



Application for Licence Amendment

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

Licence Number	L6818/1997/11
Licence Holder	Shire of Bridgetown Greenbushes
File Number	DER2015/000123-1
Premises	Bridgetown Waste Management Facility Lot 903 Bridgetown – Boyaup Brook Road BRIDGETOWN WA 6255
Date of Report	Legal description - Lot 903 on Plan 189961
Proposed Decision	Revised licence granted

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

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1. Decision summary

Licence L6818/1997/11 is held by the Shire of Bridgetown Greenbushes (the Licence Holder) for the Bridgetown Waste Management Facility (the Premises), located at Lot 903 on Plan 189961, Bridgetown, WA.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of Container Deposit Scheme (CDS) at the Premises.

As a result of this assessment, Revised Licence L6818/1997/11 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department 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

On 9 September 2020 the Licence Holder applied to the department to amend Licence L6818/1997/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The amendments being sought relate to the increase in throughput of Category 62 by 500 tonnes per annum to allow for the Container Deposit Scheme (CDS) to operate at the Premises.

In accordance with section 53 of the EP Act, alterations to a prescribed premises must be done so in accordance with a works approval, licence, closure notice or environmental protection notice (or amendments thereof). In accordance with DWER's *Industry Regulation Guide to Licensing* (June 2019), the Delegated Officer has determined that alterations to the premises to include CDS operations are appropriately facilitated via a licence amendment (which is the subject of this amendment report).

Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
61	700 tonnes per annual period	700 tonnes per annual period	No change
61A	5 000 tonnes per annual period	5 000 tonnes per annual period	No change
62	5 000 tonnes per annual period	5 500 tonnes per annual period	Increase of 500 tonnes per annual period
64	5 000 tonnes per annual period	5 000 tonnes per annual period	No change

As part of this amendment package the department has not undertaken any additional risk assessment of the Premises related to previously approved activities. The current licence requires a number of improvement conditions to be met, and compliance with these

requirements has not been assessed as part of this amendment package.

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 *Guidance Statement: Risk Assessments* (DER 2017).

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(s) during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary as well as the current operational controls at the premises.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways/impact	Proposed controls
Dust	Vehicle movements	Air/windborne pathway causing impacts to health and amenity	sealed roads within CDS area. CDS material collection facility in western side of secondhand goods shed.
Noise	Unloading, loading and storage of waste	Air/windborne pathway causing impacts to health and amenity	Comply with <i>Environmental Protection (Noise) Regulations 1997</i> – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations. CDS material collection facility in western side of secondhand goods shed.
Residual liquids, contaminated stormwater.	Unloading, loading and storage of waste	Overland runoff and infiltration potentially causing soil and groundwater contamination	Accept Approved CDS materials only. CDS material collection facility in western side of secondhand goods shed. Concrete Hardstand with gradient towards stormwater sump. Stormwater will be collected and directed away from waste storage areas. Transfer station is bituminised and has site drainage.
Smoke	Upset conditions (Fire)	Air/windborne pathway causing impacts to health and amenity	Fire extinguishers located within the CDS shed, and hydrants on the premises. Premises is secured when unattended.
Fire wash waters	Firefighting activities	Overland runoff and infiltration potentially causing soil and water contamination	No specific controls for containment of fire wash waters.

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), the Delegated Officer has excluded employees, visitors and contractors of the Licence Holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 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 (*Guidance Statement: Environmental Siting* (DER 2016)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from activity / prescribed premises
Residential Premises	Approximately 400 m north Approximately 600 m south east
Environmental receptors	Distance from activity / prescribed premises
Hester Conservation Park Class A	100 m north
Kaniyang 18 Camp Aboriginal Site of Significance 17495	350 m south west
Blackwood River Aboriginal Site of Significance 20494	1.1 km north west
Minor perennial watercourses	Within 1km -several

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for those emission sources which are proposed to change 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 Licence Holder 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 Licence Holder'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 Licence Holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L6818/1997/11 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. increased throughput and container deposit scheme activities.

The conditions in the Revised Licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4. Risk assessment of potential emissions and discharges from the Premises during operation.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/ Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Vehicle movements on gravel road unloading, loading, sorting and storage of CDS waste.	Noise	Air/windborne pathway causing impacts to health and amenity	Residential Premises approximately 400 m north and 600 m south east	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A
	Dust			Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A
unloading, loading, sorting and storage of CDS waste.	Odour	Air/windborne pathway causing impacts to health and amenity	Residential Premises approximately 400 m north and 600 m south east	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	N/A	N/A
	Liquid waste residues and contaminated stormwater	Overland runoff and infiltration potentially causing soil and groundwater contamination	Hester Conservation Park Class A 100 m north Minor perennial watercourses within 1 km	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	<u>Conditions 1.2.18, 1.2.19</u>	While the Licence Holder has specified measures to be taken to manage residual spills, conditions 1.2.18 and 1.2.19 are added as a contingency measure to specify actions to be taken.
Upset conditions (Fire)	Smoke	Air/windborne pathway causing impacts to health and amenity	Residential Premises approximately 400 m north and 600 m south east	Refer to Section 3.1	C= Minor L = Unlikely Medium Risk	Y	Condition 1.2.20 (a) and (b)	N/A
	Firefighting washwater	Overland runoff and infiltration potentially causing soil and groundwater contamination	Hester Conservation Park Class A 100 m north Minor perennial watercourses within 1 km	Refer to Section 3.1	C= Minor L = Unlikely Medium Risk	N	<u>Condition 1.2.20 (c) (d) and (e)</u>	The Licence Holder has not specified how firefighting washwater would be managed to prevent discharge to the environment. Condition 1.2.20 specifies actions to be taken.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

Note 2: Proposed Licence Holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Licence Holder provided draft documents on 11 September 2020	(1) Correct the premises address on page 1 of the Licence to read; "Bridgetown Waste Management Facility Lot 903 Bridgetown – Boyup Brook Road BRIDGETOWN WA 6255",	The Licence and amendment report have been updated to reflect the correct name and address.
	(2) Correct any reference to the Bridgetown Landfill being Class II, as we are a Class III landfill.	The current licence is for a Class II facility only, and since at least 2016 has specifically limited waste acceptance to Class II waste only. Changes to the landfill class has not been assessed as part of this amendment. While the front page of the licence has the category 64 definition which states Class II or III landfills, the waste acceptance criteria for this landfill restricts it to Class II waste only. If the Shire wishes to amend the Licence, an application for an amendment should be submitted to the Department.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments and updates

Table 6 provides a summary of the proposed amendments as well as formatting changes.

Table 6: Updated licence conditions in this amendment

Existing condition	Summary	Revised licence condition	Conversion notes
Schedule 1	Addition of CDS area map	N/A	N/A
Definitions	Added CDS relevant definitions	N/A	N/A

Appendix 1: Summary of Licence Holder's comments

Condition	Summary of Licence Holder's comment	Department's response
N/A	Naming and address of Landfill to be corrected	Corrected typographic error
	Change to Class 3 Facility, not just Class 2	Current Licence is restricted to Class 2. An application for an amendment is required to change waste acceptance.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY				
Application type				
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L6818/1997/11	
		Relevant works approval number:		N/A
Date application received		9 September 2020		
Applicant and Premises details				
Applicant name/s (full legal name)		Shire of Bridgetown Greenbushes		
Premises name		Bridgetown Waste Management Facility		
Premises location		Lot 903 on Plan 189961		
Local Government Authority		Shire of Bridgetown Greenbushes		
Application documents				
HPCM file reference number:		DEC2794-1		
Key application documents (additional to application form):		1. Application form 2. CDS layout map 3. 3B – MOU hastie waste 4. 7 – siting and location 5. 8A – site map		
Scope of application/assessment				
Summary of proposed activities or changes to existing operations.		Operation of CDS activities Already licenced for 62 so increase throughput for cat 62 Eastern half of second hand goods shed (existing infrastructure) aggregation point Refund point under canopy adjacent to shed (see attachment 2)		
Category number/s (activities that cause the premises to become prescribed premises)				
Table 1: Prescribed premises categories				
Prescribed premises category and description		Proposed production or design capacity		
Category 62: Solid Waste Depot (Already prescribed for this category so only additional throughput)		500 tpa		
Legislative context and other approvals				
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>		
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:		
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:		

Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date:
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: No additional clearing required
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed within a CAWS catchment
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: Type: Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office:
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u>)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Not compatible
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004</i> , <i>Environmental Protection (Controlled Waste) Regulations 2004</i> , <i>State Agreement Act xxxx</i>)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Controlled Waste Regs Noise Regs

Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification