Amendment Report

Application for Licence Amendment

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

Licence Number	L9003/2016/1
Licence Holder	Eastern Metropolitan Regional Council
File Number	DER2016/002031
Premises	Hazelmere Resource Recovery Park 77 Lakes Road HAZELMERE WA 6104 Legal description – Lot 100 on Plan 4553, Lot 301 on Plan 405273 and Lot 814 on Plan 410889 and defined by the Premises map attached to the Revised Licence
Date of Report	01 October 2020
Decision	Revised licence granted

Melissa Chamberlain

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Date: 2020.10.01 13:46:25 +08'00'

Melissa Chamberlain
A/MANAGER WASTE INDUSTRIES
REGULATORY SERVICES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L9003/2016/1 is held by Eastern Metropolitan Regional Council (Licence Holder) for the Hazelmere Resource Recovery Park (the Premises), located at 77 Lakes Road, Hazelmere.

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 L9003/2016/1 has been granted.

The Revised Licence issued as a result of this amendment supersedes the existing Licence previously granted in relation to the Premises. Existing conditions have been transferred, but not reassessed, in the Revised Licence.

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 Application summary

On 1 July 2020, the Licence Holder submitted an application to the department to amend Licence L9003/2016/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following activities are being sought through the amendment:

- Acceptance of up to 3,500 tonnes per annual period of chemically treated power poles to an existing hardstand;
- Sorting and separation of power poles into copper chromium arsenate (CCA) treated or hydrocarbon coated. This ratio is expected to be 50:50;
- Removal of metal attachments and supports to the power poles;
- Processing of hydrocarbon coated power poles by removing the coated pole butt using hydraulic timber shears;
- Temporary storage of CCA treated power poles and hydrocarbon coated pole butts in bulk bins prior to offsite disposal at a Class IV landfill; and
- Further processing of the uncoated pole section for stockpiling as woodchip and disposal in the existing wood waste to energy plant (WWTEP).

The proposed amendment does not result in the addition of a Category or change in throughput to existing Categories.

The amendment is being sought to allow the disposal of untreated portions of wood power poles by means other than landfilling. Due to the power pole treatment process used in Western Australia prior to the advent of CCA treatment, the Licence Holder considers that a large portion of hydrocarbon coated power poles are untreated and suitable for reprocessing. The Licence Holder provided the following description (from the utility provider) of the pole mix treatment process to support this claim:

> *From the mid-1970s to the mid-1980s, a mixture of 1.5% aldrin (insecticide) and 0.1% pentachlorophenol (fungicide) in a diesel-tar, termed "pole mix", was used in the treatment of timber power pole butts to protect them from termite and fungal attack. Treatment*

involved pouring pole mix over the base of the pole as it was inserted into the hole. When the poles had to be re-treated, a 300mm deep trench was dug immediately around the base of the pole and pole mix was poured onto the pole to pool in the trench.

The Licence Holder considers that on this basis the upper section of the power pole, once removed from the butt and metal fittings, would be an uncontaminated waste timber suitable for processing at the premises in-line with existing activities.

Power poles in Western Australia have historically been chemically treated in the following ways:

- Hydrocarbon and organochlorine pesticide (pole mix) coating to the pole butt for power poles manufactured prior to the advent of CCA treatment;
- Whole pole CCA treatment; and
- Chemical treatment rods inserted during maintenance inspections. This method was used on existing pole mix coated poles after the use of pole mix was ceased.

The Licence Holder considers that the treatment types are easily visually identifiable due to their appearance. For pole mix treated poles, the treated pole butt has metal support fittings and a black appearance due to the hydrocarbon coating that is readily contrastable with the colour of the untreated portion. CCA treated poles are easily identifiable due to their green appearance, while chemical treatment rods are identified from plugs caps present on the circumference of the pole near ground level. A pole mix coated pole butt with chemical treatment rods present (left) and a CCA treated pole (right) are shown in Figure 1 below.

A summary of the proposed process is provided in Figure 2.

Figure 1: Pole mix coated pole butt containing chemical treatment rods drilled slightly above ground level with metal supports present (left). CCA treated power pole showing distinct green colouring (right).

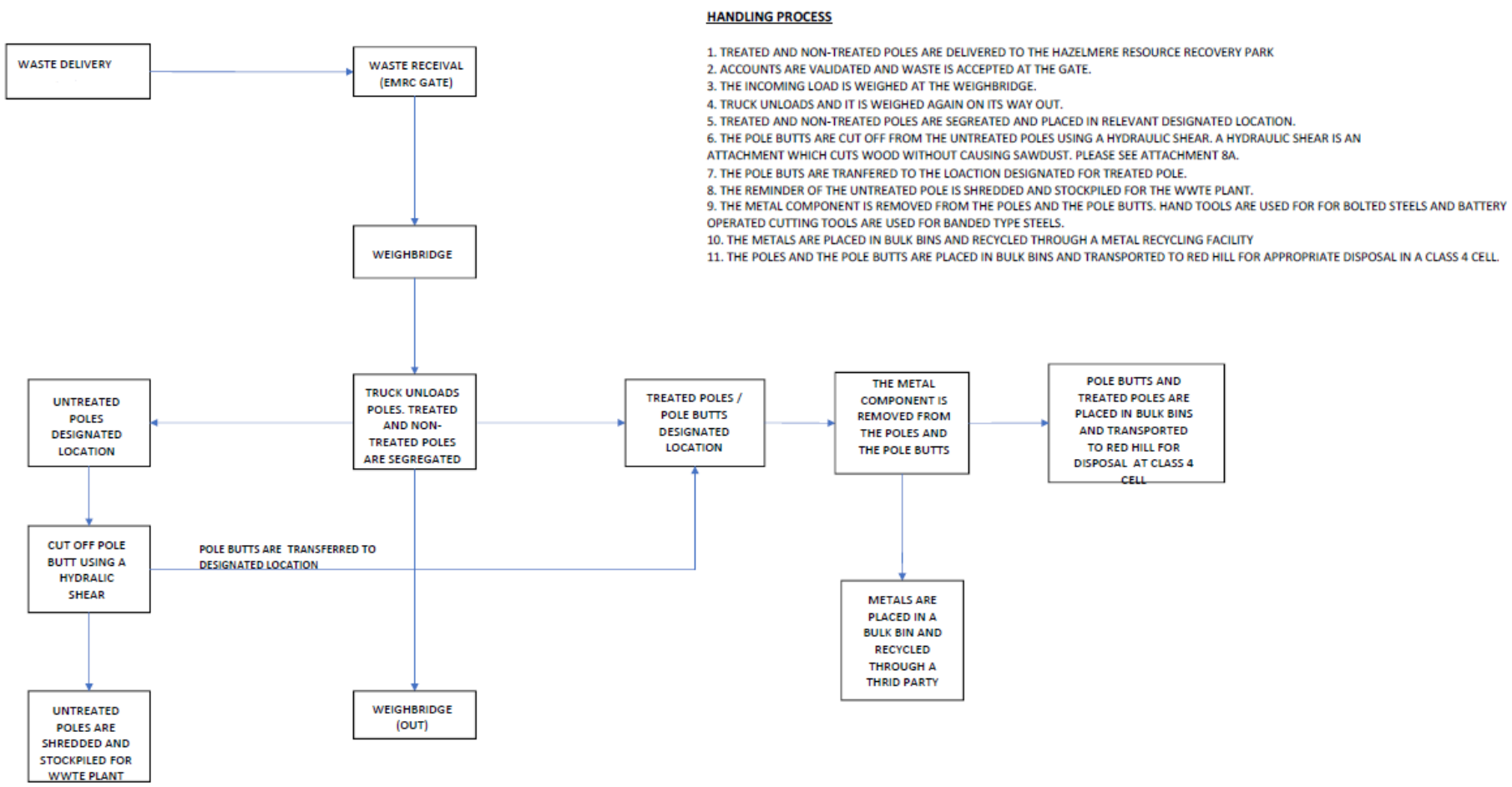

Figure 2: Summary of the proposed power pole process at the Premises

2.3 Part IV of the EP Act

On 14 January 2014 the Licence Holder referred the Hazelmere Wood Waste to Energy Plant to the EPA as a significant proposal under Section 38 of the EP Act. The EPA determined to assess the proposal at the level of Public Environmental Review on 31 March 2014. EPA Report No. 1554 was prepared in relation to the proposal and recommended that the proposal may be implemented subject to conditions. Subsequently Ministerial Statement (MS) 1028 was issued by the Minister for Environment. The following aspects of MS 1028 are considered relevant to the application:

- The proposal was to construct and operate a 4 megawatt indirect-fired pyrolysis kiln to process wood waste and produce synthesis gas for use as a fuel in internal combustion gas engines;
- The process limit for wood waste processed through the WTTEP is 13,000 tpa;
- The waste types permitted to be processed through the WTTEP are *wood waste that has not been treated or contaminated, such as uncontaminated shipping pallets, timber off-cuts, crates and cable reels*;
- The proponent is required to prepare and implement a Waste Acceptance Monitoring and Management Plan (WAMMP).

The WAMMP further specifies the acceptable wood waste types for processing through the WTTEP and addresses monitoring for potential contaminant sources within the wood waste. The key aspects of the WAMMP are summarised below:

Table 1: WAMMP summary.

Key aspect	Summary
Wood waste grading system	Wood wastes accepted at the premises will be classified according to the following grades: • **Grade 1 material:** material that is acceptable and can be shred and ground without further separation. • **Grade 2 material:** material that contains a minor amount of contaminating material, and/or the contaminating material can be removed within 5-10 minutes, and is acceptable to be shredded and ground after the contaminating material is removed mechanically or manually. • **Contaminated material:** material that contains an unacceptable amount of wood or wood products. It shall not be shredded and ground, but directed to the EMRC Red Hill Waste Management Facility, or if acceptable, redirected to the EMRC C&I sorting facility.
Visual inspection	Prior to combustion in the WWTEP wood waste stockpiles will be visually inspected according to the following procedure: • Spread the wood chip sample out over 1 m^2 of the hardstand to a nominal depth of 25 mm. • Take a photograph of the wood chip sample. • Visually inspect the wood chip sample and remove any MDF, Laminex or Formica coated and painted timbers. Also remove any other materials such as plastic, wire, strapping, inserts, metal objects, etc. • Place any removed wood materials into a plastic bag and label.

Key aspect	Summary
	Place all other materials in another plastic bag and label. • Take another photograph of the wood chip sample. • Spray the rubeanic acid solution onto the wood chip sample and wait 10 minutes for any colour to develop. • Take a photograph of the wood chip sample. • Remove any chips which have changed colour, place in plastic bag and label. • Recover the remaining wood chip sample and place into plastic bag and label. • Weigh each plastic bag to determine the proportion of each wood chip fraction and other contaminant materials in the sample. • Record details of all observations, weights and photographs in the monitoring register. • In the event the proportion of unacceptable wood chips exceeds acceptance criterion then the stockpile sampling, cone and quartering and visual inspections are to be repeated to confirm the original result. • Stockpiles failing a second visual inspection will be quarantined for laboratory analysis.
Laboratory analysis	Samples of woodchips will be sent for chemical analysis where the visual inspection has returned two negative results. The sampling will be in accordance with the following steps: • Any unacceptable wood wastes which were removed from the stockpile sample during the visual inspection will be recombined with the bulk of the sample. • The entire sample will be submitted to the laboratory for analysis of heavy metals (including As, Cu, Cr, Pb, Sn), total nitrogen, chloride and fluoride. • The level of unacceptable wood wastes within the sample is to be calculated from the concentrations of the target analytes and reference wood waste concentrations. • The measured concentrations are utilised in the mass balance to recalculate predicted emission rates and maximum GLCs using the modelling dilution factors. • Those maximum GLCs are to be compared with the relevant air quality standards to determine compliance and suitability of the material.

Key Findings:

1. The Delegated Officer considers that MS 1028 applies only to the Wood Waste to Energy Plant and not the whole premises. Therefore acceptance of power poles on to the premises is not restricted by MS 1028.
2. The Delegated Officer considers that the pole mix coated poles would fit the description of Grade 2 material under the WAMMP. This is due to the contaminating material (pole butt and metal attachments) being able to be removed within 5-10

minutes by mechanical (timber shears) and manual methods (hand tools for metal removal). Grade 2 material is an acceptable fuel source for the WWTEP once decontaminated.

3. The Licence Holder is not proposing final disposal of CCA treated power poles or pole mix coated pole butts in the WWTEP. These would be considered treated or contaminated wood under the classification system and not authorised under MS 1028. The Licence Holder intends to send this material to their Red Hill facility, in-line with the procedure in the WAMMP.
4. The potential contaminants within the power poles are not unique, as they are historically common wood treatment chemicals. As a result, potential contamination within the WWTEP feedstock from these sources has already been considered within wood waste already accepted at the Premises. Monitoring for these contaminants forms part of the WAMMP.
5. The Licence Holder is not proposing to increase the amount or type of wood processed through the WWTEP. Therefore the Delegated Officer considers that the proposed amendment is within the Authorised Extent of MS 1028.

3. 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 *Guidance Statement: Risk Assessments* (DER 2017).

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.

3.1 Source-pathways and receptors

3.1.1 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
Leachate/contaminated storm water	Storage of treated timber	Seepage to soils and groundwater	Concrete hardstand with raised perimeter to prevent storm water ingress. Inspection and wood waste grading. Segregation of treated timber into bulk bin receptacles. Covering of receptacles during rainfall.
		Overland flow	
Noise	Operation of the timber shears	Air/ windborne pathway	Operation only during business hours

3.1.2 Receptors

In accordance with the *Guidance Statement: Risk Assessment* (DER 2017), 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 *(Guidance Statement: Environmental Siting* (DER 2016)).

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

Human receptors	**Distance from prescribed activity**
Closest residential receptors	Approximately 450 m southwest of the processing area
	Approximately 460 m west of the processing area
Industrial receptors	Approximately 110 m northeast of the processing area
	Approximately 100 m north of the processing area
	Approximately 160 m south of the processing area
Environmental receptors	**Distance from prescribed activity**
Surface water	Hazelmere Lake South is located approximately 530 m west of the processing area
	Hazelmere Lake North is located approximately 790 m west-northwest of the processing area
Groundwater	Groundwater of the Perth Superficial aquifer is located approximately 2.5 - 3.5 m below the processing area, based on groundwater investigations previously conducted at the premises. Local groundwater flow direction in the vicinity of the processing area is inferred to be towards the west. This is generally consistent with local topography and wetland mapping which support the presence of a potential flowpath from the processing area towards Hazelmere Lake South to the west. Regional groundwater flow direction of the Perth Superficial aquifer is to the north-west, towards Helena River. There are 5 groundwater bores located downgradient of the Premises, between the Hazelmere Lakes. 3 are associated with the Talloman Rendering plant monitoring network and two are located on residential properties and potentially used for non-potable purposes.
Threatened and Priority Ecological Communities (TEC)	Banksia Dominated Woodlands of the Swan Coastal Plain TEC, located approximately 495 m south

	Banksia Dominated Woodlands of the Swan Coastal Plain TEC, located approximately 560 m west-southwest

Table 4: Geology and soil information at the Premises

Factor	Description
Soil type and surface geology	The Premises is located within the Pinjarra System, described as a poorly drained coastal plain with variable alluvial and aeolian soils. The Perth Geological series describes two soil types at the Premises: • SAND (S10) - white to pale grey at surface over sandy clay to clayey sand of the Guildford Formation. • PEATY CLAY (Cps) – dark grey and black, soft variable organic content with quartz sand in places. Site specific geotechnical information described the Premises as having an underlying layer of Bassendean sand over clayey soils of the Guildford formation. Soil logs determined that very dense, fine to medium grained, grey moist sands were present in the subsurface.
Acid sulfate soil (ASS)	Risk Class 1 - high to moderate risk of ASS occurring within 3m of natural soil surface.

The Delegated Officer considers the surface geology and presence of shallow groundwater, located approximately 2.5 to 3.5 mbgl, may allow a potential pathway through infiltration to groundwater.

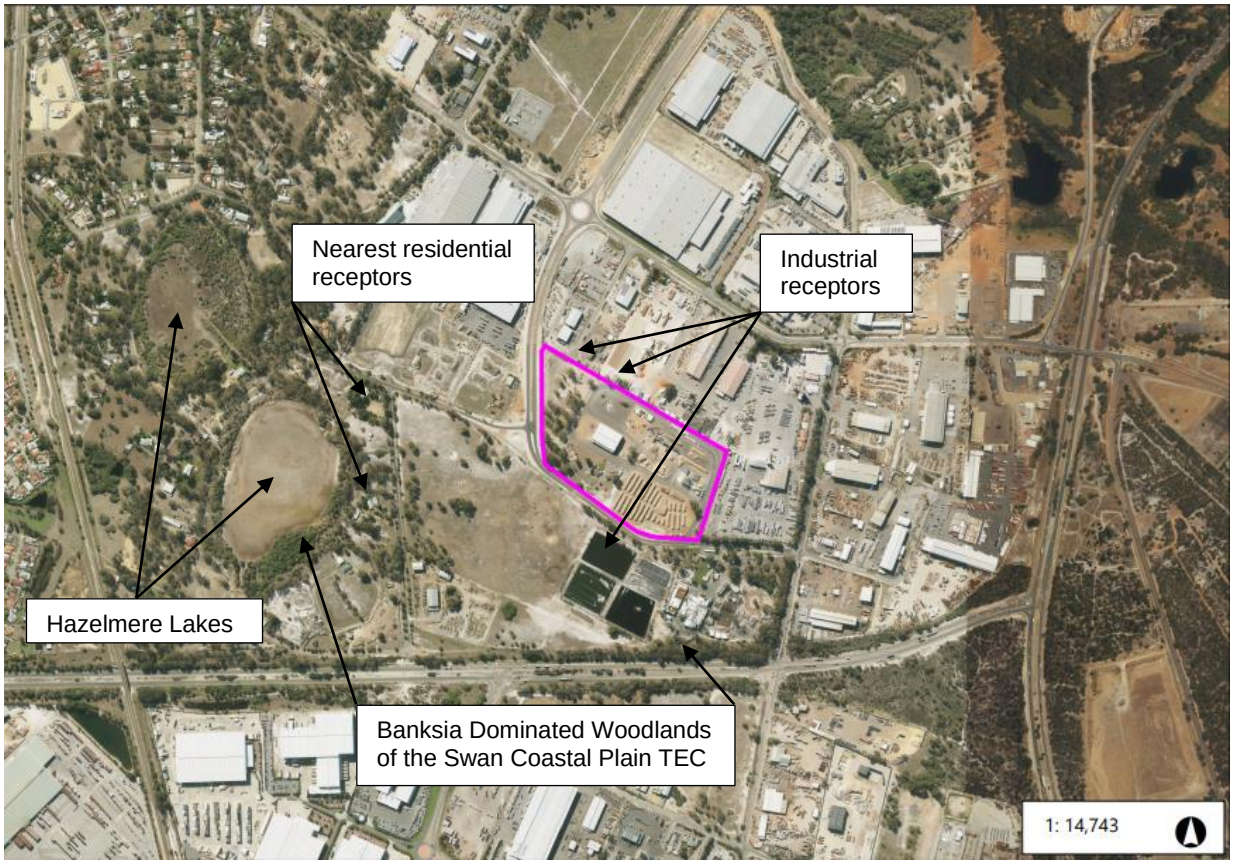

Figure 3: Potential receptors surrounding the Premises

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guidance Statement: Risk Assessments* (DER 2017) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. 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 3.1), 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 5.

The Revised Licence L9003 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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

Table 5: Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Operation								
Acceptance and storage of treated power poles	Leachate / contaminated storm water	Infiltration through soil to groundwater causing deterioration of water quality and potential impacts to down-gradient receptors	Groundwater (2.5 – 3.5 mbgl) Residences (450 m southwest and 460m west) Hazelmere Lake South (530 m west)	Refer to Section 3.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A
		Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Hazelmere Lake South (530 m west) Hazelmere Lake North (790 m west-northwest)	Refer to Section 3.1.1	C = Moderate L = Rare **Medium Risk**	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A
Decontamination of power poles using an excavator with a timber shear attachment	Noise	Air/windborne pathway causing impacts to amenity	Residences (450 m southwest and 460m west)	Refer to Section 3.1.1	C = Minor L = Unlikely **Medium Risk**	Y	Condition 4: Waste acceptance Condition 8: Waste processing	N/A

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

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

4. Consultation

Table 6 provides a summary of the consultation undertaken by the department.

Table 6: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (22 July 2020)	The City of Swan replied on 31/07/2020 confirming that EMRC is exempt from requiring planning approval under the *Planning and Development Act 2005* as the application related to public works. No further comments were provided.	N/A
Licence Holder was provided with draft amendment on (27 August 2020)	No comments were received.	N/A

5. Conclusion

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

5.1 Summary of amendments

Table 7 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 7: Summary of licence amendments

Condition no.	Proposed amendments
4 (Table 3: Treated power poles)	Inclusion of treated power poles as an acceptable waste type with a 3,500 tonnes per annual period limit and specifying the power pole treatment types subject to this application.
8 (Table 4: Treated power poles)	Addition of the proposed power pole decontamination and storage process within the table. Inclusion of treated power poles as a waste type for processing with associated licence holder controls specified as process limits.
8 (Table 4: Timber)	Additional process limit added to prevent the processing of pole mix coated pole butts and CCA treated power poles.
Definitions	Added a definition for CCA
Definitions	Added a definition for Pole mix
Schedule 1 (Figure 2)	Updated with the figure provided in the application.

References

1. Department of Environment Regulation (DER) 2016. *Guidance Statement: Environmental Siting*. Perth, Western Australia.
2. DER 2017. *Guidance Statement: Risk Assessments*. Perth, Western Australia.
3. DER 2015. *Guidance Statement: Setting Conditions*. Perth, Western Australia.
4. Environmental Protection Authority (EPA) 2015. *Hazelmere Wood Waste to Energy Plant: Report and recommendation of the Environmental Protection Authority*. Perth, WA.
5. Mitchell, Bob 1990. *The pesticide residue problem in beef cattle: success with contaminated power poles in south coastal areas.* Journal of the Department of Agriculture, Western Australia Series 4: Vol. 31: No. 3. Perth, Western Australia.
6. Strategen Environmental 2018. *EMRC Hazelmere Wood Waste to Energy Plant: Waste acceptance monitoring and management plan*. Unpublished report.
7. Western Power 2020. *Treated Wood Poles: waste stream assessment*. Unpublished report.

Appendix 1: Application validation summary

<table>
<tr><th colspan="7">SECTION 1: APPLICATION SUMMARY</th></tr>
<tr><td colspan="7">Application type</td></tr>
<tr><td colspan="2">Works approval</td><td>☐</td><td colspan="4"></td></tr>
<tr><td colspan="2" rowspan="4">Licence</td><td rowspan="4">☐</td><td>Relevant works approval number:</td><td></td><td>None</td><td>☐</td></tr>
<tr><td colspan="2">Has the works approval been complied with?</td><td colspan="2">Yes ☐ No ☐</td></tr>
<tr><td colspan="2">Has time limited operations under the works approval demonstrated acceptable operations?</td><td colspan="2">Yes ☐ No ☐ N/A ☐</td></tr>
<tr><td colspan="2">Environmental Compliance Report / Critical Containment Infrastructure Report submitted?</td><td colspan="2">Yes ☐ No ☐</td></tr>
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<tr><td colspan="2">Renewal</td><td>☐</td><td>Current licence number:</td><td colspan="3"></td></tr>
<tr><td colspan="2">Amendment to works approval</td><td>☐</td><td>Current works approval number:</td><td colspan="3"></td></tr>
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<tr><td colspan="2">Registration</td><td>☐</td><td>Current works approval number:</td><td></td><td>None</td><td>☐</td></tr>
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<tr><td colspan="7">Applicant and Premises details</td></tr>
<tr><td colspan="3">Applicant name/s (full legal name/s)</td><td colspan="4">Eastern Metropolitan Regional Council</td></tr>
<tr><td colspan="3">Premises name</td><td colspan="4">Hazelmere Resource Recovery Park</td></tr>
<tr><td colspan="3">Premises location</td><td colspan="4">Lot 100 on Plan 4553 and Lot 301 on Plan 405273
Appears that the application form mistakenly left off Lot 814 on Plan 410889 which is within the premises boundary based on the existing licence</td></tr>
<tr><td colspan="3">Local Government Authority</td><td colspan="4">City of Swan</td></tr>
<tr><td colspan="7">Application documents</td></tr>
<tr><td colspan="3">HPCM file reference number:</td><td colspan="4">DER2016/002031-1~3</td></tr>
<tr><td colspan="3">Key application documents (additional to application form):</td><td colspan="4">Site plan
Proximity of sensitive receptors
Email from Controlled Waste Branch
Specifications of HWS hydraulic woodshears</td></tr>
</table>

	Confidential – Western Power briefing note discussing power pole waste stream assessment Processing flowchart Amendment fee calculator
Scope of application/assessment	
Summary of proposed activities or changes to existing operations.	Acceptance of new waste type of treated timber (power poles) New waste processing activities - CCA poles just to be stored, and then removed for disposal at Red Hill. - Hydrocarbon treated poles will have the butts removed by woodshears and then removed for disposal at Red Hill. The untreated part of this pole will be retained for use at the wood waste to energy plant at the premises. - Steel will be removed from all poles and separated for recycling. New equipment in the licence - Containment infrastructure is the bitumen hardstand to be used for storage and processing and bulk bins - New processing equipment specific to this operation will be an excavator using a hydraulic woodshear and bulk bins No works need to be undertaken

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 62: Solid waste depot	50,000 tonnes per annual period	No change requested, proposing to accept 3,500 tonnes per year of power poles
Category 61A: Solid waste facility	50,000 tonnes per annual period	

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 ☐ Expiry: Not needed based on it being amendment application with no change to boundary
Has the applicant obtained all relevant planning approvals?	Yes ☐ No ☐ N/A ☒	Approval: Expiry date: If N/A explain why? Likely to be covered by public works exemption as is the case for Red Hill L8889. Also, the proposed activity is not significantly different from current activities and therefore unlikely need separate planning approval.
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes ☐ No ☒	CPS No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes ☐ No ☒	Application reference No: N/A Licence/permit No: N/A 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 ☒	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ☐ No ☒	Name: N/A Type: Has Regulatory Services (Water) been consulted? Yes ☐ No ☐ N/A ☐ Regional office:
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes ☐ No ☒	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes ☐ No ☐ N/A ☒

Is the Premises subject to any other Acts or subsidiary regulations (e.g. *Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx*)	Yes ☒ No ☐	*Environmental Protection (Controlled Waste) Regulations 2004*\ Licence Holder has provided correspondence with Controlled Waste Branch showing what requirements will be needed.
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes ☐ No ☒	
Is the Premises subject to any EPP requirements?	Yes ☐ No ☒	
Is the Premises a known or suspected contaminated site under the *Contaminated Sites Act 2003*?	Yes ☐ No ☒	Classification: Lot 100 is classified as decontaminated