Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Licence Number	L8871/2014/1
Licence Holder	SUEZ Recycling & Recovery (Perth) Pty Ltd
ACN	118 828 872
File Number:	DWER2014/002858-1
Premises	North Bannister Resource Recovery Park 6364 Albany Highway North Bannister WA 62390 Lot 2 on Plan 2767
Date of Report	31 October 2019

1. Definitions and interpretation

Definitions

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

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
Amendment Report	refers to this document
Category/ Categories/ Cat.	categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department Administering the *Environmental Protection Act 1986* Locked Bag 10 JOONDALUP DC WA 6027 info@dwer.wa.gov.au
CS Act	*Contaminated Sites Act 2003* (WA)
Delegated Officer	an officer under section 20 of the EP Act
Department	means the department established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	*Environmental Protection Act 1986* (WA)
EP Regulations	*Environmental Protection Regulations 1987* (WA)
Existing Licence	The Licence issued under Part V, Division 3 of the EP Act and in force prior to the commencement of and during this Review
Landfill Definitions	The document titled "Landfill Waste Classification and waste Definitions 1996" published by the CEO as amended from time to time.
Licence Holder	SUEZ Recycling and Recovery (Perth) Pty Ltd
Lime rate calculation tool	The Department's online lime rate calculation tool available at https://www.der.wa.gov.au/your-environment/acid-sulfate-soils/67-lime-rate-calculations-for-neutralising-acid-sulfate-soils
m^3	cubic metres
Minister	the Minister responsible for the EP Act and associated regulations
mtpa	million tonnes per annum
Occupier	has the same meaning given to that term under the EP Act.
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 *Guidance Statement: Risk Assessment*
UDR	*Environmental Protection (Unauthorised Discharges) Regulations 2004* (WA)
$\mu g/m^3$	micrograms per cubic metre
µg/L	micrograms per litre

2. Amendment Description

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

This notice is limited only to an amendment for Category 61 and the addition of 61A. No changes to the aspects of the original Licence relating to Categories 57, 62, 64 or 67A have been requested by the Licence Holder.

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *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

The North Bannister Resource Recovery Park (NBRRP) is located at Lot 2, 6364 Albany Highway, North Bannister, approximately 100 kilometres (km) south-east of Perth. The premises is currently licenced under the *Environment Protection Act 1986* (WA) (EP Act) as a Class II and Class III putrescible landfill, tyre and solid waste storage, compost manufacturing and liquid waste facility.

On 27 February 2019, IW Projects Pty Ltd, acting on behalf of SUEZ Recycling and Recovery (Perth) Pty Ltd (the Licence Holder), submitted an Application to the Department of Water and Environmental Regulation (DWER) for the amendment of existing Licence L887/1/2014/1 for the NBRRP.

On 13 June 2019 the Department issued a Request for Further Information letter to the Licence Holder requesting additional information on the proposed activities and waste streams. On 1 August 2019 the Licence provided the Department with a response to the request along with amended supporting documentation.

The amended application sought to amend the current licence in order to facilitate:

- The receipt of additional liquid waste types under the Category 61 licence;
- The addition of prescribed premises category 61A, and approval for the receipt of 50,000 tonnes of wood waste and 40,000 tonnes of Acid Sulfate Soils per annum;
- The receipt, sorting, shredding and stockpiling of untreated wood waste; and
- The receipt and treatment of Acid Sulfate Soils to meet the requirements of a Class I landfill as per the Landfill Defintions, and the use of the treated material as:
    - Landfill cover and capping material;
    - Production of manufactured soil by blending with compost; or
    - (If contaminated with asbestos) landfilling.

This amendment is limited only to an amendment for Categories 61 and 61A. No changes to the aspects of the original Licence relating to Categories 57, 62, 64 and 67A have been requested by the Licence Holder as part of this application.

This decision document and licence amendment has been informed by key documents and applicable legislation listed in **Appendix 1.**

Additional liquid waste types for use in compost manufacture and evaporation

The License Holder proposes to increase the types of liquid controlled wastes received

onsite for use in compost manufacturing, as well as those discharged to the onsite evaporation ponds.

The proposed additional liquid waste steams consist of:

- Non-toxic salts;
- Phosphorus compounds excluding mineral phosphates;
- Aqueous-based wastes from the production, formulation and use of inks, dyes, pigments, paints, lacquers and varnish;
- Industrial wash waters contaminated with a controlled waste;
- Car and truck wash waters;
- Animal effluent and residues;
- Wool scouring waste;
- Food and beverage processing waste; and
- Septage waste.

The Licence Holder has provided details on which waste streams are appropriate for each treatment method.

Untreated wood waste processing

The License Holder proposes to receive, sort and process source-separated untreated wood wastes on the Premises. The nominated throughput for this activity is 50,000 tonnes per annual period. The untreated wood waste is to consist of source-separated untreated timbers, such as unwanted furniture, pallets and packing boxes, woody debris extracted from the mixed waste on the landfill tipping area, as well as the coarse woody screenings resulting from compost processing. This activity will be undertaken on an existing soil platform area which is currently used as a materials storage and laydown area.

Untreated wood wastes presented for unloading onsite will be visually inspected for treated timbers and non-wood materials such as metals and plastics prior to unloading. Once unloaded, the wood waste will be turned with a loader or excavator and further inspected, with any further contaminants removed to waste bins for landfilling onsite. The sorted untreated wood waste will then be stockpiled in dedicated windrows prior to shredding and screening.

Shredding and screening will be undertaken by a mobile contractor once 3-5,000 tonnes of sorted wood waste has been accumulated onsite. The Licence Holder has advised that where possible, the shredder used will have mounted water sprays to reduce dust generation. In the event that the shredder used does not have this feature, then, where necessary, the input feedstock will be wet down to reduce potential dust generation. Shredding and screening machines will also incorporate magnets for ferrous metal extraction and recycling.

Processed wood waste will be stored in stockpiles approximately 20 metres long, 5 metres wide and 4 metres in height, with a minimum 5 metre wide internal access road around each stockpile. The stockpiled shredded material will then be removed from the premises within 28 days of processing. The shredded wood waste will then be onsold as product, with any surplus material used onsite as compost feedstock or disposed of via landfilling.

Neutralisation of Acid Sulfate Soils

The License Holder proposes to receive Acid Sulfate Soils (ASS) for treatment via the incorporation of alkaline materials. ASS consists of naturally occurring soil material from development and excavation activities and may comprise coarse to fine sand, loamy sands, peat, silts and clays as well as rocky material. The ASS will be handled and processed in accordance with the Department's guideline *Treatment and Management of Soil and Water in Acid Sulfhate Soil Landscapes (June 2015).* The unloading of ASS at the premises will be

subject to prior arrangement with the waste generator, including the provision of accompanying documentation outlining the acid generating potential of the soil determined in accordance with the sampling requirements of the Landfill Definitions. Sufficient quantities of alkaline material to counter the predicted acid generation of the soil potential will be received onsite prior to the receipt of ASS. The DWER Lime Rate Calculation Tool will be used to assess the quantity of neutralising material to apply, including a factor of safety of 1.5. Fine agricultural lime will be used as the primary neutralising agent.

The ASS will be stockpiled and processed on the existing lined landfill or in areas identified for future landfill development. A dedicated ASS processing pad will not be constructed, instead temporary processing pads comprising a minimum 300 millimetre thick layer of compacted, crushed limestone will be constructed prior to the receipt of ASS onsite. The size of the temporary pads will be dependent on the volume of ASS to be received, but will be constructed in a manner which directs rainfall towards the centre of the pad, and with a 150 millimetre perimeter bund to prevent runoff from the blending area to the surrounding landfill. ASS will be processed in batches, with clear distinction between all batches of material, being unprocessed material, processed but untested material and final, validated material. ASS which cannot be processed immediately will be stored on a minimum 300 millimetre thick pad of compacted, crushed limestone. The manner in which the ASS will be processes will be determined based on the quantity received. Quantities up to 1,000 cubic metres will be shaped into windrows and blended with neutralising agent using conventional earthmoving equipment. Larger volumes will be spread over the pad to a depth of 500 millimetres, and a road grader used to rip and till (fold) the soil and neutralising agent to achieve a uniform blend.

Prior to the ASS being unloaded, a minimum 100 millimetre layer of agricultural lime will be spread over the limestone pad. The ASS will then be tipped directly onto the pad and spread out using earthmoving equipment to achieve a layer approximately 500 millimetres thick. A water cart will be used to dampen the soil to and additional lime will be spread over the soil layer. The thickness of the second lime layer will be dependent on the acid generation potential of the ASS. The layered lime and soil will be ripped, blended and graded to form a homogenous mixture. Where required, the water cart will be used to dampen the blended soil to minimise dust emissions. The neutralised soil will be sampled and tested in accordance with the DWER *Treatment and Management of Soil and Water in Acid Sulfate Soil Landscapes (June 2015).* Only once the blended soil has passed the validation testing requirements set out in the DWER Landfill Definitions), when the treatment process is deemed completed and the neutralised soil removed for use on the landfill as cover or capping material, or combined with compost to produce manufactured soils.

Soil which has not been deemed to be sufficiently neutralised will be stored on the limestone pad and damped down using the water cart to minimise dust emissions. If it is identified through testing that the blended soil has not been adequately neutralised, the batch will be re-spread over the compacted limestone pad, re-blended and, if necessary, limed. The soil will then be re-tested to determine if sufficient neutralisation has been achieved. Once the ASS has been processed and fully tested, the temporary processing pad will be blended into the final batch of neutralised ASS.

In the event that a consistent supply of ASS is available for treatment, a semi-permanent compacted, crushed limestone pad will be constructed on the landfill surface or in an area of future landfill cell development. This pad will incorporate minimum 300 millimetre perimeter bunds to contain any surface water runoff and minimise erosion. The pad will be constructed with a sump (low point) from which any accumulated surface water can be pumped. This water will be used on the landfill surface for dust suppression or treated as leachate and pumped into the on-site landfill leachate management system. The stockpiling of untreated ASS will be avoided wherever possible. However, when stockpiling of untreated ASS is unavoidable, stockpiling will occur only on either the active ASS processing pad or a secondary constructed 300 millimetre thick limestone pad with perimeter bunds and leachate sump.

Table 2: Proposed design and throughput capacity changes

Category	Current [design] [throughput] capacity	Proposed [design] [throughput] capacity	Description of proposed amendment
57	1,000 tyres	1,000 tyres	No change proposed
61	16,000 tonnes per annual period	16,000 tonnes per annual period	Addition of additional approved liquid waste streams
61A	nil	90, 000 tonnes per annual period (50,000 tonnes of untreated wood waste and 40,000 tonnes of ASS)	Addition of 50,000 tonnes of wood waste per annual period Addition of 40,000 tonnes of ASS per annual period Construction of temporary crushed limestone pads to serve as a base for the blending of ASS and lime
62	14,000 tonnes per annual period	14,000 tonnes per annual period	No change proposed
64	400, 000 tonnes per annual period	400, 000 tonnes per annual period	No change proposed
67A	100, 000 tonnes per annual period	100, 000 tonnes per annual period	No change proposed

3. Other approvals

The Licence Holder has provided the following information relating to other approvals as outlined in Table 3.

Table 3: Relevant approvals

Legislation	Number	Approval
Planning and Development Act 2005 *Planning and Development (Local Planning Schemes) Regulations 2015*	Application - A1673	Granted 20 December 2017 Application: Class II and III waste disposal facility (landfill) of nine (9) cells and associated facilities and infrastructure Authority: Mid-West/ Wheatbelt Joint Development Assessment Panel Proposed expansion approved 14 June 2018

4. Amendment history

Table 4 provides the amendment history for L8871/2014/1.

Table 4: Licence amendments

Instrument	Issued	Amendment
L8871/2014/1	11 June 2015	Licence amendment to operate composting facility and receive liquid waste.
L8871/2014/1	29 April 2016	Notice of Amendment of Licence Expiry Dates - amendment for the extension of the Licence duration to 8 March 2022.
L8871/2014/1	06 May 2016	Licence amendment to allow an additional 150,000 tonnes of Class III/ putrescible waste for acceptance and burial and 10,000 tonnes biosolids for feedstock into the composting process.
L8871/2014/1	20 October 2016	Amendment to incorporate required infrastructure specifications and timeframes for landfill gas management provisions
L8871/2014/1	28 March 2017	Amendment Notice 1 – use of a tarpaulin system as an alternate daily cover material and increased tipping face dimensions
L8871/2014/1	13 June 2017	Amendment Notice 2 – construction of Leachate Pond 3 (re-named to Leachate Pond 2 as part of Amendment Notice 4)
L8871/2014/1	08 December 2017	Transfer of Licence from North Bannister Waste Facility Pty Ltd to Suez Recycling and Recovery (Perth) Pty Ltd. Amendment Notice 1 and 2 were also consolidated into the Licence as part of this amendment process.
L8871/2014/1	25 June 2018	Amendment Notice 3 – increase in feedstock volumes for composting operations with accompanied expansion in compost facility area, construction and operation of an additional leachate pond in the compost area, receipt of controlled waste in the form of leachate from the decommissioned South Cardup Landfill, and receipt and disposal of quarantine biosecurity waste.
L8871/2014/1	30 October 2018	Amendment to authorise the construction and operation of Cells 5 and 6, two leachate ponds and an increase to the volume of waste acceptance. This amendment included the consolidation of previous amendments into the parent licence.
L8871/2014/1	31 October 2019	Amendment to allow additional liquid waste acceptance and the addition of Category 61A for wood shredding and acid sulfate soil treatment.

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
Culford Agricultural Precinct Caretakers Residence	3km east of Premises boundary
Private residences – Plantation Road, Bannister	7km south-east of Premises boundary
Commercial premises - Sixty-four Mile Road, Bannister	8.9km south-east of premises boundary
Commercial premises - Shell Service Station and Three-ways Tavern	4.1km east- south-east of Premises boundary

Residential and sensitive premises	Distance from Prescribed Premises
Users of Bibbulmun Track – North Bannister Spur Trail (Transient receptor)	Directly adjacent to northern Premises boundary.
Proposed Richgro composting facility	Directly adjacent to the eastern Premises boundary. Proposed groundwater abstraction for composting process.

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	Description	Distance from Prescribed Premises
Serpentine Dam Catchment Area	Priority 2 Public Drinking Water Source Area	Within Prescribed Premises boundary. N.B. Landfill footprint situated outside Serpentine Dam Catchment Area.
Serpentine Dam Catchment Area	Priority 1 Public Drinking Water Source Area	Directly adjacent to northern Premises boundary.
Bannister River	Minor River, tributary to Hotham River	Within Prescribed Premises boundary. Non-perennial watercourse flowing south-east through the Premises. Constructed dams have been established along its course to hold water onsite. Flows to the Murray River, which discharges to Peel-Harvey Estuary.
Gringer Creek	Minor river, tributary to Bannister River	Approximately 6km to the south-east of the Premises boundary. Flows to the Bannister Rive, which ultimately discharges to the Peel-Harvey Estuary via the Murray River. Closest RAMSAR listed wetland is the Peel-Yalgorup system, located 57 km west of the Premises.
Serpentine River	Major river, discharges to Serpentine Dam.	Non-perennial tributary located adjacent to northern Premises boundary. A constructed dam has been built to retain surface water onsite. Prescribed premises is situated outside catchment area Main river channel located 3.4km north-west of prescribed premises boundary Ultimately discharges to Peel-Harvey Estuary via the Serpentine River.
Groundwater	Premises is situated atop groundwater resource area – Karri, Karri, Combined – Fractured Rock West - Alluvium	The depth to groundwater varies across the site ranging from 1.5 to 20.5 meters below ground level (mbgl) (319 to 345 mAHD). Well and borehole drilling indicates the presence of an unsaturated zone between the landfill liner and

		groundwater.
Dwellingup State Forrest - C42	Remnant native vegetation	Directly adjacent to northern and western Premises boundaries
Beelaring Class C Nature Reserve	Remnant native vegetation	Immediately to the north and west of premises boundary
Threatened fauna	Records of Chuditch (*Dasyurus geoffroii*), Forest Red-tailed Black cockatoo(*Calyptorhynchus banksia naso*), Baudins Black Cockatoo (*Calyptorhynchus baudinii*) and Carnaby's Black Cockatoo (*Calyptorhynchus latirostris)*habitat	Scattered records as close as 700m east-north-east of Premises boundary

6. Risk assessment

Table 6 below describe the Risk Events associated with the amendment consistent with the *Guidance Statement: Risk Assessments*. Both tables identify whether the emissions present a material risk to public health or the environment, requiring regulatory controls.

Table 6: Risk assessment for proposed amendments

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Cat 61 Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	Application of tankered liquid waste to greenwaste stockpiles prior to composting	Odour	Rural residence Air, wind Amenity impacts	Separation distance to nearest sensitive receptor is 3km	Minor	Unlike/y	Low	The spraying of liquid waste over greenwaste will result in odour emissions. However, DWER considers that the separation from sensitive receptors will minimise potential impacts. A review of the DWER incidents and Complaints Management System has not identified any historical odour complaints.	Condition 12 outlines operational requirements for composting processes onsite. These include requirements for maintaining aerobic conditions and temperature control within the composting process which will minimise odour generation from this process

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
	Direct discharge of bulk and packaged liquid waste to evaporation ponds	Odour	Rural residence Air, wind Amenity impacts	Separation distance to nearest sensitive receptor is 3km	Minor	Unlikely	Moderate	DWER considers that the direct discharge to ponds is unlikely to result in significant odour emissions.	Condition 12 outlines which waste types shall be disposed of via discharge to ponds. Odorous waste types to be treated via incorporation into compost manufacturing process.
	Use of controlled waste into manufacture of compost products	Offsite contamination from introduction of additional contaminant load into compost from liquid waste'	Direct application on agricultural and horticultural properties; Potential health impacts.	Testing in accordance with AS4454	Minor	Possible	Moderate	Contaminated product may result in offsite health and/or contamination impacts	Conditions 26-28 adopts the proponents control of testing and classification of product in accordance with As4454

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Cat 61A Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	Receipt and processing of untreated wood waste	Dust	Rural residence, Air, wind Health and amenity impacts, negative impacts on vegetation health	Shredders (where possible) will have mounted water sprays, alternatively, water will be used to dampen input feedstock to reduce dust generation.	N/A	N/A	N/A	Dry material has potential to release dust during initial unloading and sorting stages. DWER considers source separation and inspection of feedstock and dampening of unshredded wood waste sufficient to mitigate potential dust emissions.	Condition 12 sets out the manner in which wood waste shall be handled and processed onsite.

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
	Receipt and processing of untreated wood waste	Noise	Rural residence, fauna Air, wind Amenity impacts, disturbance	Separation distance to nearest sensitive receptor is 3km	Slight	Possible	Low	The shredding of wood waste using mobile plant and the blending of soils with a grader has the potential to generate noise emissions. DWER considers distance between Premises and potential receptors sufficient to mitigate any potential noise impacts.	Condition 12 sets out the requirements for the acceptance and handling of wood waste. Shredded and unshredded wood waste shall not be stored within 30m of premises boundary.

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
	Receipt and processing of untreated wood waste	Fire incident risk: Smoke, including particulates and air emissions released in the event of a fire.	Rural residence 3 km away Air, wind Amenity impacts, disturbance	Stockpiles shall be limited to a maximum 20 metres long, 5 metres wide and 4 metres in height, with a minimum 5 metre wide internal access road around each stockpile.	Minor	Possible	Moderate	In the event of a fire, smoke from wood waste may impact residential receptors. However impacts are expected to be minor due to the 3 km separation distance. DWER considers the applicant's proposed controls to minimise fire risk sufficient to mitigate fire and smoke emission risk.	Condition 12 outlines storage requirements to assist in the fighting and containment of fires should they occur

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
	Receipt and processing of untreated wood waste	Fire incident risk: Firefighting foam residues and wash waters in the event of a fire.	Ephemeral stream, native biota Surface runoff, groundwater Contamination, Impacts on biota	Surface water collection system, draining to leachate collection ponds	Moderate	Possible	Moderate	DWER considers existing containment infrastructure sufficient to contain contaminated wash wasters from firefighting in the event of a fire.	Conditions 20 and 21 outline requirements for onsite containment infrastructure.
	Treatment of acid sulfate soils	Dust	Rural residence, native vegetation Air, wind Health and amenity impacts, negative impacts on vegetation health	Separation distance to nearest sensitive receptor is 3km. Water will be applied to soils to minimise dust generation.	Minor	Possible	Moderate	Dry soils presented to site has potential to generate dust during unloading and blending. DWER considers proposed dust suppression measures and separation from sensitive receptors sufficient to mitigate potential impacts.	Condition 12 outlines material handling requirements to minimise potential dust emissions.

Source	Activities	Potential emissions	Potential receptors, pathway and impact	Applicant controls	Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
		Contaminated runoff	Ephemeral creek, groundwater, native biota Surface runoff, groundwater Health and amenity impacts, negative impacts on vegetation and soil health	Raised, minimum 300mm thick crushed limestone processing pads with a minimum 150mm perimeter bund. Pads shall be shaped so as to divert any runoff to a depression for pump=out and disposal to leachate ponds.	Minor	Possible	Moderate	DWER considers existing and proposed temporary processing and containment infrastructure sufficient to contain potential runoff.	Conditions 20 and 21 outline requirements for onsite containment infrastructure

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

7. Consultation

Table 9: Summary of consultation

Method	Comments received	DWER response
Application advertised on DWER website	None received	N/A
Department of Health advised of proposal (02/05/2019)	"Should the applicant intend to sell the composted material to the public (retail sale) a DOH application for 'Compost Product Approval' is required for each composted product containing human effluent waste (biosolids, sludge cake or septage). The manufacturer will need to demonstrate the product complies with quality process and relevant standards to protect public health. (https://ww2.health.wa.gov.au/Articles/A_E/Biosolids) If retail sale is not intended, it is recommended that the Department of Water and Environmental regulation licence has a condition to ensure that: • No raw septage material is directly applied to land, and • Septage material used per annum is recorded and reported in the annual environmental reports.	Process limits and specifications set out in Condition 12, precluding application of raw septage to land. Compost manufactured at Premises is not intended for retail sale. AER requirements set out in condition 36
Local Government Authority (Shire of Boddington) advised of proposal - (03/05/2019)	No response received	N/A
Applicant referred draft documents (24/10/2019)	• Amend waste acceptance Table 2.1 to allow receipt of treated as well as untreated timber • Amend Condition 5 to remove responsibility to report small spot-fires cause by landfilled household batteries. • Request alignment of reporting requirements with changes to the Waste Avoidance and Resource Recovery Regulations 2008 - Regulation 18D	• Noted. Processing of chemically treated words and potential impacts on composting processes/products will require a new assessment process. Additional timber types approved for receipt, but processing of treated timbers not permitted. • Noted. Condition amended to exclude small fires. • Reporting requirements amended.

8. Conclusion

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 10 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 10: Licence amendments

Condition No.	Proposed amendments
-	*Prescribed Premises Category 61A added*
1	*Amendment to Table 2 to include new waste types, with separate tables created for liquid and solid waste streams*
4	*New condition pertaining to fire management requirements.*
5	*New condition pertaining to notification of CEO in event of fire onsite.*
12	*Amendment to Table 5, with separate tables created for liquid and solid waste process limits and specifications.*
24	• *Table 12 amended to remove reference to requirements for bores MW07 and MW08. Correspondence confirming bore decommissioning received 28/05/2019.* • *Date set for Landfill Gas Collection Infrastructure reflecting issue date of Original Licence (previously read "12 months after this amended licence) issue date of this amended licence")*
26.	• *Table 13 amended to include reference to testing in accordance with AS 4454.*
27 & 28	• *Insertion of new conditions relating to product testing and classification in accordance with AS 4454.*
40	*New condition pertaining to the implementation and maintenance of a record keeping system for waste acceptance and rejection, and product testing and categorisation.*
Throughout licence	*Update of condition numbers and references in response to inserted conditions.*

Stephen Checker

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Date: 2019.10.31 18:23:17 +08'00'

Stephen Checker
MANAGER WASTE INDUSTRIES
REGULATORY SERVICES
An officer delegated by the CEO under section 20 of the EP Act

Appendix 1: Key documents

	Document title	Availability
1	Licence L8871/2014/1- North Bannister Resource Recovery Park	accessed at www.dwer.wa.gov.au
2	DER, July 2015. *Guidance Statement: Regulatory principles.* Department of Environment Regulation, Perth.	
3	DER, October 2015. *Guidance Statement: Setting conditions.* Department of Environment Regulation, Perth.	
4	DER, August 2016. *Guidance Statement: Licence duration.* Department of Environment Regulation, Perth.	
5	DER, February 2017. *Guidance Statement: Risk Assessments*. Department of Environment Regulation, Perth.	
6	DER, November 2019. *Guidance Statement: Decision Making*. Department of Environment Regulation, Perth.	

Appendix 2: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Report on for review and comment on 09/10/2019. The Licence Holder responded on 24 October 2019. The following comments were received on the draft Amendment Report.

Condition	Summary of Licence Holder comment	DWER response
Table 2.1	Change from 'Untreated Wood Waste' to Wood Waste. SUEZ requests a change from Untreated Wood Waste to Wood Waste. Although through our licence submission SUEZ specifically mentioned Untreated Wood Waste, we would like to be able to shred both Treated and Untreated wood waste.	Timbers treated with the following chemicals are not an appropriate feedstock for compost manufacture: • Organic Solvent Preservatives laced with common pesticides; • Creosote sealant; • Pyrethroids and other natural pesticides; • Boron based timber treatments; • Copper based timber treatments; • Older particle boards potentially containing formaldehyde; and • Methyl Bromide, Sulphuryl Fluoride, or Ethylene Oxide fumigants for pest control purposes Condition amended to permit processing of: • Medium density fiberboard; • particleboard; • dunnage; and • kiln dried/heat treated timbers.
Condition 5	Change from 'In the event of a fire' to 'In the event of a significant fire requiring third-party intervention'. The increasing presence of lithium batteries entering the market has led to increased lithium batteries entering into the general waste stream. Additionally leading towards summer we typically see an increase of boat flares enter the general waste stream. On occasion these batteries and flares have caused small spot fires which have been dealt locally and extinguished quickly without the	Condition amended so that spot fires which have been extinguished within one hour of being discovered are not required to be reported

Condition	Summary of Licence Holder comment	DWER response
	requirement for emergency response. This condition may result in constant reporting to the CEO. SUEZ requests that only those fires that require third-party intervention, such as Fire and Emergency Services, require reporting to the DWER	
Condition 40 (a) (ii)	Alignment with changes to the Waste Avoidance and Resource Recovery Regulations 2008 - Regulation 18D Licence requests that destination is recorded with examples "recycled material/recycling site/landfill etc." SUEZ proposes to record information as per the Letters issued by Mike Rowe on the 25th June 2019 for Non-Metropolitan landfills and Recycling Facilities (provided).	Condition amended to align requirements with those outlined in correspondence from CEO.