



Application for Licence Amendment

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

Licence Number	L7200/1997/10
Licence Holder	Cleanaway Pty Ltd
ACN	000 164 938
File Number	DEC6825/1~5
Premises	Gordon Road Transfer Station Lot 300 On Plan 401608 Corsican Place PARKLANDS WA 6180 Legal description – As defined by the Premises maps attached to the Revised Licence
Date of Report	13 November 2023
Decision	Revised licence granted

Abbie Crawford

A/Manager, Waste Industries

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

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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 WA 6180.

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.

2. Scope of assessment

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>.

Application summary

On 17 April 2023, the licence holder submitted an application to the department to amend Licence L7200/1997/10 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The licence holder proposes to increase the throughput capacity of Category 62 from 75,000 to 91,000 tonnes per annum. The additional 16,000 tonnes of waste consists of recyclable waste including paper, cardboard, plastic, glass, aluminium and steel. These additional waste types were added to the licence in a previous licence amendment, however the overall throughput for Category 62 was not increased at the time.

The existing licence contains a condition requiring the submission of a detailed Fire and Emergency Management Plan (FEMP) by 12 September 2021. A FEMP was provided on 8 September 2023. During the assessment process additional information was requested from the licence holder in the form of an updated FEMP which included additional information on fire water containment.

The licence holder engaged the consultancy, Stantec Australia Pty Ltd to undertake an independent assessment to produce the updated FEMP for the premises. The report focused on the identification of fire risk and fire response processes for the premises, to fulfill the requirements of the licence.

To reduce the risk of fire posed by an increased throughput capacity of recyclable wastes, the licence holder installed an Automatic Fire Rover™ in the Recycling Shed that operates 24 hours a day 7 days a week. The system uses an infrared camera to monitor the tipping area to detect areas with increased heat to extinguish fires before they start, and its firefighting ability is enhanced with a wetting agent that has fire retardant properties that protect against reignition. Early intervention and application of a controlled fire extinguishing product directly to a developing fire significantly reduces the amount of water required, reducing the subsequent cleanup time and run-off post-fire.

The licence holder is also seeking to renew the existing licence in conjunction with the amendment. A full review or risk assessment of emissions and discharges from the premises has not been conducted for the renewal of the licence.

This amendment is limited only to changes to Category 62 activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 57 or 61A have been requested by the licence holder. 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
62	75,000 tonnes per annum	91,000 tonnes per annum	The amendment would increase the throughput of Category 64 for recyclables waste from 75,000 up to 91,000 tonnes per annum.

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.

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 2 below. Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Dust	Truck movements and waste delivery/removal	Air/windborne pathway	<p>Existing licence controls:</p> <p>The licence holder must operate the dust suppression system within the waste transfer shed when dust is evident, and erect wind barriers around any open waste stockpiles to prevent fugitive dust emissions.</p> <p>The licence holder shall ensure that any dust emitted from the premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the premises.</p>
Noise	Truck movements and waste delivery/removal	Air/windborne pathway	<p>Existing licence controls:</p> <p>The licence holder shall ensure that waste compactor units within the Waste Transfer Shed and the Recyclables Handling Facility Recycling Shed are operated only between the hours of 07:00 and 19:00, Monday to Sunday (including public holidays).</p>
Windblown waste	Waste stockpiles	Air/windborne pathway	<p>Existing licence controls:</p> <p>Licence holder shall ensure waste transfer bins are covered before leaving the premises to prevent the generation of windblown waste.</p> <p>The licence holder shall maintain a security fence around the perimeter of the premises to effectively control windblown waste and restrict access to the premises.</p> <p>The licence holder shall ensure windblown waste is contained within the boundaries of the premises.</p>
Smoke/Fire	Waste stockpiles	Air/windborne pathway	<p>Installation of automatic Fire Rover™ system in the Recycling Shed, maintained with daily inspections to ensure it is functional 24/7 to extinguish potential fires in the Recycling Shed tipping area.</p> <p>The amount of waste stored on the premises at any given time will not increase.</p>
Fire water	Waste stockpiles	Overland runoff	<p>Fire water produced by the Fire Rover™ system in the event of a fire will be contained by push walls and fixed bunding / mountable kerbing in the Recycling Shed. The proposed bund will have a height of 100 mm, comprising of fixed elements or mountable kerbing.</p>

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'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 (*Guideline: Environmental siting* (DWER 2020)).

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

Human receptors	Distance from activity / prescribed premises
Rural residential dwelling, 2-4 Marri Court, Parklands	Approximately 160m southeast of premises boundary
Rural residential dwelling, 3 Marri Court, Parklands	Approximately 215m southeast of premises boundary
RAAFA Estate Meadow Springs, 41 Portrush Parade, Meadow Springs	Approximately 375 metres west of premises boundary
Residential premises, Elkrigde Turn, Meadow Springs	Approximately 160 metres north of premises boundary
Frederick Irwin Anglican School, 33-36 Gordon Road, Mandurah	Approximately 480m southwest of premises boundary
Meadow Springs Reserve (R21319) and Sports Facility, Oakmont Avenue, Meadow Springs (Public Recreation)	Approximately 182m west of premises boundary
Environmental receptors	Distance from activity / prescribed premises
Groundwater (private bores)	Groundwater approximately 10.5 metres below ground level (Groundwater salinity 500-1000 mg/L) Multiple private bores within neighbouring rural residential properties
Reserve 29777 (Public Recreation)	Approximately 100 m east of premises boundary
Goegrup Lake - Conservation Category Wetland, and Class 3 Reserve (R 26351)	Approximately 1.2 km southeast of premises boundary
Indian Ocean	Approximately 2 km west of premises boundary

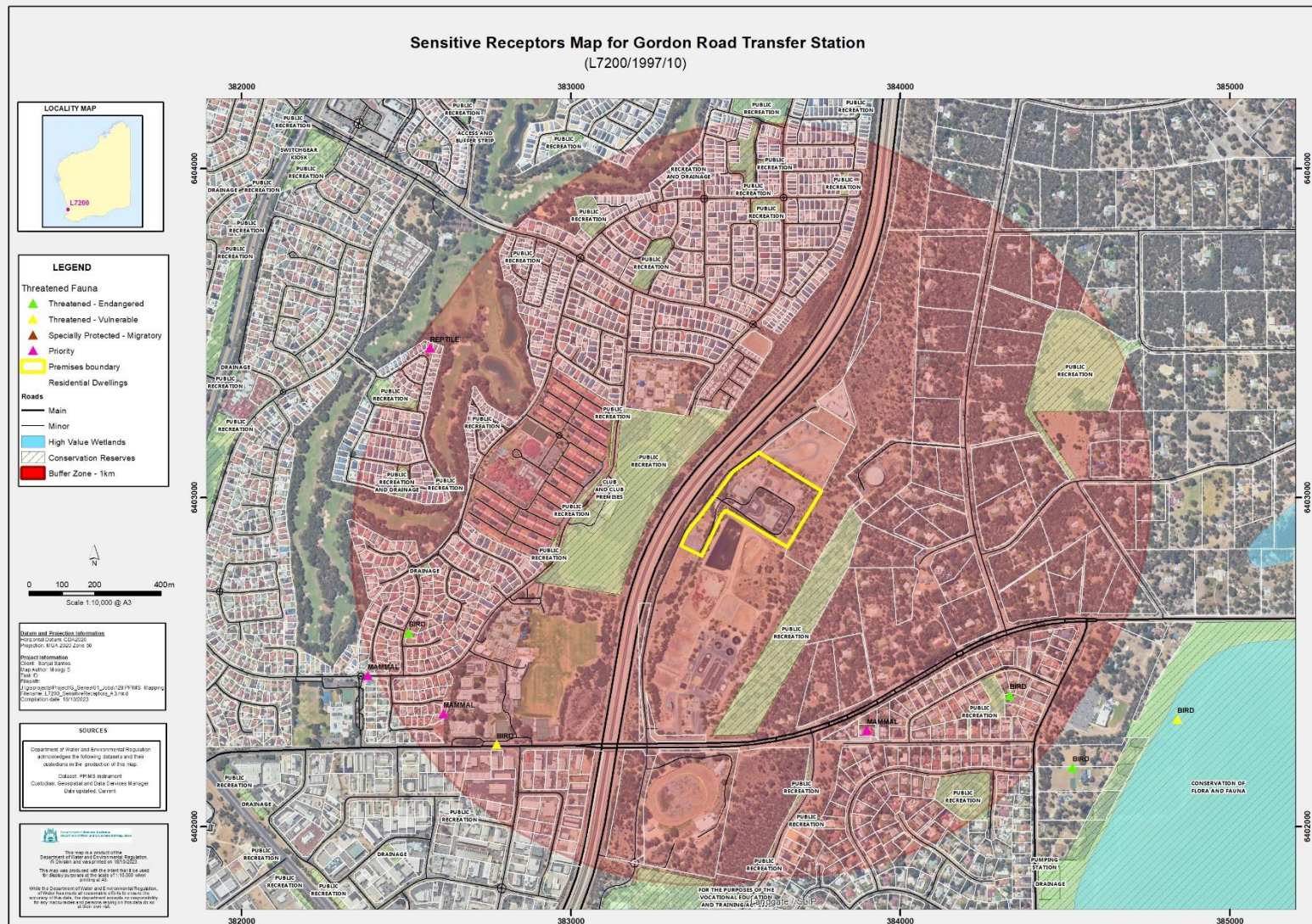


Figure 1: Distance to sensitive receptors within 1 kilometer radius

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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 and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages 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 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 L7200/1997/10 that accompanies this Amendment Report authorises emissions associated with the operation of the premises i.e. waste collection 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				
Operation								
Increased throughput of recyclable wastes by 16,000 tonnes per annum	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Marri Court Residences 160 m southeast Public recreation reserve 100 m east	Refer to Section 3.1	C = Major L = Possible High Risk	N	Condition 11, 20, 21 <u>Conditions 3, 4, 20</u>	The department has reviewed the updated Fire and Emergency Management Plan (FEMP) for the premises and found that it contains sufficient detail to inform the risk of fire at the premises. Green waste stockpiles will be spaced 41 m apart to reduce the risk of fire. Condition 3 has been updated to reflect this. Comingled waste stockpiles in the Recycling Shed will be limited to 10 m in length, and card board stockpiles will not exceed 17.5 m in length along the rear push wall to reduce the risk of fire. Condition 4 has been updated to reflect this.
	Contaminated firewater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Geogrup Lake 1200 m southeast	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition 20	N/A
	Windblown waste	Air/windborne pathway causing impacts to health and amenity	Marri Court Residences 160 m southeast	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Y	Condition 6 & 7	N/A

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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				
			Geogrup Lake 1200 m southeast					
	Dust	Air/windborne pathway causing impacts to health and amenity	Marri Court Residences 160 m southeast	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 8 & 9	N/A
	Noise	Air/windborne pathway causing impacts to health and amenity	Marri Court Residences 160 m southeast	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 22	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 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 was provided with draft amendment on 19/10/2023	<p>On 09/11/2023 licence holder replied with comments:</p> <ul style="list-style-type: none"> (a) Requested e-waste and scrap metal waste type headings in Table 2 to be swapped around, due to an error made by the department in a previous licence amendment. (b) 41 metre windrows between green waste stockpiles agreed to by applicant. (c) Requested changes to stockpile length requirements in the Recycling Shed, as per the updated FEMP provided on 08/11/2023. (d) Requested to remove requirement to add rubber toe bucket to front end loader in the Waste Transfer Shed. 	<p>On 10/11/2023 the department made the following changes to the licence:</p> <ul style="list-style-type: none"> (a) Changes to Table 2 made as requested. (b) No changes required. The department notes that there is only one greenwaste stockpile so 41 m, as stated in the FEMP, is achievable. (c) Changes to stockpile length requirements made as requested. (d) The department notes advice from the applicant that it is not practicable to use a rubber toe bucket. It also noted that the FEMP risk assessment for fire has been downgraded to moderate. Changes made as requested.

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.

Summary of amendments

Table 6 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 6: Summary of licence amendments

Condition no.	Proposed amendments
N/A	<p>Licence renewal for 10 years</p> <p>Updated expiry Date: 16 November 2033</p>
N/A	Updated Prescribed Premises Category table to reflect new increased throughput capacity from 75,000 up to 91,000 tonnes per annum.
Condition 1	Updated to reflect the increased throughput capacity for recyclable wastes from 75,000 up

Condition no.	Proposed amendments
Table 1	to 91,000 tonnes per annum.
Condition 3 Table 2	<p>Table updated with naming changed from Recycling Handling Facility to Recycling Shed to reflect the name used in the FEMP and licence holder correspondence.</p> <p>Condition 3 Table 2 updated with FEMP recommendations to reduce the risk of fire on the premises: Spacings of 41 metres are required between green waste windrows as per FEMP recommendation.</p> <p>E-waste and scrap metal waste type headings in Table 2 swapped with each other, due to an typographical error made by the department in a previous licence amendment.</p> <p>Condition updated to reflect the proper Table labelling for Waste type.</p>
Condition 4	<p>Infrastructure name updated from Recycling Handling Facility to Recycling Shed to reflect the name used in the FEMP and licence holder correspondence.</p> <p>Condition 4 updated with FEMP recommendations to reduce the risk of fire on the premises: Comingled waste stockpiles in Recycling Shed limited to 10 metres in length along the rear push wall, and card board waste piles must not exceed 17.5 metres in length along the rear push wall.</p>
Condition 20	<p>Condition 20 updated with FEMP recommendations to reduce the risk of fire on the premises:</p> <p>(b) ensure that all firefighting equipment and systems are in good working order, and capable of controlling a loose material fire in accordance with the requirements of AS 1851:2012;</p> <p>(g) Ensure the Fire Rover™ is maintained to extinguish potential fires at all times in the Recycling Shed tipping area; and</p> <p>(h) In the event that the Fire Rover system is offline, operations within the Recycling Shed are to be paused until it is back online.</p>
Condition 22	Condition for Operating times updated with new infrastructure name from Recycling Handling Facility to Recycling Shed to reflect the name used in the FEMP and licence holder correspondence.
Condition 26	Condition deleted due to FEMP submission.
Definitions table	Updated to include: AS 1851:2012 which refers to the Australian Standard for Routine service of fire protection systems and equipment.
Schedule 1: Maps Figure 1: Map of the prescribed premises and primary infrastructure	Figure updated for visual clarity and accuracy for reference to the premises boundary and the primary infrastructure locations onsite.
Schedule 1: Maps Figure 2: Gordon Road Transfer Station Site Plan	Figure caption updated to reflect updated name of the premises.

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: Application validation summary

SECTION 1: APPLICATION SUMMARY				
Application type				
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 type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None <input type="checkbox"/>
Date application received		17/04/2023		
Applicant and Premises details				
Applicant name/s (full legal name/s)		Cleanaway Pty Ltd		
Premises name		Gordon Road Transfer Station		
Premises location		Corsican Place, LOT 300 ON PLAN 401608 PARKLANDS WA 6180		
Local Government Authority		City of Mandurah		
Application documents				
HPCM file reference number:		L2010/008332-1~2		
Key application documents (additional to application form):		None		
Scope of application/assessment				

Summary of proposed activities or changes to existing operations.	<p><i>Licence amendment</i></p> <p>To utilise the 16,000 tpa requested and assessed previously from a licence amendment granted by the department on 14/06/2022. The amendment would increase the throughput of Category 64 from 75,000 tpa up to 91,000 tpa.</p> <p>Site operations will not be altered.</p>	
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 (amendments only)
Category 57: Used tyre storage	Less than 300 at any time	N/A
Category 61A: Solid waste facility	10, 000 tpa	N/A
Category 62: Solid waste depot	75,000 tpa	91,000 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 checked="" 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 checked="" type="checkbox"/> : The City owns the Waste Management Centre located at 80 Corsican Place, Parklands and the facility is managed by Cleanaway Pty Ltd under contract with the City. Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:

Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Approval: Expiry date: If N/A explain why? Premises operated on behalf of 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 checked="" type="checkbox"/> Regional office: Kwinana Peel
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 checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, 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 Date of classification: N/A</p>
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