



## Application for Licence Amendment

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Licence Number</b>	L8589/2011/1
<b>Licence Holder</b>	Remondis Australia Pty Ltd
<b>ACN</b>	002 429 781
<b>File Number</b>	2011/007220-1~1
<b>Premises</b>	Remondis Australia, Henderson Liquid Waste Facility 31 Sparks Road HENDERSON WA 6166  Being Lot 134 on Plan 16892 As defined by the Premises maps attached to the licence
<b>Date of Report</b>	13 November 2020
<b>Proposed Decision</b>	Revised licence granted

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**A/Manager Waste Industries**

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

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## 1. Decision summary

Licence L8589/2011/1 is held by Remondis Australia Pty Ltd (Licence Holder) for the Henderson Liquid Waste Facility (the Premises), located at 31 Sparks Road, Henderson.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges, during the operation of the Premises. As a result of this assessment, Revised Licence L8589/2011/1 has been drafted.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Amendment summary

On 24 June 2020 the Licence Holder applied to the department to amend Licence L8589/2011/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The Licence Holder seeks to relocate their beverage destruction plant from Remondis Australia's Canning Vale facility (L9157/2018/1) to their Henderson liquid waste facility.

The product destruction area will be located within a shed spanning 15 m x 40 m. The facility has the capacity to process up to two million litres per year of non-hazardous liquids, such as spoiled soft drinks and fruit juices, with throughput of approximately 130,000 litres per month.

Palletised bottles/cans will be received in the shed and are loose loaded into a hopper to be carried to a shredder, where the liquid portion is removed and stored for further treatment. The solid portion (i.e. containers) will be shredded for sale to local and export markets.

The loading hopper sits above a collection tank to capture any accidental spills during the loading process. This tank has a capacity of 360 litres.

The shredder punctures the containers and allows the liquid portion to be collected in a tank underneath (580 litres capacity), which is itself located within a bunded area with a holding capacity of 970 litres. As only one pallet is processed at a time, the combined collection tank and bunded area is sufficiently sized to contain the whole volume of the pallet (500 litres).

The shredded containers are passed onto a second conveyor and collected in a bin at the end of the line, where they are transported to a holding bunker in Area 1, ready for baling. The collection bin sits on a bunded area with a holding capacity of 970 litres.

The three liquid collection tanks located along the process line are connected via fixed pipes which pump the liquid into two 1,000 litre tanks, the first to capture any potential solids which may pass through the screens, the second is connected to a pump which transports the liquid to a self-bunded tank located outside of the shed. This tank has a capacity of 26,000 litres and consists of a double steel wall. When this tank nears capacity, it will be emptied via tanker and transported offsite to a licensed facility.

This amendment is limited only to the inclusion of the equipment and process described above. There are no additional categories or throughputs as the current licence Category 61, controlled waste type, and throughput are sufficient to accept this waste.

### 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guidance Statement: Risk Assessments* (DER 2017).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 3.1 Source-pathways and receptors

##### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

**Table 1: Licence holder controls**

Emission	Sources	Potential pathways	Control type	Proposed controls
Fire	Storage of shredded cardboard and paper after product destruction.	Air/windborne pathway	Process	Bailing of shredded cardboard
			Process	Bailed materials removed weekly from site
Liquid Spillage / Residual Liquids	Loading, unloading, destruction and storage of beverage containers and liquid waste. Containment Failure.	Seepage and runoff from unplanned spills and residual liquids.	Infrastructure	580 L collection tank with 970 L Bund
			Infrastructure	2 x 1000 L Storage Tank
			Infrastructure	26,000 L double steel self-bunded tank with float sensor. Tank only filled to 75% capacity.
	Infrastructure		970 L Collection bin	
	Equipment /Process		Spill kit and spill kit plan	
	Infrastructure		Existing shed and concrete hardstand where beverage destruction to be set up.	
	Process		Processing pallets individually rather than multiple pallets.	
Noise	Loading, unloading, destruction and storage of beverage containers and liquid waste.	Air/windborne pathway	Process	Hours of operation
			Infrastructure	Shredder located inside shed

Emission	Sources	Potential pathways	Control type	Proposed controls
Odour		Air/windborne pathway	Process	Odour management plan provided Waste tankered off premises

### 3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guidance Statement: Environmental Siting* (DER 2016)).

**Table 2: Sensitive receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Industrial premises	Immediately adjacent to Premises.
Potential future users of groundwater	Downgradient of Premises
Environmental receptors	Distance from prescribed activity
Cockburn Sound	880 m west of Premises
Bush Forever Site 234	350 m east of Premises

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The Revised Licence L8589/2011/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. beverage destruction facility.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 3: Risk assessment of potential emissions and discharges from the Premises**

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
<b>Operation</b>								
Storage of shredded cardboard and paper after product destruction.	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Industrial premises located immediately adjacent to Premises.	Refer to Section 3.1.1 Emissions and controls	C = Moderate L = Rare <b>Medium Risk</b>	Y	Condition 4 – Waste Processing.	N/A
Loading, unloading, destruction and storage of beverage containers and liquid waste	Liquid Spills / Residual Liquids	Overland flow	Industrial premises located immediately adjacent to Premises.		C = Moderate L = Unlikely <b>Medium Risk</b>	N	Condition 1 – Infrastructure list and requirements <b><u>Conditions 12, 13, 14 – Specified Actions.</u></b>	Operational requirements in Condition 1 will ensure that the proposed infrastructure controls are maintained and operated as specified by the manufacturer.  Condition 12 will ensure infrastructure is installed as specified by the manufacturer and within six months of issuing this licence amendment.
Containment Failure		Seepage through infrastructure and underlying soils to groundwater causing deterioration of local water quality	Cockburn Sound  Potential Future users of groundwater downgradient		C = Moderate L = Unlikely <b>Medium Risk</b>	N	Condition 1 – Infrastructure list and requirements <b><u>Conditions 12, 13, 14 – Specified Actions.</u></b>	Condition 13 will ensure that a departure from required specification does not occur except where permitted by Condition 13.  Condition 14 will ensure the Licence Holder audits their compliance with Condition 1 and submits an Environmental Compliance Report.

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Loading, unloading, destruction and storage of beverage containers and liquid waste	Odour	Air/windborne pathway causing impacts to health and amenity	Industrial premises located immediately adjacent to Premises.	Refer to Section 3.1.1 <b>Emissions and controls</b>	C = Moderate L = Unlikely <b>Medium Risk</b>	N	Condition 1 – Infrastructure list and requirements <b><u>Conditions 12, 13, 14, 15 – Specified Actions.</u></b>	The Delegated Officer acknowledges that a number of odour complaints have been received regarding the existing operation, and that this will be dealt with as a separate matter through DWER compliance branch. Operational requirements in Condition 1 will ensure that the proposed infrastructure controls are maintained and operated as specified by the manufacturer.  Specified Actions will determine the construction requirements, and associated quality assurance around construction/installation of the proposed controls.
	Noise	Air/windborne pathway causing impacts to health and amenity	Industrial premises located immediately adjacent to Premises.	Refer to Section 3.1.1 <b>Emissions and controls</b>	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Condition 1 – Infrastructure list and requirements	The Delegated Officer considers the proposed controls adequate in addressing noise emissions on sensitive receptors.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

## 4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

Consultation method	Comments received	Department response
City of Cockburn advised of proposal 20 August 2020	3 September 2020 Due to existing approval for the site – the City of Cockburn does not object. Expansion beyond the current address is not supported.	Advice noted by DWER. No change to Licence or Risk Assessment.
Licence Holder was provided with draft amendment on 19/10/2020	No comments	N/A

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence L8589/2011/1 determined controls and necessary for administration and reporting requirements.

### 5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

**Table 5: Summary of licence amendments**

Condition no.	Proposed amendments
1 (Table 2)	Added Infrastructure related to Beverage Destruction Facility.
3 (Table 3)	Added specification for beverage waste arriving in containers to be processed at Beverage Destruction Facility.
4 (Table 4)	Added waste type relevant to Beverage Destruction Facility– liquid waste in containers- process, and process requirements.
12,13,and 14	Specified Actions – new conditions of the Licence related to Beverage Destruction Facility assembly and installation.

## References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. DER 2019, *Guidance Statement: Decision Making*, Perth, Western Australia.



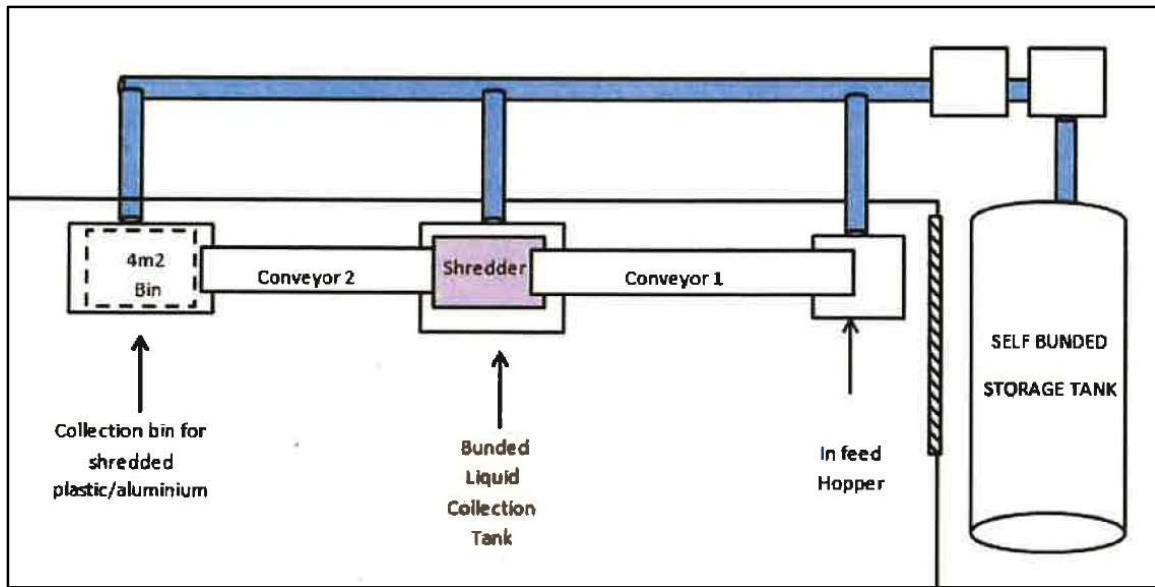
## Appendix 1: Application validation summary

SECTION 1: APPLICATION SUMMARY			
<b>Application type</b>			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L8589/2011/1
		Relevant works approval number:	N/A <input type="checkbox"/>
Date application received	24/06/2020		
<b>Applicant and Premises details</b>			
Applicant name/s (full legal name/s)	Remondis Australia Pty Ltd		
Premises name	Remondis Australia, Henderson		
Premises location	Lot 134 on Plan 16892 (31 Sparks Rd, Henderson)		
Local Government Authority	City of Cockburn		
<b>Application documents</b>			
HPCM file reference number:	2011/007220-1		
Key application documents (additional to application form):	Licence Amendment application - attachment		
<b>Scope of application/assessment</b>			
Summary of proposed activities or changes to existing operations.	<p><i>Licence amendment only.</i></p> <p><i>Build and operation of beverage destruction facility on site.</i></p> <p><i>No additional categories. Already prescribed for cat 61, throughput will increase.</i></p> <p><i>Existing odour issues on site. If beverage destruction has odour issues may impact on risk profile of entire site odour impact.</i></p>		
<b>Category number/s (activities that cause the premises to become prescribed premises)</b>			
<b>Table 1: Prescribed premises categories</b>			
Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity (amendments only)	
<b>Category 61: Liquid Waste Facility</b> - premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	Assessed –existing premises where amendments are being sought within the same category.	<p>Changes only in new infrastructure relating to destruction of beverage and increased throughput</p> <p>1,140,000 Litres per year estimated throughput</p> <p>2,000,000 Litres per year maximum production.</p>	

Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <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"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input checked="" type="checkbox"/> <i>Expiry: 2028</i> Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<i>Approval: Direct Interest letter to Shire required.</i> Expiry date: If N/A explain why?
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: <i>N/A</i> <i>No clearing is proposed.</i>
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: <i>N/A</i> Licence/permit No: <i>N/A</i> <i>No clearing is proposed.</i>
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: <i>Licence / permit not required.</i>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: <i>N/A</i> Type: <i>Proclaimed Groundwater Area/Surface Water Area</i> Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office: <i>Swan Avon</i>

<p>Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: <i>N/A</i>  Priority: <i>N/A</i>  Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)?  Yes <input type="checkbox"/> No <input type="checkbox"/> <i>N/A</i> <input checked="" type="checkbox"/></p>
<p>Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><i>Controlled Waste and Dangerous Goods</i>  <i>Environmental Protection (Noise) Regulations 1997</i>  <i>Environmental Protection (Unauthorised Discharge) Regulations 2004.</i></p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	
<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: <i>N/A</i>  Date of classification: <i>N/A</i></p>

## Appendix 2: Layout of beverage destruction facility



## Appendix 3: Updated site plan

