



Application for Licence

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

Licence Number	L8746/2013/2
Applicant	Bunbury Harvey Regional Council
File number	2013/002341-1
Premises	Wellington Group of Councils Compost Facility Lot 81 Marginata Close CROOKED BROOK WA 6236 Legal description - Part of Lot 81 on Deposited Plan 403943 As defined by the coordinates in Schedule 1 of the licence
Date of report	12 July 2022
Proposed Decision	Licence granted

Stephen Checker

MANAGER WASTE INDUSTRIES

REGULATORY SERVICES

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

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1. Decision summary

The Delegated Officer processed the application to renew licence L8746/2013/2 without a full review and risk assessment of emissions and discharges from the Premises in line with the Department of Water and Environmental Regulation's (department) *Work Instruction: Regulatory Services, COVID-19 licensing position* October 2021. Following DWER's review of the licence in 2019, the Delegated Officer is satisfied that conditions and controls for licence L8756 are appropriate for activities onsite.

The Delegated officer has reissued the licence for a period of 5 years in line with the duration applied for by the Licence Holder. In accordance with the *Guidance Statement on Licence Duration 2016*, the licence can be issued for up to 20 years, however the Licence Holder advised DWER that the initial 2021 date for cessation of operations at the premises and relocation to alternative premises has needed to be delayed for financial reasons related to the establishment of the replacement facility. In renewing the licence, the Delegated Officer determined to:

- update the format and appearance of the licence;
- incorporate licence amendment/s issued prior to the replacement licence;
- remove redundant conditions;
- include conditions considered necessary for the effective administration of the licence (i.e. record keeping and reporting requirements);
- revise licence conditions and consolidate existing pollution control conditions;
- include all infrastructure into condition 1, *Table 1: infrastructure and equipment requirements*;
- correct clerical mistakes and unintentional errors;
- transfer all existing regulatory controls and conditions to the new licence; and
- amalgamate Amendment Notice 1 in the new instrument.

As a result of the above, the Delegated Officer decided to grant Licence L8746/2013/2, subject to conditions set out in the attached licence.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 Application summary and overview of premises

On 07 April 2022 Bunbury Harvey Regional Council (licence holder) applied to renew licence L8746/2013/1 as the licence is due to expire on 14 July 2022. The licence was granted to the licence holder for the premises located at Lot 81 on Deposited Plan 403943, Marginata Close, CROOKED BROOK WA 6236 (Premises).

The licence relates to prescribed premises categories as described in Table 1.

Table 1: Premises category description and production design capacity

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Production / design capacity
Category 67A: Compost manufacturing and soil blending	20,000 tonnes per annual period

Bunbury Harvey Regional Council (BHRC) operate a composting facility at Wellington Group of Councils Compost Facility approximately 3.5 km south-east of Dardanup in the South West region of Western Australia.

This facility accepts FOGO waste, commercial vegetive food waste and greenwaste as feedstocks which are then processed and added to the composting activity.

The material is blended from domestic organics, mulched greenwaste and matured compost to achieve a carbon-to-nitrogen ration of between 20:1 and 40:1 and structure. Additional water is added to ensure moisture content is suitable for aerobic biological activity.

The Facility uses two composting systems in parallel, an open windrow system and a static pile system with forced aeration. The majority of material is initially processed using a static pile system, before final processing of the partially composted material using open windrows.

During composting, water is added as necessary to ensure a moisture content suitable for aerobic biological activity. Any leachate from the composting activities is directed to a 2500 m³ HDPE lined retention dam.

To ensure that the compost is pasteurised in accordance with the EPL and AS4454, each batch of compost is subject to a minimum five-month pasteurisation process during which time each batch is turned a minimum of four times.

Once each windrow has been verified as mature compost, it is processed through a mobile screening unit to grade the compost by particle size. Oversized organic fractions are re-mulched and returned for further composting. Screened mature compost is stored in windrows and monitored to ensure appropriate quality control until despatched to customers.

Compost at the Facility is monitored and processed in batches. Each batch is designated with an identification code that process monitoring data is recorded against. Individual batches are not to be mixed with other batches during the pasteurisation process.

Once a batch has undergone secondary screening, samples are taken and sent to an accredited laboratory to be tested against the physical and chemical requirements as detailed in AS4454-2012. The samples are taken in accordance with the procedures detailed in Appendix 5 of AS4454-2012.

If the test results deem that the batch meets the AS4454 and licence requirements the batch is moved to the final product storage area to await distribution. If the batch does not meet the AS4454 and licence requirements, the batch is either disposed of to landfill or subject to reprocessing in a new batch, depending on the reason for the requirements not being achieved.

The final product is stockpiled in the concrete bunker to prevent the final product from being contaminated by windblown litter. The moisture content of the stockpiles are monitored to ensure that they do not dry out or become overly moist. Excessive moisture content is controlled by the use of tarpaulins to prevent the ingress of winter rainfall.

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 *Guideline: Risk Assessments* (DWER 2020).

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 decision report are detailed in Table 2 below. Table 2 also details the control measures the applicant employs assist in controlling these emissions, where necessary.

Table 2: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Odour	Feedstock acceptance, handling and storage Composting process Final compost screening and storage	Air / windborne pathway	<p>Receipt, handling and storage prior to composting</p> <p>All FOGO and commercial vegetative food waste is added to a mobile aerated floor (MAF) on the same day it is received at the premises.</p> <p>FOGO and commercial vegetative food waste is covered by mulched greenwaste or maturing compost, at the end of each shift</p> <p>Waste is not stored within 5 metres of the Premises boundary</p> <p>Treatment by composting</p> <p>FOGO windrows are treated upon a MAF to ensure aerobic conditions are maintained.</p> <p>FOGO windrows are no more than 1000 tonnes by weight.</p> <p>Microbial odour treatment solution is applied to the FOGO windrows within 24 hours of initial placement on a MAF.</p> <p>Windrows are turned at intervals of no less than 14 days.</p> <p>The core temperature of the composting pile is maintained above 55 °C for a period of at least three days.</p> <p>Windrow turning is suspended, only where practicable, when winds have the potential to impact sensitive receptors.</p> <p>Composting leachate is collected and returned to the composting process.</p> <p>Compost meets the minimum physical and chemical requirements of AS4454 prior to sale or distribution to the public.</p>
Dust	Screening, lift-off from stockpiles and/or stored product, vehicle	Air / windborne pathway	All trucks entering and leaving the Facility are covered to prevent windblown emissions.

Emission	Sources	Potential pathways	Proposed controls
	movements		<p>Roads and working areas are compacted or sealed.</p> <p>Roads will be sprayed during dry periods and/or times of high traffic.</p> <p>Compost windrows have their moisture levels monitored and maintained at greater than 30% moisture during processing and greater than 25% once mature.</p> <p>The composted material being processed within the static pile system is monitored to ensure the surface does not dry out and produce dust. The surface of the material will be sprayed as required to minimise dust generation.</p> <p>The surface of maturation heaps and mature stockpiles of compost monitored daily and sprayed with water as required to minimise dust generation.</p> <p>Speed limits enforced.</p> <p>The surface of compost stockpiles will be assessed prior to loading/handling and sprayed with water as required to minimise dust generation.</p>
Windblown waste	General operations	Air / windborne pathway	<p>Facility users are subject to load and waste acceptance controls that require all normal loads to be secured with nets and tarpaulins to prevent the accumulation of litter along principal site access routes.</p> <p>Regular inspections of incoming vehicles to ensure loads are covered, secure and not contributing to litter.</p> <p>Regular inspections of primary access routes with active litter clean up as required.</p> <p>Procedures in place for decontamination of feedstocks</p> <p>Any visible litter on vehicles is removed prior to leaving the premises.</p> <p>The Facility utilises perimeter fencing in the active tipping and composting area to minimise the risk of litter being emitted from the premises.</p> <p>Facility staff regularly inspect the perimeter fencing for damage and ensure repairs are actioned in a timely manner.</p> <p>Weekly litter collections are undertaken around the perimeter fence to remove any accumulated litter.</p>

Emission	Sources	Potential pathways	Proposed controls
Noise	Operation of vehicles and screening plant	Air / windborne pathway	<p>Plant and vehicles operated only as needed</p> <p>Operations will/do comply with the Noise Regulations at all times</p> <p>Significant separation distance to nearest receptors</p>
Fire/Smoke	Spontaneous combustion of stockpiles, machinery accidents, bushfire.	Air / windborne pathway	<p>Fire control equipment and water supplies are maintained at the premises - A fire control unit is located onsite. The unit is on a towable trailer. Fire extinguishers are in all machinery and administration building. The Shire of Dardanup ensure the Fire Break is maintained each year around the facility as per the Bush Fire's Act.</p> <p>The site layout allows adequate access for emergency vehicles</p> <p>Outdoor stockpiles are managed to achieve the following requirements:</p> <ul style="list-style-type: none"> - The maximum length of an external stockpile will be no greater than 50 m. - The maximum height of an external stockpile (loose piled) will not exceed 2 m. - Fire brigade vehicle access is available on either side of the stockpiles. – <p>Stored combustible materials will be inspected regularly to identify any smouldering areas or smoke, especially during extreme weather conditions and total fire bans (i.e., extreme temperatures).</p> <p>- Combustible solid materials will be stored away from: Powerlines and other ignition sources, Fuels and flammable solvents used for operational purposes, Hazardous and/or controlled waste storage areas.</p>
Leachate	Storage of green waste	Seepage to soil and groundwater	<p>The 12,000 m² hardstand area is bunded to ensure contaminated stormwater is contained within this area.</p> <p>A clean stormwater interception drain is provided along the eastern fence line to prevent stormwater from entering the active composting area.</p> <p>Stormwater bunds are provided to direct contaminated stormwater from the handstand area to a retention basin.</p> <p>A 2500 m³ leachate/stormwater retention basin is provided to the southwest of the active composting area.</p> <p>The retention basin includes:</p>

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> Lined to achieve a permeability of less than 1×10^{-9} m/s or equivalent 2. A minimum top of embankment freeboard of 300 mm is maintained 3. Capacity to store a 72 hour duration, 1 in 10 year ARI critical rainfall event without overflow. <p>The runoff that is collected will be used for compost production, to maintain correct moisture levels.</p>

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the Delegated Officer has excluded the applicant's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

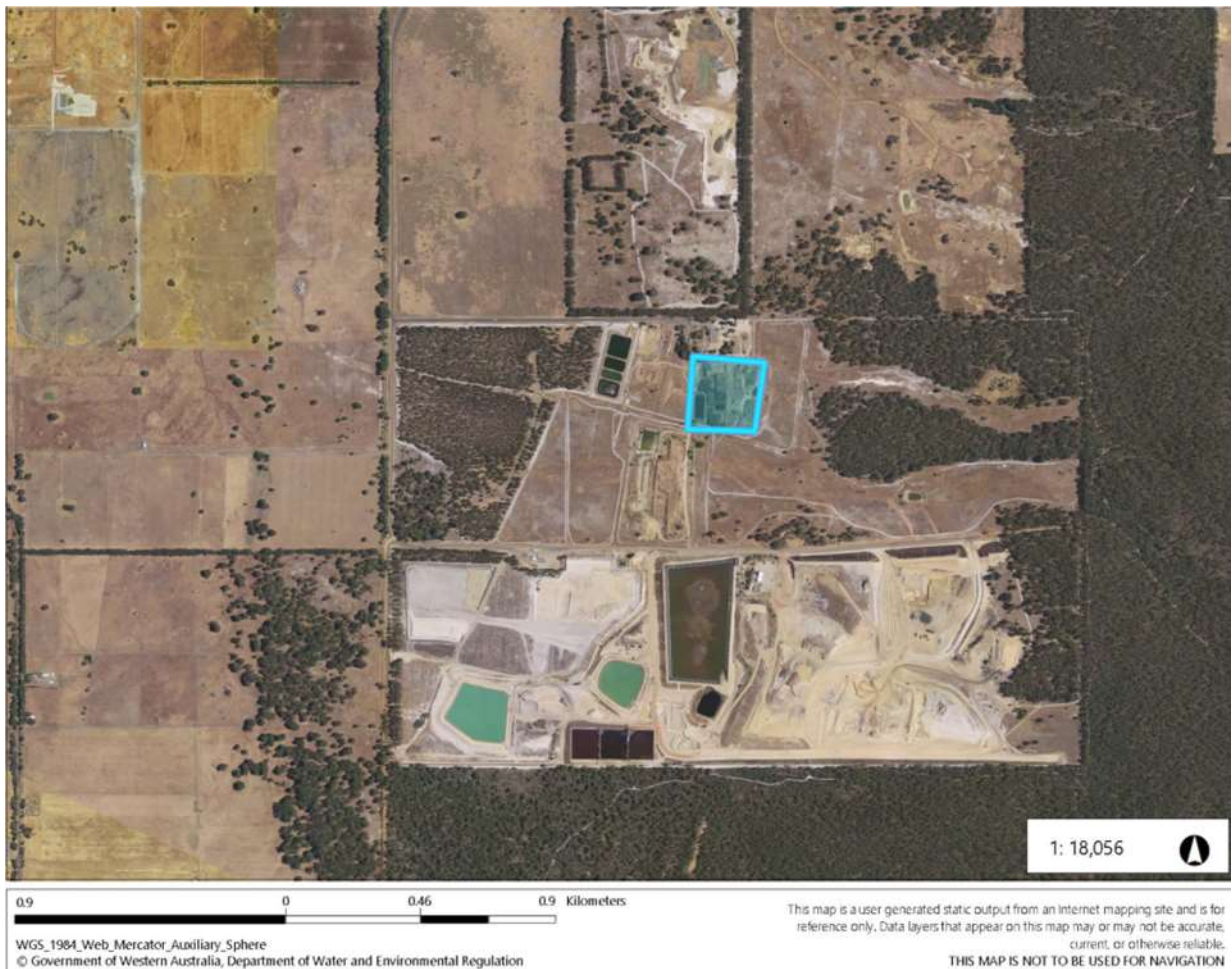
Table 3 and Figure 1 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental Siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
<i>Residential Receptors</i>	<p>The closest residential receptor is located approximately 1.7 km to the south west of the Premises.</p> <p>A residential receptor is located approximately 1.9 km to the north west of the Premises.</p>
Environmental receptors	Distance from prescribed activity
Threatened/Priority Fauna Calyptorhynchus banksii naso (Forest red-tailed black cockatoo)	Located 1.4 km to the south west of the premises
Threatened/Priority Fauna Phascogale tapoatafa (South-western brush-tailed phascogale)	Located 1.4 km to the south east of the premises
Geomorphic Wetlands – palusplain, multiple-use	~ 1.2 km to the west, north-west, and south-west of the premises boundary
Green Growth RSNAs DPaW Managed Lands Commitments	State Forest ~770m east north-east; and Conservation Park ~900m and east of the premises boundary
TEC buffer zones	Priority 3 – Banksia Dominated Woodlands of the Swan Coastal Plain IBRA Region – multiple buffer

	zones within 1km of the premises boundary; and Priority 1 – Dardanup Jarrah and Mountain Marri woodland on laterite ~ 700 m from the premises boundary.
Surface water line - minor	~ 1.5 km south of the premises boundary
RIWI Groundwater and surface water areas	Bunbury Groundwater Area: ~ 840 m west of the premises boundary; and Collie River Irrigation District: ~ 1.3 km north-west of the premise boundary.

Figure 1: Locality of Premises



3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source 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 applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

Licence L8746/2013/2 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. composting activities.

The conditions in the issued licence, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4: Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating ¹	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Feedstock acceptance, handling and storage Composting process Final compost product Product screening Product storage	Noise	Air / windborne pathway causing impacts to health and amenity	Residences 1.7 km south west of the premises Threatened fauna	Refer to Section 3.1	C = Slight L = Possible Low Risk	Y	N/A	The Delegated Officer considers the relatively small size of operations onsite, the separation distance to sensitive receptors and the lack of any previous complaints related to noise from the premises as indicative of the low risk presented by noise onsite. Noise associated with traffic movements outside of the premises boundary is outside of the scope of the licence. The Noise Regulations apply in the event of any noise issues.
	Odour				C = moderate L = Likely High Risk	Y	Condition 9, Table 2	Refer to s. 3.3
	Dust				C = Slight L = Possible Low Risk	Y	Condition 6, Table 1	The Delegated Officer considers that the applicants' controls, high moisture levels of products, lack of any complaints or incidents related to dust from the premises and significant

Licence: L8746/2013/2

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								separation distance to receptors inform the risk of impacts from dust as being low. Applicant controls related to dust have been included the licence to maintain a low risk rating.
		Windblown waste/litter		Residences; Threatened fauna; State Forest, Conservation Park, and TECs	C = Slight L = Possible Low Risk	Y	Condition 3 Condition 12, Table 4	Applicant controls related to waste and litter management have been included the licence to maintain a low risk rating.
		Leachate	Infiltration to groundwater	RIWI Bunbury Groundwater Area; TECs; and Native Vegetation	C = Moderate L = Unlikely Medium Risk	Y	Condition 12, Table 4	The Delegated Officer considers that the existing controls in the licence along with applicants' controls, hardstand processing/storage areas, leachate retention pond and stormwater are adequate to manage leachate emissions from the premises.
Product quality	Pathogens and chemical contaminants	Direct contact	Residences; Customers		C= Minor L = Unlikely Medium Risk	N/A	Condition 10, Table 3	The Delegated Officer considers the existing controls on the Licence relating to the product quality testing and standards in accordance with

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
								AS4454 are sufficient to ensure that final product is fit for purpose and not a risk of causing contamination at end-use sites.
Fire	Smoke	Air / windborne pathway causing impacts to health and amenity	Residences 1.7 km south west of the premises Threatened fauna		C = moderate L = Possible Medium Risk	Y	Condition 11	Applicant controls related to fire (smoke) management have been included in the licence. Fire fighting equipment has been conditioned in the licence and stockpile sizes and separation have been reconfigured in accordance with DWER guideleines.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).

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

3.3 Detailed risk assessment for odour

▪ Identification and general characterisation of emission

The Delegated Officer has identified the key sources of odour emissions during the operational phases at the premises to be as follows:

Feedstock acceptance and handling

Different types of feedstocks pose varying risks regarding odour emissions. The type of feedstock can pose varying risk categories due to the biological content. Some feedstocks such as FOGO may be very odorous at acceptance due to anaerobic conditions in bins/trucks prior to collection and during transport. Interaction between feedstocks and stormwater runoff and rainfall in uncovered areas can also increase odour generation. It is considered that municipal source-separated kerbside garden waste is moderate risk, while mixed source separated kerbside FOGO and animal mortalities are high risk.

DWER's licence review for the premises in 2020 identified that delays in commencement of composting by up to 7 days was leading to anaerobic, odorous conditions in raw material stockpiles. Composting processes were revised in the licence review including to require that FOGO waste is placed immediately upon a mobile aerated floor (MAF), to mitigating the odour risk posed by longer term storage of the raw waste.

Storage of feedstock and product

Some feedstock types have the potential to generate odour emissions if stored inappropriately or for extended periods before composting. For example, food wastes such as fruit and vegetables may not initially generate an unreasonable odour, however the longer they are stored on-site before being composted, the more likely it is that degradation and putrefaction of the feedstock will occur which may result in the generation of unreasonable odours.

The Licence Holder identified that the acceptance of animal mortalities has resulted in excessive odour generation especially in relation to carcasses which do not breakdown sufficiently in two-week periods. The licence holder has advised DWER that animal mortalities are no longer being accepted at the premises.

Compost windrows

If not appropriately managed (i.e. through turning or forced aeration), windrows may become anaerobic causing an increase in the generation of offensive odours. Windrows may also become anaerobic from over-wetting.

Leachate containment system including hardstand, drains and pond

Nutrient rich leachate has the potential to generate odours, particularly when the leachate water has become anaerobic. Leachate from the early composting phase presents the highest risk of odour generation.

▪ Description of potential adverse impact from the emission

Individual responses to odour emissions may vary depending on age, health status, sensitivity, and odour exposure patterns. Perceived odour intensity may increase or decrease on exposure. Community response to an odour can include annoyance, potentially leading to stress, and loss of amenity. Exposure to repeated odour events can create a nuisance effect.

▪ Criteria for assessment

The following criteria have been used to evaluate the risk associated with operational odour:

- Public Health and Amenity – Risk Criteria Table 1 (DER, 2017);

- *EPA Guidance Statement 3 – Separation Distances between Industrial and Sensitive Land Uses (EPA 2005)*
- *Guideline: Odour Emissions (DWER, 2019);*
- *Guidance Statement: Environmental Siting (DER 2016).*

- **Licence Holder controls**

This assessment has reviewed the controls set out in Table 2 (Licence Holder Controls) above

4. Compliance inspections and compliance history

The Premises was identified as a primary source of unreasonable odour in the Dardanup locality prior to DWER’s review of the licence in 2020 with 35 odour complaints received over Oct 2019-Jan 2020, A review of current DWER Compliance and Enforcement intelligence, identified a total of 15 complaints relating to odour from two potential odour sources (including the Premises) in the Dardanup locality in the period 1 January – 20 June 2022. Odour was the only emission identified in complaints potentially related to the Premises over this period.

- **Key findings**

The Delegated Officer has reviewed the information regarding odour impacts from the Premises and has found:

1. *Separation distances to sensitive receptors meet the recommended distances outlined in DWER’s Guideline: Odour Emissions.*
2. *Odour emissions from the Dardanup Waste Precinct continue to have a demonstrated impact on receptor amenity.*
3. *Investigations have previously confirmed the Premises as one of the principal sources of odour in the Dardanup Waste Precinct.*
4. *Following the 2020 review of the premises Licence and update of conditions, a review of DWERs complaints register indicates that odour in the area is still a significant concern for nearby receptors.*
5. *The Delegated Officer is satisfied that revised composting process*
6. *The Licence Holder has identified that animal mortalities are the highest odour risk feedstock accepted at the premises.*

- **Consequence**

If operational odour emissions occur, then the Delegated Officer has determined that local scale impacts to amenity will be mid-level. Therefore, the Delegated Officer considers the consequence of operational odour emissions to be **Moderate**.

- **Likelihood of Risk Event**

Moderate operational odour impacts have been demonstrated to be currently occurring. Therefore, the Delegated Officer considers the likelihood of future operational odour emissions to be **Likely**.

- **Overall rating of odour**

The Delegated Officer has compared the consequence and likelihood ratings described above with the risk rating matrix (Table 7) and determined that the overall rating for the risk of operational odour emissions is **High**.

5. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 25/5/22	<p>Two submission received on 03/06/2022, and 15/06/2022. Key concerns raised were:</p> <ul style="list-style-type: none"> - that the 5-year period requested for licence renewal is too long and that the premises should be closed down within 12 months, and 2 years respectively. . - Concerns regarding emissions (noise, traffic, litter, fire risk emissions to groundwater and odour) – including cumulative impacts - Non compliances with licence conditions (animal mortalities, feedstock storage and aerobic conditions in stockpiles) - Concerns about traffic, zoning/planning and impact to tourism ion the area. - Concerns that the application does not address the quantity of waste and the degree of impacts that will result. 	<p>The Department has a standard policy for licence duration of 20 years for most sites. In this instance the Department has assessed impacts associated with the 5 year duration requested by the applicant as required for the establishment of a replacement facility and found impacts are not unacceptable and has granted the licence for that period accordingly.</p> <p>Impacts from odour, fire (smoke impacts), noise from premises operations and other emissions have been assessed and are documented under s.3.2 and 3.3. As part of the renewal, the Department has added additional controls relating to odour (prohibition of acceptance of high-odour animal mortalities); firefighting infrastructure, stockpile size and windblown waste collection</p> <p>Concerns related to tourism impacts, zoning, and offsite traffic impacts are matters for the LGA and are outside of the remit of the licence.</p> <p>No increase in waste acceptance has been proposed, nor granted, as part of this licence renewal.</p>
Applicant was provided with draft documents on 23/06/2022	Refer to Appendix 1	Refer to Appendix 1

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that the application to renew licence L8746/2013/2 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

7. Summary of changes to the licence conditions

Section 62 of the *Environmental Protection Act 1986* (EP Act) provides the legal power to attach conditions to licences. Most licences are issued with conditions as per *Guidance Statement – Setting Conditions* (October 2015) to prevent, control, abate or mitigate pollution or environmental harm as a result of the emissions and/or discharges from the premises in question.

Table 6 summarises the changes from the expiring licence into the new licence including changes made to licence conditions where required and the rationale for changes made.

Table 6: Licence conditions changes, description, and rationale

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Expiry Date: 14/07/2022	Expiry Date: 14/07/2027	Renew licence for a further 5 years until 14/07/2027 as requested
N/A	Definitions	Definitions	Revised to current licencing format; and Inclusion of new definition for 'batch' in line with Compliance and Enforcement advice.
N/A	Prescribed Premises Category table	N/A	Revised to current licensing format.
1.1.1 1.1.2	Interpretation and definitions	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.1.3	Australian or other standard	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.1.4	Reference to code of practice	N/A Interpretation section, Definitions and Table 1	Redundant condition. Revised to current licensing format.
1.2.1	General operational condition	Condition 1	Updated numbering system
1.2.2	Spills of environmentally hazardous materials	Condition 2	
1.2.3	Contaminated stormwater	Condition 3	
1.2.4	Boundary markers	Condition 4	
1.3.1 Table 1.3.1	Waste acceptance	Condition 5 Table 1	New numbering and revised to current licensing format.
1.3.2	Rejected / nonconforming waste	Conditions 6 and 7	
1.3.3 Table 1.3.2	Waste processing	Condition 8 Table 2	

Existing condition	Condition summary	Revised licence condition	Conversion notes
Table 1.3.3	Physical and chemical requirements for compost prior to distribution to the public	Condition 9 Table 3	Added condition number and updated to new format
1.3.4 Table 1.3.4	Containment infrastructure	Condition 10 Table 4	New numbering and revised to current licensing format.
2.1.1	Monitoring equipment	Condition 11	Updated numbering system
2.2.1 Table 2.2.1	Monitoring inputs and outputs	Condition 12 Table 5	New numbering and revised to current licensing format.
2.3.1 Table 2.3.1	Process monitoring	Condition 13 Table 6	
3.1.1 – 3.1.4	Records	Condition 14 - 17	
3.2.1 Table 3.2.1	Annual environmental report	Condition 18 Table 7	
3.2.2	Annual environmental report	Condition 19	
3.3.1	Notification	Condition 20	
Schedule 1: Maps	Premises map	Schedule 1: Maps	New naming convention, no change to map
Schedule 2 Reporting & notifications	Annual Audit Compliance Report Form N1 Notification	N/A	Redundant attachment. Deleted from Licence Forms accessed at www.dwer.wa.gov.au

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 11 (c) (ii) & (iii)	<p>The applicant requested to reconfigure stockpile dimensions to allow a maximum height of 4m with a minimum separation of 2.5 m between piles</p>	<p>DWER's composting guidelines indicate a minimum 6 m separation between stockpiles should be achieved.</p> <p>The applicant advised on 08/07/2022 that they will be able to reconfigure stockpiles to achieve the 6 m separation distance with the 4 m height and maintain the same length and width as current conditions. The Delegated Officer considers that separation distance between stockpile is a key metric in mitigating potential fire (smoke) impacts and therefore has updated the condition on the licence in accordance with the applicants request and DWER's guideline.</p>
Section 3.1.1 of Decision Report	<p>Applicant provided the following details about the fire control equipment and water supplies that are maintained at the premises.</p> <p>A fire control unit is located onsite. The unit is on a towable trailer. Fire extinguishers are in all machinery and administration building. The Shire of Dardanup ensure the Fire Break is maintained each year around the facility as per the Bush Fire's Act.</p>	<p>Fire control equipment added to the applicant controls table and conditioned on the licence under fire controls.</p>

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
Works approval					
Licence	<input type="checkbox"/>	Relevant works approval number:			
Licence Renewal	<input type="checkbox"/> <input type="checkbox"/>	Has the works approval been complied with?		None	Has the works approval been complied with?
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
		Date Report received:	Yes <input type="checkbox"/> No <input type="checkbox"/>		
		Current licence number:	Renewal		
Amendment to works approval	<input type="checkbox"/>	Current works approval number:	Amendment to works approval		
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	Amendment to licence		
Amendment to licence Registration	<input type="checkbox"/> <input type="checkbox"/>	Relevant works approval number:			
		Current works approval number:	Registration	<input type="checkbox"/>	Current works approval number:
Date application received	7/04/2022		Date application received	7/04/2022	
Applicant and Premises details					
Applicant name/s (full legal name/s)					
Premises name		BUNBURY WELLINGTON ORGANICS RECOVERY FACILITY			
Premises location		PART OF LOT 81 ON DEPOSITED PLAN 403943 LOT 81 MARGINATA CLOSE, CROOKED BROOK WA 6236			
Local Government Authority		SHIRE OF DARDANUP			
Application documents					
HPCM file reference number:					
Key application documents (additional		Licence Renewal Supporting Information – Bunbury			

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)		
to application form):	Wellington Organics Recovery Facility	
Scope of application/assessment		
Summary of proposed activities or changes to existing operations.		
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description		
Category 67A - Compost manufacturing and soil blending: premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to produce commercial quantities of compost or blended solids		
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 type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: 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"/>	Approval: 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: N/A No clearing is proposed.

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)		
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: N/A Licence/permit No: N/A No clearing is proposed.
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: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Name: N/A Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office: South West
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Classification: Possibly contaminated – investigation required. Date of classification: 28 May 2014 DMO8352