Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L9304/2021/1
Licence Holder	Shire of Ashburton
Application Number	APP-0032491
Internal Number	INS-0002035
Premises	Pilbara Regional Waste Management Facility Onslow Road TALANDJI WA 6710 Legal description – Lot 550 and 551 on Deposited Plan 414367, being Reserve 53324 Certificate of Title Volume LR3169, Folio 963 As defined by the remises map provided in Schedule 1, Figure 1 of the licence
Date of Report	27 January 2026
Decision	Revised licence granted

Table of Contents

1. Decision summary

Licence L9304/2021/1 (L9304) is held by Shire of Ashburton (Licence Holder) for the Pilbara Regional Waste Management Facility (the Premises), located at Lot 550 and Lot 551 on Plan 414367, being Reserve 53324, Onslow Road Talandji.

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 L9304 has been granted.

The Revised Licence issued because of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises. The Revised Licence has been granted in a new format with existing conditions being transferred, but not reassessed, to the new format.

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 14 November 2025, the Licence Holder applied to the department to amend Licence L9304 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

DWER granted Works Approval W6799/2023/1 to the Shire of Ashburton (the Licence Holder) on 20 November 2023 for the construction and time limited operation of three evaporation ponds and two drying beds at the premises. The works have been partially completed (two evaporation ponds and one drying bed constructed), and the infrastructure is currently being operated under Time Limited Operation (TLO) provisions of the Works Approval.

On 23 October 2024, the Shire submitted a Critical Containment Infrastructure Report (CCIR) to DWER confirming that the construction and Construction Quality Assurance of Evaporation Ponds 1 and 2 and Drying Bed 1 had been completed. DWER confirmed on 1 November 2025 that the CCIR met the requirements of the works approval and that TLO of the infrastructure could commence.

This Licence amendment application seeks authorisation for the operation of the two Evaporation Ponds and single Drying Bed through licence conditions prior to 26 January 2026, as that is the expiry date for TLO under W6799/2023/1. A summary of amendments considered under this assessment for addition to the Licence are as follows:

- Operation of Evaporation Ponds 1 & 2 and Drying Pad 1 constructed under Works Approval W6799/2023/1;
- Incorporation of waste acceptance, characterisation and processing requirements current conditioned through the Works Approval;
- The addition of the use of mobile mixing tanks for the blending and neutralisation processes within the drying bed; and
- Administrative amendments to correct unintentional errors within Licence L9304.

Additionally, an amendment to increase the premises throughput from 50,000 tonnes per annum to 80,000 tonnes per annum for Class III and IV waste acceptance was sought through this

amendment application. The Delegated Officer determined through the assessment of the application that further information was required to inform the risk assessment for this activity, which would not be able to be prepared by the Licence Holder and subsequently reviewed by the Department by the 26 January 2026. To ensure the amended Licence would be granted to permit ongoing operation of the Evaporation Ponds and Drying Pad, this request was removed from the scope of this amendment application in negotiations with the Licence Holder. The Licence Holder will seek an increase to premises throughput through a separate amendment application.

To incorporate waste acceptance and processing and the operation of the evaporation ponds and drying pad onto the Licence, the following changes to the current premises design capacity are proposed through this amendment as outlined in Table 1.

Table 1: Changes to Licence design capacity

Category	Current design capacity	Proposed design capacity	Summary of changes
Category 13	50,000 tonnes per annual period	50,000 tonnes per annual period	No change
Category 57	No more than 500 tyres at any time	No more than 500 tyres at any time	No change
Category 61	1,000 tonnes per annual period	22,000 tonnes per annual period	Increase to incorporate throughput reflected on works approval W6799/2023/1
Category 61A	20,000 tonnes per annual period	40,000 tonnes per annual period	Increase to incorporate throughput reflected on works approval W6799/2023/1
Category 62	100,000 tonnes per annual period	100,000 tonnes per annual period	No change
Category 63	50,000 tonnes per annual period	50,000 tonnes per annual period	No change
Category 64	50,000 tonnes per annual period	50,000 tonnes per annual period	No change
Category 65			

2.3 Addition of mobile mixing tanks

The Licence Holder is seeking additional approval through this amendment application to undertake blending and neutralisation processes currently authorised to be carried out on the drying pad through use of mobile mixing tanks. The tanks would have a combined maximum capacity of 75 m^3 and would be brought to the premises on an as-needed basis to allow for more efficient mixing of wastes, which would otherwise be undertaken in individual containers. The temporary use of a mixing tank on the drying pad is not anticipated by the Licence Holder to impact the risk associated with processing activities, considering the controls associated with the containment infrastructure.

The proposed equipment is a hired, temporary mixing tank not proposed to be permanently installed. The tank will be hired only when required for specific projects and removed from site once the project is completed. Mixing within the tank is achieved via compressed air injection

through internal air lines, allowing controlled agitation where required. The mixing tank will be used to manage single-stream controlled waste types only. Multiple waste types will not be accepted, stored or treated concurrently. Each treatment campaign will involve a single approved waste stream, and the tank will be fully emptied, inspected and verified clean prior to use for any subsequent project.

The controlled waste categories proposed to be managed using the mixing tank include:

- Corrosive / basic / acidic liquids (B100, C100)
    - Neutralisation will be undertaken inside the mixing tank in a contained manner. pH will be monitored using calibrated instruments. Once the target pH range is achieved and confirmed to be stable, the treated industrial liquid will be transferred to the evaporation ponds for water recovery.
- Industrial sludges (N205)
    - Industrial sludge will be discharged into the mixing tank and allowed to settle under gravity. Settling will be visually confirmed using external level indicators. Supernatant water will be decanted from the upper layer, reducing the overall volume of sludge. The concentrated sludge fraction will then be removed and managed through appropriate treatment or disposal pathways.
- Oils and hydrocarbons (J100, J130, J180)
    - Waste oils and oily waters will be transferred into the mixing tank and allowed to gravity separate. Free water will be drained from the base of the tank and recovered oil removed from the top. Recovered oil can then be sent for recycling.
- Inorganic and industrial chemical liquids (D120, D130, D140, D160, D170, D180, D190, D200, D210, D230, D240, D250, D270, D300, D310)
    - Salt solutions will be introduced into the tank and allowed to stratify. Salinity and dissolved solids will be assessed at different levels within the tank. Lower salinity liquid may be transferred to evaporation ponds, while higher salt fractions will be kept in the drying pad for further treatment.

Controls to prevent the mixing of incompatible waste types include:

- Acceptance of one controlled waste stream per project only.
- Submission and approval of a Waste Acceptance Application and supporting laboratory data prior to receipt.
- Physical isolation of the tank within the drying pad footprint.
- Complete emptying, inspection and verification of the tank prior to reuse.
- No co-mingling of different waste streams under any circumstances.

All activities associated with the mixing tank will be undertaken entirely within the existing drying pad footprint. The drying pad is designed to contain liquids and prevent environmental release. Specific controls include:

- Placement of the tank on a lined drying pad
- Pre-use inspection of the tank and fittings
- Routine inspection of hoses, valves and air lines during operation
- Supervision during transfer, mixing and decanting activities
- Daily inspections conducted across the premises

- Spill response equipment available on site at all times
- Immediate clean-up of any spills or leaks in accordance with site procedures.

Further detail on operation and infrastructure controls relating to the use of the mixing tanks is provided in Section 3.1.1 below.

2.4 Other administrative amendments

The Licence Holder is required under current Licence conditions to have submitted to the CEO by 22 December 2025 a consolidated Landfill Gas Management Plan and Risk Assessment. Through this amendment application, the Licence Holder has requested an extension of this due date by one year as the preparation of the report has been delayed. The Delegated Officer will consider this request within the scope of this amendment application, noting that the non-submission of the assessment by the original due date constitutes a technical non-compliance with Licence submission requirements.

Additionally, the Licence Holder has requested the removal of the instantaneous monitoring requirement for Standing Water Level, as this monitoring was only required for a period of 24 months after the licence was initially issued. However, as this monitoring requirement relates to the submission of sampling data (outlined in condition 44 of the existing licence), the Delegated Officer is unable to remove this requirement until the obligations within condition 44 have been completed.

A summary of amendments proposed for incorporation into the Licence is outlined in Section 5.1 below.

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

Emission	Sources	Potential pathways	Proposed controls
Dust	Acceptance, storage and processing of additional waste types Vehicle movements	Air/windborne pathway	Low vehicle speeds. Dust suppression using water cart. Cessation of dusty operations when weather conditions are adverse. Waste loads being covered at all times.

Emission	Sources	Potential pathways	Proposed controls
	Mobile Mixing Tank operation		Operational Environmental Management Plan.
Noise	Acceptance, storage and processing of additional waste types Vehicle movements Mobile Mixing Tank operation	Air/windborne pathway	Physical separation from sensitive receptors. Low vehicle speeds. Compliance with *Environmental Protection (Noise) Regulations 1997*. Mixing is achieved via air compression internally within the sealed tank.
Odour	Acceptance, storage and processing of additional waste types Mobile Mixing Tank operation	Air/windborne pathway	Physical separation from sensitive receptors. Operational Environmental Management Plan. Monitoring of odour by site staff. Where required lime-dosing the ponds to adjust the liquid waste pH. Covering of waste on the drying pads. Cease acceptance of particularly odorous wastes if identified as being the cause of excessive odours. Mixing tank is hired on a campaign bases – it is not permanent infrastructure. It will be delivered and removed from site. Mixing is achieved via air compression internally within the sealed tank. Mobile mixing tank will be used to manage single stream-controlled waste types – multiple streams will not be mixed therefore reducing odour potential. Mobile mixing Tank will be fully emptied, inspected and verified clean prior to subsequent mixing of waste.
Leachate	Acceptance of various liquid wastes. Waste spills. Operation of evaporation ponds and drying beds. Mobile Mixing Tank operation	Surface runoff via pond overflow causing ecosystem disturbance. Liner failure and seepage.	Evaporation pond is: • Constructed of a geosynthetic clay liner (GCL) and 2 mm HDPE geomembrane. • Liner system free of leaks and defects and designed to achieve a minimum coefficient of permeability of 3 x 10^{-11} m/s.or equivalent • constructed a minimum of 3.0 m above groundwater level. • Able to maintain operating depth of 2.0 m in the shallow end and 3.0 m in the deep end with 0.5 m freeboard. • Pond sumps.

Emission	Sources	Potential pathways	Proposed controls
			• Prefabricated HDPE discharge apron to convey liquid waste into the evaporation ponds bolted to the concrete structure Critical containment infrastructure construction quality assurance testing. • Discharge structure that incorporates a sump for the collection of solid material received in the liquid waste Drying bed is: • constructed of a geosynthetic clay liner (GCL) and 2 mm HDPE geomembrane. • Liner system designed to achieve a minimum coefficient of permeability of 3 x 10^{-11} m/s. • To be constructed a minimum of 3.0 m above maximum seasonal groundwater level. • Base constructed with minimum 1% fall towards leachate extraction sump. • To be constructed to achieve an operating depth of 0.5 m and a 0.5 m freeboard. • In-built leachate collection system and leachate collection sump. A 3 m firebreak is maintained around the ponds to prevent damage to liner. Earthen perimeter bunds and stormwater trench drains. Operational Environmental Management Plan. Mixing tank is hired on a campaign bases – it is not permanent infrastructure. It will be delivered and removed from site. Mobile mixing Tank will be fully emptied, inspected and verified clean prior to subsequent mixing of waste. The mobile mixing tank will be located in the drying pad footprint which is lined and contains a sump to direct stormwater away from the bed.
Spills / Leaks	Acceptance of various liquid wastes. Waste spills. Operation of evaporation ponds and drying beds. Mobile Mixing Tank operation	Surface runoff. Liner failure and seepage.	Evaporation Pond and Drying Bed has installation of a GCL and HDPE liner system. Critical containment infrastructure construction quality assurance testing. Maintenance of a 0.5 m freeboard in ponds and beds to hold a 1% 168-hour/7-day storm event. A 3 m firebreak is maintained around the ponds to prevent damage to liner. Earthen perimeter bunds and stormwater trench drains. Spill response kits of a suitable size are placed

Emission	Sources	Potential pathways	Proposed controls
			in/nearby appropriate locations around the site. Operational Environmental Management Plan. Mixing tank is a sealed tank. Mixing Tank will be located within the Drying Bed which is lined. Mobile mixing Tank will be fully emptied, inspected and verified clean prior to subsequent mixing of waste
Contaminated Stormwater	Acceptance of various liquid wastes. Waste spills. Operation of evaporation ponds and drying beds. Mobile Mixing Tank operation	Surface runoff. Liner failure and seepage	Installation of a GCL and HDPE liner system Critical containment infrastructure construction quality assurance testing. Maintenance of a 0.5 m freeboard in ponds and beds to hold a 1% 168-hour/7-day storm event. A 3 m firebreak is maintained around the ponds to prevent damage to liner. Earthen perimeter bunds and stormwater trench drains. Flood modelling. Diverting stormwater to drains and attenuation ponds to allow for the controlled release to the surrounding environment. Levee embankment extending around the southern perimeter of the premises. Swale system to manage surface water volume and flow velocity. Rock armoring of potential scour surfaces. Perimeter drains and surface water retention ponds. Operational Environmental Management Plan. Mixing tank is a sealed tank. Mixing Tank will be located within the Drying Bed which is lined. Mobile mixing Tank will be fully emptied, inspected and verified clean prior to subsequent mixing of waste.
Toxic fumes, fire, or explosion	Chemical reaction from the mixing of incompatible waste types in the drying beds or mixing tanks.	Air/windborne pathway causing impacts to health and amenity. Direct impacts.	Physical separation from sensitive receptors. Incompatible materials will not be stored or processed in close proximity. Incompatible wastes placed on the drying beds will not be blended. Wastes placed in the mixing tanks will be managed through: • Acceptance of one controlled waste stream

Emission	Sources	Potential pathways	Proposed controls
			per project only. • Submission and approval of a Waste Acceptance Application and supporting laboratory data prior to receipt. • Physical isolation of the tank within the drying pad footprint. • Complete emptying, inspection and verification of the tank prior to reuse. • No co-mingling of different waste streams under any circumstances.

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 because 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
Pastoral stations and leases	Lands used for agricultural purposes (grazing) on Minderoo and Peedamulla station extend from ~3.2 km west and ~8 km north of the premises. Minderoo Station homestead is located ~20 km south-west of the premises. Peedamulla Station homestead and campground are located ~40km east northeast of the premises.
Onslow town site and industrial areas	Wheatstone oil and gas worker accommodation is located ~22 km north-west of the premises. Onslow town site is located ~30 km north-west of the premises.
Users of Conservation Park (existing and proposed)	The proposed extension to the Cane River Conservation Park (CRCP) includes all lands surrounding the premises except easements associated with the Onslow Road and associated infrastructure. The boundary of the proposed extension to the CRCP is located between 150 and 1,500 m from the PRWMF infrastructure.
Environmental receptors	**Distance from prescribed activity**

Cane River Conservation Park (CRCP)	Current: located approximately 32 km south-east. Proposed extension: surrounding the premises, between approximately 150 m and 1,500 m from the PRWMF infrastructure. No management plan has been published for the existing or proposed extension to the CRCP. Consistent with section 56 of the CALM Act, the purpose of conservation parks is to conserve the natural environment, protect flora and fauna and preserve features of archaeological, historic or scientific interest while providing for suitable levels of public recreation.
Public Drinking Water Source Area (PDWSA) under the *Country Areas Water Supply Act 1947*	The Cane River Water Reserve Priority 1 PDWSA is located approximately 21.1 km north-east (up-gradient) of the premises.
Surface Water: River systems	The premises is located along the divide of the Ashburton River and Cane River catchment which discharges into the Ashburton River catchment. Ashburton River: Approximately 20.5 km west of the premises (down-gradient). Cane River: Approximately 22 km north-east of the premises (up-gradient)
Surface Water Resource Proclaimed Area	Surface Water Area which is proclaimed area under the RIWI Act. The premises is specifically located within the Ashburton River surface water resource proclaimed portion. Surface water areas are proclaimed for the purposes of regulating the taking of water from watercourses and wetlands and where there is a need for systematic management for the use of water.
Surface water bodies	A series of non-perennial lakes are situated to the west (down-gradient), south-west (up-gradient) and north-east (up-gradient) of the premises. The closest of these is located approximately 2.3 km west of the premises. Beyond these is a series of Saline Coastal Flats which extend towards the Indian Ocean.
Threatened Ecological Communities (TEC) (buffers)	The closest TEC buffer, being Tanpool land system, is situated 36.8 km north-east of the premises. A Tanpool land system is a “highly restricted land system that occurs between Pannawonica and Onslow. It consists of stony plains and low ridges of sandstone and other sedimentary rocks supporting hard spinifex grasslands and snakewood shrublands” (DBCA, 2017), with a Priority 1 category rating.
Indian Ocean	Approximately 40.3 km north-west (down-gradient) of the premises.
Groundwater: superficial and confined	The premises is located with the Carnarvon confined

aquifers	Birdrong aquifer and Carnarvon superficial aquifer. Talis (2018a) reported that the superficial aquifer was not encountered during intrusive investigations at the premises. Depth to groundwater ranges across the premises from 5.4 metres below ground level (m BGL) (BH03 January 2018) to 20.9 m BGL (BH10 April 2019) Groundwater dependent ecosystems have not been investigated within the unallocated crown land surrounding the premises, proposed as an extension to the CRCP, for the purposes of the risk assessment they are assumed to be potentially present.
Users of groundwater resources	The premises is located within the RIWI Act proclaimed Pilbara Groundwater Area. Groundwater licences are granted ~20 km south-west (Ashburton River – bore is up-gradient), ~27 km north-east (Cane River – up-gradient) and from ~16 km north-west (down-gradient) of the premises. A series of licences are also granted along the Onslow Road from ~5 km north-west (up-gradient) and ~1 km south-east (up-gradient) that are predominately granted to Main Roads Western Australia. Groundwater may also be used for stock water on nearby pastoral stations.

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 in-complete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where 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 L9304 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 from the Premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Vehicle movements associated with waste acceptance	Dust	Air/windborne pathway causing impacts to health and amenity	Human Receptors: Users of CRCP and Onslow Road Environmental Receptors: Terrestrial environment within the CRCP	Refer to Section 3.1	Human Receptors: C = Minor L = Rare **Low Risk** Environmental Receptors: C = Minor L = Rare **Low Risk**	Y	N/A	N/A
	Noise	Air/windborne pathway causing impacts to health and amenity	Human Receptors: Users of CRCP and Onslow Road Environmental Receptors: Terrestrial environment within the CRCP	Refer to Section 3.1	Human Receptors: C = Minor L = Rare **Low Risk** Environmental Receptors: C = Minor L = Rare **Low Risk**	Y	N/A	N/A
Acceptance of additional wastes to the evaporation ponds Operation of evaporation ponds and drying pad	Odour	Air/windborne pathway causing impacts to health and amenity	Users of CRCP and Onslow Road	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	N/A	N/A
	Leachate	Pathways Overland flow due to overtopping of leachate storage ponds or failure of	Human Receptors: Beneficial users of groundwater (including future users)	Refer to Section 3.1	Human Receptors: C = Major L = Possible	Y	Condition 1 -11, 22, 23, 32, 33-36, 38-43 and 49-54.	N/A

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
		leachate conveyance infrastructure. Overland runoff (from stormwater migration). Infiltration and subsequent movement on contaminants through groundwater. Abstraction and use of groundwater – direct exposure. Impacts Deterioration and/or contamination of waters and local/regional aquatic ecosystems. Deterioration of conservation values of CRCP.	Environmental Receptors: Non-perennial surface waters. Terrestrial habitats including the proposed extension of the CRCP (150 -1,500 m from premises) including native flora and groundwater dependent vegetation.		**High Risk** Environmental Receptors: C = Major L = Unlikely **Medium Risk**			
	Spills / Leaks	Overland runoff, movement through groundwater causing contamination of waters or degradation of local/regional surface water ecosystems, degradation to the beneficial use of	Human Receptors: Users of CRCP and Onslow Road beneficial users of groundwater (including future users) Environmental Receptors: Terrestrial environment within the	Refer to Section 3.1	Human Receptors: C = Major L = Rare **Medium Risk** Environmental Receptors: C = Major L = Rare	Y	Condition 9, 10, 11 and 49	N/A

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
		groundwater, health impacts to groundwater users, and/or impacts to conservation values of the CRCP.	CRCP		**Medium Risk**			
	Contaminated stormwater	<u>Pathways</u> Overland flow due to overtopping of leachate storage ponds or failure of leachate conveyance infrastructure. Overland runoff (from stormwater migration). Infiltration and subsequent movement on contaminants through groundwater. Abstraction and use of groundwater – direct exposure. <u>Impacts</u> Deterioration and/or contamination of waters and local/regional aquatic ecosystems. Deterioration of conservation values of CRCP.	<u>Human Receptors:</u> Beneficial users of groundwater (including future users) <u>Environmental Receptors:</u> Non-perennial surface waters Terrestrial habitats including the proposed extension of the CRCP (150 -1,500 m from premises) including native flora and groundwater dependent vegetation	Refer to Section 3.1	<u>Human Receptors:</u> C = Major L = Rare **Medium Risk** <u>Environmental Receptors:</u> C = Major L = Rare **Medium Risk**	Y	Condition 6, 9, 10 and 11, 32 and 49.	N/A

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Chemical reaction from the mixing of incompatible waste types	Toxic fumes, fire, or explosion	Air / windborne pathway causing impacts to health and amenity	Human Receptors: Users of CRCP and Onslow Road Environmental Receptors: Terrestrial environment within the CRCP	Refer to Section 3.1	Human Receptors: C = Major L = Rare **Medium Risk**	Y	Condition 9	N/A

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
Application advertised on the department's website on 6/1/2026.	Comment due 27/1/2026. One Public Comment received 11 January 2026 – refer to Appendix 1	Noted – refer to Appendix 1.
Department of Mines, Petroleum and Energy (DMPE) advised of proposal on 6 January 2026	Due 20/1/26 DMIRS did not respond.	Noted
Department of Biodiversity, Conservation and Attractions (DBCA) advised of proposal on 6 January 2026	Due 20/1/26 DBCA did not respond	Noted
Department of Plans, Land and Heritage (DPLH) advised of proposal on 6 January 2026	Due 20/1/26 DPLH did not respond	Noted
Licence Holder was provided with draft amendment on 19 January 2026	Licence Holder responded on 21 January 2026 Refer to Appendix 2	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. The provision of new conditions into the Existing Licence has resulted in licence condition number changes to the existing conditions – the underlined condition in Table 6 provides the new condition number in the Proposed Licence as applicable.

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
N/A	Amend the correct registered business address. The correct registered business address for Licence Holder is: *Lot 246 Poinciana Street, TOM PRICE WA 6751.*
N/A Licence assessed production / design capacity	Category 61 throughput increased from 1,000 tonnes per annual period to 22,000 tonnes per annual period. Category 61A throughput increased from 20,000 tonnes per annual period to 40,000 tonnes per annual period
Condition 1 Table 1	Amend Condition 1, Table 1 of the Existing Licence to include the waste types, quantities and acceptance specifications as listed in Condition 9, Table 3 of the works approvals W6799 with the addition of non-toxic salts (controlled waste code D300) to the types of waste accepted in the evaporation pond.
Proposed Condition 2	Amend the Existing Licence to include condition 10 from works approval W6799 into waste acceptance conditions in the Licence.
Proposed Condition 3	Amend the Existing Licence to include condition 11 from works approval W6799 into waste acceptance conditions in the Licence.
Proposed Condition 4	Amend the Existing Licence to include condition 12 from works approval W6799 into waste acceptance conditions in the Licence.
Proposed Condition 5	Amend the Existing Licence to include condition 13 from works approval W6799 into waste acceptance conditions in the Licence.
Proposed Condition 7	Amend the Existing Licence to include condition 15 from works approval W6799 into waste characterisation conditions in the Licence.
Proposed Condition 8	Amend the Existing Licence to include condition 16 from works approval W6799 into waste characterisation conditions in the Licence.
Existing Condition 3 Table 2 Proposed Condition 9 Table 3	Amend Condition 3, Table 2 of the Existing Licence to include the waste processing requirements specified in Condition 17, Table 4 of works approval W6799. Incorporation of condition to permit the use of mobile mixing tanks within the drying pad area.
Proposed condition 10	Amend the Existing Licence to include condition 18 from works approval W6799 into waste processing conditions the Licence.
Proposed condition 11	Amend the Existing Licence to include condition 19 from works approval W6799 into waste processing conditions the Licence.
Existing Condition 20 Proposed Condition 28	Amend condition 20 to remove sub-condition (c) - the requirement of periodic deployment of camera traps for feral animal control. Other management actions are sufficient to control feral animals at the premises, including use of Shire Rangers, pest bating and trapping, annual survey and quarterly and weekly inspections.

Existing Condition 24 Table 4 Proposed Condition 32 Table 4	Operation of Evaporation Ponds 1 and 2 and Drying Bed 1 – Add Condition 8 Table 2 of works approval W6799 into the Existing Licence.
Existing Condition 40 Proposed Condition 48	Amend condition 40 Landfill Gas Management Plan (LGMP) submission date from 22 December 2025 to 22 December 2026.
Definitions	Addition of the following three (3) new definitions into the Licence: ▪ Controlled waste - has the meaning as defined within the *Environmental Protection (Controlled Waste) Regulations 1994.* ▪ Leachate - means liquid released by, or water that has percolated through, waste and which contains some of the constituents of the waste. ▪ Packaged - has the meaning as defined within the *Environmental Protection (Controlled Waste) Regulations 1994.* The Licence Holder requested that 'Solid' be added to the Definitions table - *Solid - has the meaning defined in the Landfill Definitions* - but the existing licence already has this definition.
Schedule 1 Figure 2	Update Figure 2 of the licence to replace the infrastructure location plan with the amended version provided in the Application.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

Appendix 1: Summary of Public Comments on the Amendment Application

Condition	Summary of Public submission	Department's response
1	Increasing Category 64 / 65 P&DC from 50,000 Tonnes per annual period to 80,000 tonnes per annual period raises several environmental issues.	Amendment request withdrawn by Licence Holder 19 January 2026.
39	Concerns raised relating to a reducing in groundwater monitoring.	The existing licence condition only required Instantaneous monitoring for 24 months from issue of the licence. This timeframe has expired as the licence was issued on 22/12/2021. Groundwater monitoring is still required monthly on the licence in Table 7 as is provision of all groundwater data – if any issues are identified in the future, suitable conditions can be added to the licence via an amendment as applicable.
28	Removal of Camera-Trap Requirement for Feral-Animal Control. Camera traps provide independent, systematic data on feral-animal activity patterns and are recognised by the Western Australia Department of Biodiversity, Conservation and Attractions as a best-practice monitoring tool for invasive species. Their removal reduces the robustness of the feral-animal management programme and may lead to undetected incursions that could increase soil disturbance, waste scattering, and fire risk. Recommendation: Retain the camera-trap requirement or, alternatively, provide a scientifically validated substitute monitoring protocol (e.g., motion-sensor footprints, regular track surveys) that delivers comparable detection probability.	DWER requested comment on this application as a direct interest stakeholder. DBCA did not provide a response. On assessment, DWER considers that other controls within the licence will be sufficient to manage the risk associated with feral animals entering the premises.
9	Introduction of Mobile Mixing Tanks. Allowing temporary mobile mixing tanks on the Drying Bed increases the likelihood of accidental releases during transport, set-up, or cleaning, especially on uneven, unpaved surfaces. The amendment does not include a risk-assessment for spill or leak events associated with moving large volumes of hazardous waste on-site, nor does it describe secondary containment (e.g., bunds, drip trays). Recommendation: Require a spill-prevention and emergency-response plan specific to the mobile tanks, including secondary containment design, inspection frequency, and training requirements for operators.	DWER requested further information from the Licence Holder on the MMT on 16 January 2026. The Licence Holder provided the requested information on 19 January 2026. This is provided in Table 6. DWER has allowed the addition of MMT in Condition 9 Table 3 as the Licence Holder controls are suitable to mitigate risk of emissions and existing infrastructure is in place.

Condition	Summary of Public submission	Department's response
N/A	Consistency with Existing Works Approval. The Works Approval for the evaporation ponds and drying bed (W6799/2023/1) stipulated critical containment infrastructure (CCI) reporting and environmental-commissioning conditions (Attachments 8A and 8B). The amendment assumes that the Critical Containment Infrastructure Report (CCIR) submitted in October 2024 remains valid for the extended operation period. DWER's own correspondence (Attachment 8B) confirms that the CCIR met conditions 4 and 5 of the works approval, but the expiry of the TLO (originally 30 April 2025) was extended to 28 October 2025 and now to 26 January 2026. The amendment does not provide a new CCIR reflecting any design modifications, wear-and-tear, or operational changes that may have occurred during the extended period. Recommendation: Require an updated CCIR covering the full extended operation period, including any maintenance, repairs, or upgrades performed on the ponds, drying bed, and associated liners.	W6799 is still valid – it expires 19/11/2028. It authorises construction of three (3) Evaporation Ponds (Stage 1 and 2) and two (2) Drying beds. The works approval holder submitted a CCI for two Evaporation ponds and one drying bed. This means the works approval holder can still construct the outstanding evaporation pond and drying bed prior to the expiry date of 19/11/2028. DWER assessed Construction compliance for the two evaporation ponds and drying bed and found they were compliant with the works approval. If the works approval holder does construct the additional evaporation pond and drying bed, they will need to submit another CCI for those two infrastructure in compliance with the conditions of W6799. If that occurs DWER will assess the CCI.
1, 28 and 39.	Alignment with Legislative and Policy Framework The amendment must satisfy several statutory and policy requirements. The Environmental Protection Act 1986 (EP Act) requires that any amendment demonstrate that the change does not increase risk to the environment (s 54(1)(a) and r 5B(2)(a) of the EP Regulations). The proposed increase in waste throughput, reduction in monitoring, and removal of camera-trap monitoring collectively introduce potential increases in risk that have not been demonstrated. Western Australia's EPA PFAS guidance (2023) calls for specific monitoring where PFAS-containing waste may be accepted. The amendment does not address this. The Western Australia Waste Avoidance and Resource Recovery Strategy (2022) emphasises waste minimisation and recycling. Expanding landfill capacity without accompanying waste-diversion targets conflicts with this policy. Gap Summary: The amendment lacks quantitative evidence that leachate capacity, groundwater protection, and bio-security controls remain adequate after the proposed changes.	The request to increase Category 64 and 65 P&DC was withdrawn by the Licence Holder on 19 January 2026 as discussed above. The removal of feral animal camera trap and a groundwater monitoring requirement that is now redundant does not increase the risk profile relating to emissions from the premises.

Condition	Summary of Public submission	Department's response
N/A	**Requested Conditions / Further Information** 1. Leachate-generation and liner-capacity modelling – Submit a hydraulic model that quantifies leachate volume at the proposed 80 000 t pa throughput, demonstrates that the liner and collection system can accommodate the load, and provides design parameters for any required upgrades. 2. Baseline PFAS monitoring – Conduct initial sampling of groundwater and leachate for PFAS compounds, following EPA guidelines, and outline a monitoring programme for the life of the licence. 3. Re-instatement of continuous groundwater-level monitoring – Either reinstall robust continuous loggers or implement quarterly automated measurements, together with a maintenance and replacement schedule. 4. Retention of camera-trap monitoring – Keep the camera-trap requirement, or supply an alternative monitoring protocol that achieves an equivalent detection probability for feral-animal activity. 5. Spill-prevention plan for mobile mixing tanks – Provide a detailed plan that includes secondary containment, inspection procedures, emergency shut-down steps, and operator training. 6. Updated Critical Containment Infrastructure Report – Submit a new CCIR that covers the entire extended TLO period and documents any modifications, repairs, or inspections performed on the ponds and drying bed. 7. Quantitative waste-diversion targets – Outline measurable goals for recycling or recovery of incoming waste (e.g., percentage of waste diverted from landfill) consistent with the Western Australia Waste Avoidance and Resource Recovery Strategy. 8. Independent third-party audit – Arrange for an external audit of the revised waste-acceptance schedule, focusing on hazardous-waste handling, PFAS, and heavy-metal inventories, and provide the audit report to DWER.	1. The licence holder has withdrawn the amendment to increase category 64 and 65 P&DC. DWER advised the licence holder on 16/01/2206 that this amendment will require a detailed risk assessment be submitted and included a list of requirements. DWER will conduct a detailed risk assessment when a separate application is submitted. 2. As above. 3. Standing Water Level is monitored monthly as per condition 39 Table 7. 4. As above. 5. As above – DWER requested further information on the MMT. The Licence Holder submitted this as requested. 6. As above – not required at this point. 7. Not subject to licence conditions. 8. Not subject to licence conditions- the licence holder is free to engage independent third parties to improve waste management at the facility.
-	**Conclusion** While the Shire of Ashburton has supplied extensive documentation supporting the amendment, the proposed increases in waste throughput, reductions in environmental monitoring, and removal of certain bio-security controls raise substantive uncertainties about the continued protection of groundwater, surrounding ecosystems, and community health. In line with the Environmental Protection Act 1986 and DWER's precautionary-principle policy, the amendment should be conditioned on the provision of the additional scientific evidence and safeguards outlined above before approval is granted.	DWER has addressed the comments above. DWER has conducted a risk assessment for this amendment application, and the risk has not increased. An additional amendment application is required for the increase in Category 64 and 65 P&DC – DWER has advised the Licence Holder of this requirement on 16/01/2026. A detailed risk assessment will occur if that application is submitted.

Appendix 2: Summary of Licence Holder's comments on risk assessment and draft conditions

Amendment Report	Summary of Licence Holder's comment	Department's response
1. Decision Summary	Last paragraph – not revenant please delete.	Template wording will remain in Amendment Report.
2.2 Application summary	*The Licence Holder submitted an amendment application with many amendment requests which were additional amendments above the original intent, and upon review DWER, advised the Licence Holder the requested amendments would require more time to assess the application therefore, it was unlikely the amendment would be granted by 26 January 2026. In negotiations with the Licence Holder on 19 January 2026, many amendments have been withdrawn, and these will be subject to a separate amendment application.* The only amendment withdrawn was the proposed increase in P&DC of Category 64 and 65 – delete paragraph	This paragraph was retained in the Amendment Report drafts in error – now deleted.
Table 1	Confirm increase in Category 61 and 61A P&DC to mirror the respective P&DC of Category 61 and 61A from W6799	Noted – change implemented in Amendment Report and Licence
Licence	**Summary of Licence Holder's comment**	**Department's response**
Prescribed Premises category description.	Confirm increase in Category 61 and 61A P&DC to mirror the respective P&DC of Category 61 and 61A from W6799	Noted – change implemented in Licence: • P&DC of Category 61 is now 22,000 tonnes per annual period; and • Category 61A is now 40,000 tonnes per annual period.
Condition 39 Table 7	*Regarding the request to amend Condition 31, Table 7 of the licence to remove the requirement for continuous monitoring of standing water level, we note the department has refused this request as the monitoring requirement relates to the submission of sampling data (outlined in condition 44 of the existing licence) and, therefore, the requirement can't be removed until the obligations within condition 44 have been met.*	DWER notes the Licence Holder provided a summary of the SWL instantaneous data required under proposed condition 52 (previously condition 44) within this Licence amendment application package. DWER will need to assess compliance of the submitted data

Amendment Report	Summary of Licence Holder's comment	Department's response
	Condition 44 required the Shire to submit reports to the department of the instantaneous standing water level sampling: • *Within 30 days following the first six months of logger installation, and* • *Within 30 days following the first 24 months.* *The Shire complied with the initial requirement and submitted the six-month groundwater monitoring report within the required timeframe. However, the second (24-month) reporting submission was not submitted within the required timeframe as the data loggers malfunctioned around the six-month period due to the brackish nature of the ambient groundwater, which led to significant corrosion and degradation of the loggers and batteries, and the 24-month monitoring duration specified in Table 7 ended on 22 December 2023. The non-compliance with the 24-month monitoring requirement was reported and recorded in the 2024 Annual Audit Compliance Report. A report to satisfy the 24-month reporting requirement of Condition 44 was provided with the licence amendment application and a copy is attached. Given the reporting requirements have now been met, and the 24-month monitoring period has ended, the Shire is requesting if the continuous monitoring requirement in Table 7 and condition 44 (now 52 in the draft amended licence) can be removed.*	against the condition requirement. As condition 44 isn't enforceable without the SWL instantaneous monitoring requirement of existing condition 31 in place, this requirement will be retained on the Licence until compliance with condition 44 is assessed and demonstrated. Removal of this requirement and condition 44 can be requested from the Licence Holder through a subsequent amendment application once compliance with existing condition requirements has been demonstrated.