



Application for licence renewal

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

Choose an item.	L8397/2009/3
Licence holder	Resource Recovery Solutions Pty Ltd
ACN	128 285 263
DWER file number	DER2017/001695-1
Premises	Waste Care 34 Jackson Street BAYSWATER WA 6053 Being Part of Lot 9 on Plan 33567 Certificate of Title Volume 2222 Folio 33567 As defined by the coordinates in Schedule 1 of the Licence
Date of report	22 November 2019
Decision	Licence renewal granted

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1. Definitions

Key terms relevant to this decision report and their associated definitions are listed in Table 1.

Table 1: Definitions

Term	Definition
Category / categories	Categories of prescribed premises as set out in Schedule 1 of the EP Regulations.
Decision Report	refers to this document.
Delegated Officer	An officer delegated under section 20 of the EP Act.
Department	The department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the <i>Public Sector Management Act 1994</i> and is responsible for the administration of the <i>Environmental Protection Act 1986</i> along with other legislation.
DWER's Asbestos Guidelines	means the document titled 'Guidelines for managing asbestos at construction and demolition waste recycling facilities', published by the Department of Environment and Conservation, as amended from time to time.
Emission	has the same meaning given to that term under the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of, and during this Review
Inert waste type 1	has the meaning defined in the Landfill Definitions.
Landfill definitions	means the document titled 'Landfill Waste Classification and Waste Definitions 1996' published by the CEO of DWER and as amended from time to time.
Licence Holder	Resource Recovery Solutions Pty Ltd
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Prescribed premises	This has the same meaning given to that term under the EP Act.

Term	Definition
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report
Renewal	this Licence renewal
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>

2. Licence and amendment history

Table 2 provides the amendment history for L8397/2009/3.

Table 2: Licence amendments

Instrument	Issued	Nature and extent of works approval, licence or amendment
L8397/2009/1	3/6/2010	New licence following ceased licence L8045/2005/1
L8397/2009/2	2/12/2011	Re-issued licence
L8397/2009/2	25/1/2013	DER initiated licence amendment, nil-condition licence
L8397/2009/2	14/01/2016	Proponent initiated licence amendment – transfer of ownership
L8397/2009/3	22/11/2019	This Renewal

3. Purpose and scope of assessment

A Renewal Application for Existing Licence (L8397/2009/2), which is due to expire on 6 December 2019, was received from Resource Recovery Solutions Pty Ltd (the Licence Holder) for the Waste Care facility (the Premises). The Licence Holder proposes to remove Category 61A (solid waste facility) from the Licence as the treatment of acid sulfate soils (ASS) and potential acid sulfate soils (PASS) will no longer be undertaken within the Prescribed Premises boundary. A new processing area would need to be constructed for this purpose which is currently not a priority for the Licence Holder. As a result of this, the existing Premises boundary has been amended and reduced in size to exclude the PASS treatment area.

This Decision Report presents a re-assessment under the revised Regulatory Framework of the emissions and discharges from the Premises and the site operating at the full capacity authorised under the Existing Licence.

4. Application details

The Application was received on 30 August 2019 to renew the Licence for the Premises to continue to operate as a solid waste depot (Category 62) including crushing and screening of building material (Category 13) with a combined throughput of 500,000 tonnes per annum.

Table 3 lists the documents submitted during the assessment process.

Table 3: Documents and information submitted during the assessment process

Document/information description	Date received
<i>Application Form (Licence Renewal) and supporting information L8397/2009/3, Waste Care Facility, Resource Recovery Solutions Pty Ltd</i>	30 August 2019
Additional information – email <i>Clarification required –Waste Care facility application – Response, Alan Kietzmann, 16 September 2019</i>	16 September 2019

5. Overview of existing operations

Resource Recovery Solutions took occupation of the Premises from Farfield Holdings (Capital Recycling) in 2016. The Licence Holder holds a lease for the Premises that is due to expire on the 10 January 2021, however, the lease includes two additional five-year extended term options. The Waste Care facility is located within the Bayswater Industrial area near the corner of Tonkin Highway and Collier Road, at 34 Jackson Street (Being Lot 9 on Plan 33567).

The Licence Holder currently holds an Existing Licence (L8397/2009/2) for the Waste Care facility that authorises the Prescribed Premises activities of prescribed premises categories 13, 61A and 62. The Licence Holder proposes to continue to accept, store and process (crushing and screening) up to 500,000 tonnes of building material per annual period under Categories 13 and 62 as described in Table 4 below.

The facility will no longer be undertaking the treatment of PASS soils within the Prescribed Premises, therefore Category 61A is no longer relevant and has been removed from the licence. As a result of this, the Premises boundary of the facility has been modified and slightly reduced to an area of approximately 9,500 m² in size as depicted in Figure 1 in this licence renewal. A new petrol station will be established on the land that is being excised from the Premises. There will be no Category 61A activities occurring outside of the Prescribed Premises boundary.

Table 4: Classification of premises and assessed design capacity

Category	Description	Assessed production or design capacity or throughput
Category 13	Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned.	Combined limit of 500,000 tonnes per annual period
Category 62	Solid waste depot, premises on which waste is stored, or sorted, pending final disposal or re-use.	

The Premises primarily receives construction and demolition (C&D) waste (being Inert Waste Type 1 as defined under the Landfill Definitions) from the public and the neighbouring Waste Care facility (Licence L7742/1998/7) in the form of clean-fill sand, concrete and building rubble for further processing and subsequent sales. Once the waste has been accepted, the materials are stockpiled then processed through crushing and screening equipment to create road base, drainage rock and sand products which are then sold.

5.1 Operational aspect

All loads are visually inspected by an employee who is trained in identifying asbestos at the entrance of the Premises and again at tipping point to ensure incoming loads do not contain any non-conforming materials. Any loads identified to contain non-conforming waste are rejected. The facility does not accept asbestos containing material (ACM) or leachate generating materials.

Incoming materials are stored in designated areas at the facility based on their composition and processing requirements. All incoming and product materials are stored on compacted road base mostly overlying areas of concrete and bitumen. The volumes of product stored at the Premises are dependent on market requirements and feedstock availability. However, it is estimated that 30,000 tonnes of material is likely to be stored at any one time. Stockpile heights at the Premises are limited to seven metres in height in accordance with the City of Bayswater's planning approval.

All operations are conducted on a compacted aggregate hardstand with underlying bitumen and concrete flooring in most areas. Materials are fed into a hopper by either an excavator or front-end loader and then go through a jaw crusher and a series of grates for removal of undesirable materials. A magnetic belt removes ferrous materials after the initial crushing points. A conveyor belt picking station allows manual removal of larger, non-recyclable materials and a final blower at the end of the product conveyor belt pushes any remaining lighter materials into a disposal chute. The larger materials such as fugitive wood and plastic are removed at the picking station and dropped into a chute and stored in bunkers below whilst the lighter materials are collected in a shade cloth mesh enclosure behind the main product bunker. The bunker bins are emptied on average every 10 to 14 days and are loaded into skip bins that are taken to Waste Care's neighbouring facility (L7742/1998/7) to integrate with other materials which go to landfill, or to the steel recycling collection area.

If there are any undesirable hazardous materials (ACM) detected during operations, the crushing process is immediately stopped, the crusher and belts are cleared, and the bunker stockpiles are removed and isolated until further testing is carried out. If any hazardous loads are detected, the material is removed by a controlled waste carrier to an authorised landfill site.

All materials are tested for asbestos content prior to being removed from the facility and testing is carried out in accordance with the DWER's Asbestos Guidelines. Materials that have been processed are stockpiled with a three metre separation gap in line with asbestos testing requirements. The various product materials are stockpiled into three distinctive areas to reflect asbestos testing which include waiting for testing to be conducted, waiting for test results or tests that have been cleared. The results for asbestos testing undertaken at the facility to date have not detected the presence of ACM.

5.2 Infrastructure

A full list of site infrastructure and equipment utilised for the C&D processing for categories 13 and 62 are detailed in Table 5 below and with reference to Figure 1.

Table 5: Infrastructure and equipment

Ref	Infrastructure or Equipment	Site Plan reference
1	Crushing plant: - Maximum throughput of 100 tonnes/hour - Sound power level 115dBA	Site Layout Plan in Figure 1
2	Screener (McKloskey):	Site Layout Plan in Figure 1

Ref	Infrastructure or Equipment	Site Plan reference
	- Maximum throughput of 100 tonnes/hour - Sound power level 98dBA	
3	Front-end loader	Mobile equipment
4	Excavator	
5	Bobcat	
6	10,000L Water cart	

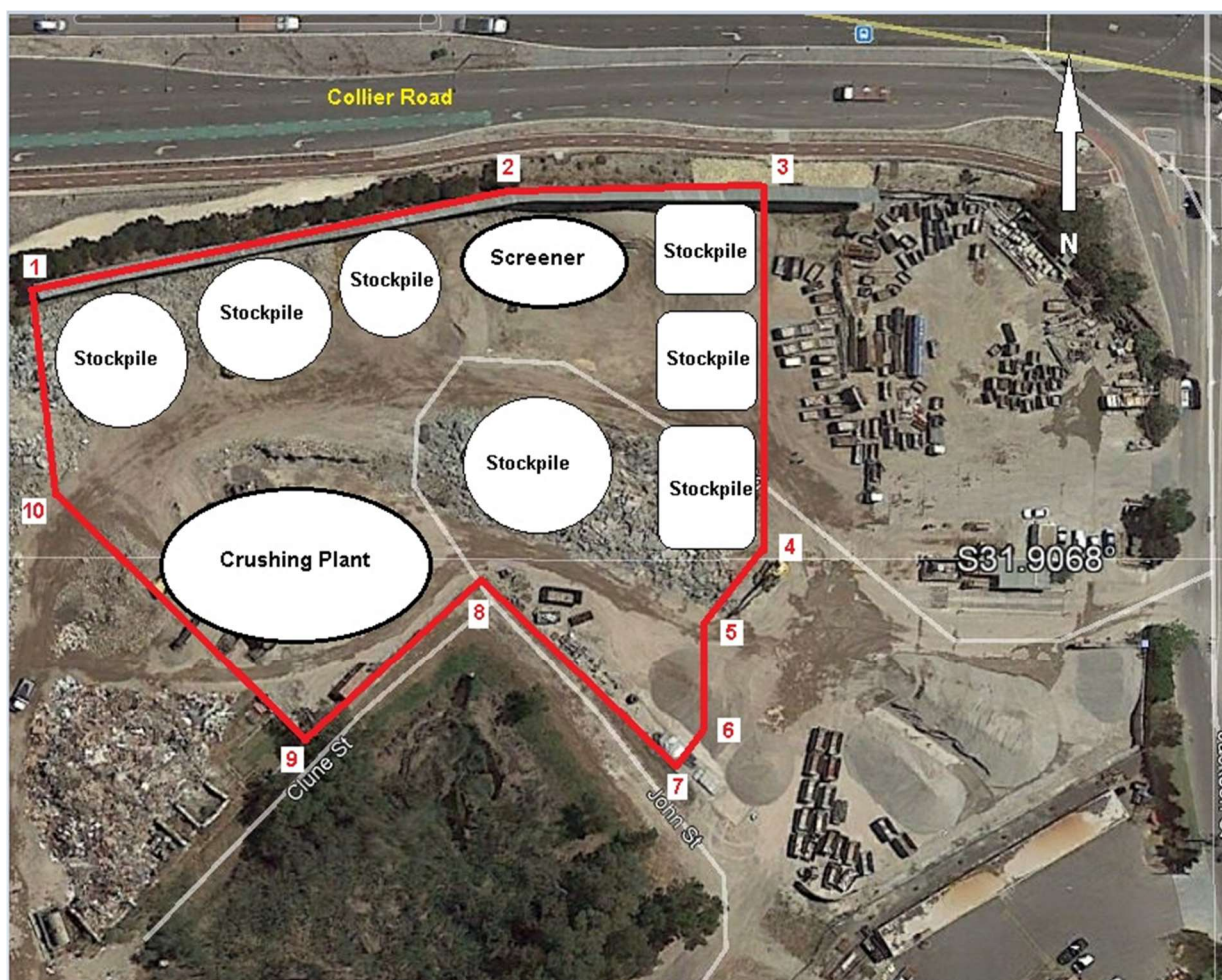


Figure 1: Site Layout Plan

6. Legislative context and other approvals

6.1 Contaminated sites

Historically, the site has been used as a metals recycling facility from 1983 to 2004, a land use that has the potential to cause contamination. The site was reported to the former Department of Environment and Conservation following a fire that occurred within the scrap metal stockpiles located on the northern portion of the site in December of 2004. A contamination assessment determined that heavy metals and polychlorinated biphenyls exist in the soils along the

perimeter of the site and in soils under reinforced concrete on site. A number of soil and groundwater investigations and stages of remedial works have since been undertaken to clean the site up for the continued use as an industrial premises and the site was classified as a 'Remediated for restricted use' (commercial/industrial use only) under the *Contaminated Sites Act 2003* on 28 February 2011. The site has since been operating as an industrial recycling facility mainly for the crushing of demolition materials. A memorial has been listed on the certificate of title stating the sites classification.

6.2 Other relevant approvals

The Premises is located within an area zoned as 'General Industry' as defined by the City of Bayswater's District Town Planning Scheme No. 24. The Licence Holder obtained planning approval from the City of Bayswater as detailed in **Table 6** below.

Table 6: Relevant approvals

Legislation	Number	Approval
<i>Planning and Development Act 2005</i>	DA11-0436	Planning approval granted on 30 March 2012 for the purpose of the activities associated to C&D processing operations and the fence placement adjoining Collier Road.
<i>Rights in Water and Irrigation Act 1914</i>	GWL160278	'Licence to take' groundwater issued to Resource Recovery Solutions Pty Ltd for the purpose of dust suppression for earthworks and construction purposes – expiry 28 February 2026 Annual water entitlement to Licence Holder - 1300 kL per annum

7. Emission sources, receptors, pathways and controls

7.1 Emissions

The potential for emissions to impact on sensitive receptors has been assessed in accordance with the Department's Risk Framework. A risk assessment for the operational phase has been included in this Decision Report. The key emissions considered in during premises operation are **noise, dust and asbestos fibres**.

Noting the dry and inert nature of the materials being processed, the Delegated Officer considers it unlikely that leachate emissions will be generated at the Premises.

The Licence Holder has proposed measures to assist in controlling these emissions, where necessary. The control measures are outlined in Section 8.4 below and have been considered when undertaking the risk assessment detailed in Section 9.

7.2 Potential receptors and environmental aspects

Risk is assessed as a combination of emission sources, the proximity and sensitivity of receptors to those emission sources and any pathways that can allow the emission to reach and potentially harm the receptor. Figure 2 and Table 7 below provides a summary of human and environmental receptors in proximity to the Premises which have a potential to be impacted from site activities, and the risk assessment in Section 7 considers these receptors in the context of emissions and potential pathways.

Table 7: Distance to receptors

Human receptors	Distance from activity or prescribed premises
Bayswater Residential area	Located approximately 450 metres North of the Premises
Resource Recovery Solutions Pty Ltd (Waste Care) (L7932/2004/4) – Composting facility	Located immediately west of the Premises (60 Clune Street, Bayswater)
Resource Recovery Solutions Pty Ltd (Waste Care) (L7742/1998/7) - Construction and Demolition (C&D), commercial and industrial processing facility	Located immediately south west of the Premises (50 Clune Street, Bayswater)
Jack Colin Kailis (Perth Bin Hire) (L8595/2011/1) – Solid waste recycling facility	Located approximately 50 metres south of the Premises (11 Duffy Street, Bayswater)
Cleanaway Pty Ltd (Bayswater Transfer Station) (L7102/1997/8) – Solid waste depot	Located approximately 110 metres north of the Premises (271 Collier Road, Bayswater)
Ransberg Pty Ltd (Bayswater Concrete Batching Plant) (W5787/2015/1) – Concrete batching plant	Located approximately 70 metres north of the Premises (277-279 Collier Road, Bayswater)
Environmental receptors	Distance from activity / prescribed premises
Major perennial water course (Swan River)	Located approximately two kilometers South-East of the Premises
Clune Street compensation basin	Located directly behind the Premises.
Mapped Multiple-use wetland (sumpland)	Located approximately 300 metres North-East and 445 metres South of the Premises



Figure 2: Premises siting - Distance to receptors

7.3 Pathways

As **dust**, **noise** and **asbestos fibres** are considered potential emissions, the prevailing wind direction has been considered. Using information available on the Bureau of Meteorology's website, the closest available weather station for climate data is Perth Metro station (No. 009225). Based on the climate data for Perth Metro station (January 1994 to September 2019), the prevailing wind direction is from the East in the morning and south west in the afternoon.

These pathways have been considered in the risk assessment table in Section 9.

7.4 Licence Holder controls

The Licence Holder has proposed the following management controls as part of the Application:

Table 8: Summary of emissions and Licence Holder controls

Emission (as identified above)	Source	Proposed controls
Dust	Crushing and screening operations Sand-screening activities Dust lift off from stockpiles Vehicle/heavy machinery movements	The Premises contains a designated damping down platform where all loads are wet down prior to tipping. A 10,000 L water cart retained on site is dedicated to wetting down all dusty loads before tipping and to ensure stockpiles are kept moist prior to processing. Installing a wheel wash system on site is unlikely to be practical given vehicles exiting the Premises will be using unsealed roads on the adjacent Lot (60 Clune Street) prior to entering public roads. Whilst the adjoining Lot is subject to a different licence (L7932/2004/4), the site is also occupied by the Licence Holder (Resource Recovery Solutions Pty Ltd). Given this, an outcome-based condition has been placed on

		the licence that requires all vehicles to pass over the wheel wash installed on the adjacent Premises to ensure vehicles are sufficiently free of mud prior to entering public roads. Stockpiles are limited to seven metres in height. The processing plant is fitted with a water spray system that automatically turns on when the plant is in operation to suppress dust generation which creates a moist product and reduces dust lift off when handling. Sealed traffic areas are swept daily by a licensed road sweeper to minimise dust. Perimeter fencing in excess of 7 metres in height is installed on the North (Collier Road) and West side (Tonkin Highway) of the Prescribed Premises and the processing plant operates at a floor level which minimises dust emissions. A 7.5 metre high colorbond (6 metre + 1.5 metre inward-angled) fence on top of a 1.2 metre high concrete wall is proposed to be constructed on the revised Eastern boundary of the Premises (Jackson Street) prior to December 2019. The processing plant is shut down during excessively windy conditions occur and dust emissions cannot be adequately controlled.
Noise	Crushing and screening operations Sand-screening activities Dust lift off from stockpiles Vehicle/heavy machinery movements	Site operations will occur between 6:00am to 16:30pm, Monday to Saturday (excluding public holidays). Processing commences after 7:00am when the highest assigned decibel levels can occur in accordance with the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations). The fixed plant operates at a floor level below the surrounding ground level (in all directions except the south) which provides a noise mitigation barrier. The seven metre high boundary fence line (on the West, North and East side of the Premises) and stockpiles up to seven metres high also provide a barrier to attenuate noise emissions. Noise emissions are also minimised by the plant on site and associated equipment being regularly serviced and maintained.
Asbestos fibres	Crushing and processing operations	The facility operates in accordance with an Asbestos Management Plan consistent with the <i>Guidelines for managing asbestos at construction and demolition waste recycling facilities</i> that includes the below key controls: No asbestos containing materials (ACM) are accepted on site and signage indicating this has been installed at the entry gate. Loads are inspected by trained staff for the identification of ACM at the entry of the Premises and during unloading.

		Any sand products brought in from Waste Care's neighbouring facility (Licence L7742/1998/7) are tested for ACM prior to acceptance and re-screening. An asbestos kit is kept on site in case ACM is detected. The asbestos kit includes appropriate personal protective equipment, suitable 200 micron plastic lining/identifiable bags and tape to seal wrapped materials. Any asbestos collected is removed from site and disposed of at an authorised facility. All products that have been processed on site are tested in accordance with DWER's Asbestos Guidelines prior to removal from site. Materials that have been processed are stockpiled with a three metre separation gap in line with asbestos testing requirements. Air quality monitoring testing for ACM is also undertaken by a third party bimonthly (every two months) and weekly and results are provided to the City of Bayswater in accordance with their planning approval requirements.
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Risk assessment

The identification of the sources, pathways and receptors to determine Risk Events are set out in Table 9 below, consistent with the *Guidance Statement: Risk Assessments*. Risk ratings have been re-assessed for each key emission source and take into account potential source-pathway-receptor linkages. The mitigation measures / controls proposed by the Licence Holder have been considered in determining the risk rating.

As detailed in the risk event table below (Table 9), the risk rating for dust emissions is still considered to be a medium risk, therefore a condition has been placed on the Licence to ensure dust emissions are controlled. The risk of asbestos fibres emissions also remains and is considered to be a medium risk. As a result, the conditions relating to the controls around asbestos fibres on the Licence have been updated to bring in line with current practice.

The conditions in the issued Licence, as outlined in Table 9, have been determined in accordance with the *Guidance Statement: Setting Conditions*.

Table 9: Identification of emissions, pathway and receptors during operation

Risk Event				Consequence rating	Likelihood rating	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Licence Holder controls					
Crushing and screening operations Unloading and stockpiling of wastes Vehicle/heavy machinery movements around the Premises (watercart and operation of front-end loader and hopper), including reversing alarms	Noise	Air/windborne pathway causing impacts to health and amenity of closest human receptors being neighbouring industrial premises and residential premises located approximately 450 metres North-East of the Premises.	As outlined in Section 7.4.	Minor to Moderate	Possible	Medium	The Premises is surrounded by industrial enterprises within the Bayswater Industrial Area. Noting the processing plant operates at ground level in relation to the surrounding landscape, the seven metre high stockpiles, boundary premises wall and additional controls outlined in section 7.4, these measures are likely to provide sufficient attenuation before reaching sensitive receptors. A search of the Department's Incidents and Complaints Management System (ICMS) indicates that no noise complaints have been received for the Premises. Hours of operation are also restricted with processing activities not occurring before 7am. The Licence Holder advised that the measured sound levels from the recycling operation at the nearest industrial enterprise located to the South of the Premises was recorded at LA10 64 dB, which complies with the assigned industrial noise level under the Noise Regulations.	Condition 14: Waste processing specification Condition 16: Infrastructure and equipment. Noise emissions are also subject to the provisions of the Noise Regulations.

Risk Event				Consequence rating	Likelihood rating	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Licence Holder controls					
Crushing and screening operations Sand-screening activities Dust lift off from stockpiles Vehicle/heavy machinery movements	Dust (excluding asbestos fibres)	Air/windborne pathway causing impacts to health and amenity of closest human receptors being the residential premises located approximately 450 metres North-East of the Premises, which may be experienced particularly under a southerly wind direction. Nuisance, health and amenity impacts may also be experienced by commercial and industrial receptors located immediately adjacent to the Premises boundary.	As outlined in Section 7.4.	Moderate	Possible	Medium	The neighbouring industrial enterprises and closest residential Premises located 450 metres from the Premises may be impacted by dust emissions as a result of the operation. However, noting the Licence Holder's control measures that are currently in place as discussed under Section 7.4, dust emissions as a result of operation activities are not likely to result in a significant impact to the these receptors. A search of the Department's Incidents and Complaints Management System (ICMS) indicates that no dust complaints have been received for the Premises. The Licence Holder is also required to undertake independent air-quality monitoring requirements periodically for dust emissions that have been imposed by the City of Bayswater at six boundary locations around the Premises. The Licence Holder advised that survey results indicate that exposure levels to the standards listed under Regulation 3.37 Section (b) of the <i>Occupational Safety and Health Regulations 1996</i> limit of 10 mg/m³ over an 8-hour day are low.	Condition 14: Waste processing specification Condition 16: Infrastructure and equipment Condition 17: Wheel wash requirements for vehicles existing onto public roads Conditions 20 and 21: Dust emission controls

Risk Event				Consequence rating	Likelihood rating	Risk ¹	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors, pathway and impact	Licence Holder controls					
Crushing and processing operations Lift-off for asbestos fibres from product stockpiles potentially contaminated with asbestos. Final recycled product to be supplied to third-parties.	Asbestos fibres	Asbestos fibres from incoming non-conforming waste types may become airborne when processed and can be transported by prevailing winds impacting on the health of neighbouring enterprises and residences (located 450 north of Premises). Asbestos fibres may also result in potential health impacts to final end users of products being sold from the facility if asbestos fibres are present.	As outlined in Section 7.4	Severe	Rare	High	The facility operates in accordance with an Asbestos Management Plan. Asbestos fibres have not been detected at the site during product testing, at any of the surveyed locations that are regularly monitored, or during the air-quality monitoring programmes. The Licence Holder notes that levels recorded during air-quality monitoring were all below the equivalent adopted exposure standard of <0.1 fibres/ML and the Adopted National Exposure Standards for Atmospheric Contaminants in the Occupational Environment [NOHSC: 1003 (1995)] (asbestos). Stockpiles of waste, product tested for asbestos, and products awaiting testing for asbestos, will be maintained in three stockpiles clearly separated and signposted to avoid potential for cross contamination. Although the risk rating for asbestos emissions is high, this risk is managed to acceptable levels through the inclusion of multiple regulatory controls.	Conditions 1 – 7: Waste acceptance Conditions 8 – 13: Unloading inspection Condition 14: Waste processing specification Condition 16: Infrastructure and equipment Conditions 18 and 19: Stockpile Management Conditions 20 and 21: Dust emission controls Conditions 24 – 27: Product testing and supply

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)

8. Consultation

Table 10: Summary of consultation

Method	Comments received	DWER response
Application advertised on DWER website (18/09/2019)	None received	N/A
Draft decision report and licence renewal provided to Licence Holder (14/10/2019), comments received 11/11/19 and 21/11/19.	<u>Updated Prescribed Premises GPS coordinates</u> The Licence Holder provided the final GPS coordinates and updated Site Layout Plan for the revised Prescribed Premises boundary.	Upon verifying the final GPS coordinates provided, it was noted that GPS coordinate 1 specified in the Site Layout Plan is outside of the cadastral boundary. The GPS coordinates were determined by DWER's GIS mapping system. The GPS coordinate table in the Licence has therefore been updated to reflect the cadastral boundary points other than the modified eastern portion of the Premises. Figure 1 'Site Layout Plan' and 'Figure 2 'Premises siting – distance to receptors' of the Decision Report has also been updated to reflect the change.
	<u>Licence: Condition 16 - Infrastructure and equipment</u> The Licence Holder requested that Rows 2 and 3 of Table 4 in the Licence that make reference to a drainage sump and concrete holding tank be removed from the licence as this infrastructure was part of the ASS treatment area which is no longer within the Prescribed Premises boundary.	Condition 16 has been amended to exclude any reference to the drainage sump and concrete holding tank infrastructure which is no longer relevant to the activities at the Premises.
	<u>Licence: Condition 16 - Infrastructure and equipment</u> The Licence Holder requested that the wording of the operational requirements for the water cart equipment in Row 4 of Table 4 of the Licence advising that waste stockpiles must remain in a damp state to prevent dust lift-off be amended as it is not practical to achieve when the facility is not in operation.	Condition 16 has been amended to state that targeted wetting must occur during operational hours to ensure Product and Waste stockpiles and unsealed access roads are kept in a damp state to prevent dust lift off.
	<u>Licence: Condition 16 - Infrastructure and equipment</u> The Licence Holder provided the location of the wheel wash system on an updated Site Layout Plan to be installed within the Prescribed Premises.	Installing a wheel wash in the proposed location at the Premises is not considered to be practicable given vehicles will be exiting the Premises using unsealed roads on the adjacent Lot (60 Clune Street) prior to existing onto public roads. Whilst the adjoining Lot is subject to a different licence (L7932/2004/4), the site is also occupied

		by the Licence Holder (Resource Recovery Solutions Pty Ltd). Given this, an outcome-based condition (condition 17) has been placed on the Licence that requires all vehicles to pass over a wheel wash system to ensure vehicles are sufficiently free of dirt, mud and/or sediment prior to entering public roads. Condition 16 has been amended to remove the operational requirement of installing and using a wheelwash system on the Premises. The wheelwash system has been removed from the Site Layout Plan and Table 5 of the Decision Report accordingly.
	<u>Licence: Conditions 22 and 23 - Monitoring</u> The Licence Holder has advised that a weighbridge is not installed at the Premises. Therefore, the Licence Holder has requested that waste accepted at the Premises is reported in cubic metres instead of tonnes, and waste removed from the Premises is reported in tonnes (as outgoing materials are loaded with a front-end loader fitted with a Loadrite weighing device).	All units of waste accepted and removed from the Premises must be reported in tonnes. However, noting there is no weighbridge present at the Premises, condition 22 has been amended to state that waste received at the Premises can be recorded in cubic metres. A conversion factor of 1.3 tonnes in every m³ must be used to calculate tonnage for reporting purposes. The 1.3 conversion has been adopted as the approximate bulk density and is based on the waste types authorised to be received at the Premises. Condition 23 has been amended to state that non-conforming wastes removed at the Premises are recorded in cubic metres, however must be converted to tonnage for reporting purposes. The weighbridge noted in Table 5 of the Decision Report has been removed to reflect this change.
	<u>Licence: Conditions 30 and 31 - Reporting</u> The Licence Holder has requested that annual reporting be provided on 31 January each year for the preceding annual period.	Conditions 30 and 31 within the Licence have been modified accordingly.
	<u>Decision Report: Section 5 - Overview of existing Premises</u> The Licence Holder advised that there will be no Category 61A activities occurring outside the Prescribed Premises boundary and that the area of the revised Prescribed Premises boundary is 9500m².	This additional information has been included in Section 5 of the Decision Report.
	<u>Decision Report: Section 5.1 – Operational aspect</u>	This additional information has been included in Section 5.1 of the Decision Report.

	The Licence Holder confirmed that all incoming loads are visually inspected by an employee that is trained in identifying asbestos and clarified that hazardous materials refers to asbestos containing material.	
	<u>Decision Report: Section 5.2 – Infrastructure</u> The Licence Holder advised of the sound power levels of the crusher and screener located at the Premises.	This additional information has been included in Section 5.2 of the Decision Report.
	<u>Decision Report: Section 6.2 – Other Relevant Approvals (Planning Approval)</u> The Licence Holder advised that the approved fence placement adjoining Collier Road was constructed within the timeframes of the Planning Approval, and that there is no expiry date of the approval for the C&D processing operations at the Premises.	Table 6 of the Decision Report has been updated to reflect this additional information.
	<u>Decision Report: Section 7.4: Licence Holder Controls</u> The Licence Holder requested that the proposed control for dust in Table 8 that refers to stockpiles being limited to seven metres in height and kept below the boundary fenceline needs to be amended as there is no fenceline installed on the south side of the Premises. The Licence Holder also advised that the fenceline for the eastern side of the Premises will be constructed prior to December 2019.	Further clarification has been provided in Table 8 of the Decision Report in relation to the perimeter fencing of the Premises and the reference to keeping stockpiles below the fence line has been removed.
	<u>Decision Report: Section 7.4: Licence Holder Controls</u> The Licence Holder provided clarification on what the asbestos kit entails and confirmation that air quality monitoring testing for ACM occurs bimonthly (every two months).	This additional information has been included in Table 8 of the Decision Report.

9. Conclusion

Based on the assessment in this decision report, the Delegated Officer has determined that the application to renew licence L8397/2009/3 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

MANAGER WASTE INDUSTRIES REGULATORY SERVICES

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

Appendix 1: Key documents

Document title	Availability
Licence (L8397/2009/3) application form and supporting documentation (August 2019)	DWER records (A1819094)
DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at www.dwer.wa.gov.au
DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
DER, February 2017 <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
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