



Works Approval

Environmental Protection Act 1986, Part V

Works Approval Holder: Alvito Pty Ltd T/A Incredible Bulk

Works Approval Number: W5942/2015/1

Registered office: Suite 13, Level 1
123A Collins Street
WEST PERTH WA 6005

ACN: 008 845 378

Premises address: Incredible Bulk
Lease Area 17
190 Flynn Drive
NEERABUP WA 6031
Being part Lot 5 on Diagram 91435 and bound by the coordinates, as depicted in Schedule 1.

Point	Easting	Northing
1	68624.816	293578.622
2	48424.816	293401.749
3	48293.556	293401.740
4	68293.556	293390.480
5	48128.576	293390.480
6	48128.576	293571.572

Issue date: Thursday, 21 April 2016

Commencement date: Monday, 25 April 2016

Expiry date: Friday, 24 April 2020

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
13	Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned.	1,000 tonnes or more per year	160,000 tonnes per annual period
62	Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	500 tonnes or more per year	300,000 tonnes per annual period



Conditions

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

Date signed: 20 April 2016

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Alan Kietzmann

Manager Licensing (Waste Industries)
Officer delegated under section 20
of the *Environmental Protection Act 1986*



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;

'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
Email: info@der.wa.gov.au

'clearing' means any clearing of native vegetation as defined in the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*;

'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;

'w/w' means weight for weight;

'Works Approval' means this Works Approval numbered W5942/2015/1 and issued under the Act; and

'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 Requirements¹

Document	Parts	Date of Document
Application form: works approval / licence	All	23 November 2015
Incredible Bulk works approval application supporting documentation, IWProjects, prepared for Alvito Pty Ltd, Final Rev 1.	All, including Drawings and Appendices	21 December 2015
Incredible Bulk Flynn Drive Lease Area 17 Inert Waste Sorting, Processing and Transfer Operation, Dust Management Plan	All	November 2015
Incredible Bulk Flynn Drive Lease Area 17 Inert Waste Sorting, Processing and Transfer Operation, Asbestos Management Plan	All	November 2015
Herring Storer Acoustics, IW Projects, Lot 5 (190) Flynn Road, Neerabup Noise Emission Assessment	All	October 2015

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.

1.2.2 The Works Approval Holder must ensure that the Works specified in Column 1 of Table 1.2.2 meet or exceed the specifications in Column 2 of Table 1.2.2 for the infrastructure in each row of Table 1.2.2.

1.2.3 The Works Approval Holder must not depart from the specifications in Column 1 and 2 for the infrastructure in each row of Table 1.2.2 except:

- a) where such departure is minor in nature and does not materially change or affect the infrastructure; or
 - b) where such departure improves the functionality of the infrastructure and does not increase risks to public health, public amenity or the environment;
- and in accordance with all other conditions in this Works Approval.

Table 1.2.2: Infrastructure to be constructed

Infrastructure	Details
Dust suppression system	The dust suppression system comprises the following: <ul style="list-style-type: none"> • Piped reticulation systems strung along the lease perimeter boundary; and • Piped reticulation systems of sprinklers strategically placed to cover dust generating operations and material stockpiles.
Vibrating screen	A dust suppression system installed on the screening equipment at the input and output conveyors. This system will operate at 30L/minute at 200kPa.
Crusher	Terex Pregson 1165 that processes 50 to 70 tonnes/hour (or equivalent). Fitted with a dust suppression system that will operate at 30L/minute at 200kPa.

1.2.4 The Works Approval Holder is not authorised to undertake any clearing under this works approval.

2 Information

2.1 Reporting

2.1.1 The Works Approval Holder shall submit a compliance document to the CEO, following the construction of the works.



2.1.2 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 Premises boundary is depicted by the grey shaded area.





Decision Document

Environmental Protection Act 1986, Part V

Proponent: Alvito Pty Ltd T/A Incredible Bulk

Works Approval: W5942/2015/1

Registered office: Suite 13, Level 1
123A Colins Street
WEST PERTH WA 6005

ACN: 008 845 378

Premises address: Incredible Bulk
Lease Area 17
190 Flynn Drive
NEERABUP WA 6031
Being part of Lot 5 on Diagram 91435

Issue date: Thursday, 21 April 2016

Commencement date: Monday, 25 April 2016

Expiry date: Friday, 24 April 2020

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), CEO delegated officer has decided to issue a works approval. The delegated officer considers that in reaching this decision, he has taken into account all relevant considerations and legal requirements 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

Decision Document authorised by: Alan Kietzmann
Delegated Officer



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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 <input checked="" type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	13	160,000 tonnes per annual period
	62	300,000 tonnes per annual period
Application verified	Date: 24/12/2015	
Application fee paid	Date: 15/01/2016	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.		



3 Executive summary of proposal and assessment

1. Background

Alvito Pty Ltd trading as Incredible Bulk has applied to DER for a Category 13 and Category 62 works approval and licence for the operation of a waste crushing and recycling facility at Lease area 17, Lot 5 on Diagram 91435 Flynn Drive, Neerabup that has a design capacity of 300,000 tonnes per annum.

Lot 5 on Diagram 91435 is owned by Alvito Pty Ltd and is divided into a number of smaller lease areas which are leased out to various companies.

The premises is located within the City of Wanneroo and is currently zoned 'Rural' with 'Residential Urban Development' zoning on the southern side of Flynn Drive. The site is located within the Neerabup Industrial estate, however, in an area of the estate that is yet to be formally developed. The City of Wanneroo has issued planning approval for Industry – General (Storage and Sorting Activity) that expires on 2 December 2020. The owner of the property is intending to review the site utilisation and amend the site lease arrangement to be in line with the surrounding activities. The premises is intended to operate for a 5 year period only and the licence will only be issued for a 4 year period so as to not exceed the planning approval.

A separate Clearing Permit Application was submitted by PGV Environmental on behalf of Alvito Pty Ltd on 16 February 2016 as part of the Works Approval application. Alvito Pty Ltd had applied to clear 3.1 hectares of native vegetation within Lease Area 17, Lot 5 on Diagram 91435 Flynn Drive, Neerabup. At this stage, DER's Clearing Regulation Branch has not finalised this decision and as such no clearing is permitted at this stage. Once the Clearing Permit application has been assessed and a decision finalised, DER will amend the Works Approval and Licence to reflect this assessment.

2. Location in environmental setting

The closest residential premises are located approximately 800 metres to the south.

Department of Water's Perth Groundwater Atlas indicates that groundwater level is found at a depth of 26 metres (m). There are no watercourses or wetlands within the premises boundary, the closest surface water body is Lake Pinjar, a conservation category wetland located approximately 1.5 kilometres (km) north east of the premises. A priority 1 and priority 3 Drinking Water Source Area (PDWSA) are located 1.8 km north east and 1.2 km south west of the premises respectively.

Threatened Ecological Community (TEC) '*Banksia attenuata* woodland over species rich dense shrublands' (SCP20a) is located approximately 10 m west of the application area. The premises is located within the buffer zone of this TEC.

Two soils types are mapped within the premises boundary; siliceous sands and brown sands. Bush Forever site 295 is located approximately 20 m south of the application area and Bush Forever site 428 is located 1.5 km north. Groundwater salinity is mapped as 500-1000 mg/L Total Dissolved Solids, that is considered low and has an annual rainfall of 800 millimetres.

3. Proposal

Construction Stage:

Minor construction works are to the site including earthworks to level the site, site office and staff amenities and installation of a dust suppression system.

Operation Stage:

The Proponent proposes to receive material predominantly from its own collection business and also receive material from other commercial waste collection companies. The waste material will predominantly be from construction and demolition activities (concrete, blocks, bricks, rubble, sand,



plastic strapping and wrapping, cardboard boxes, pallets, scrap timber and minimal greenwaste). The following waste types will not be accepted at the site: municipal solid waste (residential kerbside collection), putrescible waste (other than cardboard, timber and green waste), asbestos, liquid waste or other problematic waste materials.

Wastes will be sorted to separate the material into reusable or recyclable material and waste residue. The reusable or recyclable material is stored separately and subsequently removed to downstream recyclers, while the waste residue is placed in waste bins or trucks and removed from site to the appropriate class of landfill for final disposal. The facility will operate Monday to Saturday – 7.00 am to 5.00 pm; and, be closed on Sundays and public holidays.

The activities undertaken on site are:

- Receival and inspection of waste
- Sorting of waste material into recyclable and residual components
- Crushing of inert materials
- Storage of waste and recyclable material pending removal
- Off site removal

The sorting and waste handling processes involves a range of activities including:

- Mechanical sorting from stockpiles to remove larger recyclable and waste materials
- Mechanical screening of mixed waste
- Picking belt
- Removal of non-compliant waste materials for appropriate off-site disposal.

The lease area consists of a fully fenced limestone / crushed rubble surface with lockable gates. Also has a dedicated water supply from communal groundwater bore. Groundwater licence 179117.

The Environmental Protection Authority's Guidance Statement No 3, *Separation Distances between Industrial and Sensitive Land Uses*, recommends a separation distance of 1,000 m for a premises that undertakes crushing, with the main emissions considered to be noise and dust; this premises does not meet this distance.

All potential emissions and proposed control measures are discussed in the Decision Document.

The Works Approval will be issued to Alvito Pty Ltd for a period of three years despite the works likely to be completed within a 3-4 month period. Once the works have been completed the Licensee will be required to submit a compliance document. The Licence will be issued for a period of 4 years subject to compliance with the works approval consitions, and which is in line with the City of Wanneroo's planning approval.



4 Decision table

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

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	W1.2.1 - W1.2.4	<p>Construction</p> <p>Condition W1.2.1 has been included in the Works Approval 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. The proposed construction activities, which include:</p> <ul style="list-style-type: none">• Earthworks to level the site;• Site office and staff amenities; and• Dust suppression system. <p>Condition 1.2.2 and 1.2.3 have been included to specify that the Works Approval holder must ensure the Works meet or exceed the infrastructure details that were submitted as part of the Works Approval application.</p> <p>Condition 1.2.4 does not authorise the clearing of native vegetation. The application to clear will be considered separately. Regulatory controls relating to the clearing, if approved, will be incorporated into the works approval through a DER-initiated amendment.</p> <p>The application does not specify whether environmentally hazardous materials (hydrocarbons) will be stored onsite or delivered through a mobile unit as is needed. Any spillages of environmentally hazardous materials will be subject to the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulation 2004</i> and so</p>	<p>Application supporting documentation</p> <p>Environmental Protection (Unauthorised Discharges) Regulation 2004</p>



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Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		should be immediately recovered, or removed and disposed of in an appropriate manner.	
Premises operation	L1.2.1 – 1.2.23	<p>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. The proposed construction activities, which include:</p> <ul style="list-style-type: none"> • Earthworks to level the site; • Site office and staff amenities; and • Dust suppression system. <p>Condition 1.2.2 does not authorise the clearing of native vegetation. The application to clear will be considered separately. Regulatory controls relating to the clearing, if approved, will be incorporated into the works approval through a DER-initiated amendment.</p> <p>Operation Condition 1.2.1 specifies the waste types and quantity limits that may be accepted at the premises to those that have been assessed under the licence application as suitable given the infrastructure and control measures at the premises.</p> <p>Condition 1.2.2 specifies that where waste is found to be non-conforming, the waste is segregated and removed offsite to ensure compliance with condition 1.2.1. Condition 1.2.3 further specifies that any non-conforming waste due to asbestos content is bagged, clearly labelled and segregated.</p> <p>Condition 1.2.16 limits the waste processing that can occur after assessment of the licence application given the infrastructure and control measures at the premises.</p>	<p>Application supporting documentation</p> <p>Code of Practice for the Safe Removal of Asbestos 2nd Edition</p> <p><i>Health (Asbestos) Regulations 1992</i></p> <p>'Incredible Bulk, Flynn Drive Lease Area 17 Inert Waste Sorting, Processing and Transfer Operation, Asbestos Management Plan', November 2015.</p> <p>Incredible Bulk Flynn Drive Lease Area 17, Inert</p>



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		<p>Includes specification that no waste may be landfilled (buried) at the premises.</p> <p>Asbestos risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Asbestos fibres from non-conforming waste brought onto the premises and from crushing activities on site. <i>Impact:</i> Asbestos fibres can have severe health impacts including asbestosis and mesothelioma. The nearest residents are located approximately 800 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The licensee does not accept asbestos containing materials. The licensee implements an asbestos management plan that complies with DER's asbestos guidelines. Controls include staff training to identify asbestos, inspecting all loads prior to and during unloading for suspect material, isolating and segregating suspected asbestos, keeping stockpiles and unloading areas damp, monitoring and product testing. Asbestos / ACM loads are removed from the premises within 48 hours.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Major <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the moderate risk rating for asbestos, a number of conditions have been specified in this licence that are in line with the DER's Asbestos Guidelines and the proponents commitments detailed in 'Incredible Bulk, Flynn Drive Lease Area 17 Inert Waste Sorting, Processing and Transfer Operation, Asbestos Management Plan', November 2015.</p>	Waste Sorting, Processing and Transfer Operation, Dust Management Plan, November 2015



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		<p>Condition 1.2.1 specifies that waste containing visible asbestos or asbestos containing material shall not be accepted.</p> <p>Condition 1.2.3 specifies that identification and segregation of any identified asbestos content is required.</p> <p>Condition 1.2.4 specifies that the Licensee must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.</p> <p>Condition 1.2.5 the Licensee must include a 'no asbestos' clause in all contracts with material sources.</p> <p>Condition 1.2.6 The Licensee must maintain a clearly visible sign saying 'no asbestos' at the entry to the Premises.</p> <p>Condition 1.2.7 The Licensee must only accept Inert Waste Type 1 with a signed declaration from the supplier that warrants that the load does not contain any asbestos or ACM.</p> <p>Condition 1.2.8 The Licensee must visually inspect all loads prior to unloading and during unloading to ensure that the material does not contain visible asbestos or ACM.</p> <p>Condition 1.2.9 specifies what actions are to occur when asbestos or ACM is confirmed in accordance with the DER's Asbestos Guidelines.</p> <p>Condition 1.2.10 Specifies that the Licensee must maintain Classified Loads in a damp state using appropriate dust suppression measures.</p> <p>Condition 1.2.11 specifies that the Licensee must ensure that suspected loads are</p>	



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		<p>isolated, kept damp and appropriately contained and the Licensee must comply with the Code of Practice for the Safe Removal of Asbestos 2nd Edition and the <i>Health (Asbestos) Regulations 1992</i>.</p> <p>Condition 1.2.12 specifies that the Licensee must ensure that suspected loads are classified as 'high risk' and managed in accordance with the DER Asbestos Guidelines. Condition 1.2.13 specifies that the Licensee must maintain records of all accepted loads which have been determined as Classified Loads or as 'high risk'.</p> <p>Condition 1.2.14 specifies that the Licensee must continue to visually inspect material on the Premises at all storage, sorting and processing states to identify asbestos.</p> <p>Condition 1.2.15 specifies that the Licensee must maintain material on the Premises in at least two separate stockpiles for unprocessed and processed material tested for ACM.</p> <p>Condition 1.2.17 requires the licensee to ensure that any recycled output contains no more than 0.001%w/w asbestos and condition 1.2.18 requires recycled outputs to be tested to ensure compliance with condition 1.2.17. These conditions ensure compliance with the DER asbestos guidelines.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Major <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p> <p>Fire risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Smoke emissions from fire at premises (green waste stockpiles) and/or</p>	



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		<p>contaminated fire-fighting water used to suppress fire entering the environment. Fire spreading to adjacent premises.</p> <p><i>Impact:</i> Smoke may cause nuisance impacts or exacerbate respiratory issues at nearby receptors. Smoke may impact local flora and fauna. The nearest residents are located 800 metres south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever reserve is located to the south and eastern boundaries.</p> <p><i>Controls:</i> The licensee has not proposed any specific fire control measures. Raw green waste is kept in stockpiles for a maximum of 7 days and taken off-site. Greenwaste is not mulched or composted on-site.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Table 1.2.2 requires that the green waste be stored in dedicated storage areas which are maintained in stockpiles with a 5 metre firebreak which is consistent with green waste storage requirements on similar prescribed premises, to reduce the risk of fire spreading and assists in fire fighters being able to readily access any burning green waste.</p> <p>Condition 1.2.20 specifies that no waste shall be burnt at the premises to avoid deliberate emissions and prevent potential for fire to spread to other parts of the premises or lot.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate</p>	



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		<p><i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p>Leachate risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Leachates generated from the storage of green waste which may contain organic compounds, terpenes, phenols and/or have a high biological oxygen demand (BOD) and nutrient concentrations being generated from greenwaste stored at the premises. <i>Impact:</i> Leachates may enter surface water or groundwater in the area, causing aquatic organism death or bioaccumulation of contaminants in the surrounding ecosystems. Groundwater is found at a depth of 26 metres and the nearest surface water body is located approximately 1.5 km to the north east of the premises. <i>Controls:</i> Green wastes are stored on limestone rubble for a maximum of 7 days.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the distance to groundwater the likelihood of leachates migrating to groundwater is considered unlikely given the waste type and restriction on the period for which storage is permitted. As the nearest surface water body is located 1.5 km north east and there are no local drainage channels the likelihood of leachates migrating to surface water bodies is considered unlikely. Any discharges from the premises can be regulated under the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p>	



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		<p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p>Hydrocarbon storage risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Hydrocarbon spill from diesel, oils and grease storage on site <i>Impact:</i> Hydrocarbons may enter surface water or groundwater in the area, causing aquatic organism death or degradation of the surrounding ecosystems. Groundwater is found at a depth of 26 m and the nearest surface water body is located approximately 1.5 km to the north east of the premises. <i>Controls:</i> The licensee has stated that the diesel is stored in a self-bunded fuel dispensing container. Oils and grease will be limited to small quantities of 5-25 litres and will be stored within shipping containers.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Given the containment in place and distance to groundwater the likelihood of hydrocarbons migrating to groundwater is considered rare. As the nearest surface water body is located 1.5 km north east the likelihood of leachates migrating to surface water bodies is also considered rare. Any discharges from the premises will be subject to the provisions of the <i>Environmental Protection (Unauthorised Discharges)</i></p>	



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		<p><i>Regulations 2004.</i></p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p>Stormwater risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Stormwater contaminated with Leachates generated from the storage of green waste and other waste types. <i>Impact:</i> Contaminated stormwater may enter surface waters in the area causing aquatic organism death or bioaccumulation of contaminants in the surrounding ecosystems. The nearest surface water body is located approximately 1.5 km to the north east of the premises. <i>Controls:</i> Stormwater drainage is managed across the whole of the Lot and flows in a north westerly direction towards a retention basin.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the predominant acceptance of inert waste types there is limited potential for stormwater to become contaminated. As the nearest surface water body is located 1.5 km north east and stormwater is directed to retention basin, leachate migrating to surface water bodies is considered unlikely. Any discharges from the premises can be</p>	



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		<p>regulated under the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p>Vermin</p> <p>Vermin may cause a public nuisance impacts at nearby receptors or potentially transmit infectious disease. Vermin attracted to the area may impact local flora and fauna ecosystems Given the limited volume of household waste and putrescibles that are accepted on site there is expected to be limited food source for such vermin. The applicant proposes to engage with a pest controller if vermin are identified on site. The applicant also proposes to use rat traps around the premises to identify if any rats or mice are present. Condition 1.2.21 requires the licensee to implement control measures to prevent infestations of pests, flies and vermin at the premises to minimise the likelihood of any impacts.</p>	
Emissions general	N/A	<p>Construction and Operation</p> <p>There are no ambient quality monitoring conditions required on the Works Approval or Licence.</p>	N/A
Fugitive emissions	<p>W – N/A</p> <p>L2.1.1</p>	<p>Construction and Operation</p> <p>Dust emissions risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Dust emissions from levelling the area under the works approval, and during operation the crushing of building material, stockpiling of waste, and vehicle</p>	<p><i>Environmental Protection Act 1986</i></p> <p>'Incredible Bulk Flynn Drive Lease Area 17 Inert Waste Sorting,</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>movements.</p> <p><i>Impact:</i> Dust can negatively impact the health, welfare and amenity of those on nearby properties as well as flora and fauna. The nearest residents are located 800 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever site is located adjacent to the west and southern boundaries and can be smothered in dust. The application area is within a TEC buffer.</p> <p><i>Controls:</i> The proponent submitted a dust management plan as part of its application. The proponent proposes the use of sprinklers throughout the site including stockpiles, a water truck to be used on site to wet access roads, work areas and stockpiles, reticulation sprinkler systems on dust generating operations and material stockpiles and crushing equipment will have dust suppression systems fitted. Other measures include speed restrictions, ceasing work during windy and dusty conditions, hydro-mulching, wetting down of dust-generating loads and maintaining a comprehensive complaints register.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> The Environmental Protection Authority's Guidance Statement No 3, <i>Separation Distances between Industrial and Sensitive Land Uses</i>, recommends a separation distance of 1,000 m for a premises that undertakes crushing, with the main emissions considered to be noise and dust. The closest sensitive receptor is located approximately 750 m south that is within the recommended separation distance.</p> <p>Given the location within the recommended buffer zone, and the risk assessment rating of moderate, a number of commitments from the submitted dust management plan</p>	processing and Transfer Operation, Dust Management Plan', November 2015



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>have been included as licence conditions to require that these specific actions are taken.</p> <p>Due to the short-term duration of levelling the area under the works approval, no specific conditions have been included. Fugitive emissions will be subject to the provisions of section 49 in the <i>Environmental Protection Act 1986</i>.</p> <p>For the Operation, the licence conditions proposes the following controls: Table 1.2.2 specifies that all loads must be wet down prior to unloading. Condition 1.2.22 and Table 1.2.5 requires the licensee to install and operate the free standing sprinkler system along the boundary as well as the spray jets on the crushing and screening equipment. Condition 1.2.23 requires all vehicles on the premises to drive at 20 km/hour or less to reduce the likelihood of dust generation from vehicular movement.</p> <p>Additionally, Condition 1.2.16 specifies that stockpiles must not exceed 7 m in height from the base of the stockpile in line with requirements on licences for similar operations in the precinct. Higher stockpiles are exposed to higher wind velocities and therefore greater potential of dust emissions. Higher stockpiles also have a higher discharge height and therefore dust can potentially travel a greater distance before it settles (larger impact plume).</p> <p>As there are residential properties located within 1,000 metres radius of the premises, Condition 4.1.3 has been included to require detailed information of complaints to ensure that in the event of a complaint the root cause can be determined, and the regulatory controls placed on the licence can be reviewed.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Risk Rating:</i> Moderate</p> <p>Windblown waste risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Windblown waste <i>Impact:</i> Windblown waste can negatively impact the amenity of those on nearby properties as well as flora and fauna. The nearest residents are located 800 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever site is located adjacent to the west and southern boundaries. The application area is within a TEC buffer. <i>Controls:</i> The licensee maintains perimeter fencing around the lease area and commits to undertaking regular litter collection activities.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Condition 1.2.19 has been included in the licence to ensure that Licensee prevents windblown waste escaping the Premises boundary and undertakes weekly collection of windblown waste.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p>	
Odour	W – N/A	<p>Construction Odour emissions are not likely to be present during construction.</p>	<i>Environmental Protection Act</i>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
	L1.2.16	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Odour from receipt and storage of putrescible wastes (green wastes, timber, pallets and cardboard), and potential temporary storage of non-conforming waste types. <i>Impact:</i> Odour can negatively impact on the welfare and amenity of those on nearby properties. The nearest residents are located 800 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The licensee does not accept any other putrescible waste types. Greenwaste is stored for a minimal time on site and no composting or mulching is taking place.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.2.16, Table 1.2.2 specifies that no green waste shall be processed or shredded at the premises, and requires green waste to be removed within 7 days to limit the potential for decomposition and odour generation.</p> <p>This assessment has determined that odour can be appropriately managed under the general provisions of the <i>Environmental Protection Act 1986</i> and therefore no additional conditions are required.</p> <p><u>Residual Risk</u></p>	1986



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low	
Noise	N/A	Construction and Operation <u>Emission Description</u> <i>Emission:</i> Noise emissions from crushing and screening activities, heavy machinery operation and vehicle movements on site. Activities on site may contribute to accumulative impacts given that several similar operations occur on the same lot and multiple crushers may operate at the one time. <i>Impact:</i> Noise can cause a nuisance for people on nearby properties and may disturb native fauna. The nearest residents are located approximately 800 m south and there are industrial / farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The Licensee has provided a noise assessment which demonstrates that they can meet the assigned noise levels in the <i>Environmental Protection (Noise) Regulations 1997</i> . The site operating hours are 7:00 am to 5:00 pm Monday to Saturday. The Licensee has committed to continual monitoring of noise emissions and taking corrective actions in the event of excessive noise emissions such as ceasing operations, staged operations or altering equipment used. The licensees located on the same Lot have committed to only operating one crusher at any one time therefore reducing potential impacts from cumulative noise emissions. <u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate <u>Regulatory Controls</u>	<i>Environmental Protection (Noise) Regulations 1997</i> 'Herring Storer Acoustics, IW Projects, Lot 5 (190) Flynn Road, Neerabup, Noise Emissions Assessment', October 2015.



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>No conditions relating to noise are proposed for the licence as any noise emissions can be adequately managed under the <i>Environmental Protection (Noise) Regulations 1997</i>. Should noise be identified exceeding prescribed standards, controls may be placed in the licence to require a noise assessment and implementation of noise attenuation measures.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p>	
Monitoring general	N/A	<p>Construction and Operation There are no monitoring general conditions required on the Works Approval or Licence.</p>	
Monitoring of inputs and outputs	<p>W – N/A</p> <p>L2.1.1</p>	<p>Construction The proponent will not be accepting waste during the construction phase, therefore condition relating to monitoring of inputs and outputs are not required on the works approval.</p> <p>Operation Condition 2.1.1 requires the licensee to monitor inputs and outputs. This information is required to determine compliance with condition 1.2.1 throughput limits and validate annual fee submissions.</p>	
Ambient quality monitoring	N/A	<p>Construction and Operation There are no ambient quality monitoring conditions required on the Works Approval or Licence.</p>	N/A
Meteorological monitoring	N/A	<p>Construction and Operation There are no meteorological monitoring conditions required on the Works Approval or Licence.</p>	N/A
Information	W2.1.1 – 2.1.2	Construction	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
	L3.1.1 – 3.3.1	<p>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. The compliance document shall contain certification that all works have been undertaken that all works have been undertaken in accordance with the works approval and is required to be authorised by a representative of the occupier. These conditions allow for verification 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.</p> <p>Operation Condition 3.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years which assists DER in regulating the conditions of this licence.</p> <p>Condition 3.1.2 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR). This condition assists DER in regulating the occupier's compliance with licence conditions and allows and opportunity for DER to review the occupier's environmental performance.</p> <p>Condition 3.1.3 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. This condition is required as per the risk assessments conducted above for nuisance emissions. DER will review these complaints as reported in the Annual Environmental Report (AER) and will consider whether a reassessment of any regulatory controls is required to address any complaints.</p> <p>Condition 3.2.1 requires the licensee to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition 3.1.3. The AER is also required to provide results for the monitoring of inputs/output, monitoring of asbestos content of recycled products and a summary of malfunction of pollution</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>control equipment or any environmental incidents. DER reviews all of the data provided in the AER to assess compliance with the licence conditions and to monitor the environmental impacts from the premises.</p> <p>Condition 3.3.1 requires the licensee to notify the CEO if there is a breach of any licence limit (i.e. processing limits). The notifications required under this condition give DER appropriate notice of any environmental impacts at the premises so that DER can determine if any further action is required to address the incident.</p>	
Licence Duration	N/A	<p>The construction of the premises is expected to be complete within three to four months. The standard duration of three years will be applied to the works approval.</p> <p>The premises has planning approval from the City of Wanneroo that expires on 2 December 2020. It is recommended that this licence be issued for a period of four years to coincide with the planning approval period.</p>	Department of Environment Regulation Guidance Statement, Licence Duration, November 2014 (revised May 2015).



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
25/01/2016	Application advertised in West Australian (or other relevant newspaper)	No comments received.	N/A
25/01/2016	Application referred to interested parties listed - City of Wanneroo	The City of Wanneroo provided the following comments on 9 February 2016: <ul style="list-style-type: none">• The City issue a development approval dated 2 December 2015 for 190 Flynn Drive, Neerabup for the registered owner Alvito Pty Ltd.• The approval included conditions concerning dust and sand drift	N/A
29/03/2016	Proponent sent a copy of draft instrument	The proponent provided the following comments on 15 April 2016: <ul style="list-style-type: none">• Executive summary design capacity amended from 70,000 tonnes per annum to 300,000 tonnes per annum.• Description of wastes to be accepted amended.	<ul style="list-style-type: none">• This was an administrative error and has been rectified.• This has been amended as per the application.



6 Risk Assessment

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

Table 1: Emissions Risk Matrix

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