



Application for Licence Amendment

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

Licence Number	L9448/2024/1
Licence Holder	Tyrecycle Pty Ltd
ACN	085 545 053
File Number	APP-0029767
Premises	Tyrecycle Rockingham 371 Mandurah Road EAST ROCKINGHAM WA 6168 Legal description - Part of Lot 850 on Deposited Plan 415740
Date of Report	24 June 2025
Decision	Revised licence granted

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

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1. Decision summary

Licence L9448/2024/1 is held by Tyrecycle Pty Ltd (Licence Holder) for the Tyrecycle Rockingham (the Premises), located at 371 Mandurah Road, East Rockingham.

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 L9448/2024/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Application summary

On 4 July 2025, the Licence Holder submitted an application to the department to amend Licence L9448/2024/1 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The amendment seeks approval to store conveyor belts on reels within the existing eastern tyre storage bunkers, up to a maximum height of 3.8 metres, prior to processing. The current Licence (L9448/2024/1) authorises the acceptance and storage of both reeled and unreeled conveyor belts in the tyre storage bunkers; however, it limits the storage height to 2.7 metres. The Licence Holder proposes to store four conveyor belts on reels within two eastern bunkers, maintaining a minimum spacing of 2.5 metres between each reel to support fire risk mitigation.

This amendment is limited only to changes to Category 61A activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Category 57 have been requested by the Licence Holder.

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

Table 1: Proposed changes

Category	Current throughput capacity	Proposed design throughput capacity	Description of proposed amendment
57	23,529 tyres at any one time	None proposed.	None proposed.
61A	42,104 tonnes per annum	None proposed.	The licence holder has requested to store conveyor belts on reels, to a maximum height of 3.8 metres, within the existing tyre storage bunkers prior to processing.

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 and storage of conveyer belts on reels to a maximum height of 3.8 m prior to processing	Air/windborne pathway	There is no change to the approved throughput. Accept and store the conveyor belt on reels within the existing storage bunkers. A maximum of four individual conveyor belt reels will be stored within a single bunker, with no more than eight reels stored in total at any one time.
Noise		Air/windborne pathway	
Fire/smoke		Air/windborne pathway	There is no change to the approved throughput. A maximum of four individual conveyor belt reels will be stored within a single bunker, spaced at least 2.5 m apart. The next set of four reels must be stored in the opposite bunker, ensuring a minimum separation distance of over 18 m between the two bunkers. Divider wall between the western bunkers is over 4.5 m in height and reels would be 6 m away. Conveyor belt reels do not pose a risk of rolling away or creating additional fire hazards.
Firewater		Seepage to soil and groundwater	No changes have been made to the original firewater and contaminated stormwater controls, such as; <ul style="list-style-type: none"> All firewater and stormwater will be retained within the premises boundary by the use of barrier kerbing along all external fence lines. All firewater and stormwater will be filtered by an Atlan Spillceptor underground filtration system prior to discharge utilizing the upgraded stormwater system. The Spillceptor will be treated all flows and is sized to contain more than the anticipated maximum oil spillage and is fully operational in treating stormwater runoff at all times.
Contaminated stormwater		Seepage to soil and groundwater	

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> Filtered water from the Spillceptor is discharged into the stormwater retention basin located adjacent to the premises, within Lot 850 on Deposited Plan 415740 and Lot 804 on Deposited Plan 70633.

3.1.2 Receptors

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

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

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

Human receptors	Distance from prescribed activity
Residential Premises	1.8 km south of the Premises
Industrial premises	Premises located within the general industrial area
Environmental receptors	Distance from prescribed activity
Threatened and Priority ecological communities	<p>Priority 3 -Tuart (<i>Eucalyptus gomphocephala</i>) woodlands and forests of the Swan Coastal Plain – approximately 50 m west of the premises boundary</p> <p>Woodlands over Sedgeland in Holocene dune swales of the southern Swan Coastal Plain – approximately 630 m southwest of the premises boundary</p>
Threatened and priority fauna	<p>There are six threatened and priority fauna within 1 km of the premises boundary, including</p> <ul style="list-style-type: none"> One occurrence of Carnaby's cockatoo an endangered bird species; One occurrence of Peregrine falcon a specially protected bird species; and <p>10 occurrences of Quenda, southwestern brown bandicoot a Priority 4 mammal species.</p>
Geomorphic wetland	<p>Sumpland – approximately 250 m east of the premises boundary</p> <p>Sumpland – approximately 680 m southwest of the premises boundary</p>
Right In Water Irrigation Act Groundwater area	Premises located within Cockburn Groundwater Area
DBCA Managed lands	<p>Conservation and recreation reserve 450 m south east.</p> <p>Leda Nature Reserve 1.3 km south east.</p>

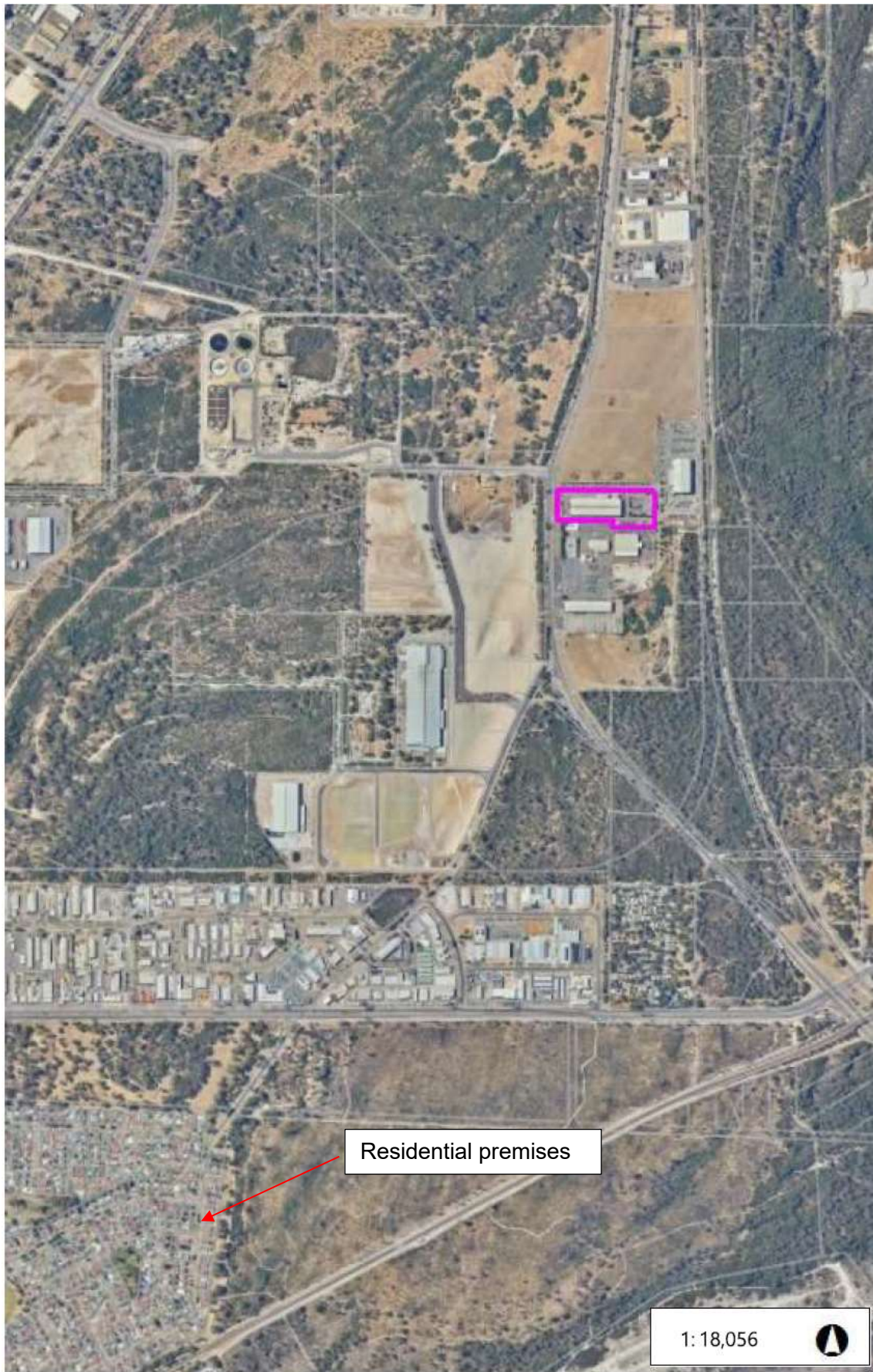


Figure 1: Distance to sensitive receptors

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the Licence Holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the Delegated Officer considers the Licence Holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into 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 L9448/2024/1 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
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Acceptance and storage of conveyer belts on reels to a maximum height of 3.8 m prior to processing	Dust	Air/windborne pathway causing impacts to health and amenity	Residential premises ~1.8 south of the premises	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Conditions 1, 2, 3 and 15	The Delegated Officer has determined that the proposed amendment does not require an increase in annual throughput nor an upgrade to any infrastructure within the premises. Furthermore, the Delegated Officer considers that the Applicant's proposed management controls, existing licence conditions, and current infrastructure are likely sufficient to mitigate dust and noise emissions.
	Noise		Adjacent industrial offices and workplaces	Refer to Section 3.1	C = Slight L = Rare Low Risk	Y	Conditions 1, 2, 3 and 15	
	Fire/ smoke	Air/windborne pathway causing impacts to health and amenity	Residential premises ~1.8 south of the premises Adjacent industrial offices and workplaces Threatened and Priority ecological communities Threatened and priority fauna DBCA Managed lands	Refer to Section 3.1	C = Severe L = Unlikely High Risk	Y	Conditions 1, 2, 3, 4, 5, 14 and 15	

Risk Event					Risk rating ¹ C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	Firewater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Priority ecological communities DBCA Managed lands Geomorphic wetland	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1, 4, 5, 9, 10, 13 and 15	The Delegated Officer considers that the Applicant's proposed management controls, existing licence conditions, and current infrastructure are likely sufficient to mitigate the risk of firewater and contaminated stormwater.
	Contaminate stormwater	Subsurface seepage Causing impacts to groundwater sources	<i>Rights in Water and Irrigation Act 1914</i> Groundwater area	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 1, 6, 7, 8, 9, 10, 13 and 15	

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

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

4. Consultation

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

Table 5: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 17 June 2025	On 23 July 2025, the licence holder confirmed that they are satisfied with the proposed amendment to the licence and wish to proceed with finalising the application.	Noted.

5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

5.1 Summary of amendments

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

Table 6: Summary of licence amendments

Condition no.	Proposed amendments
Cover page	Added Environment Online reference number and date of amendment
Licence history	Updated the licence history table
Condition 1, Table 1	Amended operation requirement for the tyre storage bunkers.
Condition 3, Table 3	Added waste storage and processing specifications for conveyor belt on reel.
Schedule1, Figure 2	Replaced with an updated premises layout map

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.