



Licence Number	L8757/2013/1
Licence Holder	Eco Resources Pty Ltd
ACN	148 991 315
Registered business address	Suite 18, 7 The Esplanade MOUNT PLEASANT WA 6153
Date of amendment	22 February 2017
Prescribed Premises	Category 13: Crushing of building material; Category 57: Used tyre storage; Category 62: Solid waste depot.
Premises	Eco Resources Recycling Transfer Station Postans Road, HOPE VALLEY WA 6165 Being Part of Lots 571 and 572 on Plan 3475

Amendment

The Chief Executive Officer (CEO) of the Department of Environment Regulation (DER) has amended the above licence in accordance with section 59 of the *Environmental Protection Act 1986* as set out in this Amendment Notice.

Date signed: 22 February 2017

Steve Checker

MANAGER LICENSING (WASTE INDUSTRIES)

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

Amendment Notice

This notice is issued under 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.

Amendment Description

An amendment application was received by DER on 20 December 2016 from the Licence Holder requesting the removal of waste storage requirements in condition 1.2.8 / Table 1.2.2; specifically:

- Process limit (k): Wastes (excluding Inert Waste Type 1, green waste and tyres) must be stored within an enclosed bin

Grounds: Recyclables have never been stored in enclosed bins, but are kept contained in a sheltered location.

- Process limit (o): Unprocessed green waste shall be removed from the premises within 4 weeks of being received at the Premises

Grounds: Requirement is unrealistic given constant movement and processing of greenwaste resulting in the area never being full cleared of greenwaste.

- Process limit (p): All mulched green waste shall be removed from the Premises within one week of being shredded, or before the close of business every Friday, whichever occurs first.

Grounds: Requirement is unrealistic given constant movement and processing of greenwaste resulting in the area never being full cleared of greenwaste.

The above conditions were added to the Licence via a previous amendment (28 April 2016) which included a significant increase in the amount of green waste stored on the Premises and a general review of the format of the existing licence conditions.

The Licence Holder provided the following information on the storage of wastes on the Premises in support of this amendment application:

Wastes stored inside bins:

1. Steel inside 25m open top hook lift bins.
2. Stainless Steel inside 10m open top moral bins
3. Copper inside 2m open top moral bins.
4. Light fraction mix of paper/plastic inside 25m enclosed caged bin (situated at end of air blower)

Wastes stored in bays:

1. Timber
2. Bricks
3. Steel
4. Oversize concrete
5. Unrecyclable waste (for landfill)

Waste in open air storage (recycled concrete hardstand):

1. *Stockpile to be sorted*
2. *Stockpile to be transport to landfill*
3. *Recycled Sand Stockpile*
4. *Concrete*
5. *Bricks*
6. *Greenwaste*
7. *Tyres*
8. *Paper/Cardboard (Stored in an undercover area – under a steel dome, surrounded by sea containers).*

A risk assessment has been completed for the relevant activities on the Premises, assuming the amendment request is granted. This is detailed in Table 1 below.

Risk Assessment

Table 1 – Risk assessment for the proposed amendments

Activity	Potential emission	Potential receptors	Potential pathway	Potential impacts	Material risk	Reasoning
Category 62: Exposed storage of some recyclables	Windblown waste: primarily from light waste (recovered paper and cardboard)	Residential receptors Closest residents approximately 530m east and approximately 750m north east of the Premises.	Air/wind	Amenity	Yes	<p>Emissions of windblown waste due to storage of recyclables outside of enclosed bins could have a moderate consequence (mid-level impact to amenity) if it was to reach receptors; however there is a rare likelihood of this occurring given the following Licence Holder controls:</p> <ul style="list-style-type: none"> Wastes stored openly or within concrete bays is heavy (i.e. timber, bricks, steel, concrete, tyres, greenwaste, mixed stockpiles for sorting). Lightest fraction of paper/plastic is stored inside a 25m enclosed caged bin. Paper/cardboard are baled and stored under a steel dome and sheltered by sea containers. Fencing at around site to trap windblown waste reaching gates inside the Premises. Secondary fencing and bund walls at Premises boundary. <p>The nearest receptors are east and northeast of the Premises; however a buffer of vegetation approximately 100m in depth exists on the adjacent land to the east and northeast, further reducing the likelihood of windblown waste ever reaching receptors.</p> <p>The Delegated Officer considers that the overall risk to amenity of windblown waste as a result of the open storage of some recyclables is Medium. The licence already contains a condition requiring the height of stockpiles of waste to be limited to 5m or less, and for all reasonable measures to ensure windblown waste doesn't escape the Premises boundary.</p> <p>The Delegated Officer considers the requirement for all wastes (excluding Inert Waste Type 1, green waste and tyres) to be stored in enclosed bins can be removed from condition 1.2.8 as per the Licence Holders amendment request, providing the following additional regulatory controls (as derived from the Licence Holder's own commitments above) are added:</p> <ul style="list-style-type: none"> Light fraction paper/plastic must be stored inside an enclosed

						<p>caged bin.</p> <ul style="list-style-type: none"> Paper/cardboard must be baled and stored in a sheltered location that is not exposed to wind.
Category 62: Extended storage of green waste	Contaminated stormwater: storage of decaying greenwaste	Groundwater quality <p>Approximately 19m below ground level in limestone sands. Greenwaste is stored on a compacted hardstand of recycled roadbase</p>	Infiltration through soil	Environment	Yes	<p>The extended storage of raw greenwaste beyond 4 weeks and mulched greenwaste beyond 1 week could have a minor consequence to the environment, through minimal off-site impacts to groundwater on a local scale. The likelihood of this consequence is considered by the Delegated Officer to be unlikely, given the distance to groundwater, storage on a compacted hardstand and the negligible potential for any leachate to be generated over the summer periods.</p> <p>The Licence Holder has the following controls in place for the storage of greenwaste:</p> <ul style="list-style-type: none"> Greenwaste is stored on a compacted hardstand of recycled road base. No more than 400m³ of greenwaste is stored at any time. Continuous movement and processing of greenwaste. Stormwater runoff from the mulched and un-mulched green waste storage is collected in a sump lined with a 100mm layer of compacted recycled road base. <p>The Delegated Officer considers that the overall risk to the environment from the extended storage of greenwaste on the Premises is Medium.</p> <p>The Licence already has a condition restricting the storage of greenwaste to 400m³. Considering this and the constant movement and processing of greenwaste by the Licence Holder, the Delegated Officer considers that removing the maximum storage duration conditions for greenwaste should not pose an unacceptable risk to the environment.</p>
	Odour: associated with the decay of greenwaste	Residential receptors <p>Closest residents approximately 530m east and approximately 750m north east of the Premises.</p>	Air/wind	Amenity	Yes	<p>The Delegated Officer considers that the extended storage of raw greenwaste could have a minor consequence, through low-level impacts to amenity (low number of receptors) from the odour emissions which are likely to arise if decayed greenwaste is disturbed. The Delegated Officer considers that the likelihood of this impact to amenity occurring is unlikely. Despite the proximity of the nearest residence (530m) to the east of the Premises and the location of greenwaste storage being on the easternmost portion of the Premises, the continuous processing of greenwaste at the Premises reduces the likelihood of any greenwaste sitting stationery for extended periods of time. It is also noted that there are no records of odour</p>

						<p>complaints on DER's record for this Premises.</p> <p>The Licence Holder has the following controls in place for the storage of greenwaste:</p> <ul style="list-style-type: none"> • No more than 400m³ of greenwaste is stored at any time. • Continuous movement and processing of greenwaste. • Stockpiles of waste shall not exceed 5m in height. <p>The Delegated Officer considers that the overall risk to amenity related to odour from the extended storage of greenwaste on the Premises is Medium.</p> <p>The Licence already has a condition restricting the storage of greenwaste to 400m³, a limit on the stockpile height of 5m, and the requirement to maintain a complaints management system. The Delegated Officer considers that the risk of odour emissions from the extended storage of greenwaste at the Premises is adequately addressed by these conditions. Emissions of unreasonable odour can also be regulated by the general provisions of the EP Act.</p> <p>Should odour issues arise in future resulting in complaints, the risk rating for this activity may be reviewed by the Delegated Officer and further controls considered.</p>
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Decision

Following the risk assessment in Table 1, the Delegated Officer considers that the Licence Holder's request for the removal of conditions for the storage of all recyclable wastes within enclosed bins and conditions setting maximum storage times for greenwaste can be granted without unreasonable risk posed to the environment or public amenity.

The removal of these conditions is subject to the addition of controls for the management of windblown wastes as set out in the Amendment section below.

Amendment History

Instrument	Issued	Amendment
L8757/2013/1	10/07/2013	New premises licence
L8757/2013/1	11/11/2015	Licence amendment Production/design capacity increase and increase in tyre storage
L8757/2013/1	28/04/2016	Licence amendment Change to premises boundary, increase in green waste storage and addition of Category 13: Crushing of building material.
L8757/2013/1	22/02/2017	Amendment Notice 1 Review of waste storage conditions

Amendment

1. Condition 1.2.8 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:

1.2.8 *The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the process(es) set out in Table 1.2.2 and in accordance with any process limits described in that Table.*

Table 1.2.2: Waste processing		
Waste type	Process	Process limits
Inert Waste Type 1	Receipt, handling, sorting (mechanical and hand), baling, shredding, crushing and/or storage prior to removal off site	(a) Waste shall only be accepted at the Premises at the Tip Off Bay prior to sorting and separation;
Inert Waste Type 2		(b) Loads shall be wet down during unloading at the tip off bay;
Green waste		(c) Loads should be thoroughly spread out and checked for any unauthorised contamination prior acceptance and further sorting and processing;
Cardboard and paper		(d) Only cardboard, paper or plastic shall be baled; and
Scrap metal		

		<p>(e) <i>The shredder and crusher shall not be operated simultaneously when the shredder is working in the eastern location of the Premises indicated (by the label "shredder") on the Site Plan in Schedule 1.</i></p> <p>Crushing</p> <p>(f) <i>Only concrete and brick may be crushed; and</i></p> <p>(g) <i>The crusher may only operate:</i></p> <ul style="list-style-type: none"> (i) <i>for 15 hours per week between the hours of 7:00am to 5:00pm Monday to Friday and 7:00am to 1:00pm Saturday; and</i> (ii) <i>when the plants inbuilt dust suppression system is operating; and</i> (iii) <i>in the location indicated in the Site Plan is Schedule 1.</i> <p>Shredding</p> <p>(h) <i>Waste unable to be readily sorted or recycled due to size/quality may be shredded prior to being sorted through the picking station;</i></p> <p>(i) <i>Shredding shall only occur when the shredder's inbuilt dust suppression system is operating; and</i></p> <p>(j) <i>The shredder must only operate in the locations indicated in the Site Plan in Schedule 1 (by the label "shredder"). The shredder shall only operate at the eastern location when shredding green waste. When operating in the western location, the shredder must be positioned either adjacent to sea containers to the east and south of the shredder, or adjacent to the incoming waste stockpile to the east of the shredder to help mitigate noise emissions.</i></p> <p>Storage</p> <p>(k) <i>Wastes (excluding Inert Waste Type 1, green waste and tyres) must be stored within an enclosed bin.</i></p> <p>(k) <u><i>Light fraction paper and plastics must be stored inside an enclosed caged bin;</i></u></p> <p>(l) <u><i>Paper (with exception to paper referred in (k) above) and cardboard must be baled and stored in a sheltered location that is not exposed to wind;</i></u></p> <p>(m) <i>Crushed material shall only be stored within an area provided with dust control sprinkler systems;</i></p> <p>(n) <i>Not more than 200m³ of un-mulched green waste is to be stored at the Premises at any one time;</i></p>
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		<p>(o) Not more than 200m³ of mulched green waste is to be stored at the Premises at any one time;</p> <p>(o) Unprocessed green waste shall be removed from the premises within 4 weeks of being received at the Premises.</p> <p>(p) All mulched green waste shall be removed from the Premises within one week of being shredded, or before the close of business every Friday, whichever occurs first.</p> <p>(p) Stockpiles of received or processed waste/material on the Premises shall not exceed 5 metres in height;</p> <p>(q) Not more than 200 tyres to be stored on the Premises at any one time; and</p> <p>(r) Used tyres shall be;</p> <ul style="list-style-type: none"> (i) stored at least 6 metres from any combustible material, wall, building or fence; (ii) stored stacked on their sides or if stored upright on their treads, are baled together with a securing device made from non-combustible material; and (iii) removed from the Premises within 48 hours of being received at the Premises.
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