



# Licence

## *Environmental Protection Act 1986, Part V*

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**Licensee:**      **Eco Resources Pty Ltd**

**Licence:**      **L8757/2013/1**

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**Registered office:**      Eco Resources Pty Ltd  
Suite 18, 7 The Esplanade  
MOUNT PLEASANT WA 6153

**ACN**                              148 991 315

**Premises Address:**      Eco Resources Recycling Transfer Station  
Postans Road  
HOPE VALLEY WA 6165  
Being Part of Lots 571 and 572 on Plan 3475 as depicted in Schedule 1

**Issue date:**                      Tuesday, 16 July 2013

**Commencement date:**      Wednesday, 17 July 2013

**Expiry date:**                      Monday, 16 July 2018

**Prescribed Premises Category**

Schedule 1 of the Environmental Protection Regulations 1987

Category number	Category description	Category production or design capacity	Premises production or design capacity
62	Solid waste depot – premises on which waste is stored or sorted pending final disposal or re-use	500 tonnes or more per year	330 000 tonnes per annual period
57	Used tyre storage (general) – premises (other than premises within category 56) on which used tyres are stored	100 tyres or more	200 tyres stored at any one time
13	Crushing of building material: premises on which waste building or demolition (for example, bricks, stones or concrete) is crushed or cleaned.	1000 tonnes or more per year	52 000 tonnes per annual period



**Conditions of Licence**

Subject to the conditions of licence set out in the attached pages.

Date signed: 28 April 2015

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Caron Goodbourn

A/Manager Licensing – Industry Regulation (Waste Industries)

Officer delegated under Section 20  
of the *Environmental Protection Act 1986*



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## Introduction

This Introduction is not part of the Licence conditions.

### DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

### Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. These can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

### **Licence Fees**

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non-payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

### **Ministerial conditions**

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

### **Premises description and Licence summary**

Eco Resources Pty Ltd (Eco Resources) is a local Western Australian owned and operated waste management business that has been operating since 2011. Eco Resources lease Lots 571 and 572 on Postans Road, Hope Valley from Stoneridge Quarries.

The Eco Resources Hope Valley Premises (the Premises) is located within an area zoned 'Rural' under the Metropolitan Regional Scheme. The local area is zoned as 'Long Swamp Industrial area' and is part of the Latitude 32 Hope Valley Wattleup Redevelopment Plan. The Premises is located amongst other industrial Premises. A limestone quarry is located immediately West of the Premises and Alcoa's residue disposal areas are approximately 500m south east of the Premises. The nearest residences are located approximately 530m east of the Premises on Ashley Road, and approximately 750m north east of the Premises on Sayer Road. A building which was previously a residence, located 150m to the east of the Premises, is now an office for Ricochet Transport.

The Premises receives construction waste from a number of sources including skip bin companies, earth moving companies, landscapers and builders. Eco Resources provides an alternative to landfill by providing a waste facility where mixed loads of inert waste can be accepted and then sorted, sized and processed for recycling or disposal. On arrival waste is visually inspected by staff to ensure that the waste may be accepted at the Premises. Once inspected, waste is tipped into the tip off bay where further visual inspection is undertaken. Any waste found to not be acceptable as the Premises is reloaded and removed from the Premises by the driver who delivered the material. Acceptable loads are then sorted and separated, with recyclable materials segregated and stored in skip bins prior to transfer off site to an appropriate recycling facility. A baler is used onsite to bale paper, cardboard and plastic. Clean sand is screened out of the mixed waste stream for recovery, and the remainder of the waste is fed through a picking station for hand sorting. Following sorting, any waste unable to be recycled due to size/quality will be shredded to reduce the size of the material by up to 70%. Green waste is also shredded for sale as mulch. Concrete and bricks are crushed after passing through the picking station. The Premises also stores virgin sand (which is transported from the Licensee's sand quarry) for pickup and resale. The licensee implements an Asbestos Management Plan (AMP) which includes recycled sand and road based product testing for asbestos content.

The Premises may also accept and store up to 200 tyres at any one time. The tyres will be dropped off at the site and reloaded and transported offsite within the same day. However, there is the potential that the load of tyres will need to be stored for up to 48 hours as a contingency if there are any delays in the transport offsite.

The following equipment is used within the Premises;

- a picking station, screen and air density separator which operate simultaneously
- a low speed diesel TANA shredder
- a STRIKER JQ1175 crusher
- a baler (bales 1m x 1m)
- three front end loaders



- four excavators
- skip bins for storage
- vehicles with semi-trailers and road-train setups

The Premises is covered with a hardstand of 100mm of compacted recycled road base (over existing soils). There is a concrete hardstand tip off bay (50m long and 10m wide) and associated plastic lined sump (15m long, 2m wide and 1m deep). The Premises has been extended with a new eastern section, which is used for the storage of mulched and un-mulched green waste, crushed concrete/brick and various types of virgin sand and the operation of the crusher and shredder. Stormwater runoff within the eastern section of the Premises will collect in an unlined sump (8m long, 5m wide and 3m deep) which has also been constructed with a 100mm layer of compacted recycled road base. The runoff from the hardstand area in the western section of the Premises (excluding the tip off bay) is captured within the landscaped garden area on the southern boundary of the Premises.

There is the potential for dust emissions from the Premises. Sprinklers are used for dust suppression along the drive way and entry roads, at the tip off bay, on the open hopper area of the screen, on the hopper area of the shredder and above waste and virgin sand stockpiles. The crusher has an in built water suppression system. A hose is used to douse trucks during unloading at the tip off bay. Daily sweeping of the trafficable areas is undertaken to reduce the amount of built up sand/debris. A water cart is also available for use within the Premises when needed. A wheel wash is utilised for vehicles to wash down their tyres prior to exiting the Premises to prevent dust and sand build up on local roadways from the Premises.

There is also the potential for noise emissions from the Premises. A 7m high noise bund is located along the eastern perimeter of the Premises. The crusher operates within the eastern area of the premises, for up to 15 hours per week. It is positioned alongside the stockpile of crushed material to the south and a stockpile of uncrushed material to the east, which provides some additional noise buffering. The mobile shredder may be operated within the eastern section of the premises when shredding green waste (up to 5 hours per week), or (for the majority of the time) within the far western end of the premises shredding any other wastes. At the western end of the premises, 5 metre high stockpiles of sorted waste to the northeast and sea containers arranged in an L shape near the entry to the premises also assist with the noise buffering from the shredder. When the shredder is located in the western end of the premises near the crusher, they will not be operated simultaneously.

This licence amendment is the result of an application by the Licensee to;

- increase the premises boundary to include an additional section of Lots 571 and 572 on Plan 3475 (increasing the Premises area from approximately 16 000m<sup>2</sup> to 29 000m<sup>2</sup>);
- the addition of Category 13: Crushing of building material to the Licence for the purpose of crushing up to 1000 tonnes per week of concrete/brick;
- increase the storage of un-mulched green waste and mulched green waste from 40m<sup>3</sup> and 20m<sup>3</sup> respectively to 200m<sup>3</sup> each.

The licences and works approvals issued for the Premises since 27/02/2013 are:

Instrument Log		
Instrument	Issued	Description
W5365/2013/1	27/02/2013	New premises
L8757/2013/1	10/07/2013	New premises licence
L8757/2013/1	11/11/2015	Licence amendment - production/design capacity increase and increase in tyre storage
L8757/2013/1	28/04/2016	Licence amendment – change to premises boundary, increase in green waste storage and addition of Category 13: Crushing of building material.

### Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall



nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

## END OF INTRODUCTION

# Licence Conditions

## 1 General

### 1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 In the Licence, unless the contrary intention appears:

**'the Act'** means the *Environmental Protection Act 1986*;

**'annual period'** means the period from 1 July until 30 June 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;

**'asbestos containing material'** has the meaning defined in the Guidelines for Assessment, Remediation and Management of Asbestos Contaminated Sites, Western Australia, (DOH, 2009);

**'bund wall'** means the solid wall along the eastern boundary of the premises which is seven metres in height and labelled "BUND 7m HIGH" on the Site Plan in Schedule 1;

**'clean fill'** means material that will have no harmful effect on the environment and consists of rocks or soil, or a combination of rocks and soil, which is extracted in a raw, unaltered form and which has not previously been used, consumed or subject to processing of any kind;

**'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](mailto:info@der.wa.gov.au)

**'combustible material'** means any material that is capable of readily catching fire if heated or otherwise exposed to an external flame and which is further capable of burning easily;

**'construction and demolition waste'** has the meaning defined in Landfill Definitions;

**'DER Asbestos Guidelines'** means the document titled "Guidelines for managing asbestos at construction and demolition waste recycling facilities"

**'green waste'** means biodegradable waste comprising plants and their component parts such as flower cuttings, hedge trimmings, branches, grass, leaves, plants, seeds, shrub and tree loppings, tree trunks, tree stumps and similar materials and includes any mixture of those materials;

**'Inert Waste Type 1'** has the meaning defined in Landfill Definitions;



**'Inert Waste Type 2'** has the meaning defined in Landfill Definitions;

**'Landfill Definitions'** means the document titled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer of the Department of Environment as amended from time to time;

**'Licence'** means this Licence numbered L8757/2013/1 and issued under the *Environmental Protection Act 1986*;

**'Licensee'** means the person or organisation named as Licensee on page 1 of the Licence;

**'mulched green waste'** means green waste shredded by a mechanical process into smaller pieces;

**'Non-Combustible Material'** means material that is not combustible material;

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

**'Special Waste Type 1'** has the meaning defined in Landfill Definitions;

**'Tip Off Bay'** means the area bordered by red in the Site Layout Map (Plan) in Schedule 1 of this Licence; and

**'waste'** has the meaning defined in the *Environmental Protection Act 1986*.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

## 1.2 Premises operation

1.2.1 The Licensee shall only accept waste on to the Premises if:

- (a) it is of a type listed in Table 1.2.1;
- (b) the quantity accepted is below any quantity limit listed in Table 1.2.1;
- (c) it meets any specification listed in Table 1.2.1.

**Table 1.2.1: Waste acceptance**

Waste	Quantity Limit	Specification
Inert Waste Type 1 (excluding Special Waste Type 1)	330, 000 tonnes per annual period	Waste containing visible asbestos or asbestos containing material shall not be accepted at the Premises.
Inert Waste Type 2 (plastics and tyres only)		
Green waste		
Cardboard and paper		
Scrap metal		

1.2.2 The Licensee shall ensure that where waste does not meet the waste acceptance criteria set out in condition 1.2.1 it is removed from the Premises by the delivery vehicle or, where that is not possible;

- (a) stored in a segregated storage area or container and removed to an appropriately authorised facility as soon as practicable; and





- (b) where waste does not meet the waste acceptance criteria due to asbestos content it, is wrapped or otherwise contained in a manner that prevents asbestos fibres entering the atmosphere and is clearly labelled.
- 1.2.3 The Licensee must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.
- 1.2.4 The Licensee must include a 'no asbestos' clause in all contracts with material sources.
- 1.2.5 The Licensee must maintain a clearly visible sign saying 'No Asbestos' at the entry to the Premises.
- 1.2.6 The Licensee must only accept waste onto the Premises for storage, sorting or crushing that is Inert Waste Type 1 with a signed declaration from the supplier of the source material with each delivery that warrants that the load does not contain any asbestos or ACM.
- 1.2.7 The Licensee must visually inspect all loads of waste for visible asbestos or asbestos containing material;
- (a) prior to and during unloading at the Premises; and
  - (b) at all stages of the storage, sorting and crushing process.
- 1.2.8 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the process(es) set out in Table 1.2.2 and in accordance with any process limits described in that Table.

Table 1.2.2: Waste processing		
Waste type	Process	Process limits
Inert Waste Type 1	Receipt, handling, sorting (mechanical and hand), baling, shredding, crushing and/or storage prior to removal off site	(a) Waste shall only be accepted at the Premises at the Tip Off Bay prior to sorting and separation;
Inert Waste Type 2		(b) Loads shall be wet down during unloading at the tip off bay;
Green waste		(c) Loads should be thoroughly spread out and checked for any unauthorised contamination prior acceptance and further sorting and processing;
Cardboard and paper		(d) Only cardboard, paper or plastic shall be baled; and
Scrap metal		(e) The shredder and crusher shall not be operated simultaneously when the shredder is working in the eastern location of the Premises indicated (by the label "shredder") on the Site Plan in Schedule 1.
		<b>Crushing</b> (f) Only concrete and brick may be crushed; and (g) The crusher may only operate: <ul style="list-style-type: none"> <li>(i) for 15 hours per week between the hours of 7:00am to 5:00pm Monday to Friday and 7:00am to 1:00pm Saturday; and</li> <li>(ii) when the plants inbuilt dust suppression system is operating; and</li> <li>(iii) in the location indicated in the Site Plan is Schedule 1.</li> </ul>
		<b>Shredding</b> (h) Waste unable to be readily sorted or recycled due to size/quality may be shredded prior to being sorted through the picking station; (i) Shredding shall only occur when the shredder's inbuilt dust suppression system is operating; and (j) The shredder must only operate in the locations indicated in the Site Plan in Schedule 1 (by the label





		<p>“shredder”). The shredder shall only operate at the eastern location when shredding green waste. When operating in the western location, the shredder must be positioned either adjacent to sea containers to the east and south of the shredder, or adjacent to the incoming waste stockpile to the east of the shredder to help mitigate noise emissions.</p> <p><b>Storage</b></p> <ul style="list-style-type: none"><li>(k) Wastes (excluding Inert Waste Type 1, green waste and tyres) must be stored within an enclosed bin.</li><li>(l) Crushed material shall only be stored within an area provided with dust control sprinkler systems.</li><li>(m) Not more than 200m<sup>3</sup> of un-mulched green waste is to be stored at the Premises at any one time.</li><li>(n) Not more than 200m<sup>3</sup> of mulched green waste is to be stored at the Premises at any one time.</li><li>(o) Unprocessed green waste shall be removed from the premises within 4 weeks of being received at the Premises.</li><li>(p) All mulched green waste shall be removed from the Premises within one week of being shredded, or before the close of business every Friday, whichever occurs first.</li><li>(q) Stockpiles of received or processed waste/material on the Premises shall not exceed 5 metres in height.</li><li>(r) Not more than 200 tyres to be stored on the Premises at any one time.</li><li>(s) Used tyres shall be;<ul style="list-style-type: none"><li>(i) stored at least 6 metres from any combustible material, wall, building or fence;</li><li>(ii) stored stacked on their sides or if stored upright on their treads, are baled together with a securing device made from non-combustible material; and</li><li>(iii) removed from the Premises within 48 hours of being received at the Premises.</li></ul></li></ul>
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1.2.9 The Licensee shall implement the following security measures at the site:

- (a) erect and maintain suitable fencing to prevent unauthorised access to the site;
- (b) ensure that any entrance gates to the premises are securely locked when the premises are unattended; and
- (c) undertake regular inspections of all security measures and repair damage as soon as practicable.

1.2.10 The Licensee shall ensure that no waste is burnt on the premises.

1.2.11 The Licensee shall take all reasonable and practical measures to ensure that no windblown litter escapes from the Premises.

1.2.12 The Licensee shall direct all shredded waste to a licensed disposal facility at least once in each seven day period.

1.2.13 The Licensee shall not bury any waste at the Premises.

1.2.14 The Licensee shall ensure that the asbestos content of any recycled output originating from construction and demolition waste does not exceed the contamination limits specified in Table 1.2.3.



**Table 1.2.3: Recycled output contamination limits**

Output	Parameter	Limit
Recycled drainage rock	Asbestos (in any form)	0.001%w/w
Recycled sand		
Recycled road base		

1.2.15 The Licensee shall ensure that recycled outputs originating from construction and demolition waste are sampled and tested in accordance with Table 1.2.4.

**Table 1.2.4: Recycled output sampling and testing**

Output	Parameter	Limit	Method
Recycled drainage rock	Asbestos (in any form)	0.001%w/w	In accordance with the DER Asbestos Guidelines and at a minimum sampling rate of 40 locations per 4000 tonnes or 14 samples per 1000m <sup>3</sup> of product.
Recycled sand			
Recycled road base			

1.2.16 The Licensee shall ensure that clean fill that is temporarily stored on the premises:

- is only stored within an area provided with dust control sprinkler systems; and
- is stockpiled at a height that either:
  - does not exceed the height of the bund wall, where the stockpile is located immediately adjacent to the bund wall; or
  - does not exceed 5 metres.

## 2 Monitoring

### 2.1 Monitoring of inputs and outputs

2.1.1 The Licensee shall undertake the monitoring specified in Table 2.1.1.

**Table 2.1.1 Monitoring of inputs and outputs**

Input/Output	Parameter	Units	Averaging Period	Frequency
Waste Inputs	Inert Waste Type 1, Inert Waste Type 2, green waste, Cardboard and paper, Scrap metal	Tonnes (or m <sup>3</sup> where no weighbridge is present)	N/A	Each load arriving at the Premises
Waste Outputs	All waste types as defined in the Landfill Definitions			Each load leaving or rejected from the Premises

## 3 Improvements

### 3.1 Improvement program

3.1.1 The Licensee shall complete the improvements in Table 3.1.1 by the date of completion in Table 3.1.1.

**Table 3.1.1: Improvement program**

Improvement reference	Improvement	Date of completion
IR1	The Licensee shall update the Asbestos Management Plan (AMP) for the Premises such that the plan includes;	1 July 2016



	<ul style="list-style-type: none"> <li>• Identification of each person's roles and responsibilities under the AMP; and</li> <li>• A sampling and analysis program; and</li> <li>• Details of staff training; and</li> <li>• Details of compliance and performance audits to be undertaken and periodic reviews of the AMP;</li> </ul> <p>that are consistent with the DER Asbestos Guidelines and the requirements of this Licence.</p>	
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## 4 Information

### 4.1 Records

4.1.1 All information and records required by the Licence shall:

- be legible;
- if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- except for records listed in 4.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- for those following records, be retained until the expiry of the Licence or any subsequent licence:
  - off-site environmental effects; or
  - matters which affect condition of the land or groundwater.

4.1.2 The Licensee shall complete an Annual Audit Compliance Report (AACR) indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.

4.1.3 The Licence shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

4.1.4 Where waste loads are rejected from the Premises due to the presence of asbestos or asbestos containing material, the Licensee shall record the details of the material source, material carrier, registration number of the vehicle and date of rejection.

### 4.2 Reporting

4.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 28 calendar days after of the end of the annual period. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

Table 4.2.1: Annual environmental report		
Condition or Table (if relevant)	Parameter	Format or Form <sup>1</sup>
-	Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the annual period and any action taken	None specified
1.2.15	Recycled output sampling and testing	None specified
2.1.1	Summary of inputs and outputs monitoring	None specified
3.1.2	Compliance	AACR
3.1.3	Complaints summary	None specified

Note 1: Forms are in Schedule 2





## Schedule 1: Maps

### Premises map

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



## Site Plan

The diagram below shows the site layout.

SUBSOIL IRRIGATION NOTE:

- 150m<sup>2</sup> OF SUBSOIL IRRIGATION SERVICING ATU DISPOSAL SYSTEM WATER
- 2x75m TRICKLE LINES TO RUN AT BASE OF BUND WALL ON EAST BOUNDARY SIDE
- 100mm THICK MULCH TOP COAT OVER LINES
- PLANTS TO BE PLANTED AT 1.5m SPACING: BANKSIA SCEPTRUM (LITTLEFORM) & GREVILLEA PREISSII (SEASPRAY)

NOTE HARDSTAND:

- AREA TO BE RECYCLED BITUMEN COMPACTED TO COUNCIL SPEC EXCEPT ENTRY AND EXIT DRIVEWAY TO BE DONE HOTMIX ASPHALT TO COUNCIL SPEC.

TRAFFICABLE AREA NOTE:

- SUBGRADE - FREE FROM VEGETATION AND COMPACTED
- 75mm LIMESTONE 150mm THICK COMPACTED (SUBBASE)
- 100mm THICK BASE COURSE ROCKBASE
- SEALING - 7mm SIZE AGGREGATE DENSE GRADED ASPHALT 30mm THICK

NON TRAFFICABLE AREA NOTE:

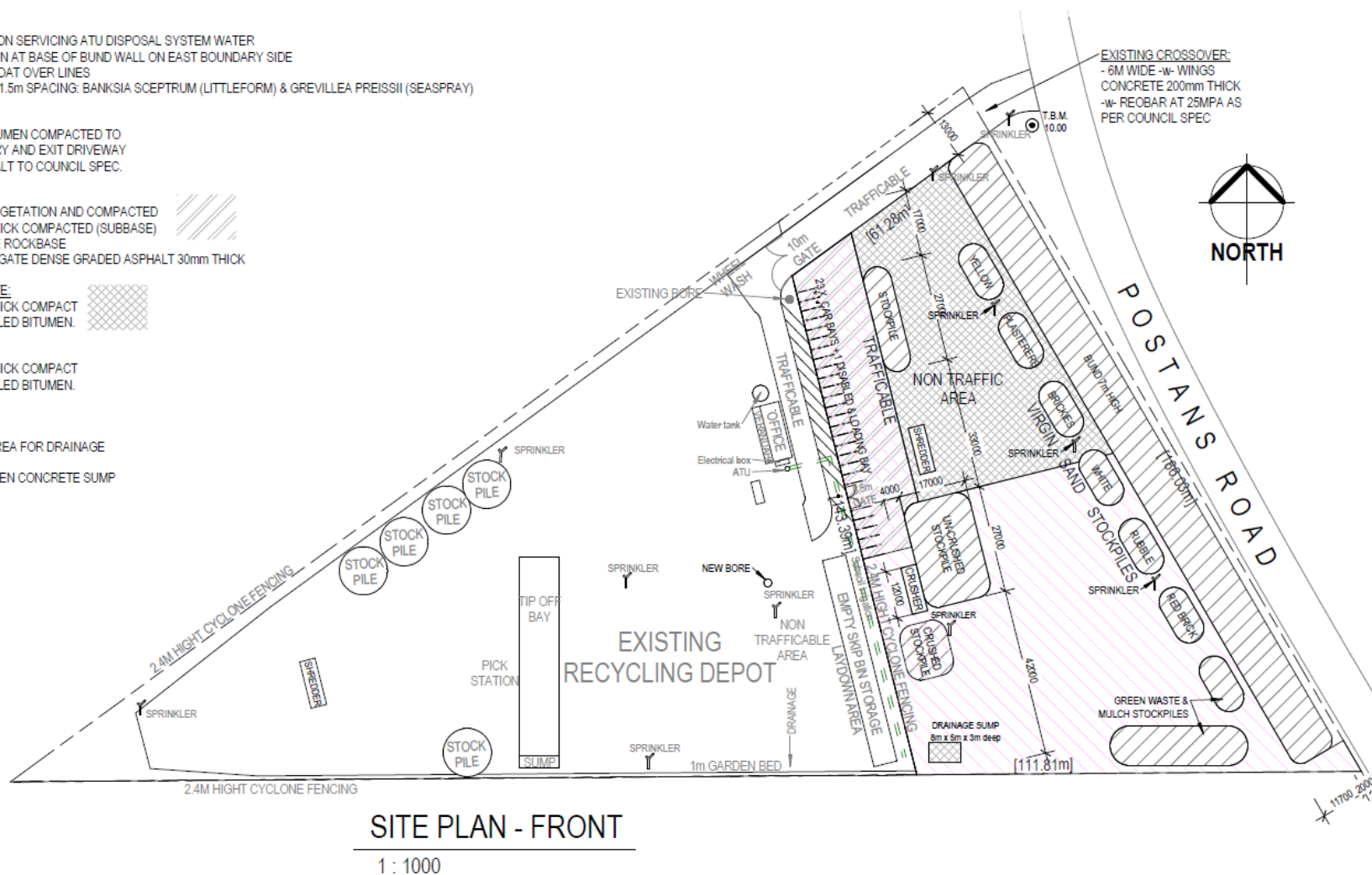
- 75mm LIMESTONE 150mm THICK COMPACT  
- 100mm COMPACTED RECYCLED BITUMEN.

LAYDOWN AREA NOTE:

- LAYDOWN/REBAR NOTE:**  
 - 75mm LIMESTONE 150mm THICK COMPACT  
 - 100mm COMPACTED RECYCLED BITUMEN.  
 - BASE COURSE ONLY

**NOTE:**

- 450 m<sup>2</sup> OPEN LANDSCAPE AREA FOR DRAINAGE OF HARDSTAND RUNOFF
- TIP OFF BAY RUNOFF TO OPEN CONCRETE SUMP





## Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

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### ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

#### SECTION A LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Trading as:	ABN:
Reporting period: _____ to _____	

#### STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



## SECTION B

### DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the non compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):	
g) Cause of non compliance:	
h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:	
i) Action taken or that will be taken to prevent recurrence of the non compliance:	

Each page must be initialised by the person(s) who signs Section C of this AACR

Initial:





## SECTION C

### SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

POSITION: \_\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

SEAL (if signing under seal)

SIGNATURE: \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

POSITION: \_\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:**     **Eco Resources Pty Ltd**

**Licence:**        **L8757/2013/1**

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**Registered office:**     Eco Resources Pty Ltd  
Suite 18, 7 The Esplanade  
MOUNT PLEASANT WA 6153

**ACN:**                 148 991 315

**Premises address:**     Eco Resources Recycling Transfer Station  
Postans Road  
HOPE VALLEY WA 6165  
Being Part of Lots 571 and 572 on Plan 3475 as depicted in Schedule 1

**Issue date:**             Tuesday, 16 July 2013

**Commencement date:** Wednesday, 17 July 2013

**Expiry date:**            Monday, 16 July 2018

### **Decision**

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

Decision Document prepared by:                             Tessa Smith  
Licensing Officer

Cassie Bell  
Licensing Officer

Decision Document authorised by:                             Caron Goodbourn  
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 type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	62	330 000 tonnes per annual period
	57	200 tyres at any one time
	13	52 000 tonnes per annum
Application verified	Date: 12/02/2016	
Application fee paid	Date: NA	
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		
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 checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Environmental Protection (Kwinana) (Atmospheric Wastes) Policy 1999		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

### 3 Executive summary of proposal and assessment

Eco Resources Pty Ltd (Eco Resources) is a local Western Australian owned and operated waste management business that has been operating since 2011. Eco Resources lease Lots 571 and 572 on Postans Road, Hope Valley from Stoneridge Quarries.

The Eco Resources Hope Valley Premises (the Premises) is located within an area zoned 'Rural' under the Metropolitan Regional Scheme. The local area is zoned as 'Long Swamp Industrial area' and is part of the Latitude 32 Hope Valley Wattleup Redevelopment Plan. The Premises is located amongst other industrial Premises. A limestone quarry is located immediately West of the Premises and Alcoa's residue disposal areas are approximately 500m south east of the Premises. The nearest residences are located approximately 530m east of the Premises on Ashley Road, and approximately 750m north east of the Premises on Sayer Road. A building which was previously a residence, located 150m to the east of the Premises, is now an office for Ricochet Transport. A small water body (which may be a dam within the neighbouring premises) is located approximately 300m west of the Premises and Long Swamp, a Conservation Category Wetland is located 1.5km south west of the Premises. The depth to groundwater in the area is expected to be approximately 19m below ground level.

The Premises receives construction waste from a number of sources including skip bin companies, earth moving companies, landscapers and builders. Eco Resources provides an alternative to landfill by providing a waste facility where mixed loads of inert waste can be accepted and then sorted, sized and processed for recycling or disposal. On arrival waste is visually inspected by staff to ensure that the waste may be accepted at the Premises. Once inspected, waste is tipped into the tip off bay where further visual inspection is undertaken. Any waste found to not be acceptable as the Premises is reloaded and removed from the Premises by the driver who delivered the material. Acceptable loads are then sorted and separated, with recyclable materials segregated and stored in skip bins prior to transfer off site to an appropriate recycling facility. A baler is used onsite to bale paper, cardboard and plastic. Clean sand is screened out of the mixed waste stream for recovery, and the remainder of the waste is fed through a picking station for hand sorting. Following sorting, any waste unable to be recycled due to size/quality will be shredded to reduce the size of the material by up to 70%. Green waste is also shredded for sale as mulch. Concrete and bricks are crushed after passing through the picking station. The Premises also stores virgin sand (which is transported from the Licensee's sand quarry) for pickup and resale. The licensee implements an Asbestos Management Plan (AMP) which includes recycled sand and road based product testing for asbestos content.



The Premises may also accept and store up to 200 tyres at any one time. The tyres will be dropped off at the site and reloaded and transported offsite within the same day. However, there is the potential that the load of tyres will need to be stored for up to 48 hours as a contingency if there are any delays in the transport offsite.

The following equipment is used within the Premises;

- a picking station, screen and air density separator which operate simultaneously
- a low speed diesel TANA shredder
- a STRIKER JQ1175 crusher
- a baler (bales 1m x 1m)
- three front end loaders
- four excavators
- skip bins for storage
- vehicles with semi-trailers and road-train setups

The Premises is covered with a hardstand of 100mm of compacted recycled road base (over existing soils). The entry/exist and parking areas are sealed with asphalt. There is a concrete hardstand tip off bay (50m long and 10m wide) and associated plastic lined sump (15m long, 2m wide and 1m deep). The Premises has been extended with a new eastern section, which is used for the storage of mulched and un-mulched green waste, crushed concrete/brick and various types of virgin sand and the operation of the crusher and shredder. Stormwater runoff within the eastern section of the Premises will collect in an unlined sump (8m long, 5m wide and 3m deep) which has also been constructed with a 100mm layer of compacted recycled road base. The runoff from the hardstand area in the western section of the Premises (excluding the tip off bay) is captured within the landscaped garden area on the southern boundary of the Premises.

There is the potential for dust emissions from the Premises. Sprinklers are used for dust suppression along the drive way and entry roads, at the tip off bay, on the open hopper area of the screen, on the hopper area of the shredder and above waste and virgin sand stockpiles. The crusher has an in built water suppression system. A hose is used to douse trucks during unloading at the tip off bay. Daily sweeping of the trafficable areas is undertaken to reduce the amount of built up sand/debris. A water cart is also available for use within the Premises when needed. A wheel wash is utilised for vehicles to wash down their tyres prior to exiting the Premises to prevent dust and sand build up on local roadways from the Premises.

There is also the potential for noise emissions from the Premises. A 7m high noise bund is located along the eastern perimeter of the Premises. The crusher operates within the eastern area of the premises, for up to 15 hours per week. It is positioned alongside the stockpile of crushed material to the south and a stockpile of uncrushed material to the east, which provides some additional noise buffering. The mobile shredder may be operated within the eastern section of the premises when shredding green waste (up to 5 hours per week), or (for the majority of the time) within the far western end of the premises when shredding any other wastes. At the western end of the premises, 5 metre high stockpiles of sorted waste to the northeast and sea containers arranged in an L shape near the entry to the premises also assist with the noise buffering from the shredder. When the shredder is located in the western end of the premises near the crusher, they will not be operated simultaneously.

This licence amendment is the result of an application by the Licensee received by DER on 15 December 2015 to;

- increase the premises boundary to include an additional section of Lots 571 and 572 on Plan 3475 which the Licensee has now leased and in which a hardstand of crushed road based has been laid. This area now forms the eastern section of the premises, separated from the western section by fencing. This will increase the Premises area from approximately 16 000m<sup>2</sup> to 29 000m<sup>2</sup>;



- the addition of Category 13: Crushing of building material to the Licence for the purpose of crushing up to 1000 tonnes per week of concrete/brick;
- increase the storage of un-mulched green waste and mulched green waste from 40m<sup>3</sup> and 20m<sup>3</sup> respectively to 200m<sup>3</sup> each.

The justification for these amendments is included within the Decision Table below. The proposed changes to the operations may increase risks associated with contaminated stormwater, fugitive dust and noise emissions. These emissions are assessed in the Decision Table below.

Planning approval did not include the crushing/shredding activity at the time the amendment application was submitted to DER. An application was subsequently submitted to city of Kwinana. On 27 April 2016, the City of Kwinana forwarded a copy of the Planning Approval granted for the premises (dated 19 April 2016).



## 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
Premises prescribed category	Prescribed premises category table on first page of Licence	Category 13: Crushing of building material has been added to the Prescribed Premises Category table as the Licensee proposes to begin a new activity of crushing concrete and brick rubble at a maximum rate of 1000 tonnes per week (crusher operating 15 hours per week). A premises production or design capacity of 52 000 tonnes per annual period has been included in accordance with the proposed processing rate. The production capacity for the crushing activity will be restricted to the proposed 15 hours per week by condition 1.2.3 which specifies the hours in which the crusher may operate.	Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015
Interpretation	L1.1.2	<p>The following amendments have been made to the definitions within section 1.1.2;</p> <ul style="list-style-type: none"><li>• The definition for 'annual' was corrected to 'annual period'.</li><li>• The definitions for 'AS/NZS 5667.10' and 'NATA' have been removed as these terms are not used within the Licence.</li><li>• The defined term 'garden waste or green waste' has been amended to 'green waste' and the defined term 'mulch or mulched' has been amended to 'mulched green waste', as throughout the licence green waste will now either be referred to as mulched green waste and un-mulched green waste. There is no need to refer to garden waste as this is not different to green waste.</li><li>• A definition for 'clean fill' has been added as virgin sand from the Licensees quarry is stored on the premises and is now subject to condition 1.2.16 (see Premises operation section for further detail).</li><li>• A definition for 'construction and demolition waste' has been added to the Licence as this term is used within conditions 1.2.14 and 1.2.15.</li><li>• A definition for 'DER Asbestos Guidelines' has been added as the term is</li></ul>	





DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		used within condition 3.1.1.	
General conditions	N/A	<p>Condition 1.1.5 of the existing licence has been removed as it is not valid, enforceable or risk based. It is an explanatory statement.</p> <p>Conditions 1.2.1 – 1.2.3 of the existing licence have been removed, as these conditions are considered redundant. They are not enforceable as they are not sufficiently clear or certain. The risk of contaminated stormwater emissions have been addressed in the emissions to land section below.</p>	
Premises operation	L1.2.1 L1.2.8	<p>Several specifications listed below included within condition 1.3.1 of the existing Licence (now 1.2.1) have been moved into condition 1.2.8 (waste processing) as these requirements are considered more applicable to waste processing than waste acceptance;</p> <ul style="list-style-type: none"> <li>waste shall only be accepted at the tip off bay;</li> <li>quantity restrictions for storage of un-mulched and mulched green waste;</li> <li>quantity restriction for tyre storage.</li> </ul> <p>Condition 1.2.8 (1.3.3 of the existing Licence) has been amended to incorporate the Licensees requested increase in the storage of un-mulched green waste and mulched green waste from 40m<sup>3</sup> and 20m<sup>3</sup> respectively to 200m<sup>3</sup> each (400m<sup>3</sup> combined). The term 'garden waste or green waste' has been amended to 'un-mulched green waste' in accordance with the removal of the term garden waste from the definitions within the Licence, and to make it clear that this relates to un-mulched green waste, not green waste in general (which could be mulched or un-mulched).</p> <p>The un-mulched and mulched green waste will be stored within the new area of the premises, which is to the east of the existing premises area. The additional area of Lots 571 and 572 to be included within the premises boundary is</p>	Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 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>approximately 13 000m<sup>2</sup> in area (approximately 6000m<sup>2</sup> of which is useable area). Overall the premises will increase in size from approximately 16 000m<sup>2</sup> to 29 000m<sup>2</sup> in total area. The additional area will be more than sufficient for the storage of up to 400m<sup>3</sup> of green waste (mulched and un-mulched combined).</p> <p>The risk of stormwater contamination associated with an increased storage of green waste has been addressed in the Emissions to Land section below.</p> <p>The below amendments have also been applied to Condition 1.2.8 (1.3.3 of the existing Licence);</p> <ul style="list-style-type: none"><li>• The process wording within the second column of Table 1.2.2 has been changed to add 'crushing' and replace 'disposal or recycling off site to a licensed premises' with 'removal off site', as some of the materials are sold rather than disposed or recycled offsite. It is considered unnecessary to state any process that occurs after the removal of the material from the site.</li><li>• Requirements for the unloading of waste, and the operation of the crusher and shredder which are justified within the fugitive emission and noise sections of the Decision Table.</li><li>• A requirement for the storage of wastes other (than Inert Waste Type 1, green waste and tyres) which is justified within the emissions to land section of the Decision Table.</li><li>• A requirement for the storage of crushed material in areas that are provided with dust control sprinklers, which is justified within the fugitive emissions section of the Decision Table.</li><li>•</li></ul>	
Emissions to land	L1.2.8	As condition 1.2.3 of the previous licence has been removed as mentioned in the general conditions section above, the stormwater management for the entire Premises has been re-assessed below.	Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 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><u>Emission Description</u></p> <p><i>Emission:</i> Stormwater within the Premises may become contaminated due to contact with stored green waste (mulched and un-mulched) and any non-conforming waste (including asbestos waste) unloaded at the tip off bay within the premises. Waste unloaded at the tip off bay, stockpiled crushed product and sand may also contribute to the sediment load within the stormwater runoff within the Premises.</p> <p><i>Impact:</i> contaminated stormwater may contribute to contaminant loads within surface water bodies, soils or groundwater. The depth to groundwater in the area is expected to be approximately 19m below ground level. The neighbouring limestone quarry indicates that the soils are expected to be limestone sands however this has not been verified. A small water body (which may be a dam within the neighbouring premises) is located approximately 300 east, and Long Swamp, a Conservation Category Wetland is located approximately 1.5km south west.</p> <p><i>Controls:</i> The Premises is covered with a hardstand of 100mm of compacted recycled road base (over existing soils). Stormwater runoff within the eastern section of the Premises (where mulched and un-mulched green waste, crushed material and virgin sand is stored) will collect in an unlined sump which has also been constructed with a 100mm layer of compacted recycled road base. The runoff from the hardstand area in the western section of the Premises (excluding the tip off bay) is captured within the landscaped garden area on the southern boundary of the Premises. The tip off bay where wastes are initially unloaded is a concrete hardstand from which runoff is collected in a plastic lined sump. The water within the sump either evaporates or is removed by a controlled waste carrier. Recyclable materials are stored within skip bins after being sorted and prior to removal from the Premises. Tyres may be stored on the ground but may only be stored for up to 48 hours within the Premises.</p> <p><u>Risk Assessment</u></p> <p><i>Consequence:</i> Minor</p> <p><i>Likelihood:</i> Unlikely</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: Moderate</i></p> <p><u>Regulatory Controls</u> Condition 1.2.3 of the existing licence has been removed as mentioned in the general conditions section above.</p> <p>Existing condition 1.2.8 (previously 1.3.3) within the Licence requires the removal of unprocessed green waste within 4 weeks of being received at the premises, and the removal of mulched green waste from the premises within one week of being mulched, or before close of business on Friday.</p> <p>The existing requirements within Condition 1.2.8 (previously 1.3.3) also require the removal of tyres within 48 hours of being received at the Premises.</p> <p>An existing requirement within condition 1.2.8 (previously 1.3.3), for the storage of each waste type separately in an enclosed bin following shredding, has been amended for clarity to require all wastes (excluding Inert Waste Type 1, green waste and tyres) to be stored within an enclosed bin.</p> <p><u>Residual risk</u> <i>Consequence: Minor</i> <i>Likelihood: Rare</i> <i>Risk Rating: Low</i></p>	
<b>Fugitive emissions</b>	L1.2.1 – 1.2.8 L1.2.14 L1.2.15 L1.2.16	See appendix A for the risk assessments completed for fugitive emissions.	<p>Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015</p> <p>Guidelines for managing asbestos at</p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
			construction and demolition waste recycling facilities, DEC 2012
Odour	L1.2.8	<p><u>Emission Description</u> <i>Emission:</i> Odour emissions from increased volumes of and mulched and un-mulched green waste storage. <i>Impact:</i> Nuisance to staff on nearby industrial premises or nearby residents. The nearest residences are located approximately 530m east and approximately 750m north east of the Premises. DER draft Guidance Statement on Separation distances indicates a separation distance of 1000m for Category 57 and 200m for Category 62 operations. The separation distance for Category 62 is achieved but it is not achieved for category 57. <i>Controls:</i> The premises is operated to minimise the storage and processing times for green waste and garden waste.</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> Condition 1.2.8 (Table 1.2.2) sets maximum storage and processing times for unprocessed garden waste and green waste. The assessment indicates that these conditions are sufficient to mitigate odour emissions.</p> <p><u>Residual risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Noise	L1.2.8	<p><u>Emission Description</u>  <i>Emission:</i> Noise emissions from the operation of the crusher and shredder and front end loaders/excavators within the new eastern section of the Premises.  <i>Impact:</i> Noise can cause a nuisance for people on nearby properties and may disturb native fauna. The Premises is located within an industrial area, with a limestone quarry located immediately West of the Premises. The nearest residences are located approximately 530m east and 750m north east of the Premises. A building located 150m to the east of the Premises is now an office for Ricochet Transport. Noise level measurements have been carried out by Herring Storer Acoustics in December 2015 to assess the noise levels associated with the operation of the crusher in its proposed location. The measurements undertaken did not show an exceedance of the noise levels within the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations).  <i>Controls:</i> A 7m high noise bund is located along the eastern perimeter of the Premises. The crusher is positioned alongside the stockpile of crushed material to the south and a stockpile of uncrushed material to the east, which provides some additional noise buffering. The crusher will operate up to 15 hours per week. The mobile shredder will be operated within the eastern section of the premises for up to 5 hours per week when shredding green waste only (will be located within the far western end of the premises when shredding any other wastes, behind a large (5m high) stockpile of unsorted waste). The Licensee has stated that the shredder is quieter during operation than the crusher, and that the crusher and shredder will not be operated simultaneously when they are co-located in the eastern part of the premises.</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></p>	<p>Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015</p> <p>Email Transmittal; Lot 572 Postans Road, Hope Valley Acoustic Assessment, Herring Storer Acoustics, 15 December 2015.</p> <p><i>Environmental Protection (Noise) Regulations 1997</i></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>The Herring Storer Acoustics email transmittal regarding the noise level measurements undertaken in December 2015 was referred to DER's Noise Regulation Functional Area for comment. Comment was received that as long as the operation is limited to 7:00am – 7:00pm Monday to Saturday (excluding public holidays), noise from the site should be able to comply with the Noise Regulations.</p> <p>Requirements have been included within condition 1.2.8 (Table 1.2.2) of the Licence which specify that the crusher and shredder shall not be operated simultaneously when they are co-located in the eastern part of the premises, that the crusher shall only be operated for a maximum of 15 hours per week during the premises operating hours, and that the shredder shall only operate in the eastern section of the premises when shredding green waste.</p> <p>The existing requirement within condition 1.2.8 (previously 1.3.3) the Licence for the shredder to be located alongside two sea containers for noise buffering when located within the western section of the Premises has been amended in light of comments received from the Licensee that noise attenuation is now achieved by the positioning of the shredder behind (to the west of) the stockpile of waste waiting to be sorted, which is ordinarily up to 5 metres in height and therefore considerably more effective than the previous 2.4 metre sea container arrangement and therefore a reduction in risk to the nearest sensitive receptor (east of the premises).</p> <p><u>Residual risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	
Improvements	L3.1.1	An improvement requirement has been added to the Licence requiring that the AMP for the Premises is updated such that the plan addresses roles and responsibilities, the sampling and analysis program, staff training and compliance and performance audits. These items have not been addressed within the current	Guidelines for managing asbestos at construction and demolition waste





DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		AMP, with the exception of sampling and analysis. However, a higher sampling frequency is being required by condition 1.2.15 than is currently detailed within the AMP. The addition of the improvement requirement is also discussed within the fugitive emissions risk assessment within Appendix A.	recycling facilities, DEC 2012  Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015
Information	L4.1.4 L4.2.1	<p>Condition 4.1.2 of the existing licence has been removed, as this condition is not enforceable because the requirements for compliance are not clear.</p> <p>Condition 4.1.4 has been added to the Licence specifying that where a waste load is rejected from the Premises due to the presence of asbestos or asbestos contaminated material, the Licensee shall record specific details that are in line with the DER's Guidelines for Managing Asbestos at construction and demolition waste recycling facilities (DER's Asbestos Guidelines).</p> <p>A requirement to report a summary of the monitoring of inputs/output has been added to Table 4.2.1. It is noted that this should have been included in the Licence previously. A requirement to report the results of the recycled products sampling and testing for asbestos content has also been added to Table 4.2.1. DER reviews all of the data provided in the AER to assess compliance with the licence conditions.</p>	Guidelines for managing asbestos at construction and demolition waste recycling facilities, DEC 2012
Schedule 1	N/A	<p>The premises map has been updated to reflect the new premises boundary.</p> <p>The site layout plan has been updated to reflect the latest proposed site layout.</p>	Eco Resources Pty Ltd Application to amend a licence (Form P4) received by DER 15 December 2015
Licence Duration	NA	<p>There has been no change to the licence duration. It is noted that the Licensee has a lease agreement in place for the land which has a limited lifespan.</p> <p>It may not be appropriate to extend the duration of this licence to a longer term</p>	Guidance Statement: Licence duration (DER, May 2015)



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		arrangement, in accordance with DER's Guidance Statement on Licence Duration, until such time as the Licensee has secured ownership of the land.	



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
22/02/2016	Application referred to City of Kwinana	No comment received.	N/A
23/03/2016	Proponent sent a copy of draft instrument  Comment received via email on 29/03/2016.	<b>Page 5: end of paragraph 3</b> Text: "The crusher and shredder will not be operated simultaneously" We operate our shredder frequently as we size our material prior to going through the picking station (as this help elevate blockages) So there will be times when both the crusher and shredder will operate at the same time. However the shredder will be located in the west location behind a large stockpile of waste and the crusher in the east location as stated. Also the shredder is not located behind sea containers as the stockpile of waste to be processed is 5 metres high and is a far greater buffer than a 2.4 metre sea container. The shredder will be located as per the plans but the open space is where the waste resides for entering the picking station.	The basis for this requirement is related to noise, and therefore this requirement has been amended such that the crusher and shredder must not be operated simultaneously <i>when both operating in the eastern part of the premises</i> . The assessment of noise risk has been amended to reflect this.  The distance between the western location that the shredder will operate most of the time (behind a waste stockpile up to 5m in height), and the eastern location that the crusher will operate permanently, means that the risk of noise emissions exceeding the regulations due to both pieces of equipment operating at once is low.
		<b>Page 6: Clean Fill definition</b> Text: "which has not previously been used or subject to any processing of any kind" Is this referring to our Virgin sand that we will transport up from our quarry for resale? And not referring to our recycled clean fill that is a bi-product of our processes on site?	The definition for clean fill is intended to capture the virgin sand and does not include recycled sand. For clarity, 'clean fill' has been removed from Tables 1.2.1 "Waste acceptance" and 1.2.2 "Waste processing" as it is acknowledged that this is not a 'waste' from the Licensee's perspective. The process limits for this material have been moved to a separate condition 1.2.16.



Date	Event	Comments received/Notes	How comments were taken into consideration
		<b>Page 8: Clean Fill (b) Stockpiles shall not exceed 5 Metres in Height.</b> As this would be our virgin sand located next to a 7m bund wall I am not sure why we cannot make the sand pile larger if need be and as it is not recycled and part of our waste operations?	Despite the removal of clean fill from Tables 1.2.1 and 1.2.2, conditions are appropriate for the height of the stockpile and dust suppression to mitigate fugitive dust emissions. It is acknowledged that virgin sand is stored adjacent to a 7m bund wall and therefore condition 1.2.16 includes a height limit of either 5m or 7m if stored next to the bund wall.
		<b>Page 9: Shredding (K)</b> Remove this line, as waste is shredded prior to entering the picking station process so therefore is not separated into waste types. Large amounts are pre sorted, however all waste less than 600mm x 600mm material is shredded for sizing before it can be handpicked and sorted by the air density separator.	The line requiring the shredding of separate waste streams has been removed as requested. It is noted that it directly contradicted line (h) in any case, which allowed shredding of waste unable to be readily sorted due to size/quality. In addition, line (c) has been removed which also required the manual removal of recyclables prior to any mechanical sorting. It is acknowledged that the initial stage of mechanical sorting and removal of large objects, and the subsequent shredding stage are required to allow an efficient sorting process within the picking station.
		<b>Shredding (I)</b> All references to the sea containers need to be removed as the sea containers reside in the middle of our property as a buffer, but all shredding is operational behind the 5m stockpile of waste to be processed when located in the western location.	The allowance for the shredder to operate shielded by the incoming waste stockpile has been added to this section of the licence. This allows either sea containers or waste stockpile to be used to buffer noise, as suitable. It is acknowledged that operation of the shredder behind the waste stockpile will provide greater noise mitigation than the previously allowed operation shielded by sea containers.



## 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



## Appendix A

### Fugitive Emissions

#### Emission Description

*Emission:* Dust emissions from the proposed activities within the new eastern section of the Premises; crushing of concrete and brick, shredding of green waste, storage of virgin sand and vehicle/heavy machinery movement.

*Impact:* Dust emissions beyond the Premises boundary may cause a nuisance to staff on nearby industrial premises or nearby residents. A building which was previously a residence, located 150m to the east of the Premises, is now used as an office. The nearest residences are located approximately 530m east and approximately 750m north east of the Premises.

*Controls:* Sprinklers are used for dust suppression along the drive way and entry roads, on the hopper area of the shredder and above the crushed material stockpile and virgin sand stockpiles. The crusher has an in built water suppression system. Daily sweeping of the trafficable areas is undertaken to reduce the amount of built up sand/debris. A water cart is also available for use within the Premises when needed, such as on the stockpile of incoming waste for sorting. There is a 7m high noise bund along the north eastern boundary of the premises which may provide some benefit in preventing the movement of dust across that boundary of the Premises. The crusher will operate up to 15 hours per week. The mobile shredder will be operated within the eastern section of the premises for up to 5 hours per week when shredding green waste only (will be located within the far western end of the premises when shredding any other wastes).

#### Risk Assessment

*Consequence:* Minor

*Likelihood:* Unlikely

*Risk Rating:* Moderate

#### Regulatory Controls

Existing condition 1.3.3 (now 1.2.8) within the Licence limits the height of the stockpiles of received or processed material to 5m to reduce the risk of dust lift off.

Requirements have been added to condition 1.2.8 (Table 1.2.2 – waste processing) specifying that the crusher and shredder may only operate when their in-built dust suppression systems are operating, and that the crushed material must be stored within an area provided with dust control sprinkler systems.

Requirements have been included within condition 1.2.8 (Table 1.2.2) of the Licence which specify that the crusher shall only be operated for a maximum of 15 hours per week during the premises operating hours, and that the shredder shall only operate in the eastern section of the premises when shredding green waste.

Condition 1.2.16 has also been added to the licence requiring that stockpiles of clean fill (in this case relating to sand from the Licensees quarry) to be located within an area provided with dust control sprinkler systems, and have a stockpile height that does not exceed the height of the bund wall (if located adjacent) or 5m if elsewhere on the premises. Although the sand is not accepted as a waste, there is still potential for dust emissions from the storage if not appropriately managed in the same way that the waste stockpiles are.

#### Residual risk





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

#### Emission Description

*Emission:* asbestos fibres released from unloading of asbestos waste or crushing of asbestos waste if it is undetected within the construction and demolition waste accepted at the Premises.

*Impact:* The release of asbestos fibres may have long term health consequences for staff on the premises and nearby industrial premises or nearby residents. The nearest residences are located approximately 530m east and approximately 750m north east of the Premises.

*Controls:* Asbestos (known or suspected) is not accepted at the premises. The licensee implements an Asbestos Management Plan (AMP) that is consistent with the DER's Asbestos Guidelines in regards to pre-acceptance, acceptance, load inspection and waste processing controls. The AMP is unclear in regards to some aspects of sampling and testing of recycled product and does not include details in regards to the roles and responsibilities of staff under the AMP, staff training or compliance and performance audits and periodic reviews of the AMP.

The Premises price list/advertising and signage at the Premises state that no asbestos is accepted. Drivers delivering waste are interviewed to determine the risk of the load containing asbestos and required to sign the tip docket stating that they are not carrying asbestos. All loads are inspected prior to and during unloading for suspect material. Loads are wet down during unloading. The load will continue to be inspected while being dissected with an excavator. Where asbestos is detected the load is re-loaded for removal from the Premises. All concrete and brick waste is further inspected by staff via the picking station prior to being crushed. The crusher has an in built water suppression system. There is a 7m high noise bund along the north eastern boundary of the premises which may provide some benefit in preventing the movement of dust across that boundary of the Premises. Sprinklers are used for dust suppression above the crushed material stockpile and virgin sand stockpiles.

Product testing is undertaken for the recycled sand and road base product to check that the asbestos content of the products do not exceed 0.001% asbestos weight for weight. However an assessment of the AMP provided within the amendment application against DER's Asbestos Guidelines identified that the sampling and testing frequency for recycled sand and recycled road base does not appear to be consistent with the requirements of DER's Asbestos Guidelines.

#### Risk Assessment

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

#### Regulatory Controls

Condition 1.2.1 within the existing Licence specifies that waste containing visible asbestos or asbestos containing material shall not be accepted. This condition will remain on the Licence.

The dust control requirements within Condition 1.2.8 (Table 1.2.2) have been discussed within the dust emissions risk assessment above.

A number of conditions have been added to the licence that are in line with the DER's Asbestos Guidelines and apply many of the commitments within the AMP for the Premises.

Condition 1.2.2 within the existing Licence specifies that waste that does not meet the acceptance criteria shall be removed from the Premises by the delivery vehicle or where that is not possible stored in a segregated storage area or container and removed from the Premises as soon as



practicable. This condition will remain on the Licence and has been amended to add a requirement that waste that does not meet the acceptance criteria due to asbestos content shall also be wrapped or otherwise contained in a manner that prevents asbestos fibres entering the atmosphere and is clearly labelled.

Condition 1.2.3 specifies that the Licensee must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.

Condition 1.2.4 specifies that the Licensee must include a 'no asbestos' clause in all contracts with material sources.

Condition 1.2.5 specifies that the Licensee must maintain a clearly visible sign saying 'no asbestos' at the entry to the Premises.

Condition 1.2.6 specifies that 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.

Condition 1.2.7 specifies that the Licensee must visually inspect all loads prior to and during unloading and at all stages of the storage, sorting a crushing process to identify asbestos or asbestos containing material.

A requirement has been added to condition 1.2.8 specifying that loads shall be wet down when unloading at the tip off bay, and spread out and thoroughly inspected prior to acceptance for further processing. The requirement for the shredder not to be used unless its dust suppression system is operating has also been added. These measures are to replace a previous requirement from the licence that recyclable material be removed manually prior to any mechanical sorting /shredding. This requirement has been removed as it does not correspond with any environmental benefit and is not practically possible for the Licensee to achieve. The initial thorough checking of loads and mechanical removal of large materials more effectively mitigates the risk of unnecessary dust generation or asbestos going through the shredder, than the manual removal of recyclables prior to mechanical sorting.

The AMP is unclear in regards to the frequency of sampling for recycled sand (though testing is stated as fortnightly), and the sampling frequency proposed for recycled road base meets the reduced sampling requirement within DER's Asbestos Guidelines. The Asbestos Guidelines list the criteria that DER will use to consider and determine a reduction in the sampling frequency. Most significantly as DER does not have records of the recycled sand testing which has been undertaken to date indicating that the product specification has been consistently achieved, and the recycled road base will be a new product produced at the Premises, it is not considered appropriate for the reduced sampling rate to be adopted. Approval from DOH also needs to be sought prior to the approval of a reduced sampling rate. Condition 1.2.14 requires the licensee to ensure that any recycled output contains no more than 0.001%w/w asbestos and condition 1.2.15 requires recycled outputs to be tested to ensure compliance with condition 1.2.14 and at the non-reduced sampling frequency required by DER's Asbestos Guidelines.

Condition 3.1.1 has been added to the Licence specifying an improvement requirement regarding updates required for the AMP to address the difference in the sampling and testing program, the roles and responsibilities of staff under the AMP, staff training, compliance and performance audits and periodic reviews of the AMP.

#### Residual risk

*Consequence:* Major

*Likelihood:* Rare

*Risk Rating:* Moderate