



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Total Waste Management Pty Ltd

Licence: L7639/2000/8

Registered office: 65 Pirrama Road
PYRMONT NSW 2009

ACN: 077 898 607

Premises address: Total Waste Management
113 Ewing Street
WELSHPOOL WA 6106
Being Part Lot 278 on Plan 3033123 as depicted in Schedule 1.

Issue date: Thursday, 29 October 2015

Commencement date: Sunday, 1 November 2015

Expiry date: Wednesday, 31 October 2035

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by: Lauren Fox
Licensing Officer

Decision Document authorised by: Alan Kietzmann
Delegated Officer



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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	61	55,000 tonnes per annual period
	62	550 tonnes per annual period
Application verified	Date: 18/09/2015	
Application fee paid	Date: 01/10/2015	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	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"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Environmental Protection Swan Coastal Plain Lakes Policy 1992		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> The nearest lake that applies to this policy is located 665 metres north-east from the Premises.		



3 Executive summary of proposal and assessment

Total Waste Management Pty Ltd (TWM) operates a waste treatment facility, which receives liquid controlled waste including sludge waste under the *Environmental Protection (Controlled Waste) Regulations 2004* for storage, processing and transfer to another facility. TWM also receives solid waste from time to time for storage, transfer and/or disposal to landfill. TWM is a Western Australian joint venture between Transpacific Industries and Veolia Environmental Services. They operate several waste management premises in Western Australia. The primary business is the disposal of liquid waste from a wide range of customers both industrial and residential.

The premises is located within the City of Canning in an area zoned as General Industry. The City has advised that planning approval has been granted for the existing operations and that there is no specified expiry date for this approval.

The Department of Water's 'Perth Groundwater Atlas' software indicated the depth to groundwater is approximately 7 metres below ground level with an approximate aquifer thickness of 23.5 metres. The Perth Groundwater Atlas has also identified that groundwater is considered marginally brackish (Total dissolved solids: 500 – 1000 mg/L) with low risk of iron staining and moderate to low risk of acid sulfate soil. This premises is not located within any Public Drinking Water Source Areas.

The nearest surface water body, being a Water Corporation compensation basin, is located immediately adjacent to the north-eastern portion of Lot 278. This premises is within an area subject to the Environmental Protection Swan Coastal Plain Lakes Policy 1992. The nearest lake that applies to this policy is located approximately 665m north-east of the premises, therefore the requirements of this Policy do not apply to the site.

The nearest residential area is located approximately 420 m south-west of the premises and extends to the south and east of the premises. The Environmental Protection Authority's Guidance Statement No. 3, *Separation Distances between Industrial and Sensitive Land Uses*, June 2005 (EPA GS3), recommends a buffer distance of 200 metres for a waste depot and to be determined on a case by case basis for liquid waste premises. EPA GS3 considers dust, noise and odour to be the main emissions from these types of operations.

The Premises is authorised to accept a wide range of controlled waste types in both liquid and solid form. Controlled wastes are either decanted, consolidated, neutralised, aggregated and treated (biological, chemical or physical) depending on each waste type. Any gaseous discharges are vented via a wet scrubber. The tanks are protected from overflow by an interceptor tank on the vacuum line to the vacuum pump. The storage tanks are located within a bunded area which the occupier has advised was constructed in compliance with the Australian Standard (AS1940.1993).

TWM shares Lot 278 with Nationwide Oil Pty Ltd, who occupy the western portion of the site and operate a chemical/oil recycling prescribed premises (category 39) under licence L8272/2008/2. The two premises share some common areas which are depicted in the licence.

All wastewater generated through the process is treated before discharging into Water Corporation's sewer via discharge permit number 18431. A parallel batch treatment system is used which allows for continuous disposal to sewer. Treated wastewater quality is to comply with the Water Corporation's water quality criteria prior to its discharge to the sewer and is not regulated by DER.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.1 – L1.2.3	<p>The occupier has a triple interceptor and scrubber system on site as part of the Premises' pollution control equipment. Condition 1.2.1 has been included on the licence to require the occupier to maintain all pollution control and monitoring equipment in accordance with the manufacturer's specifications which assists in providing greater certainty and reliability in monitoring results as well as assisting in the reduction of emissions from the premises. This condition replaces in part, condition W4(a) of the previous licence which required drains, oil traps and sumps to be kept clean for effective system performance.</p> <p>Condition W5(a) of the previous licence required all environmentally hazardous chemicals, including wastewaters, solid wastes, fuel, oil or other hydrocarbons, to be stored in specified containment infrastructure. This condition has been removed from the licence and is replaced in part by Table 1.3.1 in Appendix A and is referenced in condition 1.3.4. The occupier stores reagent and hazardous wastes in designated storage areas which the occupier has advised complies with the <i>Dangerous Good Safety Regulations 2007</i>. The occupier has indicated in a previous submission of information, that all dangerous goods are stored in accordance with the relevant Department of Mines and Petroleum (DMP) regulations. It is the Licensee's responsibility to ensure compliance with the DMP storage requirements.</p> <p>This premises is authorised to accept a wide range of liquid wastes including environmentally hazardous materials. Condition 1.2.2 has been included to require that any spills of environmentally hazardous materials outside of the containment systems, are managed appropriately. This condition replaces in part, condition W5(b) of the</p>	<p>Application supporting documentation</p> <p>Total Waste Management Pty Ltd, Welshpool Operations Site, Compliance Report (Sector Guidance Note IPPC S5.06) Waste Operations – Working Plan and Management System, March 2015</p> <p><i>Dangerous Good Safety Regulations 2007.</i></p>
General			



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
conditions continued		<p>previous licence.</p> <p>Condition 1.2.3 has been included on the licence to require all practicable measures to be taken at the premises to prevent stormwater from being contaminated, and where it has been contaminated, to treat it as required prior to discharge off the premises. The occupier has an existing drainage system with triple interceptor which discharges to a compensation basin. This condition replaces in part condition W3(a) of the previous licence and assists in the reduction of contaminated stormwater entering the environment.</p>	
Premises operation	L1.3.1 – L1.3.5	<p>This section includes conditions with specified limits for waste acceptance types, waste volumes and waste processes. Condition 1.3.1 has been included to require the occupier to record and investigate any exceedances of these limits. This condition assist in identifying the cause of any breach of limit which assists in reducing the breach reoccurring.</p> <p>Condition 1.3.2 requires the occupier to only bring wastes onto the site if it meets the requirements specific in Table 1.3.1 of Appendix A. This condition has been included to limit the wastes accepted at the premises to only those waste types assessed as suitable for acceptance by DER based on the Premises infrastructure. Condition 1.3.2 has been included on the licence to require the offsite removal of any wastes accepted at the Premises which do not conform to the authorised wastes types listed in Table 1.3.1. Condition 1.3.4 and 1.3.5 also refer to Table 1.3.1 of Appendix A and limit the waste processing that is authorised to be undertaken onsite to those activities assessed as suitable by DER, and to prescribe the type of infrastructure required to store each waste type. Any waste types or processed not included in Table 1.3.1 have not been assessed and are not authorised by DER.</p>	Application supporting documentation
Emissions general	L2.1.1	Limits have been set through condition 2.2.1 of the licence and therefore condition 2.1.1, regarding recording and investigation of exceedances of limits, has been	N/A



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Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		included. This condition assists in identifying the environmental impact for any discharges of water that exceed these limits, which enables action to be undertaken to try remedy the impacts.	
Point source emissions to surface water including monitoring	L2.2.1	Condition W3(a) of the previous licence required the occupier to undertake sampling of any treated water prior to being discharged offsite into the retention sump. This condition also set limits for pH, total suspended solids and oil and grease that the treated water needed to meet before it was authorised to be discharged offsite. These limits have been included into this licence as point source emissions to surface water. The monitoring of the treated water is included under condition 3.2.1. This condition assists in preventing unauthorised emissions from entering the environment. Discharges of treated water which exceed these limits may be subject to the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> .	<i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>
Monitoring general	L3.1.1 – L3.1.4	<p>Monitoring is required under condition 3.2.1 (inputs/outputs) Condition 3.1.1 has been included on the licence to specify the methodology that is required to be undertaken for the monitoring of treated stormwater. These methods assist in ensuring reliability and accuracy of results. This condition replaces in part conditions W3(b) and W3(c) of the previous licence.</p> <p>Condition 3.2.1 requires monthly monitoring of treated stormwater to be undertaken in the triple interceptor. Condition 3.1.2 has been included on the licence to specify the minimum amount of time between monthly sampling rounds. This condition assists in providing a greater representation of the monthly sampling data.</p> <p>Condition 3.1.3 has been included for the calibration of monitoring equipment as per the manufacturer's specifications. By calibrating to the manufacturer's specifications, the equipment is likely to provide more reliable results.</p> <p>In the event that the monitoring equipment cannot be calibrated in accordance with the manufacturer's specifications, or in other situations where discrepancies in calibration requirements occurs, DER needs to be made aware of this as it may impact on the</p>	N/A



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		reliability of monitoring results. Condition 3.1.4 has been included on the licence to require the occupier to notify the CEO when discrepancies or issues with calibration arise.	
Monitoring of inputs and outputs	L3.2.1	<p>Condition 3.2.1 and Table 3.2.1 have been included on the licence to specify the monitoring requirements for Premises inputs and outputs. The outputs include wastes that have left the premises, and the stormwater that has been treated prior to being discharged from the premises into the retention sump. The waste inputs include all authorised waste inputs as specified in Table 1.3.1 in Appendix A as referenced in condition 1.3.2.</p> <p>This condition has been included as a means of checking compliance with Conditions 1.3.2 (waste acceptance) and condition 2.2.2 (point source emissions to surface water) and replaces in part, conditions G2 and W3(a) of the previous licence.</p>	Application supporting documentation
Information	L4.1.1 – L4.1.4; 4.2.1, 4.2.2 and L4.3.1	<p>Condition 4.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years which assist DER in regulating the conditions of this licence.</p> <p>4.1.2 requires that any person left in charge of the Premises, is aware of the licence conditions and performs any tasks in compliance with the licence conditions which assist in operations being undertaken as specified in this licence.</p> <p>Condition 4.1.3 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR). This condition assists DER in regulating the occupier's compliance with licence conditions and allows an opportunity for DER to review the occupier's environmental performance. This condition replaces condition G4 of the previous licence.</p> <p>4.1.4 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. DER</p>	N/A



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Information continued		<p>will review these complaints as reported in the Annual Environmental Report (AER) and can consider the requirement for reassessment of any regulatory controls to address the complaints. This condition replaces condition G5 of the previous licence.</p> <p>4.2.1 requires the occupier to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition 5.1.4. The AER is also required to provide the results for the monitoring of inputs/outputs which was previously required to be submitted under condition G3 of the previous licence. The occupier is also required to provide a summary of any malfunction of pollution control equipment or any environmental incidents. DER reviews all of the data provided in the AER to assess compliance with the licence conditions and to monitor the environmental impacts from the premises.</p> <p>Condition 4.3.1 requires the occupier to notify the CEO if there is a breach of any licence limit (i.e. processing limits and limits for the discharges to surface water) and to provide a calibration report (required under condition 3.1.3) if required. The notifications required under this condition give DER sufficient notice of any environmental impacts at the premises so that DER can determine if any further action is required to address the incident.</p>	
Licence Duration	N/A	There is currently no specified expiry date on the planning approval therefore it is recommended that the licence be issued for a period of 20 years.	N/A



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
12/10/2015	Application advertised in West Australian (or other relevant newspaper) with a 7 day comment period	No comments received	N/A
14/10/2015	Application referred to interested parties listed: City of Canning	The City of Canning advised that it had no comments to make on the application. Previous correspondence with the City advised that there was no limitation to the planning approval for the Premises	Licence to be issued for a period of 20 years
20/10/2015	Proponent sent a copy of draft instrument	The occupier provided comments to DER on 21/10/2015 with minor changes to wording in the Decision Document and Licence.	The changes requested by the occupier have been incorporated where appropriate.



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High