



## Application for Licence

### Division 3, Part V *Environmental Protection Act 1986*

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<b>Licence Number</b>	L9197/2019/1
<b>Applicant</b>	Allied Metal Recyclers Pty Ltd
<b>ACN</b>	106 294 428
<b>File Number</b>	DER2019/000152
<b>Premises</b>	Allied Metal Recyclers 13B Stott Road WELSHPOOL WA 6106  Legal description - Lot 8 on Diagram 36953 Certificate of Title Volume 2004 Folio 408 And Lot 100 on Deposited Plan 412991 Certificate of Title Volume 2950 Folio 592
<b>Date of Report</b>	6 August 2019

## Definitions

In this Decision Report, the terms in the Table below have the meanings defined.

**Table 1: Definitions**

Term	Definition
ACN	Australian Company Number
Category/ Categories/ Cat.	Categories of Prescribed Premises as set out in Schedule 1 of the EP Regulations
CS Act	<i>Contaminated Sites Act 2003</i>
Decision Report	refers to this document.
Delegated Officer	an officer under section 20 of the EP Act.
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act.
DWER	Department of Water and Environmental Regulation As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the <i>Public Sector Management Act 1994</i> and is responsible for the administration of the <i>Environmental Protection Act 1986</i> along with other legislation.
Emission	has the same meaning given to that term under the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Licence Holder	means Allied Metal Recyclers Pty Ltd
Noise Regulations	<i>Environmental Protection (Noise) Regulations 1997 (WA)</i>
Occupier	has the same meaning given to that term under the EP Act.
Prescribed Premises	has the same meaning given to that term under the EP Act.
Premises	refers to the premises to which this Decision Report applies, as specified at the front of this Decision Report
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>

## Background

Allied Metal Recyclers Pty Ltd (the Applicant) operate a scrap metal recycling facility in Welshpool, WA and produce a range of recycled metal products which are sold to domestic and overseas markets.

The Applicant has previously operated under the same name from 33 & 35 Felspar Street, Welshpool, with current operations located at 13B Stott Road, Welshpool. Accepted scrap metal is primarily sourced from scrap metal bin services, the dismantling and demolition of steel structures, general commercial, industrial and agricultural site clean-up, and auction disposals. Waste materials that do not have a market available for re-use or non-conforming wastes are transported offsite for disposal at an appropriately licenced facility.

## Overview of Premises

Allied Metal Recyclers is located approximately 9km south-east of the Perth CBD within a general industry zoned area as defined by the City of Canning Town Planning Scheme No. 40. The Premises comprises an area of approximately 20,000 m<sup>2</sup> and is a battle-axe block bordered by other industrial premises to the north, south and west and a low-lying Water Corporation stormwater compensation basin to the east. The Premises is predominantly concrete hardstand with a small grassed area located to the south of the office building which is maintained for aesthetic purposes.

The Applicant adheres to a strict waste acceptance policy and primarily accepts scrap metal in the form of lengths of steel, empty drums and tanks, sheet metal, swarf and copper cables. Expended fire extinguishers and lead acid batteries are also accepted.

The processing of accepted scrap metal products at the Premises for commercial purposes will cause the Premises to become prescribed under the EP Act for the category of scrap metal recovery as described in Table 2 below.

**Table 2: Classification of premises – as per Schedule 1 of the EP Regulations**

<b>Classification of Premises</b>	<b>Description</b>	<b>Approved Premises production or design capacity or throughput</b>
Category 47	Scrap metal recovery: premises (other than premises within category 45) on which metal scrap is fragmented or melted, including premises on which lead acid batteries are reprocessed	80,000 tonnes per annual period

## Description of operations

### Waste acceptance

Metal waste material arrives at the Premises in trucks which are from the Applicant's own fleet, or privately owned by external customers. Prior to the load being accepted it is registered at the weighbridge and visually inspected for hazardous waste, which is specified on signage at the entrance to the facility. If hazardous waste is not identified the load is then weighed and declaration paperwork is completed by the driver of the truck to confirm that material is non-hazardous.

Asbestos or ACM is not accepted at the site and any loads with identifiable asbestos are immediately rejected. If ACM is inadvertently received at the facility the suspected contaminated material will be isolated and ACM will be manually picked from the load, bagged and removed for disposal to an appropriate facility. There will be no storage of ACM on-site. The Applicant has provided an Asbestos Management Plan (AMP) as a part of their Licence application which

will be adhered to in the event that asbestos is identified.

Once a truck has been accepted into the facility waste is tipped into the oversized stockpiles where the contents are initially sorted into differing waste types and placed in designated stockpiles prior to further mechanical processing. Any non-conforming waste types that are identified from the load are stored in hook bins or stockpiles for a short period of time before being transferred offsite for disposal at an appropriately licenced facility. Due to the Applicants strict acceptance policy for selected scrap metal waste only by-products of the recycling process exist in relatively low quantities.

Customers are informed that wastes must be free of any kind of contaminant material prior to acceptance. When waste is identified as potentially containing liquid contaminants, it is visually inspected to confirm the absence of liquids. In the event that liquids are found, they are drained into 1000L Intermediate Bulk Containers (IBC's) for collection by the customer or disposal by a preferred waste company.

Fire extinguishers found to be full are stored in skip bins prior to collection by the customer.

The Applicant has advised that there is no intention to accept tyres at the Premises however, where tyres are inadvertently received, they will be stored within 10-yard bins prior to disposal offsite. The number of tyres stored on-site will not exceed 100 at any one time and will comply with guidance outlined in the Department of Fire and Emergency Services (DFES) *Guidance Note: GN02 – Bulk Storage of Rubber Tyres including Shredded and Crumbed Tyres* (as amended from time to time).

### Metal Recycling Process

After tipping, waste materials within the oversized stockpiles are separated and moved into designated stockpiles for:

- in-size ferrous items (lengths of steel, empty drums and tanks, sheet metal);
- non-ferrous items (aluminium, brass, copper); and
- oversize ferrous items (large scale industrial steel and redundant machinery) to be sized using oxy acetylene (oxy area) and/or using fixed or mobile shears prior to transport offsite.

Processing and storage zones for each waste stream are specified in Figure 1 below, and a full list of site infrastructure and equipment used in the recycling process for all Premises activities is included in Table 3.

The Applicant has advised that stockpiled material currently located within the oxy area will be sorted and materials relocated by 31 August 2019 to allow for better movement of vehicles around the site.

Oversized ferrous material is cut to size using fixed or mobile shears. This is then moved to the in-size stockpile where material which arrives on-site already at an appropriate size is stockpiled. Materials sized within the oxy area are also moved to the in-size stockpile. Forklifts and excavators are used throughout the site for movement of materials. Wastes which are received at or have been reduced to their transportable sizes are then loaded into tipped sea containers for exportation to overseas markets.

Non-ferrous material is manually sorted within the non-ferrous shed. Magnets are used to remove any ferrous material from the non-ferrous product stream, any material recovered in this manner is returned to the ferrous metal processing area. Fixed balers are used to compact some materials (eg. Aluminium cans) into a transportable state. Copper is recovered from PVC coated cables by being fed into a mini-shredder, and any recovered PVC waste is stored in drums or bags prior to disposal at an appropriately licenced facility.

Fire extinguishers are accepted open and cleaned out with their spouts removed and are

pressed into blocks using the baler prior to export to overseas markets.

Lead acid batteries are stored within the non-ferrous shed on bunded pallets capable of containing any spilt liquid. These are wrapped prior to collection by a specialist recycled battery processor.

#### Management of potentially contaminated stormwater

All fuel required for the site is contained in a bunded 20,000L storage tank. Potential hydrocarbon spills resulting from operations of equipment will be immediately contained using hydrocarbon absorbent booms around the perimeter of the spill and cleaned with hydrocarbon absorbent material (vermiculite). Spill kits are located in three locations around the site as specified in Figure 1, and all hydrocarbon waste is placed into designated hydrocarbon bins for removal offsite to an appropriately licenced facility.

Stormwater at the site enters a network of soakwells located across working areas and infiltrates into the ground. This management system is outlined in Figure 3 of Appendix 1. To prevent stormwater potentially contaminated with hydrocarbons entering into the infiltration soakwell network, hydrocarbon absorbent bunds will be placed around the soakwells, and the soakwells will be fitted with hydrocarbon absorbent polypropylene drain wardens. Weekly inspections of the soakwells will be undertaken by the site manager to ensure the booms and drain wardens remain in place and undamaged around the soakwells. If any damage is noted the booms and drain wardens will be replaced, otherwise they will be replaced when their capacity has been reached or following an oil spill. The drain warden has the capacity to contain 20L of oil following a spill and will also act to catch small waste metal materials to prevent them from affecting soakwell performance. The movement of the oxy area stockpile will allow access to soakwells currently located underneath, and once these materials have been removed booms drain wardens will also be fitted to these soakwells.

Groundwater monitoring will be undertaken bi-annually to assess any potential impact to groundwater and will be conducted using the four groundwater monitoring wells located around the perimeter of the site in the locations specified in Figure 4 of Appendix 1.

#### Management of fire wash-waters

Any fire wash-water generated from fire suppression will be filtered using the hydrocarbon absorbent booms and drain wardens to prevent contaminants entering the soakwells. All firefighting effluent will be contained on-site as far as practicable.

The Applicant has provided a *Safe Work Procedure – Fire Prevention plan* as a part of their application which will be adhered to by site personnel at all times. Fire risk will be reduced through the limited acceptance of flammable and combustible materials to the Premises, and the utilisation of hot work permits for activities likely to present a fire risk (eg. oxy-cutting).

The site contains a network of fire hydrants, fire hoses and a 100-kL water cannon which are available for fire suppression. The Applicant has provided confirmation issued by the Department of Fire and Emergency Services (DFES) that an inspection was undertaken by DFES officers on 27 April 2017, and that at the time of inspection the installed fire safety systems met DFES operational requirements.

#### Management of dust emissions

Dust from stockpiles will be managed through use of water tanks brought to site as required, and the application of water to stockpiles will be monitored to ensure that there is minimal generation of potentially contaminated water runoff. Regular road sweeping and speed restrictions of 5km/hr will also be implemented.

#### Management of noise emissions

The Applicant has not provided a noise assessment for Premises activities on the basis that no sensitive receptors are located within a 500m radius of the site. The Applicant has indicated that

site equipment will be regularly serviced to ensure there is no additional noise or vibration generated. A complaints register will also be maintained at the Premises, and if any noise related complaints are received, the source of the excessive noise will be identified and removed from operational work until the issue is resolved. The facility will operate from 7:00am to 4:00pm Monday to Friday, 8:00am to 12:00pm Saturday, and will be closed Sundays and Public Holidays.

A search of DWER’s Incident and Complaint Management System (ICMS) indicates that no noise related complaints have been received for Premises activities. If any concerns relating to noise emissions are received, DWER may request a noise assessment be completed by the Applicant to confirm that Premises operations are in compliance with the *Environmental Protection (Noise) Regulations 1997*.

**Table 3: Site infrastructure**

Infrastructure	Site Layout Plan Reference
Fixed baler	Aerial overview of Premises in Figure 1.
Fixed shear	
Sea container tilter	
Sea container fork	
Excavator	
Granulator	
Telescopic handler	
Hydrocarbon spill kits	
Weighbridge	
Diesel tank	
Infiltration soakwells	Figure 3 in Appendix 1.
Polypropylene Drain warden	Fitted within every soakwell outlined Figure 3 in Appendix 1.
Hydrocarbon absorbent booms	
Groundwater monitoring bores	Figure 4 in Appendix 1.



**Figure 1: Aerial overview of Premises**

## Environmental siting

The Premises is located 9km south-east of the Perth CBD within the Welshpool Industrial Area, which is specified as 'general industry' as defined by the City of Canning Town Planning Scheme No. 40. DWER have previously issued licences within this area with seven Prescribed Premises being located within a 1000m radius of the site. The distance of the site to residential and sensitive receptors is outlined below in Table 4.

**Table 4: Residential and sensitive receptors and distance from activity boundary**

Residential and sensitive premises	Distance from Prescribed Premises
Residential properties	900m south-west of the Premises.
Water Corporation – Banksia Road stormwater compensation basin	Adjacent to the east of the Premises.

The site is located within the Pinjarra Plain formation of the Swan Coastal Plain, with soil content being primarily clay and sand. The site is also located in the Cloverdale Area of the unconfined Superficial Swan Aquifer, with groundwater inferred to flow in a southerly direction, towards the Canning River which is approximately 4km away. Environmental receptors which will potentially be sensitive to Premises activities are listed in Table 5 below.

**Table 5: Environmental receptors and distance from activity boundary**

Environmental receptors	Distance from Prescribed Premises
Banksia Road stormwater compensation basin	Immediately east of the Premises.
Bushforever site No. 424 <ul style="list-style-type: none"> <li>McDowell Street Bushland, Welshpool</li> </ul>	270m south of the Premises.
Bushforever site No. 283 <ul style="list-style-type: none"> <li>Queens Park Bushland, Queens Park</li> </ul>	660m south-west of the Premises.
<i>Rights in Water and Irrigation Act 1914 (RIWI)</i> <ul style="list-style-type: none"> <li>Perth Groundwater Area (proclaimed area under RIWI Act)</li> </ul>	Premises located within this mapped area Results from on-site groundwater monitoring indicates that water levels were encountered between 2.503 m below ground level (mbgl) to 3.776 mbgl ( <i>Soil and Groundwater Monitoring Event</i> (SGME, Pumps United 2018)).
Threatened and Priority Flora and Fauna <ul style="list-style-type: none"> <li><i>Calyptorhynchus latirostris</i> (Carnaby's Cockatoo)</li> <li><i>Macarthuria keigheryi</i> (Keighery's Macarthuria)</li> </ul>	Threatened and Priority Flora and Fauna mapped within 1000m to the south of the Premises, associated with Bushforever site No. 283 and 424
Threatened Ecological Communities <ul style="list-style-type: none"> <li>Banksia dominated woodlands of the Swan Coastal Plain IBRA Region</li> <li>Banksia dominated woodlands over</li> </ul>	Premises located within this mapped area - there are a number of Threatened Ecological Communities identified within close proximity.



Environmental receptors	Distance from Prescribed Premises
species rich dense shrubland	
Green Growth Wetlands Commitments <ul style="list-style-type: none"> <li>Southern River Complex</li> </ul>	270m south of Premises.
Geomorphic Wetlands – Swan Coastal Plain <ul style="list-style-type: none"> <li>Dampland basin</li> </ul>	750m south-east of Premises.

## Legislative context and other approvals

The Applicant has obtained local government planning approvals as required for site operations so as to be compliant with the City of Canning Town Planning Scheme No. 40. A summary of the planning approval is outlined in Table 6 below.

**Table 6: Relevant approvals**

Legislation	Number	Approval
<i>Planning and Development Act 2005</i>	15/17650.2	Development Approval issued by the City of Canning 15 February 2017 for scrap metal recycling facility – modifications to an existing approval (alterations to existing general industry site and change of use to salvage yard)  The Development Approval has no expiry.

## Compliance inspections and compliance history

The Applicant has previously operated under the same name from 33 & 35 Felspar Street, Welshpool. There have been several reports to DWER regarding operations occurring at the operator's previous site on Felspar Street, Welshpool, and operations occurring at the current Premises at 13B Stott Street, Welshpool. Table 7 below summarises the compliance history relating to the Applicant's past and current operations.

**Table 7: Compliance History**

Date	Purpose	Findings	Corrective action taken
13/12/2013 33 & 35 Felspar Street, Welshpool	Pollution Response Unit inspection	DWER identified oil on unsealed ground in front of machinery maintenance areas and leaking from site machinery.  Soil was found to be contaminated.	Environmental Field Notice (EFN) #13928 issued for removal of hydrocarbon contaminated soil to landfill – follow up inspection 06/02/2014 confirmed this had been completed.
11/03/2015 33 & 35 Felspar Street, Welshpool	Compliance inspection in response to a Pollution Watch Hotline request	DWER identified hydrocarbon staining of hardstand was observed under machinery.  Oil discharge was observed into unsealed soil.  Soil was found to be	Environmental Field Report (EFR) #4560 issued for removal of hydrocarbon contaminated soil to landfill – confirmation from site manager received 18/03/2015 advising this had been completed.

Date	Purpose	Findings	Corrective action taken
		contaminated.	
12/04/2017 33 & 35 Felspar Street, Welshpool	Compliance inspection in response to dust complaint	Referred to the City of Canning to follow-up.  Some discharges of hydrocarbons to unsealed ground.	60 days Direction Notice issued by the City of Canning for adequate dust suppression on site and removal of hydrocarbon contaminated soil – City of Canning to follow-up with validation sampling.
08/02/2019 13B Stott Street Welshpool	Compliance inspection in relation to hydrocarbon discharge into soakwells	Inspection confirmed minimal small leaks of hydrocarbons on site. Treated with spill kits.  No hydrocarbon discharges off site.	None required.

## Review of soil and groundwater monitoring data

The Applicant submitted a report titled *Soil and Groundwater Monitoring Event* (SGME, Pumps United 2018) as a part of their licence application. The purpose of this assessment was to determine environmental conditions following commencement of scrap metal recycling operations at the site. Pumps United also conducted a baseline SGME in 2017 prior to the commencement of site operations, hence the results of the submitted report conducted in 2018 are compared to these baseline soil and groundwater monitoring results collected in 2017.

The sampling of groundwater was conducted utilising four on-site groundwater monitoring wells (MW1, MW2, MW3 and MW4) located on the Premises boundary as show in Figure 3 in Appendix 1, which were installed at the site in October 2016. The standing water level was recorded prior to samples being collected.

Limited soil sampling was also carried-out in two soakwells, the locations of these being outlined in Figure 5 or Appendix 1.

All samples were submitted to an appropriate NATA accredited environmental laboratory for analysis. Samples were primarily assessed to establish metal, hydrocarbon and nutrient concentrations, and whether these exceeded relevant land use assessment criteria. The assessment criteria used for the SGME is as follows:

- Groundwater assessment -
  - National Environmental Protection (Assessment of Site Contamination) Measure (1999) as amended (2013) Scehdule B1 – Guideline on Investigation Levels for Soil and Groundwater;
  - Australia and New Zealand Environmental and Conservation Council (ANZECC 2000) *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*; and
  - Department of Health Contaminated Sites Ground and Surface Water Screening Guidelines.
- Soil assessment –
  - National Environmental Protection (Assessment of Site Contamination) Measure (1999) as amended (2013) – Ecological Investigation Levels, Ecological Screening levels, Health Investigation Level D, Health Screening Levels for vapor intrusion, and Management limits for Total Petroleum Hydrocarbon fractions.

It was concluded that groundwater concentrations of total and dissolved metals, sulphides and nutrients exceeded the adopted assessment criteria, whilst concentrations of phenols and hydrocarbons were below the adopted assessment criteria. Soil samples collected from the soakwells were found to have olfactory hydrocarbon contamination with a very strong hydrocarbon odour, suggesting that hydrocarbons have been allowed to enter the stormwater system. The laboratory analysis on the soil samples indicated that the concentrations of metals and hydrocarbons within the soil have increased compared to the baseline monitoring event prior to site activities and also exceeded the adopted assessment criteria.

Results from the SGME indicate that the increase in metal and hydrocarbon concentrations in the soil is attributable to the current operations at the site. This finding provides DWER with justification to set firm regulatory controls within the licence surrounding the management of hydrocarbon spills, potentially contaminated stormwater and the monitoring of emissions to groundwater.

## **Monitoring of potential impacts to groundwater**

The Applicant has advised that groundwater will be monitored bi-annually to assess any potential impact to groundwater underlying the site resulting from the infiltration of potentially contaminated stormwater through soakwells. Groundwater samples will be collected from the four groundwater monitoring bores as shown in Figure 4 or Appendix 1, and the samples submitted to a NATA accredited laboratory for analysis of:

- Physical parameters;
- Major anions/cations;
- Metals;
- Hydrocarbons; and
- Nutrients.

## Risk assessment

Table 8: Risk assessment during operations

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors	Potential pathway & receptor (impact)	Applicant controls					
High rainfall events	Potentially contaminated stormwater and surface water run-off: all active areas and stockpiles	Banksia Road stormwater compensation basin east of Premises Perth Groundwater Area – Premises located within mapped area (see Table 5) Green Growth Wetlands – Southern River Complex 270m south of Premises	<p><b>Stormwater and surface water run-off:</b> Contamination of stormwater with hydrocarbons due to interaction with residual matter on stockpiled material and hydrocarbon spills</p>	<p>No liquid wastes are accepted at the Premises.</p> <p>Waste is visually inspected prior to acceptance to confirm absence of liquid wastes.</p> <p>If liquids are found, they are drained into 1000L IBC's for collection by the customer or disposal by a preferred waste company.</p> <p>All fueling and movement of vehicles occurs on a concrete hardstand.</p> <p>Fuel is kept on-site in a bunded storage tank.</p> <p>Spills of hydrocarbons will be immediately contained using hydrocarbon absorbent booms and removed with vermiculite.</p> <p>Soakwells to be fitted with polypropylene drain wardens to prevent hydrocarbons infiltrating groundwater.</p> <p>Soakwells to have hydrocarbon absorbent bunds placed around drains to further prevent hydrocarbons entering soakwell network.</p>	Moderate	Likely	Medium	<p>The Applicant does not intend to accept or process materials containing liquid wastes which will lower the associated risk of stormwater and water used for dust suppression being impacted. Notwithstanding this, the potential for certain scrap metal wastes to contain residual grease, lubricants and oil remains elevated.</p> <p>The 20 000L on-site fuel tank is stored on bunded hardstand compliant with current Australian Standard guidelines which will contain any spills. The immediate response to spills is to control, contain and clean-up using hydrocarbon absorbent materials, ensuring that hydrocarbons are removed from the concrete hardstand prior to major rainfall events.</p>	<p>Conditions 3 and 4</p> <p>Condition 12, 13 and 14</p> <p>Conditions 17, 18 and 19</p> <p>Condition 21</p>
			<p><b>Stormwater and surface water run-off:</b> Contamination with hazardous materials from accepted waste (PFAS from fire extinguishers)</p>	<p>Fire extinguishers are only accepted open, cleaned out and with spouts removed.</p> <p>Fire extinguishers are stored in skip bins.</p> <p>All processing of fire extinguishers occurs on a concrete hardstand.</p> <p>Any fire extinguishers found to be full are stored in skip bins and removed from site.</p>	Moderate	Possible	Medium	<p>The acceptance of only open and cleaned out fire extinguishers will ensure that no contaminating involving fire-fighting foam will occur.</p> <p>The storage of full fire extinguishers within skip bins will prevent the possibility of contamination with stormwater, and subsequent infiltration of contamination to groundwater.</p> <p>Activities occurring on concrete hardstand will prevent potentially contaminated stormwater leaching directly into groundwater.</p>	<p>Conditions 3 and 4</p> <p>Condition 7 and 8</p> <p>Conditions 17, 18 and 19</p>
			<p><b>Stormwater and surface water run-off:</b> Potential for contaminated stormwater and small metal waste products to enter infiltration soakwells</p>	<p>Soakwells to be fitted with polypropylene drain wardens to prevent hydrocarbons infiltrating groundwater.</p> <p>Drain wardens and hydrocarbon absorbent booms will be monitored weekly to ensure they remain in place, are under capacity and are undamaged.</p>	Moderate	Possible	Medium	<p>Hydrocarbon absorbent booms and drain wardens when used together should be sufficient to prevent hydrocarbon contaminated stormwater infiltrating groundwater.</p> <p>Weekly monitoring of hydrocarbon absorbent booms and drain wardens will be required to ensure that the infrastructure is working effectively.</p>	<p>Conditions 12, 13, 14, 15, 16, 17, 18, 19 and 21</p>

Risk Event					Consequence rating	Likelihood rating	Risk	Reasoning	Regulatory controls (refer to conditions of the granted instrument)
Source/Activities	Potential emissions	Potential receptors	Potential pathway & receptor (impact)	Applicant controls					
				<p>Drain wardens catch metal fragments and will be replaced if damaged or at full capacity.</p> <p>Soakwells to have hydrocarbon absorbent bunds placed around drains to further prevent hydrocarbons entering soakwell network.</p> <p>Bi-annual monitoring of groundwater to be undertaken.</p>				Monitoring of groundwater will affirm the effectiveness of hydrocarbon absorbent boom and drain warden usage.	
Operation of equipment involved in metal recycling process	<p><b>Noise:</b> truck movements and reversing alarms</p> <p>Unloading of metal waste onto hardstand</p> <p>Processing and stockpiling of materials</p>	<p>Adjacent industrial Premises</p> <p>Residential properties 900m south west of Premises</p> <p>Nearby Threatened and Priority Fauna associated with Bushforever sites 424 and 283</p>	<b>Air:</b> health and amenity impacts	<p>Site operation hours limited to 7:00am to 4:00pm Monday – Friday, and 8:00am – 12:00pm Saturday.</p> <p>Regular servicing of machinery.</p> <p>Complaints registered maintained and actioned.</p> <p>Speed restrictions (5kph) apply on-site.</p>	Slight	Rare	Low	<p>Nearest residential property is 900m away and unlikely to be impacted by noise generated by site operations.</p> <p>Noise arising from site operations will be subject to the EP Noise Regulations.</p>	<p>Conditions 7 and 12</p> <p>Noise emissions must comply with the EP Noise Regulations.</p>
	<p><b>Dust:</b> truck movements</p> <p>Unloading of waste onto hardstand</p> <p>Processing and stockpiling of materials</p>	<p>Adjacent industrial Premises</p> <p>Banksia Road stormwater compensation basin east of Premises</p> <p>Residential properties 900m south west of Premises</p>	<b>Air:</b> health and amenity impacts	<p>All vehicle movements and unloading occurs on a concrete hardstand.</p> <p>Regular sweeping of hardstand.</p> <p>Speed restrictions (5kph) apply on site.</p> <p>Water tanks will be brought to site as required.</p>	Minor	Unlikely	Medium	<p>Slow vehicle movements on a concrete hardstand that is regularly swept will not produce large quantities of dust</p> <p>Metal wastes do not generally produce large amounts of dust and a water tank will be brought on-site to manage any dust lift-off from stockpiles if required.</p> <p>Small localised dust generation may occur.</p>	Condition 10
Storage of metal waste materials on the Premises	<p><b>Fire incident risk:</b> smoke, including particulates and air emissions containing hydrocarbons and heavy metals released in the event of a fire.</p>	<p>Banksia Road stormwater compensation basin east of Premises</p> <p>Perth Groundwater Area – Premises located within mapped area (see Table 5)</p>	<b>Air:</b> health and amenity impacts	<p>Network of fire hydrants, fire hoses and a 100-kL water cannon available on-site for fire suppression.</p> <p>Limited acceptance of flammable and combustible materials to site.</p> <p>Hot work permits to be utilised for activities likely to present a fire risk eg. Oxy-cutting.</p> <p>Site personnel trained in fire prevention as per submitted 'safe work procedure' plans.</p>	Major	Unlikely	Medium	<p>The Applicant has provided confirmation issued by the Department of Fire and Emergency Services (DFES) that an inspection was undertaken by DFES officers on 27 April 2017 and that at the time of inspection the installed fire safety systems met DFES operational requirements.</p> <p>The Applicant has also provided a 'safe work procedure – fire prevention' plan which is to be followed at all times by site personnel.</p>	<p>Conditions 12 and 20</p> <p>General provisions of the EP Act may also apply in the event of a fire incident.</p>
	<p><b>Fire incident risk:</b> Firefighting wash-water may contain hazardous materials including surfactants, heavy metals, hydrocarbons emulsifiers and modifiers.</p>	<p>Green Growth Wetlands – Southern River Complex 270m south of Premises</p>	<b>Surface water run-off:</b> Contamination with hazardous materials generated from extinguishing a potential fire	<p>Limited details have been provided in relation to the management of fire wash-water following a fire incident.</p> <p>The Applicant has indicated that fire wash-waters will be prevented from entering the stormwater infrastructure by using the absorbent booms placed around the stormwater sumps.</p>	Major	Unlikely	Medium	<p>DWER considers that use of absorbent booms around stormwater sumps will only provide limited control for potentially impacted wash-waters entering into the stormwater system (and subsequently infiltrating to ground) in the event of a fire.</p>	<p>Conditions 12 and 20</p> <p>General provisions of the EP Act and CS Act may also apply in the event of a fire incident.</p>

## Consultation

**Table 9:** Consultation notes

Method	Comments received	DWER response
Application advertised on DWER website	None received	NA
Direct interest stakeholders notified	Refer to Appendix 2	Refer to Appendix 2
Applicant notified of draft – 21 day referral period	<p>The Applicant confirmed that the 31 August 2019 allowed for an achievable timeframe to:</p> <ul style="list-style-type: none"> <li>Remove material from the Oxy-area as defined by Figure 1;</li> <li>Remove all tyres from the Premises; and</li> <li>Install the drain wardens and absorbent booms.</li> </ul> <p>The Applicant provided outstanding information that was highlighted in the provided drafts.</p> <p>The Applicant provided alternative wording regarding 'Compliance inspections and Compliance history' – requested 'the site' be reworded to 'the operator's previous site on Felspar Street, Welshpool'</p> <p>The Applicant highlighted small grammatical and formatting areas that needed correcting.</p>	<p>Minor amendments to the Licence and Decision Report were made to include additional information provided and correct formatting and grammatical errors.</p> <p>Wording changed to Applicants preferred wording.</p>

## Conclusion

This assessment of the risks of activities on the Premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this decision report (summarised in Appendix 3). This assessment was also informed by a site inspection by DWER officers on 1 May 2019.

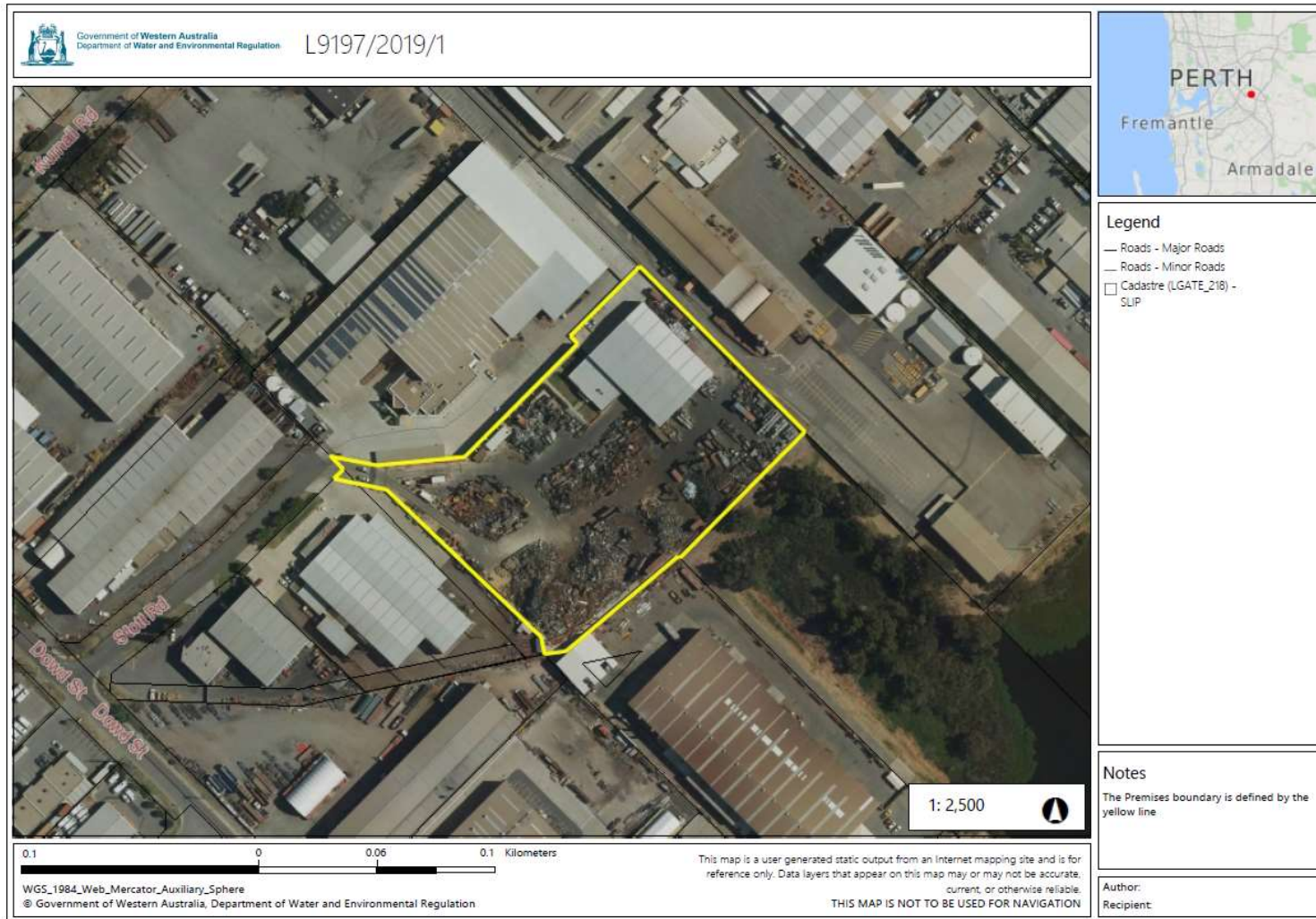
Based on this assessment, it has been determined that the Issued Licence will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

DWER notes that it may review the appropriateness and adequacy of controls at any time and that, following a review, DWER may initiate amendments to the approval under the EP Act.

### **A/MANAGER WASTE INDUSTRIES REGULATORY SERVICES**

Delegated Officer under section 20 of the *Environmental Protection Act 1986*

## Appendix 1: Premises maps



**Figure 2: Prescribed Premises boundary**

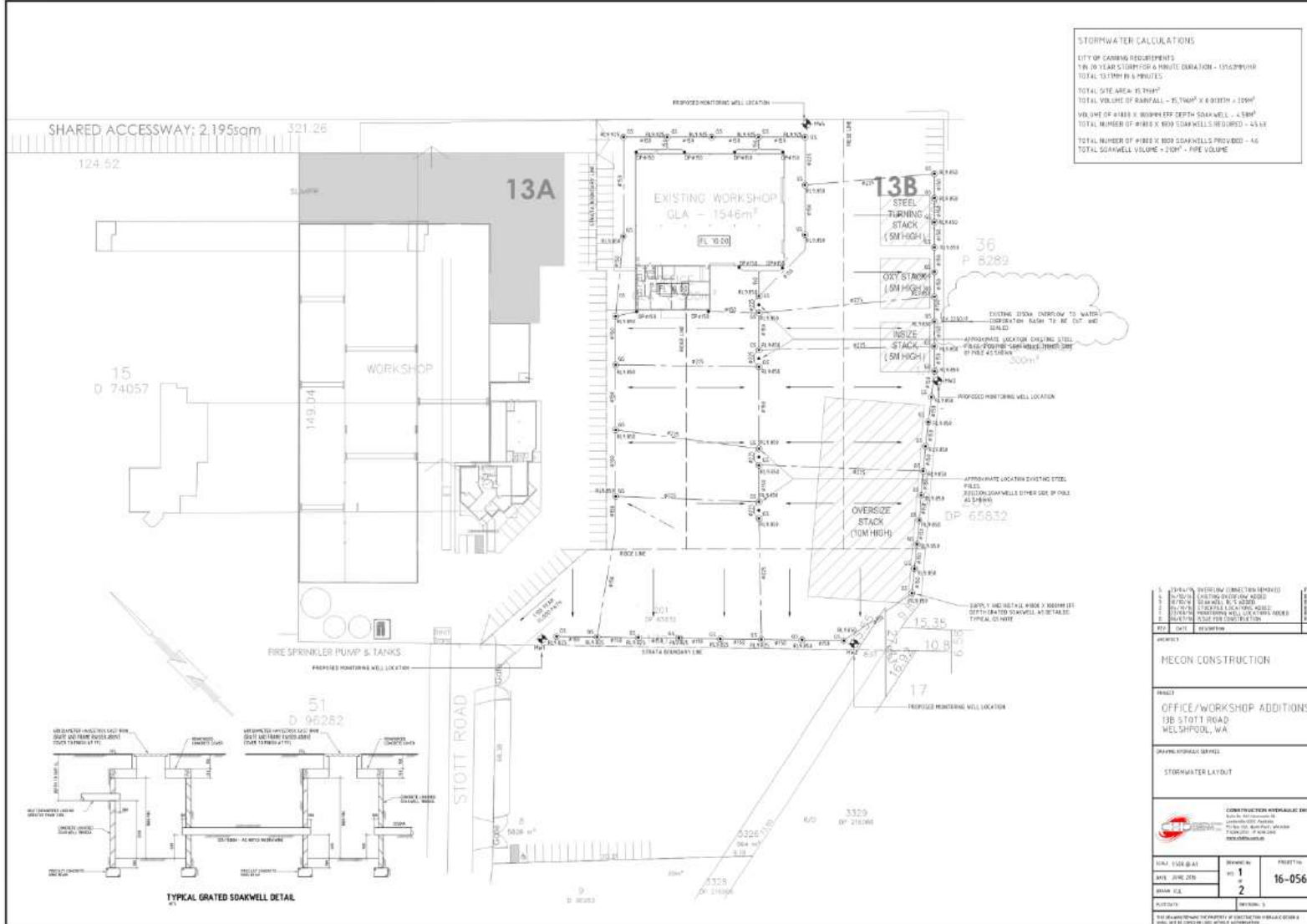


Figure 3: Stormwater management system





**Figure 4: Groundwater monitoring well locations**



**Figure 5: Soil sampling locations**

## Appendix 2: Summary of consultation comments

### Direct Interest Stakeholder consultation

Person	Comment	DWER response
City of Canning – comments received 4 June 2019	The connection that discharges stormwater directly into the compensation basin should be disconnected.	The Applicant has advised that the connection to the compensation drainage basin has been disconnected.
	Stormwater that lands on the storage areas is not isolated or captured but instead is allowed to discharge directly into the stormwater system. Scrap is being accepted to the site and not being stored in an area to contain stormwater.	The soakwell infiltration system is fitted with hydrocarbon absorbent booms and drain wardens to prevent hydrocarbons entering the groundwater. These are to be regularly inspected and replaced if damaged or at capacity. Groundwater is subject to bi-annual monitoring. The Delegated Officer considers these controls to be adequate to mitigate and monitor potentially contaminated stormwater entering the environment.
	Stormwater drains are not accessible due to being located underneath stockpiles, thereby making it impossible to inspect, clean or prevent discharges reaching the drains.	The Licence holder has advised that the Oxy-area stockpile will be removed by 31 August 2019 to allow access to soakwells for installation of stormwater controls. Drain wardens will also catch small metal fragments. Improvement conditions have been specified in the Licence to ensure that materials are moved by the indicated date. The Delegated officer considers these Conditions adequate to mitigate the potential for metal fragments to enter the stormwater system and to mitigate and monitor potentially contaminated stormwater entering the environment.
	Noise should be considered to be an emission	Noise arising from site operations will be subject to the EP Noise Regulations.
Department of Fire and Emergency Services	None received	No action required
Water corporation		
Emergency Services Complex		

## Appendix 3: Key documents

Document title	In text ref	Availability
DES, July 2019, <i>Best practice environmental management guideline for scrap metal recycling facilities operating fragmentisers</i> , Department of Environment and Science, Queensland.	N/A	accessed at <a href="http://www.environment.des.qld.gov.au">www.environment.des.qld.gov.au</a>
EPA, June 2017, <i>Proposal for minimum environmental standards in the scrap metal industry</i> , Environmental Protection Authority, NSW.	N/A	accessed at <a href="http://www.epa.wa.gov.au">www.epa.wa.gov.au</a>
VACC, November 2014, <i>Automotive Environmental Guide</i> , Victorian Automotive Chamber of Commerce, VIC.	N/A	accessed at <a href="http://www.vacc.com.au">www.vacc.com.au</a>
DER, July 2015. <i>Guidance Statement: Regulatory principles</i> . Department of Environment Regulation, Perth.	DER 2015a	accessed at <a href="http://www.dwer.wa.gov.au">www.dwer.wa.gov.au</a>
DER, October 2015. <i>Guidance Statement: Setting conditions</i> . Department of Environment Regulation, Perth.	DER 2015b	
DER, August 2016. <i>Guidance Statement: Licence duration</i> . Department of Environment Regulation, Perth.	DER 2016a	
DER, November 2016. <i>Guidance Statement: Risk Assessments</i> . Department of Environment Regulation, Perth.	DER 2016b	
DER, November 2016. <i>Guidance Statement: Decision Making</i> . Department of Environment Regulation, Perth.	DER 2016c	