



## Application for Licence Amendment

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

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<b>Licence Number</b>	L7200/1997/10
<b>Licence Holder</b>	Cleanaway Pty Ltd
<b>ACN</b>	000 164 938
<b>File Number</b>	2010/008332-1~1
<b>Premises</b>	Gordon Road Transfer Station LOT 300 ON PLAN 401608 Corsican Place PARKLANDS WA 6180
<b>Date of Report</b>	14 July 2021
<b>Decision</b>	Revised licence granted

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**A/MANAGER WASTE INDUSTRIES**  
**REGULATORY SERVICES**

*An officer delegated by the CEO under section 20 of the EP Act*

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## 1. Decision summary

Licence L7200/1997/10 is held by Cleanaway Pty Ltd (licence holder) for the Gordon Road Transfer Station (the premises), located at Lot 300 on Plan 401608 Corsican Place, Parklands.

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 the premises. As a result of this assessment, revised licence L7200/1997/10 has been granted.

The revised licence issued as a result 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://www.der.wa.gov.au>.

### 2.2 Amendment summary

On 16 February 2020, an inspection of the premises was undertaken by Department of Water and Environmental Regulation (the department) Compliance staff.

The purpose of the inspection was to assess the following:

1. The operational and regulatory controls in place to manage and mitigate environmental impact; and
2. The risk of fire occurring at the site, and the controls in place to manage and mitigate environmental impacts from potential fires.

On 22 April 2020, the department wrote to the licence holder requesting that a Fire and Emergency Management Plan (FEMP) be prepared for the site, and that based on observations at the time of inspection, the department considers that the recycling activities within the Recyclables Handling Facility are consistent with the description of Category 62 solid waste depot, as defined in Schedule 1 of the *Environmental Protection Regulations 1987*. The activities and fire management within the Recyclables Handling Facility are not regulated by the existing licence.

It was therefore requested that the licence holder submit an application to amend licence L210/1997/10 to include the operation of the recycling activities within the building. The FEMP requested in the letter was to be submitted as part of this application to assist with assessment.

On 14 May 2020, the licence holder submitted an application to the department to amend licence L210/1997/10 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments were sought:

- Approval for the replacement of the existing compacted limestone green waste storage area with a concrete hardstand; and
- Capture of historic waste handling activities undertaken inside the recycling shed within the existing Licence.

The licence holder has advised that approximately 16,000 tonnes per annum of recyclable waste material including paper, cardboard, plastic, glass, aluminium, and steel, are brought to the site in collection vehicles from municipal recycling collections, as well as occasional commercial and industrial customers. These recyclables are deposited onto the tip floor within the Recyclables Handling Facility and fed onto a conveyor (using forklift or similar mobile plant) which directs material into a compactor unit. Compacted recyclable material is then transported offsite to a suitably licenced recycling facility. There is no proposed change to the approved waste throughput.

As part of the amendment application, the licence holder requested approval for the replacement of the existing compacted limestone surface at the green waste hardstand with concrete. The existing compacted limestone is routinely damaged by heavy plant machinery involved in the processing and handling of green waste. The installation of a durable concrete hardstand will reduce the need to for ongoing repairs to the hardstand. This request was subsequently withdrawn and will be addressed as part of a future works approval application.

During the validation of the application, it also was identified that the approved green waste processing activities undertaken at the premises are consistent with the description of Category 61A solid waste facility, as defined in Schedule 1 of the *Environmental Protection Regulations 1987*. The emissions associated with the processing of green waste on the premises are not regulated by the existing licence.

This amendment is limited only to changes to Category 62 activities from the Existing Licence, and the insertion of prescribed premises category 61A. No changes to the aspects of the existing licence relating to Category 57 have been requested by the licence holder.

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

**Table 1: Proposed design or throughput capacity changes**

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
<i>57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored</i>	Less than 300 tyres at any one time	Less than 300 tyres at any one time	No change
<i>61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.</i>	N/A	10, 000 tonnes per annual period	Insertion of category to capture green waste processing activities undertaken at the premises
<i>62: Solid waste depot: premises on which waste is sorted, or stored, pending final disposal or re-use.</i>	75,000 tonnes per annual period	75,000 tonnes per annual period	Capture of storage and handling activities within Recyclables Handling Facility

## 2.3 Consolidation of Licence

As part of this amendment package the department has consolidated the licence by incorporating changes made under the following amendment notices:

- *Amendment notice 1, granted 28 August 2017 – Increased throughput and green waste storage capacity; and*
- *Amendment notice 2, granted 28 September 2018 – Increased waste throughput capacity and installation of two new waste moving floor systems.*

The obligations of the licence holder have not changed in consolidating the licence. The department has not undertaken any additional risk assessment of the premises related to previous amendment notices.

In consolidating the licence, the CEO has:

- updated the format and appearance of the licence;
- deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the licence holder to obtain the form from the department's website;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

Previously issued amendment notices will remain on the department's website for future reference and will act a record of department's decision making.

**Table 2: Licences consolidated in this amendment**

Instrument	Issued	Summary of approval
L7200/1997/10	15/11/2012	Licence re-issue for a period of 5 years
L7200/1997/10	5/06/2013	Amended licence - Increased throughput of category 62 from 25,000 tonnes per annual period to 50,000 tonnes per annual period. Addition of condition restricting hours of operation of compactor and improvement conditions requiring submission of a noise assessment.
L7200/1997/10	0505/2016	Amended licence - Change of occupier name, address, extension of expiry date to 2023 and removal of outdated conditions.
L7200/1997/10	24/8/2017	Amendment notice 1 - Increased throughput and green waste storage capacity
L7200/1997/10	28/09/2019	Amendment notice 2 - Increased waste throughput capacity and installation of two new waste moving floor systems

The full consolidation of licence conditions as they relate to this revised licence are detailed in Section 5.1. Previously issued amendment notices will remain on the department's website for future reference and will act as a record of the department's decision making.

## 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 during premises construction and operation which have been considered in this amendment report are detailed in Table 3 below. **Error! Reference source not found.** also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

**Table 3: Licence holder controls**

Emission	Sources	Potential pathways	Proposed controls
Dust	Shredding of greenwaste	Air/windborne pathway causing impacts to health and amenity of sensitive receptors (rural residential dwellings)	Physical separation between premises and sensitive receptors  Existing instrument dust suppression condition requires the onsite deployment of water spray(s), wind barriers or other suitable measures necessary to control dust from operational and transport activities, stockpiles, and open areas
Noise	Receipt and processing of recyclable materials (CAT930 front end loader and Wastech S4000 waste compactor)	Air/windborne pathway causing impacts to health and amenity of sensitive receptors (rural residential dwellings)	Physical separation between premises and sensitive receptors  Limited hours of operation  Containment of recyclable material unloading and compaction activities to Recyclables Handling Facility
	Shredding of greenwaste (Redback, - Trekker, Viper or Scorpion)		Physical separation between premises and sensitive receptors  Limited hours of operation
Odour	Receipt and handling of comingled recycling contaminated with putrescible waste	Air/windborne pathway causing impacts to health and amenity of sensitive receptors (rural residential dwellings)	Physical separation between premises and sensitive receptors  Containment of recyclable material unloading and compaction activities to Recyclables Handling Facility

Emission	Sources	Potential pathways	Proposed controls
Smoke	Upset conditions (fire) within Recyclables Handling Facility	Air/windborne pathway causing impacts to health and amenity of sensitive receptors (rural residential dwellings)	Waste segregation (separation distances) Site operation and hygiene Thermal detection system including heat sensing cameras with external monitoring Provision of onsite fire-fighting equipment (fire extinguishers and fire-hose reels) Fire hydrant system with external hydrants connected to a ring main with booster connection
Contaminated fire debris and washwaters		Infiltration to soil and groundwater or overland flows causing impacts to health of environmental receptors and groundwater users	Existing requirements for the containment of contaminated runoff Portable spill containment barriers or bunds which would be used to divert contaminated water towards to internal on-site swales

### 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 from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 4 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)). The location of the identified receptors in relation to the premises (indicated in pink) is illustrated in Figure 1 below. The southeastern premises boundary directly abuts an adjoining prescribed premises, the Water Corporation - Mandurah No 1 Wastewater Treatment Plant (L5950/1991/11), a category 54 - Sewage facility.

**Table 4: Sensitive human and environmental receptors and distance from prescribed activity**

Receptor ID	Human receptors	Distance from prescribed activity
H1	Rural residential dwelling, 2- 4 Marri Court, Parklands	Approximately 160 m southeast of premises boundary
H2	Rural residential dwelling, 3 Marri Court, Parklands	Approximately 215 m southeast of premises boundary

H3	Meadow Springs Reserve (R21319) and Sports Facility, Oakmont Avenue, Meadow Springs (Public Recreation)	Approximately 182 m west of premises boundary
H4	Residential premises, Elkridge Turn, Meadow Springs	Approximately 160 m north of premises boundary
H5	Frederick Irwin Anglican School, 33-36 Gordon Road, Mandurah	Approximately 480 m southwest of premises boundary
H6	RAAFA Estate Meadow Springs, 41 Portrush Parade, Meadow Springs	Approximately 375 m west of premises boundary
<b>Receptor ID</b>	<b>Environmental receptors</b>	<b>Distance from prescribed activity</b>
E1	Groundwater (private bores)	Groundwater approximately 10.5 metres below ground level (Groundwater salinity 500-1000 mg/L)  Multiple private bores within neighboring rural residential properties
E2	Reserve 29777 (Public Recreation)	Approximately 100 m east of premises boundary
E3	Goegrup Lake - Conservation Category Wetland, and Class 3 Reserve (R 26351)	Approximately 1.2 km south east of premises boundary
E4	Indian Ocean	Approximately 2 km west of premises boundary





**Figure 1: Sensitive environmental and human receptors**



## 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 5.

The revised licence L7200/1997/10 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. waste receipt and processing activities.

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

**Table 5: Risk assessment of potential emissions and discharges from the premises during construction, commissioning, and operation**

Risk Event					Risk rating <sup>1</sup>  C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls				
Operation								
Recyclable waste receipt, storage, and handling	Noise	Air/windborne pathway causing impacts to health and amenity of sensitive human receptors	Rural residential properties	Refer to Section 3.1	C = Slight L = Unlikely <b>Low risk</b>	Y	Condition 22	N/A
	Odour	Air/windborne pathway causing impacts to health and amenity of sensitive human receptors	Rural residential properties	Refer to Section 3.1	C = Slight L = Possible <b>Low risk</b>	Y	Condition 3, 10 and 22	N/A

Risk Event					Risk rating <sup>1</sup>	Licence holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls	C = consequence L = likelihood <b>Low risk</b>			
Shredding of green waste	Dust	Air/windborne pathway causing impacts to health and amenity of sensitive human receptors	Rural residential properties	Refer to Section 3.1	C = Slight L = Rare <b>Low risk</b>	Y	Condition 8, 9 and 23	N/A
	Noise	Air/windborne pathway causing impacts to health and amenity of sensitive human receptors	Rural residential properties	Refer to Section 3.1	C = Slight L = Unlikely <b>Low risk</b>	Y	Condition 23	N/A
Upset conditions (fire)	Smoke	Air/windborne pathway causing impacts to health and amenity of sensitive human receptors	Private school, rural residential properties, Meadow Springs Reserve	Refer to Section 3.1	C = Moderate L = Possible <b>Medium risk</b>	N	Condition 11 and 21 <b><u>Conditions 20 and 26</u></b>	The required FEMP requested by the department is still outstanding
	Fire debris and washwaters	Overland flow, infiltration to soil and underlying groundwater with impacts on groundwater users and groundwater dependent ecosystems	Private school, rural residential properties, Meadow Springs Reserve	Refer to Section 3.1	C = Moderate L = Possible <b>Medium risk</b>	N	Condition 11 and 21 Conditions 20 and 26	The required FEMP requested by the department is still outstanding

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.

*Environmental Protection Act 1986*

Licence: L7200/1997/10

File number: 2010/008332-1~1

## 4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

**Table 6: Consultation**

Consultation method	Comments received	Department response
Department of Fire and Emergency Services advised of proposal (06/11/2020)	No comments received	N/A
Local Government Authority (City of Mandurah) advised of proposal (12/11/2020)	No comments received	N/A
Licence holder was provided with draft amendment on (22/02/2021)	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.

### 5.1 Summary of amendments

Table 7 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the licence as part of the amendment process.

**Table 7: Summary of licence amendments**

Condition no.	Proposed amendments
Premises details	Premises address amended to reflect subdivision of parent lot
Prescribed premises category description and Assessed design capacity	Premises category 61A added to licence to accommodate processing of green waste at the premises, with an assessed design capacity of 10, 000 tonnes per annual period Permitted combined solid waste acceptance increased to a maximum of 75,000 tonnes per annual period Permitted green waste acceptance limited to 10, 000 tonnes per annual period
1, Table 1	Previous waste acceptance conditions amalgamated into a waste acceptance table
2	New condition inserted which outlines requirements for the handling of non-conforming waste loads presented for unloading at the premises
3, Table 2	Previous waste handling conditions amalgamated into a waste processing table
9	New condition inserted to mitigate potential offsite dust impacts

Condition no.	Proposed amendments
10	New condition inserted to mitigate offsite odour impacts
18	New condition inserted stipulating requirement for removal and disposal of liquid waste spills
19	New condition inserted stipulating requirement for storage accumulated liquids and residues from spill cleanup activities
20	New condition inserted stipulating requirements for fire management, response and cleanup.
21	New condition inserted requiring licence holder to notify CEO of any fire or malfunctions at the premises
22	Previous condition amended to stipulate permitted hours of operation for the waste compactor units within the Waste Transfer Shed and the Recyclables Handling Facility
23	New condition inserted stipulating permitted hours of operation for green waste shredding activities
24	Previous condition replaced with current, standard AACR condition
Definitions	'Green waste' definition updated 'Household Hazardous Waste' definition updated Definitions of the 'Controlled Waste Regulations', 'Landfill Definitions' and 'waste type' inserted
Figure 1	Revised premises map with revised premises boundary inserted
Figure 4	Diagram of Recyclables Handling Facility internal floor plan inserted
Schedule 2	Household Hazardous Waste list inserted

**Table 8: Consolidation of licence conditions in this amendment**

Existing condition	Condition summary	Revised licence condition	Conversion notes
G1	Annual reporting requirements	24	Licensee to licence holder
G2	Annual Audit Compliance Report requirements	25	Previous condition replaced with current, standard AACR condition
G3	Approved works	n/a	deleted
G4	Departure from approved works	n/a	deleted
G5	Provision of engineering certification to the CEO	n/a	deleted
G6	Provision of works departure details to the CEO	n/a	deleted
Table 1	Infrastructure and equipment requirements table	n/a	deleted
S1	Waste acceptance	1	Revised condition with associated table

Existing condition	Condition summary	Revised licence condition	Conversion notes
-	Waste acceptance table	Table 1	Permitted waste types incorporated into a waste acceptance table
-	Non-conforming waste management	2	New condition inserted
-	Waste processing	3	New waste processing condition inserted
-	Waste processing table	Table 2	New specification table inserted which consolidates previous conditions
-	Waste stockpile management	4	New condition
S2	Asbestos waste	n/a	Deleted, Asbestos receipt requirements incorporated into waste acceptance and waste processing tables
S3	Waste removal and disposal	n/a	Deleted, Waste handling requirements incorporated into waste processing table
S4	Storage of tyres	n/a	Deleted, Tyre handling requirements incorporated into waste processing table
S5	Storage of household hazardous waste	n/a	Deleted, Hazardous waste storage and handling requirements incorporated into waste processing table
S6	Location of waste stockpiles	n/a	Deleted, Stockpile requirements incorporated into waste processing table
S7	Green waste storage	n/a	Deleted, Green waste storage requirements incorporated into waste processing table
S8(a)	Waste transfer station waste retention	n/a	Deleted, Waste retention restrictions incorporated into waste processing table
S8(b)	Waste transfer station push pit cleaning	n/a	Deleted, Push-pit wash-down requirements incorporated into waste processing table
S9	Internal vegetated buffer distance	n/a	Deleted, Requirement for maintenance of vegetation onsite is unenforceable  Waste processing table imposes restrictions on where waste may be stored and handled within the premises
S10	Security fencing	5	Licensee to licence holder
S11(a)	Windblown waste	6	Licensee to licence holder
S11(b)	Closure of waste transfer bins	7	Licensee to licence holder
S12	Storage of putrescible wastes within push pit	n/a	Deleted, Incorporated into new waste processing table
S13	Storage of car batteries	n/a	Deleted, Incorporated into new waste processing table

Existing condition	Condition summary	Revised licence condition	Conversion notes
S14	Storage of waste oil	n/a	Deleted, Incorporated into new waste processing table
A1	Dust suppression system operation	8	Licensee to licence holder
-	Dust management	9	New condition inserted
-	Odour management	10	New condition inserted
A2	Burning of waste	11	Licensee to licence holder
W1	Stormwater drainage	12	Licensee to licence holder
W2	Wastewater collection	13	Licensee to licence holder
W3	Wastewater disposal	14	Licensee to licence holder
W4	Wastewater monitoring	15	Licensee to licence holder
W5	Water sample collection in accordance with Australian standard	16	Licensee to licence holder
W6	Requirements for water sample analysis	17	Licensee to licence holder
N1	Permitted compactor operating times	22	Licensee to licence holder Addition of Recyclables Handling Facility
-	Greenwaste shredder operating hours	23	New condition inserted
-	Recovery and removal of hazardous waste spills	18	New condition inserted
-	Requirements for storage of spill residues	19	New condition inserted
-	Requirements for firefighting equipment and fire management	20	New condition inserted
-	Requirement for licence holder to notify CEO of fire or malfunctions	21	New condition inserted
-	Specified actions -FEMP submission	26	New condition inserted

## References

1. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
2. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
3. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. DWER, June 2019. *Guideline: Decision Making*. Department of Water and Environmental Regulation, Perth.
5. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Department of Water and Environmental Regulation, Perth.
6. Department of Fire and emergency Services (DFES) 2021, *Guidance Note: GN 04 Fire Prevention and Management in a Materials Recycling Facility*, Version 1. 2021



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

Condition	Summary of licence holder's comment	Department's response
1-4	Are conditions 1-4 required. These are past tense and add no context to the Licence	Noted and deleted, compliance documentation construction confirmed on 26/11/2018 (A1742283)
4, Table 1	Delete reference to construction of greenwaste hardstand as the City of Mandurah intends to do this as a component of a separate Works Approval	Noted, condition deleted
5	Delete condition as construction of greenwaste hardstand to be incorporated as part of future works approval	Noted, condition deleted
6, Table 2 – Used lead acid batteries	ULABs are not included as part of Household Hazardous Waste program, and are to be stored on in the designated area using fully sealed bins	Noted, acceptance specification amended
6, Table 2 – Household Hazardous Wastes	Acceptance specification for household hazardous wastes precludes non-domestic waste. The licence needs to permit commercial quantities of paint being received at the site.  One option is to have a separate line item for Paint Back permitting commercial volumes and household hazardous waste being restricted to 20l or kg	Receipt of increased volumes of waste paint etc. from domestic and commercial sources has not been considered as part of risk assessment. Receipt of commercial quantities of waste paint is required to be considered as part of a separate amendment application.
6, Table 2 – Inert Waste Type 2 (used tyres)	Increase permitted tyre number from 300 to 400 – flexibility required in the event of a transport or disposal location not being available	The increased risk associated with increased tyre storage has not been assessed. Increased tyre storage capacity is required to be considered as part of a separate amendment application.
6, Table 2 – Waste mineral oil	Delete mineral as this should reference oil	Waste mineral oil refers to hydrocarbon derived oils and is intended to exclude receipt of used cooking oils. Reference to waste mineral oil to remain.
7	Request condition be amended to allow provision for non-conforming wastes to be isolated to prevent risk of exposure	This is a standard condition regarding non-conforming waste and will remain

Condition	Summary of licence holder's comment	Department's response
8, Table 3 – Scrap metal	Scrap metal waste to be stored in a bin (not on a compacted hardstand)	Noted, process specification amended
8, Table 3 – Putrescible waste	Change references to 'push pit' to 'walking floor' and remove requirement for weekly wash-down  There is no longer a push pit as there is now a walking floor. Washing this down achieves nothing and adds a safety risk and an additional waste stream. The area is regularly swept.	Noted, reference to 'push pit' changed to 'moving floor' (terminology consistent with previous licence) and requirement for washing amended to cleaning
8, Table 3 – Recyclable waste	Change storage limit from 48 to 72 hours, as Friday loads may be required to be kept onsite over the weekend.	Elevated risk associated with prolonged waste storage has not been considered as part of risk assessment. Increased waste retention time required to be considered as part of a separate amendment application.
8, Table 3 – Greenwaste	Delete reference to limestone or other as regards storage hardstand  Remove requirement (g) - Deletion based on this control being picked up (a) to (d)  (h) request 4-week storage limit be increased to 6 weeks as outlets for greenwaste are sporadic and commercially problematic. Greater flexibility required.	Noted, requirement amended to 'an appropriate hardstand'  Requirement (g) is not incompatible with other requirements  Increased waste retention time required to be considered as part of a separate amendment application.
8, Table 3 – Waste mineral oil	The term mineral adds nothing	Waste mineral oil refers to hydrocarbon derived oils and is intended to exclude receipt of used cooking oils
9	The licence holder must ensure that waste stockpiles within the Recyclables Handling Facility are managed to the following specifications; (a) The volume of each stockpile must be maintained below 1, 000 m3 <del>1,200 m3</del> ; (b) Unsorted waste stockpiles must not exceed <del>4 m</del> <b>4.8 m</b> in height; (c) Unsorted waste stockpiles must be separated by at least <del>6 m</del> 5 m; (d) Open stockpile faces must be maintained at <del>45°</del> <b>60 °</b> or shallower; (e) Baled fibre, paper and plastics stockpiles must not exceed <del>4 bales high</del> <b>4.8 m in height</b> ; and (f) The front row of the baled fibre, baled paper and baled plastic stockpiles must not exceed 2 bales high	Unsorted and baled stockpile heights increased to 4.8 m in accordance with DFES GN04, section 7.2.1  The request for open face stockpiles to be maintained at a higher degree is not in line with the guidelines, and has not been risk assessed, therefore needs to be considered as part of a separate amendment application.
13	Delete as this control is captured by condition 14 - redundant condition. Control is better managed through condition 14.	Condition to be retained as it specifies required actions to mitigate potential dust emissions from the premises
20	Amend to reflect that water may not be present in summer months	Condition is sufficiently flexible to allow for no testing if wastewater collection tanks are empty

Condition	Summary of licence holder's comment	Department's response
25 (c)	Cannot be achieved immediately - need grace period to comply	Noted, specification deleted and requirement to formulate engineering options to curtail offsite firefighting washwater emissions inserted into specified action condition 26 – FEMP.
25 (d)	<p>Insert: any "contained/captured contaminated fire wash-water resulting from a fire from the waste stockpiling activities.</p> <p>Note: significant engineering design required for the weighbridge and or office. - built on a hill. more than happy for DWER to visit to understand rationale</p>	Noted, requirement amended to refer to accumulated wash-water
27 & 28	Delete conditions as noise emissions are managed under the Noise Regulations	Hours of operation have been set as a control to mitigate noise impacts on closest residential receptors. Conditions to remain.

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
<b>Application type</b>					
Works approval	<input type="checkbox"/>				
Licence	<input type="checkbox"/>	Relevant works approval number:		None	<input type="checkbox"/>
		Has the works approval been complied with?			Yes <input type="checkbox"/> No <input type="checkbox"/>
		Has time limited operations under the works approval demonstrated acceptable operations?			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?			Yes <input type="checkbox"/> No <input type="checkbox"/>
		Date Report received:			
Renewal	<input type="checkbox"/>	Current licence number:			
Amendment to works approval	<input type="checkbox"/>	Current works approval number:			
Amendment to licence	<input checked="" type="checkbox"/>	Current licence number:	L7200/1997/10		
		Relevant works approval number:		N/A	<input checked="" type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received		14/05/2020			
<b>Applicant and Premises details</b>					
Applicant name/s (full legal name/s)		Cleanaway Pty Ltd			
Premises name		Gordon Road Transfer Station			
Premises location		<del>Lot 4304 on Plan 193020</del> LOT 300 ON PLAN 401608 Corsican Place PARKLANDS WA 6180			
Local Government Authority		City of Mandurah			
<b>Application documents</b>					
HPCM file reference number:		2010/008332-1			
Key application documents (additional to application form):		Management plan			
<b>Scope of application/assessment</b>					
Summary of proposed activities or changes to existing operations.		Capture of activities occurring within Recyclables Handling Facility, inclusion of provision for the reconstruction of existing compacted limestone greenwaste hardstand and addition of Category 61A to capture onsite mulching of greenwaste			

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity	Description of proposed amendment
57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored	Less than 300 tyres at any one time	Less than 300 tyres at any one time	No change
61A	N/A	10, 000 tonnes per annual period	Insertion of category to capture green waste processing activities undertaken at the premises
62: Solid waste depot: premises on which waste is sorted, or stored, pending final disposal or re-use.	75,000 tonnes per annual period	75,000 tonnes per annual period	<ul style="list-style-type: none"> <li>• Inclusion of provision for the reconstruction of the greenwaste hardstanding; and</li> <li>• Capture of storage and handling activities within Recyclables Handling Facility</li> </ul>

#### 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"/>	Cleanaway Pty Ltd occupy the site under a contractual agreement with the City of Mandurah
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Cleanaway Pty Ltd occupy the site under a contractual agreement with the City of Mandurah

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: N/A No clearing is proposed.
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.
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: N/A Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Regional office: Swan Avon / Mid-West Gascoyne / Kwinana Peel / North West / South West / Goldfields / South Coast
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <u>WQPN 25</u> )? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 type="checkbox"/> No <input checked="" type="checkbox"/>	
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"/>	

<p>Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i>?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Classification: N/A / possibly contaminated – investigation required (PC–IR) / not contaminated – unrestricted use (NC–UU) / contaminated – restricted use (C–RU) / remediated for restricted use (RRU) / contaminated – remediation required (C–RR) / decontaminated (Decon)</p> <p>Date of classification: N/A</p>
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