Amendment Report

Application for Licence Amendment

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

Licence Number	L8949/2016/2
Licence Holder	Bunbury Harvey Regional Council
File Number	DER2016/000056
Premises	Stanley Road Waste Management Facility 51 Stanley Road WELLESLEY WA 6233 Legal description – Lot 45 on Plan 17161 As defined by the coordinates in Schedule 4 of the licence
Date of Report	1 September 2023
Decision	Revised licence granted

Steve Checker

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Stephen Checker
A/SENIOR MANAGER, WASTE INDUSTRIES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L8949/2016/2 is held by Bunbury Harvey Regional Council (licence holder) for the Stanley Road Class II Putrescible Landfill Site (the premises), located at 51 Stanley Road, Wellesley, WA 6233.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, Revised Licence L8949/2016/2 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Amendment summary

On 30 May 2022, the licence holder submitted an application to the department to amend Licence L8949/2016/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Remove Category 13 (crushing of building material) and the associated conditions from the licence;
- Reduce the quantity of tyres accepted at the site and relocate the tyre storage area;
- The licence holder is seeking to store putrescible waste on-site in bins for up to 72 hours prior to removal offsite. The transfer station was originally designed to facilitate internal transfer of putrescible waste from the transfer station to the landfill. This waste is received at the transfer station from local residents, contains a low putrescible content and does not include waste from municipal roadside bin collections. Since landfilling operations ceased, limitations are being encountered on site due to the external transfer of putrescible waste not being possible over weekend or long weekend periods;
- Increase the throughput of household hazardous waste (HHW) from 70 tonnes to 100 tonnes per annual period;
- Increase waste oil throughput to 25,000L/25 tonnes. The department notes that the acceptance of waste oil is already approved within the licence granted on 27 June 2022 as a combined throughput of 15,000 tonnes of HHW, waste oil and putrescible waste;
- Allow for the acceptance of car batteries, electronic waste, and fridges at the premises under Category 62; and
- Add Category 61A to the licence to facilitate the processing and temporary storage of mattresses, timber and green wastes stockpiled on the site. Bunbury Harvey Regional Council has advised that it is committed to reducing these stockpiles as soon as practicable, but require up to 15 months of temporary storage in the interim. This includes constructing a dedicated green waste storage and processing area. The current status of the green waste, timber waste and mattress stockpiles are detailed within Section 3.1.

The amendment is limited only to changes to transfer station activities with the exception of a timeframe for the connection of aspiration wells to the active LFG management systems within 90 days of the wells being constructed. The licence holder is seeking to allow for the aspiration wells to be connected to the LFG management system after capping works are completed. This change to the connection of the aspiration wells will not alter the risk assessment previously undertaken for this activity and will be amended within the licence amendment.

The premises relates to the categories and assessed design capacity under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in licence L8949/2016/2 and Table 1 below. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with Guideline: Risk Assessments (DWER 2020) are outlined in licence L8949/2016/2.

Table 1: Prescribed premises categories

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	**Assessed design capacity**
Category 13 - Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned.	25,000 tonnes per annual period
Category 57 – Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	8,000 tyres per annual period
Category 62 – Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	35,000 tonnes per annual period
Category 64 – Class II or III putrescible landfill site: premises on which waste (as determined by reference to the waste type set out in the document entitled “Landfill Waste Classification and Waste Definitions 1996” published by the Chief Executive Officer and as amended from time to time) is accepted for burial.	100,000 tonnes per annual period

3. Overview of premises

3.1 Operations summary

The Stanley Road Waste Management Facility (WMF) (the premises) provides waste management services to the City of Bunbury, the Shire of Harvey and commercial waste operators. Activities at the site include a community drop off facility/transfer station and a refund point for the container deposit scheme. The site has historically operated as a Class II putrescible landfill.

On 1 April 2022 Bunbury Harvey Regional Council notified the department that landfilling at the premises ceased on 25 March 2022. Landfilling ceased due to final landforms being achieved. Bunbury Harvey Regional Council continues to collect municipal solid waste from residents, however the waste is taken directly to another licenced facility for burial. The current site is shown in Figure 1 below.

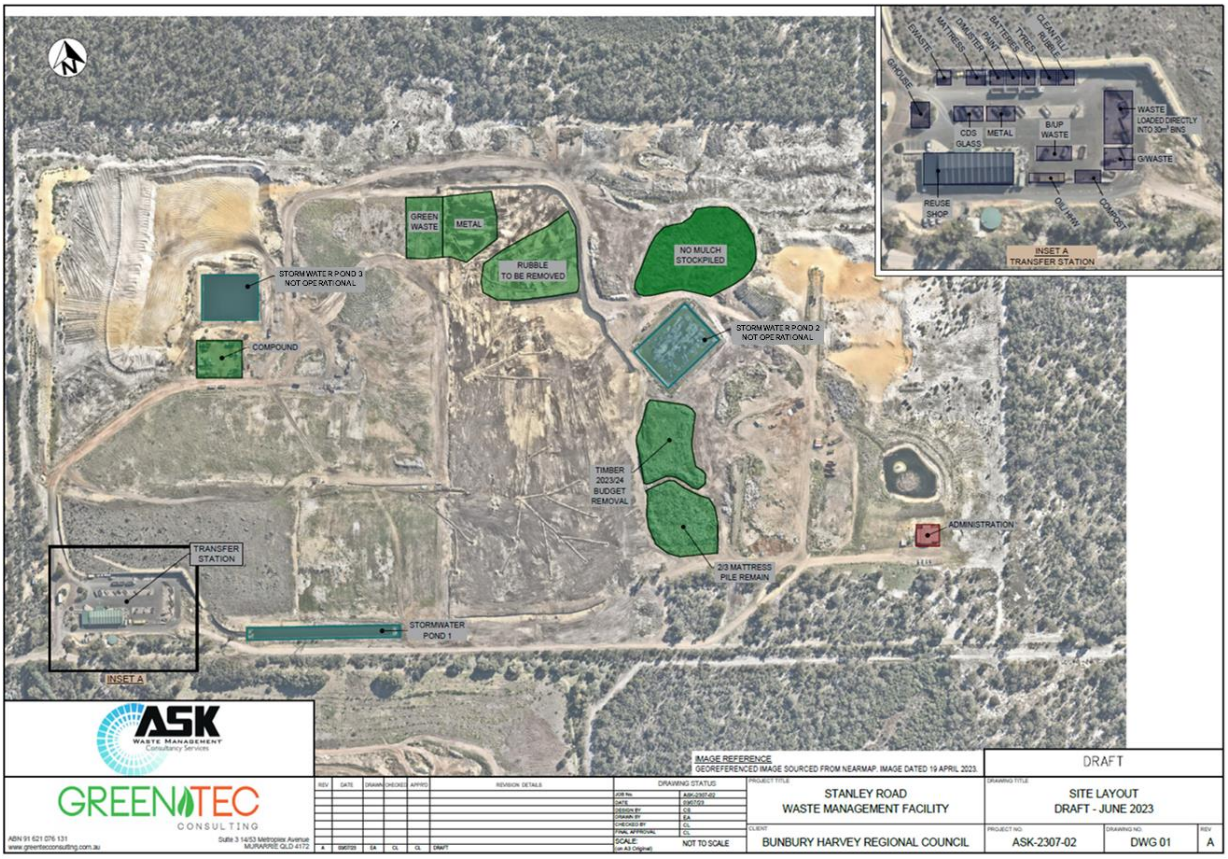

Figure 1: Site layout

The Stanley Road WMF transfer station contains a drop-off facility/transfer station for local residents to bring self-hauled recyclables, items for the re-use shop, and drop-off of household hazardous waste, used oil, green waste and residual waste. The transfer station also contains a Container Deposit Scheme (CDS) aggregation point where local residents bring eligible cans and bottles to collect their refund.

The transfer station is located on a concrete hardstand area that includes stormwater management infrastructure. The stormwater management infrastructure diverts all stormwater and leachate generated within the transfer station to a lined stormwater pond.

Historically, green waste, timber waste and mattresses received at the transfer station were transferred to the east of the landfill cells for stockpiling, prior to processing, landfilling or removal from site. The current status of the stockpiles are detailed below:

- The licence holder has stated that green waste has been stockpiled onsite for several years and periodically mulched with the intention of using it for onsite rehabilitation purposes. There is approximately 20,000m^3 of green waste and mulch currently stockpiled. It is estimated that most of this material will be required as mulch for the capped landfill cells over the next twelve months. The licence holder has proposed to mulch the remaining green waste on a campaign basis and store the mulch and remaining green waste stockpiles on the dedicated hardstand storage area within nine months.

- The current stockpiles of timber waste stored to the east of the landfill has been estimated by the licence holder as being approximately 20,000m^3. The timber stockpiles were sampled on 16 February 2022 by Cardno (WA) Pty Ltd (Cardno) to classify the material for the purpose of disposal to a licence Waste Management Facility. The Technical Memorandum (Cardno, 2022) found that based on field observation, laboratory analysis and statistical analysis, the following waste classification has been drawn:
    - Stockpiles 9 and 10 (as referred to in the technical memorandum) are considered suitable for disposal at a Class III landfill facility; and
    - Stockpile 12 (as referred to in the technical memorandum) is considered suitable for disposal at a Class I/II landfill facility.

  The licence holder is proposing to store the timber waste on site in an unlined area of the premises until such time that the waste can be disposed of to the new lined cell (Cell 2/3) once constructed and approved for operation. The Delegated Officer notes that Cells 2 and 3 are approved to be constructed with an engineered lining and leachate containment system and that to date, the construction of the lined cells has not been commenced.
- The current mattress stockpile stored to the east of the landfill has been estimated by the licence holder to be in the order of 11,500m^3 or approximately 15,000 mattresses. The licence holder is proposing to store mattresses onsite in an unlined area of the premises until such time that the mattresses can be transferred offsite to an appropriate licenced premises. The licence holder has proposed to process the mattresses into discrete stockpiles that are 50m long x 10m wide x 5m high. Due to the significant quantities requiring relocation the licence holder estimates it will take six months to complete the stockpile restructuring process.

  The licence holder is proposing to have the existing mattress stockpile completely disposed of by the end of the 2023/2024 financial year, with no more mattresses to be added to the stockpile. Going forward, mattresses will be stored at the transfer station and be periodically collected for recycling. No more than 100 mattresses will be stored at the transfer station at any one time.

Figure 2 provides an overview of the layout of the transfer station.

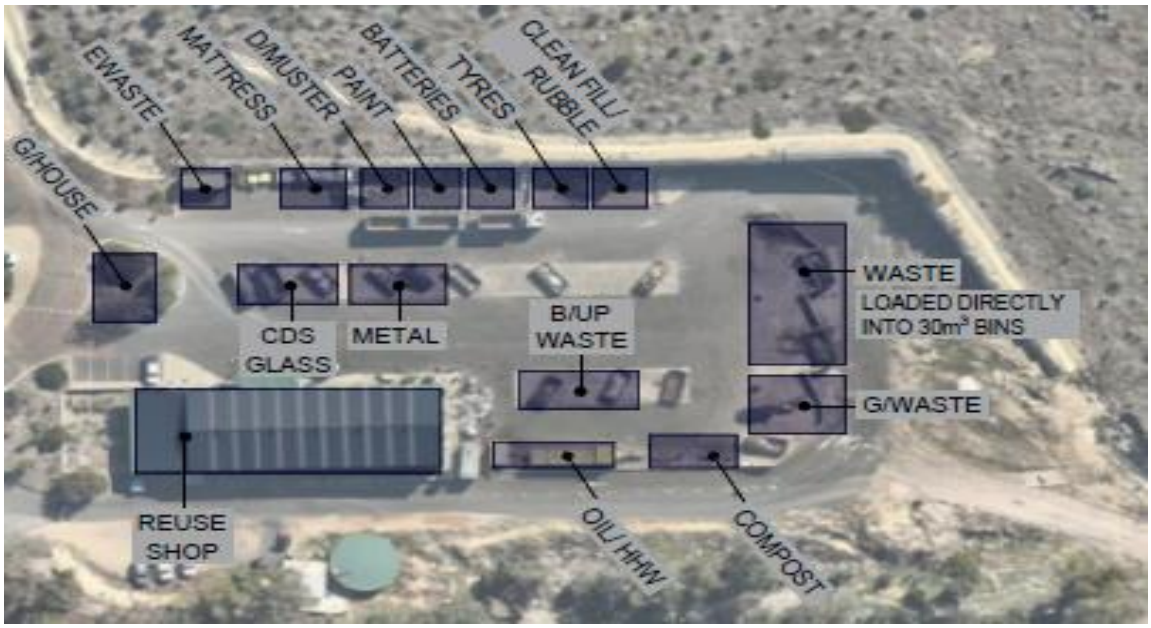

Figure 2: Layout of the transfer station

3.2 Compliance - Environmental Protection Act 1986

3.2.1 Section 65 – Environmental Protection Notice EPN202102

On 5 July 2021, an Environmental Protection Notice (EPN) was given to Bunbury Harvey Regional Council to require BHRC to control or abate emissions of leachate from the unlined landfill cells into groundwater.

The intention of the EPN was to enforce the closure and capping of the unlined cells at the Stanley Road WMF. The EPN allowed only certain types of inert and low-risk waste to continue to be accepted into the unlined landfill to enable BHRC to continue to deliver essential municipal waste services to the local region.

On 3 September 2021 an inspection undertaken by the departments Compliance and Enforcement Branch identified that the licence holder was non-compliant with the requirements of the EPN.

3.2.2 Compliance against licence conditions

The department's published Guidance Statement: Risk Assessments (December 2020) states that operator history is a relevant consideration in establishing risk context and in determining risk likelihood criteria.

Operator history has been considered in the assessment of this amendment application. Information from compliance inspections and the content of Annual Audit Compliance Reports (AACR) and Annual Environmental Reports (AER) have been considered in the assessment of this application.

On 3 September 2021 an inspection undertaken by the department's Compliance and Enforcement Branch identified that the licence holder was non-compliant with 46 licence conditions and verification was required for a further 26 conditions. Details of the breaches are detailed in the licence renewal decision document granted on 27 June 2022.

On 15 March 2022 an inspection undertaken by the department's Compliance and Enforcement Branch identified that the licence holder was non-compliant with a further 4 licence conditions in addition to those identified on 3 September 2021. The non-compliances included:

- Required construction compliance documents following the construction of the used tyre hardstand has not been provided to the DWER;
- Hazardous Liquid Waste (paint and resins) not stored in accordance with the licence requirements;
- Cover was not applied and maintained on landfilled waste in accordance with licence conditions; and
- Unprocessed waste and processed waste not separated at a minimum 3m distance.

3.3 Contaminated Sites Act 2003

The lots occupied by the Stanley Road WMF were classified under the *Contaminated Sites Act 2003* (CS Act) as *contaminated – remediation required* on 15 September 2021.

The site was first classified as *possibly contaminated – investigation required* under the CS Act, based on information submitted to the department up to May 2007, since that time the site has been reclassified a number of times to reflect additional information submitted to the department up to August 2021.

The September 2021 classification requires that further groundwater, surface water, sediment and landfill gas investigations be carried out. The investigations are required to be reported in a Stage 2 Detailed Site Investigation (Stage 2 DSI).

Contamination present beneath the Stanley Road WMF has been identified beyond the site boundary onto adjacent land to the west and south-west. Parcels of land to the west of the landfill, including the neighboring sand mine and adjacent road reserves, are being regulated under the CS Act as 'affected sites'. Under the CS Act, the party responsible for remediation of a source site is also responsible for remediation of any affected sites. As the Stanley Road WMF is considered a 'source site', in accordance with regulation 31(1)(b) of the *Contaminated Sites Regulations 2006* the Stage 2 DSI is also required to be accompanied by a mandatory auditor's report (MAR). A detailed summary of the historical contamination status of the premises is detailed in the licence renewal decision document granted on 27 June 2022 which can be found on the department's website.

A Stage 2 DSI was completed by the Licence Holder's consultant in April 2022 with the MAR and reports received by the department on 31 May 2023. Following review of the reports and MAR, DWER acknowledge that investigations to date have been appropriately targeted and provide a comprehensive assessment. However, the department considers that the available information is not sufficient to conclude that the risk profile as characterised through the CSM is *'unlikely to change to the extent that risks may increase'*. The stability of the groundwater plume has not been assessed and the department consider that areas of remaining uncertainty include:

- long term trends of contaminant concentrations in bores installed to the west of Forrest Highway, some of which have only been sampled in two monitoring events
- current and future management practices at the source site, including future surface run-off and infiltration regimes during and post-capping of the unlined cell, and
- while available evidence indicates that the Brunswick River has not been impacted, whether or not there is a complete groundwater pathway for leachate transport to the river has not been confirmed or discounted.

The contaminated site classification was updated on 27 June 2023 to reflect the new information and to update the reasons for classification. The overall classification, *contaminated – remediation required remains unchanged.*

3.4 Other relevant matters

There have been five self-reported fires at the premises since 2017. The most recent fire was reported on 30 December 2022 within a green waste stockpile towards the east of the premise. The fire burnt approximately 2 tonnes of mulched green waste with the estimated area impacted by the fire and firewater to be 100 square metres. The cause of the fire was determined to be self-combustion within the stockpile. The volume of mulched green waste remaining at the premises was estimated to be approximately 10,000 tonnes. The licence holder was not authorised to store green waste at the premises, for more than 24 hours, at the time of the fire occurring.

Delegated officer summary:

- The Delegated Officer considers that the number and nature of non-compliances associated with the premises brings into question Bunbury Harvey Regional Council's ability to implement controls effectively, through the management of operations at the site. Non-compliances related to waste acceptance and non-adherence to previously determined timeframes have been considered in the assessment of risks to the environment and public health.
- Operator compliance history in relation to implementation of proposed controls and licence controls has also been factored into the department's assessment of risk in line with Guidance Statement: Risk Assessment (December 2020).
- Self-combustion has occurred at the premises within the green waste stockpile. The ongoing risk to the environment and human health from self-combustion and fire events will be considered as part of the risk assessment.

4. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

4.1 Source-pathways and receptors

4.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence holder controls

Emission	Sources	Potential pathways	Proposed controls
Receipt and storage of putrescible waste			
Dust	Unloading and loading of waste. Movement of vehicles and operation of machinery.	Air / windborne pathway	Speed limited at the site as per current arrangements (<8 km/h). Receipt of putrescible waste directly in to 30m^3 skip bin. Covering of skip bin for transport.
Odour	Unloading and loading of waste Decomposition of putrescible waste Storage of putrescible waste for up to	Air / windborne pathway	Putrescible waste to be stored at Transfer Station Area for no longer than 72 hours. Covering of skip bin for transport.

Emission	Sources	Potential pathways	Proposed controls
	72hrs.		
Contamination of stormwater	Spills of residual liquids.	Overland flow	Install earthen bunds around stockpile and processing area to contain dirty stormwater and prevent clean stormwater from entering the area. Covering of skip bins with tarpaulin once loaded for transport.
Windblown waste	Unloading and loading of waste. Temporary storage of waste	Air / windborne pathway	Receipt of putrescible waste directly in to 30m^3 skip bin. Covering of skip bins for transport. Putrescible waste to be stored for no longer than 72 hours.
Vectors	Unloading and loading of waste. Temporary storage of waste	Direct impact	Putrescible waste to be stored at Transfer Station Loading Area for no longer than 72 hours.
Fire/smoke	Upset conditions	Air / windborne pathway	Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER.
Receipt and storage of hazardous wastes and waste oils			
Contamination of stormwater	Extinguishing of fires Stormwater coming into contact with waste Overtopping Spills	Infiltration through soil profile	Environmentally hazardous materials to be stored in accordance with the Code of Practice for the Storage of dangerous goods. Hazardous materials stored on sealed hardstand. Stormwater directed from hardstand to lined stormwater retention pond. Use of bunded containers, or pallet bunds, for the storage of HHW, waste oil, lead acid batteries. Oil and chemical spill kits stored onsite.
Fire - particulates and noxious gases (smoke)	Combustion of hazardous wastes and waste oils	Air/windborne pathway	Fire extinguishers and fire blankets located at Transfer Station Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER. Environmentally hazardous materials to be stored in accordance with the Code of Practice for the Storage of

Emission	Sources	Potential pathways	Proposed controls
			dangerous goods. Storage of batteries in accordance with Australian Battery Recycling Initiative (ABRI) best practice guidelines.
Receipt and storage of e-waste			
Contamination of stormwater	Stormwater coming into contact with waste	Infiltration through soil profile	Electronic waste to be stored in skip bin or cages and covered with tarpaulin to prevent rainfall ingress.
Fire/smoke	Upset conditions	Air / windborne pathway	Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER.
Contaminated fire water Contamination of stormwater	Extinguishing of fire	Infiltration through soil profile	Fire extinguishers and fire blankets located at Transfer Station Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER. Stormwater directed from hardstand to lined stormwater retention pond.
Receipt and storage of whitegoods			
Refrigerant leaks	Fridges and freezers received and stored at the Transfer Station.	Air/windborne pathway	Fridges and freezers stored at Transfer Station on sealed hardstand until refrigerant and power cords removed. Refrigerant to be recovered in accordance with the Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 by an operator that holds a restricted Refrigerant Recovery licence. Fridges and freezers only to be transferred to scrap metal stockpile once refrigerant has been recovered and power cords removed.
Storage of tyres			
Fire - particulates and noxious gases (smoke)	Combustion of tyres	Air/windborne pathway	Only 350 tyres to be stored onsite at any one time. Tyres to only be stored in skip bin at Transfer Station to reduce fire risk.

Emission	Sources	Potential pathways	Proposed controls
Stormwater contamination from contaminated fire water	Extinguishing of fires Stormwater coming into contact with waste	Overland flow, seepage, and groundwater flow	Tyre skip bin to be located on the Transfer Station's asphalt hardstand so that any fire water is contained within the lined stormwater pond.
Disease vectors and vermin	Habitation and breeding of insects and vermin within used tyres.	Air and land via insects, birds and rodents	Only 350 tyres to be stored onsite at any one time; this will ensure that the tyre skip bin is removed from site for recycling at least monthly minimising opportunities for vermin breeding.
Receipt and storage of mattresses			
Fire - particulates and noxious gases (smoke)	Combustion of tyres	Air/windborne pathway	Only 100 mattresses to be stored onsite at any one time. Mattress storage location to be located on the Transfer Station's asphalt hardstand. Mattresses will be stored in stockpiles, contain no greater than 10 mattresses per stockpile. Mattresses will be collected for transport offsite fortnightly.
Stormwater contamination from contaminated fire water	Extinguishing of fires Stormwater coming into contact with waste	Overland flow, seepage, and groundwater flow	Mattress storage location to be located on the Transfer Station's asphalt hardstand so that any fire water is contained within the lined stormwater pond.
Shredding and storage of green waste			
Dust	Movement of vehicles and operation of machinery, including shredder.	Air / windborne pathway	Speed limited at the site as per current arrangements (<8 km/h). Watering down of trafficked areas. User water sprayer with shredder if dust emission from the premises is observed.
Noise	Unloading and loading of waste. Movement of vehicles and operation of machinery.	Air / windborne pathway	Speed limited at the site as per current arrangements (<8 km/h). Operations only to occur during normal business hours (7am – 5pm).
Odour	Decomposition of putrescible waste	Air / windborne pathway	None proposed

Emission	Sources	Potential pathways	Proposed controls
Leachate	Waste acceptance, processing and storage	Overland flow, seepage, and groundwater flow	300mm thick compacted and bunded limestone hardstand for storage and processing of green waste. No food organics or animal wastes to be stockpiled or processed.
Contamination of stormwater	Stormwater coming into contact with waste	Overland flow, seepage, and groundwater flow	300mm thick compacted and bunded limestone hardstand for storage and processing of green waste. Install earthen bunds around stockpile and processing area to contain dirty stormwater, and prevent clean stormwater from entering the area.
Disease vectors and vermin	Habitation and breeding of insects and vermin within stockpiles.	Pathogenic organisms	Regular inspection of stockpiles for evidence of vermin or disease vectors. Eradication treatment as required.
Noxious weeds	Spread of noxious or invasive weed species from stockpiles to surrounding ecosystems.	Direct impact	Regular inspection of stockpiles and surrounding area for weeds, and undertake eradication if required.
Fire/smoke	Upset conditions – compost windrow or waste stockpile fire Fire water.	Air / windborne pathway	Install earthen bunds around stockpile and processing area to contain fire waters. Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER. Stockpiles to meet following specifications: • Maximum 50 metres long • Maximum 10 metres wide • Maximum 5 metres high • Minimum of 6 metres between and around stockpiles.

Emission	Sources	Potential pathways	Proposed controls
Processing and storage of timber			
Leachate	Rainwater passing through stockpiles and potentially leaching hazardous compounds from treated timbers.	Overland flow, seepage, and groundwater flow	Timber stockpiles will be sampled and analysed to determine what classes of landfill they can legally be disposed at. If results indicate that a timber stockpile exceeds Class 3 acceptance criteria it will be removed from site for disposal at an appropriately licenced facility. • Stockpiles that meet acceptance criteria for Class 2 and 3 landfills will be stored onsite until the lined landfill cell is completed and approved for operation. • If timber is identified by staff to potentially contain CCA, HTC, or PEC during the shredding operations, it will be placed in a dedicated skip bin to be removed from the site for disposal at an appropriately licenced facility once full. Suspected CCA timbers will be chemically tested to ensure accurate identification of CCA. • Timber only processed with slow speed shredder to avoid the creation of fine particles more susceptible to leaching.
Dust	Movement of vehicles and operation of machinery, including shredder.	Air / windborne pathway	Use water cart to provide dust suppression on access roads if required. User water sprayer with shredder if dust emission from the premises is observed.
Noise	Movement of vehicles and operation of machinery, including shredder.	Movement of vehicles and operation of machinery, including shredder.	Operations only to occur during normal business hours (7am – 5pm).
Fire/smoke	Upset conditions – windrow or waste stockpile fire	Air / windborne pathway	Install earthen bunds around stockpile and processing area to contain fire waters. Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER.

Emission	Sources	Potential pathways	Proposed controls
			Stockpiles to meet following specifications: • Maximum 50 metres long • Maximum 10 metres wide • Maximum 5 metres high • Minimum of 6 metres between and around stockpiles.
Contaminated stormwater	Stormwater contacting waste materials. Fire water	Overland flow, seepage, and groundwater flow	Install earthen bunds around stockpile and processing area to contain dirty stormwater, and prevent clean stormwater from entering the area. Install earthen bunds around stockpile and processing area to contain fire waters.
Windblown waste	Windblown emission of litter during shredding operations.	Air / windborne pathway	Maintain portable litter fences around processing area. Covering of skip bins containing shredded timber with tarpaulin when shredder is not operating.
Disease vectors and vermin	Habitation and breeding of insects and vermin within stockpiles.	Pathogenic organisms	Regular inspection of stockpiles for evidence of vermin or disease vectors. Eradication treatment as required.
Processing and storage of mattresses			
Noise	Movement of vehicles and operation of machinery.	Air / windborne pathway	Operations only to occur during normal business hours (7am – 5pm).
Smoke	Upset conditions – waste stockpile fire	Air / windborne pathway	Produce a Fire Management Plan within 6 months of amendment approval and submit to DWER. Stockpiles to meet following specifications: • Maximum 50 metres long • Maximum 10 metres wide • Maximum 5 metres high • Minimum of 6 metres between and around stockpiles.
Fire water	Upset conditions	Overland flow,	Install earthen bunds around

Emission	Sources	Potential pathways	Proposed controls
Contaminated stormwater	– compost windrow or waste stockpile fire Fire water.	seepage, and groundwater flow	stockpile to contain fire waters. Install earthen bunds around stockpile area to contain dirty stormwater, and prevent clean stormwater from entering the area.
Disease vectors and vermin	Habitation and breeding of insects and vermin within used tyres.	Air and land via insects, birds and rodents	Regular inspection of stockpiles for evidence of vermin or disease vectors. Eradication treatment as required.

4.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the Delegated Officer has excluded employees, visitors and contractors of the licence holder's from its assessment. Protection of these parties often involves different exposure risks and prevention strategies, and is provided for under other state legislation.

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental siting* (DWER 2020)).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from premises boundary**
Residential premises (sensitive)	Approximately 535 m west southwest from the western side of the premises boundary Approximately 900 m east from the eastern side of the premises boundary.
Semi-rural / agricultural premises (sensitive)	Approximately 325 m south-east from the south-eastern corner of the premises boundary. Approximately 550 m south of the southern premises boundary.
Industrial premises	Directly adjacent to the west and south.
Environmental receptors	**Distance from premises boundary**
Rights in Water and Irrigation Act 1914 Proclaimed Groundwater Area	The premises is within the Bunbury Groundwater Area.
Beneficial users of groundwater – • predominantly non potable[1] • potential drinking water use in semi-rural dwellings to the south • agricultural irrigation • stock watering • industrial uses	19 privately owned bores are located within 1 km of the site boundary (DWER GIS – WIN Groundwater Sites) The closest bore is located 690 m southwest of the eastern site boundary. One bore located at Sand Mine immediately west of the western site boundary, 210 m from the western site boundary. One bore located at an Inert landfill 115 m south of the southern site boundary (DWER Water Register)
Rights in Water and Irrigation Act 1914 Proclaimed Surface Water Area -	Brunswick River and Tributaries – 220 m south

Rivers and Tributaries	Wellesley River 130 m southeast of the southern site boundary Brunswick River 430 m south of the southern site boundary. Collie River 5.5 km southwest of the southern site boundary
Leschenault Inlet	Leschenault Inlet Management Area 151 m south and 1.9 km west.
Wetlands	Conservation category geomorphic wetlands within premises boundary (northern portion), 100 m north (Dampland), 80 m south (Dampland) and 950 m east (Flood plain) of active landfill area. Multiple Use management category geomorphic wetlands east of the premises extending approximately 25 m inside the premises boundary.
Department of Biodiversity Conservation and Attractions Legislated Land, conservation of flora and fauna and or historical features.	Land reserved under section 5(1)(h) of the *Conservation and Land Management Act 1984* directly north.
Threatened Ecological Community (Banksia Dominated Woodland of the Swan Coastal Plain)	Within and surrounding the premises.

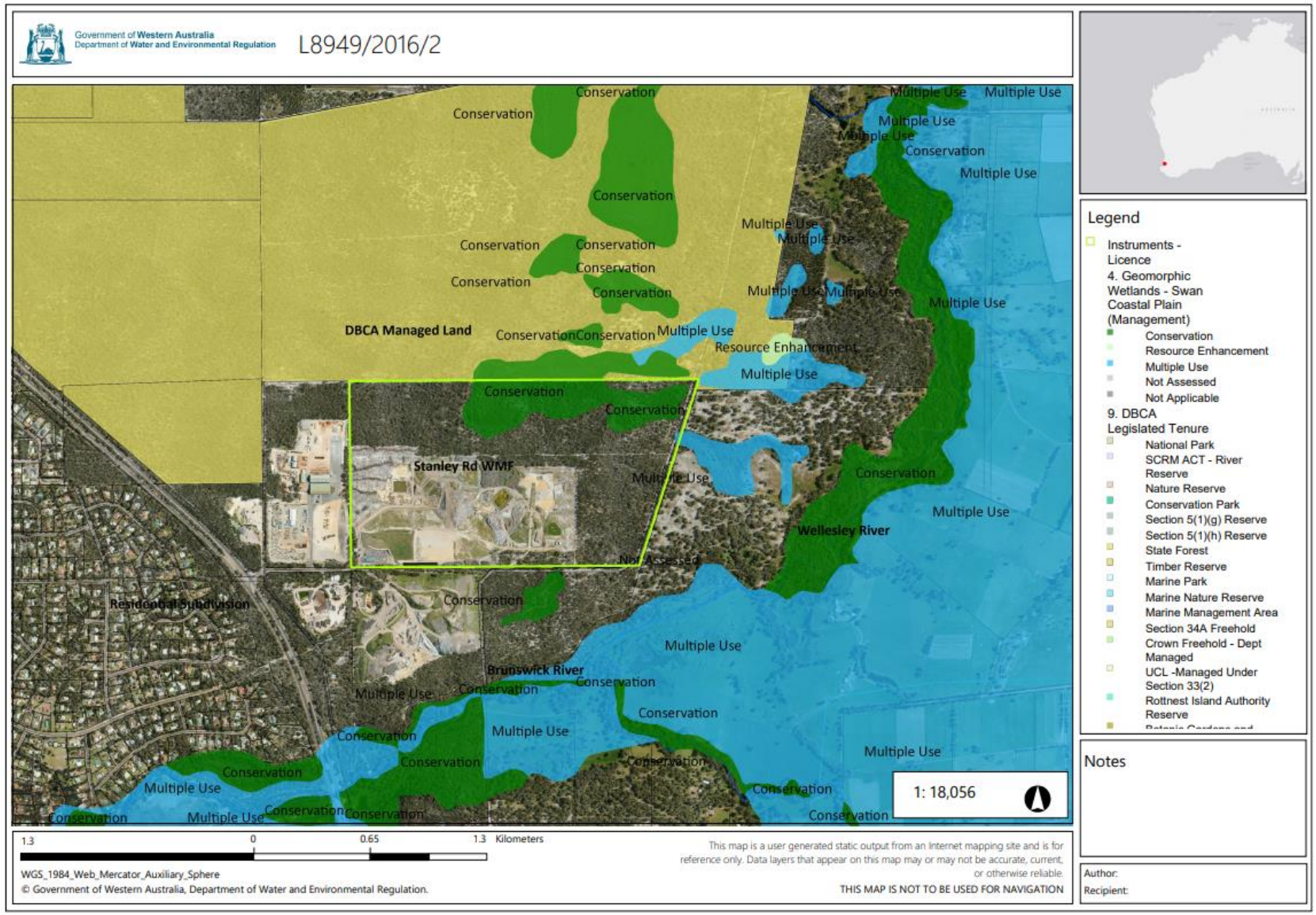

Figure 3: Distance to sensitive receptors

4.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 4.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the licence holder has proposed mitigation measures/controls (as detailed in Section 4.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the licence holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the licence holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The Revised Licence L8949/2016/ that accompanies this Amendment Report authorises emissions associated with the operation of the transfer station and waste storage activities.

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

Table 4. Risk assessment of potential emissions and discharges from the Premises operation

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Receipt and storage of putrescible waste								
Receipt and storage of putrescible waste for up to 72 hours.	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	N/A	N/A
	Odour			Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 26-30	The Delegated Officer considers the nature of the waste material is not likely to generate large amounts of odour. On this basis the Delegated Officer considers that the Applicant's proposed odour mitigation controls are likely to be sufficient at mitigating odour emissions.
	Noise			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	Given the low risk no regulatory controls are required. Further management of noise is provided by the *Environmental Protection (Noise) Regulations 1997*.
	Smoke/fire			Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	N	Conditions 5-8, 16, 26-30 **<u>Condition 17</u>**	Due to the risk of fire/smoke, additional regulatory controls will be added to the licence. The Applicant will be required to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 13, 16, 26-30 **<u>Condition 17</u>**	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating leachate, fire water and contaminated stormwater emissions.
	Windblown waste	Air/wind dispersion of waste causing visual amenity and nuisance impacts	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8, 11	Existing conditions within the licence in addition to the applicant's proposed controls are likely to be sufficient at mitigating windblown waste emissions.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Vectors	Direct impact causing nuisance and impacting on human health.	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the Premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8, 10	N/A
Receipt and storage of hazardous wastes, waste oils and e-waste								
Receipt and storage of hazardous wastes, waste oils and e-waste Fire/Smoke emissions arising from upset conditions. Mixing of incompatible waste types causing fire	Dust	Air / windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	N/A	N/A
	Smoke/fire			Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 26-30 **<u>Condition 17</u>**	Due to the risk of fire/smoke, additional regulatory controls will be added to the licence. The Applicant will be required to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
	Odour			Refer to Section 4.1.1	C = Slight L = Unlikely **Low Risk**	Y	N/A	N/A
	Leachate Spills Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 5-8, 13, 16, 26-30 **<u>Condition 17</u>**	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating leachate, spills, fire water and contaminated stormwater emissions.
Receipt and Storage of used tyres								
Receipt and Storage of used tyres	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 26-30	Due to the additional risk of fire/smoke at the premises, regulatory controls will be added to the licence requiring the Applicant to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
	Contaminated fire water Contaminated stormwater	Infiltration through soil profile causing contamination of groundwater	Wetlands to the north, east and south east. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 13, 16, 26-30 **<u>Condition 17</u>**	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating fire water and contaminated stormwater emissions.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Receipt and storage of whitegoods								
Receipt and storage of whitegoods	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 26-30	Due to the risk of fire/smoke, additional regulatory controls will be added to the licence. The Applicant will be required to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
	Leachate Contaminated fire water Contaminated stormwater	Infiltration through soil profile causing contamination of groundwater Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and south east. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 13, 16, 26-30 **Condition 17**	The risk assessment for the receipt and storage of scrap metal has not changed due to the inclusion of whitegoods.
	Release of ozone depleting substances and synthetic greenhouse gases	Air/windborne pathway causing impacts to health and increase greenhouse gasses.	Environment and atmosphere.	Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 5-8, 26-30	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating the potential release of ozone depleting substances and synthetic greenhouse gases.
Receipt, shredding and storage of green waste received via the transfer station								
Receipt, shredding and storage of green waste received via the transfer station	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating the potential dust impacts form the shredding and storage of green waste.
	Odour	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Unlikely **Low Risk**	Y	Conditions 5-8, 26-30 **Condition 33**	The Delegated Officer considers the nature of the waste material is not likely to generate large amounts of odour. Given the distance to receptors from the proposed green waste processing and storage hardstand, the Delegated Officer considers that the Applicant's proposed odour mitigation controls are likely to be sufficient at mitigating odour emissions.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Noise			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	Given the low risk no regulatory controls are required. Further management of noise is provided by the *Environmental Protection (Noise) Regulations 1997*.
	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 5-8, 13, 16, 26-30 **Condition 17**	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating leachate, fire water and contaminated stormwater emissions
	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 26-30 **Condition 33**	Due to the risk of fire/smoke, additional regulatory controls will be added to the licence. The Applicant will be required to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
Storage and shredding of green waste stockpiles								
Storage of and shredding of green waste to the north and east of the premises	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating the potential dust impacts form the shredding and storage of green waste.
	Odour			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8, 26-30	The Delegated Officer considers the nature of the waste material is not likely to generate large amounts of odour. Given the distance to receptors from the proposed green waste processing and storage hardstand, the Delegated Officer considers that the Applicant's proposed odour mitigation controls are likely to be sufficient at mitigating odour emissions.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Noise			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	Given the low risk no regulatory controls are required. Further management of noise is provided by the *Environmental Protection (Noise) Regulations 1997*.
	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Major L = Possible **High Risk**	N	Conditions 5-8, 16, 26-30 **Condition 17, 24**	Given the increased risk of fire at the premises, the Delegated Officer considers that additional regulatory controls will be added to the licence. These controls included acceptance and processing requirements, storage requirements, monitoring and reporting requirements, maintaining a low fuel load buffer zone surrounding the green waste storage area, and the implementation of a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	N	Conditions 5-8, 16, 33-39 **Condition 17, 33**	In addition to controls proposed by the applicant, the Delegated Officer considers that additional regulatory controls will be added to the licence. These controls included acceptance and processing requirements, storage requirements, monitoring and reporting requirements to prevent a fire occurring, and the implementation of a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
Receipt and storage of mattresses via transfer station								
Receipt and storage of mattresses via transfer station	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Unlikely **Low Risk**	Y	N/A	N/A
	Noise			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	Given the low risk no regulatory controls are required. Further management of noise is provided by the *Environmental Protection (Noise) Regulations 1997*.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Conditions 5-8, 13, 16, 34-39 **Condition 17**	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating leachate, fire water and contaminated stormwater emissions from the receipt and storage of mattresses via the transfer station.
	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	C = Moderate L = Possible **Medium Risk**	Y	Conditions 5-8, 16, 33-39	Due to the risk of fire/smoke, additional regulatory controls will be added to the licence. The Applicant will be required to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745.
Storage of mattress stockpiles to the east of the premises								
Storage of mattress stockpiles to the east of the premises	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	Refer to detailed risk assessment in Section 4.4			
	Smoke/fire	Air/windborne pathway causing impacts to health and amenity Fire emission	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	Refer to detailed risk assessment in Section 4.3			
Storage and shredding of timber waste								
Storage and shredding of timber waste	Dust	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south.	Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	The Delegated Officer considers that the Applicant's proposed controls are likely to be sufficient at mitigating the potential dust impacts form the shredding and storage of timber waste
	Odour			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	N/A	N/A

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions [2] of licence	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Noise			Refer to Section 4.1.1	C = Slight L = Possible **Low Risk**	Y	Conditions 5-8	Given the low risk no regulatory controls are required. Further management of noise is provided by the *Environmental Protection (Noise) Regulations 1997*.
	Smoke/fire	Air/windborne pathway causing impacts to health and amenity	Closest residential receptor located ~535 m west southwest from the western side of the premises boundary. Closest semi-rural/agricultural premises located ~325 m southeast from the south-eastern corner of the premises boundary. Industrial premises located to the immediate west and south. Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Threatened Ecological Community within and surrounding the premises.	Refer to Section 4.1.1	Refer to detailed risk assessment in Section 4.3			
	Leachate Contaminated fire water Contaminated stormwater	Overland flow impacting upon the ecosystem function of sensitive waterways Overland flow impacting upon the health and ecosystem function of flora communities Infiltration through soil profile to groundwater causing potential impacts on human health and ecological values of wetlands and waterways, and beneficial uses associated with quality of water in the aquifer	Wetlands to the north, east and southeast. Closest being a conservation category wetland located ~100 m north of the unlined landfill cells. Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively. ~19 privately owned groundwater bores located within 1 km of the premises. Threatened Ecological Community within and surrounding the premises	Refer to Section 4.1.1	Refer to detailed risk assessment in Section 4.4			

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed licence holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

4.3 Detailed risk assessment for smoke and leachate emissions from fire within timber and mattress stockpiles

4.3.1 Hazard characterisation and impact

Normal operations are unlikely to cause fire and smoke emissions. Storage of timber waste and mattresses at the premises provides a fuel source for a potential fire. The Delegated Officer considers the receptor most likely to be at risk from smoke/fire emissions to be:

- Residential receptors located ~500 m from the premises;
- Industrial premises located to the immediate west and south;
- Wetlands to the north, east and southeast, including the conservation category wetland located to the north of the premises;
- Privately owned groundwater bores located within 1 km of the premises; and
- Threatened Ecological Community within, and surrounding the premises

Fires at landfill premises are often difficult to control and can require significant quantities of water to be used to extinguish the fire. Firewater can run-off the site and infiltrate beneath the waste mass leading to increased leachate release to the environment. Firewater may also contain fire suppressants. Fire suppressants are chemicals that slow the spread or intensity of a fire. They may be used on the ground or dropped from an aircraft. Short-term fire suppressant foams are a combination of wetting agents and foaming chemicals, mixed with water. This allows the water to penetrate surfaces more easily. Long-term suppressants are essentially fertilizers (ammonium and diammonium sulphate and ammonium polyphosphate), with thickeners (guar gum) and corrosion inhibitors. Sometimes a red coloured pigment, made from iron oxide, is added to show where retardant has been applied.

Current evidence does not suggest any significant effects on birds or mammals. However, long-term fire retardants have been observed to cause effects on some species of native plants. Water plants and animals are more sensitive to the effects of fire retardants. A-Class foams can be moderately toxic to aquatic life.

Without effective containment measures, leachates, firewater and fire suppressants have the potential to infiltrate to soil and groundwater or flow into surface water bodies. This may lead to adverse environmental impacts or affect the beneficial use of these resources. As outlined in Section 3.3 a number of landfill and stockpile fires have occurred at the premises.

In the event of a fire event, smoke and particulates would be released. This may cause amenity and public health impacts for human receptors. The inhalation of particulate matter can cause respiratory distress. The burning of waste and vegetation surrounding the landfill can cause damage and impact to terrestrial habitat and wetlands.

4.3.2 Criteria for assessment

There are no specific consequence criteria for smoke emissions or damage to terrestrial ecosystems. The general provisions of the EP Act make it an offence to cause or allow unreasonable emissions that unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person. Additionally, Section 50A of the EP Act makes it an offence for a person who causes, or allows to be caused, material environmental harm.

Considering the relevant receptors as described in section 4.1.2, the following guidelines are considered appropriate consequence criteria for groundwater and surface water in the vicinity of the premises:

1. Australian Water Quality Guidelines for Fresh and Marine Water Quality ANZECC & ARMCANZ (2000) for slightly–moderately disturbed ecosystems (95% protection level trigger values)
2. Australian Drinking Water Guidelines (NHMRC & ARMCANZ (2011))
3. Guidance values for freshwater ecosystems, drinking water and recreational water, as published in the *PFAS National Environmental Management Plan* (Heads of EPAs Australia and New Zealand, 2020) (the PFAS NEMP).
4. Contaminated Sites Ground and Surface Water Chemical Screening Guidelines Department of Health (DoH 2014).
5. A screening value of 10 times the guidance values for drinking water value as published in the PFAS NEMP, based on guidance published in DoH (2014).
6. Recreational water, short-term and long-term irrigation water, and stock watering (ANZECC & ARMCANZ, 2000)

4.3.3 Applicant/licence holder controls

Refer to Section 4.1.1 of this report.

4.3.4 Consequence

Fire emissions – smoke emissions

If a fire were to occur within the timber or mattress stockpiles, then the Delegated Officer has determined that the impact of smoke emissions could result in low level or occasional medical treatment as well as low-level impacts to amenity on a local scale. Therefore, the Delegated Officer considers the consequence of smoke emissions from a landfill fire to be **Moderate**.

Fire emissions – leachate emissions

If an unauthorised fire occurs within the timber or mattress stockpiles, the Delegated Officer has determined that the impacts to groundwater and surrounding ecosystems from leachates and firewater will be mid-level on a local scale. Therefore, the Delegated Officer considers the consequence of fire impacts to be **Major**.

Fire emissions – Ecological receptors

If fire emissions occur from the premises, then the Delegated Officer has determined that the impact of fire to the surrounding conservation category wetlands, flora and fauna, and the Threatened Ecological Community (Banksia Dominated Woodland of the Swan Coastal Plain) would be high-level on a local scale. Therefore, the Delegated Officer considers the consequence of fire to native flora and vegetation to be **Severe**.

4.3.5 Likelihood of Risk Event

Fire emissions – smoke emissions residential receptors

The Delegated Officer has determined that smoke emissions from a fire within the timber or mattress stockpiles impacting public health and amenity at a moderate level could occur at some time. Therefore, the Delegated Officer considers the likelihood to be **Possible**.

Fire emissions – leachate emissions

Based upon the history of fires at the premises, the Delegated Officer has determined that the likelihood of a fire occurring resulting in the release of leachates and potential contamination of groundwater and associated ecosystems from leachates and firewater at a major consequence level could occur at some time. Therefore, the Delegated Officer considers the likelihood to be **Possible**.

Fire emissions – Ecological receptors

Taking into consideration the Applicant's proposed controls and the history of fires at the premises, the Delegated Officer has determined that the likelihood of fire spreading to the surrounding conservation category wetlands, flora and fauna, and the Threatened Ecological Community (Banksia Dominated Woodland of the Swan Coastal Plain) and having a severe consequence could occur at some time. Therefore, the Delegated Officer considers the likelihood to be **Possible**.

4.3.6 Overall rating

Fire emissions – smoke emissions

The Delegated Officer has compared the consequence and likelihood rating described above and determined that the overall rating for the risk of smoke emissions from a landfill fire occurring within the mattress, green waste or timber stockpiles is **Medium**.

Fire emissions – leachate emissions

The Delegated Officer has compared the consequence and likelihood rating described above and determined that the overall rating for the release of leachates and potential contamination of groundwater and associated ecosystems due to a landfill fire occurring within the mattress, green waste or timber stockpiles is **High**.

Fire emissions – Ecological receptors

The Delegated Officer has compared the consequence and likelihood rating described above and determined that the overall rating for the risk of fire emissions at the premises to ecological receptors is **Extreme**.

4.3.7 Acceptability of risk event

Given the overall risk rating ranges from Medium to Extreme the Delegated Officer has determined that the risk event for smoke/fire will not be tolerated.

4.4 Detailed risk assessment for leachate from the storage of timber and mattresses

4.4.1 Hazard characterisation and impact

Leachate is formed from the infiltration of water through waste. Leachate generated from the timber waste and mattress stockpiles may contain organic matter, inorganic compounds, nutrients, hydrocarbons, metals and metalloids, pesticides, synthetic organic compounds and other miscellaneous contaminants including PFAS.

The quantity and quality of leachate from the timber waste and mattresses will be influenced by the waste types, the control of stormwater and the ambient meteorological conditions. A detailed summary of the timber and mattress stockpiles is described in Section 3.1

The Delegated Officer considers the receptor most likely to be at risk from leachate emissions to be:

- Wetlands to the north, east and southeast, including the conservation category wetland located to the north of the premises;
- Wellesley and Brunswick Rivers. Located ~ 130m southeast and ~430 m south respectively;
- ~19 privately owned groundwater bores located within 1 km of the premises; and
- Threatened Ecological Community within and surrounding the premises.

Without effective containment measures, leachates have the potential to infiltrate to soil and groundwater or flow into surface water bodies. This may lead to adverse environmental impacts or affect the beneficial use of these resources.

4.4.2 Criteria for assessment

The guidelines which are considered appropriate for the known and potential beneficial uses of groundwater in the vicinity of the premises include:

- Australian Water Quality Guidelines for Fresh and Marine Water Quality ANZECC & ARMCANZ (2000) for slightly–moderately disturbed ecosystems (95% protection level trigger values)
- Australian Drinking Water Guidelines (NHMRC & ARMCANZ (2011))
- Guidance values for freshwater ecosystems, drinking water and recreational water, as published in the PFAS National Environmental Management Plan (Heads of EPAs Australia and New Zealand, 2020) (the PFAS NEMP).
- Contaminated Sites Ground and Surface Water Chemical Screening Guidelines Department of Health (DoH 2014).
- A screening value of 10 times the guidance values for drinking water value as published in the PFAS NEMP, based on guidance published in DoH (2014).
- Recreational water, short-term and long-term irrigation water, and stock watering (ANZECC & ARMCANZ, 2000)

4.4.3 Applicant/licence holder controls

Refer to Section 4.1.1.

4.4.4 Consequence

The Delegated Officer has taken into account the siting of the premises, the results of sampling undertaken for timber waste, the detailed contamination status of the premises (as detailed in the licence renewal decision document granted on 27 June 2022), and comparison to relevant assessment criteria and determined the impact of leachate emissions on groundwater to be mid to long-term or permanent impact to an area of high conservation value. Therefore, the Delegated Officer considers the consequence to be **Major**.

4.4.5 Likelihood of Risk Event

The Delegated Officer has determined that leachate emissions from the storage of timber waste and mattresses impacting an area of high conservation value could occur at some time. Therefore, the Delegated Officer considers the likelihood to be **Possible.**.

4.4.6 Overall rating

The Delegated Officer has compared the consequence and likelihood rating described above for the Risk Criteria and determined that the overall rating for the risk of leachate impacts from the storage of mattresses and timber waste is **High**.

4.4.7 Acceptability of risk event

As per *Guideline: Risk Assessments* (DWER 2020) the Delegated Officer has determined that the risk event of leachates from the storage of timber waste and mattresses may be tolerated if the licence holder was proposing further controls eg installation and transfer of the waste to a hardstand area with stormwater and leachate infrastructure. However, in the absence of additional controls and given the extreme risk of fire at the premises, regulatory controls have not been considered for this risk event.

5. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 25/01/2023	N/A	N/A
City of Bunbury advised of proposal on 25/01/2022	In correspondence 25/02/2023 the City of Bunbury advised that the City has no comment in relation to the licence amendment and the City does not require a planning approval related to the request as the property as the property is outside the City boundaries. The City stated that it is the intention of the property owners (City of Bunbury and Shire of Harvey) to extend the lease of the land to BHRC beyond the current date of 1 July 2023. At this time, the negotiations of the lease extension have not reached a point where the timeframe of the lease can be advised. The lease agreement will retain the core elements of the existing lease and would not look to prohibit the activities that BHRC undertake on the site under their licence.	The Delegated Officer notes this advice and advises that the licence holder is responsible for ensuring the lease is extended prior to it expiring in July 2023.
Shire of Harvey advised of proposal on 25/01/2023	N/A	N/A
Applicant was provided with draft documents on 13 April 2023	Comments received via email on 30 June 2023 with additional information received on 26 July 2023 and 3 August 2023. Refer to Appendix 2 for a summary of comments provided.	Refer to Appendix 2

6. Conclusion

In relation to the storage and/or processing of stockpiles of mattresses and timber waste, the Delegated Officer has considered the licence holders operating history, including non-compliances with licence conditions and the enforcement action taken by DWER in relation to activities at the premises.

The risk assessment undertaken for the application shows that operator history/performance is increasing the risk profile of the premises, particularly where management actions are required to control and mitigate risks associated with waste acceptance, processing, stockpiling, and the associated emissions and discharges.

In particular, the following risks have been identified as being high or extreme:

(i) Impacts to groundwater and surrounding ecosystems from leachates and firewater – High Risk; and

(ii) Impact of fire emissions to the surrounding conservation category wetlands, flora and fauna, and the Threatened Ecological Community (Banksia Dominated Woodland of the Swan Coastal Plain) – Extreme Risk.

Based on the assessment in this decision report, the delegated officer has determined that a licence will be amended to allow for amendments to waste acceptance and storage requirements, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

The Delegated Officer has not approved the aspect of the application seeking authorisition for the continued storage of mattresses and timber stockpiles to the east of the premises on the basis that these activities pose an extreme risk to ecological receptors. Approval for this activity will not be included on the licence.

The Delegated Officer notes that the current lease for the premises expired on 1 July 2023. It is the responsibility of the licence holder to ensure that the lease is renewed, and all relevant planning approvals are in place to facilitate on ongoing occupancy and operation of the premises.

6.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
Condition 1 Table 1	Removal of used trye hardstand infrastructure specifications, and the inclusion of infrastructure requirements for the green waste storage area.
Condition 2 Table 2	Amendment to the timeframe for the connection of aspiration wells to the active LFG management system. Removal of stormwater pond 2 from the licence.
Condition 5 Table 3	Inclusion of throughput and amendments to the acceptance of clean fill, hazardous waste, batteries, green waste, scrap metal and e-waste. Additional requirements for the acceptance, handling and storage of hazardous and dangerous goods.
Condition 7 Table 4	Removal of crushing requirements and update to Inert Waste Type I processing requirements. Inclusion of processing requirements for scrap metals, e-waste, putrescible wastes, and hazardous wastes. Amendment of tyre processing and storage requirements. Additional requirements for the acceptance, handling and storage of hazardous and dangerous goods.
Condition 16	Removal of duplicated fire management conditions that have been conditioned in Condition 17
Condition 17	Inclusion of a requirements for the licence holder to implement a Fire and Emergency Management Plan that is consistent with Australian Standard AS3745

Conditions 18-26	Removal of conditions relating to the crushing and processing of Inert Waste Type 1 and Clean Fill.
Condition 33	Inclusion of monitoring requirements for green waste stockpiles/windrows Removal of reporting requirements for Stormwater Pond 2 as it is no longer on the licence
Condition 39 Table 11	Inclusion of green waste stockpiles/windrows monitoring in the Annual Environmental Report.

References

1. ASK Waste Management Consultancy Services (ASK) (2021a), Landfill Closure Management Plan, Bunbury Harvey Regional Council. November 2021
2. ASK Waste Management Consultancy Services (ASK) (2021a), Landfill Environmental Management Plan (LEMP) Cells 2/3, Stanley Road Waste Management Facility. March 2019.
3. ASK Waste Management Consultancy Services (ASK) (2022), Supporting Information for Licence Amendment Application, Stanley Road Class II Putrescible Landfill: L8949/2016/1, Bunbury Harvey Regional Council. May 2022.
4. Cardno (WA) Pty Ltd (Cardno) 2022. Technical Memorandum, Wood Stockpile Sampling, Stanley Road Waste Facility, March 2022.
5. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
6. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
7. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
8. Department of Water and Environmental Regulation (DWER) 2021, *Guideline: Assessment and management of contaminated sites*.
9. GHD (2018), Bunbury-Harvey Regional Council, Stanley Road Landfill, Detailed Hydrogeological Investigation. July 2018

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
Condition 2 Table 2	During the 21 day comment period, it was identified that stormwater pond 2 was still listed in the infrastructure table within the licence. On 26 July 2023 BHRC confirmed the pond is not operational due to the liner being compromised. BHRC added that the pond is not included in the landfill closure management plan and intend to decommission the pond.	In line with this information, the integrity of the pond, the current landfill closure management plan, and the intent to decommission the pond, stormwater pond 2 has been removed from the licence. Should BHRC wish to reinstate the use of the pond in the future, a licence amendment will be required, including the requirement to demonstrate the integrity and permeability of the liner. Should BHRC wish to decommission the pond, a works approval would be required to manage potential emissions and discharges associated with the decommissioning works.
Condition 7 Table 4	Putrescible waste storage has now been relocated to the Transfer Station Area with putrescible waste being placed directly in to a $30m^3$ skip bin.	The decision document and risk assessment have been updated to reflect the change to putrescible waste acceptance and processing.
Condition 7 Table 4	The proposed green waste processing area has been relocated due to budget constraints. The newly proposed area was constructed and used for tyre storage. confirmation from the Bushfire Control Officer that the area is suitable for the storage of green waste has been provided.	The location of the green waste storage and processing area in the licence. The Delegated Officer notes that regulatory conditions related to the storage and processing of green waste remain unchanged with the exception of the low fuel buffer zone. The Delegated Officer considers it appropriate to reduce the buffe zone to 75m due to information provided by the Bushfire Control Officer and limiting the volume of green waste stored at the premises.
Condition 30 Table 11	Please update the reporting requirements for landfill gas monitoring to a format and that is able to be collated by the Bunbury Harvey Regional Council and in a format suitable for DWER.	The Delegated Officer has removed the requirements for the licence holder to report data in a graphical format. This was a clerical error in the previously granted licence and is in line with the reporting requirements for similar facilities across Western Australia.
Condition 17	Confirmation by the licence holder that a Fire and Emergency Management Plan will be prepared by a within six months of the amendment being granted and would like this commitment added to the licence.	The requirement to prepare and implement a Fire and Emergency Management Plan within six months has been added to the licence.

Appendix 2: Application validation summary

<table>
<tr><th colspan="7">SECTION 1: APPLICATION SUMMARY</th></tr>
<tr><td colspan="7">Application type</td></tr>
<tr><td>Works approval</td><td>☐</td><td colspan="5"></td></tr>
<tr><td rowspan="5">Licence</td><td rowspan="5">☐</td><td>Relevant works approval number:</td><td></td><td>None</td><td>☐</td></tr>
<tr><td colspan="3">Has the works approval been complied with?</td><td colspan="2">Yes ☐ No ☐</td></tr>
<tr><td colspan="3">Has time limited operations under the works approval demonstrated acceptable operations?</td><td colspan="2">Yes ☐ No ☐ N/A ☐</td></tr>
<tr><td colspan="3">Environmental Compliance Report / Critical Containment Infrastructure Report submitted?</td><td colspan="2">Yes ☐ No ☐</td></tr>
<tr><td colspan="5">Date Report received:</td></tr>
<tr><td>Renewal</td><td>☐</td><td>Current licence number:</td><td colspan="3"></td></tr>
<tr><td>Amendment to works approval</td><td>☐</td><td>Current works approval number:</td><td colspan="3"></td></tr>
<tr><td rowspan="2">Amendment to licence</td><td rowspan="2">☒</td><td>Current licence number:</td><td colspan="3">L8949/2016/1</td></tr>
<tr><td>Relevant works approval number:</td><td></td><td>N/A</td><td>☐</td></tr>
<tr><td>Registration</td><td>☐</td><td>Current works approval number:</td><td></td><td>None</td><td>☐</td></tr>
<tr><td colspan="2">Date application received</td><td colspan="5">30 May 2022</td></tr>
</table>

Applicant and premises details	
Applicant name/s (full legal name/s)	Bunbury Harvey Regional Council
Premises name	Stanley Road Waste Facility
Premises location	51 Stanley Road, Wellesley WA 6233 Lot 45 on Plan 17161
Local Government Authority	Shire of Harvey
Application documents	
HPCM file reference number:	DER2016/000056-1~34
Key application documents (additional to application form):	2C *Supporting Information for Licence Amendment Application, Stanley Road Class II Putrescible Landfill: L8949/2016/1, Bunbury Harvey Regional Council* (Ask Waste Management Consultancy Services, May 2022) 8A *Detailed hydrogeological report* (GHD, July 2018) 8B *Landfill Closure Management Plan* (Ask Waste Management Consultancy Services, November 2021) 8C *Landfill Environmental Management Plan (LEMP) Cells 2/3, Stanley Road Waste Management Facility* (ASK Waste Management Consultancy Services, March 2019) 8D *Technical memorandum, Stanley Road Waste Facility, Wood Stockpile Sampling* (Cardno, 31 March 2022)
Scope of application/assessment	
Summary of proposed activities or changes to existing operations.	***Licence amendment application*** Amendment to remove Category 13, reduce the quantity of tyre storage, amend tyre stockpiling conditions, allow for the consolidation and transfer of putrescible waste within the Transfer Station Loading Area including the ability to store putrescible waste on-site in bins for up to 72 hours prior, increase hazardous waste throughput, increase waste oil throughput, allow for the acceptance of car batteries, electronic waste, and fridges, add category 61A to the licence to facilitate temporary storage of mattresses, timber and green wastes stockpiled on the site.

Category number/s (activities that cause the premises to become prescribed premises)

Table 1: Prescribed premises categories

Prescribed premises category and description	Assessed production or design capacity	Proposed changes to the production or design capacity
Category 13 - Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned.	25,000 tonnes per annual period	0 (remove category 13 from the licence).
Category 57 - Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	8,000 tyres per annual period	350 tyres to be stored on site at any time
Category 61 - Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	25 tonnes per annual reporting period.	Previously removed from the licence.
Category 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.	N/A	4,000 tonnes per annum (separated green waste only) Licence holder also refers to mattress and timber stockpiles already present on the site, but has not requested an annual limit.
Category 62 - Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	35,000 tonnes per annual period	Licence holder requested to add car batteries, electronic waste and fridges, and requested to increase the limit for household hazardous waste. Licence Holder has requested 40,000 tonnes. 200 tonnes of which for white goods (fridges, freezers and air conditioners)
Category 64 – Class II or III putrescible landfill site: premises on which waste (as determined by reference to the waste type set out in the document entitled “Landfill Waste Classification	100,000 tonnes per annual period[1]	No change has been requested.

and Waste Definitions 1996" published by the Chief Executive Officer and as amended from time to time) is accepted for burial.		

1 - In relation to Category 64 (putrescible landfill), conditions allowing the burial of waste at the premises were removed from the licence on 27 June 2022. The removal of these conditions was due to the risk assessment determining that the risk to human and environmental health, from continued emission of leachate from the unlined cells, was unacceptable. Category 64 remains on the licence to allow for the construction of the new cells only. An Environmental Protection Notice (EPN) also applies, which allows only certain types of inert and low risk waste to continue to be accepted at the facility.

Legislative context and other approvals

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes ☐ No ☒	Referral decision No: Managed under Part V ☐ Assessed under Part IV ☐
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes ☐ No ☒	Ministerial statement No: EPA Report No:
Has the proposal been referred and/or assessed under the EPBC Act?	Yes ☐ No ☒	Reference No:
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes ☒ No ☐	Certificate of title ☒ General lease ☐ Expiry: Mining lease / tenement ☐ Expiry: Other evidence ☒ Public authority that has care, control or management of the land.
Has the applicant obtained all relevant planning approvals?	Yes ☒ No ☐ N/A ☐	Contact shire to confirm planning approvals are current for all current and new activities.
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes ☐ No ☒	No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes ☐ No ☒	No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes ☒ No ☐	Groundwater licence (GWL170993) Licence to construct a new bore

		(CAW206106)
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ☒ No ☐	Name: Bunbury Groundwater Area (Proclaimed Groundwater Area), Brunswick River and Tributaries (Surface Water Area) Has Regulatory Services (Water) been consulted? Yes ☐ No ☒ N/A ☐ Regional office: South West
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes ☐ No ☒	Name: N/A
Is the Premises subject to any other Acts or subsidiary regulations	Yes ☒ No ☐	Native vegetation clearing regulations Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004,)
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes ☐ No ☒	N/A
Is the Premises subject to any EPP requirements?	Yes ☐ No ☒	N/A
Is the Premises a known or suspected contaminated site under the *Contaminated Sites Act 2003*?	Yes ☒ No ☐	Classification: contaminated – remediation required (C–RR) Date of classification: 15 Sept 2021