Amendment Report

Application for Licence Amendment

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

Licence Number	L9008/2016/1
Licence Holder	Community Greenwaste Recycling Pty Ltd
ACN	607 612 073
File Number	DER2016/002200-1
Premises	Community Greenwaste Recycling Lease Areas 5, 7, and 9 190 Flynn Drive, Neerabup Legal description - Part Lot 5 on Diagram 91435 Certificate of Title Volume 2083 Folio 241 As defined by the coordinates in Schedule 2 of the Licence
Date of Report	28 April 2021
Decision	Revised licence granted

Michael Greenslade

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

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1. Decision summary

Licence L9008/2016/1 is held by Community Greenwaste Recycling Pty Ltd (the Licence Holder) for Community Greenwaste (the Premises), located at Lease Areas 5, 7 and 9, 190 Flynn Drive, Neerabup.

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 L9008/2016/1 has been granted in part.

2. 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.

3. Amendment summary

On 22 June 2020, the Licence Holder applied to the Department to amend Licence L9008/2016/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments were sought:

- Change in Premises boundary to add Lease Area 5 and 9 to current Premises boundary (Lease area 7);
- Addition of Categories 13 and 67A;
- Decrease throughput of greenwaste to 20,000 tonnes per annum (tpa);
- Accept construction and demolition waste (bricks, concrete, wood, clean fill) up to 15,000 tpa;
- Accept treated power poles and other untreated and treated wood (15,000 tpa); and
- Shred treated wood and treated power poles onsite and add it to mulch.

3.1 Proposed activities

The proposed activities and throughputs associated with the application for amendment are summarised in Table 1.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
61A	25,000 tpa (greenwaste)	50,000 tpa	Addition of 15,000 tpa of construction and demolition waste and 15,000 tpa of treated timber and power poles. Greenwaste reduced to 20,000tpa
13	Not currently licenced	15,000 tpa	Construction and demolition waste (15,000 tpa)

67A	Not currently licenced	35,000 tpa	Compost proposed to consist of 20,000 tpa of greenwaste and 15,000 of treated timber and power poles.

3.1.1 Construction and demolition waste

The Licence Holder has proposed to accept and process construction and demolition wastes to create various screened sand, road base, track/hardstand, drainage/recycled fill or road base aggregate materials (see Figure 1). The Licence Holder has proposed to screen sand from coarse concrete / aggregate wastes, remove concrete reinforcing steel, and crush and screen concrete and brick waste. Reinforcing steel removed from concrete is proposed to be stockpiled for off-site scrap metal recycling.

Inspection of incoming construction and demolition waste is proposed, to ensure that no asbestos or asbestos containing material (ACM) is present. It is proposed that incoming loads are turned with a loader or excavator and non-conforming material is removed by hand. Contamination may consist of steel bolts and bracing, which will be removed offsite for scrap metal recycling, or plastic packaging, which will be removed to an onsite skip bin for disposal to landfill.

Samples of stockpiled finished products including screened sands and crushed concrete fines will be collected and sent for testing at a NATA certified lab. The Licence Holder has also proposed that clean fill will be accepted onto the premises and screened/added into recycled products. Figure 1 below shows the proposed processing of clean fill.

3.1.2 Composting

The Licence Holder has proposed to accept greenwaste and treated timber (blue pine pallets and power poles) as feedstocks for composting.

Shredded greenwaste, treated timber and power poles (below contaminant thresholds) are proposed to be mixed in various blend ratios, sometimes with the addition of other products such as peat, to create landscape mixes. This process would occur in the designated soil mixing and composting area (see Figure 1). Any composting that is undertaken is proposed to follow the protocols as set out in *Australian Standard AS4454: 2012 Composts, Soil Conditioners and Mulches*. Samples of stockpiled finished products will be collected and sent for testing at a NATA certified lab. Standard testing protocols would be followed and include testing for asbestos, heavy metals, acid sulphates, pH and particle size distributions where applicable.

The proposed feedstocks are discussed in more detail below:

Greenwaste

Greenwaste is proposed to be sourced from local government, commercial operators and general public, including pruning's, lawn clippings, logs and stumps. Greenwaste is proposed to be shredded (where required) and stored on site before being added to compost.

Power poles

Power poles are proposed to be sourced from Western Power and consist of weathered poles that have been removed and replaced. Power poles delivered to site are proposed to be stockpiled in a designated area (see Figure 2). The Licence Holder has advised that Copper Chrome Arsenate (CCA) treated power poles will not be accepted.

The Licence Holder has advised that power pole treatment can be identified by referring to the product identification markers stamped directly onto the timber. A code list of treatment plants and treatments will be provided to the site operators for reference.

The Licence Holder has proposed that power poles will be stored separately of all other products until testing confirms the product meets Landfill Waste Classification and Waste Definitions (LWCWD) Class 1 waste contaminant levels. The power poles will be shredded in a similar manner to the green and wood waste products. Shredded power poles will be stockpiled, and samples collected and sent for testing at a NATA certified lab. Testing will be as per the LWCWD. If the material is found to exceed the contaminant thresholds within the LWCWD, it would be removed from site and taken to an appropriately licenced landfill facility. If the material is found to be below the guidelines, it would be released for mixing into finished landscape products.

Blue pine pallets and offcuts

It is proposed that wood, consisting mainly of hardwood and softwood pallets (with pyrethrum based “blue” treatments only, and not CCA-treated “green” timber) and new building offcuts will be stockpiled and when there is a sufficient quantity it will be shredded in a similar manner to the green waste. It is proposed that the shredded wood waste will be stockpiled on the Premises. The Licence Holder has specified that only synthetic pyrethroid treated timber marked with the preservative code numbers 70, 73, 74, and 75 will be accepted and shredded.

3.1.3 Final Product

The Licence Holder has proposed that final product mulch and compost will be available for purchase at the Premises by the public. It is proposed that the final product will meet requirements of AS 4454 and be tested through a NATA accredited laboratory. The products would be placed within trailer/truckloads, and sold by weight, utilising the onsite weighbridge.

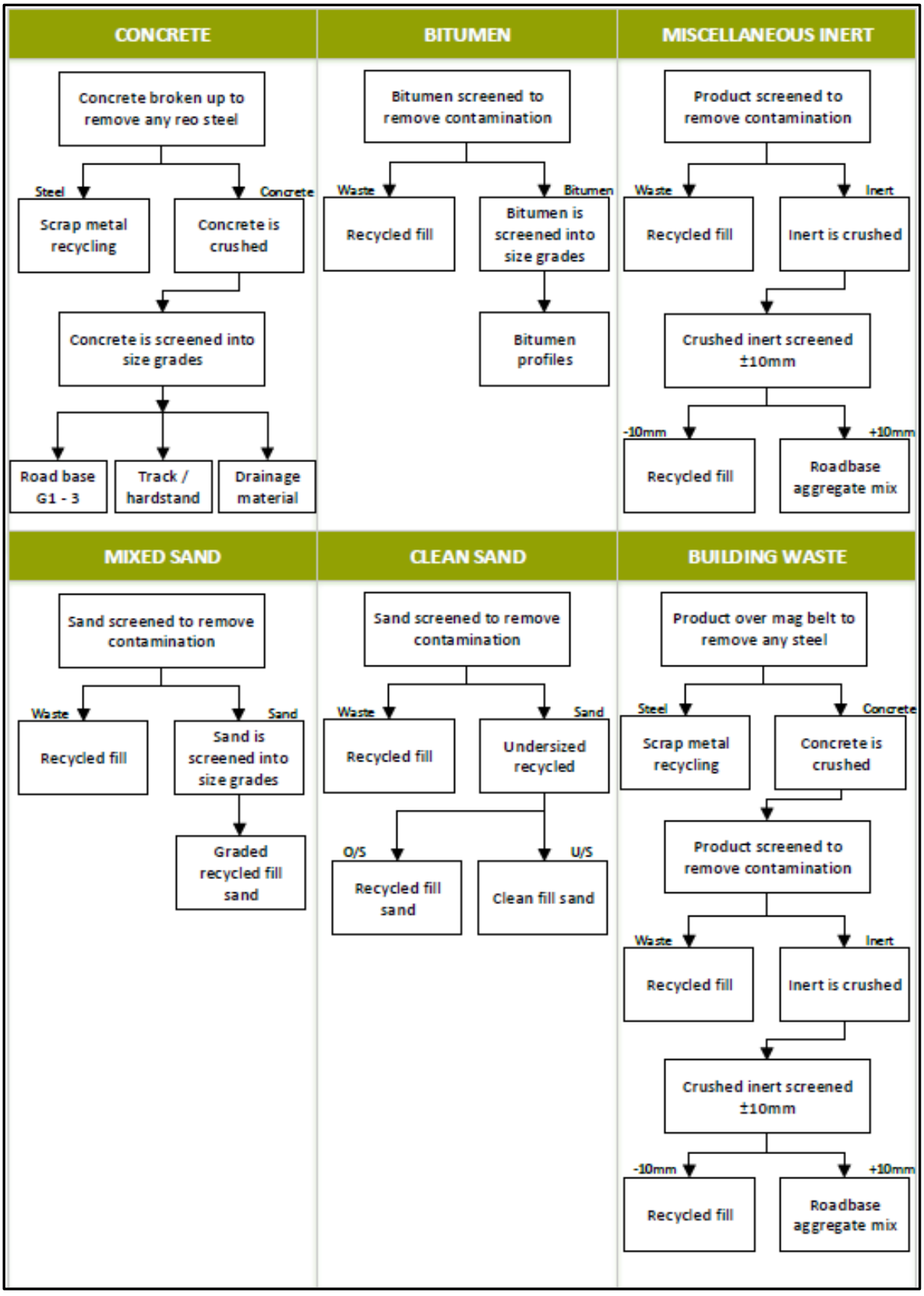

Figure 1: Proposed process flowchart

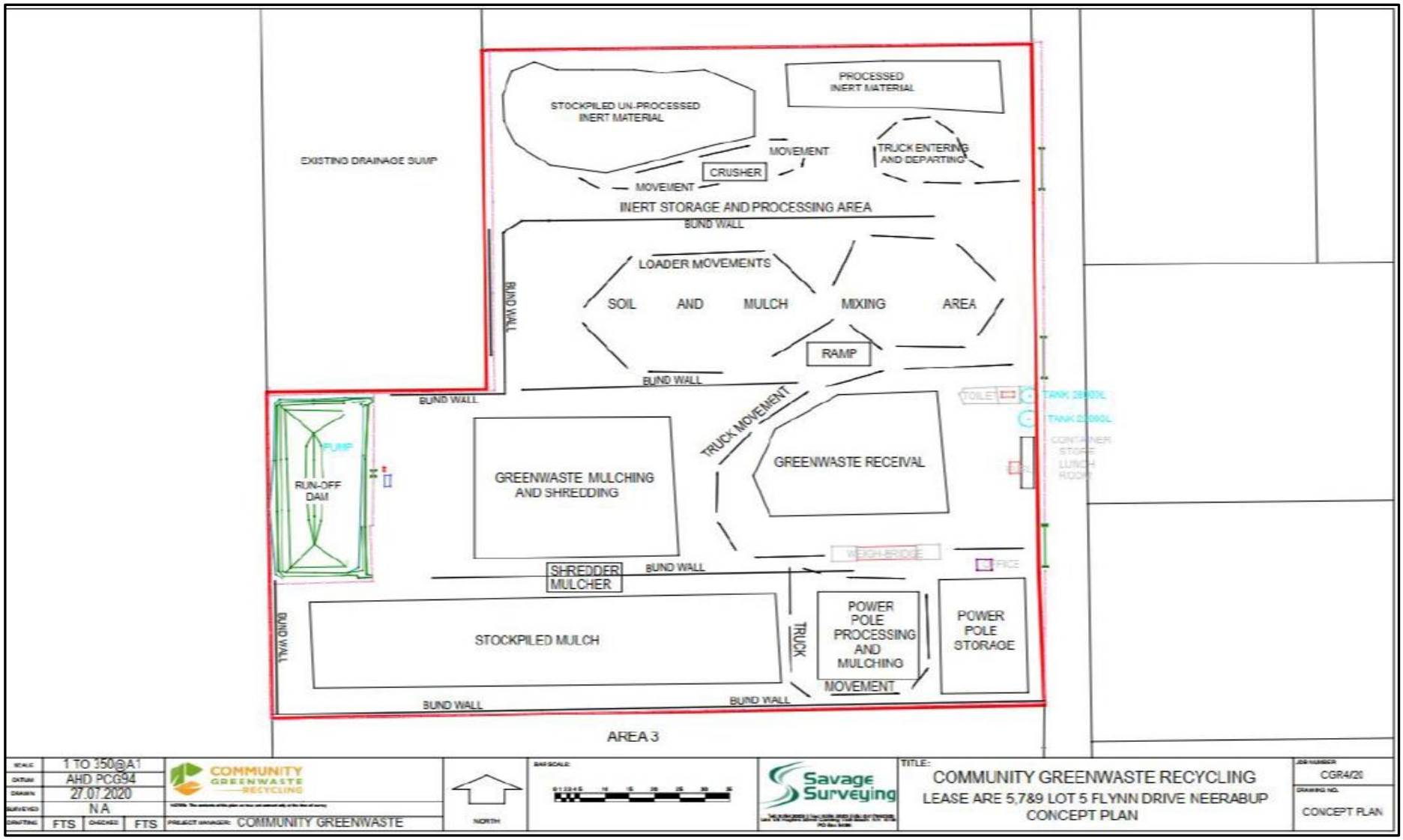

Figure 2: Proposed site layout

4. Relevant information

Noting the proposed activities, the following information is considered relevant.

4.1 Change to premises boundary

The Licence Holder has proposed the inclusion of Lease areas 5 and 9 to the existing prescribed premise boundary. With this change, the following is noted with regards the premises stormwater runoff and containment infrastructure.

The current stormwater dam is a 1039 m^3 containment pond lined with a 2mm HDPE liner, to achieve a permeability of 2.8 x 10^{-11} m/s. The pond design as per the original works on the premises has been designed to cater for a 72-hour duration, 1-in-20-year ARI critical rainfall event. Allowing for a 500mm freeboard, available capacity with the surface water storage pond is 716m^3. Within the combined lot catchment size, of approximately 21000 m^2, 4630 m^2 is managed via existing stormwater basins and the Lot 5 Urban Water Management Plan. The remaining 16,370m^2 catchment leads to the stormwater dam for on-site containment. The required total surface water runoff storage volume for the increased area of 16370m^2 is 669m^3, within the existing storage capacity of the surface water storage pond (including freeboard).

4.2 Blue pine treated timber

Blue pine is commonly treated with synthetic pyrethroids (a synthetic version of pyrethrin) to resist borers and termites (EPA NSW, 2017).

Pyrethrins were originally developed from chrysanthemum plant and have historically been used in household insecticides. Synthetic pyrethroids are synthetic versions of naturally occurring pyrethrins. Synthetic pyrethroids exhibit greater stability in the environment and are therefore more persistent. They are also designed to target specific pest species (APVMA, 2005; FPWA, 2013).

Blue pine may have a range of different preservatives and hazard levels and the blue colour is added to alert the user that the wood has been treated and is not indicator of the type of preservative the wood has been treated with (EPA NSW, 2017).

AS1604 *Specification for preservative treatment* requires that preservative-treated timber is marked with an alphanumeric code to identify the following minimum information:

- Treatment plant number indicating the place of manufacture;
- Preservative code;
- Hazard class; and
- Hazard suffix.

An example of these codes and common preservative numbers can be seen in Figure 3 below.

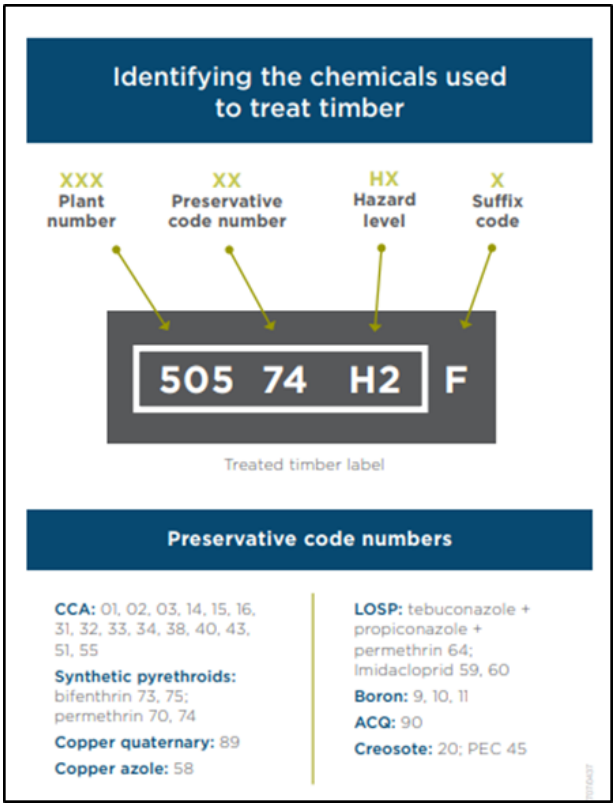

Figure 3: Identification of treated timber

The treated timber industry often uses the synthetic pyrethroids Bifenthrin and Permethrin. Permethrin can be identified by preservation codes 70 and 74 and Bifenthrin from preservation codes 73 and 75 (EPA NSW 2017) (see Figure 3 above).

4.3 Treated power poles

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 Copper Chrome Arsenic (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 treatment types are easily identifiable due to the numbers stamped on the poles.

5. Proposed controls

Table 2: Proposed controls

Sources	Emission	Proposed controls/Existing conditions
Crushing and screening of construction and	Dust	• Existing licence conditions relating to dust to apply to new activities; • Expanding perimeter ring main, free standing sprinkler system to all areas and stockpiles at the Premises.

Sources	Emission	Proposed controls/Existing conditions
demolition waste Vehicle movements	Noise	• Existing licence conditions relating to operating hours to apply to new activities; • Existing conditions regard operation of grinder/ shredder to apply to screening and crushing units; • Existing condition relating to grinder/shredder to be used behind bunding to apply to crushing and screening.
	Asbestos	• Asbestos waste not proposed to be accepted; • Asbestos Management Plan including visual inspection and no asbestos waste signage; • Visual inspection of tipped loads for asbestos waste; • Contaminated loads to be rejected and removed from the Premises; • Testing recycled products to ensure asbestos does not exceed 0.001% w/w.
Composting, blending and storage of untreated timber, greenwaste, soil blends, mulch, and landscape mixtures	Potentially Contaminated Stormwater due to interaction with residual matter on stockpiled material	• Existing licence conditions relating to infrastructure controls: Limestone hardstand, stormwater catchment basin HDPE lined with sediment trap (including 0.5m freeboard), perimeter bund wall with height markers; • Compacted limestone hardstand for new stockpiles/ processing areas; • Extend perimeter bunding around new hardstand areas; • Increase height of bunding around the settlement pond area to the same height as the stormwater pond wall.
	Dust	• Expanding perimeter ring main, free standing sprinkler system to all areas and stockpiles at the Premises; • Existing licence conditions relating to dust to apply to new activities.
	Odour	• Compliance with AS 4454; • Maintaining temperature and moisture levels of compost.
	Fire	• Existing licence conditions relating to moisture and temperature requirements for storage of greenwaste to prevent spontaneous combustion; • Existing licence condition relating to maintenance of firefighting equipment and access around stockpiles; • Expanding perimeter ring main, free standing sprinkler system to all areas and stockpiles at the Premises; • Maintaining temperature and moisture levels of compost in accordance with AS4454.
Storing and shredding of treated power poles and blue	Dust	• Existing licence conditions relating to dust to apply to new activities; • Expanding perimeter ring main, free standing sprinkler system to all areas and stockpiles at the Premises.

Sources	Emission	Proposed controls/Existing conditions
pine treated timber	Potentially Contaminated Stormwater due to interaction with residual matter on stockpiled material	• Existing licence conditions relating to infrastructure controls: Limestone hardstand, stormwater catchment basin HDPE lined with sediment trap (including 0.5m freeboard), perimeter bund wall with height markers; • Compacted limestone hardstand for new stockpiles/processing areas; • Extend perimeter bunding around new hardstand areas; • Increase height of bunding around the settlement pond area to the same height as the stormwater pond wall; • Power poles stored separately until confirmation that they meet Class 1 waste; • Non-CCA power poles tested for chromium, copper, and arsenic, if levels are above contaminated sites thresholds then they will be removed offsite; • If testing deems the poles suitable as LWCWD guideline Class 1 then shredded and added to mulch; • Compacted limestone hardstands for new stockpiles/processing areas; • Extend perimeter bunding around new hardstand areas; • Increase height of bunding around the settlement pond area to the same height as the stormwater pond wall.
	Unintended fire within the Premises and contaminants in smoke from treated timber	• Existing licence conditions relating to moisture and temperature requirements for storage of greenwaste to prevent spontaneous combustion; • Existing licence condition relating to maintenance of firefighting equipment and access around stockpiles; • Expanding perimeter ring main, free standing sprinkler system to all areas and stockpiles at the Premises; • Storing power poles separately from other stockpiles until confirmed to be Class 1 waste; • Wetting down stockpiles; • Stockpile height not to exceed 6 metres.
Sale of final compost product	Contaminants	• The Licence Holder proposes to comply with AS 4454 including contaminant limits for compost products.
	Contaminants from treated timber	• The Licence Holder proposes to only accept power poles that are not treated with CCA; • The Licence Holder considers that treated timber feedstock types are easily identifiable due to the numbers stamped on the poles; • The Licence Holder proposes to only accept blue pine timber offcuts and pallets that are marked with preservation codes 70, 73, 74, and 75; • The Licence Holder proposes testing of samples of final product to meet the LWCWD guideline (class 1).

6. 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).

6.1 Emissions, pathways, and receptors

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. This section will outline the emissions, pathways and receptors relevant to the proposed amendments to the Licence.

6.1.1 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 4 in the risk assessment. The key emissions considered in during Premises construction and operation are potentially contaminated stormwater and leachate, fire/smoke, odour, noise and dust.

6.1.2 Pathways

As potentially contaminated stormwater is considered as a potential emission, average yearly rainfall and site topography have been considered.

Using information available on the Bureau of Meteorology's website, the closest available weather station for climate data is the Wanneroo weather station (No. 009105), located 4.8 km from Neerabup. Based on the climate data for Wanneroo weather station (1906 to 2018), the average total annual rainfall is 795.8 mm, with the previous years (2018) total rainfall being 733.0 mm.

Topographic contours of the WA Groundwater Atlas indicate that the Premises topography slopes downwards from south to north, with relative ground levels ranging from 65 m AHD in the south to 61 m AHD in the north. The surface geology consists of Tamala Limestone.

As potentially contaminated stormwater and leachate have the capacity to infiltrate groundwater, groundwater conditions for the Premises have been considered.

Groundwater is considered to flow in a westerly direction throughout the Neerabup area. The depth from ground level to the water table is 27.5 m, with the water table located at 36.5 m relative to the AHD. Groundwater is considered fresh with Total Dissolved Solids (TDS) of 250-500 mg/L. The Premises is not located within a Public Drinking Water Source Area. Groundwater conditions are defined in information available in the Perth Groundwater Atlas (Department of Water, 2004; as updated from time to time). A communal groundwater extraction system is located within 190 Flynn Drive, with the bore water supplying all businesses on the greater property.

As dust, odour and noise are also considered potential emissions, the prevailing wind speeds and direction have been considered.

The Pinjar Tower weather station is located 3.4 km North West of the Premises. The station measures wind speed and direction at a height of 25 m above ground level. Using the Pinjar Tower's information available through the Department of Primary Industries and Regional Development over the 2018-2019 period, the area has an average wind speed of 19.5 km/h with an average maximum wind speed of 108 km/hr. Primary wind direction in the area is ES - E (morning) and NE (afternoon). These pathways have been considered in Table 4.

6.1.3 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)) and Figure 4 provides the distances to the sensitive receptors.

Table 3: Sensitive human and environmental receptors and distance

Human receptors	**Distance from activity / prescribed Premises**
Neighbouring lessees within Lot 190 Flynn Drive	Immediately adjacent.
Residential Properties	600 m south of Premises.
Wanneroo Golf Club	1300 m east of Premises.
Potential down-gradient groundwater users (non-potable users within industrial area)	Multiple present to the west and north-west of the Premises (Water Information Reporting (WIR) System, DWER). Closest groundwater bores - west 980 m.
Environmental receptors	**Distance from activity / prescribed Premises**
Conservation Reserve (Mather St) management orders with City of Wanneroo.	Immediately adjacent to Lot 190 boundary west.
Groundwater	RIWI Proclaimed - underlying groundwater (non-potable purposes) Superficial Aquifer underlying the prescribed premises. Flows in a westerly direction. Depth to water table is 27.5 m and 36.5 m AHD.
Threatened Ecological Communities and Priority Ecological Communities	The Premises is within the 500 m buffer area for: • Banksia Dominated Woodlands of the Swan Coastal Plain (P3 PEC/ Endangered TEC); • *Banksia attenuata* woodlands over species rich dense shrublands (Endangered PEC/ Endangered TEC)
Bush Forever	Approximately 400 m west of Premises boundary: • Flynn Drive Bushland, Neerabup (site number 295); • Description: Low Woodland to Low Open Forest dominated by *Banksia attenuata* and *B. menziesii* with scattered to co-dominant *Eucalyptus todtiana* and *E. marginata*

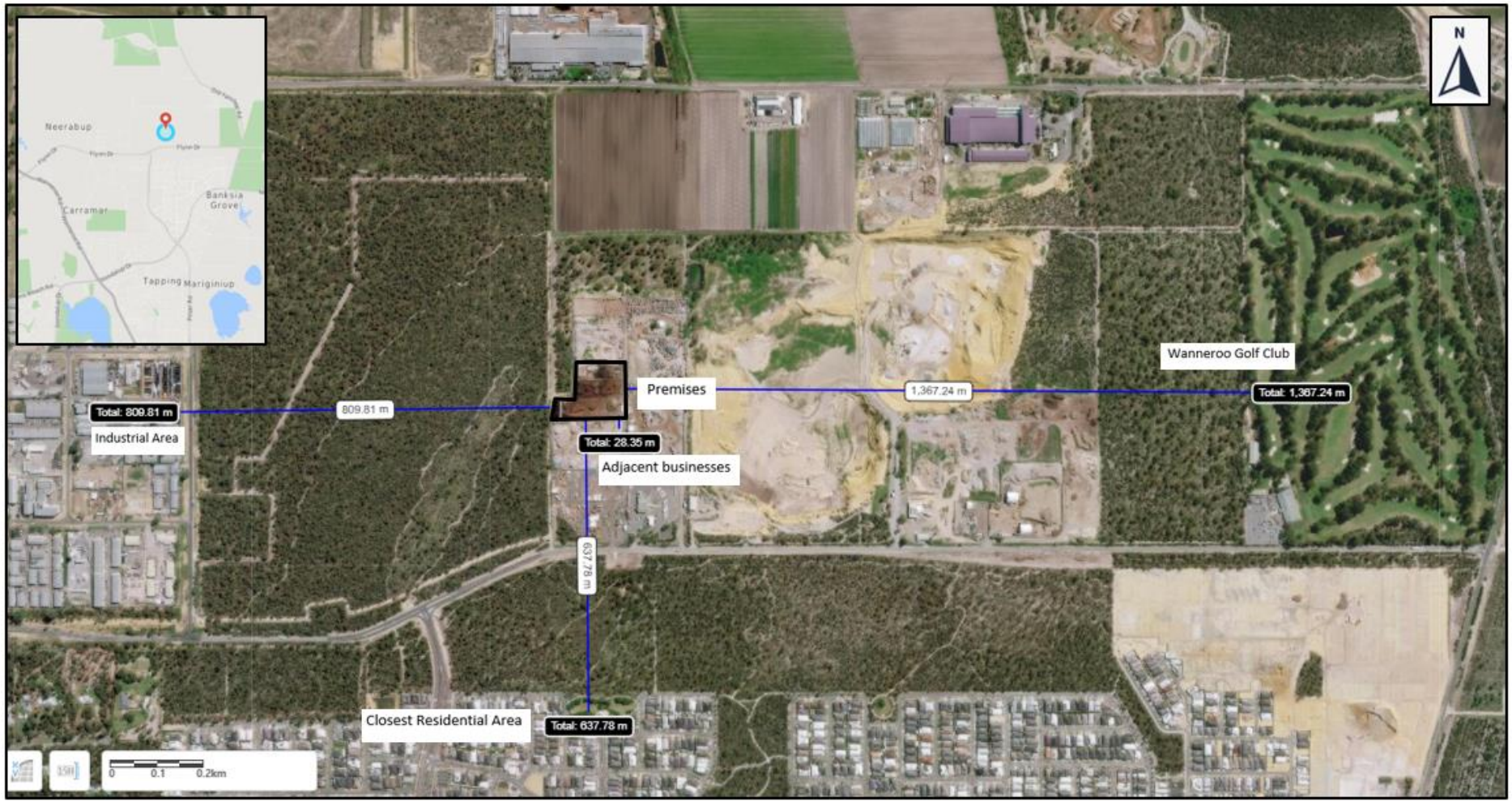

Figure 4: Distance to sensitive receptors

6.2 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 6.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls 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 L9008/2016/1 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 4: Risk assessment of potential emissions and discharges

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Operation								
Category 13 Activities								
Screening, crushing, shredding, unloading, loading and storage of construction / demolition waste **Vehicle movements**	Dust	Air/windborne pathway causing impacts to health and amenity	Neighbouring industries within 190 Flynn Drive Residential properties 600 m south of Premises.	Refer to Table 2	C = Minor L = Rare **Low Risk**	Y	Condition 1, Table 1 Condition 14	The Delegated Officer considers the risks associated with dust emissions associated with the proposed activities and potential to cause impacts to health and amenity is low. The Licence Holder's proposed controls have been formalised as licence conditions by the Department. These controls are considered to minimise the risk of dust being released into the air.
	Noise	Air/windborne pathway causing impacts to health and amenity	Residential properties 600 m south of Premises.	Refer to Table 2	C = Minor L = Rare **Low Risk**	Y	Condition 1, Table 1	The Licence Holder is required to comply with the *Environmental Protection (Noise) Regulations 1997.*
	Asbestos fibres from non-conforming waste types being released into the air	Air/windborne pathway causing impacts to health	Neighbouring lessees within Lot 190 Flynn Drive Residential properties 600 m south of Premises.	Refer to Table 2	C = Severe L = Unlikely **High Risk**	N	**Condition 4** **Condition 5** **Condition 6** **Condition 7** **Condition 8** **Condition 9 (a) (b) (c)** **Condition 10, 11 and 12**	The Delegated Officer notes that the controls specified in the Asbestos Management Plan (AMP) provided by the Licence Holder only specifies visual inspection for asbestos and the installation of signage at the Premises. This is not considered to meet the minimum requirements of an AMP as described in the *Guideline for managing asbestos at construction and demolition waste recycling facilities* (DER, 2012), nor to mitigate the risks associated with the acceptance of construction and demolition waste for asbestos. Regulatory controls relating to the management of asbestos have been included in the amended Licence. These controls are considered to minimise the risk of asbestos fibres from non-conforming waste types to nearby receptors.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
	Contaminated stormwater due to interaction with residual matter on stockpiled material	Overland runoff potentially causing impacts to soil and vegetation	Conservation Reserve (Mather St) management orders with City of Wanneroo. Neighbouring lessees within Lot 190 Flynn Drive	Refer to Table 2	C = Minor L = Unlikely **Medium Risk**	N	Condition 1, **Table 1** Condition 13, Table 3	The Delegated Officer notes that while the addition of lease area 5 and 9 to the premises has increased the catchment size, the size of the stormwater dam is still considered adequate to manage and contain surface water flows. The Delegated Officer considers however, that in order to ensure surface water runoff is managed appropriately, a condition requiring the sediment trap, located at the entrance to the stormwater dam, to be regularly inspected, cleaned, and maintained free of accumulated sludge has been added to the licence. The Delegated Officer also notes that the existing Licence conditions regarding freeboard management for the stormwater dam will be required for the ongoing management of stormwater and have been retained in the Licence.
	Leachate	Seepage through infrastructure and underlying soils to groundwater causing deterioration of local water quality	Down-gradient non-potable groundwater users – Closest groundwater bore is 980 m west	Refer to Table 2	C = Minor L = Unlikely **Medium Risk**	N		

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Category 61A Activities								
Proposed treated timber activities – blue pine								
Acceptance, shredding and storage of blue pine treated timber	Dust	Air/windborne pathway causing impacts to health and amenity	Neighbouring lessees within Lot 190 Flynn Drive. Residential properties 600 m south of Premises.	Refer to Table 2	C = Moderate L = Possible **Medium Risk**	N	**Not Conditioned**	The Delegated Officer notes the only proposed use for the treated timber is as a feedstock for compost. The Delegated Officer has determined that the risks of adding this feedstock to compost for offsite use is unacceptable (risk assessed separately below). The Department does not consider wood and wood derived wastes impregnated with preservatives or pesticides to be a suitable feedstock for composting due to the risk to human and environmental health. Therefore, the Department considers that this feedstock should not be accepted onto the Premises.
	Contaminated stormwater due to interaction with treated timber and power poles	Release of contaminants to land	Adjacent bushland and neighbouring industries.	Refer to Table 2	C = Moderate L = Possible **Medium Risk**	N	**Not Conditioned**	
	Leachate	Seepage through infrastructure and underlying soils to groundwater causing deterioration of local water quality	Down-gradient non-potable groundwater users – Closest groundwater bore is 980m west	Refer to Table 2	C = Moderate L = Possible **Medium Risk**	N	**Not Conditioned**	

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Neighbouring lessees within Lot 190 Flynn Drive and residential properties 600 m south of Premises. Adjacent bushland and associated ecological communities	Refer to Table 2	C = Major L = Unlikely **Medium Risk**	N	**Not Conditioned**	
Proposed treated timber activities – power poles								
Acceptance, shredding and storage of treated power poles	Dust	Air/windborne pathway causing impacts to health and amenity	Neighbouring lessees within Lot 190 Flynn Drive. Residential properties 600 m south of Premises.	Refer to Table 2	C = Major L = Possible **High**	N	**Not Conditioned**	The Delegated Officer notes the only proposed use for the power poles is as a feedstock for compost. The Delegated Officer has determined that the risks of adding this feedstock to compost for offsite use is unacceptable (risk assessed separately below). The Department does not consider wood and wood derived wastes impregnated with preservatives or pesticides to be a suitable feedstock for composting due to the risk to human and environmental health. The Delegated Officer therefore considers that this feedstock should not be accepted onto the Premises. The Delegated Officer has also determined that the infrastructure on site is not suitable for storage of treated power poles. Noting that power poles can be considered as contaminated solid waste (up to and including Class IV and Class V contamination levels as per the LWCWD), the Premises is not considered to contain suitable infrastructure to facilitate the temporary storage of this
	Contaminated stormwater due to interaction with treated timber and power poles	Release of contaminants to land	Adjacent bushland and neighbouring industries.	Refer to Table 2	C = Major L = Possible **High**	N	**Not Conditioned**	

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
	Leachate	Seepage through infrastructure and underlying soils to groundwater causing deterioration of local water quality	Down-gradient non-potable groundwater users – Closest groundwater bore is 980m west	Refer to Table 2	C = Major L = Possible **High**	N	**Not Conditioned**	category of waste.
	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Neighbouring lessees within Lot 190 Flynn Drive. Residential properties 600 m south of Premises. Adjacent bushland and associated ecological communities.	Refer to Table 2	C = Major L = Possible **High**	N	**Not Conditioned**	As above
Category 67A activities								
Composting, blending and storage of greenwaste, soil blends, mulch and landscape mixtures. **(Greenwaste only)**	Odour	Air/windborne pathway causing impacts to amenity	Neighbouring industries within 190 Flynn Drive Residential properties 600 m south of Premises.	Refer to Table 2	C = Minor L = Possible **Low Risk**	N	Condition 1, Table 1 Condition 2, Table 2 Condition 3 Condition 11, Table 3 Condition 17 Condition 18	The storage and decomposition of organic wastes have the potential to generate odour emissions. The generation of odour is likely to occur due to formation of anaerobic conditions within larger stockpiles, or in stockpiles that are not adequately monitored, and managed to prevent formation of anaerobic conditions. Noting that only greenwaste will be accepted as a feedstock, the licence holder's proposed controls are considered adequate and will be formalised within conditions of the Licence.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Composting, blending and storage of greenwaste, soil blends, mulch and landscape mixtures. **(Greenwaste only)**	Dust	Air/windborne pathway causing impacts to amenity	Neighbouring industries within 190 Flynn Drive Residential properties 600 m south of Premises	Refer to Table 2	C = Minor L = Rare **Low Risk**	Y	Condition 1, Table 1 Condition 2, Table 2 Condition 3 Condition 11, Table 3 Condition 14	Composting activities have the potential to generate dust emissions. Dust emissions could also be generated through truck and vehicles arriving/leaving the Premises. Dust lift off can occur in stockpiles that are not maintained in a damp state. The Delegated Officer considers that the Licence Holder's proposed controls are likely to be sufficient to manage dust emissions and have been formalised as conditions within the Licence.
	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Neighbouring industries within 190 Flynn Drive. Residential properties 600 m south of Premises. Adjacent bushland and associated ecological communities	Refer to Table 2	C = Moderate L = Unlikely **Medium**	N	Condition 1, Table 1 Condition 2, Table 2 Condition 3 Condition 11, Table 3 **Condition 12** **Condition 13** **Condition 15** **Condition 16** **Condition 17** **Condition 18**	Fires can cause impacts to air, water and land quality, including destruction of native vegetation, fauna and property. Fire events can also cause amenity impacts and severe consequences to human health. Adverse impacts from fires can be mitigated by preventing fires occurring through appropriate operational and management controls. Implementation of appropriate fire response procedures and firefighting equipment are also considered important controls to reduce the impact of any fires which do occur. The storage of combustible materials, which may include feedstocks, materials undergoing composting, residual physical contaminants, and finished compost product, as well as the spontaneous combustion of stockpiles (due to elevated internal temperatures) are the main factors considered to contribute to potential fire risk. The Delegated Officer considers that controls relating to the management of compost and feedstock stockpiles (including processing compost, stockpile size and separation) are likely to be sufficient to manage these risks and have been added to the Licence as regulatory controls. These controls mitigate both the risk of fire occurring at the Premises, the intensity of a fire should one ignite, and measures associated with extinguishing a fire.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Composting, blending and storage of greenwaste, soil blends, mulch and landscape mixtures. **(Greenwaste only)**	Leachate	Seepage through infrastructure and underlying soils to groundwater causing deterioration of local water quality	Down-gradient non-potable groundwater users – Closest groundwater bore is 980 m west.	Refer to Table 2	C = Moderate L = Unlikely **Medium Risk**	N	Condition 1, Table 1 Condition 2, Table 2 Condition 3 Condition 11, Table 3 **Condition 12** **Condition 13** **Condition 16** **Condition 18**	The decomposition and breakdown of waste, along with the interaction between stormwater and stockpiles is a key source of leachate generation during: • Feedstock acceptance, decontamination, handling and storage; • Feedstock processing; and • Composting in stockpiles. The Delegated Officer considers that in order to ensure that the catchment adequately drains to the storage dam, conditions regarding composting location, leachate re-use, stormwater runoff collection, sediment trap maintenance, hardstand maintenance and compost monitoring have been added to the Licence.
	Contaminated stormwater due to interaction with organic material.	Surface water run-off due to interaction of stormwater and stockpiles	Adjacent bushland and neighbouring industries	Refer to Table 2	C = Moderate L = Unlikely **Medium Risk**			
	Pathogens and contaminants	Direct contact with product causing impacts to human health.	Offsite human receptors.	Refer to Table 2	C = Minor L = Unlikely **Low Risk**	Y	Condition 1, Table 1 Condition 2, Table 2 Condition 3 Condition 11, Table 3 Condition 16 Condition 17 Condition 18	The Licence Holder has proposed that compost products will comply with AS 4454-2012. Pasteurisation is an important part of the active composting phase during which the number of plant and animal pathogens (organisms responsible for diseases) and plant pests and propagules (viable regenerative plant materials or seeds) are significantly reduced. Pasteurisation of greenwaste should be sufficient to ensure that pathogens and contaminates are not present in the final product. The Delegated Officer considers that the controls proposed by the Licence Holder are likely to be sufficient in managing pathogens and contaminations and have been formalised as conditions within the Licence.
		Direct application to land causing detrimental impacts to soil and vegetation health.	Offsite environmental receptors					

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Composting, blending and storage of composting products, soil blends, mulch and landscape mixtures. **(with the inclusion of treated power poles)**	Contaminants within product from treated timber power poles feedstock Contaminant content of compost product causing product to be unfit for market.	Human contact with compost that may contain contaminants	Onsite and offsite human and environmental receptors.	Refer to Table 2	C = Major L = Possible **High**	N	**<u>Not conditioned</u>**	Composting products have the potential to contain contaminants which may contaminate the premises of product users and cause health impacts to humans who encounter the compost, including sensitive areas such as residential gardens, horticulture sites, parks and native vegetation rehabilitation areas. The Licence Holder has proposed the inclusion of power poles as a feedstock for composting products manufactured on site. As detailed in section 4, treated power poles in Western Australia have historically been chemically treated in a number of ways and can contain a variety of contaminants, at varying concentrations. The Delegated Officer has reviewed the information regarding the proposal for compost product containing power poles as a feedstock and has determined that: 1. The Licence Holder has not demonstrated a compost product made with power poles will be fit for purpose; 2. The Licence Holder has not demonstrated how the compost manufactured with treated power poles will meet AS 4454-2012 standards, as proposed within the application; and 3. The uncertainty regarding power poles and their level of treatment within the composting process presents a risk of contaminants being present within the final compost product(s). Noting the above, the Delegated Officer considers that the inclusion of power poles within compost presents an unacceptable risk and therefore does not consider power poles to be a suitable a feedstock for compost.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of amended licence	Justification for regulatory controls/ Additional Information
Source Activities	**Potential emission**	**pathways and impact**	**Receptors**	**Licence Holder's controls**				
Composting, blending and storage of composting products, soil blends, mulch and landscape mixtures. **(with the inclusion of blue pine treated timber)**	Contaminants within product from blue pine treated timber feedstock Contaminant content of compost product causing product to be unfit for market.	Human contact with compost that may contain contaminants	Onsite and offsite human and environmental receptors.	Refer to Table 2	C = Major L = Possible **High**	N	**<u>Not conditioned</u>**	Composting products have the potential to contain contaminants which may contaminate the Premises of product users and cause health impacts to humans who encounter the compost, including sensitive areas such as residential gardens, horticulture sites, parks and native vegetation rehabilitation areas The Licence Holder has proposed the inclusion of blue pine treated timber as a feedstock for composting products manufactured on site. The Delegated Officer has reviewed the information regarding compost product containing blue pine treated timber as a feedstock and found that: 1. The Licence Holder has not demonstrated a compost product made with blue pine will be fit for purpose, nor provided fit for intended purpose product assessments; 2. Contaminant thresholds for Bifenthrin and Permethrin (blue pine preservative code numbers 70, 73, 74, and 75) are not established within AS 4454-2012; 3. The Licence Holder has not demonstrated how the compost manufactured with blue pine treated timber will meet AS 4454-2012 standards, as proposed within the application; and 4. The uncertainty regarding blue pine treated timber and their level of treatment within the composting process presents a risk of Bifenthrin and Permethrin being present within the final compost product(s). Noting the above, the Delegated Officer considers that the inclusion of blue pine treated timbers within compost presents an unacceptable risk and therefore does not consider blue pine treated timbers be a suitable a feedstock for compost.

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. **<u>Bold and underline text</u>** depicts additional regulatory controls imposed by Department.

7. 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 20/08/2020 for licence application;	None received	N/A
Local Government Authority (City of Wanneroo (The City)) advised of proposal 22/09/2020	The City has advised that the closest City of Wanneroo District Planning Scheme Number 2 (DPS 2) category to the proposed activities is Industry – General. The City advises that the area is zoned for Industry – General, and that the landowner has an existing development approval until 2 December 2025.	The Delegated Officer has noted that the Premises has development approval until 2 December 2025 and the proposed activities relate to Industry – General zoning.
	The City advises DWER to take into consideration of potential spread of disease or contamination risks to others, on site stockpiled materials through wind and drainage, and amenity impacts on nearby residential areas	The Delegated Officer has considered source-pathway-receptor linkages in the risk assessment. Where required, conditions have been drafted to reduce the risk.
The Licence Holder was provided with draft amendment on 5 March 2021	Refer to Appendix 1	Refer to Appendix 1

8. Conclusion

Based on the assessment, it has been determined that an amended Licence will be granted subject to conditions commensurate with the determined controls and as necessary for administration and reporting requirements.

The amended licence will authorise the alteration to the premises boundary, the acceptance of inert waste type 1 and the composting of greenwaste.

The Delegated Officer considers that the existing infrastructure at the Premises is not suitable to store treated power poles, noting that power poles can be considered as contaminated solid waste (up to and including Class IV and Class V contamination levels as per the LWCWD).

Compost containing treated power poles as a feedstock is not authorised in the amended licence. The Delegated Officer has determined that due to the nature of the contaminants within power poles, and their potential impact to receptors, power poles are not considered to be a suitable compost feedstock. Further, as the stated purpose for accepting, storing and shredding treated power poles at the Premises is solely associated with the proposal to use treated power poles as a feedstock for compost, the Delegated Officer considers that these associated

activities (acceptance, storage and shredding) are not consistent with the authorised composting process and not included within the amended licence.

The Delegated Officer has also determined that due to the uncertainty around potential contaminants, the lack of suitable contaminant thresholds and the potential impact on receptors from their use, blue pine treated timber is not considered to be a suitable compost feedstock. Further, as the stated purpose for accepting, storing and shredding blue pine treated timber at the Premises is solely associated with the proposal to use this timber as a feedstock for compost, the Delegated Officer considers that these associated activities (acceptance, storage and shredding) are not consistent with the authorised composting process and not included within the amended licence.

8.1 Licence conversion map

Table 5 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. Condition or table number changes are also recorded in Table 5 below.

Table 5: Licence conversion map

Existing Licence condition/table/ schedule	Condition Summary	Revised Licence condition/table/ schedule/ attachment	Conversion notes
Definitions	n/a	Definitions, Table 6	Definitions moved to the back of the document
Conditions 1 and Table 2	Authorised emissions	Outdated condition and table	Condition and table removed.
Condition 2	waste acceptance and management	No change	No change
Table 3	Waste acceptance table	Table 2	Reduced greenwaste from 25,000 tpa to 20,000 tpa Added clean fill and inert waste type 1
Condition 3	Removal of unauthorised waste	No change	Removed “as soon as practicable” from condition.
Condition 4	Waste processing	Condition 13	Changed reference to Table 4 to Table 3
Table 4	Waste processing table	Table 3	Removed prior to “removal off site” from greenwaste processing Changed reference to Condition 5, Table 5(8) to Condition 1, Table 1 (8) in greenwaste section. Changed reference to condition 6 to condition 16 Added inert waste type 1 and associated waste processing conditions.

Existing Licence condition/table/ schedule	Condition Summary	Revised Licence condition/table/ schedule/ attachment	Conversion notes
Condition 5	Infrastructure and equipment controls	Condition 1	Renumbered only
Table 5	Infrastructure and equipment table	Table 1	Added number 2 (c) maintain sediment trap and 2 (d) inspection and cleaning of sediment trap Added screener and crusher to number 4, and added crushing/ screening to 4 (g)
Condition 6	Visible dust	Condition 16	Renumbered only
Condition 7	Fire controls	Condition 17	Renumbered condition “unauthorised” removed Condition (c) removed.
Condition 8	monitoring	Condition 18	Change reference to Table 6 to Table 4. Renumbered condition
Table 6	Monitoring table	Table 4	renumbered Changed table name to monitoring of inputs and outputs Updated to current format Added relevant waste types
Condition 9	Monitoring of greenwaste	N/A	Removed from licence, no longer relevant, as covered under new Table 4
Table 7	Stockpile monitoring	Table 5	Renumbered Added composting monitoring requirements
Condition 10	Auditable books	Condition 21	Renumbered Added ‘material change’ to (f)
Condition 11	Recording complaints	Condition 22	Renumbered only, changed reference to updated conditions
Condition 12	Compliance report	Condition 23	removed and replaced with condition 23 – updated format
Condition 13	Comply timeframe	Condition 24	Renumbered only

Existing Licence condition/table/ schedule	Condition Summary	Revised Licence condition/table/ schedule/ attachment	Conversion notes
Schedule 1	Premises map	Schedule 1	Replaced with updated map from Licence Holder supplied as part of draft review
	Premises boundary	Schedule 2	Renumbered to Schedule 2 Updated coordinates to include new lease areas, added GDA zone 50.

8.2 Summary of additional conditions

Table 6: Summary of additional conditions

Licence condition/table/schedule	Condition Summary
Prescribed Premises category description	Added category 67A and category 13 to front page of Licence.
Table 1 (2) (c)	Sediment trap must be maintained free of accumulated sludge. - Included with Licence to manage risks associated stormwater runoff.
Table 1 (2) (d)	Sediment trap must be inspected weekly and cleaned out as required (minimum of once a month). - Included within Licence to manage risks associated stormwater runoff.
Table 1 (3)	Added 'hardstand' to perimeter bund wall - Included within Licence to manage risks associated stormwater runoff.
Table 1 (4)	Included screener and crusher with operational requirements for the shredder - This equipment requires the same controls regarding maintenance and dust suppression.
Condition 4	The Licence Holder must not accept waste onto the premises where it contains, or is suspected to contain, visible asbestos or ACM. - Standard condition associated with C&D waste crushing activities
Condition 5	The Licence Holder must maintain clear visible signage specifying "No Asbestos" at all entries to the premises. - Standard condition associated with C&D waste crushing activities
Condition 6	The Licence Holder must obtain a signed declaration from the supplier of the waste with each delivery that:

Licence condition/table/schedule	Condition Summary
	(a) specifies the details of the: (i) waste (type and description); (ii) source of the waste load; (iii) name of the waste carrier; (iv) registration number of the delivery vehicle; and (v) date of delivery; (b) sets out the quantity being delivered; and (c) declares that the load does not contain any asbestos or ACM. - Standard condition associated with C&D waste crushing activities
Condition 7	The Licence Holder must: (a) visually inspect all loads of waste on arrival at the premises prior to acceptance, to determine the risk of a load containing asbestos and/or ACM; and (b) classify each load as either a 'low risk load' or a 'high risk load', in accordance with the risk classification procedure provided in Schedule 3. - Standard condition associated with C&D waste crushing activities
Condition 8	Upon acceptance of the waste, the Licence Holder must direct each classified load to an unloading area designed and constructed to ensure the classified load will not mix with other waste prior to further inspection. - Standard condition associated with C&D waste crushing activities
Condition 9	The Licence Holder must: a) visually inspect each 'low risk load' while the material is being unloaded, and continue to do so at all stages of the storage, sorting, and screening process, to determine whether any asbestos and/or ACM can be identified; b) where asbestos and/or ACM is suspected or identified in a 'low risk load', reclassify that load as a 'high risk load'; and c) visually inspect and handle each 'high risk load' in accordance with the procedure provided in Schedule 3 - Standard condition associated with C&D waste crushing activities
Condition 10	The Licence Holder must ensure that testing of all Products is undertaken in accordance with the Product testing procedures specified in Schedule 4. - Standard condition associated with C&D waste crushing activities
Condition 11	The Licence Holder must ensure that Products are only supplied to customers where they have been tested in accordance with Condition 10 and shown to conform with the product specification of 0.001% Asbestos weight for weight (w/w) for Asbestos content (in any form) within any recycled Products.

Licence condition/table/schedule	Condition Summary
	- Standard condition associated with C&D waste crushing activities
Condition 12	The Licence Holder must maintain accurate and auditable records of all loads that have been inspected and suspected or found to contain asbestos and/or ACM showing the source (person) and originating site (location), and actions taken to address the issue with the source of the load - Standard condition associated with C&D waste crushing activities
Table 3	Acceptance, storage and processing of inert waste type 1 and clean fill. Condition updated to reflect amended waste acceptance and processing.
Condition 19	The Licence Holder must ensure that products are classified according to the product specification and end use(s) as determined by the physical and chemical quality specifications outlined in AS4454 prior to distribution or sale to customers. Condition included to manage compost activities.
Condition 20	The Licence Holder must undertake the monitoring in Table 5 according to the specifications in that table. - Standard condition that ensures monitoring is undertaken in accordance with the monitoring table.
Condition 23	23. The licence holder must: (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and (b) prepare and submit to the CEO by no later than 30 days after the end of that annual period an Annual Audit Compliance Report in the approved form. Standard condition that replaces old outdated Condition 12.
Schedule 3	Asbestos risk classification procedure - Standard condition associated with C&D waste crushing activities
Schedule 4	Asbestos monitoring and testing - Standard condition associated with C&D waste crushing activities

9. Key Documents

1. APVMA 2005, *Report of review findings and regulatory outcomes summary report* Australian Pesticides and Veterinary Medicines Authority, Canberra, Australia.
2. AS 5605 2007, Australian Standard AS5605 *Guide to the safe use of preservative-treated timber*
3. AS 4454 2012, Australian Standard AS 4454 *Composts, soil conditioners and mulches*
4. Department of Environment Regulation (DER) 2016, *Guidance Statement: Environmental Siting*, Perth, Western Australia.
5. DER 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
6. DER 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
7. DER 2019, *Landfill Classification and Waste Classification Definitions 1996 (as amended 2019)*
8. DWER 2019, *Industry Regulation - Guide to licensing*
9. DER 2012, *Guideline for managing asbestos at construction and demolition waste recycling facilities*
10. EPA NSW 2017, EPA New South Wales *Treated Timber Regulation and Standards,* August 2017, Government of New South Wales.

Appendix 1: Summary of Licence Holder's comments

Summary of Licence Holder's comment	Department's response
New site layout map provided to exclude treated timber and power pole storage.	The Department has incorporated the new site layout map into the new Licence. Note: the proposed layout as part of this report remains as this is what was assessed.
Licence Holder is unable to provide an updated fire management plan, the Licence Holder notes the proposed removal of the fire management plan, and recommends it is retained until they are able to provide it.	The Department has retained the condition requiring the provision of the fire management plan, however has reduced the required submission date to be within three months of the date of the amendment.

Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY					
Application type					
Amendment to licence	☒	Current licence number:	L9008/2016/1		
		Relevant works approval number:		N/A	☒
Date application received		22/06/2020			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Community Greenwaste Recycling Pty Ltd			
Premises name		Community Greenwaste			
Premises location		Part of Lot 5 on Diagram 91435 (190 Flynn Drive, Neerabup)			
Local Government Authority		City of Wanneroo			
Application documents					
HPCM file reference number:		DER2016002200-1			
Key application documents (additional to application form):		Attachment 1A: Lease Agreement Attachment 2: Premises Map and Prescribed Boundary Attachment 3: Categories, throughputs, and controlled waste			
Scope of application/assessment					
Summary of proposed activities or changes to existing operations.		Licence amendment - change to prescribed Premises boundary to add lease areas 5 and 9 to existing Lease area 7. Add category 13 and 67A to current 61A Licence Throughputs greenwaste 20,000 tpa, inert waste 15,000 tpa and wood 15,000 tpa. Wanting to accept power poles. Controlled waste trigger.			

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 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.	Assessed – greenwaste only 25,000 tpa	Additional wood waste, 15,000 tpa Inert waste 15,000 tpa Green waste 20,000 tpa? Does this mean in addition to the existing 25,000 tpa they are licensed
Category 13: Crushing of building material: Premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned.		

Category 67A: Compost manufacturing and soil blending: Premises on which organic material		

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: 30/06/2021 – Lease Area 7 and 9 only. Does not demonstrate occupancy for Lease area 5 but has applied for lease area 5. RFI Mining lease / tenement ☐ Expiry: Other evidence ☐ Expiry:
Has the applicant obtained all relevant planning approvals?	Yes ☒ No ☐ N/A ☐	Approval: Planning Approval Expiry date: 2 December 2025.
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 179117 Groundwater Licence Issued to Alvito Pty Ltd (Lessor) expires 31 January 2027. Licence allocation total of 30,000kL per annum.

Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes ☐ No ☐	Name: Wanneroo Groundwater Area Type: RIWI Proclaimed Groundwater Area Has Regulatory Services (Water) been consulted? Yes ☐ No ☒ N/A ☐ Regional office: Swan Avon
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes ☐ No ☒	Name: N/A Priority: 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* *Environmental Protection (Noise) Regulations 1997* *Environmental Protection (Unauthorised Discharge) Regulations 2004.* *Planning and Development Act 2005 – Planning Approval.* *DA2014/2422 Planning Approval is for Industry General (Storage and Sorting)*
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 ☒	The area immediately adjacent to this to the west (conservation reserve) is classified as decontaminated. Date of classification: 2018.