



Application for Licence Amendment

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

Licence Number	L8755/2013/1
Licence Holder	Veolia Environmental Services (Australia) Pty Ltd
ACN	051 316 584
File Number	2013/000940-1~2
Premises	Veolia Transfer Station Meru Landfill Lane, Narngulu, WA, 6532 Legal description - Lot 132/133 on Diagram 91074 As defined by the coordinates in Schedule 2 of the Revised Licence As defined by the Premises maps attached to the Revised Licence
Date of Report	21 December 2023
Decision	Revised licence granted

**SENIOR INDUSTRY REGULATION OFFICER
REGULATORY SERVICES**

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

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1. Decision summary

Licence L8755/2013/1 is held by Veolia Environmental Services (Australia) Pty Ltd (Licence Holder) for the Veolia Transfer Station Meru (the Premises), located at Landfill Lane, Narngulu.

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 L8755/2013/1 has been granted.

The Revised Licence/Works Approval issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Amendment summary

On 13 May 2023, the Licence Holder submitted an application to the department to amend Licence L8755/2013/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

Veolia Waste Transfer Station Meru is currently licensed to facilitate the receipt and separation of liquid waste (waste oil/water) with an existing licence (L8755/2013/1) allowing 1,400 tonnes of Category 61 waste annually.

An amendment is being proposed for the addition of a new category, Category 62: Solid waste depot. This new category will allow the site to receive and store up to 25,000 tonnes per year of Special Waste Type 2, which includes controlled waste codes for Clinical and Pharmaceutical waste stream R100, R120, R130, and R140, as specified in the [Controlled Waste Category List](#).

The waste will be received on-site in 120L or 240L mobile garbage bins and stored securely in refrigerated containers before being transferred to an approved off-site medical waste facility for processing. Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed design changes

Category	Current design capacity	Proposed design capacity
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewage waste) is stored, reprocessed, treated or irrigated	1,400 tonnes per year	No change
Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use	N/A	25,000 tonnes per year

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.

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 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
Noise	Vehicle movements associated with loading/unloading	Air/windborne pathway	Site only operates between “day-time” hours (7am to 3pm, Mon – Fri)
Dust			
Leachate	Loading/unloading of Special type waste 2 Storage of Special type waste 2	Seepage to soils and groundwater	Compacted soil (red loam, clays) hardstand Bunded spill mat deployed over the ground for loading/unloading Spill kits provided in each delivery truck and on-site Waste handled within bunded area where possible Waste accepted and stored within locked, leakproof, refrigerated containers where access is restricted to authorized personnel only No more than 15 tonnes of solid and liquid wastes to be stored on site at any one time

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 prescribed activity
Closest residential receptor	640 meters north-east from the boundary of the premises
Commercial properties	Immediately adjacent
Groundwater user/ bore	765 m to the west of the premises boundary
Environmental receptors	Distance from prescribed activity
Underlying groundwater aquifers	Arrowsmith unconfined Perth – Superficial Swan
RIWI Surface water areas and irrigation district	Greenough River and Tributaries catchment area 20 m South west of the boundary of the premises
Underlying groundwater (non-potable purposes)	Data from groundwater monitoring bores within L9127/2018/1 immediately west of the premises indicate that depth to groundwater is between 14.6 to 17.5 mBGL.

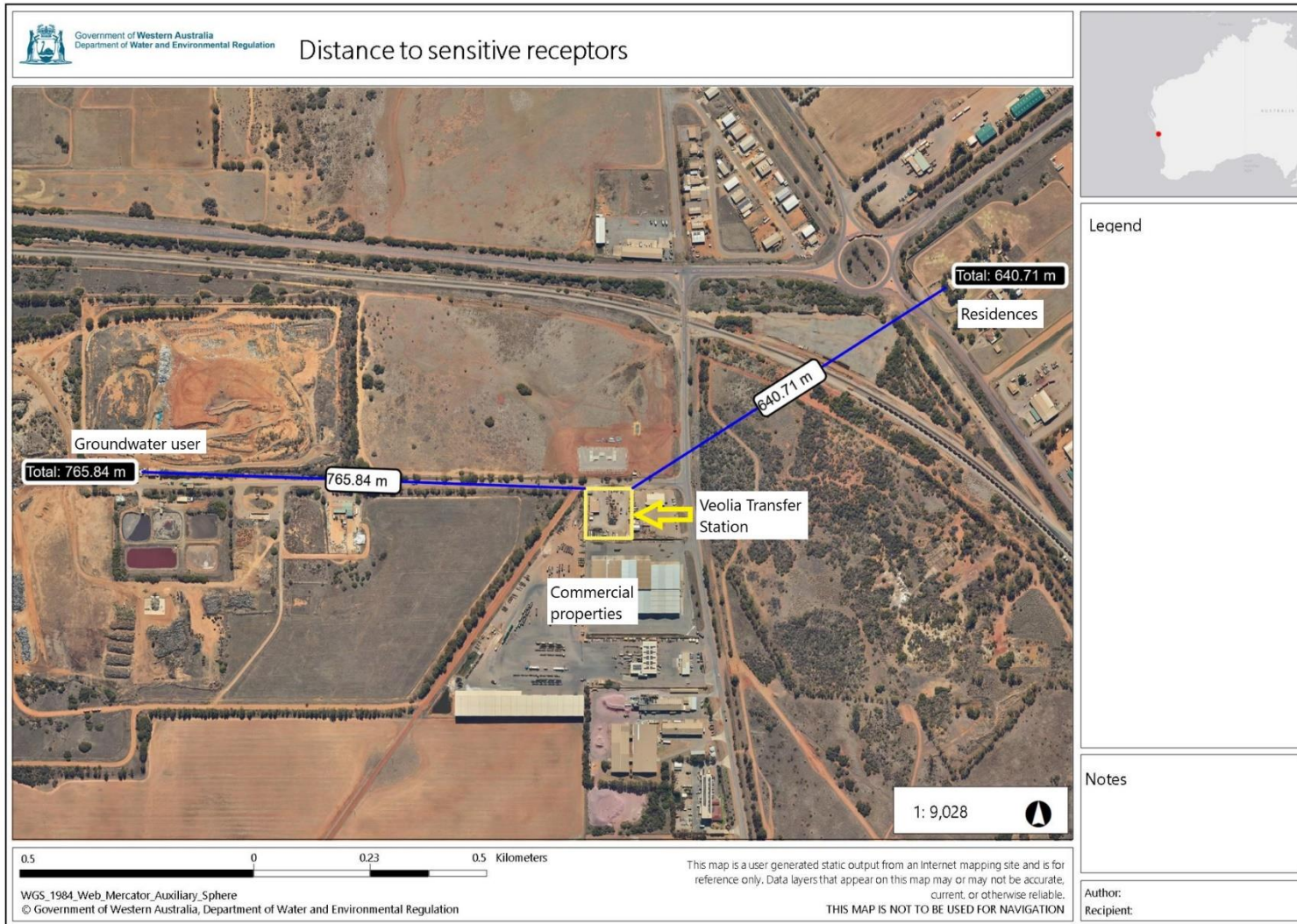


Figure 1: Distance to sensitive receptors

Licence: L8755/2013/1

IR-T15 Amendment report template v3.0 (May 2021)

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 L8755/2013/1 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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 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								
Unloading, loading and storage of material Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity	Residences (closest 640m north-east)	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 4	N/A
	Noise		Commercial properties (immediately adjacent)		C = Minor L = Rare Low Risk	Y	Condition 4	N/A
	Leachate	Localised contamination of soils causing infiltration into groundwater	Underlying groundwater	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Conditions 1, 5, 8 and 9 <u>Conditions 10-13</u>	Additional controls necessary to mitigate the risk of potential leachate emissions to underlying groundwater from hazardous materials storage, contaminated stormwater and washbay area operations.

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
Application advertised on the department's website (6 November 2023)	None received	N/A
Local Government Authority advised of proposal 7 November 2023	None received	N/A
Department of Health (DOH), advised of proposal 7 November 2023	<p>DOH replied on 20 November 2023 with the following comments:</p> <ul style="list-style-type: none"> The documentation does not indicate how long the refrigerated clinical waste will remain on site, prior to further processing. Contingency plan required for power supply interruption to refrigerators. Consideration of additional or redundant strategies to minimise release of unpleasant odours that could enter the lunchroom are highly recommended 	<p>The department has considered the information provided and notes:</p> <ul style="list-style-type: none"> Condition 8 of the licence ensures clinical and pharmaceutical wastes are be removed from the premises with 14 days of receipt. Advice from DOH regarding contingency plans for power interruptions and odour management has been provided to the applicant in this decision report and has been taken into consideration in the licence.
Licence holder was provided with draft amendment on 19 December 2023	The licence holder responded on 20 December 2023 requesting to remove Condition 22 – AER and waive the remainder of the comment period.	The department agrees and Condition 22 – AER has been removed as per <i>Notice of amendment of licence reporting requirements section 59(2), section 59(1)(a) and 59(1)(b) Environmental Protection Act 1986 licensed prescribed premises (DWER 2022)</i> .

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 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	Updated to current licencing format
N/A	Addition of Category 62: Solid waste depot with assessed design capacity for 25,000 tonnes per year
1	Inclusion of infrastructure and equipment requirements
3 (Table 2)	Inclusion of waste types including codes authorised to be accepted on premises
4	Inclusion of acceptance and operational hours
5 and 6	Inclusion of waste acceptance criteria and records
8 (Table 3)	Inclusion of waste processing and storage for Special Waste Type 2 Inclusion of solid and liquid waste limit of 15 tonnes to be stored at any one time on the premises Inclusion of Special Waste Type 2 to not include waste with the potential for putrefaction and not include liquid waste outside of incidental expected amounts and to be stored at 7 degrees Celsius or less.
10	Inclusion of hazardous material storage requirements prior to removal
11 and 12	Inclusion of stormwater management
13	Inclusion of washbay area waste management
22 (Table 5)	Annual Environment Report requirement has been removed as per <i>Notice of amendment of licence reporting requirements section 59(2), section 59(1)(a) and 59(1)(b) Environmental Protection Act 1986 licensed prescribed premises (DWER 2022)</i> .

Table 7: Consolidation of licence conditions in this amendment

Existing condition	Condition summary	Revised licence condition	Conversion notes
N/A	Expiry Date: 14 July 2018	Expiry Date: 14 July 2033	In accordance with the Notice of Amendment of Licence Expiry Dates (29/04/2016)
N/A	Prescribed Premises Category table	N/A	Revised to current licensing format.
1.1.1 1.1.2	Interpretation and definitions	Interpretation section and Definitions	Redundant condition. Revised to current licensing format.
1.1.3	Australian or other standard	Interpretation section, Definitions	Redundant condition. Revised to current licensing format.
1.2.1	Emissions	N/A	Redundant condition. Deleted from licence.

Existing condition	Condition summary	Revised licence condition	Conversion notes
1.2.2	Pollution control and monitoring equipment	N/A	Redundant condition. Adequately covered by alternative existing conditions. Deleted from licence.
1.2.3	Storage of environmentally hazardous materials	N/A	Redundant condition. Adequately regulated by the Dangerous Goods Safety Act 2004. Deleted from licence.
1.2.4	Recovery and removal of spills	N/A	Redundant condition. Adequately covered by EP (Unauthorised Discharges) Regulations 2004. Deleted from licence.
1.2.5	Prevention of contamination and containment of contaminated stormwater	N/A	Redundant condition. Adequately covered by alternative existing conditions and proposed new conditions. Deleted from licence.
1.3.1 Table 1.3.1	Waste acceptance	Condition 3 Table 2	Revised to current licensing format.
1.3.2	Waste acceptance	Condition 7	New numbering.
1.3.3 Table 1.3.2	Waste processing	Condition 8 Table 3	Revised to current licensing format.
1.3.4	Security measures	Condition 2	Revised to current licensing format and new wording.
1.3.5	Infestation prevention	N/A	Redundant condition. Deleted from licence.
1.3.6 1.3.7	Windblown litter	Condition 16	Revised to current licensing format and new wording.
1.3.8	Burning of waste	Condition 14	New numbering
1.3.9	Notifying department	Condition 15	Revised to current licensing format.
1.3.10	Waste oil collection area infrastructure	Condition 1	Revised to current licensing format.
1.3.11	Waste oil collection area infrastructure	Condition 1	Revised to current licensing format.
1.3.12	Wastewater separation	N/A	Redundant condition. Deleted from licence.
2.11 - 2.8.1	Emissions	N/A	Redundant conditions. Deleted from licence. Adequately covered by s.49 of the EP Act 1986 and proposed new conditions.
3.1.1 – 3.5	Monitoring	N/A	Redundant conditions. Deleted from licence.

Existing condition	Condition summary	Revised licence condition	Conversion notes
3.7 – 3.9			
3.6.1	Monitoring	Condition 17	Revised to current licensing format.
4.1	Improvement Programme	N/A	Redundant condition. Deleted from licence.
5.1.1 – 5.1.5	Records	Conditions 18 - 20	New numbering and update to wording format
5.2.1 Table 5.2.1	Reporting	Condition 21 Table 5	New numbering and revised to current licensing format
5.3.1	Notification	N/A	Redundant condition. Deleted from licence.
Schedule 2 Reporting & notifications	Annual Audit Compliance Report Form N1 Notification	N/A	Redundant attachment. Deleted from Licence. While the N1 form has been removed from the licence, the Licence Holder should ensure that appropriate notification is provided to the department.

6. 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. Department of Water and Environmental Regulation (DWER) 2022, *Notice of amendment of licence reporting requirements section 59(2), section 59(1)(a) and 59(1)(b) Environmental Protection Act 1986 licensed prescribed premises*, Perth, Western Australia
4. 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:	L8755/2013/1		
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received	13/06/2023				
Applicant and Premises details					
Applicant name/s (full legal name/s)	Veolia Environmental Services (Australia) Pty Ltd				
Premises name	Veolia Waste Transfer Station Meru				
Premises location	Lot 132 and 133 on Plan 91074 Landfill Lane, NARNGULA, WA 6532				
Local Government Authority	City of Greater Geraldton				
Application documents					
HPCM file reference number:	DWERDT798667				
Key application documents (additional to application form):	Supporting documentation, Plan and Premises Boundary				
Scope of application/assessment					
Summary of proposed activities or changes to existing operations.	Licence Amendment The site currently operates as a waste transfer station under <ul style="list-style-type: none"> Category 61- receipt and separation of liquid waste (oil and water) (A) <ul style="list-style-type: none"> NEW Category 62 Solid Waste Depot – receipt and storage of Special waste type 2 including waste codes R1000, R120, R130 and R140 				

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
Category 61: Liquid waste facility	Assessed – 1,400 tonnes per annum	No change
Category 62: Solid waste depot	Not assessed	Proposed – 25,000 tonnes per annum

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date: If N/A explain why?
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.

<p>Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Name: N/A Type: Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Regional office:</p>
<p>Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>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"/></p>
<p>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>)</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>N/A</p>
<p>Is the Premises within an Environmental Protection Policy (EPP) Area?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>N/A</p>
<p>Is the Premises subject to any EPP requirements?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>N/A</p>
<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</p>