



Application for Licence Amendment

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

Licence Number	L9127/2018/1
Licence Holder	City of Greater Geraldton
File Number	DER2018/000553-1 and APP-0026083
Premises	Meru Waste Disposal Facility Landfill Road, NARNGULU WA 6532 Legal description - Lot 204 on Plan 403161, Lot 2268 on Plan 250829 and Lot 203 on Plan 403161.
Date of Report	20 December 2024
Decision	Revised licence granted

Manager Waste Industries

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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1. Decision summary

Licence L9127/2018/1 is held by City of Greater Geraldton (Licence Holder) for the Meru waste Disposal Facility (the Premises), located at Lot 204 on Plan 403161, Lot 2268 on Plan 250829 and Lot 203 on Plan 403161.

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 L9127/2018/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Application summary

On 3 May 2024, the Licence Holder submitted an application to the department to amend Licence L9127/2018/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The following amendments are being sought:

- Addition of category 62 – Solid waste depot to the licence to incorporate the new waste transfer station constructed under Works approval W6519/2021/1;
- Increase tyre storage from 1000 to 1500 tyres at any one time;
- Remove specific quantity limitation on class III contaminated solid waste;
- Accept and dispose of special waste type 3;
- Addition of plastic and cardboard baling;
- Remove FOGO composting activities;
- Update groundwater monitoring bore map and monitoring table; and
- Align the licence to existing premise activities, including to:
 - update the address;
 - add the processing shed, stock wash bay and oil tanks;
 - update liquid waste ponds information;

Works approval W6519/2021/1 was previously issued for the construction of a community waste transfer station and the expansion of a FOGO composting pad.

An Environmental Compliance Report for the extension of the composting pad component was submitted on 29 March 2023. Further documentation was submitted on 29 July 2024, demonstrating compliance with works approval W6519/2021/1.

An Environmental Compliance Report for the community waste transfer station was submitted on 8 January 2024, which demonstrated compliance with works approval W6519/2021/1.

2.2.1 Liquid Waste Pond 1

An additional application for the modification of the discharge point of Liquid Waste Pond 1 was received on 31 July 2024. This has been considered as part of this amendment.

The disposal point for Liquid Waste Pond 1 was modified in 2018 as part of works to install a geomembrane liner to replace the clay liner. These included:

- Installation of a 225 mm diameter HDPE outlet pipe in the floor of the disposal point which extends underground through the pond's geomembrane to the lower levels of the pond.
- Reshaping of the internal sump within the disposal point was carried out to enable the flow of liquid waste towards the outlet pipe.

The outlet pipe (and head) has been found to be insufficient to efficiently transfer the liquid waste delivered to the disposal point through to the septage pond. This has resulted in blockages and extended waits time for the liquid waste carriers to empty their loads.

A modification to the discharge outlet of the disposal point is proposed to address these inefficiencies. The modifications will include:

- Increasing the pipe diameter from 225mm to 450mm;
- Raise the pipe from under ground to an above ground pipe; and
- Above ground pipe will have a fall of 1% to allow waste discharged at the facility to flow into the lined pond.

The modifications will deliver the septage waste above the level of the pond via the new 450 mm diameter discharge pipe, as opposed to the current delivery arrangement beneath the surface of the pond with a fall rate of 2% to allow for the liquid waste to discharge in the lined pond. The new pipeline still discharges to the base of the pond, below the surface water level so as not to disturb any anaerobic crust.

Table 1 below outlines the proposed throughput capacity changes to the existing Licence.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
Cat 13: Crushing of building material	20,000 tonnes/year	50,000 tonnes/year	The Licence holder requests to increase the crushing and screening of C&D waste from 20,000 to 50,000 tonnes per annual period.
Category 57: Used tyre storage (general)	1,000 tyres	1,500 tyres	The Licence holder requests to increase the used tyre storage throughput capacity from 1,000 to 1,500 used tyres at any one time.
Category 61A: Solid waste facility	100,000 tonnes/year	20,000 tonnes/year	Contaminated solid waste to be removed from category 61A and added to category 64.
Category 62: Solid waste depot	Nil	20,000 tonnes per annual period	New category proposed due to the operation of the new waste transfer station constructed under Works approval W6519/2021/1.

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 *Guideline: Risk assessments* (DWER 2020).

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

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

Sources	Emission	Potential pathways	Proposed controls
<p>Acceptance, storage and handling of waste in the transfer station prior to disposal off-site</p> <p>Acceptance and storage of liquid wastes prior to disposal off-site</p> <p>Acceptance and disposal of Special waste type 3</p>	Waste and leachate	Direct discharge to soil, and seepage through soil into groundwater	<p>Existing controls previously assessed under Works Approval W6519/2021/1.</p> <p>The Existing Licence includes various controls for the mitigation of waste and leachate emissions.</p> <p>The acceptance and disposal of Special waste type 3 is limited to meeting the acceptance criteria for single composite lined landfills as specified in <i>PFAS National Environmental Management Plan 2.0</i> (HEPA, 2020) and the acceptance criteria for Class III landfills as specified in the Landfill Definitions for contaminants other than PFAS.</p> <p>Special waste type 3 to only be disposed of in Class III cells.</p>
Acceptance of liquid wastes through the new pond discharge point	Leachate	Direct discharge to soil, and seepage through soil into groundwater	<p>Modification to the discharge outlet of the disposal point is limited to:</p> <ul style="list-style-type: none"> Increasing the pipe diameter from 225mm to 450mm; Raising the pipe from under ground to an above ground pipe; and Above ground pipe will have a fall of 1% to allow waste discharged at the facility to flow into the lined pond.
Acceptance, storage and handling of solid and liquid wastes prior to disposal off-site	Contaminated stormwater	Direct discharge to soil, and seepage through soil into groundwater	<p>Existing controls previously assessed under Works Approval W6519/2021/1.</p> <p>The Existing Licence includes various controls for the mitigation of contaminated stormwater emissions.</p>
<p>Acceptance, storage and handling of waste in the transfer station prior to disposal off-site</p> <p>Acceptance of liquid wastes through the new pond discharge point</p>	Odour	Air/windborne pathway	<p>Existing controls previously assessed under Works Approval W6519/2021/1.</p> <p>The Existing Licence includes various controls for the mitigation of odour emissions.</p>

Sources	Emission	Potential pathways	Proposed controls
Operation of baler within processing shed Increase in crushing and screening throughput Mulching of green waste	Noise	Air/windborne pathway	Existing controls previously assessed under Works Approval W6519/2021/1. The Existing Licence includes various controls for the mitigation of noise emissions. Baler located within the existing processing shed.
Waste acceptance, processing and vehicle movement Mulching of green waste	Dust	Air/windborne pathway	Existing controls previously assessed under Works Approval W6519/2021/1. The Existing Licence includes various controls for the mitigation of dust emissions.
Crushing and screening of C&D waste	Dust containing asbestos	Air/windborne pathway	Existing controls previously assessed under Works Approval W6519/2021/1. The Existing Licence includes various controls for the mitigation of asbestos fibre emissions.
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Hazardous spills	Direct discharge to soil, and seepage through soil into groundwater	Existing controls previously assessed under Works Approval W6519/2021/1. The Existing Licence includes various controls for the mitigation of hazardous spills emissions. Oil is poured in from the elevated ramp area into the storage tanks, whereby spillages are contained within the bunded area. Containment bund capacity is 93 kL, with the combined tank capacity being 33 kL. A controlled waste carrier is engaged to pump out the bunded area and the controlled waste is transported to a J120 facility in Perth when required.
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Vermin	Transmission by vectors	Existing controls previously assessed under Works Approval W6519/2021/1. The Existing Licence includes various controls for the mitigation of vermin.
Increased used tyre storage from 1,000 to	Gaseous and particulate	Air/windborne pathway	Existing controls previously assessed under Works Approval

Sources	Emission	Potential pathways	Proposed controls
1,500 per year Waste acceptance, storage and processing	emissions (from potential fire)		W6519/2021/1. The Existing Licence includes various controls for the mitigation of gaseous emissions associated with fire. Storage of tyres in accordance with <i>Guidance Note: GN02 - Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres</i> (Department of Fire and Emergency Services, 2020).

3.1.2 Receptors

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

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

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

Human receptors	Distance from prescribed activity
Rural residential premises	Closest are approximately 700m north, approximately 750m northwest, and approximately 730m northeast of the premises boundary.
Residential suburbs	Karloo - Approximately 1.5km northwest of the premises boundary. Wandina – Approximately 1.6km southwest of the premises boundary.
Industrial premises	Premises is in an industrial area. The closest neighbouring industrial premises is immediately adjacent to the eastern boundary of the premises.
Environmental receptors	Distance from prescribed activity
Chapman River	Approximately 3km north-east of the premises boundary
Greenough River	Approximately 3.5km south of the premises boundary
<i>Rights in Water and Irrigation Act 1914</i> (RIWI Act) - Groundwater Areas	Premises within the RIWI Act groundwater area
Greenough River and Tributaries Catchment Area	Immediately adjacent to the east of the premises boundary.
Underlying groundwater (non-potable purposes)	Premises is in the Arrowsmith Groundwater Area. Depth to groundwater is 10-20mBGL. Groundwater salinity is 3000-7000mg/L.
Western Australian Herbarium specimens	Two within 2km of premises boundary
Threatened and Priority Flora	One within 2km of premises boundary
Aboriginal Sites and Heritage Places	Three within 2km of premises boundary: <ul style="list-style-type: none"> Place ID – 26739 GSTCS2-Artifact scatter AS001/2009 Place ID – 20854 Geraldton Southern Transport Corridor Field Site 03 Place ID – 20852 GSTC-ISO-01 to 04

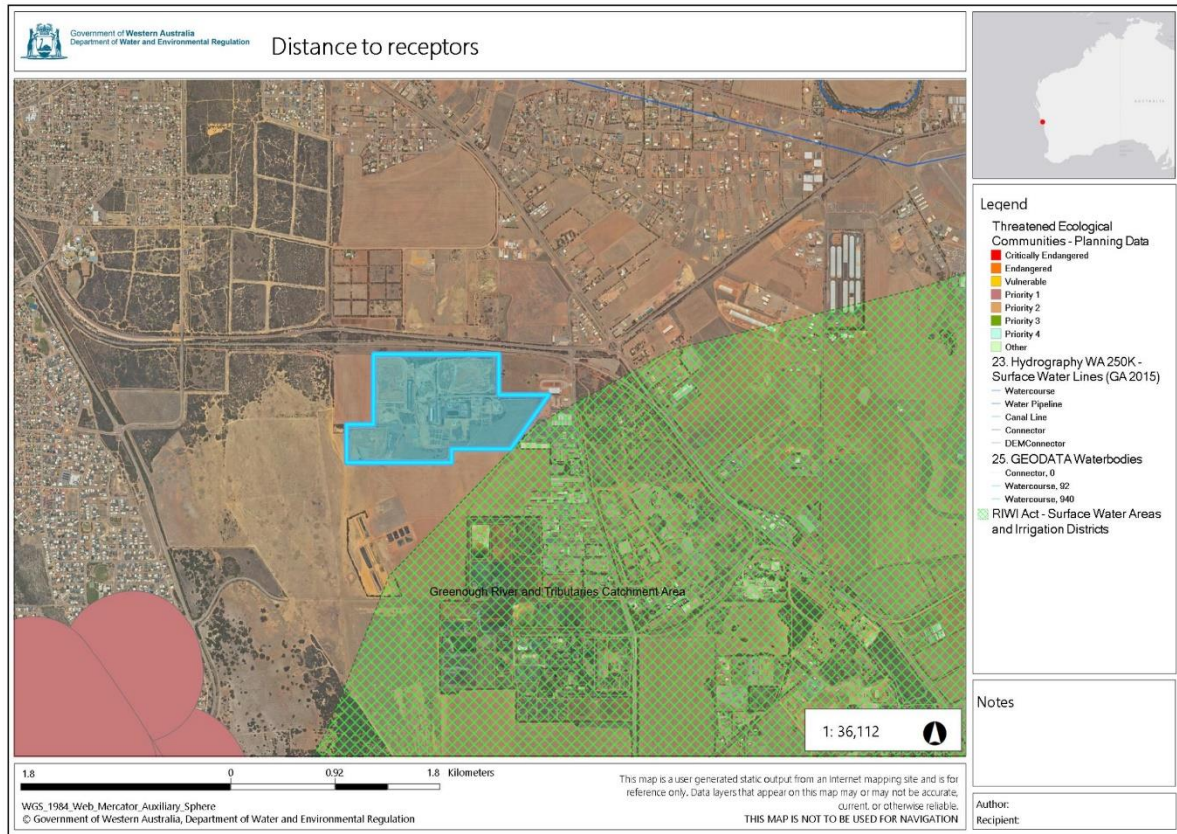


Figure 1: Receptors Map

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete 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 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 L9127/2018/1 that accompanies this Amendment Report authorises emissions 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 from the Premises during operation

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Reasoning
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Waste and leachate	Direct discharge to the land causing impacts on human health, soil and ground water quality	Arrowsmith Groundwater Area Greenough River and Tributaries Catchment Area Immediately adjacent to the east of the Promises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Conditions 1, 4 and 31 to 35 Existing conditions 3, 17, 29 and 30.	The Delegated Officer considers the controls assessed under Works Approval W6519/2021/1 and existing applicant controls to be sufficient to mitigate waste and leachate emissions generated by transfer station and liquid waste activities. The acceptance and disposal of Special waste type 3 is limited to meeting the acceptance criteria for single composite lined landfills as specified in <i>PFAS National Environmental Management Plan 2.0</i> (HEPA, 2020) and the acceptance criteria for Class III landfills as specified in the Landfill Definitions for contaminants other than PFAS.
Acceptance and storage of liquid wastes prior to disposal off-site						Yes	Conditions 1, 4 and 31 to 35 Existing condition 36 Conditions 56 to 58	
Acceptance and disposal of Special waste type 3						Yes	Conditions 1, 4 and 31 to 35. Condition 2	
Acceptance of liquid wastes through the new pond discharge point	Leachate	Direct discharge to the land causing impacts on human health, soil and ground water quality	Arrowsmith Groundwater Area Greenough River and Tributaries Catchment Area Immediately adjacent to the east of the Promises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Conditions 4 and 31 to 35 Existing conditions 29, 30 and 36	The Delegated Officer considers the applicant's controls sufficient to mitigate leachate emissions generated by the acceptance of liquid wastes through the new pond discharge point. The Delegated Officer considers the risk profile of the new infrastructure to be unchanged from the existing discharge point, with existing hardstand and containment remaining.
Acceptance, storage and handling of solid and liquid wastes prior to disposal off-site	Contaminated stormwater	Direct discharge to the land causing impacts on human health, soil and ground water quality	Arrowsmith Groundwater Area Greenough River and Tributaries Catchment Area Immediately adjacent to the east of the Promises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Conditions 1 and 4 Existing conditions 26 to 28	The Delegated Officer considers the controls assessed under Works Approval W6519/2021/1 and existing applicant controls to be sufficient to mitigate contaminated stormwater emissions generated by transfer station waste acceptance and storage activities.
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Odour	Air/windborne pathway causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary Industrial premises immediately adjacent to eastern boundary of the premises	Refer to Section 3.1	C = Slight L = Possible Low Risk	Yes	Conditions 1, 2 and 4 Existing conditions 3, 17 and 55	The Delegated Officer considers the controls assessed under Works Approval W6519/2021/1 to be sufficient to mitigate odour emissions generated by transfer station waste acceptance and storage activities.
Acceptance of liquid wastes through the new pond discharge point					C = Slight L = Possible Low Risk	Yes	Conditions 56 to 58	The Delegated Officer considers that the modification to discharge liquid waste above the level of the pond as opposed to the previous arrangement beneath the surface of the pond will not increase the risk of odour emissions generated appreciably. Conditions 57 and 58 require the submission of an Environmental Compliance Report to certify the works in accordance with the requirements of the licence.
Operation of baler within processing shed Increase in crushing and screening throughput Mulching of green waste	Noise	Air/windborne pathway causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary Industrial premises immediately adjacent to eastern boundary of the premises	Refer to Section 3.1	C = Slight L = Possible Low Risk	Yes	Conditions 1 and 4	Noise is not considered likely to cause any distinguishable impacts at this distance. The Delegated Officer considers that the provisions of the <i>Environmental Protection (Noise) Regulations 1997</i> are sufficient to regulate noise emissions from waste storage activities.

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Reasoning
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								Condition 4 requires that only one mobile plant be operated at any given time.
Waste acceptance, processing and vehicle movement Mulching of green waste	Dust	Air/windborne pathway causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary Industrial premises immediately adjacent to eastern boundary of the premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Yes	Conditions 2 and 4 Existing condition 19	Dust is not considered likely to cause any distinguishable impacts at this distance. The Delegated Officer considers that the provisions of section 49 of the EP Act and the addition of a dust outcome condition are sufficient to regulate dust emissions associated with waste storage activities.
Crushing and screening of C&D waste	Dust containing asbestos	Air/windborne pathway causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary Industrial premises immediately adjacent to eastern boundary of the premises	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Conditions 2, 4 and 41 to 52 Existing condition 19	The Delegated Officer considers the existing regulatory controls to be sufficient to mitigate the risk of asbestos fibre emissions. The increase in Inert waste type 1 acceptance volumes is not considered to risk the risk profile associated with asbestos fibre emissions, given the existing licence conditions of 41 to 52.
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Hazardous spills	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality. Seepage to groundwater.	Groundwater and surface water drainage systems	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Yes	Conditions 1, 2, 4 and 31 to 35 Existing conditions 29, 30 and 37 to 40	The Delegated Officer considers the controls assessed under Works Approval W6519/2021/1 to be sufficient to mitigate the potential for hazardous spills generated by waste storage activities.
Acceptance, storage and handling of waste in the transfer station prior to disposal off-site	Vermin	Transmission by vectors causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Yes	Conditions 2 and 4	The Delegated Officer has determined that the transmission of pathogens by vectors causing low level adverse health effects may only occur in exceptional circumstances.
Increased used tyre storage from 1,000 to 1,500 per year Waste acceptance, storage and processing	Gaseous and particulate emissions (from potential fire)	Air/windborne pathway causing impacts to health and amenity	Rural residences approximately 700m north of the premises boundary Industrial premises immediately adjacent to eastern boundary of the premises	Refer to Section 3.1	C = Major L = Rare Medium Risk	Yes	Conditions 1 and 4 Existing conditions 20 to 25 and 28	The Delegated Officer considers the controls assessed under Works Approval W6519/2021/1, in addition to existing firefighting capability conditions, to be sufficient to mitigate the risk of fire events. The Delegated Officer has considered the appropriateness of tyre storage within hooklift bins as a portable system, in accordance with section 6 of <i>Guidance Note: GN02 - Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres</i> (Department of Fire and Emergency Services, 2020).

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

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

4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
Licence holder was provided with draft amendment on 29/11/2024	Refer to Appendix 1	Refer to Appendix 1

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

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
Cover page	Updated the category 13 and 61A, and included category 62.
Condition 1 Table 1	Inclusion of existing infrastructure table, and addition of infrastructure constructed under W6519/2021/1.
Condition 2 Table 2	Updated Table 2 for consistency following the completion of the Resource Recovery Station constructed under W6519/2021/1. Addition of Special Waste Type 3 acceptance.
Condition 4 Table 3	Amendment of crushing and screening operation. Addition of new and existing processes, including baling and mulching. Addition of Special Waste Type 3 disposal. Removal of FOGO composting activities.
Existing condition 5	Removal of FOGO composting monitoring requirements.
Existing condition 6	Removal of FOGO composting monitoring requirements.
Existing condition 7	Removal of FOGO composting monitoring requirements.
Existing condition 8	Removal of FOGO composting monitoring requirements.

Existing condition 22	Tyre storage requirement moved to Table 3.
Condition 31	Monitoring bore names and locations amended.
Condition 32	Monitoring bore names and locations amended.
Condition 41	Amended to differentiate C&D waste accepted for disposal or crushing and screening.
Condition 45	Reference to <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> amended.
Condition 48	Requirements for C&D stockpiles amended.
Condition 49	Reference to <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> amended.
Condition 50	Reference to <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> amended.
Condition 52 Table 5	Reference to <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> amended.
Condition 54	Requirements for desludged pond material amended.
Condition 56	Requirements for the construction of the new Liquid Waste Pond 1 disposal point.
Condition 57	Submission of an Environmental Compliance Report following completion of Condition 56.
Condition 58	Reporting requirements of the Environmental Compliance Report.
Definitions Table 7	Updated definitions based on the amendments to the licence.
Attachment 1	Figure 2. Map of groundwater monitoring bore locations amended. Figure 4. Premises layout amended. Figure 7. Composting layout removed. Figure 7. Proposed Liquid Waste Pond 1 modification plan added. Figure 8. Proposed Liquid Waste Pond 1 modification cross section added. Figure 9. Community Waste Transfer Station Layout Plan added.
Attachment	Section 3.4 of the <i>Guideline: Managing asbestos at construction and</i>

2	<i>demolition waste recycling facilities</i> amended.
Attachment 3	Section 4.3 of the <i>Guideline: Managing asbestos at construction and demolition waste recycling facilities</i> amended.
Schedule 1	List of Hazardous Household Waste accepted within HHW program amended.
Schedule 2	Landfill acceptance criteria for Special Waste Type 3 added.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Fire and Emergency Services (DFES) 2020, *Guidance Note: GN02 - Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.
4. DWER 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

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

Condition	Summary of Licence Holder's comment	Department's response
Category 13	The licence holder requested that crushing of C&D waste is increased to up to 60,000 tonnes per year to allow for the processing of stockpiles currently at the premises. The existing 20,000 tonnes per year would then apply again following the completion of the stockpile.	The department has provided for the increase in the Category 13 production capacity, and considers that any temporary increase in emissions would not cause any distinguishable impacts at the distance to sensitive receptors. The existing acceptance limit of 20,000 tonnes per annual period for inert waste type 1 will remain, which will prevent the continuing of increased crushing once the stockpile has been depleted.
Condition 1, Table 1	The height of security fencing should be amended to align with condition 5.	The height of the security fencing has been amended to 1.8 m.
Condition 1, Table 1	The licence holder wishes to retain the previously used Household Hazardous waste (HHW) shed in the infrastructure table.	The existing HHW shed has been retained, noting that no prescribed processes are conditioned for the shed.
Condition 2, Table 2	The licence holder queried the applicability of double lined plastic wrapping for asbestos contaminated soil.	<p>The condition has been amended such that ACM and/or asbestos contaminated soil that cannot be practicably wrapped in heavy duty plastic must be contained in a manner that prevents asbestos fibres entering the atmosphere, which is consistent with the <i>Environmental Protection (Controlled Waste) Regulations 2004</i>.</p> <p>Condition 4, Table 3 has also been amended to specify cover requirements for ACM and/or asbestos contaminated soil that is not wrapped in heavy duty plastic, which must be covered with cover material to a depth of at least 500 mm immediately after deposit.</p>
Condition 4, Table 3	The licence holder queried whether mulched green waste mixed with clean fill could be used as cover material.	The department considers that cover material should be dense, inert and incombustible. The main functions of cover are to minimise adverse amenity impacts such as odour, dust, litter, the presence of scavengers and vermin, and the risk of fire. It is also desirable that the cover material limits rainfall infiltration into the waste. Mulched green waste is not considered to meet the impact mitigation requirements of cover material, and is not considered appropriate for cover material.

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Condition	Summary of Licence Holder's comment	Department's response
54	The licence holder queried the applicability of disposing sludge from the liquid waste ponds in accordance with the <i>Western Australian Guidelines for Biosolids Management, December 2012</i> .	The department has amended the condition to specify that spadeable sludges and solids removed from the liquid waste ponds during desludging activities must be tested, classified, and disposed of to an appropriate landfill cell, which align with the <i>Western Australian Guidelines for Biosolids Management, December 2012</i> .