



Application for Licence

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

Licence Number	L2942/2025/1
Applicant	Neptune Site Services Pty Ltd
ACN	626 731 771
File number	APP-0027961
Premises	Neptune Site Services 1 Yagan Street PINJARRA WA 6208 Legal description - Lot 1 on Plan 416141
Date of report	18 June 2025
Decision	Licence granted

Abbie Crawford
MANAGER, WASTE INDUSTREIS
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary and overview of premises	1
3. Risk assessment.....	1
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors.....	4
3.2 Risk ratings.....	6
Consultation	9
4. Conclusion	9
References.....	9
Table 1: Proposed applicant controls	2
Table 2: Sensitive human and environmental receptors and distance from prescribed activity.	4
Table 3: Risk assessment of potential emissions and discharges from the premises during operation.....	7
Table 4: Consultation	9
.Figure 1: Distance to sensitive receptors.....	5

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 L2942/2025/1 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 8 March 2025, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application sought a licence relating to operation of a category 62 solid waste depot at the premises, which was constructed in accordance with Works Approval W6710/2022/1. The premises is approximately 1.7 km west of Pinjarra town centre within the industrial area.

The Delegated Officer notes that time limited operations phase of the Works Approval officially ended on 7 February 2025 with the licence application not received by the department until 8 March 2025.

Activities at the premises include the acceptance, processing and storage of construction waste, including sand; bricks and concrete rubble; timber; metals such as steel, tin, and aluminium; packaging materials like plastics, cardboard, and paper; as well as ceiling and tile waste.

The premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) as defined in licence L2942/2025/1. 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 L2942/2025/1.

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	Operation solid waste depot (acceptance, sorting and storage of construction waste such as bricks, sand, steel, cardboard/paper, plastic, rubble, ceiling and tile waste)	Air / windborne pathway	<p>Unloading, sorting, screening and storage of waste will occur within an enclosed shed</p> <p>Vehicle entry and exit areas are fitted with a reticulated dust suppression system.</p> <p>Roof sprinklers spray water to keep waste damp during sorting, reducing dust.</p> <p>Steel rollers doors are at each point the shed's entry and exist locations.</p>
Noise		Air / windborne pathway	Operations limited between hours of 0700 and 1700 hours Monday to Friday
Windblown waste		Air / windborne pathway	<p>Limited waste types accepted</p> <p>All unloading, sorting, screening and storage of waste will occur within the shed</p>
Fire and smoke		Air / windborne pathway	<p>All skip bins and entry points are signed with a list of prohibited items. This list is also clearly explained to the customer prior to filling their bin.</p> <p>All waste tipping and sorting operations are conducted exclusively within the shed, which is constructed with steel cladding with a fire hose reel, and a fire hydrant.</p> <p>All walls within 3 m of the boundary are fitted with additional fire-resistant cladding,</p> <p>Roof sprinklers operate continuously to keep waste damp during sorting,</p>

Emission	Sources	Potential pathways	Proposed controls
			<p>reducing the risk of fire.</p> <p>Waste is spread out via an excavator and grab for further visual inspection for possible illegally dumped items such as gas bottles, flares, flammable items for immediate removal.</p> <p>A Fire and Emergency Management Plan has been prepared and maintained for the premises.</p>
Asbestos and ACM		Air / windborne pathway	<p>Limited waste types accepted; demolition waste and asbestos are not accepted</p> <p>An Asbestos Management Plan has been developed for the premises.</p>
Contaminated/ sediment laden stormwater		<p>Overland runoff</p> <p>Seepage to soil and groundwater</p>	<p>Limited waste types accepted</p> <p>No washing of vehicles at the premises</p> <p>All unloading, sorting, screening and storage of waste will occur within the shed</p> <p>The shed floor is constructed of 150 mm reinforced concrete hardstand.</p> <p>All external areas designated for storing waste containment equipment are also constructed with hardstand.</p> <p>All stormwater on hardstands will be directed to onsite infiltration swales (along western margin of premises) via a series of sumps</p>

3.1.2 Receptors

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

Table 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
Residential Premises	390 m and 440 m east of the premises boundary
Commercial/ Industrial premises	Immediately adjacent on all sides
Environmental receptors	Distance from prescribed activity
Priority ecological communities	P3 - Banksia Woodlands of the Swan Coastal Plain ecological community- approximately 300 m north-east and 390 m southeast of the premises boundary
Geomorphic wetlands- swan coastal plain -Multiple Use – Palusplain wetland area	The premises is located within the mapped multiple use wetland area
DBCA Legislated lands and water	960 m southeast of the premises boundary
Peel Inlet Management Area	1.3 km northeast of the premises boundary
Surface water body	870 m north of the premises boundary
Minor surface water line	300 m east of the premises boundary
Proclaimed Murray groundwater area (<i>Rights in Water and Irrigation Act 1914</i>)	Premises located within the groundwater area
Environmental Protection (Peel Inlet - Harvey Estuary) Policy boundary	The premises is located within the Environmental Protection (Peel Inlet - Harvey Estuary) Policy boundary
Underlying groundwater (non-potable purposes)	Depth to groundwater is estimated to be approximately 5 - 10 meters below ground level (mbgl).

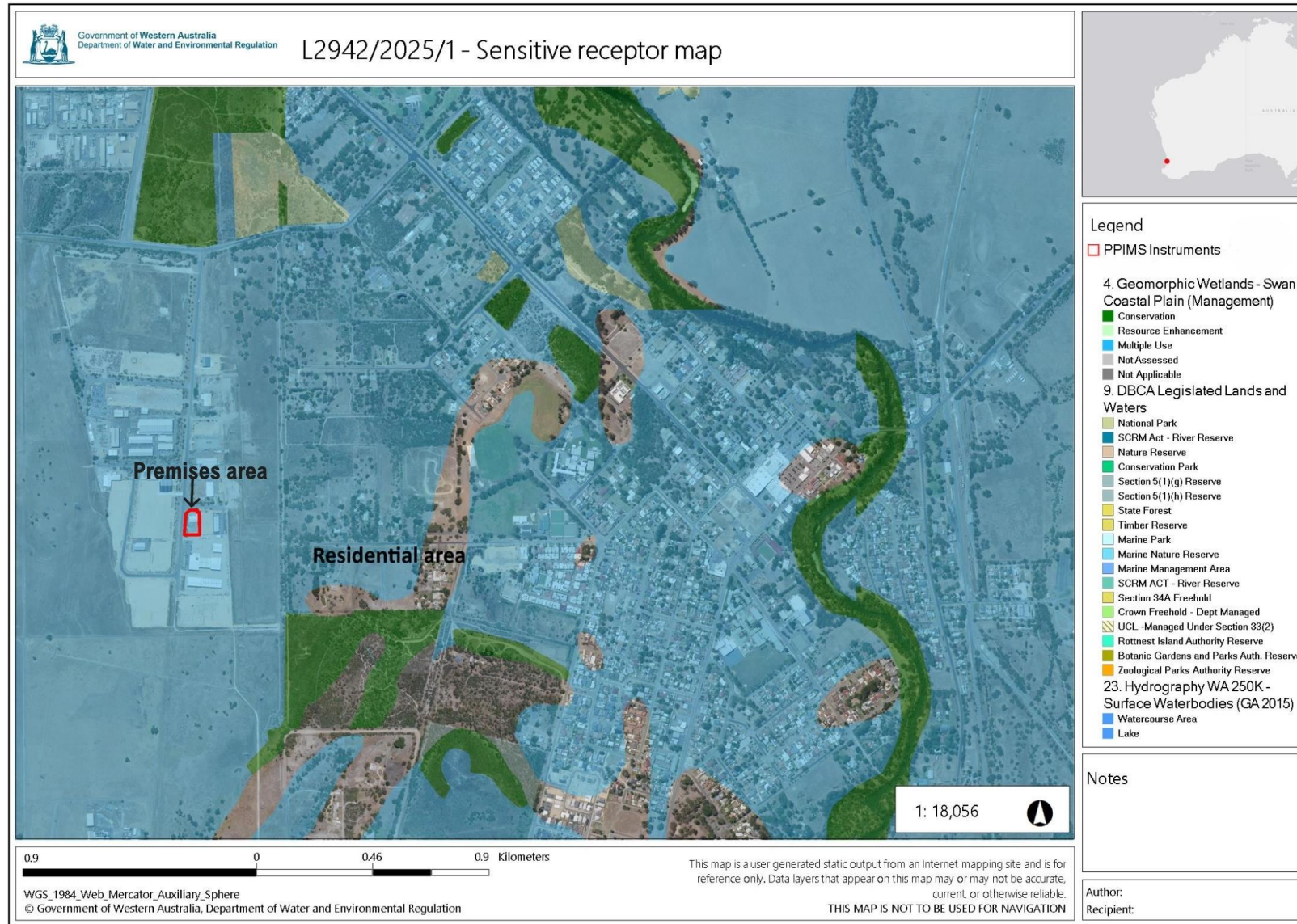


Figure 1: Distance to sensitive receptors

Licence: L2942/2025/1

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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 L2942/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises.

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?	Condition s ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Operation solid waste depot (acceptance, sorting and storage of construction waste such as bricks, sand, steel, cardboard/paper, plastic, rubble, ceiling and tile waste)	Dust	Air / windborne pathway causing impacts to health and amenity	Residence ~ 390 m and 440 m east of the premises boundary Industrial premises immediately adjacent to the premises Priority 3 ecological communities ~ 300 m north-east of the premises boundary DBCA land ~ 960 m south-east of the premises boundary	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 8, 9 and 13	The Delegated Officer considers the present infrastructure and controls proposed by the applicant are sufficient to prevent dust emissions occurring under most circumstances.
	Noise			Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Condition 1,2, 8 and 13	The Delegated Officer considers the controls proposed by the applicant are sufficient to prevent impacts from noise emissions occurring under most circumstances. Noise emissions are adequately regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> .
	Windblown waste			Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 8, 11 and 13	The Delegated Officer considers the controls proposed by the applicant are sufficient to prevent the risk of windblown waste.
	Fire and smoke			Refer to Section 3.1	C = Major L = Rare Medium Risk	Y	Condition 1, 2, 5, 6, 8, 11, 12 and 13	The Delegated Officer considers the controls proposed by the applicant are sufficient to prevent unauthorised fires occurring under most circumstances.
	Asbestos			Refer to Section 3.1	C = Major L = Rare Medium Risk	Y	Condition 2, 3, 4, 5, 6, 7, 11, 12 and 13	The Delegated Officer considers the controls proposed by the applicant are sufficient to prevent risks occurring from asbestos.

Licence: L2942/2025/1

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				
	Contaminated/sediment laden stormwater	<p>Pathway: Overland runoff</p> <p>Seepage to groundwater</p> <p>Impact: Ecosystem disturbance or impact to surface water quality</p>	<p>Proclaimed Murray groundwater area</p> <p>The premises within Peel Inlet - Harvey Estuary</p> <p>The premises located within the mapped multiple use wetland</p> <p>Surface water bodies ~870 m north of the premises boundary</p> <p>Minor surface water line ~300 m north of the premises boundary</p>	Refer to Section 3.1	<p>C = Moderate</p> <p>L = Rare</p> <p>Medium Risk</p>	Y	Condition 1, 2, 10 and 13	The delegates officer considers that the applicant's proposed infrastructure and management controls are likely to be sufficient to mitigate the risk occurring from contaminated stormwater.

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.

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 5 May 2025	None received	N/A
Local Government Authority advised of proposal on 9 May 2025	On 9 May 2025, the Shire of Murray advised that it holds no objections to the proposed licence, subject to the reinstatement of the operational controls previously applied under Works Approval W6710/2022/1.	Noted.
Applicant was provided with draft documents on 17 June 2025	The applicant responded via email on 18 June 2025, requesting that the comment period be waived and that the licence be issued.	Noted.

4. 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 Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.