



Licence

Environmental Protection Act 1986, Part V

Licensee: Alkina Holdings Pty Ltd

Licence: L8946/2016/1

Registered office: Level 1, 10 Kings Park Road
WEST PERTH WA 6005

ACN: 124 202 491

Premises address: Alkina Holdings
Lease Area 11 and 15
190 Flynn Drive
NEERABUP WA 6031
Being Lot 5 on Diagram 91435 as depicted in Schedule 1

| GPS Point | Easting | Northing |
|-----------|-----------|------------|
| 1 | 48283.556 | 293396.480 |
| 2 | 48283.556 | 293254.470 |
| 3 | 48872.856 | 293398.480 |
| 4 | 48132.856 | 293254.970 |

Issue date: Friday, 1 April 2016

Commencement date: Monday, 4 April 2016

Expiry date: Friday, 3 April 2020

Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

| Category number | Category description | Category production or design capacity | Approved Premises production or design capacity |
|-----------------|---|--|---|
| 13 | Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned. | 1,000 tonnes or more per year | 50,000 tonnes per annual period |
| 62 | Solid waste depot: premises on which waste is stored, or sorted, pending final disposal or re-use. | 500 tonnes or more per year | 150,000 tonnes per annual period |



Conditions

This Licence is subject to the conditions set out in the attached pages.

Date signed: 1 April 2016

.....

Alan Kietzmann

Manager Licensing (Waste Industries)

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



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

Alkina Holdings Pty Ltd has applied to DER for a Category 13 and Category 62 licence for the operation of a waste crushing and recycling facility at Lease area 11 and 15, Lot 5 on Diagram 91435 Flynn Drive, Neerabup with a design capacity of 150,000 tonnes per annual period.

Lot 5 on Diagram 91435 is owned by Alvito Pty Ltd and is divided into a number of smaller lease areas which are leased out to various companies including Alkina Holdings Pty Ltd. This lease area covers 1.5 hectares.

The premises is located within the City of Wanneroo and is currently zoned 'Rural' with 'Residential Urban Development' zoning on the southern side of Flynn Drive. The site is located within the Neerabup Industrial estate, however, in an area of the estate that is yet to be formally developed. The City of Wanneroo has issued planning approval for Industry – General (Storage and Sorting Activity) that expires on 2 December 2020. The owner is intending on reviewing the site utilisation and amend site approvals to be in line with the surrounding activities. The premises is intended to operate for a 5 years therefore the licence will be issued for a 4 year period.

The Environmental Protection Authority's Guidance Statement No 3, Separation Distances between Industrial and Sensitive Land Uses, recommends a separation distance of 1,000 metres for a premises that undertakes crushing, with the main emissions considered to be noise and dust. Due to the separation distance not being met, DER has placed greater regulatory controls to manage the risk of emissions.

Dust and noise have been identified as the main potential emissions.

This Licence is for the operation of a facility that is already operating and not constructed under a works approval.

| Instrument log | | |
|----------------|-----------|-----------------|
| Instrument | Issued | Description |
| L8946/2016/1 | 1/04/2016 | New application |

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'Acceptance Criteria' has the meaning defined in Landfill Definitions;

'annual period' means the inclusive period from 1 April until 31 March;

'asbestos' means the asbestiform variety of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals and includes actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite and any mixture containing 2 or more of those;

'ACM' means Asbestos Containing Material;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

'classified load' means any load that has been identified as containing asbestos or ACM;

'construction and demolition waste' has the meaning defined in Landfill Definitions;

'DER Asbestos Guidelines' means document titled "Guidelines for managing asbestos at construction and demolition waste recycling facilities", published by the Department of Environment and Conservation, as amended from time to time;

'Inert Waste Type 1' has the meaning defined in Landfill Definitions;

'Inert Waste Type 2' has the meaning defined in Landfill Definitions;

'Landfill Definitions' means the document titled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer of the Department of Environment as amended from time to time;

'Licence' means this Licence numbered L8946/2015/1 and issued under the Act;

'Licensee' means the person or organisation named as Licensee on page 1 of the Licence;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

'Schedule 1' means Schedule 1 of this Licence unless otherwise stated;



'Schedule 2' means Schedule 2 of this Licence unless otherwise stated; and

'usual working day' means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

1.2 Premises operation

1.2.1 The Licensee shall only accept waste on to the Premises if:

- (a) it is of a type listed in Table 1.2.1;
- (b) the quantity accepted is below any quantity limit listed in Table 1.2.1;
- (c) it meets any specification listed in Table 1.2.1.

| Table 1.2.1: Waste acceptance | | |
|-------------------------------|--|--|
| Waste | Quantity Limit | Specification |
| Clean fill | N/A | None |
| Inert Waste Type 1 | Combined total of 150,000 tonnes per annual period | <ul style="list-style-type: none">Residential, Construction and Demolition, Commercial and Industrial waste only.Waste containing visible asbestos or ACM shall not be accepted |
| Putrescible Waste | | <ul style="list-style-type: none">Green waste, timber, pallets and cardboard only.Excludes putrescible waste from municipal collections |

1.2.2 The Licensee shall ensure that where waste does not meet the waste acceptance criteria set out in condition 1.2.1 it is removed from the Premises by the delivery vehicle or, where that is not possible, stored in a quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable.

1.2.3 The Licensee shall ensure that any waste that does not conform to the waste acceptance criteria in Table 1.2.1 due to asbestos content, is covered or bagged and kept within a clearly identified, labelled, segregated and secure container prior to being removed off site to an appropriate authorised facility within 48 hours.

1.2.4 The Licensee must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.

1.2.5 The Licensee must include a 'no asbestos' clause in all contracts with material sources.

1.2.6 The Licensee must maintain a clearly visible sign saying 'No Asbestos' at the entry to the Premises.

1.2.7 The Licensee must only accept waste onto the Premises for storage, sorting or crushing that is Inert Waste Type 1 with a signed declaration from the supplier of the source material with each delivery that warrants that the load does not contain any asbestos or ACM.



- 1.2.8 The Licensee must visually inspect all loads of material when they arrive at the Premises prior to unloading and during unloading to ensure that the material does not contain visible asbestos or ACM (classified load).
- 1.2.9 Where the inspection confirms that material does contain asbestos or ACM, the Licensee must:
- (i) reject the waste material for acceptance;
 - (ii) maintain accurate records of all rejected loads on the Premises and the documentation must be made available to DER officers upon request; and
 - (iii) record the details of the material source, material carrier, registration number of the vehicle and date of rejection.
- 1.2.10 The Licensee must maintain Classified Loads in a damp state using appropriate dust suppression measures.
- 1.2.11 The Licensee must ensure that suspected classified loads are isolated, kept damp and appropriately contained, and the Licensee must comply with the *Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC:2002(2005)]* and the *Health (Asbestos) Regulations 1992*.
- 1.2.12 The Licensee must ensure that suspected classified loads are classified as “high risk” and continue to be managed in accordance with the high risk procedure as outlined in section 3.4 of the DER Asbestos Guidelines.
- 1.2.13 The Licensee must, as a minimum maintain records of all accepted load inspections and of any accepted loads which have been determined as Classified Loads or as “high risk” loads.
- 1.2.14 The Licensee must continue to visually inspect material on the Premises at all stages of the storage, sorting and crushing process. Suspect asbestos identified at any stage of the process must be handled in accordance with Conditions 1.2.11 of this Licence.
- 1.2.15 The Licensee must within 3 months from the date of this Licence, maintain material on the Premises in at least two separate stockpiles areas for unprocessed material, processed material tested for ACM and:
- (i) unprocessed material and processed material areas must be kept clearly separated at a minimum 3m distance;
 - (ii) processed material tested for ACM and processed material awaiting testing for ACM must be clearly separated by a minimum 3m distance OR clearly delineated and separated with impermeable barriers; and
 - (iii) clearly visible and legible signage must be erected on individual stockpiles to clearly identify and delineate tested processed material, untested processed material and unprocessed material.
- 1.2.16 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 1.2.2 and in accordance with any process limits described in that Table.

| Table 1.2.2: Waste processing | | |
|-------------------------------|--|---|
| Waste type | Process | Process limits |
| Clean Fill | Acceptance and storage prior to use in land remediation | <ul style="list-style-type: none">• Stockpiles must not exceed 7m in height from the base of the stockpile• All loads to be wet down prior to unloading |
| Inert Waste Type 1 | Acceptance and storage prior to crushing and screening and removal offsite | <ul style="list-style-type: none">• Stockpiles must not exceed 7m in height from the base of the stockpile• All loads to be wet down prior to unloading• No more than 50,000 tonnes per |



| Table 1.2.2: Waste processing | | |
|-------------------------------|---|--|
| Waste type | Process | Process limits |
| | | year may be crushed and screened. |
| Putrescible Waste | Acceptance and storage prior to removal offsite | <ul style="list-style-type: none"> No waste material to be landfilled (buried) on site Green waste shall be stored in dedicated storage areas. Stockpile dimensions shall be maintained to a height of no greater than 3 metres and to a width no greater than 5 metres. A minimum 3 metre separation distance between the base of the storage areas shall be maintained. Green waste shall not be processed or shredded on the premises. A 5 metre firebreak must be maintained around the greenwaste storage area at all times. Green waste shall be removed within 7 days of being received on-site. |

1.2.17 The Licensee shall ensure that the asbestos content of any recycled output originating from construction and demolition waste does not exceed the contamination limits specified in Table 1.2.3.

| Table 1.2.3: Recycled output contamination limits | | |
|---|------------------------|------------|
| Output | Parameter | Limit |
| Recycled drainage rock | Asbestos (in any form) | 0.001% w/w |
| Recycled sand | | |
| Recycled road base | | |

1.2.18 The Licensee shall ensure that recycling outputs originating from construction and demolition waste are sampled and tested in accordance with Table 1.2.4.

| Table 1.2.4: Recycled output sampling and testing | | | |
|---|------------------------|------------|---|
| Output | Parameter | Limit | Method |
| Recycled drainage rock | Asbestos (in any form) | 0.001% w/w | In accordance with the DER Asbestos Guidelines. |
| Recycled sand | | | |
| Recycled road base | | | |

1.2.19 The Licensee shall take all reasonable and practical measures to ensure that no windblown waste escapes from the Premises and that windblown waste is collected on at least a weekly basis and appropriately contained.

1.2.20 The Licensee shall ensure no waste is burnt on the premises.

1.2.21 The Licensee shall implement control measures to prevent infestations of pests, flies and vermin at the Premises.

1.2.22 The Licensee shall ensure that the infrastructure or equipment specified in table 1.2.5 is installed and operated in accordance with the specifications in that table.



Table 1.2.5: Infrastructure/Equipment Requirements

| Item | Specification |
|--|--|
| Free-standing sprinkler system | Installed along boundary fence and within lease area with sufficient coverage over stockpiles and active operational areas including receipt, sorting and storage areas. |
| Dual spray jets on the intake, discharge and at the head of the forward conveyor on screening and crushing equipment | Ability to achieve average discharge rate of 30 L/min at 200 kilopascals. To be operating when the plant is operational. |
| Water tanker | Available to suppress dust in trafficable areas |

1.2.23 The Licensee restrict all vehicle movements at the premises to less than 20km/hour.

2 Monitoring

2.1 Monitoring of inputs and outputs

2.1.1 The Licensee shall undertake the monitoring in Table 2.1.1 according to the specifications in that table.

Table 2.1.1: Monitoring of inputs and outputs

| Input/Output | Parameter | Units | Averaging period | Frequency |
|---------------|---|----------------|------------------|---|
| Waste inputs | Clean fill, Inert Waste Type 1, Putrescible Waste (green waste) | m ³ | N/A | Each load arriving at premises |
| Waste outputs | Waste type as defined in the Landfill Definitions | m ³ | | Each load leaving or rejected from the Premises |

3 Information

3.1 Records

3.1.1 All information and records required by the Licence shall:

- (a) be legible;
- (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- (c) except for records listed in 3.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or waters.

3.1.2 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.

3.1.3 The Licensee shall:

- (a) implement a complaints management system that shall record the following information (if known or provided) about complaints received at the Premises concerning any environmental impact of the activities undertaken at the Premises:
 - i. name and address of the complainants (if consented);



- ii. date and time of complaint;
 - iii. date and time of alleged incident;
 - iv. alleged source of the incident;
 - v. general description of the alleged incident, including any environmental or health impacts reported by the complainant;
 - vi. wind direction, wind speed and temperature at time of alleged incident;
 - vii. likely source of the alleged incident; and
 - viii. actions taken by the Licensee to address the complaint, including the outcome of any investigation(s) and action(s) to verify any impacts.
- (a) complete an annual analysis and review of complaints recorded under 3.1.3(a) to identify any common factors and root cause of complaints and proposals to address these.

3.2 Reporting

3.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 28 calendar days after the end of the annual period. The report shall contain the information listed in Table 3.2.1 in the format or form specified in that table.

| Table 3.2.1: Annual Environmental Report | | |
|--|---|---------------------------------------|
| Condition or table (if relevant) | Parameter | Format or form ¹ |
| - | Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken | None specified |
| 1.2.18 | Recycled output sampling and testing | None specified |
| 2.1.1 | Monitoring of inputs and outputs | None specified |
| 3.1.2 | Compliance | Annual Audit Compliance Report (AACR) |
| 3.1.3 | Complaints summary | None specified |

Note 1: Forms are in Schedule 2

3.3 Notification

3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

| Table 3.3.1: Notification requirements | | | |
|--|--|---|-----------------------------|
| Condition or table (if relevant) | Parameter | Notification requirement ¹ | Format or form ² |
| - | Breach of any limit specified in the Licence | Part A: As soon as practicable but no later than 5pm of the next usual working day. Part B: As soon as practicable | N1 |

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act

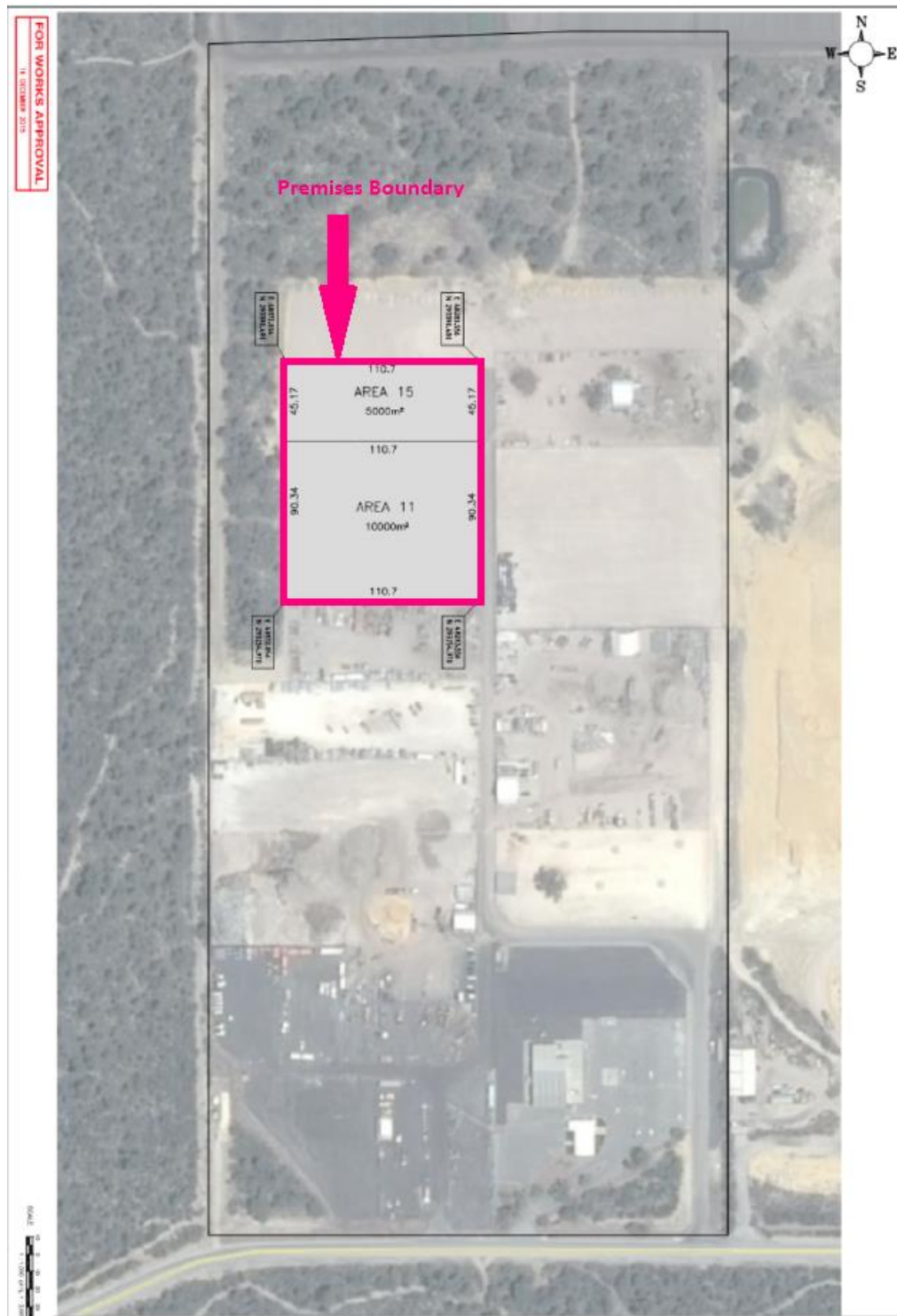
Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the map below. The pink line depicts the Premises boundary.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A LICENCE DETAILS

| | |
|-------------------------------------|----------------------|
| Licence Number: | Licence File Number: |
| Company Name: Trading as: | ABN: |
| Reporting period: _____ to _____ | |

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



SECTION B

DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

| | |
|--|-----------------------------|
| a) Licence condition not complied with: | |
| | |
| b) Date(s) when the non compliance occurred, if applicable: | |
| | |
| c) Was this non compliance reported to DER?: | |
| <input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____ | <input type="checkbox"/> No |
| d) Has DER taken, or finalised any action in relation to the non compliance?: | |
| | |
| e) Summary of particulars of the non compliance, and what was the environmental impact: | |
| | |
| f) If relevant, the precise location where the non compliance occurred (attach map or diagram): | |
| | |
| g) Cause of non compliance: | |
| | |
| h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance: | |
| | |
| i) Action taken or that will be taken to prevent recurrence of the non compliance: | |
| | |

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

| If the licence holder is | | The Annual Audit Compliance Report must be signed and certified: |
|--|--|--|
| An individual | <input type="checkbox"/> <input type="checkbox"/> | by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf. |
| A firm or other unincorporated company | <input type="checkbox"/> <input type="checkbox"/> | by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| A corporation | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| A public authority (other than a local government) | <input type="checkbox"/> <input type="checkbox"/> | by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| a local government | <input type="checkbox"/> <input type="checkbox"/> | by the chief executive officer of the licensee; or by affixing the seal of the local government. |

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____

SEAL (if signing under seal)

SIGNATURE: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____



Licence: L8946/2016/1
Form: N1

Licensee: Alkina Holdings Pty Ltd
Date of breach:

Notification of detection of the breach of a limit.

These pages outline the information that the operator must provide.
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

| | |
|--------------------------------|--|
| Licence Number | |
| Name of operator | |
| Location of Premises | |
| Time and date of the detection | |

| Notification requirements for the breach of a limit | |
|---|--|
| Emission point reference/ source | |
| Parameter(s) | |
| Limit | |
| Measured value | |
| Date and time of monitoring | |
| Measures taken, or intended to be taken, to stop the emission | |



Part B

| | |
|---|--|
| Any more accurate information on the matters for notification under Part A. | |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident. | |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission. | |
| The dates of any previous N1 notifications for the Premises in the preceding 24 months. | |

| | |
|---|--|
| Name | |
| Post | |
| Signature on behalf of Alkina Holdings Pty Ltd | |
| Date | |



Decision Document

Environmental Protection Act 1986, Part V

Proponent: **Alkina Holdings Pty Ltd**

Licence: **L8946/2016/1**

Registered office: Level 1, 10 Kings Park Road
WEST PERTH WA 6005

ACN: 124 202 491

Premises address: Alkina Holdings
Lease Area 11 and 15
190 Flynn Drive
NEERABUP WA 6031
Being part of Lot 5 on Diagram 91435

Issue date: Friday, 1 April 2016

Commencement date: Monday, 4 April 2016

Expiry date: Friday, 3 April 2020

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), CEO's delegated officer has decided to issue a licence. The delegated officer considers that in reaching this decision, he has taken into account all relevant considerations and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by: Josephine Tuohy
Licensing Officer

Decision Document authorised by: Alan Kietzmann
Delegated Officer



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1 Purpose of this Document

This decision document explains how the DER delegated officer has assessed and determined the application and provides a record of the decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

| Administrative details | | |
|--|---|---|
| Application type | Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/> | |
| Activities that cause the premises to become prescribed premises | Category number(s) | Assessed design capacity |
| | 13 | 50,000 tonnes per annual period |
| | 62 | 150,000 tonnes per annual period |
| Application verified | Date: 11/01/2016 | |
| Application fee paid | Date: 15/02/2016 | |
| Works Approval has been complied with | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| Compliance Certificate received | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| Commercial-in-confidence claim | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Commercial-in-confidence claim outcome | N/A | |
| Is the proposal a Major Resource Project? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/> |
| Is the proposal subject to Ministerial Conditions? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Ministerial statement No: EPA Report No: |
| Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes include details of which EPP(s) here. | | |
| Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP. | | |



3 Executive summary of proposal and assessment

1. Background

Alkina Holdings Pty Ltd has applied to DER for a Category 13 and Category 62 licence for the operation of a waste crushing and recycling facility at Lease area 11 and 15, Lot 5 on Diagram 91435 Flynn Drive, Neerabup with a design capacity of 150,000 tonnes per annual period.

Lot 5 on Diagram 91435 is owned by Alvito Pty Ltd and is divided into a number of smaller lease areas which are leased out to various companies including Alkina Holdings Pty Ltd. This lease area covers 1.5 hectares.

The premises is located within the City of Wanneroo and is currently zoned 'Rural' with 'Residential Urban Development' zoning on the southern side of Flynn Drive. The site is located within the Neerabup Industrial estate, however, in an area of the estate that is yet to be formally developed. The City of Wanneroo has issued planning approval for Industry – General (Storage and Sorting Activity) that expires on 2 December 2020. The owner is intending on reviewing the site utilisation and amend site approvals to be in line with the surrounding activities. The premises is intended to operate for a 5 years.

2. Location in environmental setting

The closest residential premises are located approximately 650 meters (m) to the south (based on GIS measurement from the lease area / premises boundary to the nearest residential receptor), with Flynn Drive and native vegetation buffer in between.

Department of Water's Perth Groundwater Atlas indicates that groundwater level is found at a depth of 26 m. There are no watercourses or wetlands within the premises boundary, the closest surface water body is Lake Pinjar, a conservation category wetland located approximately 1.5 kilometres (km) north east of the premises. A priority 1 and priority 3 Drinking Water Source Area (PDWSA) are located 1.8 km north east and 1.2 km south west of the premises respectively.

Threatened Ecological Community (TEC) 'Banksia attenuata woodland over species rich dense shrublands' (SCP20a) is located approximately 10 m west of the application area. The premises is located within the buffer zone of this TEC. There is no clearing proposed in this licence application.

Two soils types are mapped within the premises boundary; siliceous sands and brown sands. Bush Forever site 295 is located approximately 20 metres south of the application area and Bush Forever site 428 is located 1.5 kilometres north. Groundwater salinity is mapped as 500-1000mg/L Total Dissolved Solids, that is considered low and has an annual rainfall of 800 millimetres.

3. Proposal

The Proponent proposes to receive material predominantly from its own related collection business and also receives material from other commercial waste collection companies. The waste material is predominantly from residential clean-up (general household items, furniture, carpets, timber, scrap metal, plastics e-waste, and greenwaste), commercial and industrial sources and construction sites (concrete, sand, cardboard, scrap timber, greenwaste). There is no municipal solid waste (residential kerbside collection) received on site. The following waste types will not be accepted at the site: municipal solid waste, putrescible waste (other than cardboard, timber and greenwaste), asbestos, liquid waste or other problematic waste materials.

As part of the sorting process, concrete blocks, bricks and rubble are separated for recycling. Once separated, this material is stockpiled on site until sufficient quantity has been generated and then the material is crushed to produce a coarse graded crushing building product. This crushed product is then removed from site and used in the building industry as a recycled fill material.



The activities undertaken on site are:

- Receival and inspection of waste
- Sorting of waste material into recyclable and residual components
- Crushing of inert materials
- Storage of waste and recyclable material
- Off site removal

The sorting and waste handling processes involve a range of activities including:

- Mechanical sorting from stockpile to remove larger recyclable and waste materials
- Mechanical screening of mixed waste
- Picking belt
- Removal of non-compliant waste materials for appropriate off-site disposal.

The lease area consists of a fully fenced limestone / crushed rubble surface with lockable gates. The site also has a dedicated water supply from communal groundwater bore. Groundwater licence 179117.

The Environmental Protection Authority's Guidance Statement No 3, *Separation Distances between Industrial and Sensitive Land Uses*, recommends a separation distance of 1,000 metres for a premises that undertakes crushing, with the main emissions considered to be noise and dust. Due to the separation distance not being met, DER has placed greater regulatory controls to manage the risk of emissions.

All potential emissions and discharges have been discussed and addressed in the Decision Table. The Licence will be issued to Alkina Holdings Pty Ltd for a period of 4 years to ensure consistency with the City of Wanneroo's planning approval (valid until 2 December 2020).



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

| DECISION TABLE | | | |
|----------------------------------|---|---|--|
| Works Approval / Licence section | Condition number W = Works Approval L = Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Premises operation | L1.2.1 – 1.2.23 | <p>Condition 1.2.1 specifies the waste types and quantity limits that may be accepted at the premises to those that have been assessed under the licence application as suitable given the infrastructure and control measures at the premises.</p> <p>Condition 1.2.2 specifies that where waste is found to be non-conforming, the waste is segregated and removed offsite to ensure compliance with condition 1.2.1. Condition 1.2.3 further specifies that any non-conforming waste due to asbestos content is bagged, clearly labelled and segregated.</p> <p>Condition 1.2.16 limits the waste processing that can occur after assessment of the licence application given the infrastructure and control measures at the premises. Includes specification that no waste may be landfilled (buried) at the premises.</p> <p>Asbestos risk assessment <u>Emission Description</u> <i>Emission:</i> Asbestos fibres from non-conforming waste brought onto the premises and from crushing activities on site. <i>Impact:</i> Asbestos fibres can have severe health impacts including asbestosis and mesothelioma. The nearest residence is located approximately 650 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The licensee does not accept asbestos containing materials. The licensee implements an asbestos management plan that complies with DER's asbestos</p> | <p>'Alkina Holdings Pty Ltd, Flynn Drive Lease Area 11 & 15 Waste Sorting, Processing and Transfer Operation, Asbestos Management Plan', November 2015.</p> <p>'Guidelines for managing asbestos at construction and demolition waste recycling facilities', published by the Department of Environment and Conservation, as</p> |



| DECISION TABLE | | | |
|----------------------------------|--|--|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>guidelines. Controls include staff training to identify asbestos, inspecting all loads prior to and during unloading for suspect material, isolating and segregating suspected asbestos, keeping stockpiles and unloading areas damp, monitoring and product testing. Asbestos / ACM loads are removed from the premises within 48 hours.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Major <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the moderate risk rating for asbestos, a number of conditions have been specified in this licence that are in line with the DER's Asbestos Guidelines and the proponents commitments detailed in 'Alkina Holdings Pty Ltd, Flynn Drive Lease Area 11 & 15, Waste Sorting, Processing and Transfer Operation, Asbestos Management Plan', November 2015.</p> <p>Condition 1.2.1 specifies that waste containing visible asbestos or asbestos containing material shall not be accepted.</p> <p>Condition 1.2.3 specifies that identification and segregation of any identified asbestos content is required.</p> <p>Condition 1.2.4 specifies that the Licensee must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.</p> <p>Condition 1.2.5 the Licensee must include a 'no asbestos' clause in all contracts with material sources.</p> | <p>amended from time to time.</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004.</i></p> <p><i>Health (Asbestos) Regulations 1992.</i></p> <p>Code of Practice for the Safe Removal of Asbestos 2nd Edition</p> |



| DECISION TABLE | | | |
|----------------------------------|--|---|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>Condition 1.2.6 The Licensee must maintain a clearly visible sign saying 'no asbestos' at the entry to the Premises.</p> <p>Condition 1.2.7 The Licensee must only accept Inert Waste Type 1 with a signed declaration from the supplier that warrants that the load does not contain any asbestos or ACM.</p> <p>Condition 1.2.8 The Licensee must visually inspect all loads prior to unloading and during unloading to ensure that the material does not contain visible asbestos or ACM.</p> <p>Condition 1.2.9 specifies what actions are to occur when asbestos or ACM is confirmed in accordance with the DER's Asbestos Guidelines.</p> <p>Condition 1.2.10 Specifies that the Licensee must maintain Classified Loads in a damp state using appropriate dust suppression measures.</p> <p>Condition 1.2.11 specifies that the Licensee must ensure that suspected loads are isolated, kept damp and appropriately contained and the Licensee must comply with the Code of Practice for the Safe Removal of Asbestos 2nd Edition and the <i>Health (Asbestos) Regulations 1992</i>.</p> <p>Condition 1.2.12 specifies that the Licensee must ensure that suspected loads are classified as 'high risk' and managed in accordance with the DER Asbestos Guidelines.</p> <p>Condition 1.2.13 specifies that the Licensee must maintain records of all accepted loads which have been determined as Classified Loads or as 'high risk'.</p> <p>Condition 1.2.14 specifies that the Licensee must continue to visually inspect material on the Premises at all storage, sorting and processing states to identify asbestos.</p> <p>Condition 1.2.15 specifies that the Licensee must maintain material on the Premises in</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|---|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>at least two separate stockpiles for unprocessed and processed material tested for ACM.</p> <p>Condition 1.2.17 requires the licensee to ensure that any recycled output contains no more than 0.001%w/w asbestos and condition 1.2.18 requires recycled outputs to be tested to ensure compliance with condition 1.2.17. These conditions ensure compliance with the DER asbestos guidelines.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Major <i>Likelihood:</i> Rare <i>Risk Rating:</i> Moderate</p> <p>Fire risk assessment <u>Emission Description</u> <i>Emission:</i> Smoke emissions from fire at premises (green waste stockpiles) and/or contaminated fire-fighting water used to suppress fire entering the environment. Fire spreading to adjacent premises. <i>Impact:</i> Smoke may cause nuisance impacts or exacerbate respiratory issues at nearby receptors. Smoke may impact local flora and fauna. The nearest residence is located 650 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever reserve is located to the south and eastern boundaries. <i>Controls:</i> The licensee has not proposed any specific fire control measures. Raw greenwaste is kept in stockpiles for a maximum of 7 days and taken off-site. Green waste is not mulched, burnt or composted on-site.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Table 1.2.2 requires that the green waste be stored in dedicated storage areas which are maintained in stockpiles with a 5 m firebreak which is consistent with green waste storage requirements on similar prescribed premises, to reduce the risk of fire spreading and assists in fire fighters being able to readily access any burning green waste.</p> <p>Condition 1.2.20 specifies that no waste shall be burnt at the premises to avoid deliberate emissions and prevent potential for fire to spread to other parts of the premises or lot.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p>Leachate risk assessment <u>Emission Description</u> <i>Emission:</i> Leachates generated from the storage of green waste which may contain organic compounds, terpenes, phenols and/or have a high biological oxygen demand (BOD) and nutrient concentrations being generated from greenwaste stored at the premises. Other putrescibles are limited and considered to have low leachability potential. <i>Impact:</i> Leachates may enter surface water or groundwater in the area, causing aquatic organism death or bioaccumulation of contaminants in the surrounding ecosystems. Groundwater is found at a depth of 26 m and the nearest surface water</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>body is located approximately 1.5 km to the north east of the premises. <i>Controls:</i> Green wastes are stored on limestone rubble for a maximum of 7 days.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the distance to groundwater the likelihood of leachates migrating to groundwater is considered unlikely given the waste type and restriction on the period for which storage is permitted. As the nearest surface water body is located 1.5 km north east and there are no local drainage channels the likelihood of leachates migrating to surface water bodies is considered unlikely. Any discharges from the premises can be regulated under the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p>Hydrocarbon storage risk assessment <u>Emission Description</u> <i>Emission:</i> Hydrocarbon spill from diesel, oils and grease storage on site <i>Impact:</i> Hydrocarbons may enter surface water or groundwater in the area, causing aquatic organism death or degradation of the surrounding ecosystems. Groundwater is found at a depth of 26 m and the nearest surface water body is located approximately 1.5 km to the north east of the premises.</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><i>Controls:</i> The licensee has stated that oils and grease will be limited to small quantities of 5-25 litres and will be stored undercover within shipping containers.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Given the containment in place and distance to groundwater the likelihood of hydrocarbons migrating to groundwater is considered rare. As the nearest surface water body is located 1.5 kilometres north east the likelihood of leachates migrating to surface water bodies is also considered rare. Any discharges from the premises will be subject to the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> <p>Stormwater risk assessment <u>Emission Description</u> <i>Emission:</i> Stormwater contaminated with Leachates generated from the storage of green waste and other waste types <i>Impact:</i> Contaminated stormwater may enter surface waters in the area causing aquatic organism death or bioaccumulation of contaminants in the surrounding ecosystems. The nearest surface water body is located approximately 1.5 km to the north east of the premises.</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|---|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><i>Controls:</i> Stormwater drainage is managed across the whole of the Lot and flows in a north westerly direction towards a retention basin.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Given the predominant acceptance of inert waste types there is limited potential for stormwater to become contaminated. As the nearest surface water body is located 1.5 kilometres north east and stormwater is directed to retention basin, leachate migrating to surface water bodies is considered unlikely. Any discharges from the premises can be regulated under the provisions of the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p>Vermin Vermin may cause a public nuisance impacts at nearby receptors or potentially transmit infectious disease. Vermin attracted to the area may impact local flora and fauna ecosystems Given the limited volume of household waste and putrescibles that are accepted on site there is expected to be limited food source for such vermin. The applicant proposes to engage with a pest controller if vermin are identified on site. The applicant also proposes to use rat traps around the premises to identify if any rats or mice are present. Condition 1.2.21 requires the licensee to implement control</p> | |



| DECISION TABLE | | | |
|----------------------------------|--|--|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | measures to prevent infestations of pests, flies and vermin at the premises to minimise the likelihood of any impacts. | |
| Fugitive emissions | L2.1.1 L1.2.22 L1.2.23 | <p><u>Dust emissions risk assessment</u></p> <p><u>Emission Description</u> <i>Emission:</i> Dust emissions from crushing of building material, stockpiling of waste, vehicle movements. <i>Impact:</i> Dust can negatively impact the health, welfare and amenity of those on nearby properties as well as flora and fauna. The nearest residents are located 650 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever site is located adjacent to the west and southern boundaries. The application area is within a TEC buffer. <i>Controls:</i> The proponent submitted a dust management plan as part of its application. The proponent proposes the use of sprinklers throughout the site including stockpiles, a water truck to be used on site to wet access roads, work areas and stockpiles, reticulation sprinkler systems on dust generating operations and material stockpiles and crushing equipment will have dust suppression systems fitted. Other measures include speed restrictions, ceasing work during windy and dusty conditions, hydro-mulching, wetting down of dust-generating loads and maintaining a comprehensive complaints register. Water for dust suppression will be derived from an existing groundwater extraction system on Lot 5 and the lease area is provided with a supply of bore water from this communal source. All groundwater extraction is carried out in accordance with the Rights to Water Irrigation Act 1914 (Groundwater Licence Number – 179117; allocation 5,000 m³/year).</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> | <p>'Alkina Holdings Pty Ltd, Flynn Drive Lease Area 11 & 15 Waste Sorting, Processing and Transfer Operation, Dust Management Plan, November 2015 amended from time to time;</p> <p><i>Environmental Protection Act 1986</i></p> |



| DECISION TABLE | | | |
|----------------------------------|--|---|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><u>Regulatory Controls</u></p> <p>The Environmental Protection Authority's Guidance Statement No 3, <i>Separation Distances between Industrial and Sensitive Land Uses</i>, recommends a separation distance of 1,000 m for a premises that undertakes crushing, with the main emissions considered to be noise and dust. The closest sensitive residential receptor is located approximately 650 m south that is within the recommended separation distance. Given the location within the recommended buffer zone, and the risk assessment rating of moderate a number of commitments from the submitted dust management plan have been included as licence conditions to require that these specific actions are taken.</p> <p>Table 1.2.2 specifies that all loads must be wet down prior to unloading. Condition 1.2.22 and Table 1.2.5 requires the licensee to install and operate the free standing sprinkler system along the boundary as well as the spray jets on the crushing and screening equipment. Condition 1.2.23 requires all vehicles on the premises to drive at 20 km/hour or less to reduce the likelihood of dust generation from vehicular movement.</p> <p>Additionally, Condition 1.2.16 specifies that stockpiles must not exceed 7 meters in height from the base of the stockpile in line with requirements on licences for similar operations. Higher stockpiles are exposed to higher wind velocities and therefore greater potential of dust emissions. Higher stockpiles also have a higher discharge height and therefore dust can potentially travel a greater distance before it settles (larger impact plume).</p> <p>As there are residential properties located within 1,000 m radius of the premises, Condition 4.1.3 has been included to require detailed information of complaints to ensure that in the event of a complaint the root cause can be determined, and the regulatory controls placed on the licence can be reviewed.</p> <p><u>Residual Risk</u></p> | |



| DECISION TABLE | | | |
|----------------------------------|--|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p>Windblown waste risk assessment</p> <p><u>Emission Description</u> <i>Emission:</i> Windblown waste <i>Impact:</i> Windblown waste can negatively impact the amenity of those on nearby properties as well as flora and fauna. The nearest residence is located 650 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. A Bush Forever site is located adjacent to the west and southern boundaries. The application area is within a TEC buffer. <i>Controls:</i> The licensee maintains perimeter fencing around the lease area and commits to undertaking regular litter collection activities.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Condition 1.2.19 has been included in the licence to ensure that Licensee prevents windblown waste escaping the Premises boundary and undertakes weekly collection of windblown waste.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> | |



| DECISION TABLE | | | |
|----------------------------------|---|---|--|
| Works Approval / Licence section | Condition number W = Works Approval L = Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Odour | N/A | <p><u>Emission Description</u> <i>Emission:</i> Odour from receipt and storage of putrescible wastes (green wastes, timber, pallets and cardboard), and potential temporary storage of non-conforming waste types. <i>Impact:</i> Odour can negatively impact on the welfare and amenity of those on nearby properties. The nearest residence is located 650 m south, and there are industrial/farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The licensee does not accept any other putrescible waste types. Greenwaste is stored for a minimal time on site and no composting or mulching is taking place.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 1.2.16, Table 1.2.2 specifies that no greenwaste shall be processed or shredded at the premises, and requires green waste to be removed within 7 days to limit the potential for decomposition and odour generation.</p> <p>This assessment has determined that odour can be appropriately managed under the general provisions of the <i>Environmental Protection Act 1986</i> and therefore no additional conditions are required.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely</p> | <i>Environmental Protection Act 1986</i> |



| DECISION TABLE | | | |
|----------------------------------|--|--|---|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <i>Risk Rating: Low</i> | |
| Noise | N/A | <p><u>Emission Description</u> <i>Emission:</i> Noise emissions from crushing and screening activities, heavy machinery operation and vehicle movements on site. Activities on site may contribute to accumulative impacts given that several similar operations occur on the same lot and multiple crushers may operate at the one time. <i>Impact:</i> Noise can cause a nuisance for people on nearby properties and may disturb native fauna. The nearest residence is located approximately 650 m south and there are industrial / farming premises located immediately adjacent to the northern and eastern boundaries. <i>Controls:</i> The Licensee has provided a noise assessment which demonstrates that all the lease areas within Lot 5 can cumulatively meet the assigned noise levels in the <i>Environmental Protection (Noise) Regulations 1997</i>. The site operating hours are 7:00 am to 5:00 pm Monday to Saturday. The Licensee has committed to continual monitoring of noise emissions and taking corrective actions in the event of excessive noise emissions such as ceasing operations, staged operations or altering equipment used. The licensees located on the same Lot that undertake crushing and screening have committed to only operating one crusher at any one time therefore reducing potential impacts from cumulative noise emissions.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Possible <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> No conditions relating to noise are proposed for the licence as any noise emissions can</p> | <p><i>Environmental Protection (Noise) Regulations 1997</i></p> <p>Herring and Storer Acoustics, IW Projects, Lot 5 (190 Flynn Drive Road, Neerabup, Noise Emissions Assessment, October 2015</p> |



| DECISION TABLE | | | |
|----------------------------------|---|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L = Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Monitoring of inputs and outputs | L2.2.1 | Condition 2.1.1 requires the licensee to monitor inputs and outputs. This information is required to determine compliance with condition 1.2.1 throughput limits and validate annual fee submissions. | N/A |
| Ambient quality monitoring | N/A | There are no ambient quality monitoring conditions required on this licence. | N/A |
| Meteorological monitoring | N/A | There are no meteorological monitoring conditions required on this licence. | N/A |
| Improvements | N/A | There are no improvement conditions required on this licence. | N/A |
| Information | L3.1.1 – 3.3.1 | <p>Condition 3.1.1 sets out the requirements for any records that are required under this licence, such as ensuring they are legible and retained for 6 years which assists DER in regulating the conditions of this licence.</p> <p>Condition 3.1.2 requires the occupier to undertake an audit of their operations against the conditions of the licence and to report on this compliance in an Annual Audit Compliance Report (AACR). This condition assists DER in regulating the occupier's compliance with licence conditions and allows and opportunity for DER to review the occupier's environmental performance.</p> <p>Condition 3.1.3 requires a complaints management system to be implemented where the occupier can internally address any issues that arise from premises operations. This condition is required as per the risk assessments conducted above for nuisance emissions. DER will review these complaints as reported in the Annual Environmental Report (AER) and will consider whether a reassessment of any regulatory controls is required to address any complaints.</p> <p>Condition 3.2.1 requires the licensee to submit an AER. The AER is required to include the AACR and a summary of the complaints required under condition 3.1.3. The AER</p> | N/A |



| DECISION TABLE | | | |
|----------------------------------|--|---|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>is also required to provide results for the monitoring of inputs/output, monitoring of asbestos content of recycled products and a summary of malfunction of pollution control equipment or any environmental incidents. DER reviews all of the data provided in the AER to assess compliance with the licence conditions and to monitor the environmental impacts from the premises.</p> <p>Condition 3.3.1 requires the licensee to notify the CEO if there is a breach of any licence limit (i.e. processing limits). The notifications required under this condition give DER appropriate notice of any environmental impacts at the premises so that DER can determine if any further action is required to address the incident.</p> | |
| Licence Duration | N/A | The premises has planning approval from the City of Wanneroo that expires on 2 December 2020. It is recommended that this licence be issued for a period of 4years in line with the planning approval. | Department of Environment Regulation Guidance Statement, Licence Duration, November 2014 (revised May 2015). |



5 Advertisement and consultation table

| Date | Event | Comments received/Notes | How comments were taken into consideration |
|------------|---|---|--|
| 22/02/2016 | Application advertised in West Australian (or other relevant newspaper) | No comments received. | N/A |
| 22/02/2016 | Application referred to interested parties listed - City of Wanneroo | <p>The City of Wanneroo provided the following comments on 14 March 2016:</p> <ul style="list-style-type: none">On the 17th December 2014 the City received an application from Alvito Pty Ltd to commence development of an Industry – General (Storage & Sorting Activity) at 190 Flynn Drive, Neerabup.The subject land is zoned Industrial and Other Regional Roads. The Neerabup Industrial Area - Agreed Structure Plan No. 17 the land is zoned General Industry, wherein the use class Industry – General (storage & Sorting Activity) is a Permissible use.The City granted the application on 2 December 2015 to commence development of Industry – General (Storage & Sorting Activity).The approval included conditions concerning dust and sand drift | Comments considered in the assesment |
| 18/03/2016 | Proponent sent a copy of draft instrument | Feedback was received on 30 March 2016. The applicant was satisfied with the proposed Licence and Decision Document. | Finalisation of instrument |



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

| Likelihood | Consequence | | | | |
|----------------|---------------|----------|----------|----------|---------|
| | Insignificant | Minor | Moderate | Major | Severe |
| Almost Certain | Moderate | High | High | Extreme | Extreme |
| Likely | Moderate | Moderate | High | High | Extreme |
| Possible | Low | Moderate | Moderate | High | Extreme |
| Unlikely | Low | Moderate | Moderate | Moderate | High |
| Rare | Low | Low | Moderate | Moderate | High |