



## Application for Licence

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

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<b>Licence Number</b>	L9377/2023/1
<b>Applicant</b>	Shire of Coolgardie
<b>File number</b>	DER2022/000612
<b>Premises</b>	Coolgardie Waste Facility Coolgardie Tip Road COOLGARDIE WA 6492 Legal description - Crown Reserve 3497 Lot 501 on Deposited Plan 255090 As defined by the map and coordinates in Schedule 1 and 2
<b>Date of report</b>	3 July 2023
<b>Proposed Decision</b>	Intent to grant licence

#### **MANAGER WASTE INDUSTRIES REGULATORY SERVICES**

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

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## 1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, Licence L9377/2023/1 has been granted.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 and overview of premises

On 10 November 2022, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application was to seek a licence relating to the operation of a Class III landfill (Stage 1) (category 64) at the premises recently constructed under Works Approval W6534/2021/1. The premises is located approximately 2 km west of Coolgardie.

Following a review of the application, a request for information was issued to the applicant seeking additional details on proposed waste acceptance and handling activities at the premises, including historic waste storage and landfilling areas to the east of the approved Class III landfill cell.

On 31 January 2023, additional information on historical, current, and proposed waste management activities was provided by the applicant; it was confirmed that the following categories would also be applicable to the premises:

- Category 57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.
- Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated, or irrigated.
- Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.
- Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.
- Category 63: Class I inert landfill site: premises (other than a clean fill premises) on which waste of a type permitted for disposal for this category of prescribed premises, in accordance with the *Landfill Waste Classification and Waste Definitions 1996*, is accepted for burial.

The premises relates to the categories and assessed design capacity under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in Licence L9377/2023/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020<sup>b</sup>) is also outlined in Licence L9377/2023/1.

## 2.3 Compliance against Works Approval W6534/2021/1

On 26 October 2022 Talis Consultants submitted a construction quality assurance (CQA) validation report on behalf of the Shire of Coolgardie to satisfy Works Approval W6534/2021/1, conditions 2 through 8 (Talis 2022). An assessment of the submitted documentation was undertaken by DWER and it was determined that additional detail was required to demonstrate compliance with construction and reporting requirements. Additional CQA documentation was received on 20 December 2022, and following further review by DWER it was determined that the infrastructure constructed to date generally met the requirements of conditions 2 through 8 of Works Approval W6534/2021/1. However, additional detail on revised stormwater infrastructure was required due to siting issues identified following cell construction.

Based on the additional information, the Shire of Coolgardie was advised that time-limited operations may then commence in accordance with conditions 11 and 12 of the above works approval. It was also requested that revised stormwater management infrastructure plans be provided in support of the licence application.

## 2.4 Waste acceptance

As outlined in the Landfill Environmental Management Plan (GHD 2021) submitted in support of the licence application, it was proposed that the Class III Landfill is expected to accept the following waste types:

- Clean fill;
- Uncontaminated fill;
- Neutralised acid sulfate soil;
- Putrescible waste, including animal mortalities;
- Contaminated soil waste meeting waste acceptance criteria for Class III landfills; and
- Special Waste Type 1, 2 and 3.

It had initially been proposed that Inert Waste Type 2 (tyres) and Special Waste Type 1 (asbestos) would be accepted into the Class III cell for burial. However, the applicant has subsequently elected to utilise dedicated monocells for these waste types.

The asbestos monocell will be constructed in the centre of the premises, to the east of the Class III landfill. The asbestos monocell has a proposed footprint of approximately 4,100 m<sup>2</sup> and will be built to a depth of 4 m, with 1:2.5 (V:H) side-slopes. The cell will be progressively developed, with excavated soils won from development of the cell used as cover for asbestos materials as they are landfilled. A 0.5 m surface water bund will be constructed around the perimeter to minimise surface water ingress and a minimum 1 m of clean fill will be applied to the final landform as capping material.

The proposed tyre monocell will have an approximate footprint of 2,655 m<sup>2</sup> and will be constructed to a depth of 6.6 m, with side-slopes at 1:2.5 (V:H). A 0.5 m surface water bund will be constructed around the perimeter to minimise surface water ingress and a minimum 1 m of clean fill will be applied to the final landform as capping material. The monocell will facilitate the burial of three layers of tyres two metres deep, separated by a minimum 300 mm of clean soils. The cell will be progressively developed, with excavated soils won from development of the cell used as cover for tyres as they are landfilled. A monocell enables the safe and inert storage of tyres within a cell where any fires or runoff will be contained, while enabling a singular waste stream to be recovered at a future stage should the processing of tyres become viable. Prior to burial, tyres will be stored in a dedicated tyre storage bay surrounded by earthen bunds on three sides and located in the centre of the premises.

In addition to these material types, the applicant also proposed to accept and dispose of the following Controlled Waste types into the Class III landfill:

- B100 – Acidic solutions or acids in solid form;
- D220 – Lead and lead compounds;
- N100 – Containers or drums contaminated with residues of a controlled waste; and
- N160 – Encapsulated, chemically fixed, solidified, or polymerised controlled wastes.

The Landfill Definitions provide:

*“Hazardous wastes are generally unsuitable for landfill disposal and should only be accepted within landfills after appropriate treatment and/or in accordance with specific licence conditions or with specific, written approval from the Chief Executive Officer”.*

Acidic solutions have the potential to damage the integrity of the landfill liner and leachate management systems, resulting in loss of leachate containment. As such, the disposal of acidic solutions or acids in solid form and lead and lead compounds by landfilling onsite will not be approved.

The acceptance of containers or drums contaminated with residues of a controlled waste or encapsulated, chemically fixed, solidified, or polymerised controlled wastes for disposal by landfill is however permitted on the provision that these wastes meet the acceptance criteria for disposal to a Class III landfill.

**Key findings:**

1. The applicant proposes to receive acidic solutions or acids in solid form, lead and lead compounds, containers or drums contaminated with residues of a controlled waste; and encapsulated, chemically fixed, solidified, or polymerised controlled wastes for disposal by burial in the Class III landfill cell.
2. Hazardous materials such as acidic solutions or acids in solid form, and lead and lead compounds are generally unsuitable for disposal by landfilling.
3. Containers or drums contaminated with residues of a controlled waste or encapsulated, chemically fixed, solidified, or polymerised controlled wastes which meet the relevant landfill acceptance criteria for Class III landfills may be accepted for burial.
4. Controlled wastes are assigned ‘codes’ for purposes of tracking and recording under the *Environmental Protection (Controlled Waste) Regulations 2004* and are not used to determine whether waste types are acceptable for disposal at certain landfill facilities. All potentially contaminated waste materials will still need to be characterised in accordance with the *Landfill Waste Classifications and Waste Definitions 1996* (DWER 2019) to ensure they are suitable for acceptance and disposal in the Class III landfill cell(s).

The applicant has also advised that the premises will receive waste oil below the Category 61 liquid waste facility threshold, as well as domestic quantities of packaged solid and liquid hazardous wastes as part of the household hazardous wastes (HHW) program.

### 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<sup>b</sup>).

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 decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

**Table 1: Proposed applicant controls**

Emission	Sources	Potential pathways	Proposed controls
<b>Construction</b>			
Dust	Excavation, construction activities and vehicle movements during construction of the monocells.	Air/windborne pathway causing impacts to health and amenity.	Physical separation to sensitive receptors.
Noise			Vehicles will be restricted to a maximum speed of 15 km per hour (km/hr) in public access areas or 40 km/hr in the Shire's back of house areas. Deployment of water cart and use of sprinklers during construction. Wetting down of tracks, stockpiles and exposed areas as necessary. Short duration/temporary nature of construction activities. Where possible, all works will cease during periods of strong winds.
<b>Operation</b>			
Odour	Acceptance, storage, handling, burial, and decomposition of putrescible waste. Recovered leachate.	Air/windborne pathway causing impacts to amenity.	Immediate burial or placement of cover material over odorous wastes. Not depositing waste in standing water (in the wake of rainfall events). Depositing waste in thin layers to optimise compaction. Minimising disturbance of previously filled areas.

Emission	Sources	Potential pathways	Proposed controls
Dust (excluding asbestos)	<p>Cover material stockpiles.</p> <p>Vehicle movements.</p> <p>Protection layer placement.</p> <p>Acceptance, storage, handling, and burial of waste.</p> <p>Operational management of the premises.</p> <p>Unloading and stockpiling of C&amp;D waste.</p>	Air/windborne pathway causing impacts to health and amenity.	<p>Avoiding groundworks during adverse weather conditions (high winds and dry conditions).</p> <p>A water cart will be mobilised from the Shire depot and utilised on unsealed roads, the active landfill cell and other operations as deemed necessary.</p> <p>Vehicles will be restricted to a maximum speed of 15 km per hour (km/hr) in public access areas or 40 km/hr in the Shire's back of house areas.</p> <p>Ensuring all vehicles accessing the premises utilise designated access roadways wherever possible.</p> <p>Waste will be covered during transport.</p> <p>Wetting-down of active tipping area during working hours.</p> <p>Wetting-down of waste materials with potential to generate dust prior to unloading at the tipping face.</p> <p>Application of inert waste cover material as soon as practicable after tipping and no later than the end of the working day.</p> <p>As far as practicable, the active landfill area will be positioned away from the edge of the active cell.</p> <p>As far as practicable, loads will not be tipped oblique to the wind.</p> <p>Material drop/tip heights will be minimised where possible.</p> <p>Exposed soil surfaces and stockpiles in non-active area will be stabilised (e.g., with chemical surfactants) or temporarily covered (e.g., with mulch) prior to permanent re-vegetation or restoration.</p> <p>Physical separation of premises from sensitive receptors.</p> <p>All works and receipt of waste, where possible, will cease during periods of strong winds.</p>

Emission	Sources	Potential pathways	Proposed controls
Noise	<p>Acceptance, storage, handling, burial, and decomposition of waste – up to Class III including asbestos and biomedical waste.</p> <p>Vehicle movements.</p>	<p>Air/windborne pathway causing impacts to health and amenity.</p>	<p>Separation distance from sensitive receptors.</p> <p>Maintenance of all landfill plant and machinery in proper working order.</p> <p>Ensuring all vehicles accessing the premises utilise designated access roadways.</p> <p>Limiting operation of plant and equipment to specified working hours.</p> <p>If required, plant and equipment shall be fitted with appropriate acoustic treatment (i.e., silencers).</p> <p>Screening berm has been constructed in the southwest corner of the premises. The perimeter screening bund has been constructed but has not been surveyed. The bund is approximately 3 m high, greater than 8 m wide in places, and approximately 730 m long around the southern and western boundaries of the Stage 1 landfill.</p> <p>Vehicles will be restricted to a maximum speed of 15 km/hr in public access areas or 40 km/hr in the Shire's back of house areas.</p> <p>Noise reducing workplace procedures will be adopted such as slow unloading of materials from the lowest height possible.</p> <p>All material handling will be confined to the designated areas.</p>
Windblown waste/litter	<p>Acceptance, storage, handling, and burial of waste.</p>	<p>Air/windborne pathway causing impacts to amenity.</p> <p>Dispersal by scavenging fauna.</p>	<p>Construction of screening berm in southwest corner of premises.</p> <p>Covering all loads entering and transported within the premises.</p> <p>Regular compaction and covering of deposited waste.</p> <p>Establishing and maintaining vegetative litter screens around strategic locations within the premises.</p> <p>Size of tipping face limited to reduce potential for windblown waste.</p> <p>Fencing of premises boundary with cyclone mesh.</p> <p>Retrieval of litter from outside the perimeter. Litter to be collected from surface water storm drains, inlets of pipes and culverts on a regular basis.</p> <p>All works and receipt of waste, where possible, will cease during periods of strong winds.</p>



Emission	Sources	Potential pathways	Proposed controls
Fugitive landfill gas	<p>Acceptance, storage, handling, burial, and decomposition of waste.</p> <p>Leachate methanogenesis under anerobic conditions within evaporation pond.</p> <p>Post-closure vertical migration through capping layer.</p>	<p>Passive venting to air.</p> <p>Lateral migration through soil.</p>	<p>The landfill cell is lined such that it reduces the lateral migration of landfill gas.</p> <p>Use of daily cover material would oxidise some of the methane gas before dispersing in the atmosphere.</p> <p>Regional clay geology surrounds the lining system and some oxidation of methane is expected to occur in the clay lithology.</p>
Landfill leachate	<p>Acceptance, storage, handling, burial and decomposition of waste</p> <p>Collection, storage and management of leachate</p> <p>Operational management of the premises.</p>	<p>Seepage to ground – causing impact to native ecosystem and groundwater quality.</p> <p>Pond overtopping or pipework failure resulting in overland flow with subsequent seepage to ground – causing impact to native ecosystem and groundwater quality.</p>	<p>Stage 1 was excavated to a maximum depth of 8 m below ground level (mBGL) and groundwater underlying the premises is between 25 m to 30 mBGL. Therefore, there is 17 - 22 m of bedrock (cemented duricrust material) between the waste mass and the underlying aquifer.</p> <p>Installation of 600 mm thick compacted clay liner and a 2.0 mm single sided textured HDPE geomembrane as part of cell construction.</p> <p>Installation of a leachate collection system and evaporation pond.</p> <p>Leachate head of the landfill liner will be maintained at a maximum 300 mm.</p> <p>Accumulated leachate in the cell sump will be pumped into the dedicated leachate evaporation pond.</p> <p>Leachate containment infrastructure engineered to accommodate sufficient storage capacity for leachate over a worst-case climatic period (2 consecutive 90% AEP rainfall years).</p> <p>Placement of intermediate cover material over each cell stage is completed.</p> <p>Placement of capping layer at the end of the cell's life will reduce ongoing leachate generation.</p>

Emission	Sources	Potential pathways	Proposed controls
Potentially contaminated and contaminated stormwater	<p>Acceptance, storage, handling, burial and decomposition of waste (i.e. accumulation of rainwater within trenches, tipping areas and depressions)</p> <p>Operational management of the premises (i.e., runoff from exposed waste and cover stockpiles).</p> <p>Runoff from green waste stockpiles during rainfall events.</p>	<p>Basin overtopping and overland flow with subsequent seepage to ground – causing impact to native ecosystem and groundwater quality.</p> <p>Overland flow and seepage to ground – causing impact to native ecosystem and groundwater quality.</p>	<p>A 0.5 m high perimeter bund has been constructed on the crest of the cell, so that stormwater will not run into the landfill cell; around the eastern and western edges of Stage 1. The perimeter bund wall is located upstream of the access track, to reduce the risk that the access track will flood and become unusable. Precast reinforced concrete pipes have been included to convey stormwater from upstream of the bund to the southern and northern swale drains.</p> <p>Surface water management system for the premises incorporating a series of bunds (or contour banks) and swale drains to direct stormwater around the landfill footprint to clay-lined stormwater detention/sedimentation basins located to the north and south of the landfilling areas.</p> <p>Stormwater retention/sedimentation basin and stormwater drainage infrastructure have been designed for "worst case climatic scenarios" to contain surface water on-site.</p> <p>Following the closure of a cell stage, an engineered landfill cap will be constructed on top of the cell; any surface water runoff from the landfill cap will runoff into stormwater drains and to a stormwater holding dam. The cap will be revegetated with native plant species to stabilise the site and reduce erosion from overland stormwater flows.</p> <p>Should the applicant believe weather conditions will hinder effective environmental management of the premises, no further waste will be accepted onsite until weather conditions become more favourable (with respect to environmental management) or alternative environmental management measures are identified and implemented.</p> <p>Earthen bunds for green waste storage and burning.</p>

Emission	Sources	Potential pathways	Proposed controls
Vector emissions – vermin, pests, pathogens	Acceptance, storage, handling, burial and decomposition of waste.	Movement via air or transmission via fauna.	<p>Regular compaction and covering of deposited waste.</p> <p>Fencing of premises boundary with cyclone mesh.</p> <p>Use of traps and/or baits to deter and/or control vermin, as well as engaging professional pest and weed control subcontractors.</p> <p>Grading of premises to prevent surface ponding (and mosquito breeding) following rainfall events.</p>
Smoke, ash and fire embers from scheduled burning of green waste	Burning of dried, stockpiled green waste.	<p>Air/windborne pathway causing impacts to health and amenity.</p> <p>Habitat destruction (fire).</p>	<p>Compliance with green waste burning requirements outlined in the Environmental Protection (Rural Landfill) Regulations 2002.</p> <p>Establishing and maintaining fire breaks between the site boundary and surrounding areas.</p>
Plant pathogens and weed propagules	<p>Air/windborne pathway resulting in dispersal to remnant native vegetation.</p> <p>Dispersal by scavenging animals.</p> <p>Physical transportation offsite and direct application to landscaped or natural areas.</p>	Transportation and direct application to natural and landscaped areas.	<p>No controls proposed for plant pathogens.</p> <p>Vehicles to adhere to established roads and tracks to prevent the spread of weeds within the premises.</p> <p>Establishing and maintaining fire breaks between the premises boundary and surrounding areas.</p> <p>Regular monitoring of weeds across the premises to be undertaken by staff.</p> <p>Regular weed management methods to be undertaken via manual removal and/or by chemical application prior to flowering periods by a suitable Weed Contractor, if required.</p>
Spillage of hazardous wastes	Acceptance, handling, storage and accidental spillage of hazardous wastes.	Seepage to ground – causing impact to native ecosystem and groundwater quality	<p>Higher-risk materials such as paint and oil will be stored in appropriate locations and covered as required to minimise contact with stormwater and leachate generation.</p> <p>Paint will be stored within a dedicated lockable container, which will be covered and bunded, in the east of the premises near the entrance.</p> <p>Waste oil is stored within a double bunded tank within the Waste oil shed near the entrance of the premises.</p> <p>Batteries, including used lead acid batteries, are bunded and stored undercover in a shed.</p>

Emission	Sources	Potential pathways	Proposed controls
Dust – asbestos fibres	Acceptance, handling, and burial of asbestos waste.	Air/windborne pathway causing impacts to health and amenity.	<p>Transport requirements under the Environmental Protection (Controlled Waste) Regulations 2004 requires that asbestos wastes are clearly labelled and wrapped or otherwise contained in a manner that prevents asbestos fibres entering the atmosphere.</p> <p>Inspection of incoming waste to identify any potential asbestos containing material.</p> <p>Adoption of dedicated asbestos acceptance and burial procedures.</p> <p>Shire will prepare an AMP to outline the requirements for the correct acceptance, handling, and disposal of asbestos to ensure that it is managed safely. The AMP will include detail on personal protective equipment, training measures associated with asbestos and will further detail the site-specific risks for asbestos management.</p>
Smoke and ash from uncontrolled landfill fire	<p>Acceptance, storage, handling, burial and decomposition of waste.</p> <p>Accidental ignition, spontaneous combustion or arson.</p>	<p>Air/windborne pathway causing impacts to health and amenity.</p> <p>Habitat destruction (fire).</p>	<p>Fencing of premises boundary with cyclone mesh topped with razor wire and electrification at strategic locations.</p> <p>Installation of CCTV.</p> <p>Establishing and maintaining fire breaks between the site boundary and surrounding areas.</p> <p>Inspection of incoming waste to identify any likely ignition sources (e.g. batteries, flammable chemicals).</p> <p>Parking of plant and machinery away from active landfilling areas.</p> <p>Control of wind-blown litter accumulations along internal premises perimeter.</p> <p>Ensure adequate cover material is used to isolate freshly placed waste from any potential fire.</p> <p>Timely covering of deposited inflammable wastes.</p> <p>Compaction and covering of deposited combustible wastes to eliminate voids.</p> <p>Deployment of a mobile water tanker equipped with firefighting pump and apparatus on site during active landfilling operations.</p>

Emission	Sources	Potential pathways	Proposed controls
Smoke from tyre fire	Acceptance and storage of used tyres.	Air/windborne pathway causing impacts to health and amenity.	Segregation of used tyres in a dedicated tyre storage bay. Establishing and maintaining fire breaks between the site boundary and surrounding areas. Burial and coverage of filled tyres within dedicated tyre monocell.
Fire debris and washwaters from tyre fire		Seepage to ground – causing impact to native ecosystem and groundwater quality	Tyres will be stored in a flat area surrounded by earthen bunds on three sides to contain the tyres and limit dispersion of runoff.

### 3.1.2 Receptors

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

Table 2 and Figure 1 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<sup>a</sup>)).

**Table 2: Sensitive receptors and distance from prescribed activity**

Receptor ID	Receptor	Distance from prescribed activity
<b>Human receptors</b>		
H1	Residential property (Coolgardie Camel Farm)	Approximately 420 m south-south-west of premises boundary.
H2	Rural residential properties	Approximately 800 m to the south of the premises (South of Great Eastern Highway) and the Goldfields Water Supply Scheme pipeline corridor.
H3	Coolgardie Cemetery	Approximately 1 km east of premises boundary.
H4	Coolgardie Golf Club	Approximately 1.1 km southeast of premises boundary.
H5	Coolgardie Township (Lindsay Street)	Approximately 2.4 km west of premises boundary.
<b>Environmental receptors</b>		
E1	Remnant native vegetation	Immediately adjacent to premises boundary.



Receptor ID	Receptor	Distance from prescribed activity
E2	Minor non-perennial unnamed creek	Approximately 200 m south of premises boundary. Creek drains west – northwest, discharging into a Salt Lake approximately 14 km northwest of the premises.
E3	Recorded threatened and priority flora	No specimens recorded within a 2 km buffer of the premises boundary.
E4	Underlying groundwater (non-potable purposes) Designated groundwater area – Goldfields.	Approximate depth to groundwater is 25 – 30 mBGL based on findings of the factual geotechnical report. The landfill cells will be excavated to a maximum depth of 8 mBGL and will be in the vicinity of 17 - 22 m of bedrock (cemented duricrust material) between the waste mass and the underlying aquifer.
E5	DBCA legislated tenure – Kangaroo Hills timber reserve	Approximately 6.7 km southwest of premises boundary.



**Figure 1: Distance to sensitive receptors (premises boundary demarcated in pink)**

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020<sup>b</sup>) for each identified emission source 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 applicant 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 applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L9377/2023/1 that accompanies this decision report authorises emissions associated with the operation of the premises i.e., acceptance, and storage of liquid and solid wastes, and the burial of up to Class III waste; including asbestos, tyres and biomedical waste.

The conditions in the issued licence, as outlined in Table 3 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

**Table 3: Risk assessment of potential emissions and discharges from the premises during operation**

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	General comments and/or justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
<b>Construction of stormwater infrastructure, and asbestos and tyre monocells</b>								
Excavation activities Vehicle movements	Dust	Air/windborne pathway causing impacts to health and amenity.	Residential and Rural residential properties	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	Conditions 6, 7, 8	Applicant controls are acceptable to manage the associated risk.
	Noise	Air/windborne pathway causing impacts to health and amenity.	Residential and Rural residential properties	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	N/A	Applicant controls are acceptable to manage the associated risk.
<b>Operation</b>								
Cover material stockpiles	Fugitive dust (excluding asbestos fibres)	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 6, 7, 8	Applicant controls are acceptable to manage the associated risk.
	Sediment laden stormwater	Overland flow and seepage to ground – causing impact to surrounding native ecosystems and groundwater quality	Remnant native vegetation surrounding the premises.  Minor non-perennial unnamed creek.	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	Conditions 1, 21	Applicant controls are acceptable to manage the associated risk.  Under the Environmental Protection (Unauthorised Discharges) Regulations 2004, it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. Materials that must not be discharged into the environment include, but are not limited to, sediment (i.e. visible suspended solids in water).
Vehicle movements	Fugitive dust (excluding asbestos fibres)	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 6, 7, 8	Applicant controls are acceptable to manage the associated risk.
			Coolgardie cemetery and golf club.		C = Minor L = Rare <b>Low Risk</b>			
	Noise	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	N/A	The applicant must adhere to the Environmental Protection (Noise) Regulations 1997.
			Coolgardie cemetery and golf club.		C = Slight L = Unlikely <b>Low Risk</b>			
Acceptance, storage, sorting, burial and decomposition of waste – up to Class III including asbestos and biomedical waste.  Operational management of the premises.	Fugitive dust (excluding asbestos fibres)	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Minor L = Possible <b>Medium Risk</b>	Y	Conditions 6, 7, 8	Applicant controls are acceptable to manage the associated risk.
			Coolgardie cemetery and golf club.		C = Slight L = Unlikely <b>Low Risk</b>			



Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	General comments and/or justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Acceptance, storage, sorting, burial and decomposition of waste – up to Class III including asbestos and biomedical waste.  Operational management of the premises.  (cont.)	Dust - asbestos fibres	Air/windborne pathway causing chronic health impacts.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Major L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 3, 5, 6, 7, 8	Applicant controls are acceptable to manage the associated risk.  Requirements of the Environmental Protection (Controlled Waste) Regulations 2004 outline requirements for the transport of asbestos on public roads which require that asbestos wastes are separated from other wastes, that asbestos wastes are clearly labelled and that wastes are wrapped or otherwise contained in a manner that prevents asbestos fibres entering the atmosphere.
			Coolgardie cemetery and golf club.		C = Major L = Unlikely Medium Risk			
			Coolgardie township.		C = Major L = Unlikely Medium Risk			
	Noise	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	N/A	The applicant must adhere to the Environmental Protection (Noise) Regulations 1997.
	Odour	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 5	Applicant controls are acceptable to manage the associated risk.
			Coolgardie cemetery and golf club.		C = Minor L = Possible <b>Medium Risk</b>			
			Coolgardie township.		C = Minor L = Possible <b>Medium Risk</b>			
	Sediment laden stormwater	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality	Remnant native vegetation.	Refer to Section 3.1	C = Slight L = Rare <b>Low Risk</b>	Y	Conditions 1, 21	Applicant controls are acceptable to manage the associated risk.  Under the Environmental Protection (Unauthorised Discharges) Regulations 2004, it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. Materials that must not be discharged into the environment include, but are not limited to, sediment (i.e. visible suspended solids in water).
			Minor non-perennial unnamed creek.		C = Slight L = Rare Low Risk			
	Landfill leachate	Overtopping or leakage, overland flow, and seepage to ground – causing impact to native ecosystem and groundwater quality.	Minor non-perennial unnamed creek.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 12, 13, 21	Applicant controls are acceptable to manage the associated risk.
			Remnant native vegetation.		C = Moderate L = Unlikely <b>Medium Risk</b>			
		Seepage to ground – causing impact to native ecosystem and groundwater quality.	Underlying groundwater (non-potable purposes).		C = Minor L = Unlikely <b>Medium Risk</b>			

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	General comments and/or justification for additional regulatory controls	
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood				
Acceptance, storage, sorting, burial and decomposition of waste – up to Class III including asbestos and biomedical waste.  Operational management of the premises. (cont.)	Potentially contaminated stormwater	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality.	Minor non-perennial unnamed creek.	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 21	Applicant controls are acceptable to manage the associated risk.  Under the Environmental Protection (Unauthorised Discharges) Regulations 2004, it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. Materials that must not be discharged into the environment include, but are not limited to, acid, alkali, metal compounds, paints, degreaser, detergents, food waste, mineral oils, sediments (i.e. visible suspended solids in water).	
			Remnant native vegetation.		C = Moderate L = Unlikely <b>Medium Risk</b>				
			Underlying groundwater (non-potable purposes).		C = Moderate L = Unlikely <b>Medium Risk</b>				
	Fugitive landfill gas	Passive venting to air Lateral migration through soil	Remnant native vegetation.	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	Y	N/A		Applicant controls are acceptable to manage the associated risk for Stage 1.  As landfill stages progress, the City should consider active capture, collection and treatment of landfill gas. The Landfill Environmental Management Plan (GHD 2021), notes that the need for a gas collection system for the future landfill stages will require further assessment. The departments expectation is that further consideration is given to this environmental aspect as part of planning for Stage 2 of the landfill and beyond.
	Vector emissions – vermin, pests, pathogens	Movement via air, or transmission via fauna	Residential and rural residential properties: H1 and H2. Coolgardie cemetery and golf club. Coolgardie township.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Condition 9		Applicant controls are acceptable to manage the associated risk.
	Windblown waste/litter	Air/windborne pathway causing impacts to amenity. Dispersal by scavenging fauna.	Residential and rural residential properties: H1 and H2. Remnant native vegetation.	Refer to Section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	Condition 9		Applicant controls are acceptable to manage the associated risk.
Fire incident: smoke, fumes and ash.	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2. Coolgardie cemetery and golf club. Coolgardie township.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 5, 10, 21	Applicant controls are acceptable to manage the associated risk.		
Fire incident: Fire debris and washwaters	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality	Minor non-perennial unnamed creek. Remnant native vegetation. Underlying groundwater (non-potable purposes).	Refer to Section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	Conditions 1, 2, 4, 10, 21	Applicant controls are acceptable to manage the associated risk.		

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	General comments and/or justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Acceptance, storage, sorting, burial and decomposition of waste – up to Class III including asbestos and biomedical waste.  Operational management of the premises.  (cont.)	Fire incident: embers (bushfire ignition)	Potential property and habitat destruction.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Major L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 10, 21	Applicant controls are acceptable to manage the associated risk.
			Remnant native vegetation. Recorded threatened and priority flora. Kangaroo Hills timber reserve.		C = Major L = Unlikely <b>Medium Risk</b>			
Collection, storage, and management of landfill leachate	Landfill leachate	Overtopping or leakage from ponds and conveyance infrastructure resulting in overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality.	Minor non-perennial unnamed creek. Remnant native vegetation. Underlying groundwater (non-potable purposes).	Refer to Section 3.1	C = Moderate L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 4, 12, 13, 21	Applicant controls are acceptable to manage the associated risk.
	Odour	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2. Coolgardie cemetery and golf club. Coolgardie township.	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	N/A	Applicant controls are acceptable to manage the associated risk.
Acceptance and burial of asbestos waste	Dust – asbestos fibres	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Major L = Unlikely <b>Medium Risk</b>	Y	Conditions 1, 2, 3, 5, 6, 7, 8	Applicant controls are acceptable to manage the associated risk
Acceptance and storage of liquid waste (paints, hydrocarbons)	Potentially contaminated stormwater	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality.	Minor non-perennial unnamed creek. Groundwater users (current and potential future users). Potential native habitat in surrounding properties.	Refer to Section 3.1	C = Minor L = Possible <b>Medium risk</b>	Y	Conditions 1, 2, 3, 4	Applicant controls are acceptable to manage the associated risk.  Under the Environmental Protection (Unauthorised Discharges) Regulations 2004, it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. Materials that must not be discharged into the environment include, but are not limited to, acid, alkali, metal compounds, paints, degreaser, detergents, food waste, mineral oils, sediments (i.e. visible suspended solids in water).
Acceptance, storage, sorting and handling of C&D waste and recyclable wastes via the solid waste depot	Dust	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions 6, 7, 8	Applicant controls are acceptable to manage the associated risk.
	Noise	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Slight L = Possible <b>Low Risk</b>	Y	N/A	The applicant must adhere to the Environmental Protection (Noise) Regulations 1997.
	Potentially contaminated and contaminated stormwater	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality.	Minor non-perennial unnamed creek. Groundwater users (current and potential future users). Potential native habitat in surrounding properties.	Refer to Section 3.1	C = Moderate L = Possible <b>Medium Risk</b>	Y	Conditions 1, 2, 3, 4	Applicant controls are acceptable to manage the associated risk.  Under the Environmental Protection (Unauthorised Discharges) Regulations 2004, it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. Materials that must not be discharged into the environment include, but are not limited to, acid, alkali, metal compounds, paints, degreaser, detergents, food waste, mineral oils, sediments (i.e. visible suspended solids in water).

Risk events					Risk rating <sup>1</sup>	Applicant controls sufficient?	Conditions <sup>2</sup> of licence	General comments and/or justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls	C = consequence L = likelihood			
Acceptance, storage, and burial of used tyres in dedicated monocell	Fire incident: fire debris and washwaters	Overland flow and seepage to ground – causing impact to surrounding native ecosystem and groundwater quality.	Minor non-perennial unnamed creek. Groundwater users (current and potential future users). Potential native habitat in surrounding properties.	Refer to Section 3.1	C = Minor L = Unlikely <b>Medium Risk</b>	N	Conditions 1, 2, 3, 4, 10, 21	Tyre storage requirements included in licence in accordance with Department of Fire and Emergency Services <i>Guidance Note GN02 - Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres.</i>
	Fire incident: smoke, fumes, and ash	Air/windborne pathway causing impacts to health and amenity. Habitat destruction.	Residential and rural residential properties: H1 and H2. Native vegetation in adjacent properties.	Refer to Section 3.1	C = Major L = Unlikely <b>Medium Risk</b>	N		
Green waste storage curing, and burning	Smoke and ash from scheduled green waste burning	Air/windborne pathway causing impacts to health and amenity.	Residential and rural residential properties: H1 and H2.	Refer to Section 3.1	C = Slight L = Unlikely <b>Low Risk</b>	Y	Conditions 1, 4, 10	Specific requirements for the destruction of greenwaste by burning in accordance with the Environmental Protection (Rural Landfill) Regulations 2002 have been included as a condition of the licence.
	Fire incident: embers (bushfire ignition)	Potential property and habitat destruction.	Residential and rural residential properties: H1 and H2. Remnant native vegetation. Recorded threatened and priority flora. Kangaroo Hills timber reserve.	Refer to Section 3.1	C = Major L = Possible <b>High Risk</b>	Y	Conditions 1, 4, 10	
	Pathogens and plant propagules	Air/windborne pathway resulting in dispersal to remnant native vegetation. Dispersal by animal Physical transportation offsite and direct application to landscaped or natural areas	Remnant native vegetation on adjacent properties. Offsite vegetation. Landscaped area.	Refer to Section 3.1	C = Moderate L = Likely <b>High Risk</b>			

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

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

## 3.3 Detailed risk assessment for green waste processing

### 3.3.1 Plant pathogens and weed propagules

In December 2022 the department published the *Guideline: Better practice organics recycling* (the guideline) (DWER 2022). The guideline sets environmental performance objectives (EPO) and identifies benchmark controls for the planning, design and operation of organics recycling facilities. The guideline also defines better practice for organics recycling facilities in relation to the *Waste Avoidance and Resource Recovery Strategy 2030* (Waste Authority 2019).

The guideline applies to all existing organics recycling facilities that are prescribed premises and new applications for a works approval or licence for organics recycling facilities under Part V Division 3 of the EP Act. Organics recycling facilities may be regulated as a Category 61A: Solid waste facility or Category 67A: Compost manufacturing and soil blending prescribed premises under Schedule 1 of the *Environmental Protection Regulations 1987*.

The premises has historically received green waste which was stockpiled, dried, and burnt in purpose-built earthen bays in accordance with the Environmental Protection (Regional Landfill) Regulations 2002. The applicant is seeking to continue the burning of green waste and include provisions for the sporadic processing of green waste; this is proposed to occur in the existing bays. The intention was to produce a mulch product for use in offsite projects, such as the recent use of mulch at the Shire's new worker accommodation village and as part of rehabilitation works within the premises boundary.

The applicant has acknowledged the existence of the guideline, but suggests that:

*“activities at the site are very low risk, both due to the low-risk nature of the feedstock and the low overall volumes that will be processed. The site itself is not located near sensitive receptors, and the significant depth to groundwater and low annual rainfall further contribute to the low risk profile of the mulching activity.”*

The distribution of unpasteurised mulch has the potential to result in the spread of pathogens and weed propagules. Several weed tree species, including weeds of national significance occur within the Shire of Coolgardie. Species with the potential to spread via the distribution of unpasteurized green waste derived mulch include pepper tree (*Schinus molle*), Athel pine (*Tamarix spp.*) and African boxthorn (*Lycium ferocissimum*).

Section 8.10 of the guidelines addresses product quality, with the environmental performance objective “*Contaminants in feedstocks are treated effectively and recycled organic products are fit-for-purpose*”. Operators of organics recycling facilities are responsible for ensuring all products are fit-for-purpose for the proposed end use. A fit-for-purpose product provides beneficial qualities to the receiving environment when used and does not contain contaminants at a level that could cause pollution or environmental harm.

Table 8 of the guideline specifies the feedstock or process requirements for Category A products, including raw mulch. Category A products from an organics recycling facility must comply with the minimum requirements set out in AS 4454 and, if relevant, the unrestricted-use requirements in the biosolids guidelines. The guideline requires that raw mulches are produced using a single known plant material type that embodies minimal risk of plant propagules, pathogens, and other contaminants, with management measures implemented to prevent raw mulches from being cross-contaminated by moderate-risk, high-risk or non-standard feedstocks. Category A products also need to meet the upper contaminant limits in Table 9 of the guideline.

As the applicant proposed to shred mixed garden organic wastes with no subsequent pasteurisation process, the proposed mulching activities do not meet the EPO of the guidelines and this activity is not approved under the licence. Historic green wastes storage and burning activities have been risk assessed and have been approved under the licence subject to fire



management conditions.

### **Key findings**

5. The applicant proposes to generate unpasteurised mulch derived from garden organic wastes from various sources brought to the premises by the public and commercial contractors.
6. Unpasteurised mulch has the potential to result in the spreading of pathogens and weed propagules.
7. No visual inspection, segregation or separation of green waste streams has been proposed.
8. No containment infrastructure to mitigate potential leachate emissions associated with mulch processing have been proposed.
9. No details on proposed processing equipment have been provided by the applicant.
10. The shredded green waste is not proposed to be pasteurised before removal from the premises.
11. Based on the information provided, the proposed mulching activities do not meet the environmental performance objectives of the *Guideline: Better practice organics recycling* and may present a risk of plant propagules, pathogens and other contaminants being spread in mulch products.
12. The applicant should reconsider the proposed approach to producing a fit-for-purpose mulch, ensuring that potential off-site impacts are minimised. Further guidance is available in the *Guideline: Better practice organics recycling* (DWER 2022).

## **4. Consultation**

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

<b>Consultation method</b>	<b>Comments received</b>	<b>Department response</b>
Application advertised on the department's website on 12/04/2023.	No comments received.	Not applicable.
Department of Planning, Lands and Heritage advised of proposal on 12/04/2023.	<i>"Reserve 3497 for the purpose of "Sanitary and Rubbish Disposal Site" is managed by Shire of Coolgardie and has power to lease for periods up to 21 years subject to the minister's consent. As the Reserve purpose allows for waste disposal the department has no objections to the request for waste disposal licence by the Shire of Coolgardie"</i>	Noted.
Applicant was provided with draft documents on 19/05/2023.  A formal response was received on 16/06/2023.	Refer to Appendix 1.	Refer to Appendix 1.

## 5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2019, *Landfill Waste Classifications and Waste Definitions 1996 (as amended 2019)*, Perth, Western Australia.
3. DWER 2020<sup>a</sup>, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020<sup>b</sup>, *Guideline: Risk Assessments*, Perth, Western Australia.
5. DWER 2022, *Guideline: Better practice organics recycling*, Perth, Western Australia.
6. GHD 2021, *Landfill Environmental Management Plan*, unpublished report.
7. Talis Consultants, 25 October 2022, *CQA Validation Report – Cell 1 and Leachate Pond Development - Coolgardie Waste Facility*, unpublished report.
8. Waste Authority 2019, *Waste Avoidance and Resource Recovery Strategy 2030*, Perth, Western Australia.

## Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Schedule 1 – Figures	Provision of new/revised figures for the Premises Layout in Figure 1 (ref: 'TW23020 C-101' (Talis)), Landfill Staging Plan in Figure 7 (ref: '12532983-C004' (GHD)), and Environmental Monitoring Locations in Figure 8 (ref: TW23020 C-103' (Talis)).	Figures revised.
Condition 2, Table 2.	Proposed amendment to waste acceptance for waste oil, clean fill, uncontaminated fill, inert waste type 1 and inert waste type 2.	Noted. Conditions amended to facilitate requested change to conditions.
Condition 4, Table 3.	Provision of information for greenwaste burning and ash management.	Noted. Condition amended accordingly.
	Proposed amendment to mattress storage capacity (permitted maximum increase from 100 to 200 and ability to landfill mattresses onsite if necessary).	Noted. Condition wording amended to include stack dimension specifications and separation requirements to mitigate potential fire risk.
	Approved Inert waste type 2 (used tyres and conveyor belt rubber) to be amended to also facilitate disposal of waste by landfilling.	Noted. Condition wording amended.
Condition 21, Table 8	The Shire would like to confirm that construction of the surface water infrastructure is still anticipated to occur in September/October 2023, with the Environmental Compliance Report (ECR) report to follow a month later.	Noted. Updated timeframes noted and related licence condition specifications modified to reflect. Refer to Condition 21 (Table 8, Item 2).
	Confirmation of construction specification requirements for infrastructure, including the surface water management infrastructure.	Noted, construction requirements amended accordingly – refer to Condition 21 (Table 8, Item 2).  New figures inserted (Figures 3 and 4).
n/a	Proposed inclusion of a departures clause for the specified infrastructure works (with reference to Condition 21 and Table 8)	Departure clauses were historically used in conditions to provide a level of flexibility to the works approval and/or licence holder to satisfy legislative requirements however, they are no longer used due to their ambiguity and practical use by works approval/licence holders.  Any deviations from specifications within conditions may result in a technical non-compliance however, the department has



Condition	Summary of applicant's comment	Department's response
		<p>discretion when considering whether there have been material changes to the risk profile of the site/project with project modifications.</p> <p>If material deviations from the licence is required, the Shire should apply for an amendment. Beyond that, minor deviations can be accounted for in the compliance reports and subject to assessment by the department.</p>

## Appendix 2: Application validation summary

SECTION 1: APPLICATION SUMMARY						
<b>Application type</b>						
Licence	☒	Relevant works approval number:	W6534/2021/1	None	<input type="checkbox"/>	
		Has the works approval been complied with?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
		Has time limited operations under the works approval demonstrated acceptable operations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
		Date Report received: 26/10/2022 DWERDT677350				
Date application received		10/11/2022 DWERDT685362				
<b>Applicant and Premises details</b>						
Applicant name/s (full legal name/s)		Shire of Coolgardie				
Premises name		Coolgardie Waste Facility				
Premises location		Crown reserve 3497 Lot 501 on Deposited Plan 255090 Volume/Folio: 3025/858 Coolgardie Tip Road COOLGARDIE WA 6492				
Local Government Authority		Shire of Coolgardie				
<b>Application documents</b>						
HPCM file reference number:		DER2018/001042-8-44				
Key application documents (additional to application form):		<i>New application form</i> <i>Att 1 – Coolgardie groundwater baseline report</i> <i>Att 2 – Coolgardie Cell 1 and CCIR</i> <i>Att 3 – Coolgardie licence application category checklist</i> <i>Att 4 -proposed fee calculation</i> <i>Att 5 – Landfill environmental management plan</i> <i>Att 6 – Coolgardie landfill stage 1 design report</i> <i>Att 7 – development approval application</i>  <i>Post-RFI</i> <i>Environmental Assessment and Management Plan - Coolgardie Waste Facility</i>				
<b>Scope of application/assessment</b>						
Summary of proposed activities or changes to existing operations.		<b>Licence</b> Operation of: <ul style="list-style-type: none"> <li>• tyre storage facility</li> <li>• liquid waste facility</li> <li>• Solid waste facility</li> <li>• Solid waste depot</li> <li>• Class I inert landfill</li> <li>• Class III putrescible landfill</li> </ul>				

**Category number/s (activities that cause the premises to become prescribed premises)**

**Table 1: Prescribed premises categories**

Prescribed premises category and description	Assessed production or design capacity
Category 57: Used Tyre Storage (general): premises (other than premises within category 56) on which used tyres are stored	5,000 tyres per annual period.
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated, or irrigated.	2,000 tonnes per annual period.
Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	2,000 tonnes per annual period
Category 62: Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use.	5,000 tonnes per annual period.
Category 63: Class I inert landfill site: premises (other than a clean fill premises) on which waste of a type permitted for disposal for this category of prescribed premises, in accordance with the Landfill Waste Classification and Waste Definitions 1996, is accepted for burial.	4,000 tonnes per annual period.
Category 64: Class II or III putrescible landfill site: premises (other than clean fill premises) on which waste of a type permitted for disposal for this category of prescribed premises, in accordance with the Landfill Waste Classification and Waste Definitions 1996, is accepted for burial.	30,000 tonnes per year

**Legislative context and other approvals**

Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input checked="" type="checkbox"/> Assessed under Part IV <input type="checkbox"/>	
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:	
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No:	
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input checked="" type="checkbox"/> General lease <input type="checkbox"/> Expiry: Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:	
Has the applicant obtained all relevant planning approvals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date: If N/A explain why?	
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	CPS No: 53867	

Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Licence/permit No: 53867	
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Licence / permit not required.	
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Type: Proclaimed Groundwater Area/Surface Water Area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Regional office: Swan Avon / Mid-West Gascoyne / Kwinana Peel / North West / South West / Goldfields / South Coast	
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: P1 / P2 / P3 / N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to <a href="#">WQPN 25</a> )? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i> )	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes – Rural landfill regulations under Registration R1550	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Incomplete Report Classification: Incomplete Date of classification: N/A	