



Application for Licence

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

Licence Number	L3214/2026/1
Applicant	K&K United Pty Ltd
ACN	657989485
APP number	APP - 0033476
Premises	Green Tyre Technology 28 Lionel st, Naval base, 6165 Legal description Lot no. 508 Plan no.3638 Land certificate of title volume 1276. Polio 805
Date of report	11 May 2026
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 L3214/2026/1 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 14 October 2025, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act). The application was to seek the construction of time limited operation of a Tyre Handling Facility (Used tyre storage and shredding) at 28 Lionel st, Naval base, 6165 (the premises).

As additional clarity surrounding proposed operations was required during validation of this application, the department attended a site inspection with the Department of Fire and Emergency Services (DFES) on 13 January 2026. On outcome of the site inspection, it was determined that a tyre shredder was already in place at the premises. The occupier of any premises who carries out any work on or in relation to the premises which causes the premises to become, or to become capable of being, prescribed premises commits an offence unless the work is done in accordance with a works approval. The installation of the tyre shredder without a valid works approval in place for the premises therefore constitutes an offence under the EP Act.

The department does not issue works approvals in retrospect. As such, the applicant was advised to withdraw their works approval application and submit a licence application to assess ongoing operation of the Tyre Handling Facility. The works approval application was withdrawn by the applicant as requested on 20 January 2026. Offences under the EP Act will be followed up by the departments Assurance (compliance) branch.

On 27 January 2026, the applicant subsequently submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act). The licence application seeks authorisation for ongoing operation of the Tyre Handling facility. As construction of the facility could not be assessed under a works approval, the department has assessed the suitability of the existing infrastructure at the premises to mitigate emissions and discharges as a part of the licence application. The premises is located in the City of Kwinana, approximately 3.80 km south-east of Medina, 6167.

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 L3214/2026/1. 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 L3214/2026/1.

2.2.1 Premises overview

Existing infrastructure located at the premises includes a fully enclosed warehouse for tyre-shredding operations, which current houses the tyre shredder. The premises also encompasses external storage areas, perimeter bunding, stormwater and firewater containment

sumps, and dedicated on-site fire-management equipment. The warehouse is constructed on a hardstand surface that is proposed to be maintained in good condition and free of cracks or damage. External areas of the site provide designated hardstand zones for the storage of used tyres, with all stacking and separation practices to be compliant with applicable spacing and height requirements.

The premises is secured by perimeter fencing and controlled access points to prevent unauthorised entry to the building and storage areas. Firefighting infrastructure, including hose reels, hydrants and fire extinguishers, are installed throughout the site to support rapid emergency response. Stormwater and potential firewater runoff are managed through engineered containment systems designed to prevent discharge to the environment, with all containment structures isolated from the sewer network.

2.2.2 Proposed operations

The premises will operate as a used-tyre storage and processing facility under Categories 57 and 61A. Up to 600 tyres will be stored on-site at any one time, and up to 624 tonnes per year of used tyres will be accepted and processed.

Used tyres will be delivered to the premises and unloaded into the designated storage and warehouse areas. All tyre shredding will occur inside the warehouse, using an enclosed shredder equipped with covered feed and output areas. Tyres will be shredded to sizes no smaller than 100 mm and no larger than 150 mm to permit export. Shredded material will not be stored in the warehouse; instead, they will be placed immediately into concealed bags and loaded directly onto trucks for removal from the site. Operations will occur across Monday to Friday from 07:00 to 18:00, and Saturday from 07:00 to 13:00, excluding public holidays.

3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this 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
Dust	Tyre shredding	Air / windborne pathway	<ul style="list-style-type: none"> Shredding will occur indoors in a factory shed. Minimum shredding dimension of 100mm.
Noise			<ul style="list-style-type: none"> Shredding will occur indoors in a factory shed.

Emission	Sources	Potential pathways	Proposed controls
			<ul style="list-style-type: none"> • Operations will be restricted to 7am to 6pm Monday to Friday and 7am to 1pm Saturdays. • Production activities will always be carried out within an enclosed area.
Noise	Loading/unloading trucks	Air / windborne pathway	<ul style="list-style-type: none"> • Operations will be restricted to 7am to 6pm Monday to Friday and 7am to 1pm Saturdays.
Smoke and fire wash waters	Fire	Overland runoff and seepage through soil to groundwater	<ul style="list-style-type: none"> • Tyre stacks will be maximum of 3.7 m high with the appropriate separation distances as per DFES guidance GN02. • Shredded tyres are not permitted to be stored within the warehouse. All shredded material will be placed immediately into concealed bags upon processing and then loaded directly onto the delivery trucks. • Access way and external yard will be kept clear for emergency vehicle access. • Fire washwater will be contained within the premises by bunding, with all surfaces sealed, preventing leachate to groundwater or drainage basin. Isolation valves are installed in drains. • Fire wastewater will be removed and appropriately disposed of by a contractor. • A Fire and Emergency Management Plan has been prepared for the premises.

3.1.2 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.

Receptor ID	Human receptors	Distance from prescribed activity
H1	Closest residential receptor Thomas road - Medina avenue	Approximately 3.80km south-east of the premises
N/A	Residential Premises Wattleup Road	Approximately 4.68km north-east of the premises
	Environmental receptors	Distance from prescribed activity
E1	Regional parks - Beeliar	Approximately 1.44km north-east of the premises
N/A	Threatened ecological communities	Specimen recorded approximately 1.38km of premises boundary
N/A	Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary

and

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

Receptor ID	Human receptors	Distance from prescribed activity
H1	Closest residential receptor Thomas road - Medina avenue	Approximately 3.80km south-east of the premises
N/A	Residential Premises Wattleup Road	Approximately 4.68km north-east of the premises
	Environmental receptors	Distance from prescribed activity
E1	Regional parks - Beeliar	Approximately 1.44km north-east of the premises
N/A	Threatened ecological communities	Specimen recorded approximately 1.38km of premises boundary
N/A	Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary



Figure 1: Proximity of sensitive human and environment receptors to the premises (as indicated by reference P).

3.2 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 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

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

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

Licence L3214/2026/1 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	App co suff	
Sources / activities	Potential emission	Potential pathways and impact	Receptors		Applicant controls	C = consequence L = likelihood	
Receival and unloading of used tyres Operation of tyre shredding equipment and machinery Vehicle movements	Dust	Air / windborne pathway causing impacts to health and amenity	Receptor ID	Human receptors	Distance from prescribed activity	Refer to Table 1, Section 3.1.1 C = Moderate L = Unlikely Medium Risk	
	H1		Closest residential receptor Thomas road - Medina avenue	Approximately 3.80km south-east of the premises			
	N/A		Residential Premises Wattleup Road	Approximately 4.68km north-east of the premises			
			Environmental receptors	Distance from prescribed activity			
	E1		Regional parks - Beelihar	Approximately 1.44km north-east of the premises			
	N/A		Threatened ecological communities	Specimen recorded approximately 1.38km of premises boundary			
	N/A		Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary			
	Human Receptors listed in						

Risk events					Risk rating ¹	App co suff	
Sources / activities	Potential emission	Potential pathways and impact	Receptors		Applicant controls	C = consequence L = likelihood	
Fire incident during waste tyre processing and storage	Smoke and particulates	Air / windborne pathway causing impacts to health and amenity	Human Receptors listed in		Refer to Table 1, Section 3.1.1	C = Major L = Possible High Risk	
			Receptor ID	Human receptors		Distance from prescribed activity	
			H1	Closest residential receptor Thomas road - Medina avenue		Approximately 3.80km south-east of the premises	
			N/A	Residential Premises Wattleup Road		Approximately 4.68km north-east of the premises	
				Environmental receptors		Distance from prescribed activity	
			E1	Regional parks - Beelias		Approximately 1.44km north-east of the premises	
			N/A	Threatened ecological communities		Specimen recorded approximately 1.38km of premises boundary	
			N/A	Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary		
	Fire embers	Air / windborne pathway causing impacts to health, amenity and	Human Receptors listed in			C = Major L = Possible High Risk	

Risk events						Risk rating ¹	App co suff
Sources / activities	Potential emission	Potential pathways and impact	Receptors			Applicant controls	C = consequence L = likelihood
		vegetation	Receptor ID	Human receptors	Distance from prescribed activity		
			H1	Closest residential receptor Thomas road - Medina avenue	Approximately 3.80km south-east of the premises		
			N/A	Residential Premises Wattleup Road	Approximately 4.68km north-east of the premises		
				Environmental receptors	Distance from prescribed activity		
			E1	Regional parks - Beeliar	Approximately 1.44km north-east of the premises		
			N/A	Threatened ecological communities	Specimen recorded approximately 1.38km of premises boundary		
			N/A	Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary		
			Environmental Receptors listed in				

Risk events						Risk rating ¹	App co suff
Sources / activities	Potential emission	Potential pathways and impact	Receptors			Applicant controls	C = consequence L = likelihood
			Receptor ID	Human receptors	Distance from prescribed activity		
			H1	Closest residential receptor Thomas road - Medina avenue	Approximately 3.80km south-east of the premises		
			N/A	Residential Premises Wattleup Road	Approximately 4.68km north-east of the premises		
				Environmental receptors	Distance from prescribed activity		
			E1	Regional parks - Beeliar	Approximately 1.44km north-east of the premises		
			N/A	Threatened ecological communities	Specimen recorded approximately 1.38km of premises boundary		
			N/A	Threatened fauna - Mammal	Specimen recorded approximately 1.40km of premises boundary		
			Firewater	Overland runoff and seepage through soil to groundwater causing ecosystem disturbance	Underlying groundwater		

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls		
		or impacting water quality				

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.

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Local Government Authority (City of Kwinana) advised of proposal on 27 February 2026	None received	It is the responsibility of the applicant to ensure all regulatory approvals are in place prior to commencing operations. This includes any development / planning approvals required from local government.
Department of Fire and Emergency Services (DFES) advised of proposal 27 February 2026	None received. DFES provided comment during validation of the withdrawn works approval for the premises, advising the following: <ul style="list-style-type: none"> The fire management plan should address risk management and minimisation by outlining controls to be implemented and used to Prevent, Prepare, Respond and Recover There is no mention of fire water containment or maximum storage capacity. 	DWER confirms that a new fire and emergency management plan was submitted to support the licence application, which included the information flagged by DFES. The licence contains conditions requiring the fire and emergency management plan be implemented, maintained and updated. Conditions have been placed on the licence outlining how fire wash waters must be managed in the event of a fire.

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that the application to renew licence L3214/2026/1 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

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