Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Licence

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

Licence Number	L2833/2025/1
Applicant	Dodd & Dodd Group Pty Ltd
ACN	009 238 671
File number	APP-0026340
Premises	C.D. Dodd – Kalgoorlie Scrap Metal Facility Lot 21 Coath Road Kalgoorlie West WA 6430 Legal description - Lot 21 on Plan 18892 Certificate of Title Volume 1956 Folio 689
Date of report	10 July 2025
Decision	Licence granted

Abbie Crawford

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Date: 2025.07.10 11:07:35 +08'00'

Abbie Crawford
Manager, Waste Industries

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

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L2833/2025/1 has been granted.

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 01 November 2024, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application seeks a licence relating to the operation of a category 47: scrap metal recycling facility and a category 62: solid waste depot at the premises. The premises is in a zoned industrial area approximately 860 m north-east of West-Kalgoorlie residential area.

A site visit was conducted by DWER Assurance on the 11 July 2024 which was prompted by a complaint received by the City of Kalgoorlie-Boulder on 22 April 2024. The applicant was recommended to apply for a licence under the EP Act. The premises has been in operation without a licence since 2008. The applicant specialises in mine site decommissioning, site clean ups, battery recycling and commercial scrap metal recycling.

The premises accepts the following materials:

- Machinery
- Drill rods
- Light gauge (mixed) scrap
- Heavy gauge steel
- Non-ferrous metals
- Depolluted car bodies
- Lead acid batteries
- Scrap metal from mixed construction and demolition waste

Scrap metal is processed onsite predominantly through the use of hydraulic shears mounted on excavator booms and/or oxy-cutting. Bulk scrap metal (ferrous and non-ferrous) is stored in the external yard. Smaller, higher value scrap metals are stored in containers in the workshop area. Ferrous and non-ferrous metals are exported internationally for recycling. Batteries are recycled in Perth/interstate and tyres are recycled in Perth. Several intermediate bulk containers (IBCs) are stored on site to store small amounts of liquids e.g. oils or hydrocarbons, discovered in accepted scrap metal waste.

The premises relates to the categories and assessed production / design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L2833/2025/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L2833/2025/1.

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 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Dust Windblown waste	Operation of a scrap metal recycling facility Stockpiling of scrap metal Traffic movement and deliveries	Air / windborne pathway	• Wet down roads as required to minimize dust emissions • Vehicle speed restricted on site as necessary • Dust generating activities modulated according to weather conditions • Visual inspections of work areas undertaken daily • Concrete floor and hardstand area swept daily • Dust suppressant/surface stabilisation materials used, if required.
Asbestos	Acceptance of scrap metal (depolluted car bodies and brake pads)	Air / windborne pathway	• None proposed
Noise and vibration	Operation of a scrap metal recycling facility Traffic movement and deliveries	Air / windborne pathway	• Mobile plant fitted with broadband reversing alarms • Mobile plant maintained in accordance with the manufacturers specifications • Operated in a manner that ensures related noise emissions comply within the *Environmental Protection* (Noise) *Regulations 1997*
Contaminated	Storage of lead batteries and other	Overland flow and	• Limits of acceptance of environmentally

Emission	Sources	Potential pathways	Proposed controls
stormwater	hazardous waste Stockpiling of scrap metal	subsurface seepage	hazardous liquids • Batteries stored wrapped on pallets on concrete hardstand area • Concrete hardstand maintained free of leaks and defects • Stormwater contained on site, where practicable • Clean stormwater from workshop roof and concrete hardstand area diverted away from scrap metal storage areas. • Liquid residue (e.g. oils and hydrocarbons) discovered in accepted scrap metal collected and stored on site.
Spill of environmentally hazardous liquids	Storage of lead batteries and other hazardous waste	Overland flow and subsurface seepage	• Fuel (diesel) stored in self-bunded tank in workshop on concrete hardstand area • Batteries stored wrapped on pallets on concrete hardstand area • Liquid residue (e.g. oils and hydrocarbons) discovered in accepted scrap metal collected and stored on site. • Environmentally hazardous liquids stored in impermeable containers in workshop or on hardstand area • Spill kits maintained on site • Spill response procedure for chemical, fuel or oil spills • Environmentally hazardous liquids stored in impermeable containers in workshop or on hardstand area
Firefighting wash-water	Upset conditions (fire) resulting from: Oxy-cutting Scrap metal stockpiling	Air / windborne pathway	• Stormwater/firefighting water is managed on-site using known low points within the stockpile area and basins as marked on the attached plan. • Stormwater/firefighting water from the scrap metal storage areas collects in the low points in the yard, which are kept clear.
Toxic gas, smoke, odour	Upset conditions (fire) resulting from: Oxy-cutting Scrap metal stockpiling Storage of tyres	Air / windborne pathway	• Oxy-cutting ceased if smoke observed crossing the premises boundary • Where practicable, all non-metal surface coatings (including but not limited to plastic, resin, paint, rubber, concrete, synthetic coatings) are removed from the work surface of a scrap metal item, prior to cutting

Emission	Sources	Potential pathways	Proposed controls
			• Temporary screens used where possible • Oxy-cutting not to occur within 10 m of any flammable materials • Prior to any oxy-cutting activities, the area is wetted down to reduce the risk of ignition from sparks and/or molten metal • Oxy-cutting area is kept free of combustible materials, including vegetation and organic litter • Any combustible materials that cannot be removed are covered using suitable guards or material during cutting activities • Onsite fire management and prevention equipment, including but not limit to: -Fire hydrant and hose reel -Mobile water trailer -Fire extinguishers • All onsite fire management and prevention equipment maintained in good working order. • Tyres stacked in skip bins or containers • Less than 100 tyres stored on site at any one time

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 2 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Industrial premises	• Adjacent to the premises on the north, west, and south
Residential premises	• 840 m north-east of premises boundary • 1.27 km east of premises boundary
Kalgoorlie Gas Turbine Station	• 115 m west of premises and fuel unloading bays 275 m north-west of premises
Environmental receptors	**Distance from prescribed activity**
Native vegetation	• 44 m south-west of premises boundary • 230 m south-east of premises boundary
Threatened and Priority Flora	• South-west of premises boundary
Seasonal Minor Surface Water Line	• 645 m south of premises boundary
RIWI Groundwater area	• Located on the Goldfields Groundwater Area
Underlying groundwater (non-potable purposes)	• Unknown distance to groundwater – described as shallow/moderate

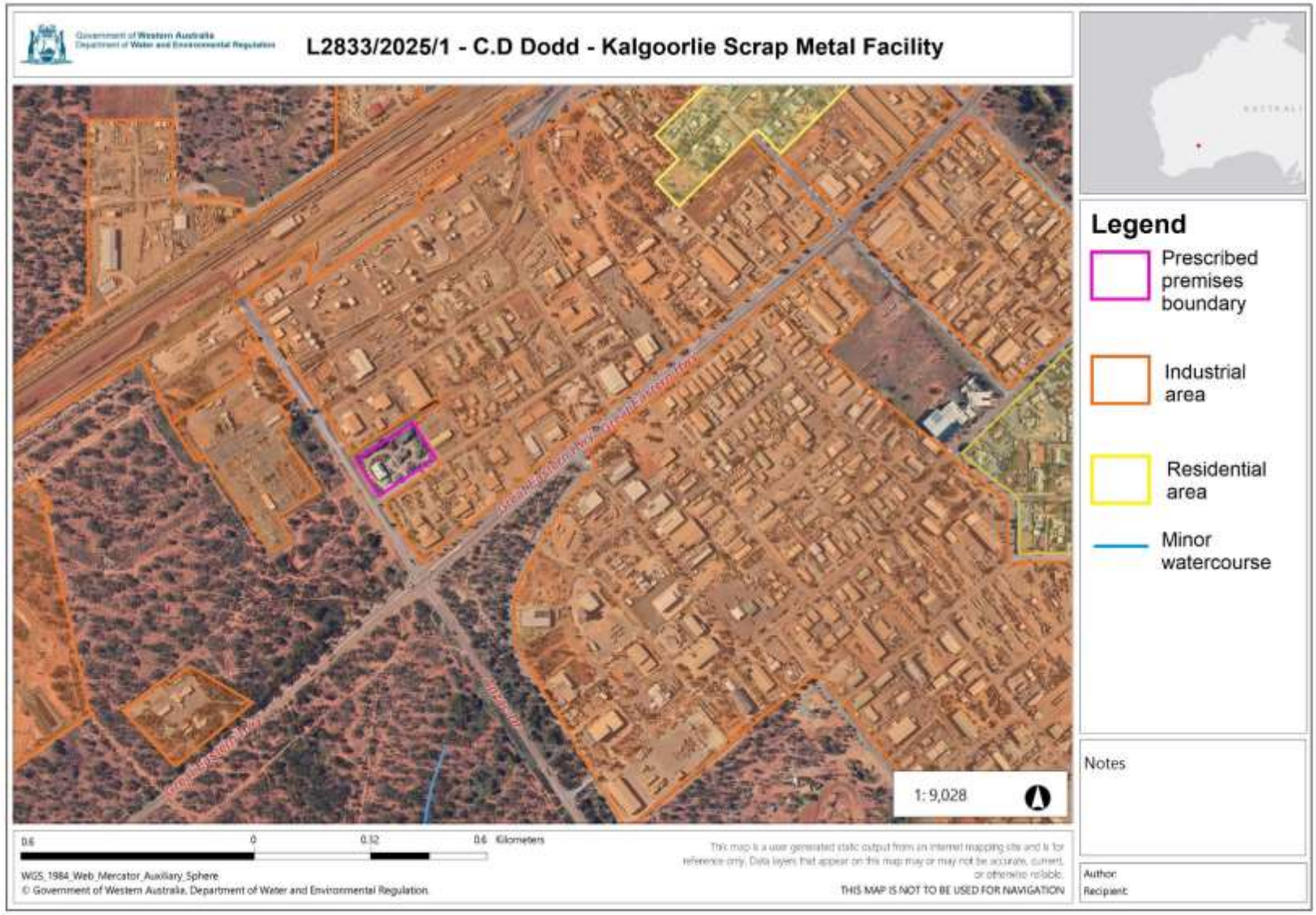

Figure 1: Distance to sensitive receptors

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 3.

Licence L2833/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e. scrap metal recycling facilities.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 3: Risk assessment of potential emissions and discharges from the premises during operation

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**				
Operation								
Operation of a scrap metal recycling facility Acceptance and storage of scrap metal Traffic movements and deliveries	Dust Windblown waste	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	• Industrial premises adjacent to the premises • Residential premises 840 m north-east and 1.27 km east of premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Condition 1, 2, 5 **Condition 14**	The delegated officer notes the dust complaints received by the City of Kalgoorlie-Boulder and has added standard condition 14, and limits stockpile height to 5 m to address potential dust lift off. Fencing infrastructure has also been conditioned which supports the capture of windblown waste within the premises boundary.
	Noise and vibration	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	• Industrial premises adjacent to the premises • Residential premises 840 m north-east and 1.27 km east of premises boundary	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	N	Condition 1 **Conditions 9, 10, 11**	The delegated officer notes the proximity to nearby industrial premises and therefore has conditioned an acoustic assessment of the premises to ensure they comply with the *Environmental Protection (Noise) Regulations 1997* (condition 9,10,11). The premises daily operations also must comply with the Noise Regulations.
	Asbestos	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	• Industrial premises adjacent to the premises • Residential premises 840 m north-east and 1.27 km east of premises boundary	Refer to Section 3.1	C = Severe L = Rare **High Risk**	N	**Conditions 1, 3, 4, 5**	The delegated officer considers the risk of receiving asbestos waste (e.g. brake pads) in waste accepted. Signage requirements have been added noting "No Asbestos" and standard waste processing requirements noting that any material suspected of containing asbestos or ACM must be removed prior to further processing.
Operation of a scrap metal recycling facility Acceptance and storage of scrap metal Storage of lead acid batteries and other hazardous waste	Contaminated stormwater	**Pathway:** Overland flow and subsurface seepage **Impact:** human health, soil and groundwater quality	• Industrial premises adjacent to the premises • Native vegetation 44 m south-west and 230 m south-east of premises • Seasonal minor surface water line 645 m south of premises	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Condition 1 **Conditions 3, 4, 6, 12, 13**	The delegated officer has taken into account the low average rainfall of the Kalgoorlie area and notes that any residual liquid waste will be removed from scrap metal. Condition 3 and 4 have been added to regulate waste acceptance and ensure that non-conforming waste is recorded and rejected. Standard conditions relating to waste and stormwater being contained on the premises have been included as condition 6. Condition 12 has been added to reduce the likelihood of contamination from stormwater by directing shed roof run-off away from stockpiles. Noting the proximity to nearby native vegetation and the seasonal surface water line, condition 13 has been added to ensure that stormwater is contained on the premises.
Operation of a scrap metal recycling facility Storage of lead acid batteries and other hazardous waste	Spills of dangerous or hazardous waste	**Pathway:** Overland flow and subsurface seepage **Impact:** human health, soil and groundwater quality	• Industrial premises adjacent to the premises • Native vegetation 44 m south-west and 230 m south-east of premises • Seasonal minor surface water line 645 m south of premises	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Conditions 1, 5, 7 **Condition 8, 17**	Applicant provided controls have been added requiring the diesel tank to be bunded and capable of containing leaks and spills. Residual liquid waste and used batteries are to be contained within an impervious sealed tank/container (condition 5). The premises is conditioned to require the use and maintenance of spill kits (condition 7). Condition 8 has been added to support the correct disposal of spill kits and related material. Condition 17 relating to fire management also includes notification procedures for major spill incidents.
Upset conditions (fire) resulting from: Oxy-cutting Scrap metal stockpiling Toxic gas, smoke, odour Firefighting wash-water	Toxic gas, smoke, odour	**Pathway:** Air/windborne pathway **Impact:** Health and amenity	• Industrial premises adjacent to the premises • Native vegetation 44 m south-west and 230 m south-east of premises • Kalgoorlie Gas Turbine Station 115 m west of premises (and fuel unloading bays 275 m north-west premises • Residential premises 840 m north-east and 1.27 km east of premises boundary	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	N	Condition 1, 5 **Condition 15, 16, 17**	The delegated officer notes complaints of smoke from burning on the premises received by the City of Kalgoorlie-Boulder. Applicant provided controls have been conditioned on the licence requiring fire-fighting equipment to be present on site (condition 1). Oxy-cutting controls have also been added and strengthened with oxy-cutting to be ceased if smoke is visible crossing the boundary of the premises (condition 5). Stockpile dimensions have been conditioned as per *DFES Guidance note 04: Fire Prevention and Management in a Recycling Facility*. The delegated officer notes the distance to other industrial premises including the nearby Kalgoorlie Gas Turbine Station. Standard fire and emergency management controls added (condition 16) to support applicant controls. The development and implementation of a fire and emergency management plan has also been conditioned (condition 17). Related monitoring controls have also been added (condition 16).
	Firefighting wash-water	**Pathway:** Overland flow and subsurface seepage **Impact:** human health, soil and groundwater quality	• Industrial premises adjacent to the premises • Native vegetation 44 m south-west and 230 m south-east of premises • Seasonal minor surface water line 645 m south of premises	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	N	Condition 1, 5 **Condition 13, 15, 16, 17**	Standard fire and emergency management controls added (condition 15) which are supported by the requirement of stormwater to be contained on the premises (condition 13). Related monitoring controls have been added (condition 17). The development and implementation of a fire and emergency management plan has also been conditioned (condition 16).

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.

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 13 January 2025	None received	N/A
Local Government Authority advised of proposal on 13 January 2025	The City of Kalgoorlie Boulder replied on the 19 January 2025 advising that it had received complaints of toxic smoke, due to burning of material on the premises. The City also notes concerns over dust being generated from large stockpiles of material (over 3 metres).	Stockpile height has been conditioned to a maximum of 5 metres (Condition 5, Table 3), and the requirement for a 4 metre clearance between the boundary of the premises and stockpiled scrap metal has also been conditioned. Condition 16 has been added instructing no waste to be burnt on the premises, and any unauthorised fire to be extinguished as soon as possible. A fire and emergency management plan has also been added to ensure the premises has fire management and emergency procedures.
Applicant was provided with draft documents on 11 April 2025	Applicant responded on the 09 May 2025. See appendix 1.	See appendix 1.
Local Government Authority advised of applicant's significant changes to proposal on 15 May 2025.	The City of Kalgoorlie Boulder provided comments on 18 June 2025 and the 27 June 2025: • The City has reiterated their concerns for smoke, dust and fumes from scrap metal recycling activities; • The proposed throughput changes are noted to also increase traffic volumes raising additional noise concerns. The City has requested an acoustic assessment to ensure the premises operations are in line with *Environmental Protection (Noise) Regulations 1997*; • The City notes concern that stockpile heights of 20 m are not structurally safe and pose a fire risk and also notes one adjacent premises is a tyre business;	Conditions 9-11 have been added to the licence requiring the licence holder to undertake a noise validation assessment. Conditions 7-8 have been added to the licence to address spills of hazardous material. Condition 5, Table 3 requires lead acid batteries to be stored in sealed containers, on a hardstand. Table 1 also requires the premises to maintain a spill kit in good working order and that the diesel is self bunded and positioned on a hardstand. The department has clarified with the City on the 03 July 2025 that planning approval can be retrospectively applied for. The department has informed the applicant that planning approval should be sought from the City of Kalgoorlie-Boulder.

Consultation method	Comments received	Department response
	• Adequate bunding is requested to contain hazardous material spillage and runoff into stormwater drains and soil. The City also notes lead-acid batters must be stored in a matter that ensures no risk of soil, air or water contamination; • The City notes adequate fencing/screening is required to mitigate visual impacts and reduce dust; and • The City notes the premises does not have planning approval for this activity.	

5. Conclusion

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

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Fire and Emergency Services (DFES), 2020, *Guidance Note 04: Fire Prevention and Management in a Recycling Facility*. Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. 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
Cover page, prescribed premises category and throughput	Request to increase the rate at which scrap metal can be received from 15,000 tonnes per year to 25,000 tonnes per year. The increase in annual tonnage will not impact the amount of material stored at the premises at any one time.	Throughput has been increased to 25,000 tonnes per annual period. The delegated officer notes the amount of material stored on the premises at any one time is limited by the stockpile dimension restrictions.
1 (Table 1, Row 3)	Request reference to shearer is removed. The shears are an attachment on the mobile plant (excavator) and not an individual piece of equipment as suggested by the current wording.	Infrastructure table (Table 1) has been updated to note excavator with shearer attachment.
5 (Table 3, Row 1)	Request to increase maximum storage height from 5 m to 20 m. A height limit of 5 m will severely restrict the amount of material that can be stored on the premises and will impact the commercial viability of the site.	The delegated officer notes a 20 m stockpile height is not appropriate given the risk of stockpile collapse, the size of the site, the fire risk, and the lack of sufficiently sized retaining/masonry walls to contain a stockpile of this height. The stockpile dimensions are consistent with *DFES Guidance Note 04: Fire Prevention and Management in a Recycling Facility*.
	Request to decrease minimum clearance between stockpiles from 5 m to 3 m.	Request denied. The delegated officer notes that this separation distance comes from the *DFES Guidance Note 04*; noting a minimum separation distance of 5 m. This allows fire engine access around stockpiles and reduces the risk of fire spread.
	Request that the 4 m clearance around the boundary of the premises and any stockpiled waste is replaced with a 2 m clearance.	Request denied. The delegated officer notes that the northern boundary of the premises is adjacent to crown land with vegetation and across from the crown land is a tyre storage facility. Across the eastern boundary is a neighbouring industrial premises. A 2 m separation distance would not be sufficient for fire-fighting purposes. As per *DFES Guidance Note 04* if a masonry wall is present, this separation distance can be reduced. Table 3, Row 1 has been updated to reflect this. The delegated officer notes that scrap metal is flammable due to hydrocarbon contamination and may contain residual waste, such as floc which is highly flammable.
7	Request to amend operating hours to 05:00-20:00, seven days a week.	The delegated officer has removed the condition relating to operating hours for the premises. The premises is required to

Condition	Summary of applicant's comment	Department's response
		operate in line with the *Environmental Protection (Noise) Regulations 1997.* Noise validation conditions have been added to the licence.
10 and 12	Correct reference 'works approval holder' to 'licence holder'.	Terms corrected.
Definitions Table 5	Delete definitions for 'biennially' and 'Schedule 2' as not used in the draft licence.	Removed from licence definitions.
	Amend definition for 'Non-combustible barrier' to remove requirement for the barrier to "meet fire ratings for AS 1530.4 and the Building Code of Australia".	The definition and reference for 'non-combustible barrier' has been removed. The delegated officer references *DFES Guidance Note 04* and the guidance regarding masonry walls. This definition has been replaced with masonry walls and the condition updated to specify the required size of a masonry wall.