



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Western Metropolitan Regional Council

Licence: L8981/2016/1

Registered office: Wearne House
40 Marine Parade
COTTESLOE WA 6011

Premises address: WMRC Greenwaste Facility
Part Lot 12970 on Plan 219939
MOUNT CLAREMONT WA 6010

Grant date: Friday, 19 January 2018

Commencement date: Monday, 22 January 2018

Expiry date: Saturday, 30 June 2018

Decision

Based on the assessment detailed in this document the Department of Water and Environment al Regulation (DWER) CEO's Delegated Officer has decided to grant a licence. The DWER Delegated Officer considers that in reaching this decision, they have taken into account all relevant considerations.

Decision Document prepared by: Lauren Fox
A/Senior Licensing Officer

Decision Document authorised by: Steve Checker
Delegated Officer



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1 Purpose of this Document

This decision document explains how the delegated officer has assessed and determined the application and provides a record of the decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DWER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	62	20,000 tonnes per annual period
Application verified	Date: 16/06/2016	
Application fee paid	Date: 15/07/2016	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		



3 Executive summary of proposal and assessment

The Western Metropolitan Regional Council (WMRC) is a regional local government entity working on behalf of five member Councils in Perth's western suburbs. WMRC currently holds licence L7307/1998/10 for a solid waste depot at the JFR (Jim) McGeough Resource Recovery Facility (JFRRR) in Shenton Park which provides a waste transfer station for Councils, residents and commercial customers. This facility is used as a green waste storage facility by WMRC. Green waste is received at the JFRRR and transported to this premises for storage prior to being removed offsite. The JFRRR facility is located 450m east, south-east of the site. There is no public access to the green waste facility.

Green waste is predominantly sorted at the JFRRR prior to being brought onto the site. Due to this pre-sorting process, the facility has a low risk of receiving non-conforming wastes. If any non-conforming wastes are contained within the green waste, the occupier advises that the non-conforming wastes will remain in the green waste stockpiles as there is no green waste sorting or processing undertaken at the site. Any contamination material or non-conforming wastes are removed with the green waste and later sorted at the final disposal site.

The occupier has advised that an approximate average of 25 tonnes of green waste is delivered to the site each day, fluctuating between seasons. The occupier has proposed an annual throughput of 15,000 tonnes, with the application stating a design capacity of 20,000 tonnes per year. This application has been assessed on the 20,000 tonnes per year design capacity.

The premises is within the City of Nedlands (the City) however the land is owned by the State Government and WMRC have entered into a lease agreement with the Department of Local Government, Sport and Cultural Industries to lease a portion of Lot 12970. The current lease agreement is due to expire 30 June 2018 (currently enacted on a month-to-month basis) with four one year extensions available. The duration of the licence will reflect the current lease agreement and any extensions of the licence beyond this date will require confirmation of the lease being extended. The Premises is located within an area zoned 'Recreation' under the City's Town Planning Scheme No. 2. Planning approval was subsequently granted by the City on 20 December 2017 with no time restrictions.

The premises is immediately adjacent to the City of Nedlands Works Depot. A residential community is located approximately 450m south-west of the site which extends to the south. The John XXII College buildings are located 350m south-south-west of the site with the sports oval located adjacent to Lot 12970.

Approximately 40m north of the site is a Confirmed Carnabys Cockatoo Roosting Area. Bush Forever areas, as defined under the State *Planning Policy 2.8: Bushland Policy for the Perth Metropolitan Region*, published by the Department of Planning (June 2010), are located 900m north, 1km north-east, 1km south-east, and 800m north-west (extension of northern area) of the premises.

Using the Department of Water's *Perth Groundwater Atlas* (PGA), groundwater is located 13m below ground level, with an aquifer thickness of 38m. PGA identifies the water to be considered brackish (total dissolved solids 1500 - 300 mg/L), have a low risk of iron staining, and have no known risk of acid sulfate soils. PGA described the surface geology as Tamala Limestone.

No emissions to air, surface water, groundwater or lands are expected during the normal operations of the facility. Periodic noise emissions may be experienced at a localised level from machinery movements and reversing beepers. Fugitive emissions (dust) may arise from truck and loading machinery movements and from handling of dusty loads are received, while smoke may result if the green waste is allowed to catch fire.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DWER's Regulatory Framework. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Premises operation	L1.2.1 to L1.2.4	<p><u>Emission Description (Leachate)</u></p> <p><i>Emission:</i> Stormwater contaminated with leachate from storage of green waste. Green waste has the potential to generate leachate.</p> <p><i>Impact:</i> Contamination of surrounding land and surface water drainage systems. Potential impacts on ecology of surface water and groundwater from the addition of nutrients. Impacts to the vegetation within the Bush Forever areas.</p> <p><i>Controls:</i> The application states that only green waste is proposed to be stored onsite on a compacted road base. No processing of the green waste will occur. The occupier has advised that the site is located on a raised ridge which does not get impacted by stormwater runoff.</p> <p>The supporting documentation states that green waste is only stored for a short time which assists in limiting decomposition of the material, which reduces the chance of leachate generation and stormwater becoming contaminated with leachate. The applicant maintains that waste will generally be removed within 24 hours of being received. Some wastes, under worst case scenario, may remain on the site for up to 7 days.</p> <p>No infrastructure controls to manage leachate or stormwater have been proposed by the occupier.</p>	Application supporting documentation
Premises		<u>Risk Assessment</u>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
operation continued		<p><i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Medium</p> <p><u>Regulatory Controls</u> Condition 1.2.1 has been included on the licence to limit the types and quantities of waste that can be accepted at the premises to those that have been assessed as suitable and can be sufficiently managed through the premises infrastructure and controls. Condition 1.2.2 requires the occupier to remove any wastes from the Premises that are not authorised by condition 1.3.1 to assist in mitigating the potential leachate risk of runoff from stockpiling non-conforming waste.</p> <p>Table 1.2.2 of condition 1.2.3 has been included to specify the authorised waste processes. This table specifies that composting is not authorised and that green waste must be removed within 7 days and, stored and handled on a compacted road base. These requirements assist in preventing the amount of leachate being generated, and consistent with the occupier's commitments.</p> <p>Given that no processing of green waste is occurring onsite, the green waste is only stored for a short duration, there are no surface water bodies in the vicinity of the site and depth to groundwater is 18m below ground level, no additional storage infrastructure for leachate management is determined by the Delegated Officer to be necessary as the risk to the environment is considered acceptable with the occupier's proposed controls.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Medium</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Fugitive emissions	L1.2.1, L1.2.3 and L1.2.4	<p><u>Emission Description</u></p> <p>Dust</p> <p><i>Emission:</i> Fugitive dust emissions from vehicle movements and from loading/unloading of green waste.</p> <p><i>Impact:</i> Degradation of local air quality. Potential for dust emissions to block photosynthesis of vegetation in the Bush Forever sites located 900m from Premises. Nuisance impacts on the comfort and amenity and health and wellbeing impacts on sensitive receptors located at John XXIII College 350m of the site and on the residential community 450m from the Premises.</p> <p><i>Controls:</i> No ongoing dust controls have been proposed as the supporting documentation has identified that dust emissions from the premises are not significant. In the event that dust emissions become an issue, the occupier proposes to use a water spray attached to a vehicle to spray down the site during loading operations. The occupier has advised that access roads to the site have recently been upgraded which have assisted in decreasing the amount of dust generated from vehicle movements.</p> <p><u>Risk Assessment</u></p> <p><i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Medium</p> <p><u>Regulatory Controls</u></p> <p>Table 1.2.1(condition 1.2.1) limits onsite activities to acceptance and storage of green waste which generate little to no dust emissions. Table 1.2.2 of condition 1.2.3 requires all loads to be wet down during unloading and loading as required to suppress dust and condition 1.2.4 requires that a sufficient supply of water is available onsite At all times. Condition 1.2.4 assists in dust suppression and in regards to fire management.</p>	<p>Application supporting documentation</p> <p><i>Environmental Protection Act 1986</i></p>
Fugitive emissions continued			



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Fugitive emissions continued	L1.2.3 and L1.2.4	<p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Medium</p> <p>Smoke <u>Emission Description</u> <i>Emission:</i> Smoke generated in the event of a fire. Fallout of ash and other particulates onto land and surface water. Generation of fire wastewater. <i>Impact:</i> Degradation to land surface water and groundwater systems from discharges of particulates and fire wastewaters. Nuisance and health impacts on sensitive receptors. <i>Controls:</i> A 60,000L onsite supply of water (storage tank) can be accessed via pumps and hoses stored at the nearby WMRC transfer station facility.</p> <p>Only a small quantity (2,400m³) of green waste is maintained onsite for extended (up to seven days) periods which assists in preventing the green waste from drying out and posing an increased fire risk.</p> <p>According to the application, the green waste stockpiles are stored according to the following dimensions which assist in fire prevention:</p> <ul style="list-style-type: none"> • Main stockpile (triangular): 40m by 33m, 2.5m in height; and • Smaller stockpile (L-shaped): 80m long, 14m wide, 2.5m high. <p><u>Risk Assessment</u> <i>Consequence:</i> Severe <i>Likelihood:</i> Rare</p>	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Risk Rating: High</i></p> <p><u>Regulatory Controls</u> Although the risk assessment has identified fire risk to be high, this is based on the consequence of a fire being severe, although the actual likelihood of fire is considered to be rare. Table 1.2.2 of condition 1.2.3 has been included to require a 5m firebreak to be maintained at all times around the green waste storage area and between stockpiles and, includes limits to stockpile height and the total amount of green waste authorised to be stored onsite at any one time reducing the amount of fire fuel; the storage limits are consistent with the application commitments. Condition 1.2.4 includes the requirement that a sufficient water supply be available onsite which is able to be used in the event of a fire.</p> <p><u>Residual Risk</u> <i>Consequence: Severe</i> <i>Likelihood: Rare</i> <i>Risk Rating: High</i></p>	
Odour Odour continued	N/A	<p><u>Emission Description</u> <i>Emission:</i> The storage of green waste is not expected to generate odour emissions however, odour may be generated from the pooling of leachate, especially if it becomes anaerobic. <i>Impact:</i> Potential for nuisance odour complaints. Nearest odour sensitive receptors are located approximately 450 m from the Premises. Odour impacts are anticipated to be localised.</p> <p><i>Controls:</i> No specific odour controls have been proposed in the application; however, only green waste will be received for storage for short periods without any shredding, which is unlikely to generate odour. No odorous feedstocks are proposed to be</p>	<p>Application supporting documentation</p> <p><i>Environmental Protection Act 1986</i></p>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>accepted.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Slight <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.2.1 limits authorised waste types accepted onsite and assists in restricting the acceptance of odorous wastes onto the site. Condition 1.3.3 restricts the period for which material can be stored on the premises and prohibits processing; this will reduce risk of anaerobic conditions developing, and lower odour risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Slight <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p>	
Noise	N/A	<p><u>Emission Description</u> <i>Emission:</i> Unloading/loading of green waste may generate some noise emissions. Noise emissions generated from vehicle movements including the use of reversing beepers. <i>Impact:</i> Potential for nuisance noise complaints. Nearest noise sensitive receptors are located approximately 450 m from the Premises. Noise impacts are anticipated to have minor localised impacts. <i>Controls:</i> No processing of green waste is proposed onsite. The supporting documentation has identified the risk of noise emissions as “extremely low” and as a result, no controls for noise emissions have been proposed by the occupier.</p>	<p>Application supporting documentation</p> <p><i>Environmental Protection (Noise) Regulations 1997</i></p> <p><i>Environmental Protection Act 1986</i></p>
Noise continued			



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Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>An acoustic assessment was provided to the Department in December 2017. As stated in the acoustic assessment, noise monitoring was undertaken at the Premises on 28 November 2017 and would likely comply with the day time (7am to 7pm) assigned levels specified in the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations).</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Given that the risk posed by noise emissions is low, no noise specific conditions have been included on the licence. Noise emissions can be regulated under section 49 of the <i>Environmental Protection Act 1986</i> and the Noise Regulations. Should noise emissions impact on the surrounding community, noise specific regulatory controls may be included on the licence such as restricting hours of operation or requiring 'croakers' or other low tonal reversing beepers to be fitted to onsite machinery.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p>	
Monitoring of inputs and outputs	L2.1.1	Condition L1.3.1 specifies the types and volumes of materials permitted to be accepted at the premises. To allow DWER to regulate the volume of wastes in compliance with this condition, condition L2.1.1 has been included on the licence to monitor the inputs and outputs of the premises. This condition also assists in assessing that the wastes accepted and processed at the site are at a throughput that can be sufficiently managed by the premises infrastructure and controls.	



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Information	L3.1.1 – L3.1.3, L3.2.1 and L3.3.1	<p>Condition L3.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years which assists DWER in regulating the conditions of this licence.</p> <p>Condition L3.1.2 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR) available on the DWER website. This condition assists DWER in regulating the occupier's compliance with licence conditions and allows an opportunity for DWER to review the occupier's environmental performance.</p> <p>L3.1.3 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. DWER will review these complaints as reported in the Annual Environmental Report (AER) and can consider the requirement for reassessment of any regulatory controls to address the complaints.</p> <p>L3.2.1 requires the occupier to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition L3.1.3. The AER is also required to provide the results for the monitoring of inputs/outputs, wastewater monitoring and groundwater monitoring. The occupier is also required to provide a summary of any malfunction of pollution control equipment or any environmental incidents. DWER reviews all of the data provided in the AER to assess compliance with the licence conditions and to monitor the environmental impacts from the premises.</p> <p>Condition L3.3.1 requires the occupier to notify the CEO if there is a breach of any licence limits (i.e. throughput limits). The notification required under this condition give DWER sufficient notice of any environmental impacts at the premises so that DWER</p>	
Information continued			



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		can determine if any further action is required to address the incident.	
Licence Duration		<p>The premises has a lease with the Department of Local Government, Sport and Cultural Industries (DLGSCI). The lease commenced on 1 July 2017 for an agreed period of one year however given the recent change of departmental names, a new lease is being prepared to formalise the lease agreement with the DLGSCI and the current lease is reflective of a month-to-month agreement.</p> <p>The one year period is due to expire on 30 June 2018 and there are four one year extension options available with the lease. The licence has been granted until 30 June 2018 to reflect the current lease agreement. The Licence Holder is required to notify DWER with evidence to confirm lease agreements beyond this date which will enable the Department to consider an administrative amendment to extend the licence duration.</p>	DWER's <i>Guidance Statement: Licence Duration</i> (August 2016)



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
25/07/2016	Application advertised in <i>The West Australian</i>	No comments received	N/A
25/07/2016	Application referred to interested parties listed: <ul style="list-style-type: none">• Department of Parks and Wildlife (DPAW);• Department of Sport and Recreation (DSR);• Western Australian Planning Commission (WAPC); and• City of Nedlands (the City).	<p><u>Department of Parks and Wildlife</u> Advised that they had no comment on the application.</p> <p><u>Department of Sport and Recreation</u> No comments received</p> <p><u>Western Australian Planning Commission</u> Comments were received 30 August 2016:</p> <ul style="list-style-type: none">• WAPC advised that the Premises is within the Perry lakes Redevelopment Act 2005 area and that under clause 32(1) of this Act, "an application for approval to commence development within this area must be made to the Western Australian Planning Commission".• WAPC is unable to provide comments on the licence application until a development application has been received. <p><u>City of Nedlands</u> Comments were received 5/08/2016:</p> <ul style="list-style-type: none">• The City advised that planning/development approval will need to be obtained from WAPC;• Noted that the occupier had not	<p><u>Department of Parks and Wildlife</u> N/A</p> <p><u>Department of Sport and Recreation</u> N/A</p> <p><u>Western Australian Planning Commission</u> The licence will not be granted until relevant approval from WAPC has been granted.</p> <p><u>City of Nedlands</u></p> <ul style="list-style-type: none">• DWER referred the application was to WAPC seeking comments on the proposal.• An assessment of the proposal was undertaken by the CEO's Delegated Officer considering the distance to sensitive receptors. The assessment has identified that risks posed by emissions from the premises are considered acceptable in regards to the environment and public health.• The risk assessment has identified that odour and dust emissions pose a low to moderate risk to the environment and public health which can be sufficiently managed by the occupier's proposed controls or through



Date	Event	Comments received/Notes	How comments were taken into consideration
		<p>demonstrated compliance with the Environmental Protection Authority's Guidance Statement No. 3: <i>Separation Distances between Industrial and Sensitive Land Uses</i> (2005);</p> <ul style="list-style-type: none">• A detailed Dust Management Plan (DMP) was required to be completed by an independent Environmental Consultant with reference to A <i>guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities</i> (2011) published by the Department of Environment and Conservation;• The premises is located within a bushfire prone area and any buildings onsite are required to comply with WAPC's State Planning Policy 3.4 <i>Natural Hazards and Disasters</i> (April 2016) and the Australian Standard AS 3959 - Construction of buildings in bushfire-prone areas;• A truck movement plan is required as part of the development/planning application which depicts the designated storage areas and demonstrated the largest vehicles ability to enter and leave premises in forward gear; and• A comprehensive Odour Management Plan (OMP) is required detailing the risk mitigation methods, and storage times given the sites close proximity to a school and hospital.	<p>regulatory controls. The CEO's Delegated officer does not consider the requirement for an OMP or DMP as being necessary for this proposal.</p> <ul style="list-style-type: none">• The fire suitability of constructed buildings is not regulated by DWER. Regulatory controls have been included through conditions 1.3.3 and 1.3.5 that assist in reducing the risk of fire onsite for storing green waste which is considerable as acceptable in terms of managing the risk to the environment and public health.• Truck movements are not regulated by DWER.• Odour emissions have been considered as part of this decision document.



Date	Event	Comments received/Notes	How comments were taken into consideration
28/07/2016	Application referred to Landcorp	No comments received	N/A
05/09/2016	Proponent sent a copy of draft instrument	<p>Comments received 24/10/2016:</p> <ul style="list-style-type: none">• Table 1.3.1 – pre-sorting of green waste prior to acceptance onsite<ul style="list-style-type: none">○ Do bulk verge collection trucks constitute pre-sorting?○ Does the household green bins constitute pre-sorting?• Table 1.2.2 – is wetting down only required when dust is problematic or expected to be generated?• Condition 1.2.4 – water is a ‘sufficient’ water supply?• Table 2.1.1- monitoring and recording undertaken at other WMRC premises.<ul style="list-style-type: none">○ Can the input/output be recorded in tonnes instead of m³?○ Aggregated loads are not weighed but are assigned a value of 0.3 tonnes.• The premises is not staffed during all operational hours.• No pumps or hoses are stored onsite for fire suppression.• The Premises is not located in a Bushfire Prone Area.	<p>The following changes/comments have been made.</p> <ul style="list-style-type: none">• Table 1.3.1:<ul style="list-style-type: none">○ Table renumbered from 1.3.1 to 1.2.1.○ Requirement to have pre-sorted green waste has been removed given that the premises is only authorised to accept green waste material. Conditions related to removal of non-conforming waste assist in reducing risk of leachate emissions generated from non-forming waste in unsorted waste streams.• Table 1.2.2: clarification provided to Applicant 25/10/2016 – “If it is raining, it would not be required to wet down loads as the weather conditions would have addressed the requirement for loads to be wet down. Similar, if the loads are unlikely to generate dust emissions, they would be unlikely to require being wet down. The intent of this requirement is to minimise the generation of dust so it will be up to the Licensee to assess the risk of loads and wet them down if required to minimise dust emissions.”• Condition 1.2.4: clarification provided to Applicant 25/10/2016 – “‘sufficient’ has the ordinary meaning of the word which is to ‘have enough’ or an



Date	Event	Comments received/Notes	How comments were taken into consideration
			<p>'adequate amount' to meet the operational requirements and to meet the requirements for dust and/or fire control. This is again up to the occupier to determine how much water is needed to address these requirements and have enough water onsite to meet them. I note page 21 of the licence application supporting documentation refers to a 60,000L tank. If you believe this is enough to address water requirements, then ensuring the tank is full would be sufficient."</p> <ul style="list-style-type: none">• Table 2.1.1:<ul style="list-style-type: none">○ Table updated to allow figures to be reported in tonnes.○ Clarification provided to Applicant 25/10/2016 – "The aggregated loads will need to be captured to meet the requirements of this condition. If 0.3 tonnes is assigned for each of these loads and you can demonstrate how that figure was determined when reported in the Annual Environmental Report, then it should be sufficient to meet the requirements of this condition. Similarly, if loads taken offsite are not weighed as they leave the site but are recorded at the final receipt/disposal site, this should be sufficient for recording purposes."• Decision document updated to reflect that the facility is not manned at all



Date	Event	Comments received/Notes	How comments were taken into consideration
			<p>times during operational hours and that firefighting equipment is not stored onsite.</p> <ul style="list-style-type: none">• The detail of the Premises being located in a Bushfire Prone Area was a comment DWER directly received from the City of Nedlands and as such, cannot be amended as the comments form part of the assessment and consultation process. The Delegated Officer notes that the Premises does not appear to be located within the Bushfire Prone Area itself (using the Department of Fire and Emergency Services online <i>Map of Bush Fire Prone Areas</i>) but is adjacent to this area.



6 Risk Assessment

Note: This matrix is taken from the Department's Guidance Statement: Risk Assessments (February 2017) as published by the former Department of Environment Regulation.

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Slight	Minor	Moderate	Major	Severe
Almost Certain	Medium	High	High	Extreme	Extreme
Likely	Medium	Medium	High	High	Extreme
Possible	Low	Medium	Medium	High	Extreme
Unlikely	Low	Medium	Medium	Medium	High
Rare	Low	Low	Medium	Medium	High