



Amendment Notice #1

Licence Number L7799/2001/8

Licence Holder Southern Metropolitan Regional Council

File Number: L7799/2001/8

Premises Regional Resource Recovery Centre
350 Bannister Road
CANNING VALE WA 6155

Legal description –

Part Lot 77 and part Lot 78 on Plan 2903

Being the area bound by Latitude/Longitude points:
115.8910, -32.0739;
115.8931, -32.0758;
115.8874, -32.0777; and
115.8869, -32.0772

Date of Amendment 20/12/2017

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* (EP Act), 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.

Date signed 20 December 2017

Rebecca Kelly

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
Amendment Notice	refers to this document
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
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
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	Southern Metropolitan Regional Council

m ³	cubic metres
MS	Ministerial Statement
mtpa	million tonnes per annum
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 amendment notice is limited to only administrative changes. No changes to the aspects of the original licence relating to Category 61A and 67A 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)

Amendment description

The Regional Resource Recovery Centre (RRRC) is a waste composting facility operated by the Southern Metropolitan Regional Council (SMRC). The facility has been licensed under the *Environmental Protection Act 1986* since 2002. The RRRC is located in the City of Canning within the Canning Vale industrial area.

- This amendment was initiated by Southern Metropolitan Regional Council.
- *The amendment is to:*
 - *reduce duplication of conditions,*
 - *remove expired dates,*
 - *correction of clerical errors,*
 - *simplification of security conditions,*
 - *simplification of monitoring conditions,*
 - *simplification of failure conditions,*
 - *update to improvement condition,*
 - *align reporting dates to the financial year, and*
 - *reduce the frequency of reports.*

Amendment history

Table 2 provides the amendment history for L7799/2001/8.

Table 2: Licence amendments

Instrument	Issued	Amendment
L7799/2001/8	27 March 2015	Amendment to increase tonnage per year and remove the monthly limit of waste collected at the facility.

Decision

DWER intends to commence within the next six months a detailed risk review of the licence to align the licence with the DWER's risk-based regulatory framework. The full risk-based review will incorporate these amendments into the revised licence.

The Delegated Officer has determined that an administrative amendment is to be made to correct duplicate conditions, change the reporting dates and requirements, remove redundant conditions and dates within the licence. These changes are only administrative in nature and do not change the risk profile of the premises and, it does not change the requirements of any licence condition.

Appendix 2 details the requested amendments and the justification for the change.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice on 11 December 2017. Comments received from the Licence Holder have been considered by the Delegated Officer as shown in Appendix 3.

Amendment

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

CATEGORY	DESCRIPTION	CAPACITY
61A	Solid waste depot	No more than 52 000 tonnes per year

CATEGORY	DESCRIPTION	CAPACITY
61A	Solid waste <u>facility</u>	No more than 52 000 tonnes per year

2. Condition 2 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
 - 2 The Licensee shall not accept more than 109 200 tonnes of putrescible waste over a 12 month period, where the 12 month period commences on 1 ~~April~~ each year.
 - 2 The Licensee shall not accept more than 109 200 tonnes of putrescible waste over a 12 month period, where the 12 month period commences on 1 July each year.
3. Condition 3 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
 - 3 For the reporting period the licensee shall provide to the CEO by ~~22 November~~ each year an Annual Environmental Report (AER) containing data collected over the previous year, starting from ~~27 October to 26 October~~ the following year.
 - 3 For the reporting period the licensee shall provide to the CEO by 28 July each year an Annual Environmental Report (AER) containing data collected over the previous year, starting from 1 July to 30 June the following year.

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

4. The AER referred to in condition 3 shall contain but not be limited to:
- (a) monitoring data or other collected data required by any condition of this licence;
 - (b) an explanation of the monitoring results with respect to the environmental impacts of any discharges into the environment;
 - (c) a comparison of the monitoring results with monitoring results of previous years including an assessment of the data against any limits or targets set in this licence or other environmental guidelines or policies and data from previous years' monitoring;
 - (d) identifying any data exceeding any limits, targets, guidelines or policies and provide information on why the exceedance occurred (if known) and action taken by the licensee to prevent recurrence of such exceedances;
 - (e) the number and type of complaints received including the date of the complaint, the nature of complaint (where appropriate cross referenced with prevailing wind directions) and action(s) taken;
 - ~~(f) any changes to surface drainage channels;~~
 - (g) any on-site or off-site pollution impacts arising from activities within the Premises;
 - (h) measures taken to control pests and vermin;
 - ~~(i) number and severity of any fires within the Premises;~~
 - ~~(j) measures taken to suppress dust;~~
 - (k) measures taken to control windblown waste;
 - (l) the total amount of compost removed from the premises over the year;
 - (m) the throughput of waste per source and per type over the year;
 - (n) measures taken to further control odour emissions from the Premises;
 - ~~(o) any changes to the Premises boundaries, internal buffer zones, or location of groundwater monitoring bores;~~
 - ~~(p) the number and the details of non-conformances identified with the Premises' Environmental Management System;~~
 - ~~(q) audits and audit reports undertaken to assess compliance with the Premises' Environmental Management System;~~
 - (r) any issues raised by the Department of Environment Regulation Department of Water and Environmental Regulation (e.g. arising from inspections) during the reporting period should also be summarised together with details on how these have been addressed or rectified or, if the required work has yet to be completed, how and when they will be rectified or completed;
 - (s) any odour monitoring assessments undertaken to determine the performance and efficiency of the Pollution Control Devices used to control and mitigate odour emissions from the operations;
 - (t) details of any monitoring methods used to collect and analyse data required by any condition of this licence and information demonstrating that they comply with the methods specified in this licence, and
 - (u) provide a summary of all incidents involving discharges of chemicals or environmentally hazardous materials within and from the Premises.

5. Condition 5 of the Licence is amended by the deletion of the condition shown in strikethrough below:

~~5 The licensee shall ensure that only Putrescible Waste is accepted for composting at the Premises.~~

6. Condition 6 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

~~6. The licensee shall ensure the following procedures are in place for managing waste other than waste listed for acceptance in licence condition 5:~~
~~(a) where the licensee is notified or is aware of the acceptance of waste not permitted by this licence, the waste shall be inspected and identified for the potential level of hazard;~~
~~(b) where such loads are identified, record the nature of the load, the delivery vehicle's registration number, driver's name and volume delivered; and~~
~~(c) the information recorded or maintained in accordance with parts (a) and (b) of this condition shall be made available for viewing or copying by an Authorised Officer or Inspector during any inspection of the Premises.~~

6. The Licensee shall ensure that where waste does not meet the waste acceptance criteria set out in condition 2 it is removed from the Premises by the delivery vehicle or, where that is not possible, stored in a quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable.

7. Condition 10 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:

~~10. The licensee shall maintain a fence that is a minimum height of 1.8 metres around the whole perimeter of the Premises boundary as depicted in Attachment 2 to prevent public access to the Premises and to effectively control wind-blown waste.~~

10 The licensee shall:

- a) maintain a fence that is a minimum height of 1.8 metres around the whole perimeter of the Premises boundary to effectively control wind-blown waste as depicted in Attachment 2.
b) any entrance or exit at the Premises is securely locked when the Premises is unattended to prevent public access.

8. Condition 11 of the Licence is amended by the deletion of the condition shown in strikethrough below:

~~11 The licensee shall ensure that a daily inspection of the perimeter fence (and gates) referred to in condition 10 is undertaken and logged and that any damage to the fence (and gates) is repaired within one working day of its discovery.~~

9. Condition 12 of the Licence is amended by the deletion of the condition shown in strikethrough below:

~~12. The licensee shall ensure that any entrance or exit at the Premises is securely locked when the Premises is unattended.~~

10. Condition 16 of the Licence is amended by the insertion of the red text shown in underline below:
16. The licensee shall maintain a continuous monitoring system with an automated alarm system communicating to a central control room, for the purposes of continuously measuring temperature, relative humidity and pressure at the following locations:
- (i) in all humidifier and wet scrubber inlet gases;
 - (ii) in Biofilter 1, 2, 3 and 4 inlet gases, and
 - (iii) any other Pollution Control Equipment.
11. Condition 18 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
- ~~18. The licensee shall implement the Biofilter Management Plan dated 19 January 2015.~~
18. The licensee shall update the Biofilter Management Plan annually.
12. Condition 22 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
- ~~22. The licensee shall ensure that in the event of a failure or malfunction of any Pollution Control Equipment, the licensee shall inform the CEO within 24 hours of the cause and duration of the malfunction, remedies taken to rectify the problem and time of startup.~~
22. The licensee shall ensure that in the event of a failure or malfunction of any Pollution Control Equipment, the licensee shall:
- a) inform the CEO within 24 hours of the cause and duration of the malfunction.
 - b) notify the CEO of remedies taken to rectify the problem and time of startup.
 - c) take all reasonable and practical actions to cease any emissions of unreasonable odours when a failure or malfunction of the Pollution Control Equipment is detected.
 - d) ensure that if any Pollution Control Equipment is not rectified within 24 hours of detection and unreasonable odours are likely to be emitted, no further Putrescible Waste is to be accepted at the Premises until such time as the failure or malfunction has been rectified.
13. Condition 31 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
31. The licensee shall ensure that all liquid in the leachate storage tanks referred to in condition 30 that is not reused in the compost process is disposed of by:
- ~~(a) obtaining an Industrial Discharge Licence from Water Corporation prior to discharge into the sewerage system; or~~
 - (b) removed from the Premises via tanker by a licensed Controlled Waste Contractor to a treatment plant prior to discharge into the environment.

31. The licensee shall ensure that all liquid in the leachate storage tanks referred to in condition 30 that is not reused in the compost process is disposed of by:
- (a) the Water Corporation sewerage system; or
 - (b) removed from the Premises via tanker by a licensed Controlled Waste Contractor to a treatment plant prior to discharge into the environment.
14. Condition 35 of the Licence is amended by the deletion of the text shown in strikethrough below:
- 35 The licensee shall keep a written or electronic record of all incidents involving discharges of chemicals or environmentally hazardous materials within and from the Premises. ~~and provide a summary of each of these incidents to the CEO with the AER required by condition 3.~~
15. Condition 36 of the Licence is amended by the deletion of the text shown in strikethrough below:
36. The licensee shall manage the greenwaste stored in Area A in the following manner:
- (a) storage of no more than 1000 tonnes of greenwaste in Area A at any one time;
 - (b) removal of greenwaste from the premises within 10 days of receipt;
 - (c) storage of all mulched greenwaste within the shredder building as detailed in Attachment 2;
 - (d) processing the green waste material following a First In First Out process;
 - (e) retaining a record of total daily amount of green waste accepted and stored in Area A (as detailed in Attachment 2) and the total amount of mulched green waste sent offsite;
 - (f) a comparison of the amount of greenwaste recorded in part (e) of this condition to the maximum amount of greenwaste permitted to be stored onsite given in part (a) of this condition; and
 - ~~(g) make available on request by an Authorised Officer or Inspector all data required by this condition.~~
 - (h) Parts (a) and (b) of this condition do not apply to tree trunks and branches with a minimum diameter of 300 millimetres on which leaves or smaller branches are not attached.
16. Condition 37 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
37. The licensee shall implement the most current and approved version of the following Southern Metropolitan Regional Council Operational Procedures for the purposes of managing greenwaste accepted, processed and stored in Area A:
- (a) Standard Operational Procedure 001 - Greenwaste: Odour Monitoring and Control;
 - (b) Standard Operational Procedure 007 - ~~Greenwaste:~~ Greenwaste Stock Management;
 - (c) Procedure EOPG-1, Unloading, Loading and Storage of ~~Greenwaste~~ Green waste;
 - (d) Procedure EOPG-5, Control and Monitoring of Odour from ~~Greenwaste~~ Green waste Mulching Operation; and
 - (e) Procedure EOPG-~~5~~2, Processing of ~~Greenwaste~~ Green waste.

17. Condition 40 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
40. The licensee shall make available to an Authorised Officer or Inspector on request all data collected under ~~conditions 38 and 39~~ of this licence.
40. The licensee shall make available to an Authorised Officer or Inspector on request all data collected under any condition of this licence.
18. Condition 41 of the Licence is amended by the deletion of the text shown in strikethrough below and the insertion of the red text shown in underline below:
41. The licensee shall by 28 ~~November~~ July each year, provide to the CEO an Annual Audit Compliance Report in the form in Attachment 1 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the Premises, during the period beginning ~~27 October in the previous year and ending on 26 October in that year.~~ 1 July to 30 June the following year.
19. Condition 45(a) of the Licence is amended by the deletion of the text shown in strikethrough below:
- ~~45(a) The licensee shall submit to the CEO a Quarterly Compliance Report that will detail for the previous quarter:~~
- ~~(a) the total daily amount of accepted green waste material, the daily amount of mulched material removed offsite and show the trend of the daily total amount of mulch and green waste on site;~~
 - ~~(b) a summary of the information contained in the complaints register detailed in condition 42;~~
 - ~~(c) monthly throughput of putrescible waste accepted for composting for the previous quarter;~~
 - ~~(d) the total amount of composting material stored in the aeration building at the end of each month as detailed in condition 47;~~
 - ~~(e) the total amount of composted material removed off site each month;~~
 - ~~(f) the monitoring data required by conditions 38 and 39 of this licence for the quarter;~~
 - ~~(g) a comparison of the monitoring data required by conditions 38 and 39 of this licence against the limits and targets in this licence, the previous quarters data and details on the operations during the sampling event;~~
 - ~~(h) the exceedance investigation reports required to be submitted in condition 17(c), and;~~
 - ~~(i) the outcomes of the ambient odour assessments required by condition 19 conducted during the quarter.~~
20. Condition 45(b) of the Licence is amended by the deletion of the text shown in strikethrough below:
- ~~45(b) The licensee shall submit the quarterly compliance reports required by condition 45(a) within 28 days after the completion of each quarter.~~
21. Condition 46 of the Licence is amended by the deletion of the text shown in strikethrough below:

~~46. The licensee shall maintain a record of the daily total amounts of putrescible waste accepted onto the premises for composting.~~

Appendix 1: Key documents

	Document title	In text ref	Availability
1	Licence L7799/2001/8 – Southern Metropolitan Regional Council	L7799/2001/8	accessed at www.dwer.wa.gov.au
2	DER, July 2015. <i>Guidance Statement: Regulatory Principles</i> . Department of Environment Regulation, Perth.	DER 2015a	accessed at www.dwer.wa.gov.au
3	DER, October 2015. <i>Guidance Statement: Setting Conditions</i> . Department of Environment Regulation, Perth.	DER 2015b	
4	DER, November 2016. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	DER 2016b	
5	DER, November 2016. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	DER 2016c	

Appendix 2: Proposed amendments and reason for change

Condition	Existing Condition	Proposed Condition Change	Reason for Change
Prescribed Premises Category	Category 61A - Solid Waste Depot	The prescribed premises category description for category 61A is requested to be updated to 'Solid waste facility'.	To align the prescribed premises category with the Environmental Protection Regulations 1987.
General Conditions			
2	The Licensee shall not accept more than 109,200 tonnes over a 12-month period, where the 12 month period commences on 1st April of each year.	Change acceptance period to 1 July to 30 June to coincide with the financial year reporting.	To align tonnage acceptance and Annual Reporting periods within the licence. Aligning the tonnage acceptance and Annual Reporting periods will allow for better comparisons of previous years' data, for tonnage in and out, consultant reports. It will also align to the business management system.
3	For the reporting period the licensee shall provide to the CEO by 22 November each year and Annual Environment Report (AER) containing data collected over the previous year, starting from 27 October to 26 October the following year.	Change submission date of the Annual Environmental Report to 28th July and the reporting period to start from 1 July to 30 June the following year.	To align tonnage acceptance and Annual Reporting periods within the licence.
4 (f)	The AER referred to in condition 3 shall contain but not be limited to: any changes to surface drainage channels;	The RRRC requested that this condition is removed.	The site is in a static state and no changes to surface drainage channels are anticipated. Drains are inspected once per week.
4 (i)	Number and severity of any fires	The RRRC requested that this condition is removed.	Duplicate reporting condition: Significant fires will be captured under Section 72 of the <i>Environmental Protection Act 1986</i> .
4 (j)	Measures taken to suppress dust	The RRRC requested that this condition is removed.	All site Waste Collection Facility activities are undertaken in enclosed buildings and the building is under negative pressure. Dust generated inside the building is collected by humidifiers before reaching the bio filters.
4 (o)	any changes to the Premises boundaries, internal buffer zones, or location of groundwater monitoring bores	The RRRC requested that this condition is removed.	The premises boundaries are set as per the sites Certificate of Title agreement with the City of Canning. The site is in a static state and no changes to the boundary are anticipated.
4 (p)	The number and the details of non-conformances identified with Premises' Environmental Management System.	The RRRC requested that this condition is removed.	The Premises' Environmental Management System has been certified to ISO 14001 Standards and is externally audited every year by a 3rd Party representative SAI Global. The EMS is a requirement of Ministerial Statement 517 conditions 3.1 and 3.2.
4 (q)	Audits and audit reports undertaken to assess compliance with the Premises Environmental Management System	The RRRC requested that this condition is removed.	The Premises' Environmental Management System has been certified to ISO 14001 Standards and is externally audited every year by a 3rd Party representative SAI Global. The EMS is a requirement of Ministerial Statement 517 conditions

Condition	Existing Condition	Proposed Condition Change	Reason for Change
			3.1 and 3.2.
5	The licensee shall ensure that only Putrescible Waste is accepted for composting at the Premises.	Proposed merging condition 5 with condition 2 or remove condition 5.	Merged condition 5 with condition 2 and removed condition 5 as both conditions describe the Premises is to ensure only Putrescible Waste is accepted.
6	The licensee shall ensure the following procedures are in place for managing waste other than waste listed for acceptance in licence condition 5: (a) where the licensee is notified or is aware of the acceptance of waste not permitted by this licence, the waste shall be inspected and identified for the potential level of hazard; (b) where such loads are identified, record the nature of the load, the delivery vehicle's registration number, driver's name and volume delivered; and (c) the information recorded or maintained in accordance with parts (a) and (b) of this condition shall be made available for viewing or copying by an Authorised Officer or Inspector during any inspection of the Premises.	Proposed to update this condition to current DWER practices. This condition is also part of the RRRC's management system.	Condition updated to the most recent and relevant one. Any load identified as non-compliant with waste acceptance criteria is recorded as excluded waste as per internal RRRC's procedure EOPW-3/EOPG-3 and removed to an appropriate disposal facility.
10	The licensee shall maintain a fence that is a minimum height of 1.8 metres around the whole perimeter of the Premises boundary as depicted in Attachment 2 to prevent public access to the Premises and to effectively control wind-blown waste.	Proposed merging Condition 10 with Condition 12	Condition 10 and Condition 12 refer to the security of the Premises and have been merged into condition 10.
11	The licensee shall ensure that a daily inspection of the perimeter fence (and gates) referred to in condition 10 is undertaken and logged and that any damage to the fence (and gates) is repaired within one working day of its discovery.	The RRRC requested this condition is removed.	Removed this condition as it relates to a Landfill premises boundary inspection.
12	The licensee shall ensure that any entrance or exit at the Premises is securely locked when the Premises is unattended.	Proposed merging Condition 12 with Condition 10	Condition 12 and Condition 10 refer to the security of the Premises. Merged with condition 10.

Condition	Existing Condition	Proposed Condition Change	Reason for Change
Emissions to Air			
16	The licensee shall maintain a continuous monitoring system with an automated alarm system communicating to a central control room, for the purposes of continuously measuring temperature, relative humidity and pressure at the following locations: (i) in all humidifier and wet scrubber inlet gases; and (ii) in Biofilter 1, 2, 3 and 4 inlet gases.	Proposed merging condition 16 with condition 23	Duplicate of condition 23. Merged 16 and 23 together.
18	The licensee shall implement the Biofilter Management Plan dated 19 January 2015.	Administrative Change: removing "dated 19 January 2015"	The Biofilter Management Plan is updated annually.
22	The licensee shall ensure that in the event of a failure or malfunction of any Pollution Control Equipment, the licensee shall inform the CEO within 24 hours of the cause and duration of the malfunction, remedies taken to rectify the problem and time of start-up.	Proposed merging condition 22 with condition 24 and condition 25	Merged condition 22, 24 and 25 together as there was duplicate requirements for notification and cessation of operations for any failure of equipment.
23	The licensee shall operate and maintain a system to detect failures in the Pollution Control Equipment in real time.	Proposed merging condition 16 with condition 23	Duplicate of condition 16. Merged 16 and 23 together.
24	The licensee shall take all reasonable and practical actions to cease any emissions of unreasonable odours when a failure or malfunction of the Pollution Control Equipment is detected.	Proposed merging condition 24 with condition 22 and condition 25	Merged condition 22, 24 and 25 together as there was duplicate requirements for notification and cessation of operations for any failure of equipment.
25	The licensee shall ensure that in the event that the failure or malfunction of any Pollution Control Equipment is not rectified within 24 hours of detection and unreasonable odours are likely to be emitted, no further Putrescible Waste is to be accepted at the Premises until such time as the failure or malfunction has been rectified.	Proposed merging condition 25 with condition 22 and condition 24	Merged condition 22, 24 and 25 together as there was duplicate requirements for notification and cessation of operations for any failure of equipment.

Condition	Existing Condition	Proposed Condition Change	Reason for Change
Discharge to Water			
31	The licensee shall ensure that all liquid in the leachate storage tanks referred to in condition 30 that is not reused in the compost process is disposed of by: (a) obtaining an Industrial Discharge Licence from Water Corporation prior to discharge into the sewerage system; or (b) removed from the Premises via tanker by a licenced Controlled Waste Contractor to a treatment plant prior to discharge into the environment	Administrative Change: Remove the requirement to "(a) obtain a discharge licence from Water Corporation prior to"	Compliance obligations have been met. RRRC has obtained a discharge licence from the Water Corporation on 13th June 2013.
Waste Storage			
35	The licensee shall keep a written or electronic record of all incidents involving discharges of chemicals or environmentally hazardous materials within and from the Premises and provide a summary of each of these incidents to the CEO with the AER required by condition 3.	Proposed variation to condition 35	Split condition 35, by placing; "provide a summary of each of these incidents to the CEO with the AER required by condition 3." into Condition 4 as a sub condition.
36(g)	make available on request by an Authorised Officer or Inspector all data required by this condition.	Request to remove or amend Condition 36(g) and Condition 40	Condition 40 mirrors Condition 36(g). Merged Condition 36(g) and Condition 40 to represent the whole licence
37(b)	The licensee shall implement the most current and approved version of the following Southern Metropolitan Regional Council Operational Procedures for the purposes of managing greenwaste accepted, processed and stored in Area A: (b) Standard Operational Procedure 007 - Greenwaste: Greenwaste Stock Management	Correction of clerical mistake	Condition 37(b) has a repeated words; (Green waste) (b) Standard Operational Procedure 007 - Green waste: Green waste Stock Management
37	The licensee shall implement the most current and approved version of the following Southern Metropolitan Regional Council Operational Procedures for the purposes of managing green waste accepted, processed and stored in Area A: 37(a) Standard Operational Procedure 001 – Green waste: Odour Monitoring and Control 37(b) Standard Operational Procedure 001 – Green waste: Green waste Stock Management;	a) No changes are requested b) Removed duplicate Green waste	Condition 37(c) has wrong procedure Title; Procedure EOPG-1 Unloading, Loading and Storage of Green waste It Should read; EOPG-1 Unloading, Loading and Storage of Green waste Condition 37(d) has wrong procedure Title; Procedure EOPG-1 Unloading, Loading and Storage of Green waste It Should read; EOPG-5, Control and Monitoring of Odour from Green waste Mulching Operation; and Condition 37(e) has wrong procedure number(EOPG-5) and title; (e) Procedure EOPG-5 Processing of Green waste

Condition	Existing Condition	Proposed Condition Change	Reason for Change
	37(c) Procedure EOPG-1 Unloading, Loading and Storage of Green waste 37(d) Procedure EOPG-5, Control and Monitoring of Odour from Green waste Mulching Operation; and 37(e) Procedure EOPG-5 Processing of Green waste	c) Correction of clerical mistake d) Correction of clerical mistake e) Correction of clerical mistake	should read; (e) EOPG-2 Processing of Green waste
Monitoring Conditions			
40	The licensee shall make available to an Authorised Officer or Inspector on request all data collected under conditions 38 and 39 of this licence	RRRC requests that Condition 40 and Condition 36(g) is removed or amended.	Condition 40 mirrors Condition 36(g). Merged Condition 36(g) and Condition 40 to represent the whole licence
Reporting Conditions			
41	The licensee shall by 28 November each year, provide to the CEO an Annual Audit Compliance Report in the form in Attachment 1 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the Premises, during the period beginning 27 October in the previous year and ending on 26 October in that year.	The RRRC requested that the submission date of the Annual Audit Compliance Report is changed to 28th July and the reporting period to 1 July to 30 June of the following year.	To align tonnage acceptance and Annual Reporting periods within the licence. To also align with the financial year.
45(a)	The licensee shall submit to the CEO a Quarterly Compliance Report that will detail for the previous quarter:	Proposed removing quarterly compliance reports.	This condition has been reduced from monthly to quarterly compliance reports based on the improved performance of the plant in 2014. Condition 45(a) has been removed as plant performance has further improved and annual reports are now required.
45(b)	The licensee shall submit the quarterly compliance reports required by condition 45(a) within 28 days after the completion of each quarter.	Proposed removing quarterly compliance reports.	This condition has been reduced from monthly to quarterly compliance reports based on the improved performance of the plant in 2014. Condition 45(a) has been removed as plant performance has further improved and annual reports are now required.
46	The licensee shall maintain a record of the daily total amounts of putrescible waste accepted onto the premises for composting	Requested to remove or merge Condition 46 with Condition 4.	Condition 4 already covers this condition therefore it has been deleted. The RRRC keeps a daily record of the incoming waste material to the composting facility for financial purposes. These records are available on request at any time to the DWER.

Appendix 3: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice on 11 December 2017 for review and comment. The Licence Holder responded on 15 December 2017 waiving the remaining comment period until 3 January 2017. The following comments were received on the draft Amendment Notice.]

Condition	Summary of Licence Holder comment	DWER response
37(c), (d) & (e)	Confirmed correct procedure titles	Accepted and confirmed conditions