



Application for Licence

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

Licence Number	L9011/2016/2
Applicant	Alkina Holdings Pty Ltd
ACN	124 202 491
File Number	DER2016/002034
Premises	<p>Alkina Postans Road Facility 243 Postans Road</p> <p>Legal description Part Lot 569 on Plan 3475 under certificate of title 289 folio 158 HOPE VALLEY WA 6167 As defined by the Premises map in schedule 1 of the licence.</p>
Date of Report	11 November 2021
Proposed Decision	Licence granted

Neville Welsh
Senior Industry Regulation Officer

An officer delegated by the CEO under section 20 of the EP Act

1. Application summary

On 23 June 2021, Alkina Holdings Pty Ltd (licence holder) applied to renew the licence L9011/2016/1 for Alkina Postans Road facility is due to expire on 15 November 2021. The Premises is located 6km north of the City of Kwinana. The licence relates to prescribed premises categories as described below in Table 1 with the primary activity being category 62 (solid waste depot) under schedule 1 of the *Environmental Protection Regulations 1987*.

Table 1: Premises category description and production design capacity

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Assessed production / design capacity
Category 62: Solid waste depot	150,000 tonnes per annual period

Alkina Holdings Pty Ltd (Alkina) operates a mixed waste recycling facility (the Facility) at 243 Postans Road, Hope Valley (Being part Lot 569, on Plan 3475). Lot 569 is owned by Lunard Pty Ltd (Lunard) which, trading as Stoneridge Quarries WA, operates under Licence L9133/2018/1 (Categories 12, 13, 61A and 77 of Schedule 1 of the *Environmental Protection Regulations 1987*). Alkina operates on an excised portion of Stoneridge's quarry site.

Alkina receives waste predominantly from its own related waste collection business (Instant Waste Management) as well as minor quantities from other commercial waste companies. The waste is sourced from commercial and industrial sources, construction and demolition sites including residential clean ups. No municipal solid waste (kerbside collection) is accepted at the Facility.

Waste material is inspected with an excavator to examine waste for conformance with Alkina's standard operating procedures (no food waste, asbestos, liquid waste or other problematic waste materials). The excavator also removes large recoverable materials such as steel, timber, carpet and furniture.

A vibrating screen is used to screen and separate sand and rubble (bricks, concrete). Two radial stackers are used to stockpile sand and rubble material. Alkina provides Stoneridge with recovered sand and rubble for use at their premises for further processing activities covered by Licence L9133/2018/1. A magnet on the screen removes ferrous metals. A picking station is used to capture non-ferrous metals, wood plastics and cardboard. The reusable and recyclable material is stored separately and subsequently removed to downstream facilities.

The licence holder has a lease with Lunard plus a 48 month planning consent granted by the City of Kwinana on 24 July 2020. The tenure of the replacement licence will be aligned with the planning consent therefore a three year term expiring on 15 November 2024.

The main risks associated with the operation of the concentrator plant include:

- Asbestos fibres and dust becoming airborne from the screening and sorting of construction and demolition (C&D) waste.
- Noise associated with the screening plant, machinery and heavy vehicle equipment.

These emissions will not be reassessed during this replacement licence process.

2. Regulatory framework

The department has determined to undertake an administrative renewal of the licence and has not conducted a full review and risk assessment of emissions and discharges from the premises. The Administrative licence renewal aligns with the Department's *Work Instruction: Regulatory Services, COVID-19 licensing position*.

In replacing the existing licence, 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. Complaints History

There have been no complaints reported to the Department because of the licence holders operations during the last five years.

4. Decision summary

Under the regulatory framework the Delegated Officer has determined to grant the licence L9011/2016/2 without conducting additional risk assessment.

In renewing the licence the Delegated Officer has determined to:

- update the format and appearance of the replacement licence;
- incorporate licence amendment/s issued prior to the replacement licence;
- remove redundant conditions;
- include conditions considered necessary for the effective administration of the licence (i.e. record keeping and reporting requirements);
- Review and include all infrastructure and equipment into condition 1, Table 1: infrastructure and equipment requirements;
- revise licence conditions and consolidate existing pollution control conditions; and,
- correct clerical mistakes and unintentional errors.
- transfer all existing regulatory controls and conditions to the renewed licence.

The replacement licence will be issued for 3 years consistent with the *Guidance Statement on Licence Duration 2016* and in consideration of the planning consent granted by the City of Kwinana.

4.1 Summary of administrative changes

Section 62 of the EP Act provides general power to impose conditions on licences. All licences are issued with conditions as per *Guidance Statement – Setting Conditions* (October 2015) for the purposes of the EP Act to prevent, control, abate or mitigate pollution or environmental harm.

Table 2 summarizes the transfer of all appropriate conditions from the expiring licence into the renewed licence including changes made to licence conditions where required and the rationale for changes made.

Table 2: Licence conditions description and rationale

Existing Condition / table number	Description and Rationale	New Condition number
Cover page	Licence version updated. "Duration", "Date of issue" and title of delegated officer updated.	
Footers	Update the footers on all pages	
Licence History	Include references to W6009/2016/1.	
All	Correct clerical mistakes and unintentional errors.	
1.1.1 to 1.1.4	Redundant conditions deleted from licence because it is addressed by the replacement Licence Interpretation.	Removed

Existing Condition / table number	Description and Rationale	New Condition number
1.2.1. & Table 1.2.1	Renumbered and Licensee replaced by licence holder.	1
1.2.2	Renumbered, Licensee replaced by licence holder and renumber condition reference for waste acceptance criteria	2
1.2.3	Renumbered, Licensee replaced by licence holder and renumber table reference for waste acceptance criteria	3
1.2.4 to 1.2.13	Renumbered and Licensee replaced by licence holder.	4 to 13
1.2.14	Renumbered, Licensee replaced by licence holder and renumber condition reference 1.2.11 to 11.	14
1.2.15	Renumbered, Licensee replaced by licence holder and renumber table reference that describes the waste type	15
1.2.16 to 1.2.18	Renumbered and Licensee replaced by licence holder.	16 to 18
1.2.19	Renumbered, Licensee replaced by licence holder and renumber table reference that describes the infrastructure / equipment and control specification.	19
1.2.20	Renumbered and Licensee replaced by licence holder.	20
1.2.21	Existing licence condition deleted from licence as the Noise Verification Study was received on 28/10/2018 and revision resubmitted on 5/11/2019 and was able to demonstrate compliance with the <i>Environmental Protection Noise Regulations 1997</i> .	Removed
2.1.1	Renumbered, Licensee replaced by licence holder and renumber table reference that describes the infrastructure / equipment and control specification.	21
3.1.1	Existing licence condition replaced with two new standard DWER condition that reflect what records are required to be maintained by the licence holder.	22 & 23
3.1.2	Existing licence condition replaced with new standard DWER Annual Audit Compliance Report condition.	24
3.1.3	Existing Licence condition replaced with new standard DWER complaints management condition.	25
3.2.1	Existing condition renumbered, Licensee replaced by licence holder, renumber the table and remove reference to Noise Verification Study. Also removed reference to N1 form.	26
Definitions	All definitions were reviewed and updated – especially the Annual reporting period timeframe.	Definitions
Schedule 1	Map revised and reference to Stoneridge Licence updated.	Schedule 1
Schedule 2	N1 form deleted from Schedule 2 and replaced with coordinates of the Alkina Holdings Pty Ltd prescribed premises boundary.	Schedule 2

4.2 Additional conditions

The renewed licence has been updated to include standard conditions for recording, complaints and record keeping (condition 22, 23, 24 & 25) in line with DWER's *Guidance Statement – Setting Conditions* 2015.

These are standard conditions allowing for the effective administration of the renewed licence.

5. Consultation

The draft replacement licence and this decision report were provided to the licence holder on 2 November 2021 for comment.

On the 3 November and 4 November 2021, the licence holder replied with comment seeking to change the annual reporting period from 1 July to 30 June annually the following year aligning this licence with the licence holders other approval reporting periods.

The Delegated Officer accepted the change in definition acknowledging the licence holder waiver, and, decided to grant the replacement licence.

6. Conclusion

Based on the assessment in this Decision Report, the Delegated Officer has determined that the renewed licence L9011/2016/2 will be granted. The licence is subject to conditions commensurate with the determined controls as well as conditions necessary for administration and annual reporting requirements.