and screening asbestos-containing waste accepted onsite.

Impact: Inhalation of asbestos fibres by persons on site and surrounding areas causing significant health effects. The site is located within an industrial area surrounded by other businesses. The nearest resident is located 600m north west of the premises.

Controls: ResourceCo have stated that asbestos containing material will not be accepted onsite. The Works Approval will include an improvement condition for ResourceCo to submit to the CEO an Asbestos Management Plan in accordance with 'Guidelines for managing asbestos at construction and demolition waste recycling facilities'.

<u>Risk Assessment</u> Consequence: Major Likelihood: Unlikely Risk Rating: Moderate

Regulatory Controls

OSC 4.1.1 and 4.1.2 have been included in the Works Approval to require the proponent to submit to the CEO an Asbestos Management Plan (AMP) in accordance with the '*Guidelines for managing asbestos at construction and demolition waste recycling facility*', Department of Environment and Conservation, December 2012. All premises that accept mixed waste streams, including construction and demolition waste, have a risk of asbestos contamination. This AMP is required to demonstrate how asbestos is identified and managed at the site to reduce the risk of asbestos fines being released.

Residual Risk Consequence: Major Likelihood: Unlikely Residual Risk Rating: Moderate

Operation – Emergency Situation

Emission Description

Emission: Tyres are not easily ignitable, however when alight they are extremely difficult to extinguish. Tyre fires can break down the tyres into hazardous compounds including gases, heavy metals and oil. Air emissions can also be generated including polycyclic aromatic hydrocarbons (PAHs), benzene, styrene, phenols, butadiene and some heavy metals. Firefighting foam may contain hazardous materials including surfactants, emulsifiers and modifiers.

Impact: Tyre fires can result in polluted soil and surface water from both fallout and runoff from firefighting waters/foams discharged to the environment via drainage systems. In addition toxic gases from fire smoke can significantly impact on the respiratory system of the community through inhalation of particulates.

Controls: ResourceCo will engage a qualified industry expert to evaluate the requirements of the site to meet Department of Fire and Emergency Services (DFES) requirements. Once the site has been assessed, adequate firefighting capacity will be provided. Access between fixed plant, storage locations and boundaries will be maintained to allow access to emergency vehicles. The nature of the processing facility requires the facility to incorporate smoke detection, water monitors and hydrant protection. Dry powder fire extinguishers will be installed adjacent to plant and machinery as well as the officers and fuel storage areas. Expended fire wastewater used in the event of a fire will be controlled via the existing stormwater control system. The sluice valve installed at the discharge point of the stormwater system will automatically activate (close) to prevent discharge off-site. All captured wastewater will be discharged to an appropriately licensed facility.



Risk Assessment Consequence: Moderate Likelihood: Possible Risk Rating: Moderate

Regulatory Controls

Conditions will be included on the licence to regulate appropriate storage of tyres that allows for sufficient buffer zones, restricted stack sizes and easy access for fire equipment. It is the intent of these conditions to assist in reducing the size and duration of emissions in the unlikely event of a fire. A condition will also be included requiring no waste to be burnt on site.

Given that any fire wastewaters will enter the stormwater drainage system, a condition will be included on the licence requiring the sluice valve to be activated in the event of a fire. This will also in preventing the discharge of fire wastewaters offsite. It is noted that any discharges offsite may be subject to regulation under the *Environmental Protection (Unauthorised Discharge) Regulations 2004.*

<u>Residual Risk</u> Consequence: Moderate Likelihood: Unlikely Residual Risk Rating: Moderate