



Application for Licence

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

Licence Number	L3070/2025/1
Applicant	Australia Western Railroad Pty Ltd
ACN	094 792 275
File number	APP-0030152
Premises	<p>Aurizon Forrestfield Container Terminal 882 Abernethy Road, High Wycombe, WA, 6057</p> <p>Legal description - Part Lot 7 on Deposited Plan 421438 Certificate of Title Volume 4005 Folio 722 As defined by the coordinates in Schedule 2 of the licence</p>
Date of report	21 November 2025
Decision	Licence granted

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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 L3070/2025/1 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 30 July 2025, the applicant (Australia Western Railroad Pty Ltd) submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application seeks a licence to temporarily store packaged and bulk controlled waste at the premises. Australia Western Railroad Pty Ltd intends to transport all types of solid and liquid controlled waste by rail from Perth to Kalgoorlie and the eastern states.

Controlled waste will be delivered to the Aurizon Forrestfield Container Terminal by licensed transporters, either operated by Aurizon or other approved contractors. Upon arrival, sealed containers and bulk waste tanks will be directly transferred from trucks or trains and temporarily placed on the asphalt hardstand (for solid waste) or within site bunds (for bulk liquid waste). These waste containers will remain on-site for limited periods before being transported to their final destinations via rail.

The applicant has obtained a Dangerous Goods Site Licence (DGS023077) issued by the former Department of Energy, Mines, Industry Regulation and Safety (DEMIRS), authorising the handling and storage of controlled waste at the Forrestfield Container Terminal. In addition, the premises is supported by a site-specific Fire and Emergency Services Emergency Response Guide (FES-ERG).

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 L3070/2025/1. 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) are outlined in licence L3070/2025/1.

3. Contaminated Sites Act 2003

The proposed premises was classified under the *Contaminated Sites Act 2003* as *contaminated – remediation required* in November 2020. The classification was based on a series of environmental investigations between 2017 and 2020. Those investigations identified hydrocarbon-impacted soils at several locations across the site at depths of up to 2 metres below ground level.

Perfluoroalkyl and polyfluoroalkyl substances (PFAS) were also identified in groundwater, on-site and extending off-site approximately 30 metres in a westerly direction, at concentrations exceeding health-based assessment levels for drinking water and recreational water as published in the 'PFAS National Environmental Management Plan' (Heads of EAPs Australia and New Zealand, Version 2.0 – January 2020) (PFAS NEPM)

which were the relevant assessment levels at that time. PFAS in groundwater also exceeded assessment levels for non-potable use of water, based on 10 times the drinking water guideline value published in the PFAS NEPM) as recommended at that time (WA Department of Health, 2020). In addition, concentrations substantially exceeded the assessment levels for freshwater ecosystems, which are relevant given the presence of conservation category wetlands down-hydraulic gradient of the site.

Based on the information available to the department at the time of classification, the site appears suitable for continued use as a rail yard and other related industrial activities. The abstraction of groundwater is not recommended due to potential contamination risks. Additionally, any intrusive work must be carried out in accordance with a site-specific health and safety plan.

The site remains subject to ongoing monitoring and remediation, and the storage of waste should be carefully managed to avoid interference with future investigations or remedial activities. In the event of any damage to the existing groundwater monitoring network, the applicant must replace the affected wells and incorporated into all future groundwater monitoring events.

4. 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.

4.1 Source-pathways and receptors

4.1.1 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
Operation			
Fire/smoke	Temporary storage of liquid or solid controlled waste on an asphalt hardstand	Air / windborne pathway	<p>A Site Emergency Management Plan is in place.</p> <p>Fire and Emergency Services – Emergency Response Guide (FESERG).</p> <p>Firefighting equipment is available at the premises.</p> <p>Solid waste will be stored in sealed containers, and liquid waste will be stored in sealed tanks within bunded areas.</p> <p>Controlled waste types to only be stored on the premises in a way which maintains safe separation distances of non-compatible materials (refer to Site Emergency Management Plan).</p>

Emission	Sources	Potential pathways	Proposed controls
Asbestos or other hazardous fibres		Air / windborne pathway	Solid waste will be stored within sealed containers.
Spills or leakage of dangerous or hazardous waste materials		Overland runoff Seepage to soil and groundwater	<p>All waste to be packaged in closed sealed containers and tanks.</p> <p>All solid waste to be stored on hardstand.</p> <p>All liquid waste to be stored within heavy duty and chemically resistant bunds. Each bund measures 16 m x 8 m x 0.75 m, and there are two bunds located on the premises.</p> <p>A Site Emergency Management Plan is in place.</p> <p>The premises has an on-site emergency spill response container with spill emergency response equipment including, spill kits, drain covers, absorbent material, shovels, brooms and booms.</p> <p>Controlled waste types to only be stored on the premises in a way which maintains safe separation distances of non-compatible materials (refer to Site Emergency Management Plan).</p>
Contaminated stormwater		Overland runoff Seepage to soil and groundwater	<p>All waste to be packaged in closed sealed containers and tanks.</p> <p>All solid waste to be stored on hardstand.</p> <p>All liquid waste to be stored within heavy duty and chemically resistant bunds. Each bund measures 16 m x 8 m x 0.75 m, and there are two bunds located on the premises.</p>
Firewater		Overland runoff Seepage to soil and groundwater	<p>A Site Emergency Management Plan is in place.</p> <p>Fire and Emergency Services – Emergency Response Guide (FESERG).</p> <p>The premises has an on-site emergency spill response container with spill emergency response equipment including, spill kits, drain covers, absorbent material, shovels, brooms and booms.</p>

4.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), 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)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential Premises	850 m north of the premises boundary
Industrial premises	25 m south of the premises boundary
Perth airport	1.5 km south-west of the premises boundary
Environmental receptors	Distance from activity / prescribed premises
Perth airport woodland swamps	540 m south-west of the premises boundary
Geomorphic wetland-	Multiple use - 75 m east of the premises boundary Multiple use - 240 m west of the premises boundary Resource Enhancement – 60 m east of the premises boundary
Bush forever area	540 m south-west of the premises boundary 750 m north of the premises boundary 690 m west of the premises boundary
Threatened Ecological Communities/Priority Ecological Communities	Priority 3 ecological community – 60 m east of the premises boundary BC Act Critically Endangered – 65 m east of the premises boundary
Threatened and priority flora	3 flora species have been recorded within a 1 km radius of the premises boundary
Proclaimed RIWI Act Groundwater area	Premises located within Perth groundwater area
Cultural receptors	Distance from activity / prescribed premises
Aboriginal heritage site	Premises located within Poison gully creek (birth place, water source)

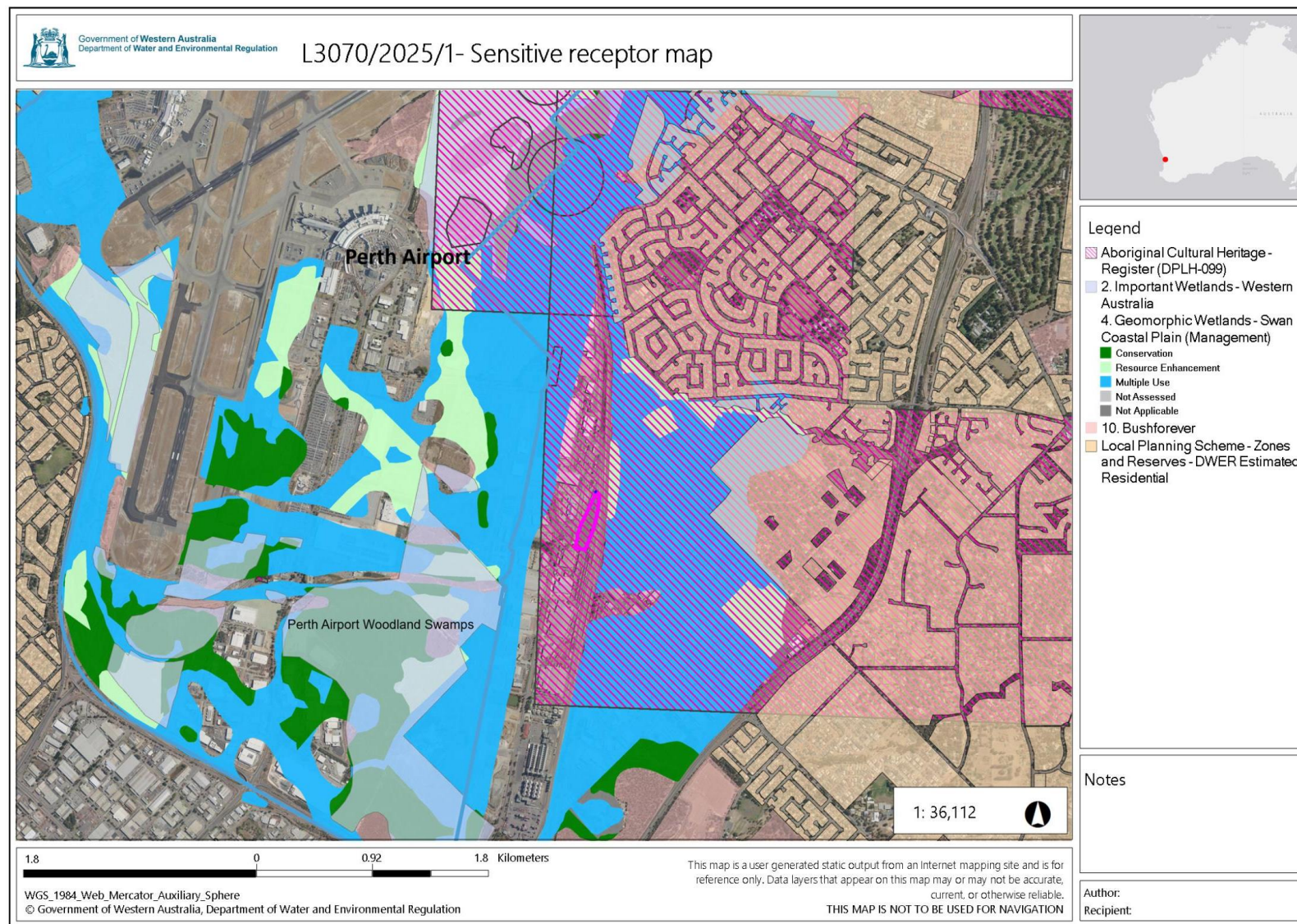


Figure 1: Distance to sensitive receptors

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IR-T13 Decision report template (short) v3.0 (May 2021)

4.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 4.1. 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 4.1), 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 L3070/2025/1 that accompanies this decision report authorises emissions associated with the operation of the premises.

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 ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Receipt and temporary storage of liquid or solid controlled waste on an asphalt hardstand	Fire/smoke	Air / windborne pathway causing impacts to health and amenity	Residential Premises ~ 850 m north Adjacent industrial premises TEC/PEC ~ 60 m east Aboriginal heritage site	Refer to Section 3.1	C = Severe L = Unlikely High Risk	Y	Conditions 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 16, 17 and 19	<p>The delegated officer has assessed the applicant's proposed operational controls and has incorporated additional regulatory requirements into Licence L3070/2025/1 to address fire risk. These measures include:</p> <ul style="list-style-type: none">Accepting only waste that is stored in sealed, watertight containers free from leaks and defects (condition 2);Limiting the total quantity of waste stored onsite to 1,000 tonnes at any one time (condition 3);Specifying storage requirements for used tyres and batteries (condition 7); andIncluding provisions to prevent the acceptance and processing of incompatible waste types (condition 5 and 6). <p>Furthermore, the licence includes conditions that prohibit burning activities onsite.</p> <p>Collectively, these controls are considered sufficient to mitigate the fire risk associated with the nature and volume of waste proposed to be stored and managed at the premises.</p>

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	Asbestos or other hazardous fibres			Refer to Section 3.1	C = Severe L = Unlikely High Risk	N	Conditions 1, 2, 3, 4, 5, 6, 7, 8, 18 and 19	The delegated officer has incorporated additional regulatory requirements into Licence L3070/2025/1. These include limiting the acceptance of asbestos and ceramic fibre waste, restricting asbestos storage to a maximum of 200 tonnes at any one time, and requiring that such waste be stored in sealed, watertight containers that are free from leaks and defects. These controls are considered adequate to prevent the release of asbestos and other hazardous fibres into the environment.
	Spills or leakage of dangerous or hazardous waste materials	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality Groundwater seepage	Adjacent industrial premises Perth groundwater area Perth airport Woodland swamps ~ 540 m south-west Geomorphic wetland ~ 75 m east Bush forever area ~ 540 m south-west TEC/PEC ~ 60 m east	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	Y	Conditions 2, 3, 4, 5, 6, 7, 8, 11, 13, 14 and 19	The delegated officer has considered the applicant's proposed controls and has incorporated standard spill management conditions (Conditions 13 and 14), along with additional measures into Licence L3070/2025/1, including: <ul style="list-style-type: none"> Ensuring waste vessels remain closed and are not opened unless necessary; Specific storage conditions for batteries, clinical waste, and PFAS; and Acceptance of waste only if stored in sealed, watertight containers that are free from leaks and defects. These controls are considered sufficient to minimise the risk of spills or leakage of dangerous or hazardous waste materials.

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls / DWER comments
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
	Contaminated stormwater		Aboriginal heritage site	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Conditions 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 and 19	<p>The delegated officer has taken into account the applicant's proposed control measures, which include storing all waste within containers or bunded tanks. Additional control measures have been incorporated into Licence L3070/2025/1 to:</p> <ul style="list-style-type: none"> Limit the quantity of waste that can be stored on the premises at any one time; Specify processing and storage criteria for certain controlled waste types; and Define the maximum duration for which waste can be stored on site <p>These controls are considered sufficient to prevent stormwater coming into contact with waste materials on the premises.</p>
	Firewater			Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition 2, 3, 4, 5, 6, 7, 8, 11, 13, 16, 17 and 19	<p>The delegated officer has added a requirement for a bund around the hardstand area, and all drains must be closed off during fire events to contain any spillage or firewater and ensure it is retained within the premises.</p>

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.

5. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 9 October 2025	None received	N/A
Local Government Authority (City of Kalamunda) advised of proposal on 22 October 2025	<p>On 22 October 2025, the City of Kalamunda advised that all liquid waste must be stored within lined, bunded containment areas, with no decanting or transfers occurring outside these areas. Bunds must be appropriately constructed and maintained to handle the specific types of liquids, and procedures must be in place for managing stormwater following rainfall events.</p> <p>To protect stormwater systems, the city requires complete separation between contaminated and clean stormwater. Moreover, the city advised that discharges to stormwater drains, or soak wells are not permitted. Drain covers and spill response equipment must be maintained at risk-prone locations, and routine inspections should be documented.</p> <p>The city recommended that the licence be limited strictly to the storage of controlled waste pending transport, with no processing or treatment activities permitted under the licence.</p> <p>Also, the city advised that annual throughput should be capped at 20,000 tonnes for both liquid and solid waste categories. The operator must maintain weighbridge or inventory records to demonstrate compliance with these limits. Furthermore, the city advised that these records should be retained for a minimum of five years and be made available to both DWER and the City upon request.</p> <p>A Spill Response Plan aligned with the Site Emergency Response Plan must be maintained, and relevant staff should be trained accordingly. Any notifiable incidents must be reported to DWER as soon as practicable and within 24 hours, followed by a written report within five business days. The city advised that the city should also be copied on these reports.</p>	DWER acknowledges the advice provided by the City of Kalamunda regarding this application. Conditions have been incorporated into the licence to address the City's concerns regarding waste containment, waste segregation, stormwater management, waste acceptance and storage limits, record keeping, and notification requirements.

Consultation method	Comments received	Department response
	<p>The City advised that the licence conditions should complement the existing Dangerous Goods Site Licence issued by DMIRS. Any overlapping requirements, such as those related to ignition sources, segregation, and manifest management, must be consistently addressed.</p> <p>The city also noted that the site would be included in its Light Industry Program (LIP) in collaboration with DWER. This program involves unannounced inspections focusing on bunding, stormwater protection, spill readiness, and the storage of chemicals and wastes to prevent unauthorised discharges. Inspection outcomes will be shared with DWER.</p> <p>In conclusion, the City of Kalamunda does not object in principle to DWER issuing a licence for the short-term storage of controlled waste at the Forrestfield Container Terminal. The City confirmed that the proposed activity complies with local planning requirements and does not require additional development approval.</p>	
Department of Planning Land and Heritage (DPLH) advised of proposal	None received	N/A
Applicant was provided with draft documents on 5 November 2025	Refer to appendix 1.	Refer to appendix 1.

6. 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 Fire and Emergency Services 2020, Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres, Perth, Western Australia.
3. Department of Health (DoH) 2021, Code of Practice for Clinical and Related Waste Management, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER) 2021, *Guideline: Managing asbestos at construction and demolition waste recycling facilities*, Perth, Western Australia.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
7. Heads of EPAs Australia and New Zealand (HEPA) 2020, PFAS National Environment Management Plan Version 3.0.

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

Condition	Summary of applicant's comment	Department's response
Cover page - Assessed design capacity	The applicant has requested an increase in the assessed design capacity for both solid and liquid waste to 30,000 tonnes each, to align with the capacities specified in licences L9319 (Kwinana) and L9323 (Kalgoorlie)	The condition has been amended as requested. The Delegated Officer notes that must not store more than a total of 1,000 tonnes of waste at the premises at any one time during times of normal operation and no more than no more than a total of 3,000 tonnes of waste during emergency or unforeseen circumstances outside of the licence holder's control.
Condition 4	The applicant has requested the inclusion of the following condition in the licence, consistent with Condition 4 of the Kwinana (L9319) and Kalgoorlie (L9323) licences: 'In times of emergency or unforeseen circumstances outside of the licence holder's control, the licence holder is permitted to store no more than a total of 3,000 tonnes of waste at the premises at any one time.'	The condition has been amended as requested. This provides consistency across the licence holders operations and allows for flexibility in storage during transportation disruptions, during emergency, or unforeseen circumstances outside of the licence holder's control.
Condition 10	The applicant has requested the inclusion of the following condition in the licence, consistent with Condition 10 of the Kwinana (L9319) and Kalgoorlie (L9323) licences: "In times of emergency or unforeseen circumstances outside of the licence holder's control, the licence holder is permitted to store waste on the premises for no more than 14 days from arrival."	The condition has been amended as requested. This provides consistency across the licence holders operations and allows for flexibility in storage during transportation disruptions, during emergency, or unforeseen circumstances outside of the licence holder's control.
Condition 12	The applicant has requested an amendment to Condition 12 on the basis that the site does not have a physical gate and has confirmed the following: <ul style="list-style-type: none"> • The site operates a 24/7 monitored gatehouse and security checks are conducted routinely during shifts to prevent unauthorised access. • All waste containers stored on the premises are locked with a bolt seal. • Half-height containers have closable watertight sealed lids with latches that cannot be opened without mechanical assistance such as a forklift or specific opening advice. These containers cannot be opened manually under any circumstances 	Considering the information provided, the delegated officer has agreed to amend Condition 12 as requested by the applicant. These controls have been added to the licence as licence conditions.