



Licence Number L7200/1997/10

Licence Holder Cleanaway Pty Ltd

ACN ACN 000 164 938

File Number: 2010/008332

Premises Gordon Road Transfer Station
Lot 4304 on Plan 193020
Corsican Place
PARKLANDS WA 6180

Date of Amendment 24/08/2017

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act and follows.

Date signed: 24 August 2017

Alan Kietzmann

MANAGER LICENSING – WASTE INDUSTRIES

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

Definitions and interpretation

Definitions

In this Amendment Notice, the terms in Table 1 have the meanings defined.

Table 1: Definitions

| Term | Definition |
|----------------------------|---|
| AACR | Annual Audit Compliance Report |
| ACN | Australian Company Number |
| AER | Annual Environment Report |
| Category/ Categories/ Cat. | categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations |
| CEO | means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 33 Cloisters Square PERTH WA 6850 info-der@dwer.wa.gov.au |
| CS Act | <i>Contaminated Sites Act 2003</i> (WA) |
| Decision Report | refers to this document |
| Delegated Officer | an officer under section 20 of the EP Act |
| DWER | Department of Water and Environmental Regulation |
| EPA | Environmental Protection Authority |
| EP Act | <i>Environmental Protection Act 1986</i> (WA) |
| EP Regulations | <i>Environmental Protection Regulations 1987</i> (WA) |
| EPBC Act | <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) |
| Existing Licence | The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review |
| Licence Holder | Cleanaway Pty Ltd |
| m ³ | cubic metres |
| Minister | the Minister responsible for the EP Act and associated regulations |

| | |
|---------------------|--|
| MS | Ministerial Statement |
| mtpa | million tonnes per annum |
| NEPM | National Environmental Protection Measure |
| Noise Regulations | <i>Environmental Protection (Noise) Regulations 1997 (WA)</i> |
| Occupier | has the same meaning given to that term under the EP Act. |
| Prescribed Premises | has the same meaning given to that term under the EP Act. |
| Premises | refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report. |
| Risk Event | as described in <i>Guidance Statement: Risk Assessment</i> |
| UDR | <i>Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)</i> |

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

This notice is limited only to an amendment for Category 62. No changes to the aspects of the original Licence relating to Category 57 have been requested by the Licence Holder.

The following guidance statements have informed the decision made on this amendment:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (February 2017)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

Additional documents used to inform the decision are listed in Appendix 1.

Amendment description

Cleanaway Pty Ltd (the Licence Holder) operates the Gordon Road Transfer Station under Licence L7200/1997/10 which was granted on 15 November 2012. It authorises the storage of up to 50,000 tonnes of waste per year (category 62) and less than 300 tyres at any one time (category 57). Waste types accepted include: Inert Waste Type 1 and Inert Waste Type 2; putrescible; Special Waste Type 1; household hazardous wastes; scrap metal; waste oil; and car batteries.

The Licence Holder submitted an amendment application to DER on the 13 June 2017. The following amendments were requested:

1. Increase Category 62 throughput from 50,000 tonnes per annual period to 60,000 tonnes per annual period to account for anticipated future growth.
2. Increase the volume of green waste and mulch that can be stored at the Premises at any one time. Green waste volumes are requested to be increased from 1,500 m³ to 9,000 m³ and mulch volumes are requested to be increased from 500 m³ to 3,000 m³.
3. Resolution of two potentially conflicting conditions S8(a) and N1. Condition S8(a) states that "no waste remains in the waste transfer station push pit for longer than 24 hours" however Condition N1 restricts operating hours creating a 36 hour period whereby no operations can occur. The Licence Holder's preference is to allow for Sunday operations to clear any buildup of waste.

Table 2 below outlines the proposed changes to the Licence Categories.

Table 2: Proposed throughput capacity changes

| Category | Current throughput capacity | Proposed throughput capacity | Description of proposed amendment |
|----------|---------------------------------|---------------------------------|---|
| 62 | 50,000 tonnes per annual period | 60,000 tonnes per annual period | Increase of 10,000 tonnes per annual period |

As part of the amendment the Licence Holder has provided the following information in relation to changes at the Premises and proposed emission controls:

- The Premises has implemented a waste compaction system which enables a 350% increase in the weight of waste that can be removed from the Premises at any one time, reducing the number of vehicle loads required to transport waste to landfill each day.
- A new dust suppression system has been installed inside the waste transfer shed to minimise dust emissions during tipping/loading.
- The previous leachate collection system has had an upgraded pump installed and new instrumentation to test the water quality has been acquired.
- The hardstand area for green waste and mulch storage has been expanded to enable clear separation between the green waste receival area, mulch storage area and a loading zone for removal vehicles.
- There is a five metre separation distance between the green waste and mulch pile, vegetation on site and the site boundary. There are also emergency fire hydrants adjacent to the green waste area and a portable 900 litre tank with a pump.
- A change in contractor has enabled the introduction of newer more efficient green waste grinders which the Licence Holder states are quicker and quieter than the infrastructure previously used.
- A new contract also requires mulch product to be collected within four weeks.
- An increase in the volume of green waste allowed to be stored at the Premises would result in a single larger grind of green waste every 10 to 12 weeks compared to the current requirement for grinding every 1 to 2 weeks.
- If Sunday operations are permitted the Licence Holder will limit compactor operations to between 9 am and 4 pm, and anticipates that use of the compactor will rarely exceed two 40 minute loading cycles.
- Updated site plan.

Amendment history

Table 4 provides the amendment history for L7200/1997/10.

Table 3: Licence amendments

| Instrument | Issued | Amendment |
|---------------|-----------|---|
| L7200/1997/10 | 5/06/2013 | Increased throughput of category 62 from 25,000 tonnes per annual period to 50,000 tonnes per annual period. Addition of condition restricting hours of operation of compactor and improvement conditions requiring submission of a noise assessment. |
| L7200/1997/10 | 5/05/2016 | Change of occupier name, address, extension of expiry date to 2023 and removal of outdated conditions. |
| L7200/1997/10 | 24/8/2017 | Amendment Notice 1: Increase throughput and green waste storage capacity |

Complaints history

A review of DWER's Incident and Complaint's Management System indicates that there have been no complaints in the past four years that have been confirmed to be attributed to the Premises.

DWER has received an increased number of odour complaints in the Mandurah area over the past few years. Investigations to date have indicated that there is a high likelihood that these odours are from composting or piggery operations in the area, however there is a possibility that the Premises is a contributor to odour impacts in the area. Due to the volume of complaints it has not been possible for DWER to verify the source of all complaints. The Delegated Officer has determined that the potential for odour complaints should be considered when determining the likelihood of odour impacts.

Compliance history

The Premises was most recently inspected in relation to the licence conditions on the 27 September 2016. The purpose of the inspection was to assess the regulatory controls in place to manage and mitigate environmental impacts. At the time of the inspection DWER officers did not identify any material issues. It was noted that the Licence Holder was not complying with condition W3 of the licence (wastewater disposal requirements). The Licence Holder subsequently provided DWER with evidence of how they were now complying with this condition.

The Premises was also inspected on 1 March 2016 for the purpose of assessing the controls in place related to odour impacts. At the time of the inspection DWER officers determined that the operational and regulatory controls in place were sufficient to mitigate odour emissions.

The Premises has been inspected eight times over the past two years in relation to the Landfill Levy, and was found to be compliant on all occasions.

A review of Annual Environmental Reports and Annual Audit Compliance Reports submitted to DWER in the past three years indicated that in 2015 the Licence Holder was found to be non-compliant with a number of reporting and monitoring requirements. The Licence Holder subsequently provided the required information. In 2016 the Licence Holder was compliant with all reporting requirements. Reports for 2017 have been submitted by the due date and the Licence Holder has not reported any non-compliance with licence conditions however these reports are yet to be formally reviewed by DWER.

Noise modelling

The Licence Holder was required to submit a noise assessment under an improvement condition of the Licence added in the June 2013 amendment. The report was submitted in June 2015 and demonstrated that noise emissions from the operation of the compactor would be likely to comply with the assigned levels in the Noise Regulations. The Licence Holder has advised DWER that the same machinery is still in place at the same locations, and therefore the results of the 2015 noise modelling are still considered relevant.

Location and receptors

Table 4 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 4: Receptors and distance from activity boundary

| Residential and sensitive premises | Distance from Prescribed Premises |
|------------------------------------|-----------------------------------|
| Residential premises | 180 metres west |
| Residential premises | 160 metres north |

Table 5 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 5: Environmental receptors and distance from activity boundary

| Environmental receptors | Distance from Prescribed Premises |
|--|-----------------------------------|
| Indian Ocean | 2 km west |
| Conservation Category Wetland (Goegrup Lake) | 1.3 km south east |
| Groundwater | 10.5 metres below ground level |

Risk assessment

Table 6 below described the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. The table identifies whether the emissions present a material risk to public health or the environment, requiring regulatory controls

Table 6: Risk assessment for proposed amendments during operation

| Risk Event | | | | | | Consequence rating | Likelihood rating | Risk | Reasoning |
|-------------------|--|---|--|--|---|--------------------|-------------------|--------|---|
| Source/Activities | | Potential emissions | Potential receptors | Potential pathway | Potential adverse impacts | | | | |
| Cat 62 | Increased volumes of solid wastes and green wastes stored at the Premises. | Dust | Residences 180 metres west and 160 metres north | Air | Health and amenity impacts | Minor | Unlikely | Medium | Prevailing winds are southerly and will direct dust emissions towards residences. Based on no dust complaints received over the past four years, and controls implemented by Licence Holder. |
| | | Leachate | Groundwater with beneficial use 10.5 metres below ground level Indian Ocean 2 km west Goegrup Lake 1.3 km east | Seepage or overland flow of leachate direct discharge via irrigation | Adverse impacts to groundwater quality, and subsequently groundwater dependent ecosystems | Minor | Unlikely | Medium | Based on distance to receptors, and controls implemented by Licence Holder. |
| | | Noise | Residences 180 metres west and 160 metres north | Air | Amenity impacts | Minor | Possible | Medium | Prevailing winds are southerly and will direct noise emissions towards residences. Based on no noise complaints received over the past four years; the reduction in transport loads and grinding frequencies that will occur with the increase throughput; new machinery; and controls implemented by the Licence Holder. |
| | | Odour | Residences 180 metres west and 160 metres north | Air | Amenity and health impacts | Minor | Possible | Medium | Prevailing winds are southerly and will direct odour emissions towards residences. Based on possibility of some odour complaints in the area being attributable to the Premises, and controls implemented by the Licence Holder. |
| | | Asbestos | Residences 180 metres west and 160 metres north | Air | Health impacts | Severe | Rare | High | Based on acceptance of asbestos at the Premises, and controls implemented by the Licence Holder. |
| | | Smoke and particulates from fire (upset conditions) | Residences 180 metres west and 160 metres north | Air | Amenity and health impacts | Moderate | Rare | Medium | Based on the increased storage of green waste, distance to receptors and controls implemented by the Licence Holder. |

| Risk Event | | | | | | Consequence rating | Likelihood rating | Risk | Reasoning |
|-------------------|--|---------------------|---|-------------------|---------------------------|--------------------|-------------------|------|--|
| Source/Activities | | Potential emissions | Potential receptors | Potential pathway | Potential adverse impacts | | | | |
| | | Windblown waste | Residences 180 metres west and 160 metres north | Air | Amenity impacts | Slight | Possible | Low | Based on previous compliance inspections, and controls implemented by the Licence Holder |
| | Additional operation of compactor on Sundays | Noise | Residences 180 metres west and 160 metres north | Air | Amenity impacts | Slight | Unlikely | Low | Based on the short duration that the compactor is used, noise modelling demonstrating specific consequence criteria can be met and no noise complaints during current operations |

Decision

Throughput and waste storage

The Delegated Officer has determined that based on acceptable risk ratings for all potential emissions, the licence will be amended to permit 60,000 tonnes of waste to be accepted at the Premises per annual period, and to permit the storage of up to 9,000 m³ of green waste and 3,000 m³ of mulch at any one time. No additional waste types are proposed to be accepted at the Premises. Specific emission controls are discussed below.

Dust controls

The Delegated Officer considers that there is a medium risk of impacts from dust emissions from the proposed amendments, particularly due to the potential for increased stockpile sizes. Therefore this risk is considered acceptable subject to regulatory controls.

The complaints history of the Premises indicates that there have been no dust complaints received by DWER in regards to the Premises.

The Delegated Officer has determined that current condition A1 relating to dust suppression is not sufficiently enforceable in accordance with *Guidance Statement: Setting Conditions (October 2015)* and will therefore be reworded to refer to the specific dust control measures that the Licence Holder implements on site.

The Licence Holder will be subject to the general provisions of the EP Act.

Leachate controls

The Delegated Officer considers that there is a medium risk of impacts from leachate emissions from the proposed amendment. Therefore this risk is considered acceptable subject to some regulatory controls.

The Delegated Officer has determined that current controls on the licence requiring hazardous wastes to be stored on bunded hardstand areas, green waste and inert waste to be stored on hardstand areas, stormwater to be directed away from storage areas, and limits on waste water emissions including monitoring are appropriate and necessary. The Delegated Officer has determined that it is necessary to specify that putrescible wastes, waste oils and car batteries are stored within specific locations on the Premises to minimise the likelihood of leachate emissions from the Premises as the current licence does not specify any storage requirements for these waste types. This control replicates the activities currently occurring at the Premises.

Noise controls

The Delegated Officer has determined that there is a medium risk of impacts from noise emissions from the use of the compactor at the Premises including Sunday operations. Therefore this risk is considered acceptable subject to regulatory controls.

The complaints history of the Premises indicates that there have been no noise complaints in regards to the Premises in the last four years. Additionally, a proposed decrease in the number of grinding events per year may contribute to reduced noise emission impacts due to less frequent events.

Noise modelling provided by the Licence Holder demonstrates that the operation of the compactor during the week and on weekends (both day and night) was likely to comply with the Noise Regulations.

The Delegated Officer has also determined that due to the moderate risk of noise emission impacts the operation of the compactor on Sundays will be restricted to the hours of 9am to 4pm as proposed by the Licence Holder in their amendment application.

The Delegated Officer notes that permitting use of the compactor on a Sunday is likely to minimise potential odour emission impacts by reducing the time waste might be stored at the Premises.

Odour

The Delegated Officer considers that there is a medium risk of impacts from odour emissions from the proposed amendments. Therefore this risk is considered acceptable subject to regulatory controls.

Complaints history from the Premises is inconclusive and there is a possibility that some odour complaints in the area may be attributable to the Premises. The storage of larger volumes of green waste for longer periods of time may result in decomposition and anaerobic conditions in the stockpiles which can cause an increase in odour emissions particularly when the stockpile is disturbed.

The Delegated Officer has determined that to minimise the likelihood of odour emission impacts from the proposed amendment the current requirement on the licence to ensure waste does not remain in the push pit for more than 24 hours and the pit is washed down at least once every seven days will remain on the licence. An additional control will be added to the licence requiring that mulched green waste be removed from the premises within four weeks of mulching. This control replicates the timeframe specified by the Licence Holder in their application and is considered necessary to reduce the amount of time that the mulched green waste may decompose and cause odour and leachate emissions. The Licence Holder will also be subject to the general provisions of the EP Act.

Asbestos

The Delegated Officer considers that there is a high risk of impacts from asbestos emissions from the proposed amendments. Therefore this risk is considered acceptable subject to multiple regulatory controls.

Previous compliance inspections have determined that the current controls on the licence were appropriate at the time to mitigate risks from operations at the Premises.

The Delegated Officer has determined that the current licence controls requiring that asbestos wastes are wrapped to contain asbestos fibres and to be stored in a dedicated bin are appropriate and necessary and will be retained. Additional controls will be added which require that the asbestos storage area is clearly signposted, and will further minimise potential impacts by preventing any accidental handling of the material.

Smoke controls

The Delegated Officer considers that there is a medium risk of impacts from smoke and particulate emissions in the event of a green waste fire (upset conditions). Therefore this risk is considered acceptable subject to regulatory controls.

The Delegated Officer has determined that the current licence conditions requiring fire breaks, temperature monitoring and restricting the burning of any waste are sufficient to minimise the risk of potential smoke emission impacts. Additional controls will be required which are derived from DFES Information Note Bulk green Waste Storage Fire (September 2014) which limits the maximum size of each stockpile, distances between stock piles and the requirement to aerate the stockpile if temperatures are above 70°C.

The Licence Holder will also be subject to the general provisions of the EP Act.

Windblown waste controls

The Delegated Officer considers that there is a low risk of impacts from windblown waste emissions from the proposed amendment. Therefore this risk is considered acceptable and will generally not be subject to regulatory controls.

The Delegated Officer has determined that to minimise the likelihood of impacts the current

licence conditions requiring windblown waste to be kept within the Premises, and covering transfer bins prior to leaving the Premises will be kept on the licence. The Licence Holder will also be subject to the general provisions of the EP Act.

Administrative amendments

The Delegated Officer has determined that a number of definitions and references are required to be updated due to the above amendments, and to reflect the change of Department name.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 25 July 2017. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 2.

Amendment

1. The Prescribed premises category of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

PRESCRIBED PREMISES CATEGORY

Schedule 1 of the Environmental Protection Regulations 1987

| CATEGORY | DESCRIPTION | CAPACITY |
|-----------------|---|---|
| 62 | <i>Solid waste depot: premises on which waste is sorted, or stored, pending final disposal or re-use.</i> | 50,000 <u>60,000</u> tonnes per year <u>annual period</u> |
| 57 | <i>Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.</i> | <i>Less than 300 tyres at any one time</i> |

2. The Licence is amended by the insertion of the following Definitions:

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

'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 these.

'DWER' means Department of Water and Environmental Regulation.

'Noise Regulations' means the Environmental Protection (Noise) Regulations 1997.

3. Definitions of the Licence are amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

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

'Green waste' means ~~waste that originates from trees or plants~~ 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.

4. Condition S2 of the Licence is amended by the insertion of the red text shown in underline below:

S2 The Licensee shall ensure asbestos or ACM waste (Special Waste Type 1) shall not be accepted into the premises unless it is wrapped to effectively contain asbestos fibres and placed in a dedicated bin which is clearly signposted.

5. Condition S7 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

S7 The Licensee shall take the following measures relating to storage of green waste on the premises:

- (i) ~~no greater than 1500~~ 9,000 m³ of green waste shall be stored at any one time;
- (ii) ~~no greater than 500~~ 3,000 m³ of mulched green waste shall be stored at any one time;
- (iii) ~~all mulched green waste shall be stored in Windrows~~ which are no more than 50 metres in length, 10 metres in width and 5 metres in height;
- (iv) ~~temperatures within mulched green waste Windrows shall be monitored on a weekly basis~~ and aerated if temperatures are 70°C or above;
- (vi) ~~all green waste Storage Areas shall be on a base of compacted limestone or other Hardstand; and~~
- (vii) ~~a five metre firebreak shall be maintained around green waste Storage Areas~~ and between individual stockpiles;
- (vii) green waste shall be mulched at least every two months; and
- (viii) mulched green waste shall be removed from the Premises within four weeks of mulching.

6. The Licence is amended by the insertion of the following Conditions S12, S13 and S14:

S12 The Licensee shall store putrescible wastes (excluding green waste) within the waste transfer station push pit.

S13 The Licensee shall store car batteries in a sealed container within the waste transfer shed.

S14 The Licensee shall store waste oils within a designated waste oil receival area.

7. Condition A1 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

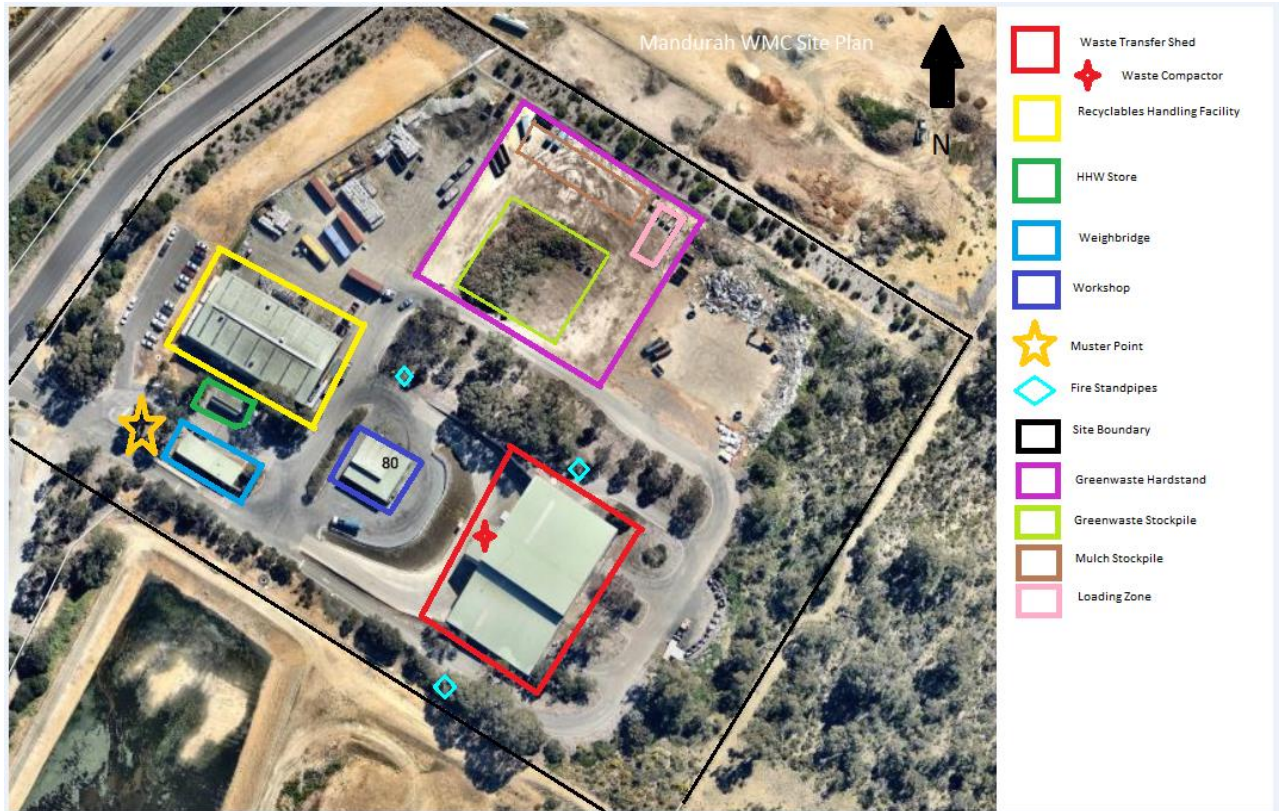
A1 ~~The Licensee shall operate water spray(s), erect wind barriers or take other suitable measures as necessary to control dust from operational and transport activities, stockpiles and open areas.~~ must operate the dust suppression system within the waste transfer shed when dust is evident, and erect wind barriers around any open waste stockpiles to prevent fugitive dust emissions.

8. Condition N1 of the Licence is amended by the deletion of the text shown in strikethrough and the insertion of the red text shown in underline below:

N1 The licensee shall ensure that the compactor unit is operated only between the hours of:

- (i) 07:00 and 19:00 ~~hours~~, Monday to Saturday; and
(ii) 09:00 and 16:00 on Sundays.

9. The Licence has been amended with the inclusion of a site plan for the Prescribed Premises in Attachment 1 – Mandurah Transfer Station Site plan.



Appendix 1: Key documents

| | Document title | Availability |
|---|---|--|
| 1 | Amendment Application Documentation | DWER records (A1450328) |
| 2 | DFES Information Note – Bulk Green Waste Storage Fires (September 2014) | Accessed at www.dfes.wa.gov.au |
| 3 | L7200/1997/10 Cleanaway Pty Ltd Gordon Road Transfer Station | Accessed at www.dwer.wa.gov.au |
| 4 | Noise Report – Gordon Road Transfer Station | DWER records (A922680) |

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 25 July 2017 for review and comment. The Licence Holder responded on 03 August 2017.

| Condition | Summary of Licence Holder comment | DWER response |
|-----------|--|--|
| S7 | <p>DWER proposed to remove the word 'mulched' to require all green wastes to be stored in windrows and monitored. The Licence Holder requested that the word mulched be retained as the storage of fresh green waste in this manner is not reasonable with the storage capacity available at the Premises. Additionally green waste is only stored over a short period of time (less than 6 weeks) which decreases the likelihood of decomposition.</p> <p>DFES guidelines specify that stockpile location should take into consideration the location of emergency services, and availability of firefighting services. There are front end loaders available on site and six fire hydrant standpipes within 20 metres of the stockpile and the Premises is 2km from the nearest DFES facility, meaning a very quick response time to any fire at the Premises.</p> | <p>The Delegated Officer has considered the request and determined that the risk of impacts from smoke and odour emissions are appropriately managed with the controls placed on the mulched stockpiles, and it is not necessary to require that the green waste is also stored in the same manner due to the short storage timeframes. Therefore the word 'mulched' will be retained in the condition.</p> <p>As the risk of smoke and odour emissions is determined based on the length of time the green waste and mulched green waste is stored on the Premises, an additional condition specifying that the Licence Holder must mulch green waste at least every two months will be included on the licence to ensure that the stockpiles are being processed and removed from the Premises in a regular manner to avoid potential decomposition or combustion.</p> |
| S12 | <p>DWER proposed a new condition which requires that a number of waste types are to be stored on a bunded hardstand area. This description does not accurately describe the infrastructure currently at the Premises and may create confusion for compliance matters.</p> | <p>The Delegated Officer has considered the comments and determined that the condition will be reworded into three new conditions to refer to the specific infrastructure currently at the Premises. The Delegated Officer notes the Licence Holder's commitment to improve the waste oil storage infrastructure in the 2017-18 financial year and may review the wording of the condition in future.</p> |

| Condition | Summary of Licence Holder comment | DWER response |
|--------------|---|--|
| A1 | DWER proposed to alter the condition to require the operation of the dust misting system during tipping and loading activities, however the Licence Holder has requested this be altered to refer to 'when dust is evident'. The walls of the transfer shed are considered to be the primary dust control, and the requirement to operate the dust suppression system during all activities would result in an increase in potential leachate emissions. Waste is predominately damp putrescible waste which is not likely to generate significant dust emission. | The Delegated Officer has considered the comments and determined that the use of the misting system when dust is evident will appropriately mitigate potential dust emission impacts, particularly due to the shed walls and the nature of the waste material. The Delegated Officer notes the impracticalities of continually wetting down the waste. Therefore, the condition will be worded to refer to 'when dust is evident'. |
| N/A | DWER proposed that noise monitoring is to be undertaken to verify the noise emissions from the Premises. The Licence Holder advised that all equipment at the Premises was on site in their current positions during the time of the previous noise assessment, and that the only changes are a number of pieces of machinery which have been removed. | The Delegated Officer proposed the condition due to the uncertainty of the equipment in place at the time of the original assessment. As the Licence Holder has confirmed that there has not been any additional equipment installed since the assessment there is no need for additional monitoring. |
| Attachment 1 | Updated site map provided | The site map is updated to the attachment provided by the Licence Holder |