Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

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
Internal number	INS-0001354
Application number	APP-0032828
Premises	Bridgetown Waste Management Facility Recycle Road BRIDGETOWN WA 6255 Legal description – Part Lot 903 on Plan 189961 As defined by the by the premises boundary coordinates set out in the revised licence
Date of Report	20/05/2026
Decision	Revised licence granted

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1. Decision summary

Licence L6818/1997/11 is held by the Shire of Bridgetown-Greenbushes (licence holder) for the Bridgetown waste management facility (the premises), located on Part Lot 903 on Plan 189961, Recycle Road, Bridgetown.

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 ongoing operation of the premises. As a result of this assessment, revised licence L6818/1997/11 has been granted.

The revised licence issued because of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises. The revised licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

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 19 December 2025, 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 following amendments are being sought:

- Rework accepted waste types and specifications to facilitate acceptance of domestic furniture, timber, and wood waste for disposal via landfilling and aggregation of treated timber waste for offsite disposal,
- Correct waste acceptance processing tables to align specified waste streams with respective premises categories,
- Expand the acceptance specification for e-waste to include all scheduled items from the Waste Avoidance and Resource Recovery (e-waste) Regulations 2024,
- Incorporate provisions for the segregation and stockpiling of scrap metal, mattresses, and agricultural chemical drums collected as part of the DrumMUSTER program for offsite disposal,
- Extend the submission date for the premises post closure plan by 12-months to accommodate procurement delays, and
- Address the findings of the recently completed geotechnical investigation, including expansion of monitoring well network under condition 27 of the existing licence.

This amendment is limited only to changes to Category 62 and 64 activities from the existing licence. No changes to the aspects of the existing licence relating to Category 61 or 61A activities have been requested by the licence holder. However, the licence holder has requested amendments to the existing conditions to clarify waste streams

There are no proposed changes to the existing approved capacities for each premises category, only clarification and capture of existing activities.

On 9 February 2026, the Delegated Officer issued a request for further information to the licence

holder to facilitate the requested amendments. A response was then received on 31 March 2026 which also included additional amendments. Specifically, changes to the approved storage requirements for white goods (including large household appliances and temperature-exchange equipment) and vehicle batteries.

2.3 Geotechnical investigation findings

On 19 December 2025, the licence holder submitted a report detailing the results of geotechnical investigations undertaken at the premises to satisfy condition 22 of the existing licence. The submitted report provides details on the site geology, methods used, field investigation, data processing, results and interpretation. Recommendations and priority rankings were provided for the construction of new monitoring wells to complement the existing monitoring well network.

The licence holder engaged Southern Geoscience (SGC) to carry out a geophysical survey at the premises. The purpose of the investigation was to identify subsurface low resistivity (conductive) anomalies that may indicate the presence of groundwater or increased weathering depths and fracturing associated with potential faults and to use this information and supplementary information to recommend priority locations for additional monitoring wells. The airborne magnetics (AMAG) and electrical resistivity imaging (ERI) geophysical methods were employed. Publicly available AMAG data from a 2012 survey was processed and visualised to facilitate interpretation of possible structures and confirm the planned locations of the ERI survey lines. Following this, the ERI field investigation was carried out along three lines, denoted ERI-L1 to ERI-L3, between 27 and 29 October 2025.

SGC provided a recommendation that the drilling and installation of four new monitoring wells, three deep and one shallow, be undertaken to target interpreted low resistivity zones and improve the monitoring well coverage to the south and northeast of the site. SCG acknowledges the licence holders' budgetary limitations and proposed further options for staggered or reduced well construction, with priority rankings of priority 1 (high), 2 (medium) and 3 (low) assigned to the proposed wells based on their assessed merit.

The report was referred internally to the department Contaminated Sites Branch (CSB) for comment on the veracity of the consultants' comments provided, the appropriateness of the proposed additional monitoring wells, and guidance on which wells must be installed.

CSB has advised the Delegated officer that the geophysical investigations described were undertaken in a technically-sound manner using standard geophysical techniques. CSB confirmed that the interpreted geophysical results are considered sound and are consistent with the conceptual hydrogeological model for the area. Consequently, it is considered that the potential well locations that were identified by Southern Geoscience are acceptable, and are consistent with the results that were obtained from the ground-based geophysical investigations.

CSB considers that the most immediate priorities for the installation of monitoring wells are the installation of wells at sites MB14 and MB13 at the locations shown in Figure 15 of the Southern Geoscience report. This is because the electrical conductivity anomalies in the sub-surface at these sites may indicate the presence of significant groundwater pathways from the landfill site to environmental receptors. It would therefore be important that groundwater quality at these sites is monitored to ensure that leachate from the landfill site does not have the potential to cause offsite environmental harm. It is recommended that boreholes at both sites are drilled to refusal on bedrock, and that wells are then constructed with a six-metre-long slotted section at the base of each borehole. CSB also recommended that the licence conditions for the facility are reviewed after the new monitoring wells have been installed and after all the wells at the facility have been sampled.

The specified actions conditions of the existing licence have been amended as part of this licence amendment to remove redundant requirements and specify the installation requirements for the required two additional groundwater monitoring wells.

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 amendment report are detailed in Table 1. Table 1 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Leachate	Stockpiling of nominated solid waste stream pending collection for offsite disposal.	Seepage to soil and groundwater	Storage of e-waste in weatherproof leakproof sea containers. Storage of used lead acid batteries internally bunded, fire-resistant, weather-proof storage bin with a solid lid. Restriction of types of treated timber waste accepted at the premises. Storage of treated timber waste in a dedicated metal skip or hook-lift bin which is securely covered when not in use. Limited holding periods for stockpiled waste. Monitoring well network is sampled quarterly for heavy metals, organics and inorganics, and microbiology.
Smoke	Accidental fire/arson (mattress and wood waste stockpiles)	Airborne/wind	Fire extinguisher is available at the gatehouse for initial response. Mattresses stored within enclosed containers. Segregation and stockpiling of flammable wastes on gravel or earthen surface. Use of dedicated waste storage bins and containers. Limited holding periods for stockpiled waste. Use of container for storage of mattresses.

Emission	Sources	Potential pathways	Proposed controls
Fire debris and washwaters	Firefighting activities in the event of waste fire	Seepage to soil and groundwater	Expanded monitoring well network. Placement of waste stockpiles on compacted ground atop closed landfill cells.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the licence holder 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 below provides a summary of potential human and environmental receptors that may be impacted because of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental siting* (DWER 2020)). The proximity of the premises in relation to surrounding rural residences is shown in Figure 1.

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

Human receptors	Distance from prescribed activity
Rural residences	Approximately 136 m east of eastern premises boundary Approximately 190 m southeast of southeast corner of premises
Private bore - Kangaroo Gully - 1676	Approximately 520 m northeast of eastern premises boundary
Bridgetown Sports Ground, Les Woodhead Avenue, BRIDGETOWN	Approximately 180 m north or western premises boundary
Environmental receptors	**Distance from premises boundary**
Native vegetation - *Eucalyptus* sp, *Hovea* sp, Various other small vegetation	Within premises boundary
Farm dams	Approximately 200 m east of eastern premises boundary
Threatened and Priority flora	Priority One flora species (*Caladenia validinervia*) recorded within premises boundary (in proximity to Recycle Road access) **Listing Status (WA):** It is ranked as **Priority One** (Poorly-known taxa) by the Western Australian Department of Biodiversity, Conservation and Attractions (DBCA). This means it is known from only a few, often poorly documented populations, and is in need of further survey and urgent conservation attention.
Threatened fauna	Carnaby's black cockatoos (*Zanda latirostris*) recorded to the southwest of the premises

Underlying groundwater (non-potable purposes)	Karri combined – fractured rock underlying premises
Non-Perennial watercourse	Approximately 555 m west of northwestern premises boundary
TECs/PECs	No TECs/PECs recorded within or within vicinity of premises.
DBCA Hester Conservation Park (R 47892)	Immediately north of northern premises boundary
Cultural receptors	**Distance from activity / prescribed premises**
Aboriginal heritage site – Blackwood River - Creation / Dreaming Narrative	Approximately 977 m southwest of southern premises boundary, and 950 m northwest of northern premises boundary

Figure 1: Premises location (boundary in green)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change. The risk assessment process takes into consideration all potential source-pathway and receptor linkages as identified in Section 3.1. Where links are incomplete, 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 holders' controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The revised licence L6818/1997/11 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. solid waste acceptance, storage, and/or landfilling.

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

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

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence holder's controls**				
Stockpiling of nominated solid waste stream pending collection for offsite disposal.	Contaminated stormwater/waste leachate	Overland runoff and infiltration through soil profile potentially causing ecosystem disturbance or impacting surface water quality	Beneficial groundwater users, including stock watering (dams)	Refer to Section 5.1	C = Slight L = Possible **Low Risk**	Y	Conditions 2 and 5	N/A
Accidental fire/arson (mattress and wood waste stockpiles)	Smoke	Air/windborne pathway causing impacts to health and amenity	Rural residences and Bridgetown Sports Ground users	Refer to Section 5.1	C = Slight L = Possible **Low Risk**	Y	Conditions 2, 5, and14	N/A
Firefighting activities in the event of waste fire	Fire debris and washwaters	Overland runoff and infiltration through soil profile potentially causing ecosystem disturbance or impacting surface water quality	Beneficial groundwater users, including stock watering (dams)	Refer to Section 5.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5 and 14	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed licence holder's controls are depicted by standard text. **Bold and underlined 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
Licence holder was provided with draft amendment on (18/05/2026)	Refer to Appendix 1	Refer to Appendix 1

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.

As part of the licence amendment, the Delegated Officer has determined to revise the waste acceptance and waste processing tables within the licence to differentiate the various waste streams received according to the relevant premises category. This is intended to reduce any ambiguity between the different solid waste streams approved for receipt and handling as opposed to approved for onside disposal vial landfilling. The terms derived from the landfill dentitions have been correctly attributed to those wastes intended for burial. Wastes not intended for burial at the premises have been plainly described and included against the relevant premises category.

The Delegated Officer has also clarified that the premises may store up to a total of 99 tyres on the premises. Storage of 100 or more tyres would require an amendment to the licence to include prescribed premises category 57, *Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.* The production or design capacity for this premises category is 100 tyres or more.

5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

Table 5: Summary of licence amendments

Condition no.	Proposed amendments
Premises details	Address corrected.
Licence history	Updated to capture amendment application.
1, Table 1	Premises category column inserted
2, Table 2	Premises category column inserted
	Putrescible waste amended to green waste under approved Category 61A waste type.

	Acceptance specification for Category 62 inert Wate Type 1 corrected to reflect statutory limitation that no more than 100 used tyres to be stored on the premises at any one time.
	Acceptance specification for Category 62 e-waste corrected to reflect that premises may receive all regulated e-wastes for storage.
	Limit of 99 used tyres inserted to prevent triggering licencing requirement under category 57 (used tyre storage)
	Scrap metal, DrumMUSTER containers, mattresses, cardboard, and treated timber waste included as acceptable waste streams for storage under Category 62. Notation inserted advising that no treated timber power poles may be accepted.
	Acceptance specifications for Category 64 waste streams amended for clarity. Terms used are taken from the Landfill Definitions. Notation inserted to clarify that putrescible waste accepted at the premises for burial includes mixed municipal solid waste (MSW), kerbside waste, wood and untreated timber waste, bulky wooden and timber composite items, and timber furniture.
4, Table 3	Premises category column inserted
	Process limit wording amended for clarity.
5, Table 4	Premises category column inserted.
	Process limit for Category 62 inert Wate Type 1 corrected to reflect that no more than 100 used tyres to be stored on the premises at any one time and no landfilling of tyres is permitted.
	Maximum onsite storage times and approved locations inserted into process limits for relevant solid waste streams accepted under category 62.
	Specifications for the storage of household and used lead acid batteries inserted under category 62.
	Specifications for the storage of different e-waste types under category 62 have been inserted for clarity.
	Scrap metal, DrumMUSTER containers, mattresses, cardboard and treated timber waste included as distinct waste streams under category 62 waste storage. Process limits inserted for each waste stream.
	Process limits for waste streams accepted under category 64 clarified.
6, Table 5	Leachate storage pond, Liquid waste storage tank, and Liquid waste drying pad requirements wording corrected. Should read coefficient of permeability (hydraulic conductivity) rather than simply *permeability.*
21, Table 10	Table title corrected
	Monitoring well location references updated to include ne wells to be constructed at locations MB13 and MB14.
Former condition 22	Deleted – specified actions undertaken. Outstanding requirements included under amended specified actions condition (new condition 35)

24	Reference to monitoring bores changed to monitoring wells for consistency across conditions.
25	Extension of submission date for the *final landfill profile and post closure plan* by 12-months to 31 August 2027.
29, Table 13	Condition 19 liquid waste monitoring requirements amended for clarity.
30, Table 12	Reference to form N1 removed – any breach can be reported via email to the CEO.
n/a	Reference to Works conditions amended to Specified Actions - conditions moved to end of licence to better facilitate future deletion when requirements have been met.
35, Table 15 (former condition 23)	*Infrastructure, Design, construction, and installation requirements* and *Monitoring well locations* amended to align with findings of geotechnical survey and contaminated sites advice. Wells at location MB13 and MB14 specified. Timeframe expanded to accommodate delays.
Former condition 22, Table 11	Specified action condition pertaining to ground-based geotechnical survey requirements deleted as requirements have been met.
Table 16: Definitions	Definition of e-waste Regulations inserted.
	Definition of e-wase amended to accurately reflect Waste Avoidance and Resource Recovery (e-waste) Regulations 2024
	Definition of greenwaste amended for clarity.
	Definition of hardstand corrected.
Figure 3	New figure depicting waste stockpile locations inserted.
Figure 4	Figure renamed.
Figure 5	New figure inserted depicting waste storage locations in transfer station area.
Figure 6	Renamed “Liquid waste infrastructure”
Figure 7	New figure inserted depicting monitoring well locations.
Schedule 3	Description updated for clarity.
Schedule 4	Form N1 deleted.

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.

Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
5, Table 4: Solid waste processing Row 5 – e-waste	We are currently investigating improved methods for storage of lead acid batteries. The recycler whom we send the batteries to has a steel case option available for hire. We have requested, and are waiting for costings and further details to determine feasibility. Cat 5 E-waste – a 90-day collection timeframe is feasible for smaller e-waste items, including small appliances and entertainment units/televisions. For larger appliances (such as temperature regulation units, dishwashers and ovens), an annual collection timeframe is requested to align with the proposed scrap metal collection. It is proposed that these larger items be separated from the e-waste category in condition (g), if practicable. The stockpile shown in Figure 3 is currently used to store appliances containing refrigerant. Once sufficient quantities are accumulated, these are degassed and then transferred to the scrap metal stockpile. Can you please confirm whether this approach remains acceptable?	Noted. Approved storage time amended to differential small and large items of e-waste which may be handles as scrap metal.
5, Table 4: Solid waste processing Row 6 – Special wase type 1	Added asbestos storage location on map.	Noted. Supplied revised map inserted as Figure 5
5, Table 4: Solid waste processing Row 8 – Scrap metal	Can the collection frequency be extended to annually? While we will aim to meet the 180-day requirement, access to the stockpile area is often limited during winter due to ground conditions and heavy machinery constraints. An annual collection timeframe would be more practical for site operations. In addition, can you please confirm whether small combustion equipment and vehicles are permitted within this stockpile, provided that all oils and fuels are removed prior to storage?	Noted. Approved storage period extended. Waste acceptance table updated to include combustion equipment and small machinery (lawnmowers, vehicles etc.) and requirement that such items be drained of fuel and fluids.

Condition	Summary of licence holder's comment	Department's response
5, Table 4: Solid waste processing Row 9 – DrumMuster Drums	As a new, larger contained storage area has been established onsite, and the recycler is only able to service the site when sufficient volumes are available, we request that the collection frequency be extended to annually.	Noted. Approved storage period extended.
5, Table 4: Solid waste processing Row 10 – Mattresses	90-day collection frequency is acceptable. The site accepts mattresses of all sizes, including ensemble bases.	Noted. Reference to mattresses of all sizes, including ensemble bases added to waste acceptance table.
5, Table 4: Solid waste processing Row 18 – Putrescible waste	Can the requirement be amended from disposal to landfill on the day of acceptance, to disposal within 48 hours using hook lift bins? Due to contractor availability and regional logistics, same-day disposal of putrescible waste is not operationally feasible. A 48-hour timeframe would allow for practical management of waste while maintaining controlled containment prior to disposal.	Noted. Process limit amended to allow for 48-hour storage when Contaminated soils, Inert Waste Type 2, and Putrescible is stored in hook-lift binds pending offsite disposal.
Table 15: Infrastructure requirements – additional groundwater bores	Quotes have been requested from three drilling contractors, and funding has been sought through the 2026/27 budget for the installation of MB13 and MB14. As significant funding is also being sought for the Final Landform and Post Closure Plan projects, there is a risk that this work may not be approved within the next budget. The Shire therefore requests that the timeframe for installation be late 2027. The works will be undertaken sooner if funding is approved or becomes available	Noted. Groundwater monitoring wells must be constructed, developed (purged), and determined to be operational by no later than 31 December 2027
Figure 4: Waste Transfer station map	Will this map be removed from our licence, as is contains old infrastructure which is no longer present on site (e.g. the Containers for Change shed and second-hand goods shed)?	Noted . **Waste transfer station map** removed and references amended to updated **Waste storage locations** map

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Table 1: Licence Holder Controls Onsite firefighting equipment	Mattresses are stored within enclosed containers, limiting access and reducing the likelihood of ignition. A fire extinguisher is available at the gatehouse for initial response. In the event of a fire, staff will contact Fire and Emergency Services (000). The Incident Control Centre can also be contacted to support the response, including local SES resources and equipment on site. The ICC is located across the road from the Waste Facility on Les Woodhead Avenue. This approach is considered appropriate given the potential need for specialised equipment, including breathing apparatus and water tankers for suppression.	Noted. Containers and fire extinguisher added as Licence Holder controls for smoke emissions.