



## ***Environmental Protection Act 1986, Part V***

**Licence: L8827/2014/1**

**Expiry date:** Wednesday, 25 November 2020

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 and that the licence and its conditions will ensure that an appropriate level of environmental protection is provided.

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"/><br>New Licence <input checked="" type="checkbox"/><br>Licence amendment <input type="checkbox"/><br>Works Approval amendment <input type="checkbox"/> |   |
| Activities that cause the premises to become prescribed premises  | <b>Category number(s)</b>   | <b>Assessed design capacity</b>   |
|   | 62  | 15,500 tonnes per annual period   |
|   |   |   |
|   |   |   |
| Application verified  | Date: 17/06/2014  |   |
| Application fee paid  | Date: 29/07/2014  |   |
| 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  |   |   |
| 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:<br>Managed under Part V <input type="checkbox"/><br>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:<br>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"/><br>Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>                                 |   |
| Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/><br>If Yes include details of which EPP(s) here.<br>Environmental Protection (Kwinana) (Atmospheric Wastes) Policy 1999 |   |   |
| Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/><br>If Yes, include details here, eg Site is subject to SO <sub>2</sub> requirements of Kwinana EPP.  |   |   |



## 3 Executive summary of proposal and assessment

### 1. Background

Nateis Contracting Pty Ltd (Nateis) is a Western Australian family owned business operating since 2005. DER understands that Nateis established a Salvage Yard at 113 Dalison Avenue, Wattleup in 2011. Nateis currently holds a Restricted Asbestos Licence (Number: WA865) issued by the Department of Commerce. This licence allows Nateis to remove greater than 10m<sup>2</sup> of bonded (non-friable) asbestos. Nateis is also a member of the Demolition Association of WA (Licence number: WAD 248).

In 2013 it was identified that some operations at the site were consistent with a Category 62 Solid waste depot as defined in Schedule 1 of the *Environmental Protection Regulations 1987*. It was also identified that Nateis did not hold a licence pursuant to Part V Division 3 of the *Environmental Protection Act 1986*. Nateis subsequently submitted a works approval application to gain Part V authorisation. DER identified that as the site was already operating the application was to be assessed as a licence application. There is no further construction works associated with enabling the site to be considered a 'prescribed premises'.

### 2. Location and environmental setting

The site is within the City of Cockburn and zoned 'Rural' under the Metropolitan Regional Scheme. It is also located within the 'Latitude 32' industrial development zone.

The Department of Water (DoW) *Perth Groundwater Atlas* indicates that groundwater beneath the site ranges from a depth of between 23-24 metres below ground level (mBGL) (north-east to south-west). Regional groundwater flow across the site has been inferred in a south-westerly to westerly direction across the site in line with up-hydraulic gradient groundwater level contours. Locally groundwater beneath the site may likely flow in a southerly direction given on-site topography due to former quarrying activities. The nearest wetland to the site is a conservation category wetland, Mount West Brown Lake, located approximately 1.2 kilometres east of the western boundary of the premises, in the Beeliar Regional Park.

The site was originally used to quarry limestone. DER understands that sections of the quarry were filled to create three separate levelled areas (tiered site). The site was not licensed at this time. No landfilling activities are currently taking place on-site.

The closest residences to the premises are located at 117 Dalison Avenue, approximately 10 metres east of the north-eastern boundary of the premises and at 104 Dalison Avenue, approximately 25 metres north from the northern boundary of the premises. Two more residences are also located at 114 Dalison Avenue, approximately 30 metres north-east of the north-eastern boundary of the premises. The Environmental Protection Authority's Guidance Statement No 3, *Separation Distances between Industrial and Sensitive Land Uses* (June 2005) recommends a minimum buffer distance of 200 metres for a solid waste depot. The main site activities (unloading and sorting of material) are carried out approximately 100-150 metres from the nearest residence down a 4-9 metre slope into the middle and rear sections of the site (central to southern portions of the site).

### 3. Contaminated site classification

The site was classified as 'Contaminated - restricted use' on 14 April 2015. The land use of the site is restricted to commercial/industrial use which excludes more sensitive uses such as residential, childcare centres, kindergartens, pre-schools and primary schools. The site should not be redeveloped or developed for a more sensitive land use without further contamination assessment and/or remediation.

The reasons for classification noted that the site was reported because unauthorised waste disposal and possible burial of waste identified at the site in 2013. A contamination assessment was



subsequently carried out on the site in 2014 to assess potential impacts associated with the unauthorised fill and the site's suitability for a commercial land use. This assessment indicated that Dieldrin and Aldrin are present in surface and sub-surface soils (between 1 and 4 metres below ground level) in the central portion of the site at concentrations above Health Investigation Levels for residential land with accessible soil, but below Health Investigation Levels for commercial and industrial land, as published in the 'National Environment Protection (Assessment of Site Contamination) Measure 1999' (the NEPM). No potential contaminants were detected above domestic non-potable groundwater use guidelines as published in 'Assessment Levels for Soil, Sediment and Water' (Department of Environment and Conservation, 2010), in the groundwater of the site.

#### **4. Proposal**

There is no construction required to commence the licensed activities, given that the premises is already operating as a solid waste depot.

The site operates in three tiered sections. The northern front section (Tier 1) of the site, adjacent Dalison Avenue, is the public access area containing salvageable materials and the office. Down a sloped driveway, with a drop in elevation of approximately five metres, is the middle section (Tier 2); this section is for fuel storage, vehicle parking, a storage shed and brick cleaning operations. The third rear section (Tier 3), in southern part of the site, consists of a further four metre drop in elevation, at the bottom of the former quarry; this section is used for the loading, unloading, sorting and storage of construction and demolition waste. See appendix A for site layout.

Windows, doorframes, timber and roof tiles will be unloaded directly into the salvage yard section at the front of the property (Tier one). Other recyclable building materials including bricks and timber will be unloaded in the middle and lower rear sections (Tier 3) and stockpiled prior to sorting.

Bricks are to be stockpiled and cleaned ready for sale. Vegetation from salvage operations is to be stockpiled at the rear sections of the site. Management of potential emissions associated with these activities is outlined in Section 4.

The main potential emissions from the premises are fugitive emissions in the form of dust and noise. Potential impacts to human health and the environment from dust and noise emissions are likely to be moderate due to the proximity to sensitive receptors however, site management practices including dust suppression activities and siting of unloading and sorting areas assists in controlling associated risks.

An Asbestos Management Plan, prepared in accordance with DER's Asbestos Guidelines has been prepared by the licensee and is in place to manage pre-acceptance, tipping and sorting and emergency situations where asbestos materials may be identified.

## 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<br>W = Works Approval<br>L = Licence | Justification (including risk description & decision methodology where relevant)   | Reference documents  |
| General conditions               | L1.2.1<br>L1.2.2                                      | L1.2.1 requires the operation and maintenance of pollution control and monitoring equipment; has been included on the licence in line with DER's current licensing process. This condition has been included in line with DER's current licensing process.<br><br>L1.2.2 requires that the licensee immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system. This condition has been included in line with DER's current licensing process. | Application supporting documentation<br><br><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>   |
|                                  | L1.3.1 – L1.3.3                                       | L1.3.1 and L1.3.3 specifies waste acceptance criteria for the premises. L1.3.1. Table 1.3.2 also specifies a quantity limit for respective waste types that are authorised for acceptance onto the premises.<br><br>L1.3.2 requires the removal of waste from the site that does not meet the waste acceptance criteria, as specified in L1.3.1.   | Application supporting documentation<br><br><i>Asbestos Management Plan, Natelys Demolition and Salvage Yard, 113 Dalison Avenue Wattleup, WA (27 August 2015, Version 2.0).</i> |



# DECISION TABLE

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|----------------------------------|---|---|--------------------------------------|
|                                  | L1.3.3  | <p>Condition 1.3.3 and Table 1.3.2 specifies waste processing controls for the different wastes that the licensee is authorised to accept. A summary of the specified process limits is provided below:</p> <ul style="list-style-type: none"> <li>No waste shall be landfilled (buried) on-site. The licensee is not authorised under the licence to landfill any waste types;</li> </ul> <p>Inert Waste Type 1</p> <ul style="list-style-type: none"> <li>Crushing and screening of construction and demolition waste is not permitted;</li> <li>All construction and demolition waste must be unloaded and sorted within Tier 3 of the site, as depicted in the 'Tiered sections map' in Schedule 1 of the Licence. Refer to the associated risk assessment under 'Noise' in Appendix B which relates to this requirement.</li> <li>Brick cleaning shall occur within Tier 2 or Tier 3 of the site, as depicted in the 'Tiered sections map' in Schedule 1. Refer to the associated risk assessment under 'Noise' in Appendix B which relates to this requirement.</li> </ul> <p>Timber</p> <ul style="list-style-type: none"> <li>Non-salvageable timber material shall be managed and disposed of in accordance with condition 1.3.2. This requirement has been included to ensure that non-salvageable timber material is removed of to an appropriately authorised facility as soon as practicable.</li> </ul> <p>Green waste</p> <ul style="list-style-type: none"> <li>Waste shall be stored in dedicated storage areas. Stockpile dimensions shall be maintained to a height no greater than 3 metres and to a width no greater than 5 metres. A minimum 3 metre separation distance between the base of the storage areas shall be maintained. Stockpile dimensions have been specified to ensure that stockpiles are maintained at an adequate size and to allow vehicle access between storage areas in case of fire;</li> </ul> | Application supporting documentation |





# DECISION TABLE

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|----------------------------------|---|--|--|
|                                  |   | <ul style="list-style-type: none"> <li>Green waste shall not be processed or shredded on the premises. Refer to the associated justification under ' Stormwater Management and Leachates from Green Waste Storage' in Appendix B which relates to this requirement; and</li> <li>Green waste shall be removed within 7 days of being received on-site. Refer to the associated justification under ' Stormwater Management and Leachates from Green Waste Storage' in Appendix B which relates to this requirement;</li> </ul> |  |
|                                  | L1.3.4<br>L1.3.5<br>L1.3.6                            | <p>Condition 1.3.4 requires the licensee to ensure security measures are implemented on-site.</p> <p>Condition 1.3.5 requires the licence to ensure that all practical measures are undertaken to prevent windblown waste from escaping the premises boundary.</p> <p>Condition 1.3.6 prohibits the burning of waste material on-site.</p>   |  |
|                                  | L1.3.7  | <p>Asbestos Management:<br/>An assessment of the asbestos management is detailed in Appendix B.</p>  | <p><i>Asbestos Management Plan, Nateis Demolition and Salvage Yard, 113 Dalison Avenue Wattleup, WA (27 August 2015, Version 2.0).</i></p> |
| Fugitive emissions - dust        | N/A   | <p>Dust emissions:<br/>An assessment of the dust emissions is detailed in Appendix B.</p>  | <p>Application supporting documentation</p> <p>Nateis Contracting Pty</p>  |



## DECISION TABLE

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|----------------------------------|---|--|---|
|                                  |   |  | Ltd – Dust Management Plan (undated).<br><br>General provisions of the <i>Environmental Protection Act 1986</i> |
| <b>Odour</b>                     | N/A   | <p><u>Emission Description:</u><br/> <i>Emission:</i> Potential odours from the decomposition of green wastes stored on-site.<br/> <i>Impact:</i> Reduced local air quality and potential impacts on amenity of the area.<br/> <i>Controls:</i> The proponent has stated that there is to be no shredding of green waste on-site.</p> <p><u>Risk Assessment</u><br/> Consequence: Minor<br/> Likelihood: Possible<br/> Risk Rating: Moderate</p> <p><u>Regulatory Controls</u><br/> Odour emissions can be sufficiently regulated under the general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p>L1.3.3 has been included on the licence and primarily relates to managing risks associated with potential green waste leachate generation, however, the stipulated process limits also assist in controlling odours given that waste cannot be processed or shredded on-site and that it has to be removed within 7 days of being received on-site.</p> <p><u>Residual Risk</u></p> | Application supporting documentation  |

## DECISION TABLE

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|----------------------------------|---|---|--------------------------------------|
|                                  |   | Consequence: Minor<br>Likelihood: Unlikely<br>Risk rating: Moderate   |                                      |
| Noise                            | N/A   | An assessment of noise emissions is detailed in Appendix B.   | Application supporting documentation |
| Monitoring of inputs and outputs | L2.1.1  | Condition 2.1.1 requires monitoring of inputs and outputs to ensure that the licensee is compliant with waste type and quantity acceptance limits as specified in L1.3.1 and Tables 1.3.1, and to ensure waste processing controls stipulated in condition L1.3.3 and Table 1.3.2 are being complied with (i.e. requirements to remove non-salvageable timber material and the requirements to remove green waste).   | Application supporting documentation |
| Improvements                     | L3.1.1<br>L3.1.2                                      | L3.1.1 and L3.1.2 has been included on the licence to require the removal of non-salvageable timber waste located on the central southern boundary of the premises. The proposed approach to removing this waste was discussed with the licensee during a site visit on 16 August 2015. The waste is to be removed by 1 June 2016.  |                                      |
| Information                      | L4.1.1 – L4.3.1                                       | In line with DER's current licensing process the following conditions pertaining to records, reporting and notification requirements have been included on the licence.<br><br>L4.1.1 and 4.1.2 have been included on the licence as general requirements for records management and to ensure that any person left in charge of the premises or any person who performs tasks on the premises is aware of the conditions of the Licence<br><br>L4.1.3, requiring the completion of the AACR.<br><br>L4.1.4, requiring a complaints management system to be maintained. |                                      |

**DECISION TABLE**

| Works Approval / Licence section | Condition number<br>W = Works Approval<br>L = Licence | Justification (including risk description & decision methodology where relevant)   | Reference documents |
|----------------------------------|---|--|---------------------|
|                                  |   | L4.2.1 requires the submission of an Annual Environmental Report (AER) and stipulates the parameters that must be provided as part of the AER.                   |                     |
|                                  |   | L4.3.1 specifies notification requirements relating to a breach of any limit specified in the Licence (i.e. waste acceptance limits and waste processing limits) |                     |
| <b>Licence Duration</b>          | N/A   | The premises are considered to be a moderate risk rating based on the Licensed Premises Risk Appraisal. The licence is therefore issued for a period of 5 years. |                     |

## 5 Advertisement and consultation table

| Date       | Event   | Comments received/Notes  | How comments were taken into consideration |
|------------|---|--|--|
| 04/08/2014 | Application advertised in West Australian (or other relevant newspaper)   | No comments received.  | N/A  |
| 18/09/2015 | <p>Application referred to interested parties listed:</p> <p>City of Cockburn – referral letter sent 5 August 2014</p> <p>City of Cockburn – referral letter sent 18 September 2014</p> | <p>No formal response to the respective referrals was provided by the City of Cockburn.</p> <p>Discussions and email correspondence between DER and the City of Cockburn's Statutory Planning Services did however occur between 8 September 2015 and 17 September 2015, as summarised below.</p> <ul style="list-style-type: none"> <li>On the 8 and 17 September 2015 DER sought confirmation from the City of Cockburn that the planning approval (ref: 4412810 – DA13/1145) issued for No. 113 (Lot 304) Dalison Avenue, Wattleup WA 6166 on 9 June 2015, and the land use for the site, was consistent with the a Category 62 Solid waste depot, as described in Schedule 1 of the <i>Environmental Protection Regulations 1987</i>.</li> <li>On the 17 September 2015 City of Cockburn responded to DER and indicated that the primary use of the site is 'Salvage Yard', defined under the Hope Valley Wattleup Masterplan as: "premises, including outbuildings, used</li> </ul> | Noted                                      |



| Date       | Event                                     | Comments received/Notes   | How comments were taken into consideration |
|------------|---|---|--|
|            |   | for the receipt and collection, storage and sale of second-hand materials, such as building materials and scrap metal".<br><br>And as such, that this use fits the definition of a Category 62 Solid waste depot. |  |
| 20/11/2015 | Proponent sent a copy of draft instrument | Nateis Contracting Pty Ltd confirmed that they had reviewed the proposed licence for the operation and couldn't find anything that wasn't pertaining to their business.   | Noted                                      |



## 6 Risk Assessment

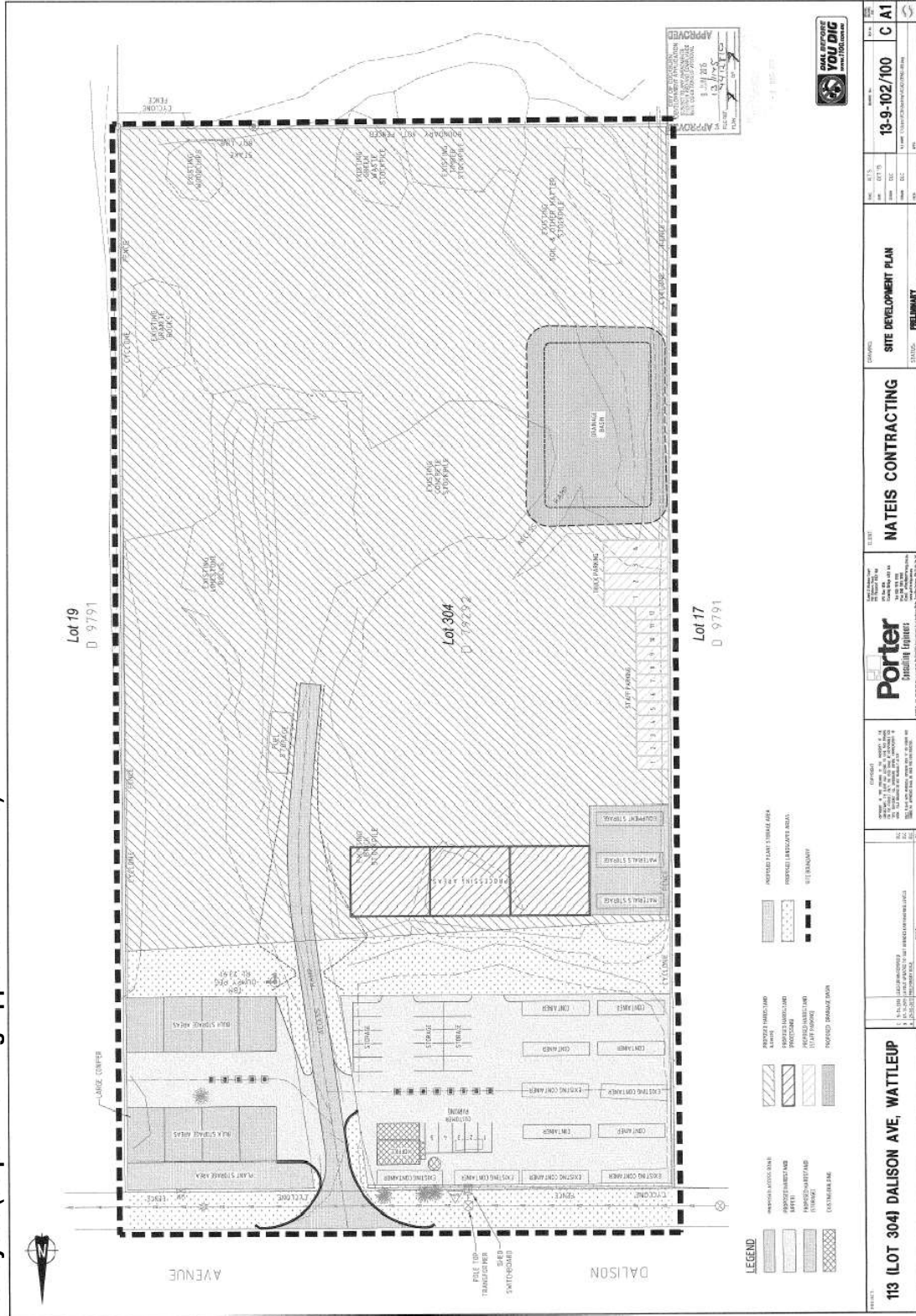
*Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management*

**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    |



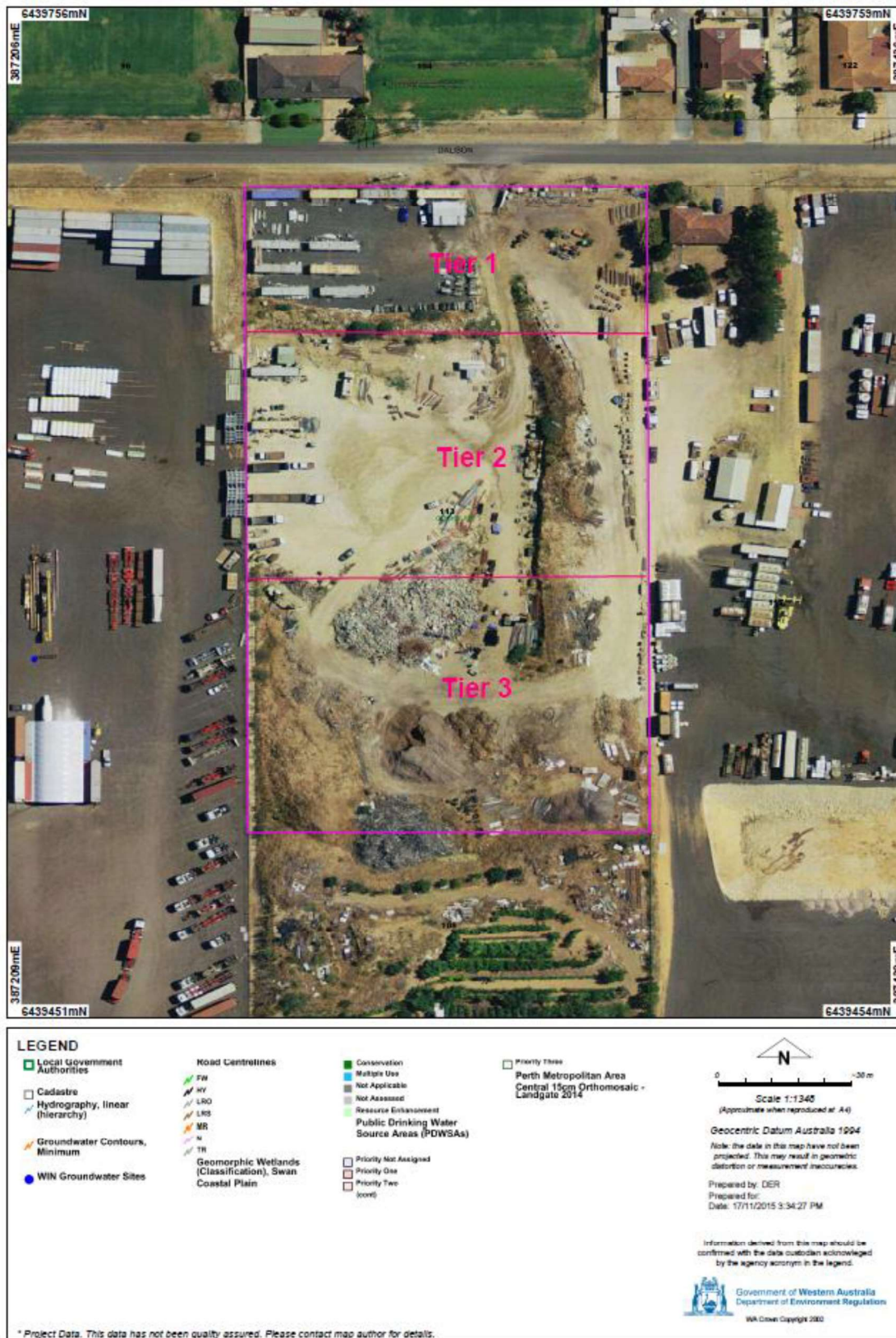
# Appendix A - Site Plans







### Tiered sections of the premises





## Appendix B

### Stormwater Management and Leachates from Green Waste Storage

#### Emission Description

**Emission:** Stormwater potentially contaminated from site activities and leachate derived from unprocessed inert waste type 1 and green waste storage and sorting operations.

**Impact:** Contamination of surrounding land, underlying groundwater and surface water drainage lines. Associated impacts from stormwater that may be potentially contaminated from the receipt, handling and storage of inert waste type 1 solid waste is unlikely to cause adverse impacts given the nature of the waste. Leachate from fresh green waste can contain a variety of organic compounds including terpenes and phenols which are toxic to aquatic organisms and which can bioaccumulate in tissue in some organisms. Additionally, anaerobic decomposition of plant material can take place with a period of a few days in large stockpiles (accompanied by large temperature increases), and can produce leachate that has a high biological oxygen demand (BOD) and nutrient concentrations Samis *et al.*, 1999).

Groundwater beneath the site ranges from a depth of between 23-24 metres below ground level (mBGL) (north-east to south-west). Regional groundwater flow across the site has been inferred in a south-westerly to westerly direction across the premises in line with up-hydraulic gradient groundwater level contours. Locally groundwater beneath the site may likely flow in a southerly direction given on-site topography due to former quarrying activities (site grades to the south). The nearest wetland to the site is a conservation category wetland, Mount West Brown Lake, located approximately 1.2 kilometres east of the western boundary of the premises, in the Beeliar Regional Park. Given the distance to this wetland impacts from surface water run-off is unlikely. Potentially impacted groundwater may flow towards and discharge to the lake however this has not been determined as part of this assessment.

**Controls:** The top section of the site (Tier 1) adjacent to Dalison Avenue has been covered with reconstituted road pavement material and all rainfall is channelled into a series of soak wells. There will be no surface runoff from this area to the lower work areas (Tier 2 and 3). Rainfall runoff within the middle and rear section of the site (Tier 2 and 3) is to be channelled to the sump/drainage basin located adjacent to the western boundary of the site.

Nateis have not provided any information on proposed controls to manage potential leachate derived from green waste storage. Naties have not proposed to store green waste on a bunded hardstand area.

#### Risk Assessment

**Consequence:** Moderate

**Likelihood:** Possible

**Risk Rating:** Moderate

#### Regulatory Controls

The licensee must take practicable measures to prevent the contamination of stormwater on-site. No licence conditions have been imposed on the licence as it is considered that any associated impacts can be adequately controlled under the general provisions of the *Environmental Protection Act 1986*.

To minimise the potential for leachate generation from green waste stored on-site, L1.3.3 specifies a series of process limits relating to the receipt, handling and storage of green waste prior to disposal, as summarised below:



- Green waste shall not be processed or shredded on the premises. Shredded or processed green waste material has the ability to breakdown at a faster rate. Including this limitation in the licence will mitigate the rate at which decomposition can occur; and
- Green waste shall be removed within 7 days of being received on-site. Limiting the time in which green waste material can be stored on-site will also mitigate the risk of decomposition and leachate generation occurring.

#### Residual Risk

*Consequence:* Moderate

*Likelihood:* Possible

*Risk Rating:* Moderate

#### References:

Samis, S.C., Liu, S.D., Wernick, B.G. and Nassichuk, M.D., 1999. *Mitigation of Fisheries Impacts from the Use and Disposal of Wood Residue in British Columbia and the Yukon*. Canadian Department of Fisheries and Oceans Technical Report No 2296. The report is available from web site <http://www.dfo-mpo.gc.ca/Library/243104.pdf>.

## **Asbestos Management**

#### Emission Description

*Emission:* Potential asbestos fibres entering the air or contaminating land from the receipt, storage and handling of construction and demolition waste.

*Impact:* Asbestos fibres can pose long term health impacts such as asbestosis, lung cancer and mesothelioma.

*Controls:* Nates have provided details on several control measures to manage the potential for asbestos release at the premises:

- Nates currently holds a Restricted Asbestos Licence (Number: WA865). This licence allows Nates to remove greater than 10m<sup>2</sup> of bonded (non-friable) asbestos. Bonded ACM waste collected from a demolition site is transported directly to appropriately authorised facility (Wastestream) for disposal. ACM is not transported back to the Nates premises as part of normal operations.
- An asbestos management plan titled *Asbestos Management Plan, Nates Demolition and Salvage Yard, 113 Dalison Avenue Wattleup, WA* (27 August 2015, Version 2.0) has been prepared in accordance with the *Guidelines for managing asbestos at construction and demolition waste recycling facilities* (Department of Environment and Conservation, December 2012).
- Only waste sourced from Nates Contracting Pty Ltd construction and demolition operations is to be accepted at the premises.
- Dust is to be managed in accordance with the *Nates Contracting Pty Ltd – Dust Management Plan* (undated). Refer to the 'Fugitive emissions – Dust' section below for further detail.

#### Risk Assessment

*Consequence:* Major

*Likelihood:* Unlikely

*Risk Rating:* Moderate

#### Regulatory Controls

L1.3.1 and Table 1.3.2. specifies waste acceptance criteria in line with DER's current licensing process. The specifications listed in Table 1.3.2 requires that construction and demolition waste loads containing visible asbestos or ACM shall not be accepted.





L1.3.3 and Table 1.3.2 specifies a series of process limits relating to the receipt, handling and storage of inert waste type 1 materials prior to disposal, as summarised below:

- Crushing and screening of construction and demolition waste is not permitted;
- All loads shall be wet down prior to tipping; and
- All construction and demolition waste received at the premises must be unloaded and sorted within Tier 3 of the premises, as depicted in the 'Tiered sections map' in Schedule 1.

Tier 3 is located in a depressed area of the site and comprises a reduced elevation of approximately 9 metres (north to south) from that of Tier 1 (front section – adjacent Dalison Avenue) from which the closest residential receptors lies within 10 metres from the north-eastern boundary of the premises (at 104 Dalison Avenue).

L1.3.7 requires the licensee to undertake activities on the Premises and manage asbestos and ACM in accordance with the *Asbestos Management Plan, Nateis Demolition and Salvage Yard, 113 Dalison Avenue Wattleup, WA, Dated 27 August 2015, Version 2.0*. This plan has been prepared in accordance with the *Guidelines for managing asbestos at construction and demolition waste recycling facilities* (Department of Environment and Conservation, December 2012).

#### Residual Risk

Consequence: Major

Likelihood: Rare

Risk Rating: Moderate

## **Fugitive emissions - dust**

#### Emission Description

*Emission:* Dust from truck and vehicle movements, waste tipping area, handling and cleaning of building demolition material, stockpiling of material and loading and unloading of waste.

*Impact:* Nuisance quantities of dust and potential human health issues associated with respirable dust fractions.

*Controls:* The proponent has committed to a number of dust control measures which are specified in the *Nateis Contracting Pty Ltd – Dust Management Plan* (undated) prepared in accordance with planning conditions (DA 13/1145), as summarised below:

- Materials to be manually sprayed by high pressure water hoses as they are tipped off;
- Stockpiles to have sprinklers set up on them to maintain them in a damp state;
- Any sorting of loads to be sprayed down during works by water tanker or hoses;
- All trucks leaving site to be tarped to prevent material blow off;
- Use of a water truck to suppress dust on the internal haulage roads and waste loading/unloading and sorting areas;
- Permanent sprinkler system set up on main entrance road to be utilised in the event of extreme drying conditions; and
- Wetting agent to be added to water tanker and sprayed on-site to reduce working surface from powdering up.

The main tipping and handling operations occur in the middle (Tier 2) and rear (Tier 3) sections which have a reduced elevation to that of the front section (Tier 1) which is Adjacent Dalison Avenue.

Asbestos containing material (ACM) will not be accepted on-site. Nateis Contracting Pty Ltd has provided an Asbestos Management Plan prepared in accordance with the *with the Guidelines for managing asbestos at construction and demolition waste recycling facilities* (Department of



*Environment and Conservation, December 2012).* Refer to risk assessment under 'Asbestos Management' (above) for further detail.

Risk Assessment

*Consequence:* Moderate

*Likelihood:* Unlikely

*Risk Rating:* Moderate

Regulatory Controls

Dust emissions are adequately managed by the general provisions of the *Environmental Protection Act 1986*. DER will monitor site operations and complaints associated with dust emissions and where warranted the licence may be amended to include prescriptive conditions relating to the management of dust emissions.

Residual Risk

*Consequence:* Moderate

*Likelihood:* Unlikely

*Risk Rating:* Moderate

## Noise

Emission Description:

*Emission:* Noise may be generated from the stockpiling of material, loading and unloading of waste and vehicle movement on-site.

*Impact:* Nuisance noise at nearby receptors and potential impacts on amenity of the area. The closest residences to the premises are located at 117 Dalison Avenue, approximately 10 metres east of the north-eastern boundary of the premises and at 104 Dalison Avenue, approximately 25 metres north from the northern boundary of the premises. Two more residences are also located at 114 Dalison Avenue, approximately 30 metres north-east of the north-eastern boundary of the premises. The Environmental Protection Authority's Guidance Statement No 3, *Separation Distances between Industrial and Sensitive Land Uses* (June 2005) recommends a minimum buffer distance of 200 metres for a solid waste depot. The main site activities (unloading and sorting of material) are carried out approximately 100-150 metres from the nearest residence down a 4-9 metre slope into the middle and rear sections of the site (central to southern portions of the site).

*Controls:* In response to a request for further information from DER (dated 14 July 2015), Nateis commissioned Herring Storer Acoustics to undertake an acoustic assessment for the premises; Letter Report: *113 Dalison Avenue - Wattleup, Acoustic Assessment* (Herring Storer Acoustics, 26 August 2015).

Noise level measurements were carried out on the 24th August 2015 for normal recycling operation to determine noise emissions to nearby noise sensitive premises and the compliance status with respect to the *Environmental Protection (Noise) Regulations 1997*.

The assessment summarised that operations at the site consist of occasional trucks entering or leaving the site, occasional loading and movement of items on pallets in the top yard area (Tier 1 nearest the residences), brick chipping and general work in the middle section (Tier 2), and demolition rubble dumping, sorting and loading of trucks in the rear section (Tier 3). The assessment noted that the middle section and rear section (Tier 2 and 3) are at reduced level (RL) compared to front section (Tier 1) which is level and adjacent Dalison Avenue, the site having been a former quarry. It was also noted that the rear section is surrounded by bunds to the level of Dalison Avenue. The western part of the top yard is lined with offices and sea containers along the boundary, forming an acoustic barrier to No. 104 Dalison Avenue and the western premises.



The assessment concluded that the noise emissions from 113 Dalison Avenue operations comply with the requirements of the *Environmental Protection (Noise) Regulations 1997* (as amended). The assessment also noted that compared to the noise from unrelated passing truck traffic on Dalison Avenue, the noise emissions from the operations are significantly less and should not adversely affect the amenity of the noise sensitive premises.

The proponent also submitted the *Nateis Contracting Pty Ltd – Operation Noise Management Plan* (August 2015) which was prepared in accordance with planning conditions (DA 13/1145). The plan includes noise attenuation measures such as shutting down machinery when not in use, minimising the need to move plant and equipment around site and maintaining equipment in good working order. The management plan contains provisions to undertake monitoring if excessive complaints are received.

#### Risk Assessment

*Consequence:* Minor

*Likelihood:* Unlikely

*Risk Rating:* Moderate

#### Regulatory Controls

To ensure that operations on-site remain reflective of the 'normal recycling operations' as assessed in the acoustic assessment, L1.3.3 has been included on the licence which limits the processing of waste materials to the middle (Tier 2) and rear (Tier 3) sections of the site, as summarised below:

- All construction and demolition waste must be unloaded and sorted within Tier 3 of the premises, as depicted in the 'Tiered sections map' in Schedule 1.
- Brick cleaning shall occur within Tier 2 or Tier 3 of the premises, as depicted in the 'Tiered sections map' in Schedule 1.

Noise emissions are also adequately controlled under the *Environmental Protection (Noise) Regulations 1997* (Noise Regs). The Licensee will need to comply with the provisions of the Noise Regs.

#### Residual Risk

*Consequence:* Minor

*Likelihood:* Unlikely

*Risk Rating:* Moderate