



Application for Licence Amendment

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

Licence Number	L8477/2010/2
Licence Holder	SUEZ Recycling and Recovery Pty Ltd
ACN	70 002 902 650
File Number	2010/007005-1~3
Premises	<p>SUEZ Landsdale Resource Recovery Park</p> <p>15 Atwell Street</p> <p>LANDSDALE WA 6065</p> <p>Legal description –</p> <p>Lot 79 on Diagram 57260</p> <p>As defined by the Premises maps attached to the Revised Licence</p>
Date of Report	03 June 2021
Decision	Revised licence granted

**MANAGER WASTE INDUSTRIES
REGULATORY SERVICES**

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

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1. Decision summary

Licence L8477/2010/2 is held by SUEZ Recycling and Recovery Pty Ltd (Licence Holder) for the SUEZ Landsdale Resource Recovery Park (the Premises), located at 15 Attwell Street in Landsdale.

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 L8477/2010/2 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

2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Application summary

On 30 October 2020, the Licence Holder submitted an application to the department to amend Licence L8477/2010/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Capturing existing activities for processing paper, newspaper and cardboard at the Premises, by way of specifying the activities in the Licence and increasing the licensed throughput to account for the activities.

The application follows a DWER inspection in May 2020.

2.3 Licence history

Date	Reference number	Summary of changes
15/10/2015	L8477/2010/2	Licence granted
13/10/2016	L8477/2010/2	Amendment Notice 1 Change of registered business name
21/02/2017	L8477/2010/2	Amendment Notice 2 Increase in Category 62 throughput and acceptance of green waste
21/08/2020	L8477/2010/2	Amendment for the removal of Category 13, an increase in Category 62 throughput and a change in Premises name. Consolidation of previous Amendment Notices into Licence.
01/06/2021	L8477/2010/1	Amendment to capture paper and cardboard recycling activities onto the licence.

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 operation which have been considered in this Amendment Report are detailed in Table 1 below. Table 1 also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Figure 1 depicts the general layout of infrastructure and activity areas at the premises. The layout of fire related management systems and drainage /stormwater systems are shown in Appendix 1 (Figures 3-5).



Figure 1: Indicative layout of paper and cardboard activity areas

Table 1: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Noise	Vehicle and machinery usage to handle and store materials	Air/windborne pathway	<p>No additional controls proposed. The current practices as summarized in the application:</p> <ul style="list-style-type: none"> As defined by the <i>Environmental Protection (Noise) Regulations 1997</i>, the facility operates between 5.00 am and 5.00 pm weekdays and between 5.00 am and 1.00 pm on Saturdays; consequently, there are two hours in the morning where activities occur during the restricted noise period. This situation has been ongoing for many years, with the licence holder reporting no noise related complaints being received from neighbouring sites. The vast majority of the paper and cardboard sorting and baling activities occur within the recycling building. Operation is undertaken within the fully enclosed recycling building. Monitoring – potential noise emissions are monitored on a continuous basis by operations staff. Contingency plans – Increased maintenance of the balers.
Windblown waste (litter)	Paper, newspaper and cardboard handling and storage	Air/windborne pathway	<ul style="list-style-type: none"> The facility design incorporates a litter net at the material load-out area and raised edges on the floors at all roller doors to effectively trap the majority of the litter and retain it within the building. All paper and cardboard handling activities occur within the recycling building, with only baled material being handled externally. Regular cleanup of litter within the building. Active litter collection on site and in the neighbouring streets to prevent litter build-up beyond the facility. Perimeter fencing/walls around the property. Monitoring – litter emissions will be monitored on a continuous basis by operations staff. Contingency plans – additional litter collection in adverse weather conditions and

Emission	Sources	Potential pathways	Proposed controls
			operating with some or all roller doors closed.
Fire related emissions			<p>The application states that the incoming recycling paper and cardboard waste materials will be processed to maintain a reasonable level of waste, being a maximum of 350 tonnes at any one time. The application also describes:</p> <ul style="list-style-type: none"> • Fire detectors within the recycling shed, which are integrated into on-site 24/7 external monitoring system. • Regular maintenance of processing equipment, including the removal of any paper fibre that may accumulate within the equipment workings. • Regular cleanup of litter within the recycling building, in particular around processing equipment. • Minimising the storage and removal of baled materials as soon as possible. • During operating hours site operations staff will immediately act to extinguish any fires. • Fire training of operational staff. • There are fire hose reels within the recycling building. • There is a fire hydrant on-site. • After hours, the facility fire alarm will call out the local fire brigade. • Operational documentation that covers on-site fire management. <p>Applicant submitted an Emergency Response plan with the Application and an Environmental Management Plan. The plans include:</p> <ul style="list-style-type: none"> • Loose waste is stored apart from baled materials • There is fire detection in the shed • Bales are loaded out into containers to keep stock on site to a maximum of 350 tonnes at any one time. • Never use a bale of combustible material to clean floors.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> • Flammable baled materials are stacked in a pyramid style (to reduce the spread of fire should there be an incident). • Baled materials are only stored in the recycling shed to a maximum of 350 tonnes at any one time before loaded out into containers. Each area of the site is covered by the Emergency Response Plan with key details. • Fire clean up of water resulting from a fire event on site would either be contained to the leachate collection system or within the storm water sumps. The leachate collection system can be emptied as required and taken to a licence facility. The storm water drains could also be blocked or pumped out in the event of a fire event. • Monitoring & maintenance requirements. • The fire systems are tested regularly to ensure compliance to relevant Australian Standards (e.g. AS1851 and AS2293.2). All testing is completed by a specialist provider with records of testing and tagging maintained and available on site. • Emergency response exercises are completed regularly to train workers and test emergency plans. • Site checklist, inspections and audits ensure that the site is conforming to required housekeeping, stockpiles, and storage to maintain a low fire risk.
Odour	Paper, newspaper and cardboard handling and storage	Air/windborne pathway	No additional controls proposed.

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'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 2 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)).

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

Human receptors	Distance from prescribed activity
Commercial Premises	Immediately adjacent to Premises
Residential Premises	550 m south of Premises 922 m east of Premises
Environmental receptors	Distance from prescribed activity
Bushforever site 463	700 m north east of Premises
Public drinking water source area – Gnangara underground water pollution control area	1830 m east of Premises
Underlying groundwater - 11.3 metres below ground level	Mapped within Premises area

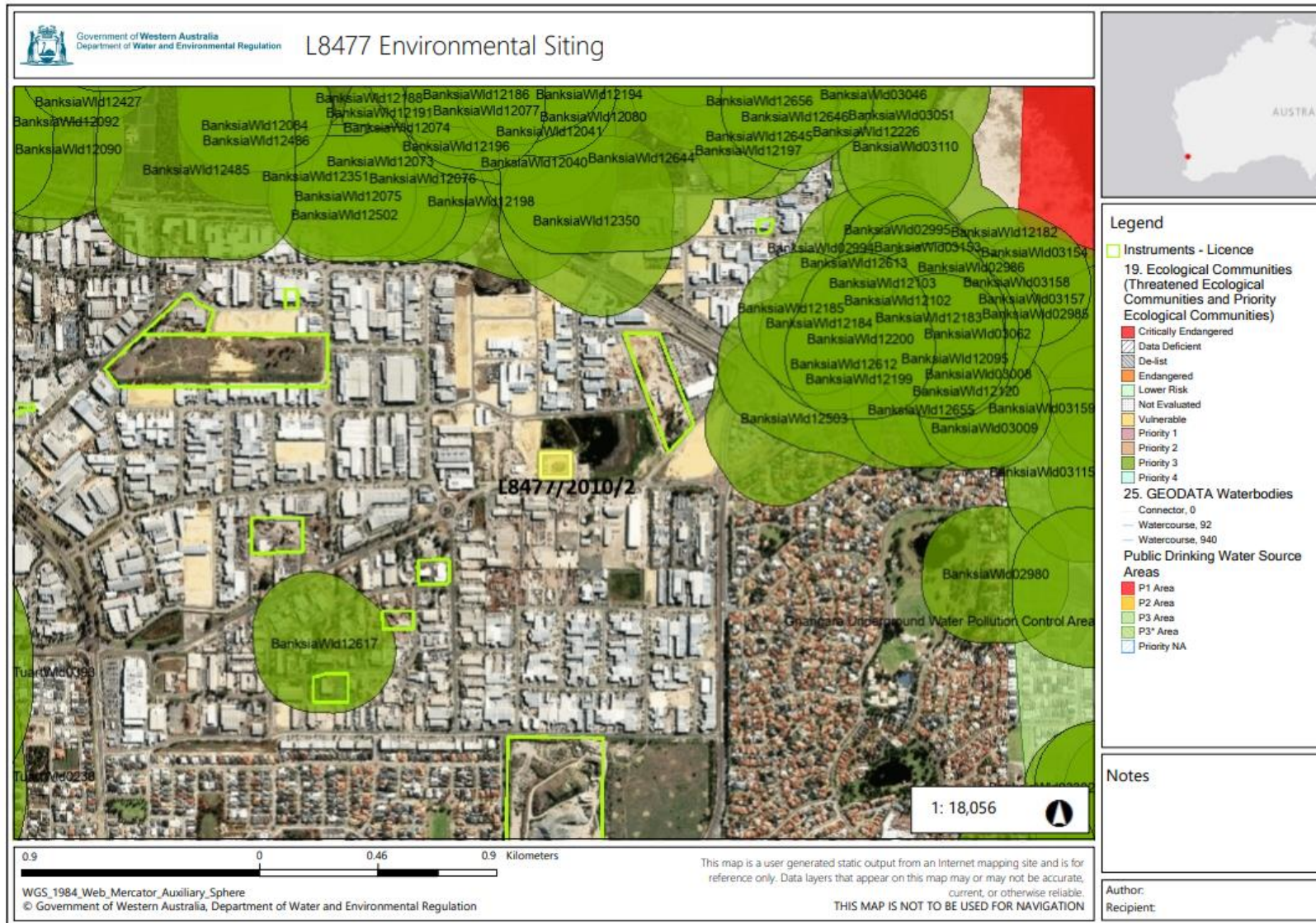


Figure 2: Environmental Siting

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IR-T15 Amendment Report Template v2.0 (July 2020)

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 3.

The Revised Licence L8477/2010/2 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises i.e. paper, newspaper and cardboard handling activities.

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

Table 3. Risk assessment of potential emissions and discharges from the Premises 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								
Acceptance, handling and storage of waste	Noise	Air/windborne pathway causing impacts to health and amenity	Commercial Premises immediately adjacent to the Premises.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	<i>Environmental (Noise) Protection Regulations 1997</i> apply.	N/A
	Odour		Residential Premises 550 m south and 922 m east of the Premises.		C = Moderate L = Unlikely Medium Risk	Y	Condition 7	N/A
	Windblown waste	Air/windborne pathway causing impacts to amenity	Commercial Premises immediately adjacent to the Premises.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Condition 4	N/A
	Fire related emissions – liquid runoff from fire washwater, contaminated stormwater (in the event of a fire incident)	Overland runoff and potential ingress to stormwater system. Potential impacts to underlying groundwater via direct seepage to ground, or via the stormwater system.	Commercial Premises immediately adjacent to the Premises Residential Premises 550 m south and 922 m east of the Premises. Underlying groundwater - 11.3 metres below ground level.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition 7, 11, 12, 15	The potential fire size correlates with the stockpile and site layout. Implementation of appropriate fire response procedures and firefighting equipment are important controls to reduce the impact of any fires which may occur. Conditions largely reflect licence holder controls Additional detail to limit the storage volumes on site. Addition of plans to assist firefighting efforts in the event of a fire.

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Risk Event					Risk rating ¹	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	C = consequence L = likelihood			
								Notification requirement
	Fire related emissions – smoke and embers	Air/windborne pathway causing impacts to health and amenity	Commercial Premises immediately adjacent to the Premises. Residential Premises 550 m south and 922 m east of the Premises.	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition <u>7</u> , <u>11</u> , <u>12</u> , <u>15</u>	The potential fire size correlates with the stockpile and site layout. Implementation of appropriate fire response procedures and firefighting equipment are important controls to reduce the impact of any fires which may occur. Conditions largely reflect licence holder controls Additional detail to limit the storage volumes on site. Addition of plans to assist firefighting efforts in the event of a fire. Notification requirements for fire incidents.

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.

4. Consultation

Table 4 provides a summary of the consultation undertaken by the department. This is expanded in Appendix

Table 4: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (18 December 2020)	The City of Wanneroo confirmed that no additional planning approvals are required for the activities described in the application. The City of Wanneroo noted they consider windblown waste and odour to warrant management. They handled complaints about the premises about windblown litter (2019), waste attracting birds (2018) and odour (2018).	The Delegated Officer notes that windblown waste conditions were changed in the prior amendment following complaints (see Table 5) and that odour and windblown waste are relevant to this Premises and addressed in existing licence conditions.
Licence Holder was provided with draft amendment on 18 December 2020	Licence holder replied on 4 May 2021 and 31 May 2021 to confirm the maximum storage limit for paper and cardboard and provide maps.	Noted and included in the final licence and amendment report.

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

Table 5: Summary of licence amendments

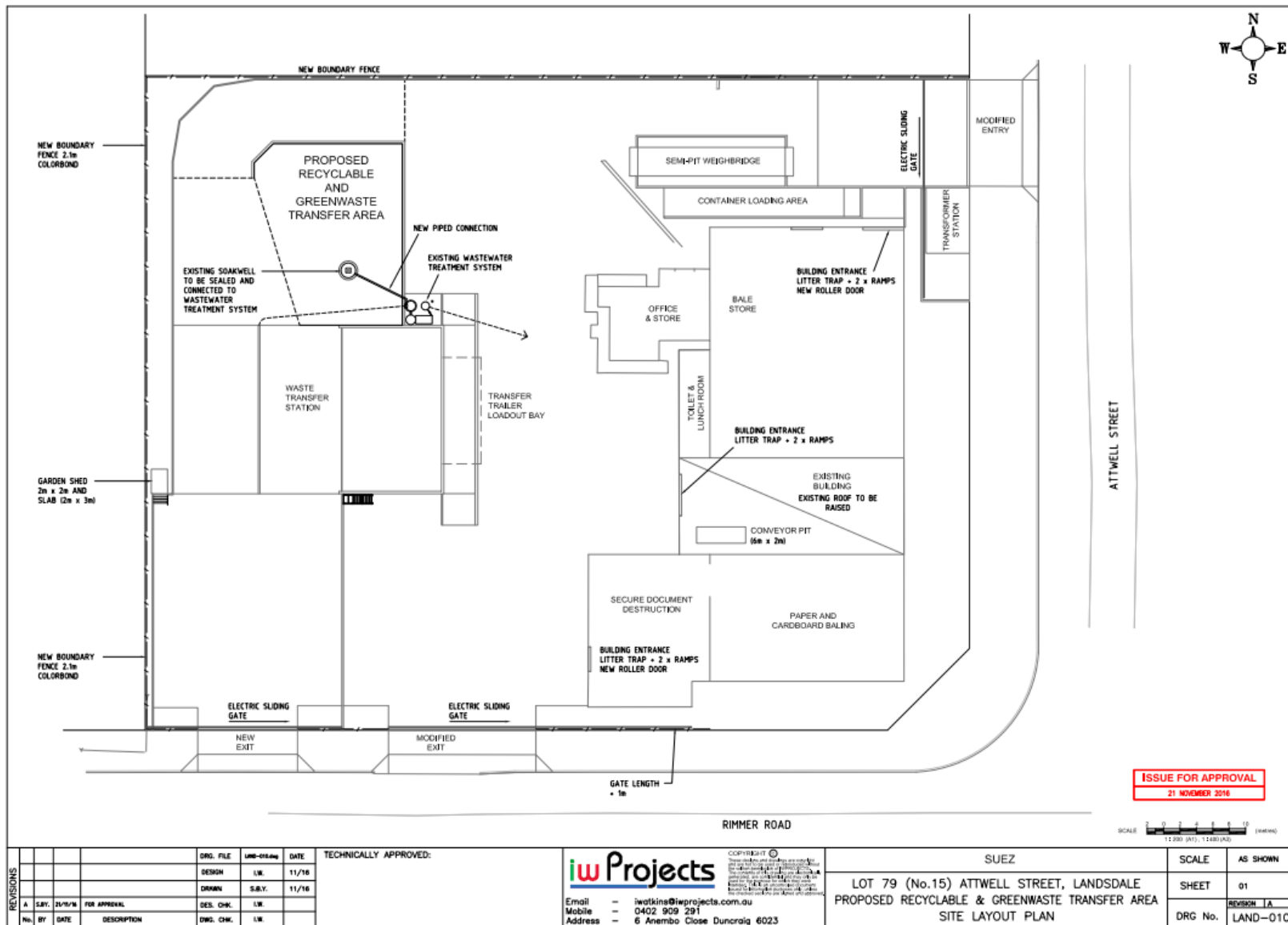
Condition no.	Proposed amendments
General	Change assessment design capacity on front page of licence.
Licence history	Add current amendment details into table.
5, Table 1	Add paper, newspaper and cardboard to the waste acceptance table.
7, Table 2	Add paper, newspaper and cardboard to the waste processing table.
11 to 12	Add fire risk management conditions
15, Table 3	Add paper, newspaper and cardboard to the monitoring table.
16 to 21	Renumbered in this licence because further conditions were added.

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.

Appendix 1: Maps relating to fire-related emission risk assessment

The layout of fire related management systems and drainage /stormwater systems are shown below. High resolution copies for use in fire-related emission management are retained by the Licence Holder.



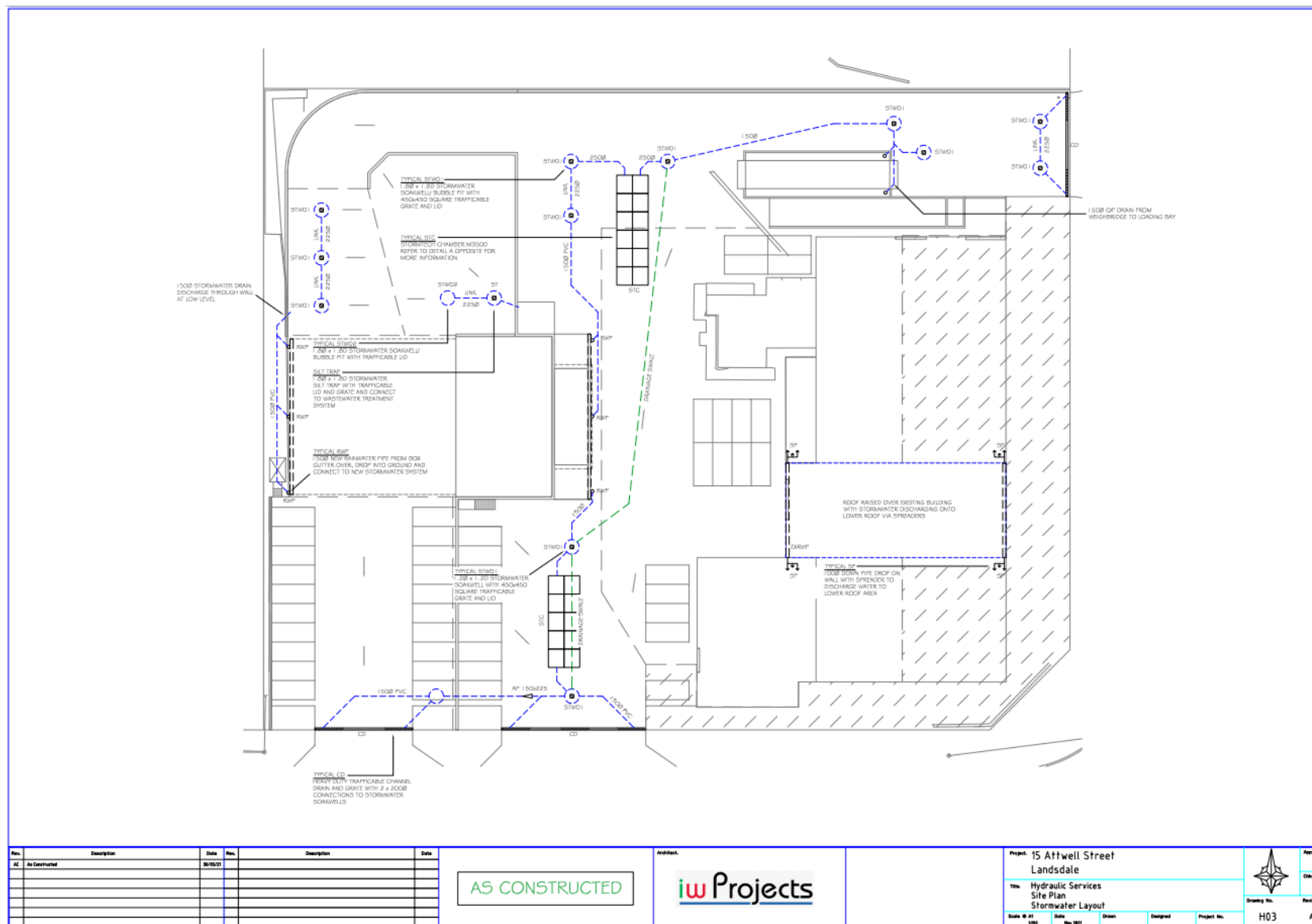


Figure 5: Site plan - stormwater layout

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Appendix 2: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
7, Table 2	Proposed maximum of 350 tonnes of paper and cardboard to be stored and any one time	Noted. Table 2 updated to specify the maximum storage amount.
11	Provided plans as outlined for conditions 11	Noted. Included in Amendment Report

Appendix 3: Application validation summary

SECTION 1: APPLICATION SUMMARY (as updated from validation checklist)					
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:	L8477/2010/2		
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received		30 October 2020			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Suez Recycling & Recovery Pty Ltd			
Premises name		Suez Landsdale Resource Recovery Park			
Premises location		15 Attwell Street LANDSDALE WA 6065 Lot 79 of Diagram 57260			
Local Government Authority		City of Wanneroo			
Application documents					
HPCM file reference number:		2010/007005-1~3			
Key application documents (additional to application form):		Cardboard Application Supporting Documentation Appendix No. 2 – Environmental Management Plan Appendix No. 3 – Emergency Response Plan			
Scope of application/assessment					
Summary of proposed activities or changes to existing operations.		Inclusion of existing paper and cardboard sorting and baling activities in Category 62. Associated increase in site throughput to 165,500 tpa (from 125,000 tpa).			

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 62: Solid waste depot	125,000 tpa	165,500 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 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 type="checkbox"/> No <input checked="" type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	Current planning approval reviewed in August 2020 amendment.
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"/>	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"/>	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"/>	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 type="checkbox"/>	Name: N/A

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: 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</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"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A Date of classification: N/A