



**Licence Number** L8861/2014/1

**Licence Holder** Karratha Recycling Pty Ltd

**ACN** 163 991 106

**File Number:** DER2014/002439-1

**Premises**

Karratha Recycling Pty Ltd  
Lot 111 and 112 Exploration Drive  
GAP RIDGE WA 6714

Legal Description –  
Being Lot 111 and 112 on Plan 75061

**Date of Report** 7/02/2020

# 1. Definitions and interpretation

## Definitions

In this Amendment Report, the terms in Table 1 have the meanings defined.

**Table 1: Definitions**

Term	Definition
AACR	Annual Audit Compliance Report.
ACN	Australian Company Number.
Amendment Report	refers to this document.
annual period	means the inclusive period from 1 January until 31 December in the same year.
AS/NZS 5667.1	means the Australian Standard AS/NZS 5667.1 <i>Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples</i> .
AS 4323.1	means the Australian Standard AS4323.1 <i>Stationary Source Emissions Method 1: Selection of sampling positions</i> .
AS/NZS 5667.11	means the Australian Standard AS/NZS 5667.11 <i>Water Quality – Sampling – Guidance on sampling of groundwaters</i> .
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the <i>Environmental Protection Regulations 1987</i> (WA).
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 JOONDALUP DC WA 6919 <a href="mailto:info@dwer.wa.gov.au">info@dwer.wa.gov.au</a>
controlled waste	has the definition in <i>Environmental Protection (Controlled Waste) Regulations 2004</i> .
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (WA) and designated as responsible for the administration of Part V, Division 3 of the EP Act.
discharge	has the same meaning given to that term under the EP Act.

Term	Definition
DWER	Department of Water and Environmental Regulation.
emission	has the same meaning given to that term under the EP Act.
EP Act	<i>Environmental Protection Act 1986</i> (WA).
existing licence	means the Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this review.
freeboard	means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point.
Licence Holder	Karratha Recycling Pty Ltd.
mbgl	metres below ground level.
NATA	means the National Association of Testing Authorities, Australia.
NATA Accredited	means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis.
prescribed premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Amendment Report applies, as specified at the front of this Amendment Report.
revised licence	the amended Licence issued under Part V, Division 3 of the EP Act, with changes that correspond to the assessment outlined in this Amendment Report.
risk event	as described in <i>Guidance Statement: Risk Assessment</i> .
six monthly	means the 2 inclusive periods from 1 January to 30 June and 1 July to 31 December each year.
start-up	means the period when plant or equipment is brought from inactivity to normal operating conditions.

## 2. Amendment Description

This notice is limited only to an amendment for Category 61. No changes to the aspects of the original Licence relating to Categories 35 or 61A have been requested by the Licence Holder.

The following guidance statements have informed the assessment and decision outlined in this Amendment Report.

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Licence Duration (August 2016)*
- *Guidance Statement: Decision Making (February 2017)*
- *Guidance Statement: Risk Assessment (February 2017)*
- *Guidance Statement: Environmental Siting (November 2016)*

### 2.1. Purpose and scope of assessment

Karratha Recycling Pty Ltd (the Licence Holder) submitted an application to amend Licence L8861/2014/1 on 19 November 2019. The amendment relates to an additional evaporation pond (pond 6) constructed under W5806/2015/1 and subsequent increase to the Category 61 liquid waste facility's (LWF's) design capacity from 70,000 to 100,000 tonnes per annual period. This amendment also includes the amalgamation of Amendment Notices 1, 2 and 3 into the licence.

Table 2 below outlines the proposed changes to Licence L8861/2014/1

**Table 2: Proposed design capacity changes**

Category	Current design capacity	Proposed design capacity	Description of proposed amendment
35	40,000 tonnes per annual period	N/A	No change proposed
61	70,000 tonnes per annual period	100,000 tonnes per annual period	Additional evaporation pond - 80m x 70m x 3.5m  Increase in capacity of 30,000 tonnes per annum
61A	20,000 tonnes per annual period	N/A	No change proposed

### 2.2. Consolidation of Licence L8861/2014/1

As part of this amendment package DWER has consolidated the licence by incorporating changes made under the following Amendment Notices:

- Amendment Notice 1, granted 7 February 2018 – Addition to controlled waste acceptance;
- Amendment Notice 2, granted 18 May 2018 – Permit use of an additional evaporation pond (pond 5) and increase to design capacity; and
- Amendment Notice 3, granted 6 May 2018 – Additions to controlled waste acceptance

In consolidating the licence, the CEO has:

- updated the format and appearance of the Licence;
- deleted the redundant AACR form set out in schedule 2 of the previous licence and advise the Licence Holder to obtain the form from the Department's website;
- revised licence condition's numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

As part of this amendment to the licence, previously granted Amendment Notices 1, 2 and 3 have been consolidated into the existing Licence document. No additional assessment has been undertaken as part of this consolidation. Decisions related to the consolidated licence are published in the previous Decision Report and previous Amendment Notices 1, 2 and 3 for L8861/2014/1. It is noted that consolidation of the amendments made as part of previous decisions are corrections made under Section 59(1) (e), (f), (h), (i), or (j) of the *EP Act*, and therefore may not be appealed against in accordance with Section 105 (b) of the *EP Act*.

Previously issued Amendment Notices will remain on the DWER website for future reference and will act as a record of DWER's decision making.

### 3. Other approvals

The City of Karratha has provided DWER with the following information relating to planning approvals as outlined in Table 3.

**Table 3: Relevant approvals**

Legislation	Number	Approval
<i>City of Karratha Local Planning Scheme No.8 [LPS8]</i>	<i>Planning Approval DA14053 (DWERDT247906)</i>	<i>Recycling Concrete Plant, Wastewater Treatment Ponds and Asphalt Plant</i>

### 4. Amendment history

Table 4 provides the amendment history for L8861/2014/1

**Table 4: Licence amendments**

Instrument	Issued	Amendment
<i>L8861/2014/1</i>	<i>7 February 2018</i>	<i>Amendment Notice 1 - Addition to controlled waste acceptance</i>
<i>L8861/2014/1</i>	<i>18 May 2018</i>	<i>Amendment Notice 2 - Permit use of an additional evaporation pond (pond 5) and increase to design capacity</i>
<i>L8861/2014/1</i>	<i>6 May 2018</i>	<i>Amendment Notice 3 - Additions to controlled waste acceptance</i>
<i>L8861/2014/1</i>	<i>7 February 2020</i>	<i>Permit use of an additional evaporation pond (pond 6) and increase to design capacity. Amalgamation of all previous amendments into the Licence</i>

### 5. Location and receptors

Table 5 below lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 5: Receptors and distance from activity boundary**

Residential and sensitive premises	Distance from Prescribed Premises
<i>Temporary accommodation (Civeo Karratha Village)</i>	<i>~ 2.05km northeast of premises boundary</i>
<i>Residential receptors (Madigan Estate – Baynton)</i>	<i>~ 2.5km northeast of premises boundary</i>

Table 6 below lists the relevant environmental receptors in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

**Table 6: Environmental receptors and distance from activity boundary**

Environmental receptors	Distance from Prescribed Premises
<i>Groundwater</i>	<i>Between 7.3-10 metres below ground level, flowing in a northerly direction toward Nickol Bay</i>
<i>Threatened Ecological Community (TEC)</i>	<i>Premises is within a TEC buffer zone</i>
<i>7 Mile Creek</i>	<i>500m east</i>

## 6. Risk assessment

Table 7 below describes the risk events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. This table identifies whether the emissions present a material risk to public health or the environment, requiring regulatory control

**Table 7: Risk assessment for proposed amendments during operation<sup>1</sup>**

Risk Event						Consequence rating	Likelihood rating	Risk	Reasoning
Source/Activities		Potential emissions	Potential receptors	Potential pathway	Potential adverse impacts				
<b>Cat 61</b> <i>Liquid waste facility</i>	Acceptance, treatment and discharge of:  <b>K210</b> septage waste – domestic wastes from apparatus for the treatment of sewage,  <b>K110</b> Waste from grease traps,  <b>K130</b> sewage waste from reticulated sewerage systems,	Odour	Accommodation Village 2.05km away	Air/wind dispersion	Amenity impacts	Minor	Unlikely	<b>Moderate</b>	The receival pits which feed into the receival ponds will be hosed down after every load is deposited to remove any remnants. The discharge into the receival ponds is done beneath the surface of the ponds so to not comprise the surface layer crust on the ponds.  The Delegated Officer noted that the nearest sensitive receptor is more than 2km from the premises and notes that no odour complaints have been received by DWER regarding the premises.  The Delegated Officer considers any odour emissions can be regulated under S49 of the EP Act.
	<b>L100</b> car and truck wash waters,	Discharge to land - Spillage of waste materials and overtopping of pond embankments to the environment	Groundwater Between 7.3-10 mbgl.  7-mile creek 500m south-east. TEC buffer zone within the premises.  On-site soils.	Direct discharge  Infiltration to groundwater through underlying soils.  Overland flow	Contamination of land, underlying groundwater and surface waters. Impacts to TEC communities	Minor	Unlikely	<b>Moderate</b>	The capacity of the additional evaporation pond is 19,600m <sup>3</sup> . The Licence Holder has also outlined that they intend to allow 500mm freeboard (16,800m <sup>3</sup> ) the total capacity of the LWF is now 49,840.8m <sup>3</sup>

	<p><b>L150</b> industrial wash water contaminated with a controlled waste,</p> <p><b>D300</b> high-saline industrial wash waters</p> <p>- into additional evaporation pond (pond 6)</p>								<p>(all ponds minus 500mm freeboard) providing sufficient capacity. The yearly evaporation rate for the area is 3.3m.</p> <p>The Delegated Officer considers the consequence of a spill of partially treated wastewater to receptors is minor, with low-level on-site impacts to soils and the TEC community, and minimal off-site impacts due to the depth to groundwater, no known uses of groundwater in the area, and the distance to 7-mile River.</p> <p>The Delegated Officer considers the likelihood of a spillage to be unlikely due to the freeboard condition requiring 500mm on all ponds and the pond integrity being installed in accordance with the requirements of W5806/2015/1.</p> <p>The Delegated Officer considers the overall risk of spillage to be moderate.</p>
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Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Department's Guidance Statement: Risk Assessments (February 2017)



## 7. Consultation

**Table 8: Summary of consultation**

Method	Comments received	DWER response
City of Karratha advised of proposal on 20/12/2019 (A1853979) and follow up information provided on 24/01/2020 (DWERDT247749).	City of Karratha Principal Planner advised DWER on 24/01/2020 that two evaporation ponds did not have required planning approvals (DWERDT247906).	Licence Holder advised of requirement for planning approvals on 28/01/2020 (DWERDT248253).  City of Karratha confirmed that contact will be made with Licence Holder to ensure required planning approvals are sought (DWERDT248319).
Applicant referred draft documents on 29/01/2020 (A1862753).	Written correspondence received on 04 February 2020 from applicant (A1864197).  Confirmation that contact has been made with the City of Karratha and an application is to be made to obtain required planning approvals. Also a request to waive 21 day formal comment period.	Amended instrument to be granted.

## 8. Conclusion

The Delegated Officer has determined that an amendment be made to the Licence conditions to allow the operation of the additional evaporation pond and increase in Category 61 throughput. The Delegated Officer considered the potential impacts of odour emissions and discharges to land from spillages and overtopping of evaporation ponds. The existing containment infrastructure at the premises which is approved in L8861/2014/1 allows the acceptance sewage, septage waste, waste from grease traps, sewage waste from reticulated sewerage system, high-saline industrial wash waters, car and truck wash waters and industrial wash water contaminated with a controlled waste. Conditions relating to pond integrity are already on the Licence and are sufficient in providing environmental protection and preventing an unauthorised discharge from compromised ponds.

The capacity of the premises has been increased to 100,000 tonnes per year. The Delegated Officer notes that the ponds do not appear to be sufficiently sized to accommodate this volume on an ongoing annual basis, however it is understood that the Licence Holder has advised that the proposed tonnage represents a maximum acceptance volume in a 'boom year' which and would need to be offset by periods of reduced waste acceptance to prevent overtopping. The Delegated Officer accepts that the ponds are adequately sized to allow this method of operation and is satisfied that overtopping of the ponds will be adequately regulated through Condition 8 of the Licence which requires a freeboard of 500mm to be maintained on all ponds.

As DWER has been made aware by the City of Karratha that two evaporation ponds at the premises

do not have planning approval, DWER has contacted the Licence Holder advising that an instrument granted by DWER only provides a defence for the occupier for offences under Part V, Division 3 of the *Environmental Protection Act 1986*, provided the conditions contained within the licence have been complied with and not for any offences under planning legislation. An occupier who begins works on or operates a prescribed premises without the necessary approvals from planning authorities does so at its own risk. Both the Licence Holder and the City of Karratha have confirmed that they will make contact with each other to ensure the required planning approvals for all evaporation ponds are obtained.

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a licence amendment will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## 8.1. Summary of amendments

Table 9 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 9: Licence conversion map for amendments and new licence format**

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
N/A	-	-	Inclusion of 'ACN' and 'Date of Amendment' to licence cover page.
N/A	-	-	Relocation and updating of 'Instrument Log' to include all Licence amendments. Renamed 'Licence history'.
N/A	-	-	Updates to wording - 'Department of Regulation' (DER) to 'Department of Water and Environmental Regulation' (DWER). 'Licensee' to 'Licence Holder'
N/A	-	-	Inclusion of 'Table 11 – Definitions' and addition of referenced terms used in the Licence.
N/A	-	-	Addition of a 'Premises boundary' table defining the premises coordinates.
1.1.1	<i>In the Licence, definitions from the</i>	-	No change to wording - Relocated from Conditions of

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>Environmental Protection Act 1986 apply unless the contrary intention appears.</i>		Licence to heading 'Interpretation'.
1.1.2	<i>For the purposes of this Licence, unless the contrary intention appears: ...</i>	-	Inclusion of "terms are defined in Table 12" - Relocated from Conditions of Licence to heading 'Definitions'.
1.1.3	<i>Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.</i>	-	Merged with Condition 1.1.4 and minor word changes - Relocated from Conditions of Licence to heading 'Interpretation'.
1.1.4	<i>Any reference to a guideline or code of practice in the Licence means the current version of the guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guidelines or code of practice made during the term of this Licence.</i>	-	Merged with Condition 1.1.3 - Relocated from Conditions of Licence to heading 'Interpretation'.
1.1.5	<i>Nothing in the Licence shall be taken to authorise any emission that is not mentioned</i>	-	No change to wording - Relocated from Conditions of

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<p><i>in the Licence, where the emission amounts to:</i></p> <p><i>(a) pollution;</i></p> <p><i>(b) unreasonable emission;</i></p> <p><i>(c) discharge of waste in circumstances likely to cause pollution; or</i></p> <p><i>(d) being contrary to any written law</i></p>		Licence to heading 'Interpretation'.
1.2.1	<p><i>The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.</i></p>	1	No change.
1.2.2	<p><i>The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.</i></p>	2	No change.
1.2.3	<p><i>The Licensee shall:</i></p> <p><i>(a) implement all practical measures to</i></p>	3	No change.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<p><i>prevent stormwater run-off becoming contaminated by the activities on the Premises; and</i></p> <p><i>(b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.1</i></p> <p><i>Note1: The Environmental Protection (Unauthorised Discharges) Regulations 2004 make it an offence to discharge certain materials into the environment.</i></p>		
1.3.1	<i>The Licensee shall record and investigate the exceedance of any descriptive or numerical limit in this section.</i>	4	No change.
Table 1.3.1	<i>Waste acceptance</i>	Table 1	<p>The addition of K130, D300, L100 and L150 controlled wastes and specifications.</p> <p>Increase quantity limit for liquid waste from 70,000 to 100,00 tonnes per annual period.</p>
1.3.2	<p><i>The Licensee shall only allow waste to be accepted on to the Premises if:</i></p> <p><i>(a) it is of a type listed in Table 1.3.1; and</i></p> <p><i>(b) the quantity accepted is below any limit listed in Table 1.3.1; and</i></p>	5	Reference to Table number 1.3.1 changed to Table 1.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>(c) it meets any specification listed in Table 1.3.1.</i>		
Table 1.3.2	<i>Waste processing</i>	Table 2	<p>The addition of waste types – sewage waste from reticulated sewerage system, high saline industrial wash waters, car and truck wash waters, industrial wash water contaminated with a controlled waste.</p> <p>The process addition of direct disposal for evaporation in pond 4, 5 and 6.</p> <p>The inclusion of evaporation ponds 5 and 6 and increase to treatment capacity from 70,000 to 100,000 tonnes per annual period.</p>
1.3.3	<i>The Licensee shall ensure that the wastes accepted onto the Premises are only subjected to the processes set out in Table 1.3.2 and in accordance with any process requirements described in that table.</i>	6	Reference to Table number 1.3.2 changed to Table 2.
Table 1.3.3	<i>Containment infrastructure</i>	Table 3	<p>The addition of Pond 5 and 6 and associated material and requirements.</p> <p>Pond 4 incorrectly referenced to be lined in accordance with</p>

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
			WQPN 27. Changed to WQPN 26 as this correctly refers to the requirements for synthetic membranes.  The inclusion of all pond measurements.
1.3.4	<i>The Licensee shall ensure that waste material is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.3.</i>	7	Reference to Table number 1.3.3 changed to Table 3.
1.3.5	<i>The Licensee shall manage all wastewater treatment, receiving, facultative and storage evaporation ponds such that:  (a) overtopping of the ponds does not occur; and  (b) a freeboard equal to, or greater than, 500mm is maintained;  (c) the integrity of the containment infrastructure is maintained;  (d) trapped overflows are maintained on the outlet of ponds to prevent carry-over of surface floating matter; and  (e) vegetation is prevented from encroaching onto pond surfaces or inner pond embankments.</i>	8	No change.
1.3.6	<i>The licensee shall ensure that automatic safeguards are incorporated within the asphalt manufacturing process to prevent the</i>	9	No change.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>ignition of bitumen within the drum.</i>		
1.3.7	<p><i>The Licensee shall ensure that:</i></p> <p><i>(a) the baghouse is operational prior to start-up of the drier and operated continuously whilst the drier is operating;</i></p> <p><i>(b) the baghouse filters are regularly inspected; and</i></p> <p><i>(c) when detected, blocked, frayed or leaking, baghouse filters are immediately replaced.</i></p>	10	No change.
1.3.8	<i>The Licensee shall ensure that bulk materials are stored in a manner which minimises the generation of airborne dust.</i>	11	No change.
2.1.1	<i>The Licensee shall record and investigate the exceedance of any descriptive or numerical limit specified in any part of section 2 of this Licence.</i>	12	Reference to 'section 2' has been changed to 'Emissions section'.
2.2.1	<i>The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 it is done so in accordance with the conditions of this Licence.</i>	13	Reference to Table number 2.2.1 changed to Table 4.
Table 2.2.1	<i>Emission points to air</i>	Table 4	No change.



Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
2.2.2	<i>The Licensee shall not cause or allow point source emissions to air greater than the limits listed in Table 2.2.2.</i>	14	Reference to Table number 2.2.2 changed to Table 5.
Table 2.2.2	<i>Point source emission limits to air</i>	Table 5	No change
3.1.1	<p><i>The Licensee shall ensure that:</i></p> <p><i>(a) all water samples are collected and preserved in accordance with AS/NZS 5667.1 unless otherwise indicated in the relevant table;</i></p> <p><i>(b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and</i></p> <p><i>(c) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured unless indicated otherwise in the relevant table.</i></p>	15	No change.
3.1.2	<p><i>The Licensee shall ensure that:</i></p> <p><i>(a) six monthly monitoring is undertaken at least 5 months apart; and</i></p> <p><i>(b) annual monitoring is undertaken at least 9 months apart.</i></p>	16	No change.
3.1.3	<i>The Licensee shall record production or throughput data and any other process parameters relevant to</i>	17	No change.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>any non-continuous monitoring undertaken.</i>		
3.1.4	<i>The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.</i>	18	No change.
3.1.5	<i>The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.</i>	19	No change.
3.2.1	<i>The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.</i>	20	Reference to Table number 3.2.1 changed to Table 6.
Table 3.2.1	<i>Monitoring of point source emissions to air</i>	Table 6	No change.
3.2.2	<i>The Licensee shall ensure that sampling required under condition 3.2.1 of the Licence is undertaken at sampling locations in accordance with the AS 4323.1.</i>	21	Reference to condition 3.2.1 changed to condition 20.
3.2.3	<i>The Licensee shall ensure that all non-continuous sampling and analysis undertaken pursuant to condition 3.2.1 is undertaken by a holder</i>	22	Reference to condition 3.2.1 changed to condition 20.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>of NATA accreditation for the relevant methods of sampling and analysis.</i>		
3.3.1	<i>The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.</i>	23	Reference to Table 3.3.1 changed to Table 7.
Table 3.3.1	<i>Monitoring of inputs and outputs</i>	Table 7	No change
3.4.1	<i>The Licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table.</i>	24	Reference to Table 3.4.1 changed to Table 8.
Table 3.4.1	<i>Monitoring of ambient groundwater quality</i>	Table 8	MB1 and MB2 changed to Monitoring Bore 1 and Monitoring Bore 2.
4.1.1	<i>The Licensee shall complete the improvements in Table 4.1.1 by the date of completion in Table 4.1.1.</i>	-	As Condition 4.1.1 requires the first annual report by a date that has already passed and the requirement to submit annual reports are captured in Condition 29, this Condition is now redundant and has been removed.
Table 4.1.1	<i>Improvement program</i>	-	As Table 4.1.1 requires the first annual report by a date that has already passed and the requirement to submit annual reports are captured in Condition 29, this Table is now redundant and has been removed.
5.1.1	<i>All information and records required by the Licence shall:  (a) be legible;  (b) if amended, be amended in such a way that the original and subsequent</i>	25	Reference to Condition 5.1.1(d) changed to Condition 25(d).

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<p><i>amendments remain legible or are capable of retrieval;</i></p> <p><i>(c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and</i></p> <p><i>(d) for those following records, be retained until the expiry of the Licence and any subsequent licence:</i></p> <p><i>(i) off-site environmental effects; or</i></p> <p><i>(ii) matters which affect the condition of the land or waters.</i></p>		
5.1.2	<p><i>The Licensee shall ensure that:</i></p> <p><i>(a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and</i></p> <p><i>(b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.</i></p>	N/A	This condition is removed as it is now redundant
5.1.3	<p><i>The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of</i></p>	26	No change.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>the Act for the Premises for the previous annual period.</i>		
5.1.4	<i>The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.</i>	27	No change.
5.2.1	<i>The Licensee shall submit to the CEO an Annual Environmental Report by 31 March in each year after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.</i>	28	Reference to Table 5.2.1 changed to Table 9.
Table 5.2.1	<i>Annual Environment Report</i>	Table 9	Reference is now made to updated conditions and tables.
5.2.2	<i>The Licensee shall ensure that the Annual Environmental Report also contains:  (a) any relevant process, production or operational data recorded under condition 3.1.3; and  (b) an assessment of the information</i>	29	Reference to Condition 3.1.3 changed to Condition 17.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
	<i>contained within the report against previous monitoring results and Licence limits.</i>		
Table 5.2.2	<i>Non-annual reporting requirements</i>	Table 10	Removal of "Note 1: Forms are in Schedule 2" as schedule 2 is now redundant and has been removed from the Licence. Licence Holder to refer to DWER website for all applicable forms.
5.2.3	<i>The Licensee shall submit the information in Table 5.2.2 to the CEO at the Contact Address according to the specifications in that table.</i>	N/A	Condition removed as it is now redundant.
5.3.1	<i>The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the CEO and in accordance with the notification requirements of the table.</i>	30	Reference to Table 5.3.1 changed to Table 11.  Requirement to notify of a breach of limit is removed as this is adequately covered by the requirement to submit an AACR and the requirements of section 72 of the EP Act.
Table 5.3.1	<i>Notification Requirements</i>	Table 10	Reference is now made to updated conditions and tables.  "Format or form" column and "Note 2" removed as schedule 2 is now redundant and has been removed from the Licence. Licence Holder to refer to DWER website for all applicable forms.

Existing Licence condition/table/schedule	Condition Summary	Revised Licence condition/table	Conversion notes
Schedule 1: Maps	Premises Map	Figure 1. Premises Map	Premises map has been updated and premises boundary changed to pink.
Schedule 1: Maps	Map of monitoring locations and premises infrastructure	Figure 2. Map of monitoring locations and Premises infrastructure	Reference to Table 3.8.1 changed to Table 8. Infrastructure on the site map has been updated and labelled accordingly.

**Stephen Checker**

**MANAGER WASTE INDUSTRIES**

**REGULATORY SERVICES**

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





## Appendix 1: Key documents

	Document title	Availability
1	Licence L8861/2014/1 – Karratha Recycling Pty Ltd.	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
2	Amendment Notice 1 L8861/2014/1 Karratha Recycling Liquid Waste Facility – 7 February 2018	DWER records (A1612390) and accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
3	Amendment Notice 2 L8861/2014/1 Karratha Recycling Liquid Waste Facility – 18 May 2018	DWER records (A1678768) and accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
4	Amendment Notice 3 L8861/2014/1 Karratha Recycling Liquid Waste Facility – 6 September 2018	DWER records (A1718519) and accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
5	Works Approval W5538/2013/1 – Karratha Recycling Pty Ltd.	DWER records (A682577)
6	Works Approval W5806/2015/1 – Karratha Recycling Pty Ltd.	DWER records (A682577) and accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
7	DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
8	DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	
9	DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	
10	DER, February 2017. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	
11	DWER, June 2019. <i>Guideline: Decision Making</i> . Department of Water and Environmental Regulation, Perth.	
12	DWER, June 2019. <i>Guideline: Industry Regulation Guide to Licencing</i> . Department of Water and Environmental Regulation, Perth.	